

01 March 2017
Ararat Park Hyatt,
Hall "Sargsyan"
4, Neglinnaya str.
Moscow

Business meeting organized by the AEB Taxation Committee

BENEFICIAL OWNER OF INCOME – PRACTICAL ASPECTS

PROGRAMME

09:00 - 09:30 **REGISTRATION AND WELCOME COFFEE**

09:30 - 09:45 OPENING REMARKS: **Dr. Alina Lavrentieva**, Chairperson of the AEB Taxation Committee, PwC

09:15 - 11:00 **SESSION 1**

AMENDING DOUBLE TAX TREATIES BY MLI - IMPACT ON BENEFICIAL OWNERSHIP CONCEPT

COURT PRACTICE OVERVIEW: REASONS FOR FAILURE AND SECRETS OF TAXPAYERS' SUCCESS

Experts: **Mikhail Filinov**, PwC; **Nina Goulis**, KPMG; **Victor Kalgin**, EY

11:00 - 11:30 **COFFEE BREAK**

11:30 - 13:00 **SESSION 2**

CONFIRMATION OF BENEFICIAL OWNERSHIP AND DEFENSE FILE - PRACTICAL STEPS

- Defining beneficial owner in relation to the various types of income: dividends, interest, royalties
- Can economic intermediaries (financial companies of the group, the licensees in sublicensing relationship, etc.) be beneficial owners of income?
- Notification of the beneficial owner of income and defense file
- Tax agent responsibility and the options of using indemnity tools
- Beneficial owner of the income – basic mistakes of foreign companies in Russia

Experts: **Rustem Akhmetshin**, Pepeliaev Group; **Kirill Vikulov**, Baker & McKenzie; **Alla Zverkova**, Goltsblat BLP; **Maria Semenova**, Mazars

CLOSING REMARKS: **Vadim Zaripov**, Deputy Chairperson of the AEB Taxation Committee, Pepeliaev Group

Working language: Russian. Interpretation will be provided.

Contact person: Olga Silnitskaya, AEB Committees Coordinator, tel. (495) 234-27-64, ext. 119; Olga.Silnitskaya@aebrus.ru