

Programme: Investing in Irish Property – Tax and Accounting Considerations

Speakers: Amanda-Jayne Comyn, *Philip Lee*
 Ann-Marie Costello, *Grant Thornton*
 Padraig Daly, *Mazars*
 Ronan Harbourne, *BDO*
 Ethna Kennon, *KPMG*
 Alan Kilmartin, *Deloitte*

Date: Wednesday, 20 February 2019

Time: 09.30 – 16.30

CPD: 7 hours

Location: Radisson Blu Royal Hotel, Dublin 8 and online

Price: €170

Online Price: €145

Time	Topic	Speakers
09.15 – 09.30	Registration	
09.30 – 10.00	Corporate Finance <ul style="list-style-type: none"> Sources and types of finance available in Ireland for viable construction and development projects Project appraisal, feasibility assessments and financial modelling 	Ann-Marie Costello, <i>Grant Thornton</i>
10.00 – 11.45	Direct Tax <ul style="list-style-type: none"> Trading V Investment in property Development land Ownership structures – different means of structuring property investment in Ireland e.g. individual, corporates, trusts, funds, QIFs, unit trusts etc. Permanent Establishment issues Transfers of investment land and buildings to trading stock and vice versa Tax treatment on disposal – losses, reliefs, withholding Tax treatment of income arising from property Capital allowances Non-resident owners Areas of current Revenue focus 	Padraig Daly, <i>Mazars</i>
11.00 – 11.15	Tea/Coffee Break	
11.15 – 11.45	Direct Tax (continued)	Padraig Daly, <i>Mazars</i>
11.45 – 12.30	Stamp Duty <ul style="list-style-type: none"> Distinguish between residential and commercial property Implications of holding properties in investment vehicles Site sales combined with building contracts (residential & commercial) Leases Sub-sales Anti-avoidance – resting in contract, building licence, long agreement for lease, shares in companies/entities holding Irish non-residential property Rebate for land acquired for residential development 	Amanda-Jayne Comyn, <i>Philip Lee</i>

Time	Topic	Speakers
	<ul style="list-style-type: none"> Understand compliance obligations Current areas of Revenue focus 	
12.30 – 12.45	Q&A for morning session	
12.45 – 13.45	Lunch	
13.45 – 14.45	VAT <ul style="list-style-type: none"> VAT on property rules post 2008 Transfer of Business relief – let properties Capital Goods scheme Letting transactions – transitional properties Waivers of exemptions and options to consider VAT reverse charge in the context of property Special condition 3 considerations Forced Sales Current areas of Revenue focus 	Ethna Kennon, <i>KPMG</i>
14.45 – 15.00	RCT <ul style="list-style-type: none"> Compliance obligations for principal contractors Common pitfalls that arise in the operation of RCT Operation of RCT and reverse charge for VAT Current areas of Revenue focus 	Alan Kilmartin, <i>Deloitte</i>
15.00 – 15.15	Tea/Coffee Break	
15.15 – 15.45	RCT (continued)	Alan Kilmartin, <i>Deloitte</i>
15.45 – 16.15	Accounting <ul style="list-style-type: none"> Accounting treatment of property and construction activities and its tax impact Recent accounting standard changes for the property and construction sector 	Ronan Harbourne, <i>BDO</i>
16.15 – 16.30	Q&A for afternoon session	

Speakers

Amanda-Jayne Comyn is a partner and head of tax in Philip Lee. She has extensive experience advising on company law and on the commercial and tax aspects of M&As, reorganisations, estate and retirement planning, trusts and all aspects of property transactions with specialised experience in stamp duty and stamp duty planning. Amanda-Jayne is a barrister, a Chartered Tax Adviser (CTA) and a Trusts and Estates Practitioner. She regularly lectures to professionals and students and has authored and co-authored a number of publications including Bloomsbury's *Irish Law of Stamp Duty* and the Irish Taxation Institute's *Corporate Transactions: Tax and Legal Issues*.

Ann-Marie Costello is a Director in the Advisory services team of Grant Thornton. Ann-Marie has significant experience in transaction advisory, corporate finance, fundraising and restructuring assignments. She has worked with both financial institutions and corporates across a variety of industries, including healthcare, property, technology, hospitality and agrifood. Ann-Marie is an associate member of Chartered Accountants Ireland (ACA).

Padraig Daly is a Director with Mazars specialising in advising clients in the Construction industry as well as advising other Irish and multinational companies on mergers and acquisitions, corporate reorganisations and tax efficient financing. In recent years, he has focused on property development

and investment, during which he has advised on large residential and commercial developments, structuring investment into Ireland from abroad, public private partnerships and infrastructure projects. He has written and lectured extensively on tax matters including for the Institute and the main accounting bodies. He is an AITI Chartered Tax Adviser (CTA) and an Associate of the Chartered Certified Accountants (ACCA).

Ronan Harbourne is a Director at BDO with over 16 years' experience in audit and financial reporting. He specialises in dealing with and advising SME's, delivering audit services to several of BDO's largest Irish indigenous clients . His clients include companies operating in the property, manufacturing; distribution; agri-food,; and service sectors.

Ethna Kennon is a Director in the KPMG VAT Group and works with a wide range of Irish and multinational clients. She is a Chartered Tax Adviser (CTA) and an Associate of Chartered Accountants Ireland. She lectures for the Institute on VAT matters and also provides international training on VAT issues.

Alan Kilmartin is a senior manager in the Deloitte Dublin office specialising in VAT and Relevant Contracts Tax. He joined Deloitte in 2007 having previously worked for the Revenue Commissioners as a tax auditor. He has 19 years tax experience dealing with a wide variety of industries and has provided VAT and RCT services to clients in a number of sectors specialising in construction, renewable energy, exploration and related fields. He also has experience in negotiating settlements with Revenue.