

OOO AEB BUSINESS

ul. Krasnoproletarskaya 16, bld. 3 • 127473, Moscow • Russian Federation Tel.: +7 (495) 234 2764 • www.aebrus.ru • Fax: +7 (495) 234 2807

Transfer pricing – New challenges

Thursday, October 24th, 2013 9:30 – 12:30 (registration starts at 9:00) Ararat Park Hyatt, Hall "Sargsyan", 4 Neglinnaya str.

Business Meeting

Chaired by Dr. Alina Lavrentieva, PwC partner, Chairperson of the AEB Taxation Committee

09:30-10:45	Grouping of transactions for Transfer Pricing notification purposes Ilarion Lemetyuynen, KPMG Treatment of start-up (or product line) losses for Russian trading companies Svetlana Stroykova, Partner, PwC Acceptability of foreign benchmarking studies when testing the profitability of foreign parties Arseny Seidov, Partner, Baker & McKenzie Expert opinion: Dmitry Volvach, Federal Tax Service, Andrey Kizimov, RF Ministry of Finance
10:45- 11:00	COFFEE BREAK
11:00-12:30	Valuation of intangibles for Transfer Pricing purposes: OECD approach and Russian realities Gennady Timonichev, Pepeliaev Group BEPS report and its relevance to Transfer Pricing – is it time to a big change? Steve Cawdron, EY Risk assessment for Transfer Pricing purposes – are you ready to meet you your Transfer Pricing auditor? Aggelos Benos, Deloitte Expert opinion: Dmitry Volvach, Federal Tax Service, Andrey Kizimov, RF Ministry of Finance

Working languages: Russian and English, simultaneous translation will be provided

Program: Julia Kucherova, AEB Taxation Committee Coordinator, 234-27-64, ext.150; Julia.Kucherova@aebrus.ru

Registration: Tatyana Barysheva, AEB Events Coordinator, 234-27-64 ext. 127; Tatiana.Barysheva@aebrus.ru