

3RD ANNUAL

INTERNATIONAL TAXATION IN CEE

18 to 19 October 2012 • Prague, Czech Republic • Registration Call +44 203 286 4071



SPEAKERS:

Wolfgang Buettner
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Tax Treaty, Transfer Pricing and Financial
Transactions Division
[OECD](#)

Dr. Wolfgang Salzberger
Head of International Tax
[Linde AG](#)

Georg Berka
Head of Tax Transfer Pricing
[Raiffeisen Bank International AG](#)

Ulrich Scheuerle
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International Tax Manager
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Senior Indirect Tax Manager
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Nick Hasenoehrl
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[IBM, Austria](#)

Dr. Pia Dorfmueller
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Peter Ch. Loeschl
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Previous CEE Tax Conference Testimonials:

Why?

Central & Eastern Europe has traditionally had favourable tax regimes to attract investment however the Taxation landscape is undergoing a rapid change.

Recent research has shown that Tax authorities are keen to target discrepancies on Transfer Pricing. Cross Border controls on Transfer Pricing are coming under increased scrutiny as they often can be a source of Tax revenue.

Central & Eastern Europe provide a wide range of Taxation challenges. Tax professionals have to deal with a raft of new measures including new documentation requirements, Audits by Tax authorities and new Tax and Transfer Pricing related legislation. Achieving Tax compliance and minimising Tax Risks and Disputes are some of the key challenges facing Tax executives in the region.

Benefits of Attending:

- The OECD presents the latest developments on Transfer Pricing and attribution of profits to Permanent Establishments
- Understand the Approach of the tax authorities toward tax optimization restructuring
- Case studies on Tax planning and Tax optimization and profit repatriation strategies.
- Clarify on current uncertainties in Transfer Pricing, valuation of intangibles, deduction of HQ charges and Transfer Pricing documentation
- Hear about Effective strategies to manage a Tax audit in CEE
- Panel discussions on Group Taxation regimes, Loss utilization
- Updates by local tax authorities and Ministry of Finance
- Cases studies on Indirect Tax compliance and VAT treatment of consignments stocks

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Well organised, one of the very few events focusing really on CEE tax matters.

Tax Manager – EMEA Intercompany &
Transfer Pricing
IBM, Austria

Excellent networking opportunities, great mix of speakers from advisory, industry and tax authorities. Excellent topics with a strong focus on practical relevance and experience exchanged.

Director Tax CEE, Middle East, Greece & Turkey
Hewlett-Packard Europa Holding B.V.

This forum is an excellent opportunity to interact with peers and exchange experiences and best practices on current topics. Focused rather on practice than theory.

Senior Tax Manager EMEA
Flextronics International GMBH, Austria

Excellent forum to be informed on recent topics and discuss with advisors, industry and tax authorities. Focus is on practical approach.

Senior Tax Manager
MAGNA Automotive Holding AG



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08.30 Registration & Morning Coffee

09.00 Chair Opening Address

Nick Hasenoehrl
Tax Director Europe
Haemonetics, Switzerland

09.10 Session

Transfer Pricing in CEE - An Overview

- Specifics on transfer pricing practice in Poland and selected CEE countries
 - Local benchmarks
 - APA practice
- Transfer pricing valuation of intangibles
 - Key issues coming from the OECD discussion draft "Revision of special considerations for intangibles" in Chapter VI of the OECD Transfer Pricing Guidelines and related provisions
- Transfer pricing controversy
 - Interesting court rulings

Aneta Blazejewska-Gaczynska
Partner, Transfer Pricing & Tax Effective Supply Chain Management
Ernst & Young Poland

09.50 Session

Group Taxation Regimes and cross border loss utilisation- Panel Discussion

- The Austrian group taxation system: A tool for cross-border tax-planning
- Requirements to be met to benefit from group taxation regime / shareholder thresholds
- Transfer of losses from subsidiaries to parent company
- Benefits (pros and cons) flat tax regimes vs high tax jurisdictions
- Potential risks and maintaining compliance

Peter Ch. Loeschl Michaela Petritz-Klar
Senior Consultant Partner
Austrian Business Agency WEBER & CO.

10.30 Morning Refreshments & Networking

10.50 Session

OECD developments in the area of Transfer pricing and attribution of profits to Permanent Establishments

Wolfgang Buettner
Transfer Pricing Advisor
OECD

11.30 Session

Tax supply chain structures: CEE experience (a Tax Director's perspective)

- Different types of tax effective supply chain structures
- Permanent establishment risks (recent court rulings)
- Commissionaire implementation in CEE region

Nick Hasenoehrl
Tax Director Europe
Haemonetics

12.10 Session

Structuring of Cash pooling arrangements in CEE

- Legal framework for cash pooling in CEE
- Transfer Pricing implications
- Interest deductibility
- Withholding Tax and VAT implications

Matteo Ascari
International Tax Manager
Indesit

12.50 Lunch & Networking

14.00 Session

Tax efficient cross-border financing structures - Panel Discussion

- Subsidiary finance structures
- Tax treaties and recent developments and its impact on cross-border financing
- Optimisation of financial costs within the group through application of hybrid instruments (hybrid financing ideas)
- Examples of international structures

Senior Tax Partners
White & Case

15.00 Session

Management fees and transfer pricing in CEE

- Conditions that multinational companies face in CEE jurisdictions including Ukraine to deduct intercompany service charges
- Benchmarking and Documentation challenges
- Best practices for minimizing the possibility of double taxation.

Georg Berka
Head of Tax Transfer Pricing
Raiffeisen Bank International AG

15.40 Afternoon Refreshments & Networking

16.00 Session

Practical Tax and Transfer pricing issues related to funding of group wide projects

- Focus on CEE: Russia, Hungary, Poland, Czech Republic, Slovakia, Bulgaria, Romania
- Recent important court Cases (intergroup guarantees, commissionaire structures)

Developments in TP audits:

- International cooperation – EU multi lateral controls
- Usage of database searches for comparables

Ulrich Scheuerle
Head of Tax
Erste Group Bank AG

16.40 Session

Tax implications for Business Reorganizations

- Tax efficient strategies for Business reorganizations
- General tax risks and planning
- Object of the transaction and detailed tax implications
- Valuation of intangibles : practical problems

Jadwiga Latawiec
Legal & Tax Director
Carlsberg Poland

17.20 Session

Reorganizations and M&A Transactions:

- Overview of tried and tested acquisition structures
- Use of holding company regimes
- Deductibility of interest and other costs

Dr. Pia Dorfmueller
Partner
P+P Pöllath + Partners

18.00 Evening Drinks Reception & Networking

End of Day 1

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08.30 Registration & Morning Coffee

09.00 Chair Opening Address

Nick Hasenoehrl
Tax Director Europe
Haemonetics, Switzerland

09.10 Session

Taxation in Russia: Recent developments

- The latest developments in Tax legislation in Russia and international Tax planning
- Key changes that MNC investors should know
- Tax issues debt financing / debt pushdown
- New Transfer Pricing regulations
- Tax issues pertaining to sales and marketing offices, joint ventures

Irina Dmitrieva
Partner
White & Case, Russia

09.50 Session

Tax executives' perspective on Managing a Tax Audit: Panel Discussion

- Best Practices in successfully handling a Tax audit
- What types of transactions attract attention of tax authorities
- Reduced profitability due to reorganised supply chain, royalties / technology license fees to low tax jurisdictions,
- Working with tax authorities and information requests
- Penalties and exemptions, assessments, objections and appeals process
- Alternative Tax Audit regime

Markus Baur
Tax Manager – EMEA Intercompany & Transfer Pricing
IBM, Austria

10.30 Morning Refreshments & Networking

10.50 Session

Single European VAT: Further developments on Green Paper and future of VAT

Blanka Mattauschová
Head of Indirect Tax Department
Ministry of Finance Czech Republic

11.30 Session

Indirect Tax Compliance in CEE

- Recent VAT / Indirect Tax developments
- Developments related to E- Invoicing
- Practical VAT issues in cross border transactions

Iveta Grossova
VAT Compliance Manager
Johnson Controls

12.10 Session

Indirect Tax aspects of Consignment stocks

- General VAT treatment of consignment stocks
- Simplification rules in different EU member states
 - conditions for the application
 - administrative requirements
 - possible risks of the application of simplification rules

Diana Ellenberg
Indirect Tax Manager
ThyssenKrupp AG

12.50 Lunch

13.50 Session

Electronic invoicing in Europe

- VAT legislative framework
- Current e-invoicing scene – a view on current standards from Poland's perspective
- Harmonization of VAT invoicing rules in the EU (waiting for January 1, 2013)
- E-invoicing from large and small and mid-size entities' (SME) perspective
- E-invoicing benefits and drawbacks
- Case study – implementation of e-invoicing solution

Piotr Hulewicz
Tax Director
Suedzucker Polska

14.20 Session

R&D Tax Reliefs and other Tax incentives in CEE

- Nature of incentives /Current incentives in Austria
- Eligible entities and qualifying costs
- Super Tax deduction / refundable tax credit
- Technology incentives
- IP and other jurisdictional restrictions
- Other concerns

Peter Ch. Loeschl
Senior Consultant
Austrian Business Agency

15.00 Afternoon Refreshments & Networking

15.15 Session

Technology Solutions for Improving the Tax Function in Shared Service Centres

- Reviewing the SSC Tax Strategy
- Increasing the efficiency of Tax compliance in a SSC while decreasing overhead costs
- Automating flow of information from ERP systems
- Investing in technology: new solutions

To be confirmed
Vodafone Operations Centre Hungary

16.00 Session

Permanent Establishment Rules - Tax Directors perspective

- Definition of PE's (scope and income)
- Recent PE cases and challenges
- Deputing employees abroad
- Business reorganizations transfer of assets to a Permanent Establishment

Dr. Wolfgang Salzberger
Head of International Tax
Linde AG

16.40 Closing remarks from the chair

End of conference

Day 2