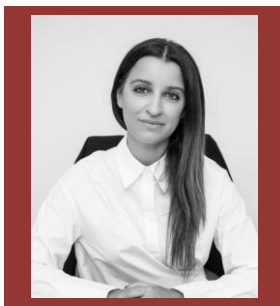


The Cyprus Fiduciary Association proudly presents:

Seminar 3 Substance and Control in Cyprus

Wednesday, 5th April 2023, 09:00-12:30, Venue: Live Online (Zoom)

Featured Speakers



Androulla Poutziouris
European Legal Training Center
(ELTC)

#CYFAseminars2023

The Seminar will be conducted in the English Language
Participants will receive a Certificate of Attendance for
up to 3 CPD Unit Hours.

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Seminar Aims and Objectives

The Cyprus Fiduciary Association is organizing an independent live online seminar titled **“Substance and Control in Cyprus”**.

Aims and Objectives:

This seminar aims to provide participants with the skills, knowledge and awareness of the following:

Participants will gain Knowledge:

1. regarding the importance of substance and management and control in Cyprus Companies.
2. regarding the contents of the substance, management and control test
3. regarding the Cypriot regulatory provisions
4. regarding the case law relating to management, substance and control.
5. regarding the substance risk factors.
6. regarding inland revenue approaches in Cyprus and abroad.
7. regarding the new European approaches to substance and control.

Participants will gain the skills:

1. to apply the substance, management and control test – both in theory and in practice.
2. to analyse the management and corporate governance of client companies and identify any risk factors.
3. to implement policies and procedures and to better advise clients in relation to challenges relating to substance, management and control.
4. to identify the problems relating to dual residency of clients.
5. to better advise and protect clients from the challenges ahead relating to the ATAD-3.

The seminar will comment on the following Laws/Regulations/Directives/Guidelines/EU Proposals:

- Income Tax Law No. 118(I) of 2002.
- The Double Tax Treaty
- Common law and equitable principles found in case law.
- Companies Law Cap 113
- The Third Anti-Tax Avoidance Directive (ATAD 3)

- The Organisation for Economic Co-operation and Development Model Treaty

Program/Agenda

08:45 – 09:00	Registration	Speaker
09:00 – 10:30	<ul style="list-style-type: none"> • The importance of the substance of a company (1h) • The Substance Management and control test • Cyprus Substance Rules • Important Substance Risk factors • The case of De Beers Consolidated Mines Ltd – establishing substance • Management and control of the business of the company vs. Shareholders Control of the company • Management and control of the business vs. Place of business (trading and business operations) 	Androulla Poutziouris
10:30 – 10:45	Break	
10:45 – 12:15	<ul style="list-style-type: none"> • Management and control vs. Nominee Directors • Management and control vs. appointment of directors outside of Cyprus • The real exercise of management and control • The issue of dual residency • The Cyprus Inland Revenue approach vs. Foreign Inland Revenue approach • ATAD-3 – The challenges ahead 	Androulla Poutziouris
12:15 – 12:30	Q &A Session	

The seminar is addressed primarily to all interested professionals that need to gain knowledge on the rules governing substance and control of companies in Cyprus as well as the key regulatory and compliance challenges associated with it.

Maximum number of participants: 50 seats. Registrations will be handled on a first come first served policy.

To receive a certificate of attendance, each registered participant must login and attend the full duration of the live-online seminar. Participants should also complete the relevant evaluation form. The seminar will be recorded for internal use purposes.

For registrations, please complete and sign the registration form and submit to the Cyprus Fiduciary Association e-mail address info@cyfa.org.cy by **Monday, 3rd April 2023**.

Click [here](#) to review the CYFA Payment & Refund policy.

Speaker Bio

Androulla Poutziouris

Mrs Androulla Poutziouri is a qualified Advocate and a Member of the Cyprus Bar Association. Mrs Poutziouri obtained a double LLB Law degree in English and French Law from Paris II Panthéon-Assas University and the University of Birmingham. She then proceeded to obtain an LLM Degree in International Legal Practice from the University of Law in the UK. She is bilingual in Greek and English (native), with working proficiency in French.

Androulla has been a lecturer of law for the last 14 years. She has taught for some of the most prestigious legal education providers in the UK including the LLB Law Degree offered in Cyprus by the University of Wales, The University of the West of England and the University of London (a consortium of top London universities offering an LLB (HONS) Law Degree through a registered teaching center in Cyprus). Regarding the LLB law degree, Androulla has taught many subjects including, Equity and Trusts Law, European Union Law, Property Law, Company law and Criminal and Contract law (amongst others).

Androulla has taught law in the British Bases in Cyprus and has offered courses Cyprus-wide as an accredited lecturer for the National Association of Licensed Paralegals, the Chartered Institute of Legal Executives and Cambridge Law Studio. Androulla is also currently an Executive Director for Cambridge Law Studio for the Mediterranean region. Androulla has been accredited as an 'expert in the field of law' (διακεκριμένος εκπαιδευτής) by the Human Resource and Development Agency in Cyprus and regularly undertakes training of lawyers and administration staff in Cyprus with the European Legal Training Center [ELTC] (of which she is the founder and director). ELTC is a training center accredited to offer continuous professional development courses by the Cyprus Bar Association and provides funded training courses to upskill members of the legal sector. Androulla is known for her personable and professional approach to training and education and regularly receives excellent reviews from trainees as a result. Some of the courses that Androulla has taught on behalf of ELTC include in the corporate sector include Introduction to Company Law and Practice, Drafting and advising clients on Shareholder Agreements, Drafting and Advising clients on Share Purchase Agreements.

You can view the reviews Androulla receives on the website: www.eltrc.com



CYPRUS FIDUCIARY ASSOCIATION

Cyprus Fiduciary Association

Seminar 3 - "Substance and Control in Cyprus" | Wednesday 5th April 2023 | Live Online - Zoom

Registration Form

1. Name of Company Regulatory Authority CYFA Member Non-Member

☐☐

Postal Address

Telephone no

2. Please add below the details of the participants and the town they will attend the seminar:

S/N	Name/ Surname	Email Address	Limassol

3. Fees

CYFA Members €70 + VAT
ICPAC, CyBAR, STEP Cyprus Members €105 + VAT
Non-Members/Others €140 + VAT

Total Fees €

4. Type of payment (all payments should be made prior to the event)

- Cheque ☐ Name of bank and cheque no.: _____
- Bank transfer ☐

Bank	Account No.	Swift Code	IBAN
Bank of Cyprus	357003026375	BCYPCY2N	CY52002001950000357003026375
Hellenic Bank	240-01-579787-01	HEBACY2N	CY 73005002400002400157978701

Note: Please add the name of your company in the description of the transfer payment

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Name

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Signature

CYPRUS FIDUCIARY ASSOCIATION

6, Emmanuel Roide Street, 4th floor, Office 402, 1095, Nicosia | P.O. Box 58159, 3731 Limassol, Cyprus
Tel.: +357 22256263 Fax: +357 22256364 | info@cyfa.org.cy | www.cyfa.org.cy