



**International  
Fiscal  
Association**



# IFA UKRAINE-CYPRUS INTERNATIONAL TAX SEMINAR

November 25, 2011

Radisson Blu Hotel  
Kyiv, Ukraine

# ORGANISERS' INFORMATION

## *Hosting Branch* IFA Ukraine

IFA Ukraine is the Ukrainian branch of the International Fiscal Association (IFA). IFA Ukraine is a non-profit organization established in Ukraine in 2007. IFA Ukraine was officially recognized by IFA at the 61st IFA Kyoto Congress during September 2007.

IFA Ukraine is the only organization in Ukraine dealing exclusively with international tax matters.

IFA Ukraine has grown in a short time to over 50 members.

[www.ifa-ukraine.org](http://www.ifa-ukraine.org)

## *Co-organizer* IFA Cyprus

IFA Cyprus is a Cyprus Branch of International Fiscal Association. Organization brings together tax managers and tax consultants who are participating both directly and indirectly in the activities of Central IFA.

Since its inception, IFA Cyprus provided a blend of comprehensive research of international taxation and initiatives of current practical importance to the benefit of its Members and international peers.

IFA Cyprus is actively contributing to the developments related to international tax matters in the Cyprus, which is regarded by leading tax experts as one of the most beneficial and versatile "Holding Company Regimes" currently available in the world.

## Central IFA

International Fiscal Association (IFA), Netherlands, is the only non-governmental and non-sectoral international organization dealing with fiscal matters over the globe.

IFA brings together more than 12,000 practitioners, tax officials and academics from 100 member countries, involved in and concerned with taxation of international transactions and comparative study of tax laws.

Based in Rotterdam, IFA, since its foundation in 1938, has provided, in conjunction with the activities of each country branch, a blend of comprehensive research of international taxation and the development of programs and initiatives of current practical importance.

[www.ifa.nl](http://www.ifa.nl)

# INVITATION TO IFA UKRAINE-CYPRUS INTERNATIONAL TAX SEMINAR

Dear Colleagues!

IFA Ukraine and IFA Cyprus take a pleasure of inviting you to the first joint event of IFA Ukraine and IFA Cyprus – the International Tax Seminar.

This event is designed to serve as a platform for in-depth discussion of international tax issues arising in-between Ukraine and Cyprus, known as historically closely knitted jurisdictions.

The Seminar program will provide insights into current issues affecting cross-border investment between Ukraine and Cyprus, as well as into expected developments and their scope of impact in tax area. Perspective of other jurisdictions will also be presented.

Senior-level tax advisors from Ukraine and Cyprus will present cohesive two-sided coverage of the topics of mutual interest and importance, including the recent legislative and administrative developments as well as what issues are being pursued by in-country tax authorities. Speakers will have time to address specific questions from the attendees regarding specific fact patterns or issues.

The Seminar will take place at Radisson Blu Hotel in Kyiv, Ukraine.

We look forward to making your participation in this joint seminar meaningful to you and your professional development and our Associations' growth.

We hope you will join us in making this informative and well-attended meeting yet!

Sincerely,

*Oleh Marchenko*

President  
IFA Ukraine

*Demetris Ioannides*

President  
IFA Cyprus

# SEMINAR SPEAKERS



*Servetnyk, Andriy*  
Partner, Deloitte  
(Ukraine)

Andriy Servetnyk is a partner of Deloitte's Tax&Legal Department in Kyiv. Andriy began his career with Deloitte & Touche in 2002 after moving from Andersen office in Kyiv, Ukraine. Andriy is an International Tax Partner in Ukraine and Belarus. He specializes in corporate taxation, international tax structuring, tax and investment planning, as well as M&A projects for both large domestic businesses and multinational corporations. Andriy provides clients with complex tax advice related to IPO and issuing Eurobonds, operations through investment funds and other special purpose investment vehicles. He is also responsible for Private Clients Services.

Andriy's clients operate mainly in food & beverages, agriculture, pharmaceuticals production & trade, consumer goods retail and software development.



*Marushko, Iryna*  
Partner,  
Lavrynovych & Partners  
(Ukraine)

Ms. Iryna Marushko is a graduate from Kyiv National Economic University and University of London. She holds a master's degree in Laws.

Iryna qualified for the Ukrainian Bar in 2000. Since 2008, Ms. Marushko is a board member of the International Fiscal Association (IFA Ukraine). She is an arbitration manager since 2009.

Iryna is in charge of Lavrynovych & Partners' group of lawyers specializing in financial and banking law, is a co-supervisor of groups specializing in mergers and acquisitions, real estate and construction, corporate law and corporate finance, debt and corporate financing (Eurobonds issuance, syndicated lending, structural financing, securitization, etc.).

# SEMINAR SPEAKERS



*Musienko, Svitlana*  
Partner and Head of Tax,  
DLA Piper  
(Ukraine)

Svitlana Musienko heads DLA Piper Tax practice in Ukraine. She advises on both domestic and international tax planning, corporate law and investment structuring. With more than 10 years of professional experience behind her, Svitlana is acknowledged as one of the most skilled tax lawyers in Ukraine. Before joining DLA Piper, she worked in Ernst & Young's Kyiv office as a senior manager of its tax and legal practice. Prior to that she was with Arthur Andersen.

Svitlana has a master's degree in the Legal Regulation of Economics from the Kyiv National University of Economics. She is an active member of the legal and tax committees of the EBA and the ACC in Ukraine.



*Gregoriou, Maria*  
Tax Lawyer,  
One Tax Chambers  
(Cyprus)

Maria Gregoriou is a Cypriot and UK qualified Barrister. She has broad expertise in corporate and legal matters of a fiscal nature and specialises primarily in international aspects of taxation, which include both corporate and private client matters. Based in Nicosia, the capital of Cyprus, Maria advises on legal issues which relate to the tax implications of cross border structuring and transactions, mergers and acquisitions, reconstructions, group refinancing and other intra-group restructuring. Maria is a regular speaker at international conferences and a member of the International Fiscal Association, Cyprus Branch. Maria Gregoriou is a holder of an LLB (with Honours) from Warwick University, a Barrister-at-law and Gray's Inn Scholar, a LLM Tax from University College London and a practicing member of the Cyprus Bar Association.



*Ioannides, Panos*  
Director, Meritservus  
(Cyprus)

Panos Ioannides has an undergraduate degree from Yale University where he double majored in Economics and Mathematics. Panos spent some years at Kaiser Associates in Washington DC and London, a global mid-size management consulting firm with an elite client base. He has worked in Meritservus since 2007 and has since acquired membership in the association of chartered certified accountants (ACCA). He is a director of the Group's Corporate, Trust and Structuring Services.



*Demetriades, Ioannis*  
FCCA TEP, Managing  
Director, Crowe Horwath  
(Cyprus)

Ioannis Demetriades is a Founder and Managing Director of accountancy firm now known as Horwath DSP Limited in Nicosia, Cyprus. He has an extensive experience and expertise in the field of accounting and international tax planning. Ioannis is a member of Association of Chartered Certified Accountants – UK, Society of Trust & Estate Practitioners – UK, Institute of Certified Public Accountants of Cyprus, as well as of UK's Institute of Management Consultants.



*Papalexandrou, Alecos*  
Tax Partner, Deloitte  
(Cyprus)

Alecos has 14 years of experience in the fields of national and international tax planning and tax compliance issues and 2 years of experience in the fields of corporate finance. He has been with Deloitte since 2003 having worked with another Big Four consulting firm from 1995 to 2000. He has been involved in a number of international corporate restructuring projects and has extensive experience in tax due diligence and international tax planning projects. Alecos provides tax advice across a range of industries, including oilfield services, shipping, real estate, financial services and banking. He is a member of the Institute of Chartered Accountants in England & Wales and holds degree in M.Sc. Economics & Finance of University of London.



*Ioannides, Demetris*  
Chairman and CEO,  
Meritservus,  
IFA Cyprus President

Demetris Ioannides started his career with Deloitte London; he set up and chaired Deloitte, Cyprus up until 2005. During his Deloitte tenure, he has received various leadership awards and has established an impressive, broad clientele that helped shape the current stature of Cyprus as a leading international financial, trust and shipping centre.

8:30 am Registration

9:00 am Welcome Address

9:15 am General Overview of the Ukrainian Tax Reform  
Impact on International Tax Matters :  
What's in it for Ukrainian Businesses

10:00 am Recent Developments in Cyprus Legislation

10:45 am Coffee/Tea

11:00 am Latest Trends and Upcoming  
Developments in Ukraine-Cyprus  
International Tax Relations

12:00 am The Legal Implications of Substance and Exchange  
of Information and its effects on the application of the  
Cyprus - Ukraine Double Tax Treaty

1:00 pm Lunch

2:00 pm Cyprus Investment Funds and Cyprus Trusts as Wealth  
Management Vehicles for Ukrainian Clients

3:00 pm Beneficial Ownership Concept under New Tax Code  
of Ukraine and Related Risks with Corporate Structuring,  
including within the Cyprus Jurisdiction

3:45 pm Tax Aspects of Mergers and Acquisitions, Involving  
Cyprus and Ukrainian Companies

4:15 pm Coffee/Tea

4:30 pm Novelties in Cyprus Financing Structuring

5:00 pm Hot Tax Planning Structures with Involvement  
of Ukrainian and Cyprus Jurisdictions: Case-studies

5:45 pm Legal and Tax Aspects of Companies' Migration  
From Cyprus to EU and Vice Versa

6:30 pm Closing

# SEMINAR REGISTRATION

## Registration Office

For inquiries regarding registration and accommodation, please contact :

Olena Pemyakova  
IFA Ukraine  
Tel.: +380 44 2200711  
Email: ifa@if-ukraine.org

Address:  
4B Ivana Franko St.  
Kyiv, 01034, Ukraine

## Registration

We invite you to register online at [ifa-ukraine.org/2011register](http://ifa-ukraine.org/2011register)

All registrations are open until November 24, 2011.

Upon registration form and payment, IFA Ukraine will send an email confirmation to the Participant.

Please complete one registration form per Participant (online registration). Should you require additional registration forms for completion via mail or fax, please contact IFA Ukraine's offices

## Registration Fee

Registration Fee for IFA members: Euro 100.  
Registration Fee for non-IFA members: Euro 150.

## Registration Inclusions

Seminar registration includes participation in all sessions, electronic access to all technical papers and all refreshments during seminar hours. Registration fees do not include travel, accommodation, hotel breakfasts or hotel incidentals.

## Confirmation

IFA Ukraine will carry out registration procedures and will then issue the official e-confirmation letters and invoices upon receipt of payment. No reservation will be confirmed in the absence of the appropriate payment.

## Payment Order

If you need invoice to proceed with the payment, please contact IFA Ukraine.

All charges related to payments by bank transfers must be covered by the Participants.

The name of the Participant's company must be clearly indicated on the bank transfer.

## Cancellation Policy and Refund

All cancellations must be submitted in writing to the IFA Ukraine and are subject to the following refunds:

Up to November 15, 2011: refund is granted in full amount except for handling fee of Euro 50.

After November 15, 2011: no refunds are granted.

# GENERAL INFORMATION

## Badges

A name badge will be provided to Participants with registration documents on site.

## Official Website

For detailed and updated Seminar information, we invite you to visit the IFA Ukraine website at [ifa-ukraine.org](http://ifa-ukraine.org)

## Official language

The Conference languages are Ukrainian and English. Sessions will be conducted in both Ukrainian and English. Simultaneous translation will be provided.

## Venue

All conference events will take place at Radisson SAS Blue Hotel, Radisson Blu Hotel Kyiv, 22–24 Yaroslaviv Val St, Kyiv, Ukraine.

## Sponsorship

If you are interested in sponsorship opportunities, please contact Oksana Borovska, IFA Ukraine ([ifa@if-ukraine.org](mailto:ifa@if-ukraine.org)).

# SPONSORS

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## INTERNATIONAL MEDIA PARTNER



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