



Annual Tax Summit 2021

REMOTE, YET CONNECTED




Visit: taxinstitute.ie

E: conference@taxinstitute.ie

T: +353 1 663 1700

Stream 1 - Tax in 2021 – Challenges and Opportunities Friday 16 April 2021

09.30 – 09.40	Opening Remarks	Sandra Clarke <i>President, Irish Tax Institute</i>
09.40 – 10.10	Advising Existing Family Businesses <ul style="list-style-type: none"> • Running the business <ul style="list-style-type: none"> ○ Matching corporate and ownership structures to strategic objectives of business owners at various stages of their career ○ Group structures, hive-outs and share buybacks • Structuring for exit <ul style="list-style-type: none"> ○ MBO, sale or succession ○ Common compliance issues to consider • Tips and traps to consider 	Marie Bradley 
10.10 – 10.40	New Business Founders and Investors - Tax and Raising Finance <ul style="list-style-type: none"> • Raising finance <ul style="list-style-type: none"> ○ Phase 1 and 2 - types of finance and their tax treatment ○ Common ownership structures - what do they look like in practice? • The lifecycle of funding: following the money <ul style="list-style-type: none"> ○ Tax relief and issues on investment through to exit ○ Appropriate funding sources and instruments at different stages of the business cycle ○ Commercial considerations for founders, friends and family (FFF) and external investors • Risks to be aware of 	Laura Lynch 
10.40 – 10.50	Q&A session	Marie Bradley, Laura Lynch & Sandra Clarke, Chair
10.50 – 11.00	Stretch Break	
11.00 – 11.40	Revenue Administered COVID-19 Supports – What's new? Panel Discussion – Engaging with Revenue in 2021	Brian Boyle  Revenue Cáin agus Custaim na hÉireann Irish Tax and Customs Feargal Kenzie Deloitte. Brian Boyle  Revenue Cáin agus Custaim na hÉireann Irish Tax and Customs Anne Gunnell & Mary Healy <i>Irish Tax Institute</i> Sandra Clarke <i>President, Irish Tax Institute & Chair</i>



Stream 2 - Essential Tax Developments for Advising SMEs Friday 23 April 2021

09.30 - 09.35

Welcome

09.35 - 10.05

Property in 2021

- A new property investment
 - Corporate or personal ownership
 - Foreign investors
 - Capital allowances
 - Financing costs
- A property development
 - Getting the structure right
 - The scope of Case V
 - Financing costs
- Property transaction traps in 2021

Cillein Barry



10.05 - 10.35

Employees and Directors of SMEs - Rewards and Incentives

- Share schemes to incentivise employees/directors including practical examples; what to use and when
- Pitfalls & implications of changing environment, including COVID-19
- Company valuations for tax purposes
- Other SME employment tax considerations

Marie Flynn &
Sarah Kirwan

10.35 - 10.45

Stretch Break

10.45 - 11.15

What Is cropping up in VAT?

- Roundup of recent technical amendments
- Overview of recent VAT cases
- Areas of current Revenue focus
- Future VAT reform

Deirdre Hogan



Stream 3 - Technical, Practical and International Updates for CTAs Friday 30 April 2021

09.30 - 09.35

Welcome

09.35 - 10.05

Technical Insights from Recent Tax Appeals Commission (TAC) Determinations

- The new world of regular TAC Determinations
- The relevance of Determinations in giving everyday tax advice
- Spotlight on some key Determinations for CTAs

Mark Barrett



10.05 - 10.25

Are You Cyber Secure?

Dr Mike Harris



10.25 - 10.35

Stretch Break

10.35 - 11.05

Technical Developments CTAs Need to Know

- The impact of international tax developments on domestic businesses including the Irish implementation of the EU Anti-Tax Avoidance Directive and DAC 6
- Overview of potential future changes to Ireland's corporation tax system
- Case studies demonstrating the potential impact of international tax developments on domestic businesses

Philip Murphy



11.05 - 11.25

A Chartered Tax Adviser's World

Fergal Cahill



11.25 - 11.30

Closing RemarksSandra Clarke
President, Irish Tax Institute

Speaker Biographies



MARK BARRETT is a Tax Partner with Ronan Daly Jermyn and an FITI Chartered Tax Adviser (CTA). He has worked in tax roles in both industry and practice and has advised Irish and multinational clients on a wide range of tax matters. Mark is also a Past President of the Irish Tax Institute and a member and past chairman of Main TALC. Mark is co-author of the Institute publication, *Revenue Audits and Investigations - The Professional's Handbook*.



CILLEIN BARRY is a Tax Partner in KPMG, advising a broad range of Irish and international businesses. His clients include privately owned groups, Irish and multinational public companies, and high net worth individuals. Areas of particular focus include real estate transactions, mergers and acquisitions, inbound and outbound investment and financing. Cillein also has significant experience advising multinational groups on their foreign direct investment into Ireland and previously spent a year on the firm's Irish tax desk in the US. He is a Chartered Tax Adviser (CTA).



BRIAN BOYLE is Head of the Accountant General's & Strategic Planning Division. Brian is responsible for overseeing the development and implementation of business policies, monitoring and evaluating national tax compliance risks. He is also responsible for performance measurement and reporting, statistics and economics research. Brian is also responsible for financial and information management, banking functions, communications and knowledge management functions. With Revenue for over 30 years Brian previously headed up the Personal Taxes Policy & Legislation Division and the Financial Services area in Revenue's Large Cases Division. Brian has a B.Sc. in Computer Science from TCD and an M.Sc. in Taxation from DCU.



MARIE BRADLEY is Managing Director of Bradley Tax Consulting and previously worked in the taxation departments of PwC and KPMG. She is an FITI Chartered Tax Adviser (CTA) and a Fellow of Chartered Accountants Ireland. Bradley Tax Consulting provides tax advice to companies and individuals across all tax heads. The firm works with Irish businesses and their shareholders on corporate restructuring and succession issues and advises high net worth individuals. It also advises companies who are expanding into new markets and require assistance in managing their Irish and international tax affairs. Marie is a Past President of the Irish Tax Institute.



FERGAL CAHILL is Principal and founder of Cahill Taxation Services (CTS). He is a Chartered Tax Adviser (CTA) and a graduate of Law & Accounting from UL. Prior to founding CTS in 2007, his career included spells with PwC, FGS and KPMG. His particular areas of expertise include corporate restructuring, mergers and acquisitions, succession planning and Revenue audits.



MARIE FLYNN is a Tax Director in PwC's Private Client Team with over twenty years' experience in UK and Irish taxation, both in practice and with HMRC in the UK. She specialises primarily in advising management teams on all aspects of share incentivisation (including share valuations) and high net worth individuals/families and partnerships on a variety of planning/structuring projects. Marie is a Chartered Tax Adviser (CTA) and has written articles and presented in Ireland and the UK on a variety of topics including management incentivisation, tax issues for non-domiciled individuals, professional partnerships and real estate. Marie is a member of the PwC European Management Shareholder Network and the PwC International Private Wealth Network. Marie is also an active Council Member of the Irish Pro-Share Association.



ANNE GUNNELL is Director of Tax Policy and Representations at the Irish Tax Institute and a Chartered Tax Adviser (CTA). Anne leads the Institute's work on both domestic and international tax policy and administration issues; formal submissions; bilateral meetings with Revenue, government departments, members of the Oireachtas, state agencies and international bodies, including the European Commission, the IMF and the OECD and overseeing all Branch Network meetings. She represents the Institute at Main TALC and on the TALC BEPS subcommittee which focuses on the implementation of international tax developments in Ireland. Anne is the Institute's Fiscal Representative for direct tax issues at CFE Tax Advisers Europe.



DR MIKE HARRIS is a Partner in Grant Thornton's advisory practice and leads the provision of cyber security services. He advises clients in Ireland and internationally on a range of cyber security, technology fraud and risk issues including cyber security breach response and assessment. He has acted in security leadership roles for both UK and Ireland based financial institutions. In addition, he has held technology roles in an Irish mobile telecommunications operator and a global management consultancy based in Germany. He has completed a Ph.D. at the Max Planck Institute for Solid State Research in Germany. Mike lectures on online security and fraud at University College Dublin's Cybercrime Institute as part of the M.Sc. in Digital Investigations. Mike is a member of ISACA and is a Certified Management Consultant.



MARY HEALY is Senior Representations Manager at the Irish Tax Institute and a Chartered Tax Adviser (CTA). She is involved in all of the Revenue-facing aspects of the Institute's work in relation to indigenous businesses; at TALC, the Branch Network, bilateral meetings, formal submissions, and day-to-day engagement on tax administration issues. Mary is also involved in preparing TaxFax and other Institute communications covering the latest developments and practical information on tax administration.



DEIRDRE HOGAN is a Partner in the Indirect Tax practice of EY Ireland. She joined the firm in 2006 and specialises in helping companies manage their Irish and global indirect tax obligations. She is a Chartered Tax Adviser (CTA) with over 15 years' experience in Irish and international indirect tax. Deirdre spent almost 7 years in the US working with multinational companies helping them set up and manage their indirect tax functions and meet their planning and compliance requirements globally. She has worked with a wide variety of clients at EY, and gained experience of technology and communications, life sciences, manufacturing/retail/distribution, and aerospace.



FEARGAL KENZIE is a Tax Director with Deloitte, specialising in Tax Controversy. Feargal has extensive experience in advising clients on all areas of Revenue audits and interventions and also negotiating tax/duty settlements with Revenue. He specialises in managing the Revenue audit/intervention engagement journey from start to finish. In addition, he assists corporate groups in preparation for and attendance at Co-operative Compliance Framework annual risk review meetings and self-reviews. He also advises clients through the Tax Appeals Commission/Court process and is a Chartered Tax Adviser (CTA).



SARAH KIRWAN is a Senior Manager in PwC's Private Client Team with over eight years' experience in Irish taxation. Sarah is a Chartered Tax Adviser (CTA) and specialises primarily in advising high net worth individuals across a number of tax heads. Sarah has a particular focus on the management incentivisation area (including share valuations) for key employees/senior management for both owner-managed business and large corporates. Sarah is a member of the PwC European Management Share Network and has vast experience in the area of incentivising key employee/senior management in a number of locations across the globe.



LAURA LYNCH is a Tax Partner with Laura Lynch & Associates, a strategic tax and business advisory firm advising private and corporate clients on all aspects of tax, financing and structuring issues, including succession planning, business angel investment, EIS, corporate restructures and employee share schemes. She is an FITI Chartered Tax Adviser (CTA), a Council Member of the Irish Tax Institute and a Fellow of Chartered Accountants Ireland. Laura has lectured extensively for the Irish Tax Institute, co-authored four editions of *FINAK - Finance Act Explained* and chaired the TALC Direct/Capital Taxes sub-committee for the Institute in 2020.



PHILIP MURPHY is a Tax Director with over 12 years' experience in KPMG's Financial Services Tax practice. He specialises in corporate tax and has particular experience advising Irish and international clients in the asset management and aviation sectors across a broad range of corporate tax issues including cross border tax structuring, mergers and acquisitions, capital market transactions and international tax developments. Philip is a Chartered Tax Adviser (CTA) and Chartered Accountant (ACA).