

INVITATION – ABIAL EVENING SEMINAR

DATE:Tuesday, October 11, 2016VENUE:Double Tree by Hilton (12 Rue Jean Engling, 1466 Luxembourg)TIME:6.30 pm – 8.00 pm (registration as from 6 pm) followed by a cocktail

"From BEPS to Apple, via the EU Commission - where the tax avoidance battle is going, internationally and locally"

Tax avoidance - real or imagined - continues to make the headlines, and not just in the business pages. ABIAL invites you to spend an evening with experts on this topic, who will update you on what has happened so far in 2016, and give their views on what the future might now hold.

Our keynote speaker will be **Liam Lynch**, the current President of Chartered Accountants Ireland, whom ABIAL is honoured to welcome as a visitor from Ireland to Luxembourg.

1. What's happened to BEPS? How are the EU, and the major nations, now implementing the OECD's recommendations?

David Roach, PwC Luxembourg's BEPS commentator, will give an update, and look at what's likely to be coming next.

2. The Apple case - what's the story, and what happens now?

On August 29, 2016, the EU Commission ordered Ireland to recover up to EUR 13 billion of unpaid taxes from Apple, stating that tax rulings that Ireland granted in 1991 and 2007 allowed Apple to pay substantially less tax than other businesses, with this representing State aid given by Ireland in breach of EU law. This is a landmark ruling in an area of EU law that has evolved rapidly since 2014, and which could also have significant consequences for Luxembourg.

Liam Lynch, Tax Partner with KPMG Dublin, will give his Irish perspective, and his thoughts on how the tax profession internationally might now evolve.

3. The Luxembourg response to the new environment

How is Luxembourg now progressing with implementing the BEPS measures and EU Directives? What do the EU Commission's actions on State aid mean for Luxembourg? What are the implications of the coming exchanges of information between EU tax authorities concerning Luxembourg tax rulings? How are Luxembourg taxpayers responding? What does the 2017 tax reform - long-heralded, and now set out in a bill before the Luxembourg Parliament - actually mean in detail for Luxembourg companies? Is Luxembourg coping well in the new climate? Can it continue to attract and keep business activities such as European headquarters or treasury operations? What does all this mean for the mainstream funds management industry?

Louis Thomas, Tax Partner with KPMG Luxembourg, will give an analysis, and offer views on what the future might now hold for Luxembourg.



Administration

The cost of the seminar (including cocktail) is: EUR 20 for Members EUR 30 for Guests (non-members) and EUR 10 for the first 5 students of the UK or Irish Institutes on a first come and first served basis.

Please note that payment should be made via bank transfer to BIL, IBAN LU56 0024 1398 5698 8300, in advance.

Cash may be accepted at the door on an exceptional basis but there is no possibility to pay by credit card at the Double Tree by Hilton!

Reservation

A reservation can be made via the ABIAL website (www.abial.lu) until Thursday, October 6, 2016.

Please note that the Double Tree by Hilton is enforcing a "no show" policy. If you make a reservation and do not appear, you will be charged 100% of the respective price. You may, of course, cancel before the deadline or invite a colleague to attend in your place. We appreciate you respecting this policy.

Kind regards

Jason Rea Chairman of ABIAL