



*2014 IFA CEE Regional Congress
Prague, Czech Republic*

CENTRAL EASTERN EUROPE REGIONAL CONGRESS | PRAGUE

FEBRUARY 5–6, 2014

PROGRAMME

VAT | FRAUD – RESPONSIBILITIES, OBLIGATIONS, MEASURES
BEPS | OECD'S BASE EROSION AND PROFIT SHIFTING ACTION PLAN
TPI | INTANGIBLES AND RISKS
TPII | FINANCIAL TRANSACTIONS AND INTEREST DEDUCTION
MAP | DTT or ARBITRATION CONVENTION – which way to go?

VENUE

CHARLES UNIVERSITY | FACULTY OF LAW | PRAGUE, CZECH REPUBLIC

REGISTRATION & HOTELS

<http://ifa-cr.cz/en/events.html>

ORGANIZATION

IFA CZECH REPUBLIC | www.ifa-cr.cz
IFA POLAND | www.ifa.org.pl

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PROGRAMME

WEDNESDAY, FEBRUARY 5, 2014 | 2.00 P.M. – 6.00 P.M.

WELCOME

Lenka Fialková, *President of IFA Czech Republic*
Porus Kaka, *President of the International Fiscal Association*
Włodzimierz Nykiel, *Chairman of the Supervisory Board, IFA Poland*

HOW CAN HONEST TAXABLE PERSONS PROTECT THEMSELVES AGAINST VAT FRAUD?

Our panellists will discuss how to recognize VAT fraud and what are the responsibilities and obligations of the taxpayers and what measures they have to implement in order to protect themselves against being involved in VAT fraud.

Chair:

Hannes Gurtner, *LeitnerLeitner, Austria*

Speakers:

Radek Hála, *Ministry of Finance, Czech Republic*
Stefan Maunz, *KMLZ, Member of VAT Expert Group of the EU Commission, Germany*
Tomasz Michalik, *MDDP, Poland*
EU Commission VAT Department to be confirmed
Ministry of Finance, Hungary to be confirmed

After the session all participants are cordially invited to a Cocktail reception.

THURSDAY, FEBRUARY 6, 2014 | 9.00 A.M. – 5.00 P.M.

OECD'S BASE EROSION AND PROFIT SHIFTING ACTION PLAN: THE ROUTE TOWARDS GLOBALLY ADDRESSING BASE EROSION AND PROFIT SHIFTING?

The BEPS session is aimed at clarifying the position of the OECD and tax administrations of various jurisdictions on tax planning strategies, which are addressed by the BEPS report.

Chair:

Porus Kaka, *President of the International Fiscal Association*

Speakers:

Marlies De Ruiter, *OECD*
Zdeněk Hrdlička, *Ministry of Finance, Czech Republic*
Andrzej Punczewicz, *Crido Taxand, Poland*
Caroline Silberstein, *Baker & McKenzie, France*

TRANSFER PRICING ISSUES

The panel will address fundamental transfer pricing issues, such as economic substance in the transfer pricing framework, relevance of contractual arrangements, conduct of the parties and people functions. It will also focus on tax risks relating to intangibles and interest deductibility in financial transactions. Leading international judgments on transfer pricing will be explained on case studies.

Chair:

Xaver Ditz, *Flick Gocke Schaumburg, Germany*

Speakers:

Radim Bláha, *General Financial Directorate, Czech Republic*
Renata Bláhová, *BMBLeitner, Slovak Republic*
Marlies De Ruiter, *OECD*
Monika Laskowska, *Ministry of Finance, Poland*
Caroline Silberstein, *Baker & McKenzie, France*

MUTUAL AGREEMENT PROCEDURE UNDER DTT OR UNDER ARBITRATION CONVENTION OR DOMESTIC LITIGATION - WHICH WAY TO GO IN THE CEE REGION?

International tax planning strategies resulting in arbitrage often lead to MNEs' tax returns being challenged by tax authorities in multiple jurisdictions. Is this an issue in CEE? How should a strategy be tailored to potential multi-jurisdictional disputes in the region? A panel of tax officials, tax practitioners and academics will look into a case study and identify the most important issues that need to be taken into consideration when formulating a strategy.

Chair:

Dariusz Wasylkowski, *Wardyrński & Partners, Poland*

Speakers:

Xaver Ditz, *Flick Gocke Schaumburg, Germany*
Cezary Krysiak, *Ministry of Finance, Poland*
Michal Roháček, *General Financial Directorate, Czech Republic*
Speaker from Romania to be confirmed

After the session all participants are cordially invited to get together with the members of the IFA Permanent Scientific Committee at a Cocktail Reception.