

LUXPONT  
STRATEGY & CAPITAL

EXPANDING BORDERS.  
BUILDING THE FUTURE.  
SAFEGUARD YOUR LEGACY,  
ENSURE IT ENDURES.

LUXPONT STRATEGY & CAPITAL - CORPORATE DOSSIER

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# 01 / ABOUT LUXPONT

THE LEGACY THAT TRANSCENDS  
GENERATIONS IS STRUCTURED TODAY.

Luxpont Strategy & Capital is an international corporate architecture firm specializing in the European expansion of business groups, structuring of SPVs (Special Purpose Vehicles), estate structuring, and multijurisdictional tax planning.

We work with business groups and families expanding their assets into Continental Europe and the United Kingdom—establishing the structures that allow them to operate, invest, and grow with legal solidity and tax efficiency.

Each mandate covers the entire cycle: designing the optimal structure, establishing entities, and documenting economic substance, through to bank account opening. From the first contact until the capital operates in Europe.



# 02 / CORE VALUES

## 01. UNCOMPROMISING INTEGRITY.

We promise only what we can guarantee.

At Luxpont, there is no practice of promising results that the mandate cannot ensure. Each structure is designed with technical honesty, including its limits, risks, and the conditions under which it operates. Client trust is worth more than the mandate.

## 03. TECHNICAL PRECISION

Depth before speed.

A poorly designed and hastily executed structure is worse than no structure at all. Luxpont does not sacrifice technical rigor for the client's pace. Each corporate architecture is validated against:

- Current regulations.
- Applicable double taxation treaties.
- Banking requirements of each jurisdiction.

## 02. DISCRETION AS A PRINCIPLE.

The client should never worry.

Our clients' assets are, by definition, sensitive information. Discretion is not a procedure; it is an attitude that permeates every communication, document, and conversation. Our clients trust that what they share with us does not exist outside this space.

## 04. EJECUCIÓN COMPLETA

The mandate ends when the capital operates.

Luxpont does not deliver blueprints; it delivers operational structures. The mandate does not conclude with the notarial deed or registration. It concludes when the bank account is active and the first capital movement has been executed. No exceptions.

# 02 / CORE VALUES

## 05. DELIBERATE SELECTIVITY.

Few clients. Maximum depth.

Luxpont does not scale by volume. We work with a limited number of clients simultaneously to ensure each mandate receives top-tier attention. Selectivity is not a positioning strategy—it is a condition for sustainable quality.

## 06. ASSUMED RESPONSIBILITY.

A single point of contact. Total responsibility.

At Luxpont, there is no figure of an advisor who designs and delegates execution to third parties at the client's expense. We assume full technical and operational responsibility from start to finish. If something does not work, it is our problem, not the client's.

*“Visionaries who cross borders require solid structures—and advisors who take responsibility for building them.”*

# 03 / SPECIALTIES

## 01. INTERNATIONAL CORPORATE ARCHITECTURE

HOLDING DESIGN | OWNERSHIP MAPPING | TRANSFER PRICING

We design the complete map of the group: chain of ownership, dividend flow, position of each entity, and its function within the structure. The result is a corporate engineering blueprint, not a generic diagram, with integrated tax logic from the first stroke.

## 03. EUROPEAN INTERNATIONALIZATION.

BV-SOPARFI-SL | COMMERCIAL REGISTRY | TAX ID

We execute the complete establishment of entities in different jurisdictions, from:

- Drafting statutes.
- Registry inscription.
- Obtaining the Tax ID.
- Registration with the competent authorities in each jurisdiction.

## 02. ESTRUCTURACIÓN DE SPV.

PRIVATE MARKETS | BV-SOPARFI-SCA

We establish Special Purpose Vehicles in the Netherlands, Luxembourg, Spain, and France for:

- Co-investments in private equity.
- Acquisition of real or direct assets.

The SPV is the entity that separates risk, organizes the cap table, and allows capital to participate in the European private market with a solid international structure.

## 04. ESTATE STRUCTURING.

SUCCESSION | ASSET SEPARATION | FAMILY PLANNING.

We organize the entrepreneur's and their family's assets in an architecture that protects, separates, and plans generational transmission, including:

- Real estate.
- Corporate participations.
- Investment portfolios.
- Private use assets.

Each asset is placed in the correct entity and jurisdiction, ensuring tax efficiency and legal security.

# 03 / SPECIALTIES

## 05. MULTI-JURISDICTIONAL TAX PLANNING

PARTICIPATION EXEMPTION | DTT | DAC6-BEPS

We apply treaties to avoid double taxation, participation exemption regimes, and transfer pricing frameworks to minimize the group's legal tax burden. We also leverage the preferential tax benefits of each jurisdiction.

The analysis simultaneously covers Mexico, the Netherlands, Luxembourg, France, and Spain.

## 07. COMPLIANCE AND ECONOMIC SUBSTANCE.

ECONOMIC SUBSTANCE | BPS/PILLAR TWO | CRS-FATCA

We document and maintain the economic substance requirements demanded by BEPS frameworks and European anti-abuse regulations. A structure without documented substance is not only risky—it is indefensible.

## 06. EUROPEAN BANKING ACCESS

KBA | COMPLIANCE | KYC

We manage the opening of corporate accounts in European banks for newly established entities with foreign shareholders. This is the step that transforms a legal structure into a real operational group.

# 04 / GEOGRAPHIC COVERAGE

## MAIN FOCUS

With a special focus on Continental Europe—Netherlands, Luxembourg, Switzerland, Spain, and France—we design and execute corporate architectures that enable Latin American entrepreneurs to operate in Europe with:

- Solid structures.
- Tax efficiency.
- Real banking access.

## COMPLEMENTARY JURISDICTIONS

We also work in complementary jurisdictions such as the Dominican Republic, the United States, and the United Kingdom to develop:

- Diversified estate structures.
- SPVs.

## ORIGIN OF CAPITAL

We accompany groups based in Mexico, the United States, and the Dominican Republic in their transition to an international architecture that:

- Protects what has been built.
- Opens new opportunities.

*We oversee the mandate comprehensively, from the diagnostic phase to full operational consolidation, regardless of the number of jurisdictions involved in the structure.*



# 05 / REPRESENTATIVE MANDATES.

CORPORATE INTERNATIONALIZATION - TECHNOLOGY SECTOR

TECHNOLOGY GROUP OF 3 P.A.C.  
European expansion with a horizon to 2030.

Establishment of a B.V. in the Netherlands as HoldCo for a Mexican group of Authorized Certification Providers, for its expansion into Europe with centralization of IP, technological infrastructure, and service licenses with an EU passport. Operational subsidiaries in Spain and the United Kingdom as the first phase of commercial deployment.

Group treasury centralized in Luxembourg for intragroup financing, facilitation of LBOs, and management of private capital and debt instruments.



# 05 / REPRESENTATIVE MANDATES.

TAX PLANNING · ETVE REGIME

ETVE SPV · LATAM Dividends and Real Estate  
Investment in Spain

Spanish SPV under the ETVE regime for tax-exempt reception of dividends and capital gains from Latin American sources. Non-resident partners receive their distributions without Spanish withholding. Private capital is allocated to investment in Spanish real estate S.L.s, under participation exemption on qualified foreign-source income.



# 05 / REPRESENTATIVE MANDATES.

SPV STRUCTURING · INNOVATION BOX · GROWTH CAPITAL

KlinkApp · Dutch B.V. with sovereign European IP and access to institutional capital

Establishment of a Dutch B.V. as an SPV for co-investment, pooling Latin American capital in a European growth capital operation.

Structure with documented LPA, clean cap table for the target company, and BEPS-compliant economic substance from inception.

Bank account opening and onboarding.

<https://apps.apple.com/mx/app/klink-app/id6755255225>





# 06 / STRATEGIC LOCATION

MADRID IS NOT JUST AN ADVANTAGE.  
IT IS A DIRECTION.

Market | Language | Legal Culture

Operating from Madrid means direct access to the most relevant European market for Latin American entrepreneurs:

- Same language.
- Same legal culture.
- Regulatory passport for the 27 countries of the European Union.

For Luxpont, Madrid is not just a headquarters. It is the bridge between Latin American capital and the European architecture that protects it.

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# CONTACT

A FIRST CONVERSATION.

Every estate situation is different. Before proposing any structure, we need to understand yours. An initial conversation allows us to determine if Luxpont is what your group needs and if we can help you.

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