Geneva Management Group
Switzerland / Luxembourg: appropriate hubs for investments in today's environment

Date: June 6-7, 2016

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Geneva Management Group

WHO WE ARE
Who We Are

Entrepreneur-owned, Client-centric

• GMG was founded in 2000 by the current Chairman and the CEO
• The Group is a privately-owned Financial Services Provider
• Main Divisions:
  • Asset Management and Support Services
  • Real Estate
  • Wealth Management
  • Corporate Services
  • Corporate Advisory
  • Pension and Fund Administration
• Team (approx. 100) of highly specialised professionals
• Offices in well-regulated jurisdictions and expanding
Corporate Governance

- **All Shareholders** are on the Executive Board
  - Majority Based in Geneva
  - Others in Mauritius and South Africa

- **Key Group Governance Committees:**
  - **Review committee**
    - appointed by the board
    - deals with all compliance issues
    - independent
    - referral of issues open to all employees

  - **Pricing committee**
    - appointed by the board
    - reviews all matters concerning pricing issues
    - input to budget process and strategic discussions

- **Internal Audit and Compliance Functions**
  - Local boards: local boards at operating entities level

Regulatory Bodies

- **Geneva Management Group (Switzerland) S.A.** is a qualified financial intermediary and a member of the Self-Regulatory Organisation for Asset Managers “OAR-G” in Switzerland.

- **GMG Trust Ltd** is licensed as a Trust and Management Company in Mauritius. It operates under a Management License and is regulated by the Financial Services Commission of Mauritius.

- **GMG Fund Services Ltd** is a Collective Investment Scheme Manager (CIS Manager) licensed by the Financial Services Commission of Mauritius.

- **Geneva Management Group (BVI) Ltd** operates under a Trust and Management License and is regulated by the Financial Services Commission of the British Virgin Islands.

- **GMG Pension Administration Services Ltd** is a Pension Scheme Administrator licensed by the Financial Services Commission of Mauritius.
Our Services

01. Wealth Management  
02. Corporate Services  
03. Corporate Advisory  
04. Asset Management and Support Services  
05. Real Estate  
06. Pension and Fund Administration
GMG Investment Opportunities

- Property development in central London
- Investment in Spanish property
- Private equity investments
- Early stage investments in Africa
London Real Estate

A unique residential conversion opportunity

Located in the heart of Hampstead Village, Wells Court is a highly-attractive residential conversion opportunity. Core Properties Ltd, a Geneva Management Group (GMG) associated company, has secured this unique asset and aims to syndicate this investment opportunity to a select number of clients. The Principals of GMG will be investing at least one third of the equity.
London Real Estate

Project deal data

- Project cost: £18,865,594
- Equity invested: £13,865,594
- Bank debt: £5000,000
- Estimated selling price: £31,541,709
- Expected return on equity: 66.58%
- Project IRR (3 year scenario): 19.81%
- Project IRR (5 year scenario): 16.23%
- Post renovation yield: 6.88%
Spanish Real Estate

A unique opportunity to invest in Spanish property at attractive valuations

Investment Strategy:
• Residential constructions or refurbishment
• Madrid and Barcelona with a complementary exposure to the Mediterranean coast
• Emphasis on 2-3 year exit strategies through acquisition of unfinished products
• Leverage on local network to source attractive off-market opportunities and build proprietary deal flow
Spanish Real Estate

Project deal data

Opportunity

Unique buying opportunity in a growing economy & recovering real estate market

Target Return

Project IRR (3-4 year scenario): 15% - 25%

Value Proposal

Extensive market knowledge & experience plus Joint Ventures with local partners

Team and Manager

Focused and experienced team combining RE expertise and finance background

Our Edge

Team secured over €150M through deep market knowledge and network
SWITZERLAND / LUXEMBOURG: APPROPRIATE HUBS FOR INVESTMENTS
Switzerland for corporations

- Taxes are levied at the federal and cantonal/communal levels
  => 26 cantons, 26 tax rates

- Companies are subject to corporate tax on worldwide income
  => between 12% and 24% (Federal 8.5% and cantonal / communal)
  => national flat rate between 13 to 14% in 2016/2017

- No Foreign-exchange controls rule

- No statutory transfer-pricing rule
  => OECD guidelines are accepted
  => Tax rulings are common

- More than 50 Double tax treaty agreements (incl. Russia, Ukraine)
Dividends

- Dividends received are taxable as ordinary income
  => participation exemption rules (holding >10% or CHF 1 mio)

- Dividends paid suffer from a WHT at a rate of 35%
  => qualifying dividends may apply for the Net Remittance Procedure

Capital gain tax

- Capital gains are generally taxed as ordinary business income
  => participation exemption rules (holding >10% and 12 months)
Lump Sum taxation regime

- Special regime offering foreign individuals the possibility to be taxed on the cost of living in Switzerland
  - first time residing in Switzerland or returning to Switzerland
  - no gainful activity in Switzerland
Luxembourg

- Taxes are levied at the country and communal levels
- Companies are subject to corporate tax on worldwide income
  => 21% + 7.5% (average of the municipal tax)
- Capital gains are generally taxed as ordinary business income.
  => participation exemption rules (EU or CH Co, holding > 10% or EUR 1.2 mios & 12 months)
- Dividends received are taxable as ordinary income.
  => participation exemption rules (EU or CH Co, holding > 10% or EUR 1.2 mios & 12 months)
- Dividends paid suffer from a WHT at a rate of 15%
  => participation exemption rules (EU or CH Co, holding > 10% or EUR 1.2 mios & 12 months)
- More than 75 Double tax treaty agreements (incl. Russia)
Luxembourg

- **The SOPARFI**
  A Soparfi is an ordinary commercial entity governed by common law, specifically the 1915 Law on commercial companies. It does not benefit any special tax regime and is fully taxable. It can be incorporated under many legal forms such as S.A. or S.à r.l. for the most common practice.

- **The Securitization vehicle**
  A securitization operation consists of bringing together a group of assets that produce a predictable cash flow or grant the right to a future cash flow, transforming these assets into securities (shares, bonds or other securities), and selling these securities to investors.

- **The Specialised Investment Fund**
  The Specialised Investment Fund (SIF) is a regulated, operationally flexible and fiscally efficient multipurpose investment fund regime for an international, institutional and qualified investor base.

- **The Special Limited Partnership**
  A more attractive structure for fund managers, in particular for private equity managers. The SCSp enables the structuring of Luxembourg funds in a very similar way to the limited partnership under English common law, which is often considered to be the industry standard in private equity.

- **The Société de Gestion de Patrimoine Familiale**
  The société de gestion de patrimoine familial is a vehicle designed for the management of individuals’ private wealth.
Disclaimer

This presentation is for informational purposes only, and does not represent an offering or an opinion of any kind. The information in this document derives from internal as well as external sources considered to be trustworthy and is given without liability on the part of GMG or its representatives.
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