Iceland

OFFSHORISATION of an economy

Sigrún Davídsdóttir

Facts and figures

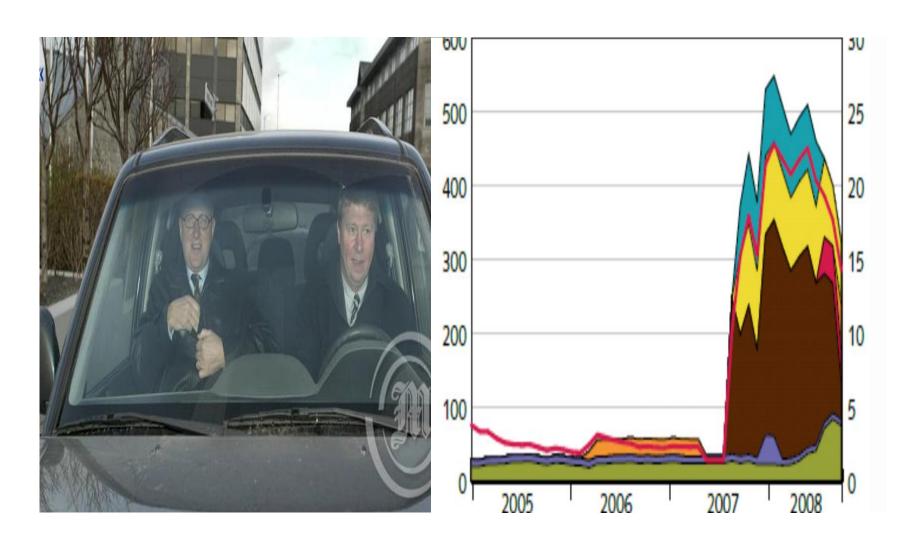
Iceland – republic since 1944

330.000 inhabitants

GDP per capita: OECD – nr. 13 / 2010

The '08 saga – in 2 pictures

The '08 saga – in two pictures



1990s: major privatisations / politics

- 1990s: major privatisations / politics
- 1998-2002: banks privatised

- 1990s: major privatisations / politics
- 1998-2002: banks privatised
- 1998-2008: banks expanded abroad, i.e. Luxembourg, London, Nordics

- 1990s: major privatisations / politics
- 1998-2002: banks privatised
- 1998-2008: banks expanded abroad, i.e. Luxembourg, London, Nordics
- -2008: companies owned by banks' big shareholders/clients expand abroad

- 1990s: major privatisations / politics
- 1998-2002: banks privatised
- 1998-2008: banks expanded abroad, i.e. Luxembourg, London, Nordics; '08: 10 x GDP
- -2008: companies owned by banks' big shareholders/clients expand abroad
- GLORY & SUCCESS...

What Icelanders didn't know

What Icelanders didn't know

Extensive offshorisation – of companies & private individuals

33073

MEMORIAL

Journal Officiel du Grand-Duché de Luxembourg



MEMORIAL

Amtsblatt des Großherzogtums Luxemburg

RECUEIL DES SOCIETES ET ASSOCIATIONS

Le présent recueil contient les publications prévues par la loi modifiée du 10 août 1915 concernant les sociétés commerciales et par loi modifiée du 21 avril 1928 sur les associations et les fondations sans but lucratif.

 $C - N^{\circ} 690$

25 septembre 1998

Oct. 2008: banking collapse

- Oct. 2008: banking collapse
- Dec. 2008: Special Investigative Comm.

- Oct. 2008: banking collapse
- Dec. 2008: Special Investigative Comm.
- Dec. 2008: Office for Special Prosecutor

- Oct. 2008: banking collapse
- Dec. 2008: Special Investigative Comm.
- Dec. 2008: Office for Special Prosecutor

- Stories, rumours & media reports
- April 2010: SIC reports
- 20+ charges brought by OSP

 Private individuals: 250-300 people; min. ISK50m / £277.000

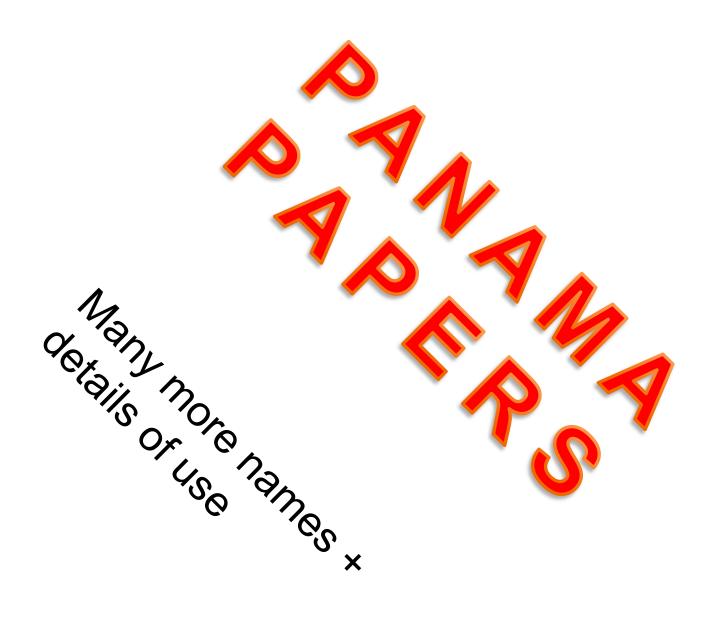
 Private individuals: 250-300 people; min. ISK50m / £277.000

 Unique Icelandic offshorisation: more wide-spread than anywhere else

 Private individuals: 250-300 people; min. ISK50m / £277.000

 Unique Icelandic offshorisation: more wide-spread than anywhere else

Enriched vocabulary: "Tortola-company"



Examples of use

Companies

Individuals

- Example 1:
- Meidur & Gaumur

Meidur

COMPAGNIE FINANCIERE SCANDINAVE HOLDING S.A., Société Anonyme.

Registered office: L-1417 Luxembourg, 18, rue Dicks.

STATUTES

In the year one thousand nine hundred and ninety-eight, on the twenty-second day of June. Before Us, Maître Paul Frieders, notary residing in Luxembourg.

There appeared:

1. - QUENON INVESTMENTS LIMITED, a company incorporated under the laws of the British Virgin Islands, having its registered office at P.O. Box 3186, Road Town, Tortola, British Virgin Islands

duly represented by Maître Francis Kass, lawyer, residing in Luxembourg, by virtue of a proxy given in Luxembourg, on 18 June 1998.

2. - SHAPBURG LIMITED, a company incorporated under the laws of the British Virgin Islands, having its registered office at P.O. Box 3186, Road Town, Tortola, British Virgin Islands

duly represented by Maître Francis Kass, lawyer, residing in Luxembourg, by virtue of a proxy given in Luxembourg, on 18 June 1998

which proxies, after having been signed ne varietur by the appearing partie and the undersigned notary, shall remain attached to this document in order to be registered therewith.

Such appearing parties, acting in their here above stated capacities, have drawn up the following Articles of Incorporation of a public limited company which they declare organised among themselves.

Gaumur

COMPAGNIE FINANCIERE POUR L'ATLANTIQUE DU NORD HOLDING S.A., Société Anonyme.

Registered office: L-1417 Luxembourg, 18, rue Dicks.

STATUTES

In the year one thousand nine hundred and ninety-eight, on the twenty-second day of June. Before the undersigned Maître Paul Frieders, notary residing in Luxembourg.

There appeared:

1) QUENON INVESTMENTS LIMITED, a company incorporated under the laws of the British Virgin Islands, having its registered office at P.O. Box 3186, Road Town, Tortola, Britisch Virgin Islands

duly represented by Maître Francis Kass, lawyer, residing in Luxembourg, by virtue of a proxy given in Luxembourg, on 18 June 1998

2) SHAPBURG LIMITED, a company incorporated under the laws of the British Virgin Islands, having its registered office at P.O. Box 3186, Road Town, Tortola, Britisch Virgin Islands

duly represented by Maître Francis Kass, lawyer, residing in Luxembourg, by virtue of a proxy given in Luxembourg, on 18 June 1998

which proxies, after having been signed ne varietur by the appearing partie and the undersigned notary, shall remain attached to this document in order to be registered therewith.

Such appearing parties, acting in their here above stated capacities, have drawn up the following Article of Incorporation of a public limited company which they declare organised among themselves.

- Example 1:
- Meidur & Gaumur
- Meidur: major shareholder in Kaupthing (1-2); financed by Kaupthing – changing owners
- Gaumur: large exposure to Kaupthing

- Example 2:
- Landsbanki & its 8 offshore companies

- Example 2:
- Landsbanki & its 8 offshore companies

 Set up <u>before</u> 2002; to hold employees' options?

- Example 2:
- Landsbanki & its 8 offshore companies

- Set up <u>before</u> 2002; to hold employees' options?
- Privatisation 2002: larg. owner 42%;

- Example 2:
- Landsbanki & its 8 offshore companies

- Set up <u>before</u> 2002; to hold employees' options?
- Privatisation 2002: larg. owner 42%; 8 OS companies 13.2%

- Example 2:
- Landsbanki & its 8 offshore companies

- Set up <u>before</u> 2002; to hold employees' options?
- Privatisation 2002: larg. owner 42%; 8 OS companies 13.2%... controlled by LÍ man.
 - = major owner hidden +50%

- Example 1:
- Wintris owned by PM's wife; PM Gunnlaugsson w/PoA

- Example 1:
- Wintris owned by PM's wife; PM Gunnlaugsson w/PoA
- Wintris claims in fallen banks = creditor;
 PM negotiating w/creditors
- Wintris capital controls 2008–

- Example 2:
- Hrólfur Ölvisson Progr. Party official

 On-+offshore companies; hidden acquisitions of companies; favourable loans; ties to Progr. ex-MP+minister

- Example 3:
- Bjarni Benediktsson MinFin, Cons.

 Falsson & Co., Seychelles – Dubai inv. Revision of BB's earlier stance on offshore, i.a. buying leaked documents

Tax evasion

- Tax evasion
- Hidden ownership (i.e. related buyers)

- Tax evasion
- Hidden ownership (i.e. related buyers)
- Listed companies; buyouts

- Tax evasion
- Hidden ownership (i.e. related buyers)
- Listed companies; buyouts
- Hidden control

- Tax evasion
- Hidden ownership (i.e. related buyers)
- Listed companies; buyouts
- Hidden control
- Misleading info re ownership

- Tax evasion
- Hidden ownership (i.e. related buyers)
- Listed companies; buyouts regulation
- Hidden control
- Misleading info re ownership
- "Centrifuge of debt & assets"

- Tax evasion
- Hidden ownership (i.e. related buyers)
- Listed companies; buyouts regulation
- Hidden control
- Misleading info re ownership
- "Centrifuge of debt & assets"
 Multiplying effect in a tiny economy

Better understanding now – all well?

Better understanding now – all well?

• "It's difficult to own money in Iceland..."

