EU Anti-Tax Avoidance Directive ("ATAD") and Mandatory Automatic Exchange of Information – "DAC 6"

**Aim:**
As access to the global marketplace grows with cross-border transactions, it is vital to expand and enrich your knowledge of the drastically new tax landscape shaped by the OECD/BEPS action plan and the corresponding EU actions. Cross-border transactions will be now seen in the light of new anti-abuse measures and additional transparency requirements. This seminar has been specifically designed to meet the needs of professionals from various backgrounds who wish to develop their competence in the field of international tax, and benefit from the credibility that this expert knowledge will afford them.

**Objective:**
The aim of this seminar is to familiarize participants with two very important new EU Directives:
- The Anti-Tax Avoidance Directive ("ATAD") which requires EU Member States to introduce a number of anti-abuse measures. Since most of the measures had to be implemented per January 2019, the EU countries have already adopted or adjusted their laws to comply and prepare for additional measures which have to apply in 2020. Especially holding and financing structures have to be reviewed in the light of the new rules.
- The EU Directive on Mandatory Automatic Exchange of Information "DAC 6" which introduces an additional level of transparency in order to detect potentially aggressive tax arrangements and which already captures a broad spectrum of arrangements implemented on/after 25 June 2018. Professionals classified as intermediaries and/or taxpayers themselves could have an own responsibility to monitor and report several contemplated or implemented transactions.

**SEMINAR DETAILS**

<table>
<thead>
<tr>
<th>Dates:</th>
<th>21 November 2019</th>
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<tbody>
<tr>
<td>Time:</td>
<td>09:00 – 17:15</td>
</tr>
<tr>
<td>Duration:</td>
<td>7 hours / CPD units</td>
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<tr>
<td>Town:</td>
<td>Nicosia</td>
</tr>
<tr>
<td>Venue:</td>
<td>Globaltraining/University of Nicosia</td>
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<tr>
<td>Language:</td>
<td>English</td>
</tr>
<tr>
<td>Cost:</td>
<td>€280. Cost After HRDA Subsidy €161</td>
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**Lecturer’s Profile:**
Charalambos Antoniou, BSc, FCCA, ADIT
Charalambos has broad experience within banking and insurance industry in Finance and Tax departments. He is currently Global Head of Tax Operations, Transformation and Risk Management and Group Tax coordinator for M&A activities in a global Insurance Company. He is located in Zurich, Switzerland.
Charalambos is part-time lecturer for professional studies (ADIT and ACCA’s Taxation papers) in various countries and he is giving seminars in many International Tax topics. Completed his studies in Athens obtaining a BSc in Economics and then continued to obtain the ACCA qualification, becoming a member back in 2003 and the Advanced Diploma in International Taxation ("ADIT") qualification after the successful submission of his thesis in 2012. He is also an International Tax Affiliate of The Chartered Institute of Taxation.

**HRDA Subsidy:**
The programme has been approved by HRDA. Enterprises that participate with their employees who satisfy HRDA’s criteria, are entitled to subsidy.

**Contact Details:**
For more information and registrations please contact

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# Seminar Programme

**21/11/2019**

<table>
<thead>
<tr>
<th>Time</th>
<th>Duration</th>
<th>Description</th>
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| 9:00-11:00 | 2:00     | **Anti-Tax Avoidance Directive ("ATAD")**  
  - ATAD 4 – Interest limitation - Limited tax deductibility of net financing expense  
  - ATAD 5 – Exit Taxation - Mandatory taxation of hidden reserves upon relocation of entities/assets  
  - Selected key European jurisdictions that adopted ATAD 4 & ATAD 5  
  - Practical examples and class discussion |
| 11:00-11:15 | 0:15     | **Coffee Break** |
| 11:15 – 13:00 | 1:45   | **Anti-Tax Avoidance Directive ("ATAD")**  
  - ATAD 7/8 – CFC Rules - Mandatory inclusion of certain types of non-distributed income of foreign subsidiaries/PEs in tax base of parent/head office  
  - ATAD 6 – General Anti-Avoidance Rule: Disregarding of non-genuine arrangements  
  - Selected key European jurisdictions that adopted ATAD 6 & ATAD 7/8  
  - Practical examples and class discussion |
| 13:00 – 13:45 | 0:45     | **Lunch Break** |
| 13:45 – 14:45 | 1:00     | **Anti-Tax Avoidance Directive ("ATAD")**  
  - ATAD II 9/9a/9b – Hybrid Mismatches - Mandatory add-back of double deductions or deductions without inclusions due to differing qualification of payments, entities, financial instruments, etc.  
  - Selected key European jurisdictions that adopted ATAD II 9/9a/9b  
  - Practical examples and class discussion |
| 14:45 – 15:00 | 0:15     | **Coffee Break** |
| 15:00 – 17:05 | 2:05     | **DAC 6 – A new level of transparency – Mandatory Automatic Exchange of Information for reportable cross-border arrangements**  
  - DAC 6 in a nutshell – Who, What and Why  
  - How will work and what arrangements need to be reported  
  - Hallmarks  
  - Practical examples  
  - Selected key European jurisdictions that adopted DAC 6 |
| 17:05-17:15 | 0:10     | **Conclusion**  
  Evaluation of the seminar and lecturer by participants |

**Total Net Duration**: 7:00

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**Certification:**  
All participants will be awarded a certificate. Each hour of attendance will account for one unit of Continuing Professional Development (CPD) as required for members of most professional bodies.

**In-house Seminars:**  
Globaltraining has been cooperating with many companies in Cyprus and abroad for covering their in-house training needs. Some of these companies are large multinational companies with presence in Cyprus and abroad. The clients we serve include a wide range of industries, including banking, accounting and audit, investment services firms, telecommunication, construction and retail. Tailor-made seminars are offered upon request from clients.