

Taxation of Groups

– A comprehensive overview of the taxation of corporate groups

Book by
23rd October 2009
to Save £50

Agenda at a Glance:

- Introduction to UK corporation tax
- Introduction to groups
- Capital gains and groups
- Group and consortium relief
- The substantial shareholding exemption
- Reorganisations and reconstructions
- Mergers and joint ventures
- Demergers
- The impact of the EU on taxation of groups
- The wider international dimension

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Organised by:

25th November 2009, etc Venues - The Hatton, London
23rd March 2010, etc Venues - The Hatton, London



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Course Overview:

The objective of the course is to give an all-embracing **overview of the taxation** of groups, as a complete guide for people who are new to corporate tax or as a refresher and update course for those with more experience.

Starting with the basics - such as, what is a group? – this highly practical course will cover a number of the major areas of company taxation involving groups. In particular, the seminar will investigate **group and consortium relief**, including international aspects (namely the M&S and Oy AA cases). The programme will then go on to review the **capital gains rules** relating to groups, including the **reorganisation** and **reconstruction** rules and the **substantial shareholdings exemption** for trading groups.

Finally, participants will examine the **impact of EU legislation** on the day-to-day taxation of a group. All sessions have been designed to cover all of the underpinning theory in a **highly practical** and **interactive** way so that everyone gets a chance to contribute as well as to learn.

Meet Your Course Leader

Pete Miller is a partner with Powrie Appleby, a specialist tax firm based in Leicester but with a nationwide reach. He has more than 21 years' experience in tax, having started with the Inland Revenue in 1988. After training as an inspector, Pete spent some years in Policy Division, advising Ministers on Capital Allowances policy and on the taxation of the film industry, with particular reference to ensuring that the UK was a favourable location for making big budget movies. Pete then moved on to take up a role in Technical Division (Company Distributions). Here Pete was part of a team responsible for the Revenue's technical analyses of corporate distributions, a role that included being responsible for demerger clearances and for some of the major corporate reconstruction projects of the period.

Since leaving the Revenue in 1997, Pete worked for 11 years in 'Big 4' firms and specialised in a number of areas, including reorganisations and reconstructions, the substantial shareholdings exemption, and the taxation of M&A transactions and of intangible assets.

Pete is a regular contributor to books and journals, including Taxation, The Tax Journal and Simon's Direct Tax Service (he is a member of the Editorial Boards of The Tax Journal and Simon's). He is co-author, with George Hardy, of Taxation of Company Reorganisations (Tottel Publishing, 2nd edition, January 2009).

Who Should Attend

A wide range of people will benefit from attending this course: from newly-qualifieds wanting to fill in the gaps after their training, through to experienced advisors and corporate tax managers needing to refresh their knowledge and find out what's new in corporate tax. The job titles we would expect represented include:

- Tax Director
- Tax Accountant
- Tax Manager
- Solicitor
- Group Tax Accountant
- Tax Adviser
- Corporate Tax Manager
- Group Accounting Director

Upcoming events for your diary

The Definitive Permanent Establishment Mastercourse

23rd September 2009, London

www.ibt-events.com/PE

Tax Planning for Corporate Reorganisations

29th September 2009, London

www.ibt-events.com/reorganisations

Tax Planning Using Capital Allowances

29th September 2009, London

www.ibt-events.com/capitalallowances

Treasury for Tax People

30th September 2009, London

www.ibt-events.com/treasury

of Groups

2010, etc Venues - The Hatton, London

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09:00 Registration & Coffee

09:30 Introduction to UK Corporation

Tax: *A brief introduction and refresher on the taxation of companies in the UK*

Introduction to Groups

- n What is a group?
- n Why does it matter?

Group and Consortium Relief

- n Group relief groups
- n Operation of group relief
- n Operation of consortium relief

Capital Gains and Groups

- n What is a group?
- n Intra-group transfers
- n Joining and leaving groups
- n The exit charge
- n Recent developments

11:00 Coffee Break

11:30 The Substantial Shareholding Exemption

- n How the SSE works
- n Basic conditions
 - The substantial shareholding
 - The investing company
 - The investee company
- n Groups for SSE purposes

Reorganisations and Reconstructions

- n What is a reorganisation?
- n What is a reconstruction?
- n Some simple transactions
- n Interaction with SSE

13:15 Lunch

14:15 Mergers and Joint Ventures

- n Joint ventures and structuring
- n Group mergers
- n Company mergers

Demergers

- n What is a demerger?
- n Company demergers
- n Group demergers

15:30 Coffee Break

15:50 The Impact of the EU on Taxation of Groups

- n What is the EU about?
- n M&S and cross-border group relief
- n Mergers Directive
 - EU mergers and demergers
 - EU transfers of assets
- n Other EU Directives
 - Parent-Subsidiary Directive
 - Interest and Royalties Directive
- n What does the future hold?

The Wider International Dimension

- n Multi-national groups and some issues that arise

Due to unforeseen circumstances, the programme may change and IIR reserves the right to alter the venue and or the speakers.

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