

25 October 2018

PwC premises
10, Butyrskiy Val str.
Moscow

Business meeting organized by the AEB Taxation Committee

INTRA-GROUP TRANSACTIONS: CHALLENGES AND TRENDS

Programme

08:30 - 09:00 **REGISTRATION AND WELCOME COFFEE**

09:00 - 09:15 **OPENING REMARKS: Dr. Alina Lavrentieva**, Chairperson of the AEB Taxation Committee, PwC

09:15 - 11:00 **SESSION 1**

- Justification and documentary support of intra-group services: still relevant
- Requalification of one types of intra-group transactions into other ones for withholding tax purposes: protection strategy
- Concerning court practice: Lebedyansky and Continental Tires cases
- VAT on electronically supplied intra-group services

Experts: Dzhangar Dzhchalchinov, Dentons; **Nina Goulis**, KPMG;
Alexander Erasov, Bryan Cave Leighton Paisner; **Arseny Seidov**, Baker McKenzie

11:00 - 11:30 **COFFEE BREAK**

11:30 – 12:50 **SESSION 2**

Transfer pricing issues in intra-group transactions:

- New in legislation and court practice
- Planned changes in the OECD transfer pricing guidelines on intragroup services
- Approach of the Russian tax authorities to the pricing in intra-group services - will TP-documentation save?
- Transfer pricing and customs value: European practice, recommendations of the Eurasian Economic Union and implications for taxpayers

Experts: Dmitry Kulakov, Deloitte; **Anton Pischalnikov**, PwC;
Ksenia Litvinova, Pepeliaev Group; **Ljusine Satiyan**, EY

12:50 – 13:00 **CLOSING REMARKS: Vadim Zaripov**, Deputy Chairperson of the AEB Taxation Committee, Pepeliaev Group

13:00 – 14:00 **NETWORKING RECEPTION**

Working language: Russian. Interpretation into English will be provided upon prior request.

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