



**The International Fiscal Association, the Slovak Republic**

has the pleasure to invite you to the regional IFA SR conference:

**TRANSFER PRICING: First Years' Practical Experience**

**Venue:** Offices of DeloitteTax k.s. – Digital Park II, Einsteinova 23, 851 01 Bratislava

**Date:** 14 June 2011

organized under the auspices of **Deloitte Tax k.s.**

**Programme:**

The morning session will be moderated by Tomáš Ciran, Vice-president of IFA Slovak Republic.

**9.00 – 9.15** Opening

**9.15 – 10.00** Amendments to OECD directives applicable since 2010 including the practical importance of pricing methods equalisation and an overview of relevant case law and tax administration guidelines in neighbouring countries

Speaker: Judita Kuchtová, BMB Leitner

**10.00 – 10.45** Practical experience of a tax inspector including cases where the other contracting state requires a corresponding tax base adjustment

Speaker: Ing. Dalila Kutišová Luknárová, Tax office for selected taxpayers

**10.45 – 11.00** BREAK

**11.00 – 11:45** Transfer pricing of financial transactions (loans, collaterals, comparability of transactions, binding offers by banks, credit rating)

Speaker: František Csefalvay, Ernst & Young SR

**11.45 – 12:30** Experience with tax inspections in Slovakia (assembly plant vs entrepreneur, fixed cost of services and allocation without a surcharge)

Speaker: Michal Antala, Deloitte

**12.30 – 13.30** LUNCH

The afternoon session will be moderated by Renáta Bláhová, President of IFA Slovak Republic.

**13.30 – 14.15** Practical experience with tax inspections in neighbouring countries (Czech Republic, Hungary, Poland)

Speaker: Zuzana Blažejová, KPMG

**14.15 – 15.00** The most common business models of production, sale and service provision – specific features from transfer pricing perspective

Speaker: Alexandra Jašicová, PWC

**15.00 – 15.30** DISCUSSION and closing

**Applications:**

**Fee (incl. VAT):**

- **IFA SR members:** EUR 200
- **IFA SR non-members:** EUR 260

**Application close:** 6 June 2011

The number of participants is limited to 50.

We kindly ask you to remit the attendance fee until 6 June 2011 to the account No. 2629206451 / 1100 with Tatra banka, a.s.

Please send your applications in electronic form to the below address of the contact person.

Contact person: [amatuskova@deloitteCE.com](mailto:amatuskova@deloitteCE.com)

For more information on the non-governmental organisation IFA see: [www.ifa-sr.sk](http://www.ifa-sr.sk)