

The Investor's Holdco Protocol

Redacted Binder Sample

This document is a redacted excerpt of an actual delivered mandate. All client identities, registration numbers, monetary figures, and counterparty references have been removed under Slovak Bar Association confidentiality rules. Document structure, content type, and depth are representative of the complete 180+ page binder delivered to engaged clients.

Bilingual: Slovak / English. Includes the 24-month autopilot calendar export (.ics) on engagement.
Refundable Strategy Session: €1,490, credited toward the Protocol if you engage within 60 days.

- administrative services for own group

4. REGISTERED CAPITAL

EUR ■,■■■ – fully paid-up in cash.

SECTION 03 · 24 pages + 12 templates

Substance Documentation Binder

Governance cadence document, board-minute templates covering the full 24-month cycle, decision logs, operational-evidence file, and accounting setup documentation. This binder is the working artifact that proves real Slovak substance at audit.

Two of the twelve minute templates are shown in sample form (Q1 board, annual UBO refresh).

MINUTES OF THE BOARD · Q■ 20■■■

Date: ■■/■■/20■■■ | Seat: Bratislava | Quorum: present

Agenda:

1. Review of Q■ operating reports of subsidiary ■■■■■■■■ s.r.o.
2. Distribution policy – resolution to retain.
3. UBO register – confirmation of unchanged status.

Resolutions adopted unanimously. Signed: ■■■■■■■■■■■■■■■■

SECTION 04 · 16 pages

§13c Qualification Dossier

Statutory analysis memo demonstrating qualifying participation under §13c of the Slovak Income Tax Act, holding-period evidence, and substance-evidence summary cross-referenced to the Substance Documentation Binder.

On a clean §13c qualification, capital gains on the qualifying participation are exempt at the Holdco level — the structural basis of the 'sell for €5M, keep €1M of it' headline.

SECTION 05 · 22 pages + templates

The 24-Hour Audit-Desk Pack

Pre-drafted response templates in English and Slovak for the most likely tax-authority queries, an evidence index keyed to the Substance binder, and an escalation flowchart. Engineered so that the first response to a Daňový úrad letter goes out within 24 hours.

Two response templates shown in the engaged version (substance challenge, beneficial-owner clarification).

SECTION 06 · Executive summary + bundle

The Buyer's-Counsel Diligence Binder

A one-page English-language structural summary plus a master index to the source-document bundle. Designed to be handed to buyer's counsel on day one of a diligence process without further translation or repackaging.

Reduces structural diligence cycles from weeks to days and removes the most common price-chip levers on cross-border CEE deals.

SECTION 07 · Synced calendar export

The 24-Month Autopilot Calendar

Google and Outlook .ics export of every recurring obligation: board cadence, UBO refresh, accounting close, §13c watch date, and the exit-readiness review.

Delivered as a synced calendar on engagement. The founder does not need to remember any of it.

SECTION 08 · 6 to 8 pages

The Post-Exit Capital Continuity Memo

Treatment of proceeds inside the Holdco after a §13c-qualified exit: reinvestment-vehicle options, distribution timing, and cross-jurisdictional withholding comparison.

Written so the founder can decide on the day of close whether to redeploy through the same Holdco or distribute — without reopening the structural question.

NEXT STEP

Book the Strategy Session

To receive the full redacted sample (representative pages from each of the eight sections) and walk through your structural posture with Robert Kilian, book the Strategy Session at **kilian.legal** or **invekl.com**.

€1,490, refundable up to 24 hours before the call, credited toward the Protocol if you engage within 60 days.

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