

# World FreeZone Convention



## INVESTMENT, TAX AND TRADE ISSUES AFFECTING FOREIGN DIRECT INVESTMENT & SPECIAL ECONOMIC ZONES

**Two 'BACK TO BACK' 1 ½ DAY SEMINARS:  
11-12-13 December 2017 – LONDON, UK**

### **INTRODUCTION**

These Seminars will review both current tax and investment reforms that affect the design, operation and operation of SEZs across the world.

Although tax treaty law and the international investment law *prima facie* appear to be two separate law regimes, it had been found that quite a number of issues and disputes related to tax disputes have been determined in the international investment tribunals in recent years and the claimants made the claims through investment law treaties rather than tax treaties between states.

This suggests that there is a certain degree of overlap between tax and investment treaties, which will be explored in the 2 one and a half-day seminars.

In addition, these two fields of international economic policy, which include customs, are going through massive changes which both create opportunities of SEZs, governments and companies but also risks associated to the difficulties in always ensuring a proper implementation of the international rules.

**DELEGATES may choose to attend either Seminar 1 or 2 or both.**  
(See Administrative Details below for fee options).

### **WHO SHOULD ATTEND**

The Seminars will be of value to national officials dealing with policy matters which relate to investments and special economic zones policies. They are also important for Zone Authorities, Investment Promotion Agencies, specialist and professional advisers and others working in the field of Foreign Direct Investment. The trade issues, risk assessment, customs and other commercial considerations concern multi and trans-national corporations and investors. Zone operators, customs authorities and other specialists - including legal, tax and trade advisers - will need to understand the practical effects on Zone management. These include the increased use of international internet related systems.

## SPEAKERS

The Two Seminars will be introduced by **Graham Mather C.B.E.**, Chairman of World Free Zone Convention. Graham is a lawyer by training who sits on two major UK Regulatory Boards as well as being President of the European Policy Forum.

The **SPEAKING PANEL** will be led by **Julien Chaisse**, Professor at The Chinese University of Hong Kong (CUHK), Faculty of Law. He is an award-winning scholar of international law with a special focus on the regulation and development of economic globalisation. His teaching and research include international trade/investment law, international taxation, law of natural resources, and Internet law. In addition to his professorship, Dr. Chaisse is a well-experienced arbitrator and a leading consultant to international organisations, governments, multinational law firms, and private investors. He is also member of some of the world's foremost organizations, including the World Economic Forum's International Trade and Investment Council.

Julien will be joined by a number of other speakers including:

**Romero J.J. Taveres**, originally from Brazil, is based in Vienna and is affiliated to the University of Economics and Business (WU). His prior experience includes international tax advisory services both in a corporate and professional services environment.

**Rahul Donde**, originally from India, specializes in international commercial and investment arbitration. He acts as counsel, secretary and assistant of the arbitral tribunal in international arbitration proceedings. He has specific experience in disputes relating to utilities, natural resources (including oil and gas and renewable energy) and joint venture/shareholder agreements in different jurisdictions. He has been involved in high-profile disputes arising under the NAFTA and BITs as well as under complex long-term contracts.

## SEMINAR ONE

### USING INVESTMENT TREATIES TO MANAGE RISK AND IMPROVE RIGHTS

This Seminar focuses on the role of international investment agreements (IIAs) to manage risks and improve companies' rights in the context of SEZs. There are more than 3,000 international investment treaties in effect worldwide.

The international investment treaties, also referred as IIAs, are treaties between states for the purpose of regulating investment, protecting investors and liberalizing foreign direct investment.

This Seminar further discusses the two main purposes served by IIAs. Firstly, they provide substantive law to protect investors' investment in the host state with clauses regarding the compensation from expropriation and FPS, and also avoiding discrimination or unfair treatment by the host state with the inclusion of the clauses of MFN, NT and FET.

Secondly, BITs provide a neutral dispute resolution mechanism and effective foundation for the nationals and states if a disagreement arises because they can put their claims in front of the international arbitration court and are not limited by the national domestic courts which may intend to make an unfavourable judgement against foreign investors.

## DAY ONE

- ◆ Introduction to Investment Law Policy – Latest developments as they affect investment decisions
- ◆ Options arising from revocation of licences or government policy changes

### Lunch

- ◆ Effects on Free and Special Economic Zones – some recent case studies (mention European, South American, African, and Asian examples)
- ◆ Panel discussion

## DAY TWO (a.m.)

- ◆ Rights of foreign investors
- ◆ Management of Disputes - Making complaints – Mediation and Arbitration procedures that work
- ◆ Next generation of Treaties (TPP, RCEP, TTIP...) and their probable effects

**End of Seminar One – Lunch with participants from Seminar Two**

## SEMINAR TWO

### **NEW INTERNATIONAL TAX & CUSTOMS CHANGES - EFFECTS ON ZONE MANAGEMENT AND INVESTOR ATTRACTION**

On the 5th of October 2015, the Organization for Economic Cooperation and Development (hereinafter “OECD”) published the final Base Erosion and Profit Shifting (hereinafter “BEPS”) package for reform of the international tax system to tackle tax avoidance after two years of work on the 15-point action plan.

This Seminar explains what issues are addressed by the BEPs. How the BEPS is being implemented and how it will impact both SEZs and foreign investments. Due to the fact that over 60 countries have participated in the project, the BEPS project will take the international cooperation in tax matters to a new level, and the measures represent fundamental changes to international tax rules.

The OECD declared that the main purpose is to put an end to double non-taxation, facilitate a better alignment of taxation with economic activity and value creation, and when fully implemented, these measures are expected to render BEPS-inspired tax planning structures ineffective

### **DAY ONE Lunch (with participants from Seminar One)**

- ◆ The new BEPS regime and how it affects tax incentives and investment decisions
- ◆ Update on the current BEPS implementation (who are the front runners? Where do others stand?)
- ◆ Negotiation and Dispute settlement

## DAY TWO

- ◆ Transfer Pricing Aspects of International Tax Structuring

### Lunch

- ◆ Customs Valuation: Principles and Relation to Transfer Pricing
- ◆ Rules of origin and traceability – Managing risks within Zones

### End of Seminar Two

## ADMINISTRATIVE DETAILS

**VENUE** The Seminars will be held at a Central London, venue to be confirmed.

**REGISTRATION** To register please complete the form below and send to the fax number indicated or register online, or send an email to [info@freezones.org](mailto:info@freezones.org)

### REGISTRATION FEES Seminar One or Two

1,250 GBP which includes the full programme as shown on the brochure. The fee also includes two seminar lunches and refreshment breaks. All delegates will receive a Certificate of Completion.

**Attendance at both Seminars** 2,250 GBP which includes the full programme as shown on the brochure. The fee also includes three seminar lunches and refreshment breaks. All delegates will receive a Certificate of Completion.

**DISCOUNTS** A 15% discount for each second and subsequent delegate from the same organisation is available.

**DELEGATIONS** Further discounts are available to delegations of 4 or more participants. Please check with the organisers for more information.

**HOTEL ACCOMMODATION** A list of suitable hotels will be mailed to each participant on registration. Delegates are also free to make their own arrangements.

**VISA SUPPORT** If you require visa support this can be arranged for participants from bona-fide organisations.

**ON RECEIPT OF YOUR REGISTRATION WE WILL FORWARD OUR INVOICE FOR PAYMENT BY BANK TRANSFER. FEES ARE PAYABLE IN ADVANCE – THE ORGANISERS RESERVE THE RIGHT TO REFUSE ADMISSION IF PAYMENT HAS NOT BEEN RECEIVED. Please contact us before the event if for any reason you have not received written acknowledgement of your registration.**

**Terms and Conditions** Our full terms and conditions including Cancellation Policy are found on [www.freezones.org](http://www.freezones.org)

*We look forward to seeing you in London.*

**WFZC** *The authoritative meeting place for the world's free and special economic zones*

**35 Spring Gardens, London SW1A 2BA, UK**

Tel. +44 207 839 1334

Email: [info@freezones.org](mailto:info@freezones.org)

Website [www.freezones.org](http://www.freezones.org)

## REGISTRATION FORM

DATE:

2017

### TO: WORLD FREE ZONE CONVENTION

35 Spring Gardens, London SW1A 2BA, UK

Tel: +44 207 839 1334

Email: [info@freezones.org](mailto:info@freezones.org)

Fax: +44 870 131 9578

### SEND ONE FORM FOR EACH DELEGATE BY FAX OR BY EMAIL

*Please register the following to the 2017 LONDON SEMINARS (tick boxes)*

Seminar One (11<sup>th</sup>/12th December)

Seminar Two (12<sup>th</sup>/13th December)

Both Seminars (11<sup>th</sup>/12th/13th December)

First Name	Last Name	Position
Organisation	Abbreviation	
Address	P.O.Box	
City	Postcode	Country
Telephone	Fax	Email
Contact name	Position	Contact email

Signed

Full name

### *Media and information Partners*

