

Advanced tax issues for insolvency professionals



2015

LONDON // 3 FEBRUARY 2015 // COPTHORNE TARA KENSINGTON
MANCHESTER // 10 MARCH 2015 // RENAISSANCE HOTEL

13.00 - 16.10

Registration starts at 13.00

2 Hours CPD
accreditation

Half day
course



Cathryn Williams
Squire Patton Boggs LLP



Scott Brady
EY LLP

Course overview

"The uncertain economic environment has led to a number of formal appointments and consensual and non-consensual debt restructuring transactions in the UK and cross-border. Tax issues impact all types of restructuring and insolvency situations."

This course will provide an advanced groundwork of tax issues for insolvency practitioners and will provide an in-depth analysis of tax issues to be considered by practitioners. The course will aim to provide delegates with detailed considerations of the key tax issues and principles arising from the trading, restructuring or sale of distressed businesses.

Industry specialists will provide insight into the following issues:

- A detailed consideration of debt restructuring
- Cessation of a trade
- Post appointment and additional tax considerations
- An advanced update on VAT

Who is this course aimed at?

This course is aimed senior level managers and partners who frequently deal with tax issues arising in insolvency or distressed context.

Speakers

- **Cathryn Williams** leads the London restructuring and insolvency practice group of Squire Patton Boggs. Cathryn acts for banks, financiers, insolvency practitioners, office holders, corporates, private equity houses and distressed lenders in all aspects of non-contentious and contentious insolvency, restructuring, fraud and asset recovery and has a wealth of experience in these areas.
- **David Gregory** is a tax director at Grant Thornton LLP, specialising in providing tax advice on all aspects of distressed transactions, including advising on the tax aspects of debt restructuring, the acquisition and disposal of distressed businesses or assets and the restructuring and refinancing of distressed businesses, whether through consensual deals or formal insolvency processes.
- **John Hinton** is an associate director at EY LLP for transactional tax and restructuring. John specialises in corporate debt structuring and restructuring, diligence and tax advisory projects on behalf of corporate, banking and private equity clients.
- **Mairead Warren De Burca** is a VAT director at EY LLP. Since 2006 she has specialised in private equity and corporate transactions, and restructuring and insolvency projects.
- **Mark Prior** is a senior associate in the restructuring and insolvency practice at Squire Patton Boggs. His expertise covers commercial and legal issues involved in corporate recovery, turnaround and reconstruction, and insolvency law. Mark advises on all formal insolvency processes and has considerable experience in preparing and negotiating legal documentation for the sale or purchase of businesses and assets, and distressed property portfolios.
- **Philip Ridgway** joined chambers when he returned to the Bar in June 2007. He advises on all areas of revenue law, both corporate and personal, but has a particular interest in corporate tax matters including, acquisitions and disposals, reconstructions and demergers, MBOs, returning capital to shareholders, s425 schemes, SDLT, stamp duty and SDRT.

13.00	Registration and coffee
13.30	<p>Chairman's introduction</p> <p>Cathryn Williams, Squire Patton Boggs LLP (London) Mark Prior, Squire Patton Boggs LLP (Manchester)</p>
13.35	<p>Debt restructuring</p> <p>This session will provide an overview of the deemed release rules on taking ownership of debt as part of a consensual restructuring as well as tax issues to consider on a refinancing of debt. It will also touch upon the tax treatment of a swap and the potential impact of new UK GAAP.</p> <p>David Gregory, Grant Thornton UK LLP</p>
14.10	<p>Cessation of a trade</p> <p>This session will cover the following:</p> <ul style="list-style-type: none"> • Key issues that determine whether trading after an appointment of an insolvency practitioner is occurring and why this is important • Practical overview of issues that may help evidence a trade is continuing <p>Philip Ridgway, Temple Tax Chambers</p>

14.35	<p>Post appointment – additional tax considerations</p> <p>This session will consider tax consequences of a disposal of assets and / or shareholding including:</p> <ul style="list-style-type: none"> • Potential tax leakage and availability of losses • Purchase price allocation • Practical tax issues to consider when negotiating the SPA <p>John Hinton, EY LLP</p>
15.05	Coffee break
15.35	<p>VAT</p> <p>This session will cover</p> <ul style="list-style-type: none"> • VAT on sales, including property and TOGCs • VAT recovery on transaction costs • Exit readiness <p>Mairead Warren de Burca, EY LLP</p>
16.05	Chairman's close

This half day course runs back-to-back with **Core Tax for Insolvency Practitioners**. For more information about this course, please refer to the brochure.

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CPD Accreditation

The course constitutes structured CPD to meet the requirements of the Association of Certified Chartered Accountants (ACCA), the Institute of Chartered Accountants in England and Wales (ICAEW), the Insolvency Practitioners Association (IPA), the Institute for Turnaround (IFT), Solicitors Regulation Authority (SRA) and the Bar Council.

Solicitors Regulation Authority/Bar Council CPD accreditation
Ref: ABR/RTAB – 2 hours

Key sponsorship partners



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