



OPEN EVENT
LANGUAGE: RUS/ENG

November 29, 2024
13:00 – 19:00 **AEB Taxation Committee Conference**

**AEB Conference
Center**
(Butyrsky Val St. 68/70
b.1, office 13)

TAX RESULTS OF THE YEAR. DIALOGUES ON WHAT MATTERS

PROGRAM

12:30 – 13:00 **REGISTRATION & WELCOME COFFEE**

13:00 – 13:15 **OPENING REMARKS**
Tadzio SCHILLING, AEB CEO

13:15 – 14:45 **PLENARY SESSION. OVERVIEW AND TRENDS IN THE DEVELOPMENT OF TAX
LEGISLATION**

Moderator: **Nina GOULIS**, Chairperson of the AEB Taxation Committee

Invited speakers:

Alexey SAZANOV, State Secretary - Deputy Finance Minister

Julia SHEPELEVA, Deputy Head of the Federal Tax Service

Andrey MAKAROV, Chair of State Duma Committee on Budget and Taxes *

Olga ANUFRIEVA, First Deputy Chair of State Duma Committee on Budget and Taxes *

Mikhail ORLOV, Chairperson of Expert Council of State Duma Committee on Budget and
Taxes, Head of the Legal and Taxation Department, Partner, Kept

DISCUSSION. Q&A SESSION

14:45 – 15:00 **COFFEE-BREAK**

15:00 – 16:30 **CORPORATE RESTRUCTURING: TAX CONSEQUENCES AND RISKS**

Moderator: **Ksenia LITVINOVA**, Deputy Chairperson of the AEB Taxation Committee

Invited speaker:

Dmitry SATIN, Deputy Head of the Federal Tax Service *

CHALLENGES IN JUSTIFYING BUSINESS PURPOSE AND TAX RECONSTRUCTION IN DISPUTES OVER CORPORATE RESTRUCTURINGS AND OPERATING MODELS

Dmitry KNIZHENTSEV, Partner, Tax Policy and Controversy Leader, B1 Group

TAX RISKS ON SALES OF STAKES AND SHARES

Anton NIKIFOROV, Head of AEB Taxation Committee's Working Group on Domestic
Operational Activities, Partner, Pepeliaev Group

MERGERS AND ACQUISITIONS: TAX IMPLICATIONS

Marina GOLUBENTSEVA, Partner, Bellerage

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APPROACHES TO TAXATION OF GAIN ON CORPORATE REORGANISATION

Kirill VIKULOV, Partner, Melling, Voitishkin and Partners

DISCUSSION. Q&A SESSION

16:30 – 16:45 COFFEE-BREAK

16:45 – 17:45 DEVELOPMENT OF COURT PRACTICE. TOPICAL ISSUES

Moderator: *tbc*

DEVELOPMENT OF JUDICIAL PRACTICE IN INTERNATIONAL STRUCTURES: ADDITIONAL WITHHOLDING TAX

Sofia TSYRYULNIKOVA, Head of Tax Practice, SCHNEIDER GROUP

"ALL-IN" - HOW TAX AUTHORITIES MAY CHALLENGE MASS CREATION OF IT COMPANIES. RISKS OF PROFIT FRAGMENTATION FOR MNES

Anton ZYKOV, Partner, Head of Tax Disputes Resolution Group, BST Consulting

RISKS OF SUBSIDIARY LIABILITY FOR TAX OFFENCES

Julia BOBROVA, Counsel, EPAM Law

DISCUSSION. Q&A SESSION

17:45 – 18:00 CLOSING REMARKS

Nina GOULIS, Chairperson of the AEB Taxation Committee

18:00 – 19:00 BUFFET & NETWORKING

Working language: Russian. English interpretation will be provided upon preliminary request only

Contact persons: **Registration:** **Polina Skorovarova**, Events Coordinator, tel.: +7 965 216 43 59, e-mail: polina.skorovarova@aebrus.ru

Program: **Anna Tsiulina**, Senior Committee Coordinator, anna.tsiulina@aebrus.ru

** invited*

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