IoD Inspiring business

Business Planning for Brexit

Introduction

The Government's intention is for the UK to formally leave the EU on 29th March 2019. With 9 months to go, businesses should be mapping out their potential exposure points and addressing relevant scenarios, if they have not already done so. The EU and UK have provisionally agreed to a transition (implementation) period running until at least the end of 2020 that would see all current economic-related arrangements (from trade to immigration) continue unchanged – albeit with the UK formally stripped of its ability to participate in EU bodies and institutions. However, in light of the negotiating caveat that "nothing is agreed until everything is agreed", it would be prudent for IoD members to ensure they have assessed the possibility of a no-deal scenario and drawn up appropriate contingency plans if needed.

The likely expectation is that a withdrawal agreement will be reached – even if at the eleventh hour – and that negotiations on the detail of a future bespoke economic relationship will continue separately beyond March 2019 into the transition period. But it is important nonetheless for directors to understand for planning purposes what the UK being a "third country" in relation to the EU entails, even if the future economic partnership (FEP) secures more privileged terms than most third countries. The European Commission and its various agencies have helpfully issued guidance across a number of sectors for what would be required to carry on trading with or in the EU as a standard third country (i.e. without a new relationship in place), which is referred to throughout this guide.

While it is clear that many IoD members feel they can only sufficiently plan once the terms of the UK's departure and subsequent FEP with the EU are clear, there are steps businesses can be taking now to help understand the scenarios they should be planning for and how to prepare accordingly. There are of course many known unknowns, as well as unknown unknowns, given the unprecedented event that Brexit entails. But this guide aims to provide a minimum list of the areas companies should be checking over in mapping out their potential exposure and a set of steps they should consider taking to maximise their preparedness.

Table of contents

3 Milestones Timeline

4 Goods

9 Services

12 People

14 Brexit Checklist

15 IoD Resources

16 Glossary

17 Index of Useful links

Milestones Timeline

June 2018

EU summit (28th-29th) where "backstop" (i.e. no-deal insurance policy option) to ensure the avoidance of a hard border between the Irish Republic and Northern Ireland will be discussed by between the UK and EU. UK Government also publishing a detailed paper outlining its proposals for the future economic partnership (FEP) following the summit in early July.

October 2018

UK and EU aim to have the full withdrawal agreement text agreed at EU summit (17th-18th), including a political declaration outlining a general framework (will likely not contain significant level of technical detail) for the FEP. March draft of the withdrawal agreement text – absent the FEP framework declaration – can be found **here**[1]. This lays out how the economic arrangements would work if there is no FEP. An updated progress report on contents of the withdrawal agreement published on 19th June is also available **here**[2].

December 2018

EU summit and arguably the last possible chance for withdrawal agreement to be agreed between UK and EU without delaying the UK's formal departure date in March 2019. Withdrawal agreement still has to be ratified by European Parliament and the UK Parliament.

March 29, 2019

UK formally leaves the EU (UK legislation including the EU Withdrawal Bill, Trade & Customs Bills that are currently stalled in the UK Parliament must be passed) and the "implementation period" providing for transition continuity begins. Current Government position is that if the UK Parliament votes against the EU Withdrawal Bill containing the EU-UK Withdrawal Agreement, it will leave the EU at this point without a deal.

May-June 2019

European parliamentary elections and a new European Commission (which is officially responsible for negotiating the FEP) is appointed. Unclear at this stage whether the Article 50 Taskforce within the Commission (led by Michel Barnier) currently tasked with negotiating the Withdrawal Agreement is replaced by a new Commission body to oversee the FEP.

December 31, 2020

Currently-envisaged transition period formally ends and the new FEP takes effect. Current UK Prime Minister has suggested this may not be when new customs arrangements come into force depending on how quickly the FEP is agreed and infrastructure that may be needed to implement these can be ready. Most recent joint progress update on the withdrawal agreement[3] sets out – in the event of no FEP – exact cutoff dates for access to certain EU customs and VAT databases/procedures that in some cases would extend beyond the conclusion of this provision transition period.

[1] https://ec.europa.eu/commission/sites/beta-political/files/draft_agreement_coloured.pdf

[2] https://ec.europa.eu/commission/sites/beta-political/files/joint_statement.pdf

[3] https://ec.europa.eu/commission/sites/beta-political/files/joint_statement.pdf

Goods

In some respects, firms are more able to plan for Brexit when it comes to goods chiefly because there is more clarity and uniformity laid down on what trading goods with the EU as a third country looks like compared to services. The Single Market in goods is relatively complete and a known quantity, whereas for services it is more fragmented. Even now operating in one part of the Single Market compared to another can be unpredictable and variable, particularly in terms of how UK service suppliers are treated regarding domestic regulatory compliance. Conversely, procedures laid down for trade in goods are uniform across the Single Market and the EU's Customs Union.

Customs duties

The UK has signaled its intention to leave the EU's Customs Union, and to also seek a tariff-free quota-free trade agreement with the EU. In its most recent guidelines about the FEP, the EU Council (representing the EU Member States) has reciprocated with this base offering. The most recent guidelines can be found **here**[4].

This would mean that goods being traded between the UK and EU would not be subject to any new customs duties or tariff-rate quotas (which permit a maximum level of goods to be traded tariff-free before normal EU Most-Favoured Nation tariff rates[5] kick in) – including on agricultural products.

However, it is important for firms to understand for no-deal planning what potential tariff and related quotas they could face in exporting their products to the EU. As with most other countries, the EU has Most-Favoured Nation (MFN) tariff rates by product line set through the World Trade Organisation (WTO). These fall in two categories – bound and applied rates. The former sets a ceiling for what the EU can charge on imported goods, but the applied rate is the duty that is actually charged on an import on a day to day basis.

It is important generally to understand what commodity classification code the products that you sell fall into for trading purposes. Firms trading only with the EU will have never needed to have this information before. This is based on the international Harmonised System. HMRC has a how-to website **here**[6] that helps businesses begin this process. However, for the purposes of legal certainty, classification can be procured through a Binding Tariff Information (BTI) ruling. The European Commission provides information on this **here**[7], although they are issued by national customs authorities (HMRC). While there is some degree of uncertainty over whether currently-issued BTIs would be valid after Brexit, if you want maximum legal protection, it is generally advised that you should secure one in advance of the UK leaving the EU.

Once you have your relevant commodity code, consult the EU's TARIC database **here**[8] to determine what level of customs duty your product would face coming into the EU under a no-deal scenario. This also asks for the origin of the good – as the UK has not left the EU, the level of duty would be negligible.

Some countries have preferential trade arrangements with the EU that allow goods being exported to the EU to face reduced or zero-rated tariffs that diverge from the normal standard MFN rate. Assuming the UK would have no such tariff preferences under a no-deal scenario, you should select a country such as the US or China, where no preferential arrangements exist, to establish a comparable level of duty your product would face. However, you should also be aware that some goods originating from these countries may face special safeguard or anti-dumping duties, so it is also worth consulting the information about the EU's MFN tariff rates and related quotas on the WTO's website **here**[9]. This uses the general HS codes as the basis for assessment.

For the purposes of importing goods into the UK from the EU, the Government has not clarified under a no-deal scenario whether it would depart from the EU's applied MFN tariff rates, but the working assumption is they would for the immediate period match the EU's system given these are a known quantity.

Rules of origin

The Government has signaled its intention for the UK to leave the EU's Customs Union and not pursue a new customs union arrangement as part of the FEP. One of the biggest differentiators between a customs union and a pure free trade agreement is the application of preferential rules of origin on trade in goods between the contracting parties.

In order to avoid transshipment of goods, and to ensure that only goods originating in the contracting parties benefit from any preferential tariff rates, rules are set out under a free trade agreement establishing criteria for what constitutes as "originating". HMRC provides a

[4] http://www.consilium.europa.eu/media/33458/23-euco-art50-guidelines.pdf
[5] http://ukandeu.ac.uk/wp-content/uploads/2017/09/No-Deal-The-WTO-Option-Fact-sheet-1.pdf
[6] https://www.gov.uk/guidance/classification-of-goods
[7] https://ec.europa.eu/taxation_customs/business/calculation-customs-duties/what-is-common-customs-tariff/binding-tariff-information-bti-apply_en
[8] http://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=en
[9] https://www.wto.org/english/tratop_e/tariffs_e/tariff_data_e.htm

detailed explainer[10] on current third country (i.e. non-EU) imports for firms wishing to take advantage of existing EU tariff preferences extended to third countries.

For goods being exported to the EU which are not "wholly obtained" in the UK, and which have undergone processing in another third country as part of their production, understanding the supply chain of components going into the product is essential. Above a certain threshold, goods with components coming from non-UK countries will mean that product is not able to benefit from continued zero-tariff trade with the EU unless cumulation[11] arrangements are put in place between the EU and UK.

While preferential rules of origin can be an issue for agricultural products (e.g. spices, animal feed), they have particular widespread relevance for manufacturing and industrial goods – from the automotive industry to textiles and chemicals.

The cost and complexity involved in applying preferential rules of origin to UK-EU goods trade (where there are currently none) is why the IoD has proposed[12] a limited customs union for industrial goods as part of a wider preferential trade framework, as the burden can outweigh the benefit of duty-free sales to the EU. We are concerned that the time and cost burden involved – if compliance requires firms to not only trace but make significant changes to their inbound supply chains – will mean many businesses feel there is no alternative but to simply pay the EU's normal import tariff instead.

Chambers of commerce provide the documentation required – certificates of origin – to accompany goods being exported to certify the correct origin has been assessed. Intermediaries such as freight forwarders and customs agents can help with processing and checklists for this kind of paperwork. However, it is critical for companies actually selling or manufacturing goods for export to the EU to understand that all responsibility for ensuring the paperwork is correct and that the origin has been correctly assessed based on information provided by them **lies solely with themselves**. Should HMRC or other customs authorities query the paperwork either at the time of importation or thereafter (they can do so for up to three years after the certificate issuance) and find it to be incorrect, the importer would be liable for backpay of the correct and full MFN import duty rate. A general guide from the World Customs Organisation on rules of origin can be found **here**[13].

Under its trade agreements, the EU sets preferential rules of origin for goods being imported into the EU that are product-specific (rather than by general regimes or sectors as some other countries). While we cannot say for certain that the same criteria and thresholds for local originating content and/or cumulation rules under its existing agreements would apply with the UK, it is worth examining the EU's existing preferential trade arrangements with third countries for examples. A good starting point is the European Commission's Trade Helpdesk[14] on rules of origin.

There are also standard non-preferential rules of origin that apply to goods being imported into the EU under normal MFN tariff rates or for products that are under specific measures where anti-dumping or countervailing duties have been applied. More information on this can be found **here**[15].

Whether you import from or export to the EU, it is important to have a discussion with your customer or supplier to determine whether the relevant preferential rule of origin for your product (on the basis that there would be a free trade agreement and using existing EU agreements as a guide) is worth the added paperwork. It may be that – particularly from an exporter's point of view – it is easier and more predictable for all to have the importer pay the import duty rate, depending on the level of the normal MFN tariff for the product(s) in question. However, making such a judgment may need to wait until there is more clarity about the future economic partnership between the UK and EU.

VAT

Currently, goods being traded between the UK and EU are not subject to import VAT as the UK is part of the EU's VAT area. For VAT purposes, 'exports' to the EU are treated as 'despatches' and 'imports' from EU countries as 'acquisitions'. VAT-registered businesses can account for VAT on goods being bought from another EU country on their next VAT return.

However, as a third country outside the EU's VAT area (which includes countries in the Single Market like Norway), bringing in goods from the EU means this becomes import VAT, which must be paid before the good crosses the border. This would generally be set at 20%, and goods being exported to the EU would also face VAT from destination EU countries. Distance-selling thresholds, which allow private online and mail-order retailers to sell goods to EU consumers using their UK VAT numbers up to

[10] https://www.gov.uk/guidance/rules-of-origin
[11] http://www.wcoomd.org/en/topics/origin/instrument-and-tools/comparative-study-on-preferential-rules-of-origin/specific-topics/study-topics/cum.aspx
[12] https://www.iod.com/customisingbrexit
[13] http://www.wcoomd.org/-/media/wco/public/global/pdf/topics/origin/instruments-and-tools/guidelines/guidelines-on-certification-endorsed-july-2014-en.pdf?db=web
[14] http://trade.ec.europa.eu/tradehelp/list-arrangements-and-rules-origin
[15] https://ec.europa.eu/taxation_customs/business/calculation-customs-duties/rules-origin/nonpreferential-origin/introduction_en

a certain distance threshold, would no longer be applicable. Those companies would therefore need to register for VAT in each EU country where the goods are supplied to – or stop trading with customers there.

It would also mean businesses trading with the EU lose access to existing VAT-related simplifications such as triangulation and "supply and install".

This naturally has implications for business cash flow that will need to be examined. The Government could unilaterally mitigate this for EU imports under a duty deferment scheme by introducing postponed accounting, but there is no guarantee that other EU customs authorities would reciprocate for import of UK goods. Businesses may then need to appoint a fiscal representative in EU countries that they are trading with.

For those companies which bring goods in to the UK for re-export to the EU ("temporary storage") however, there are also existing special procedures which could be applied that will suspend VAT and customs duty payment such as inward processing and customs warehousing. These combined measures can help with cash flow management.

The Government has not yet confirmed whether it is proceeding on the basis of the UK being a third country for VAT purposes or whether it wishes to ask for a special arrangement that would allow it to remain part of the EU's VAT area (but remove the scope for new flexibility on setting VAT rates). Survey research indicates that more IoD members would prefer the first of these two options.

Currently, exports to the EU from third countries benefit from optional low value consignment relief on VAT for parcels ranging in value between 15 and 22 euros, with flexibility for Member States to set the exact figure (the UK's is 15 pounds). While UK exports to the EU (small low-value parcels) could theoretically avail themselves of this relief if and when the UK becomes a third country for VAT purposes after Brexit, the European Commission in 2015 proposed ending this exemption – although it will likely take several years for this to be agreed and implemented.

Product Regulation/Compliance

Assuming that the UK is outside the Single Market (technically known as the EU's Internal Market) unlike countries such as Norway – and in the absence of knowing what bespoke arrangements on regulatory alignment it may strike with the EU – regulatory compliance will become a significant new variable in UK-EU goods trade. Unlike with tariffs, there are no internationally-set baselines for how rules on product regulation should be followed.

The EU sets its own guidelines for how imports from third countries outside the Single Market should be treated at the border. These fall broadly into two categories – technical regulations and sanitary & phytosanitary (SPS) related rules. The first are more relevant to manufactured goods such as pharmaceuticals, automotives and chemicals. Below are two industry examples.

Conformity Assessment

A manufacturer can only place a good on the EU market if it demonstrates it has met all the relevant requirements related to performance, safety and environmental parameters. Currently, declarations of conformity assessment when selling to the EU are not needed given the assurance our Single Market membership provides that the UK is automatically following all EU product rules and regulations. There is a 'presumption of conformity' that negates the need for product documentation relating to conformity or related inspection checks at EU/EEA borders.

Certifications issued by UK Notified Bodies (such as the Vehicle Certification Agency) would no longer be valid and recognised as equivalent by the EU and would require re-certification upon entering the EU. There are different scenarios relating to conformity assessment that would entail varying levels of cost and new administrative procedures for industry that the British Standards Institution has outlined here[16].

[16]https://www.bsigroup.com/LocalFiles/en-GB/Brexit/Brexit-product-conformity.pdf

Marketing Authorisation

For the life sciences sector(s), placing goods onto the EU market also critically depends on securing marketing authorisation from the appropriate agencies. Currently, pharmaceutical products and medical devices can receive these either through the UK's MHRA agency or directly from the European Medicines Agency – which will be relocating from London to Amsterdam after Brexit. In the absence of a deal which sees complete continued regulatory harmonisation with EU rules and UK participation in the EMA, existing marketing authorisation holders (MAH) will need to transfer the authorisation to an MAH located in an EEA country (EU and Norway, Iceland and Liechtenstein). Pharmaceutical companies can take advantage of a slew of information published by the EMA over the past 12 months, although it is important to note that there is little mention of the likelihood of a transitional period from March 2019 which would at the very least delay the practical application of third-country status and rules to the UK until the end of 2020. The most recent guidance can be found here[17].

The chemical industry in the UK is currently governed by – among other pieces of legislation – the Registration, Evaluation, Authorisation & Restriction of Chemicals regulation (REACH), in addition to being overseen by ECHA – the EU's chemicals regulator. While the UK's Health & Safety Executive carries out some functions in relation to oversight of the rules governing the industry, ECHA is chiefly responsible for UK chemicals regulation.

The Government has yet to clarify whether it intends to create a new UK REACH and related database (which is in itself a Single Market mechanism), although it has signaled its desire to remain within ECHA. Without access to REACH, a duplicated system would likely need to be set up, and companies trading with the EU will require a physical footprint in an EEA country to maintain their ability to sell within the EU market. ECHA has also issued guidance[18] on a worst-case scenario planning basis.

Finally, companies in the agri-food sector(s) should familiarise themselves with what SPS controls are in place for trade between the EU and third countries. There are none in place for those in the Single Market like Norway and Switzerland, given – albeit through different agreements – they follow EU rules relating to plant & animal health, food safety and veterinary standards. While the UK is hoping to reach a similar outcome, if it insists on the right to diverge from EU rules in these areas (even without actively diverging to begin with), checks and controls will be needed at UK-EU borders.

Businesses in these industries looking at contingency planning should become acquainted with how Border Inspection Posts (BIPs) operate, as any Products of Animal Origin (POAO) would need to enter through these coming into the UK or EU. BIPs are managed by Port Health Authorities, and consignments clearing them are required to present relevant veterinary certificates and other paperwork inspection. This is separate to customs-related clearance, which proceeds after. Given the sensitivity of the products in question, delays can often result from these checks, and building a longer time-frame into supply chain management will be essential.

Retaining access to the EU database alert systems such as TRACES and RASFF to allow national authorities to share information on any potential risks through the food supply chain would mitigate against serious additional disruptions to trade flows at the border after Brexit. Regardless however, companies should be looking at how to update and better automate their trade management IT systems with information on processes for trade with the EU as a third country beyond Norway and Switzerland. This includes – but is not limited to – information on EU import license requirements (outside of the Common Agricultural Policy these are done differently), export health certificates, and documentation proof of compliance with EU food labeling rules.

While for some businesses – such as those in Northern Ireland – planning may be easier in respect of opening up a subsidiary or sister operation in the EU, it is also important to exercise caution in making too many active costly changes prematurely. Investing time into exploring shadow supply chains may be a good alternative to pre-emptively replacing suppliers now. It is also prudent to take this time – particularly afforded the likely transition period – to map out as far as possible where your business sits in a current supply and/or value chain. UK-based retailers should consider sourcing from cheaper non-EU countries as well as leveraging the weaker exchange rate as part of their marketing strategies to new markets overseas.

[17] http://www.ema.europa.eu/docs/en_GB/document_library/Regulatory_and_procedural_guideline/2017/11/WC500239369.pdf
[18] https://echa.europa.eu/advice-to-companies-q-as/general

Customs/transit procedures

The UK government is currently considering two options to ease the flow of goods between the UK and EU after Brexit in the absence of a customs union arrangement. The first, relying on "maximum facilitation" or "max fac", is principally aimed at unilateral domestic measures combined with a system of mutual recognition of these measures with EU equivalents. Many of these will likely require wider familiarisation and take-up from business regardless of the outcome of negotiations. They include:

- Greater use of self-assessment procedures for customs compliance on imports (similar to VAT)
- Inward and outward processing reliefs
- Trusted trader schemes such as Authorised Economic Operator (currently used more by larger companies although the application criteria may be relaxed by HMRC) and Approved Exporter to reduce the scope for consignments to be pulled aside for checks going through customs
- Inland clearance [facilities] for customs rather than at ports or at the land border
- Customs warehousing
- Better use of technology to digitise supply chains and automate companies' trade management systems – this will require investment in expert advice and new tech systems but will make a big impact on managing Brexit exposure
- Encouraging and potentially subsidising companies (as the Irish Government has done with their Brexit planning voucher scheme) to create supply chain management strategies
- Acceding to the Common Transit Convention (CTC, as proposed by the IoD in early 2017) to facilitate the goods transit across the EU – and other country signatories – by temporarily suspending duties and other charges on goods imports until they reach their final destination

There will be a number of other forms and documentation, in the absence of any customs union arrangement with the EU, that may become critical to the movement of goods which are currently applied by the UK and/or the EU for third country trade – particularly in the event of a no-deal outcome. While freight forwarders can assume a large share of the responsibility for physically managing these, it is useful for firms to familiarise themselves with what they relate to (and how goods may be held up in EU customs after Brexit). These include:

- Customs declarations
- Invoice
- Certificate of Origin
- TIR Carnet
- Single Administrative Document
- Transit Accompanying Document (TAD or T1) if UK accedes to the CTC
- EORI number – any exporter will already have this but those currently trading only with the EU will need to apply for one to HMRC

The Government is also mulling the creation of an unprecedented option that would supposedly negate the need for customs declarations and customs controls between the UK and EU by operating two import tariff regimes at the border – the EU's and its own. Referred to as the "new customs partnership", it would require differentiation between third country imports which remain in the UK and those which go to the EU. In effect, the UK would be managing and collecting EU duties on its behalf at the border. The NCP would need to rely on a tracking mechanism (and companies being able) to differentiate between imports staying in the UK and going to the EU, as well as a rebate system for those not re-exporting to the EU but paying the higher tariff.

There has been some testing of the NCP with a select group of companies, but it requires much wider consultation and will take longer than the currently-envisaged period for transition to implement. IoD members have been clear by a large margin however that they would prefer an option which removes the need for customs processes and checks between the UK and the EU than simply relying on the "max fac" option which assumes a new starting level of trade friction. The Government's paper on customs arrangements can be found **here**[19].

[19] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/637748/Future_customs_arrangements_-_a_future_partnership_paper.pdf

Services

While the Single Market in services is underpinned by some key consistent and enforceable legal principles such as non-discriminatory treatment and the ability to tender for public service contracts in every participant country, it is far from complete in a number of sectors. This makes comprehensive certainty on what to plan for on Brexit more challenging. It may also, however, mitigate the impact of the UK's departure from the Single Market in some service sectors relative to goods because of the national barriers to intra-EU movement of services which already exist.

There are harmonised rules relating to financial services, broadcasting, public procurement, some aspects of company law (such as capital requirements, shareholders rights, audit/accounting and M&As) data flows/privacy and transport. Notably, although potentially of less immediate concern for Brexit business planning, there is also considerable harmonisation of competition law and policy. However, the EU's push to develop the full free movement of services within the Single Market has been primarily aimed at breaking down existing national discriminatory measures to trade. In contrast, there has been far more centrally-driven harmonisation of rules at the Single Market level for goods.

Financial and related professional services

For some financial services firms, contingency planning will already be in its advanced stages – if not already in active deployment. The Bank of England set a requirement for the UK's biggest companies engaged in cross-border activities to submit details of their plans to the Prudential Regulatory Authority (PRA) by last July. The Financial Conduct Authority (FCA) also made a similar request of the UK's largest asset managers.

A number of companies in the finance sector are and should be looking at licensing requirements in other EEA countries, in light of the likelihood that UK access to "passporting" disappears outside the Single Market. The timescales needed to complete this process, depending on the country, can run from 12-24 months. Many national authorities across the EU are also making clear that firms should expect to put forward plans for a substantial material presence in order to obtain a license, rather than simply transferring some back office staff. The criteria demands are often – though not always – commensurate with the level of pre-existing financial service activity in the country.

In some specific areas, some of the need to relocate or expand operations to an EEA location may also be driven by future EU regulatory developments – particularly once the UK has left the EU. A notable example is in euro-denominated wholesale banking (clearing, FX and derivatives trade), where the Commission has already unveiled proposals which could incentivise the shift of these activities to be located inside the Eurozone.

Subsidiaries of European parent companies should be looking at how they will respond to an outcome that requires physical branch location inside the EEA to continue trading, while ascertaining how compliance with new rules such as MiFID II might evolve once the UK is outside the EU. Looking at pricing strategies, communicating response plans to all corners of the business (clients, shareholders, key staff etc.) is important. Looking at the potential impact on capital requirements (which could be either negative or positive depending on the negotiation outcome) and how loss of market access could affect the ability to raise capital from EU investors are also critical.

Reviewing contracts is also a particularly important dimension for financial and related professional services firms because of the relatively high number of cross-border contracts which rely on passporting rights and other EU-regulated activities – which in turn have at their heart clear and detailed legal underpinnings relating to the Single Market. The termination of these rights, as many expect, would make fulfilling certain contracts agreed pre-Brexit day (i.e. loan servicing) after the UK's formal departure date unlawful. While not applicable in every situation, some contracts with banks may need to be restructured, transferred or terminated.

Reviewing contract portfolios and engaging with national supervisors where your firm has operations or clients should be prerequisites if firms don't wish to bank on the transition period allowing these to continue being carried out. For worst case scenario planning, the European Commission has issued a range of stakeholder notices for companies across the sector that are available **here**[20].

The UK and other EU member states may independently agree to grandfather existing contracts under their national licensing regime on a case by case basis. The Bank of England and the FCA have sought to provide their own assurances in stating that any firm using passporting rights to operate in the UK can continue to

[20] https://ec.europa.eu/info/publications/180208-notices-stakeholders-withdrawal-uk-banking-and-finance_en

rely on existing authorisations until at least the end of 2020. The UK Government has also committed to legislate if necessary to give UK regulators the power to grant EEA firms and funds passporting into the UK a temporary permission to continue doing so. This would allow those relevant contracts with UK customers to continue operating as well as allow those firms to enter into new contracts for a period of time after exit day, while applications for full new authorisations were being made.

Contracts for other service providers

Reviewing contracts generally should be an absolute essential for any and all companies with operations or activities which extend to other parts of the EU/EEA. Any part of a contract that rests – explicitly or implicitly – on the free movement of services/freedom of establishment (as provided for under Single Market rules) needs close examination.

If disruption relating to Brexit could be significant, inserting a "force majeure" or "material adverse change" that would allow for either the renegotiation of terms or – in extreme circumstances – terminating of an existing contract with suppliers/providers and other clients or customers may be advisable. Making clear who would be responsible for any new costs arising from customs formalities, changes to VAT or other new obligations is also worth considering.

Clarifying the meaning of "territory" relating to licensing or distribution in contracts may also be desirable where there is an explicit reference to the EU or EEA, given the UK will likely no longer be a member of either – legally speaking – after exit day in March (even if trade terms stay the same).

While some supply of services may rely on EU rules and regulations to operate, there may be other legal bases which can be relied on to continue trading. For example, with some aspects of broadcasting, there is also the Council of Europe Convention on Transfrontier Television that is worth examining. On a wider point, companies should be looking at all the relevant sets of rules that apply to their sector: bilateral between countries, EU/EEA, WTO, plurilateral and sectoral bodies at the international/intergovernmental level which govern standards as well as issuing intellectual property protection.

EU VAT rules also apply to cross-border service provision as well, notably in the digital trade sphere. There are a number of reliefs which apply to VAT on the supply of electronic services within the EU that would no longer be available as currently constructed to UK eBusinesses if the Government does not seek an arrangement to stay tied to the EU's VAT areas.

These include the VATMOSS system that removes the need for firms to register to pay and declare VAT in each EU country where their customers are based when selling digital services (i.e. e-courses, gaming services). In order to continue availing themselves of VATMOSS, UK sellers would have to register for VAT in one of the remaining EU27 countries. For those firms making use of VATMOSS, identifying which EU countries account for the most customer revenue and setting this against the cost of registering for VAT in those countries would be an ideal place to start planning. Unlike with import VAT, there is no current equivalent for deferred payment/postponed accounting when it comes to taxing digital services trade.

Public procurement

The principles of transparency, equal treatment and non-discrimination are important pillars when it comes to EU law on tendering for public sector contracts. All tender calls across the Single Market (including Norway, Iceland and Liechtenstein) must be published in the EU's Official Journal. The continued requirement for selection criteria to be evenly applied to UK firms bidding for tenders across the Single Market and vice versa will naturally depend on the future relationship negotiations between the UK and EU. However, both sides have expressed a willingness to see this level playing field maintained, although the devil will be in the detail – particularly as regards enforcement and flexibility to adopt and amend EU procurement rules in future.

The enforcement and future dispute resolution dimension to future UK-EU arrangements will be important for firms to consider here, particularly if they wish to bring a claim of discrimination in relation to the tender process after exit day. While the expectation is that the EU Court of Justice's jurisdiction will continue to apply during the transition period – and that the UK will still be bound by Commission-drafted Single Market rules and infringement proceedings – further clarity is needed on what direct redress UK firms will have to make representations relating to discriminatory treatment.

This uncertainty extends to both new tenders and existing public sector contracts being fulfilled by UK companies across the EU, and firms should consider the potential for any delays to major projects as a result of

any arising legal uncertainty. Businesses should also examine or clarify what scope there is for variations permitted under their current public sector contracts if there are significant changes arising out of Brexit – from currency fluctuations, to company base jurisdictions.

There tends to be less room for manoeuvre in restructuring or renegotiating contractual terms in public procurement procedures, and clarifying this with relevant public sector bodies/authorities across the Single Market should happen now. The IoD is currently liaising with the Government and European Commission to secure public clarity on this from the latter. Future restrictions on free movement of persons may also constrain firms' ability to win or fulfill public sector contracts in other EU/EEA countries.

Data flows

One of the most important aspects of the negotiation between the UK and EU centres around the continued free flow of personal data between both sides. Arrangements to continue facilitating this are crucial not only for the future economic partnership but also for a new security relationship once the UK is outside the EU. The vast majority (estimated at 75%) of the UK's data flows are with EU countries, underpinning the transmission of everything from payroll and patient data to financial information between bank branches and the deployment of capital.

In order to allow these transfers to continue seamlessly, as a third country outside the Single Market, the UK will have to demonstrate to the EU that its protection of the treatment of EU citizens' data is adequate to be deemed as equivalent to the EU's regime. This should be significantly aided by the fact that the UK is currently complying in full with the EU's new General Data Protection Regulation (GDPR), however the decision is an intensely political and often protracted one. The onward transfer of personal data to other countries which are not deemed equivalent may complicate the process.

It is important for businesses to be in full compliance with GDPR as part of the push for the UK to receive an adequacy decision from the EU. Beyond this, firms may wish to look into setting up data processing centers in an EEA country if they want to be more than certain of retaining their ability to handle personal data from the EU (or as a more drastic measure blocking all European users from their company servers). Alternatively, companies may wish to explore binding corporate rules with a relevant European Data Protection Authority or setting up model contract clauses to secure beyond doubt that they are authorised to continue handling personal data from the EU. These options – while providing legally watertight ways of ensuring continuity without waiting for or relying on the EU to grant the UK adequacy – are very lengthy, time-consuming and costly alternatives that may well prove unnecessary. Most of the companies from third countries that have relied on them to handle EU citizens' personal data are large multinationals.

Intellectual Property

Covering both goods and services, the effect of Brexit on intellectual property spans a range of areas for consideration. These include EU Trade Marks (EUTMs), Geographical Indications, Registered Community Designs, Plant Variety Rights (PVRs) and Supplementary Protection Certificates. While many aspects of intellectual property rights (IPR) derive and benefit from EU legislation and related enforcement provisions, there are a number which do not. Distinguishing between these is important to ascertain what businesses need to be looking at for continuity purposes.

Any patents granted under the European Patent Office (EPO) will not be affected by the UK's exit from the EU, as the EPO is not an EU-based entity – nor will applications made under the Patent Cooperation Treaty. UK patents granted by the UK Intellectual Property Office (UK IPO) will also not be impacted by Brexit. It is also worth noting that the UK's participation in the new Unified Patents Court (UPC) and implementation of the Unitary Patent is not expected to be affected by leaving the EU – the Government has recently ratified the UPC agreement.

The validity of various intellectual property rights granted and enforced under EU legislation in the UK and across the EU depends firstly on the final withdrawal agreement and subsequently on what is negotiated under the Future Economic Partnership (FEP). A substantial part of this has been agreed under the current draft of the withdrawal agreement –including on provisions during the transition period. The European Commission has appeared to go with the so-called "Montenegro"

Intellectual Property

model of automatic protection – as pushed for by the IP industry. Exceptions to this fall under the EUTM and PVRs with respect to pending applications, which would necessitate a more opt-in type approach.

While the withdrawal agreement will provide a base level of provision to allow for continuity, the future of both the domestic IP landscape and agreements on IPR between the UK and EU after the transition ends relies on what dispute settlement provisions are agreed, and on the detail of the FEP. This article[21] provides an itemised list of what has been agreed so far on EU-relevant IP rights in the withdrawal agreement and what remains to be agreed, as does this shorter legal briefing[22]. It is worth noting that in the recent progress update from both sides, clarification has been given that requests for supplementary protection certificates filed in the UK during the transition can still be approved under the provisions of the relevant EU regulation if the procedure is still underway once this period ends.

People

The rights of EU nationals currently resident in the UK, UK nationals working in the EU, and future access to EU workers regularly top the negotiation priority list for IoD members. These issues are not just important in isolation, but also integral to trade continuity in both goods and services with the EU. The success of companies with pan-European operations (as well as those expanding across the EU) and commercial contracts often hinges on the ability of workers to move around Europe freely. The Prime Minister has made clear that free movement as currently constituted will come to an end after the Brexit transition period, while stating that the Government wants EU nationals already here to be able to remain in the UK after Brexit. While the Home Office has made progress on ensuring the latter, there is little detail from the Government as yet on what system for UK-EU mobility it wants to see for replacing free movement in future.

EU nationals in the UK and "settled status"

As evidenced in Part Two of the draft Withdrawal Agreement text[23], the UK and EU have made significant headway on a deal to guarantee rights for EU/EEA nationals currently living and working in the UK, as well as vice versa. A few important issues remain outstanding, such as the onward movement rights for UK citizens living in the EU and the launch date for the "settled status" category being set up by the Government which will replace the current system of permanent residence for EU nationals in the UK. The final details and the registration process for EU nationals wishing to remain in the UK after Brexit are due to be made public this autumn. Irish citizens will not have to apply for settled status as their right to reside in the UK is unaffected by Brexit and is covered by the Ireland-UK Common Travel Area agreements and the 1949 Ireland Act.

In the meantime, businesses should familiarise themselves with Home Office guidance that is being continually updated on its website on applying for settled status, as well as encouraging their workforce to read through the information. Anyone who is an EU citizen – and in the UK lawfully – will be able to apply for settled status, regardless of whether they currently have permanent residence. This also extends to their close EU national family members (spouses, civil and unmarried partners, dependent children and grandchildren, and dependent parents and grandparents). Those with permanent residence documentation already must have it converted into a settled status document free of charge.

People who by the end of 31 December 2020 (the end date of the expected Brexit transition period) have been continuously living in the UK for 5 years will be able to apply for and receive settled status. They will be able to live and work freely, have the same access to UK social security and public services entitlements that UK nationals have, and apply for UK citizenship. For those who will have been here less than 5 years continuously, an application can be made for temporary permission to stay until they have reached the 5 year threshold. After that point, they can apply for the permanent settled status category.

The application fee will £65 for people 16 years or over, £32.50 for under 16s, which is less more than the price of a UK passport charged to UK citizens (currently £75.50 per person). Supporting documents must include:

- proof of identity (e.g. a passport or ID card) and a recent photograph

[21] https://academic.oup.com/jiplp/advance-article/doi/10.1093/jiplp/jpy075/5033029
[22] https://www.slaughterandmay.com/media/2536734/brexit-essentials-ip-rights-post-brexit.pdf
[23] https://ec.europa.eu/commission/sites/beta-political/files/draft_agreement_coloured.pdf

- a declaration of any criminal convictions

You won't need to do the following:

- account for every trip you've taken out of the UK
- show evidence that you held comprehensive sickness insurance (as was previously required for a permanent residence document)
- provide any fingerprints or biometric data

The Home Office has said the application system – online and in paper form as well through a Smartphone app (not all parts of the application can be completed on Apple iPhones though they can on other smartphones) – will be up and running in autumn 2018. EU nationals who qualify (by arriving in the UK before 31 December 2020) will still be able to apply until 1 July 2021. The Government says it is still negotiating to secure parallel rights for non-EU EEA and Swiss nationals (who also currently benefit from free movement rights). EU citizens and their close family members arriving during the transition period between 29 March 2019 and 31 December 2020 will still be entitled to free movement rights and able to apply for temporary – and subsequently settled – status. However, they will need to register if staying for longer than 3 months. Home Office guidance on the application process and rules for settled status are available **here**[24]**.**

We would encourage IoD members and businesses generally to proactively engage with their employees on this guidance rather than waiting for them to address it on their own. Good staff communication will help everyone in the workplace feel ready for this part of Brexit. However, employers should be mindful of their legal limitations in this regard. You are not permitted under law to assist applicants in the actual application process or do the application for them. You should also be mindful that doing so may expose you to liabilities should that person's application prove unsuccessful.

Nevertheless, as part of the communications process, an internal audit to identify who is an EU, EEA and/or Swiss national will help assess who needs to take what steps to secure continuity. It is important to be mindful that some members of staff who appear to be non-EU nationals may, in fact, be resident in the UK by virtue of an EU passport (for example US born staff who have dual Irish and American citizenship).

Other steps that firms can take in terms assessing and limiting the impact of Brexit on their workforce and access to talent include:

- Consider drawing up a communications plan to employees (as well as to other parts of the business such as shareholders, management and suppliers) to discuss updates to Home Office guidance and the application procedures
- Where possible, look ahead to staffing requirements over the next 2-4 years
- Quantify the cost of having to retrain new staff to replace or fill identified potential staffing gaps
- Consider drawing up an in-house Brexit team or assign these responsibilities to someone within HR (if applicable)
- Monitor and feed into Government consultations on future immigration policy (an Immigration White Paper is expected sometime this year and the Migration Advisory Committee will be issuing a final report on the impact of ending free movement in the autumn)

[24] https://www.gov.uk/guidance/status-of-eu-nationals-in-the-uk-what-you-need-to-know

Brexit Checklist

We hope you have found the information so far useful, and while there is never enough time and space to go through every detail, a checklist of questions is provided below as a final reminder of what your business should be contemplating as the UK's EU exit draws near:

1) Have we mapped out all of our potential pinch-points of exposure to Brexit – from financing and tax liabilities to regulatory compliance requirements and an EU employee audit?

2) Have we discussed the company's Brexit plan and risk assessment with the board and shareholders?

3) How long would we need to make adjustments to cross-border operations and activities under a new economic arrangement between the UK and EU?

4) Do we know what a no-deal scenario or falling back on WTO rules would mean for the business?

5) What are the cash flow implications of continued volatility in the exchange rate and have we made any plans to mitigate this – through hedging/forward contracts or setting aside enough cash/capital reserves?

6) Have we conducted a review of our supply chain – upstream and downstream – to assess the potential for indirect impacts of Brexit changes and looked at alternative suppliers?

7) Can my business absorb the range of potential cost increases, and/or can we pass any of these on to my customers?

8) What discussions have we had with existing customers, clients and suppliers to discuss different Brexit scenarios and whether contracts should be reviewed now or in the future?

9) Does my business or that of any of my clients benefit from EU funding – directly or indirectly?

10) Has anyone in the company been assigned responsibility for Brexit maintenance/planning, and if not should someone be tasked with this?

11) Have we looked at intermediaries such as freight forwarders and customs brokers to help relieve some of the burden of new transport and customs challenges?

12) Is there a need to look at regulatory/licensing requirements in other EU countries and assess what the most cost-effective place to open up a subsidiary/local branch would be?

13) Have we clarified delivery terms with my customers?

14) Have we quantified the cost of goods sitting in EU or UK customs for each extra hour or day?

15) If we are looking to raise finance as part of a medium-term strategy, have we factored Brexit into this?

16) Should we review or revise forecasts and cash flow predictions?

17) Are we using the weaker pound as part of our exports sales marketing strategy?

18) Can we look into existing EU free trade agreements or those currently being negotiated to see if there are preferences for new or existing markets we could make use of to cut entry costs? (By the same token, can we review what agreements or trade preferences my business may be already using in case these are not successfully rolled over after Brexit).

19) Have we considered how any intellectual property will continue to be protected in the EU after Brexit? Does the business have any EC trademarks that will need to be converted into UK ones?

20) Do we supply any services or have any training/expertise that we could capitalise on to help other companies with their Brexit planning?

IoD Resources

As a cross-sector business membership organization, the IoD strives to ensure that we represent and project the interests of directors from a wide variety of industries to the Government in relation to Brexit planning. We sit on numerous business councils and advisory groups chaired by the Prime Minister and other Ministers that meet regularly to discuss business' priorities for the negotiations, as well as sitting on planning committees in relation to customs, regulation and immigration policy. In addition, we have a series of resources that IoD members can make use of in mapping out their Brexit preparation:

- Information Advisory Service (IAS)
- Navigating Brexit event series – draws together experts to discuss negotiation updates and planning strategies for business. Summaries and footage on the IoD's website
- Bi-monthly Brexit surgery webinar hosted by the IoD's Head of Europe and Trade Policy Allie Renison
- Legal Helpline
- Tax Helpline
- Monthly Policy Voice survey – where the IoD collects data on member views relating to Brexit to present to Government for the negotiations
- IoD Regional branch Brexit events and roundtables
- Navigating Brexit hub on the IoD website – reports and policy content, Brexit blogs, factsheets and more!

Below is a selection of factsheets currently available via the IoD's Information Advisory Service:

- What will happen to EU Nationals living and working in the UK as a result of Brexit
- The potential VAT consequences of Brexit
- The impact of Brexit on your business
- Brexit – Prepare your business and plan for the future
- Brexit – Considerations for employers
- Brexit – ten things directors should consider next
- Brexit – the implications for cyber security and data protection

Glossary

Future economic partnership (FEP): The term used by the UK Government to describe the long-term post-Brexit trading relationship between the UK and the EU.

Political declaration: A statement that will contain the framework for future UK-EU relations, accompanying and referred to in the Withdrawal Agreement. The political declaration is not legally binding but it is expected to serve the basis for negotiations on the future relationship.

EU Withdrawal Bill: The piece of legislation designed to repeal the European Communities Act of 1972, which brought the UK into the European Economic Community (now the European Union).

Single Market: The EU's common market territory which removes regulatory barriers, allowing for the free movement of goods, capital, services and labour.

EU's Customs Union: The EU's common trade area whereby all participating states are subject to the Common Commercial Policy. Countries share the EU's Common External Tariff and goods moving between states can move without additional customs checks.

Most-favoured nation (MFN): A non-discriminatory clause based on the idea that all countries should treat one another equally in international trade.

Binding Tariff Information (BTI): A ruling determined by the EU which provides legal certainty for the tariff classification of goods.

TARif Intégré Communautaire (TARIC): A multilingual database administered by the EU which explains the measures relating to the EU customs tariff. A 10-digit TARIC code must be used in customs and statistical declarations when trading with third countries.

Marketing authorisation (MA): An authorised status provided to pharmaceutical companies, provided by the European Medicines Agency upon successful application. The marketing authorisation holder (MAH) can market medicine and make these available to customers throughout the EU.

Authorised Economic Operator (AEO): An internationally-recognised quality assurance status and a trusted trader scheme which indicates a company's supply chain is secure and its customs procedures are compliant.

Certificate of Origin: A declaration which proves goods are wholly obtained, manufactured or processed in a particular country. It can be obtained from a chamber of commerce for a fee.

Transports Internationaux Routiers (TIR) Carnet: An internationally-recognised permit which simplifies administrative procedures for road transport operators. The EU's Single Market means the TIR system has become obsolete among Member States.

Single Administrative Document (SAD): The main customs form used by businesses for trade to and from the EU. Traders must fill out the details of the form, including: what the goods are, where the goods are going, the commodity code of the goods and the Customs Procedure Code, which determines how customs authorities treat the goods upon import. The document is not necessary for intra-EU goods movements.

Transit Accompanying Document (TAD or T1): A transit document which allows for goods originating outside of the EU to move freely within the EU. No customs duties or taxes are payable as the shipment moves from one country to the next within the European Union.

Economic Operator Registration and Identification (EORI) number: A number assigned by HMRC to importers and exporters used in the process of customs entry declarations and customs clearance for shipments travelling to and from the EU as well as countries outside of the EU.

Passporting: An EU regulation that allows a business within the European Economic Area to carry out activities in another EEA state without needing further authorization.

MiFID (Markets in Financial Instruments Directive) II: An EU regulation designed to increase competition, consumer protection and transparency into the trading of all asset classes. It came into effect in January 2018.

Council of Europe Convention on Transfrontier Television: An EU treaty allowing for the free circulation of transfrontier television programmes.

VAT Mini One Stop Stop (MOSS): An EU-administered way of paying VAT in those cases where a business supplies digital services to other EU countries.

Common Travel Area (CTA): A special travel zone established in 1923 comprising the UK and Northern Ireland, Ireland, the Isle of Man and the Channel Islands. Both the UK and EU have committed publically to the preservation of the area.

Index of useful links

Official Government papers and Brexit negotiation documents:

Latest version of the Draft Withdrawal Agreement highlighting the progress made in the negotiations as at 19 March 2018: https://ec.europa.eu/commission/sites/beta-political/files/draft_agreement_coloured.pdf

Guidelines adopted by the European Council on 23 March 2018 for negotiations on the future relationship: http://www.consilium.europa.eu/media/33458/23-euco-art50-guidelines.pdf

UK Government's Future Partnership Paper on future customs arrangements published on 15 August 2017: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/637748/Future_customs_arrangements_-_a_future_partnership_paper.pdf

Guidance for traders:

Guidance from HM Revenue & Customs on how to classify imports and exports using the UK Trade Tariff: https://www.gov.uk/guidance/classification-of-goods

Guidance from HM Revenue & Customs on rules of origin for imported and exported goods and help identifying which qualify for lesser customs duty: https://www.gov.uk/guidance/rules-of-origin

Guidance from the European Commission on how to apply for a BTI decision: https://ec.europa.eu/taxation_customs/business/calculation-customs-duties/what-is-common-customs-tariff/binding-tariff-information-bti-apply_en

The European Commission's TARIC database which helps traders to determine the level of customs duty their products would be subject to upon importation to the EU as a third country: http://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=en

Guidance from the European Commission on its Economic Partnership Agreements including links to guidance on the associated rules of origin: http://trade.ec.europa.eu/tradehelp/list-arrangements-and-rules-origin

Guidance from the European Commission on non-preferential rules of origin rates that apply to goods being imported into the EU under standard MFN tariff rates: https://ec.europa.eu/taxation_customs/business/calculation-customs-duties/rules-origin/nonpreferential-origin/introduction_en

Guidance from the European Commission to help the banking and finance sectors prepare in the event of a no-deal scenario: https://ec.europa.eu/info/publications/180208-notices-stakeholders-withdrawal-uk-banking-and-finance_en

Guidance from the World Trade Organisation about the EU's MFN tariff rates and related quotas: https://www.wto.org/english/tratop_e/tariffs_e/tariff_data_e.htm

Guidance from the World Customs Organisation on the process of accumulation / cumulation of rules of origin provisions thereby broadening the definition of originating products: http://www.wcoomd.org/en/topics/origin/instrument-and-tools/comparative-study-on-preferential-rules-of-origin/specific-topics/study-topics/cum.aspx

Guidance from the World Customs Organisation on rules of origin including the distinctions between preferential and non-preferential rules of origin: http://www.wcoomd.org/-/media/wco/public/global/pdf/topics/origin/instruments-and-tools/guidelines/guidelines-on-certification-endorsed-july-2014-en.pdf?db=web

Guidance from the British Standards Institution about the impact of Brexit on regulated product conformity assessment: https://www.bsigroup.com/LocalFiles/en-GB/Brexit/Brexit-product-conformity.pdf

Guidance from the European Medicines Agency for MAHs about the impact of Brexit on medicinal products for human and veterinary use: http://www.ema.europa.eu/docs/en_GB/document_library/Regulatory_and_procedural_guideline/2017/11/WC500239369.pdf

Guidance from the European Chemicals Agency to help the chemicals sector prepare in the event of a no-deal scenario: https://echa.europa.eu/advice-to-companies-q-as/general

Guidance on intellectual property rights post-Brexit, including a list of what has been agreed so far: https://academic.oup.com/jiplp/advance-article/doi/10.1093/jiplp/jpy075/5033029

Guidance on intellectual property rights post-Brexit, including practical steps businesses should take: https://www.slaughterandmay.com/media/2536734/brexit-essentials-ip-rights-post-brexit.pdf

IoD online resources:

The IoD's proposal for a partial customs arrangement with the EU covering all industrial goods and some limited processed agricultural goods: https://www.iod.com/customisingbrexit

The IoD's information and advice service hub for members: https://www.iod.com/services/information-and-advice

The IoD's Navigating Brexit hub detailing the Institute's Brexit work and activities: https://www.iod.com/news-campaigns/brexit#tab-Events

The IoD's Legal Helpline service for its members: https://www.iod.com/services/information-and-advice/legal-helpline

The IoD's Tax Helpline service for its members: https://www.iod.com/services/information-and-advice/tax-helpline

The IoD's new Policy Voice hub: https://policyvoice.iod.com/hub

The IoD's list of upcoming events: https://www.iod.com/events-community/events

The IoD's latest campaigns and positions on Brexit: https://www.iod.com/news-campaigns/brexit

Author

Allie Renison
Head of EU and Trade Policy

Allie leads the IoD's work putting forward the members' priorities for Brexit, and explores methods of expanding the UK's global reach in trade and investment.

Institute of Directors

For further information on this report, please contact:

Claudia Catelin
EU and Trade Analyst
+44 (0)20 7451 3282
claudia.catelin@iod.com

The Institute of Directors

The IoD has been supporting businesses and the people who run them since 1903. As the UK's longest running and leading business organisation, the IoD is dedicated to supporting its members, encouraging entrepreneurial activity and promoting responsible business practice for the benefit of the business community and society as a whole.

iod.com

Training
Events
Networks
Mentoring
Research
Influencing