

BUSINESS MEETING
Language: RUS/ENG

15 April 2015
Ararat Park Hyatt,
Hall "Sargsyan"
4, Neglinnaya str.
Moscow

Business meeting organized by the AEB Taxation Committee

CROSS-BORDER INTERCOMPANY TRANSACTIONS: RISKS AND SOLUTIONS

PROGRAMME

08:30 - 09:00 REGISTRATION AND WELCOME COFFEE

09:00 - 09:20 **OPENING REMARKS** Alina Lavrentieva, Chairperson of the AEB Taxation Committee, PwC

09:20 - 11:00 **SESSION 1**

DEVELOPMENT OF THE RECENT PRACTICE OF CROSS-BORDER INTERCOMPANY TRANSACTIONS:

-Mazda case, SUN InBev case, Equant case and other important cases
-Oriflame case

INTERNATIONAL PRACTICE: AMAZON CASE, GOOGLE CASE AND OTHER IMPORTANT CASES

EXPERTS' ROUND TABLE "RUSSIAN AND FOREIGN CASES - SIMILARITIES AND DIFFERENCES"

Moderator: Alina Lavrentieva, Chairperson of the AEB Taxation Committee, PwC
Experts: Dzhangar Dzhalthinov, Dentons; Natalia Faizrakhmanova, Pepeliaev Group; Oleg Akilbaev, Oriflame; Angelos Benos, Deloitte & Touche; Evgeny Timofeev, Goltsblat BLP

11:00 - 11:20 COFFEE BREAK

11:20 - 13:00 **SESSION 2**

BEPS - QUO VADIS?

NEW LEGISLATIVE INITIATIVES AND THEIR IMPACT ON THE MULTINATIONAL COMPANIES:

-Draft law on thin capitalization
-Draft law on unjustified tax benefit
-Draft law on criminal liability for tax evasion through CFCs and controlled transactions

**MUTUAL AGREEMENT PROCEDURES AS AN ALTERNATIVE WAY OF DISPUTE
RESOLUTION**

**EXPERTS' ROUND TABLE "TAX PLANNING AND PROTECTION OF TAXPAYERS'
RIGHTS IN THE NEW ENVIRONMENT"**

Moderator: Vadim Zaripov, Deputy Chairperson of the AEB Taxation Committee,
Pepeliaev Group

Experts: Alexei Nesterenko, Ernst & Young; **Mikhail Orlov**, KPMG; **Arseny
Seidov**, Baker & McKenzie

Working language: Russian. Interpretation will be provided.

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