



Association
of European
Businesses

OPEN EVENT
Language: ENG

03 April 2015
AEB Conference Centre
Ul. Krasnoproletarskaya
16, bld.3, floor 4, office 8,
Moscow

**Open event organized by the AEB Intellectual Property
Committee and the AEB Taxation Committee**

TAX RELATED ASPECTS OF INTELLECTUAL PROPERTY TRANSACTIONS

PROGRAMME

Moderators: **Eugene Arieovich**, Chairman of the AEB Intellectual Property Committee, Partner, Baker & McKenzie, and **Alina Lavrentieva**, Chairperson of the AEB Taxation Committee, Partner, PwC

14:00 – 14:30 **REGISTRATION AND WELCOME COFFEE**

14:30 – 14:40 **OPENING REMARKS**

4:40 – 15:00 **Borderline between Saas and licensing relationships (in the context of the Russian Civil Code and court practice).**
Arseny Seidov, Partner, Baker & McKenzie

15:00 - 15:20 **Specific features of VAT exemption applicable to license contracts.**
Kirill Roubalsky, Senior associate, Russian Tax and Customs practice, Dentons

License payments inclusion into customs value of imported goods.
Inna Elisanova, Senior associate, Russian Tax and Customs practice, Dentons

15:20 – 15:40 **Case law regarding tax disputes about whether license payments within a group of companies are justified and about the amount of these license payments.**
Natalia Faizrakhmanova, Senior Associate, Pepeliaev Group

15:40-16:00 **COFFEE-BREAK**

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- 16:00-16:20** **Free EULAs taxation.**
Evgeny Timofeev, Partner, Head of Russian/CIS Tax Practice, Goltsblat BLP LLP
- 16:20 – 16:40** **Transfer pricing of intangibles (pricing methodologies and compliance insights).**
Angelos Benos, Partner, Tax & Legal/Transfer Pricing Services, ZAO Deloitte & Touche CIS
- 16:40 – 17:00** **Tax issues associated with creation of the local content based on the formats received under the license agreements.**
Alexander Kozlov, Senior Manager, Tax & Legal Services | Technology, Communications, Entertainment & Media, PwC
- 17:00 – 17:10** **Q & A Session, Discussion**
- 17:10 – 17:30** **Cocktail and informal get-together**

Working language: Russian and English. Interpretation will not be provided.

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