

THURSDAY 21 NOVEMBER 2019 | THE BERKELEY, LONDON

The IBSA is pleased to invite you to attend the 2019 Annual Conference on Thursday 21st November where we will be examining how the fictitious case study involving the SIRE Fund requires the creation of an international structure for its real estate projects, reviewing the complexities of the many different tax issues affecting these developments, and the various methods of financing the SIRE Fund's business strategy.

The concept of the SIRE Fund is to attract investors wishing to have an interest in global buy-to-let holiday homes. The Fund, through its SPV subsidiaries, will acquire hotels, mansion houses and development sites with the intention of developing apartments with centralised leisure facilities, operated by a world-renowned holiday home resort property company. Considering alternative financing techniques, the Fund will offer its own cryptocurrency to finance the acquisition, with each holder entitled to a discount on the advertised weekly rental of any apartment developed by the Fund. With developments being considered in the European Union, the UK and the US, the conference will explore the complexities of different taxes relevant for acquisitions by the Fund's non-resident SPVs of immovable property in another country. With sessions examining real estate development strategies, corporate residence and re-domiciliation, various methods of financing the Fund's business strategy, substance and the MLI, and personal tax residence concerns, the conference will identify a range of issues for both entrepreneurs and professional advisors.

Our panel of international speakers will engage delegates in discussions on their particular topic, similar to the highly acclaimed meetings held by the IBSA globally throughout the year. The conference will be a full day at The Berkeley, Wilton Place, Knightsbridge, London SW1X 7RL, and the fee will be £850 plus VAT reduced to £500 plus VAT for IBSA members.

For details of the day and to book your ticket, please visit www.theibsa.org

For IBSA members and other registrants who wish to bring along their younger professional colleagues at a discounted rate of £350 plus VAT, please contact Lucie.Hoyland@theibsa.org

- 08:30 REGISTRATION
- 09:15 CHAIRMAN'S INTRODUCTION TO THE SIRE CASE STUDY
- 09:30 STRUCTURING THE SIRE INTERNATIONAL REAL ESTATE FUND
- Fund Creation
 - Regulatory Issues
 - Management Company Issues
- 10:10 FINANCING THE SIRE FUND
- The SIRE Cryptocurrency
 - Mezzanine Finance
 - Private Equity Investment
 - Retail Bonds
- 10:50 NETWORKING REFRESHMENT BREAK
- 11:20 REAL ESTATE STRATEGIES & TAX ISSUES;
- European Market Overview
 - Tax Optimisation
 - Asset v Share Deals
- 12:10 REAL ESTATE STRATEGIES, TAX ISSUES AND REITS IN;
- the UK & US
- 12:50 LUNCH BREAK
- 14:00 INTERNATIONAL STRUCTURES FOR THE SIRE FUND
- Holding Company Jurisdiction
 - Licensing Arrangements
 - Use of Conduit Companies
- 14:40 SUBSTANCE AND THE MLI
- Substance Requirements
 - Limitation of use of Double Tax Treaties
 - Implementation of the BEPS Initiatives
- 15:20 NETWORKING REFRESHMENT BREAK
- 15:50 CORPORATE RESIDENCE AND RE-DOMICILIATION
- Concept of Effective Management
 - Exit Taxation
 - Migration of Companies
- 16:30 EXPLORING FUTURE DEVELOPMENTS IN THE ECONOMY AND THE EFFECT THEY MAY HAVE ON REAL ESTATE
- This will be an informal presentation and discussion of ideas with drinks available
- 17:00 CLOSE OF CONFERENCE

This conference is a MUST for Property Fund Managers, Fund Administration companies, Intellectual and Real Property lawyers, Tax Consultants, Corporate Finance specialists and Corporate Service Providers.

It has been approved with full conformity for 6 hours' accreditation under CPD guidelines.