

# Tax planning solutions for Russian clients

**Tax residency, tax treaty benefits, holding foreign assets: how to adjust to the recent and upcoming changes?**

**Sergei Alimirzoev,**

Partner,  
Alimirzoev & Trofimov Law Firm,  
Moscow

**Ilya Aleshchev,**

TEP, Partner,  
Alimirzoev & Trofimov Law Firm,  
Moscow

**TRANSFER OF TAX RESIDENCY**

**14.00 International mobility and tax residency**

- Re-assessment of clients' true tax residency
- Cyprus, Maltese, UAE tax residents/citizens with Russian connections
- Risk factors for remaining Russian tax residents
- Center of Vital interests test
- Red flags / common misconceptions of Clients
- Possible technical glitches and mismatches upon transfer of tax information
- OECD lists of countries selling citizenship
- After the end of Cyprus citizenship by investment programme, what are the best options?

**RENEGOCIATION/DENUNCIATION OF DOUBLE TAX TREATIES**

**14.40 Renegotiation of Double Tax Treaties: what impacts on current tax planning strategies? What new structures could be substituted?**

- Which DTTs are impacted and how?
- Latest proposals from Russia to change Swiss treaty
- Denunciation of the DTT between Russia and the Netherlands
  - Which alternative structures/jurisdictions should be chosen by the Russian investors who were willing to structure through the Netherlands?
  - What should the Russian investors do with their existing Dutch structures?
- Amendments to Russia-Malta and Russia-Luxembourg DTTs
- Next stages: renegotiation of DTTs with Switzerland, Hong Kong and Singapore

- Pros and Cons for using structures vs. private accounts
- Russian CFC rules' impact on payments to Russian clients from structures
- Russian CFC fixed tax payment

15.20 Coffee break

**HOLDING FOREIGN ASSETS**

**15.40 Critical assessment of the compliant structures used to hold foreign assets**

- Cash and portfolio of securities
- Private equity
- Real estate
- Art collection
- Jets, yachts

**16.20 How to continue to use companies which do not need organisational substance (office, personnel) in the post BEPS/MLI era?**

- Companies used to hold securities, cash, yachts, real estate...

**TAX OFFICE AUDITS**

**16.50 Recent cases of Russian tax office audits of clients with foreign accounts and CFCs**

- Typical requests and statute of limitations for audits
- Extent of reviews and types of documents and information requested
- Initial conclusions from first audits

17.30 End of the seminar

**ZURICH, WEDNESDAY 17 NOVEMBER 2021, 14.00-17.30, KAMEHA GRAND / ONLINE**

**INFORMATION & REGISTRATION**

Tel: +41 22 849 01 11 Fax: +41 22 849 01 10  
info@academyfinance.ch  
Academy & Finance SA  
PO Box 6069, CH-1211 Geneva 6  
www.academyfinance.ch

**FEE**

620 CHF + VAT (7.7%)  
Additional participants from the same company: -50%

**PAYMENT**

An invoice will be sent to you by email following registration. Payment is made by bank transfer or credit card.

I register to the conference "Tax planning solutions for Russian clients" on 17 November.

I wish to attend online on Zoom.

Full name .....

Position ..... Company.....

Address .....

Zip code/City .....

Tel ..... Mobile.....

E-mail.....

Date ..... Signature.....