



Henk Goossen

cee tax management

Czech and CEE planning techniques & structures

Central & Eastern Europe

one region ?

- 28 different countries / tax systems
- commonalities:
 - flat tax systems
 - high social security
 - inexperienced bureaucracy
 - form-over-substance
 - self assessment





international structures

- **holding / investment**
 - **Cyprus, Netherlands**
- **off-shore**
 - **bank account, company, substance**
- **transfer pricing**
 - **inbound**



Czech Republic

personal tax

- capital gains exemption
- social security
- employees
- personal holding company
- personal services company
- ‘Schwartz’ system

Czech Republic

other taxes

- Value Added Tax
 - European Union
 - admin / reclaims
- Real Estate Transfer Tax
 - property company





Financial crisis

Impact on CEE

- Russian stock market
- stability of Ukrainian hryvnia
- Latvian property crash
- Hungarian foreign currency loans
- Property developers exposed
- 'safe' haven for investments ?
- general economic slowdown
- vulture funds / investors