

## EVENT PROGRAM\*

As of 08.02.2019

Time	Topics of reports	Speakers
9:00 – 9:30	<b>Registration. Welcoming coffee</b>	
9:30 – 10:00	Welcome address to the participants	<b>Nina Yuzhanina</b> , Chairman of the Committee on Taxes and Customs Policy of Ukrainian Parliament, Verhovna Rada (to be confirmed) <b>Bogdan Dubas</b> , Director, Derzhzovnishinform (DZI)
10:00 – 11:45	<b>Session 1. The latest changes – view of the Government</b>	
10:00 – 10:20	Recent amendments to the Tax Code of Ukraine on Transfer pricing. Relevance of the type of assets and their usage on the Transfer pricing justification	<b>Sergiy Verlanov</b> , Deputy Minister of Finance of Ukraine (to be confirmed) or <b>Tatiana Ostrikova</b> , Member of the Committee of the Verhovna Rada on Taxes and Customs (to be confirmed)
10:20 – 10:40	Annual financial reporting and tax result from transactions with low tax territories or legal form of the entity. Transfer pricing justification procedure; profit or loss adjustment.	<b>Olexsiy Zadorozhniy</b> , Acting Director of Department of Methodology and Regulatory Development of the State Fiscal Service of Ukraine (SFSU) (to be confirmed) <b>Vycheslav Krugliyak</b> , Head of the Transfer Pricing Inspection Department, Audit division of the State Fiscal Service of Ukraine (to be confirmed)
10:40 – 11:00	APA experience of the Ministry of Finance and Ukrainian Tax Service as to Transfer pricing application. Bonuses, writing-off debts, distribution of dividends, third-party payments etc.	<b>Vitaliy Smerdov</b> , junior partner Crowe LF Ukraine
11:00 – 11:20	(to be confirmed)	<b>Mikola Mishin</b> , KPMG (to be confirmed)
11:20 – 11:45	<b>Questions &amp; Answers</b>	
11:45 – 12:10	<b>Coffee Break</b>	
12:10 – 13:45	<b>Session 2. International Angle. Transfer pricing and BEPS plan.</b>	
12:10 – 12:30	Anti-offshore draft law (BEPS). Country-by-country reports: who is to submit, requirements and content of the report. Related party's identification: threshold increase (25%) and the inclusion of the related party's criteria with indebtedness and expense allocations for a single counterparty. Extension of Transfer pricing rules applicable to "meaningful dividends". Additions to the list of Permanent Establishments.	<b>Eugeney Kozlov</b> , Counselor to the Minister of Finance of Ukraine, Reform facilitation office of the Ministry of Finance. (to be confirmed)
12:30 – 12:50	<b>Preventing &amp; resolving Double Taxation: APA and Mutual Agreement Procedures within the EU.</b>	<b>Federico Vincenti</b> , ILM Tax & Transfer Pricing, Crowe Valente, Italy

Organizer

State-Owned Enterprise  
«Derzhzovnishinform» (DZI)  
+380 (44) 391-34-91, 390-50-87



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Crowe LF Ukraine  
: +38 044 221-36-03



	<b>Lessons to learn for Ukrainian companies.</b>	
<b>12:50 – 13:15</b>	OECD guidance on Transfer pricing: examples of methods used. <i>Transfer Pricing Guidelines for Multinational Enterprises and Tax Administration</i> (“Guidelines”). The purpose of this lecture is to analyse in deep the main features of Transactional Net Margin Method and Profit Split method under both a theoretical and practical perspective by providing also case study where the application of the different profit level indicator and of the contribution and residual analysis will be addressed and the main issues arising from their application will be outlined	<b>Federico Vincenti</b> , ILM Tax & Transfer Pricing, Crowe Valente, Italy
<b>13:15 – 13:35</b>	Available information sources to manage tax liabilities and international tax planning for Transfer pricing	<b>Ivan Kolpashnikov</b> , Business Development Director, Thomson Reuters <i>(to be confirmed)</i>
<b>13:35 – 13:45</b>	<b>Questions &amp; Answers</b>	
<b>13:45 – 14:30</b>	<b>Lunch</b>	
<b>14:30 – 16:30</b>	<b>Session 3. Transfer pricing Report and Documentation. Examples and Recommendations.</b>	
<b>14:30 – 14:50</b>	Hands-on recommendations for Transfer pricing justification for specific transactions: Imports, Exports (carry-over stock), Corporate rights sales, Logistics, IT-services.	<b>Olga Bogdanova</b> , Partner, Crowe LF Ukraine
<b>14:50 – 15:10</b>	Interest rate assessment of foreign banks credits after February 7.	<b>Representative of the National Bank of Ukraine or/and Representative of Financial Establishment</b>
<b>14:50 – 15:10</b>	Transfer pricing in financial transactions – interest rates, royalty, etc.	<i>(to be confirmed)</i>
<b>14:50 – 15:10</b>	Typical mistakes and possible solutions for Transfer pricing documentation for Taxpayers.	<i>(to be confirmed)</i>
<b>15:10 – 15:30</b>	First report submission for Permanent Establishments and documentation preparation. What to pay attention to. Which activities to choose as comparable. Who is obliged to report? Non-for-profit organization's representative offices.	<b>Dmitry Mikhailenko</b> , Managing Partner, Crowe LF Ukraine
<b>15:30 – 15:50</b>	<b>Questions &amp; Answers</b>	
<b>15:50 – 16:15</b>	<b>Coffee Break</b>	
<b>16:15 – 18:00</b>	<b>Сесія 4. Court cases on Transfer Pricing.</b>	
<b>16:15-16:40</b>	The current attitude of the Ukrainian Tax Service in disputes with the Taxpayers in the last cases.	<b>Dmitro Pavlovich</b> , Head of Department, Administrative Appeals and Legal Support Division, State Fiscal Service of Ukraine <i>(to be confirmed)</i>
<b>16:40-17:05</b>	Transfer pricing Inspection and Dispute Resolution guidance.	<i>(to be confirmed)</i>
<b>17:05-17:25</b>	<i>(to be confirmed)</i>	<b>Nataliy Blazhivska</b> , President, International Fiscal Association Ukraine (IFA Ukraine), Judge
<b>17:25-18:00</b>	Facts used for the defense of the taxpayer in disputes and field control concerning Transfer pricing issues.	<b>Olena Zhukova</b> , Director, Audit firm Saivena-Audit

\* the Program can be changed or modified.

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