



**OPEN EVENT**  
**LANGUAGE: RUS/ENG**

**December 3, 2024**    **AEB Taxation Committee Conference**  
**13:00 – 19:00**

**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 – 13:30**    **KEY CHANGES IN TAX LEGISLATION**  
Nina **GOULIS**, Chairperson of the AEB Taxation Committee

**13:30 – 14:30**    **DEVELOPMENT OF COURT PRACTICE. TOPICAL ISSUES**

**Moderator:**    **Evgeny TIMOFEEV**, Managing Partner, Zalesov, Timofeev, Gusev and Partners

**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**

**14:30 – 14:45**    **COFFEE-BREAK**

**14:45 – 16:15**    **CORPORATE RESTRUCTURING: TAX CONSEQUENCES AND RISKS**

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

**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

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## MERGERS AND ACQUISITIONS: TAX IMPLICATIONS

Marina **GOLUBENTSEVA**, Partner, Bellerage

## APPROACHES TO TAXATION OF GAIN ON CORPORATE REORGANISATION

Kirill **VIKULOV**, Partner, Melling, Voitishkin and Partners

## DISCUSSION. Q&A SESSION

**16:15 – 16:45** COFFEE-BREAK

**16:45 – 18:00** DIALOGUES ON WHAT MATTERS. 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

## DISCUSSION. Q&A SESSION

**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](mailto:polina.skorovarova@aebrus.ru)

**Program:** Anna **Tsiulina**, Senior Committee Coordinator, [anna.tsiulina@aebrus.ru](mailto:anna.tsiulina@aebrus.ru)

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