



AMBASSADE  
DU GRAND-DUCHÉ DE LUXEMBOURG  
EN FÉDÉRATION DE RUSSIE

**ERNST & YOUNG**  
*Quality In Everything We Do*

**ALLEN & OVERY**

**Speakers:**

**H.E. Gaston Stronck**

Ambassador, Embassy of the Grand Duchy of  
Luxembourg in the Russian Federation

**Bart Van Droogenbroek**

Partner, Ernst & Young

**Vladimir Zheltonogov**

Partner, Ernst & Young

**Olivier Bertrand**

Senior Manager, Ernst & Young

**Nicolas Fermaud**

Associate, Allen & Overy

**Victor Kalgin**

Manager, Ernst and Young

**Date and time:**

Thursday, March 31, 2011,  
from 15:00 p.m. till 18:00 p.m.  
Registration starts at 14:30 p.m.

**Location:**

Ernst & Young office, Moscow, Sadovnicheskaya  
Nab, 77, bld. 1

**Please confirm your participation before March  
27, 2011 to:**

Elena Gureeva by e-mail:  
Elena.Gureeva@ru.ey.com

Participation in the seminar is free of charge.

**The number of participants is limited to 100  
persons.**

**The language of the seminar will be English.**

# Luxembourg Seminar on Intellectual Property

## Dear Colleagues!

On behalf of the Luxembourg Embassy in Russia, Ernst & Young and Allen & Overy we would like to invite you to the event on tax and legal aspects of Luxembourg as a location for structuring of use of intellectual property (IP).

During the seminar we will focus on the following aspects:

- **Luxembourg as a prime business location**
  - ▶ General framework
  - ▶ Economic situation
- **Luxembourg IP tax regime**
  - ▶ Why Luxembourg?
  - ▶ Luxembourg IP regime
  - ▶ Beneficiaries of the regime
  - ▶ Description of the regime
  - ▶ Points of attention for the applicability of the regime
  - ▶ Setting up the IP structure
  - ▶ Summary of the benefits
  - ▶ Comparative overview of IP regimes in several countries
- **Typical IP structures and their “pros” and “cons”**
  - ▶ Setting up an IP company benefiting from the IP regime
  - ▶ Structured approach towards IP planning
- **Luxembourg IP tax planning in the Russian context**
  - ▶ Russia inbound royalty planning (profits tax, withholding tax and VAT)
  - ▶ Russia outbound royalty planning and profit repatriation considerations

We would be happy to welcome you among the participants.

Sincerely,

Vladimir Zheltonogov  
Partner, Ernst & Young

Nicolas Fermaud  
Associate, Allen & Overy