



International
Fiscal
Association

November 16, 2017

Kyiv, Ukraine

IFA Ukraine Educating Seminar: BEPS Driven Changes in Specific Regimes: Latest Updates



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SEMINAR SPEAKERS



Khodakovsky, Pavlo

**Acting President,
IFA Ukraine**

Pavlo joined Arzinger as Tax Partner in 2009. Since then Arzinger Tax Practice significantly strengthened its position in the Ukrainian legal market and gained a reputation of a reliable tax advisor.

Prior to joining Arzinger, Pavlo Khodakovsky worked for one of the leading Ukrainian corporations - Ukrainian Financial Group, where he was responsible for legal support of various issues of corporate governance, asset management, securities, taxation, etc. Performing respective duties, Pavlo has taken the positions of Deputy Director of an asset management company and Head of the supervisory board of a corporate investment fund. Previously, he also headed the Department for International and Legal Activities, in the Office of the Ukrainian Parliament Commissioner for Human Rights (Ombudsman).

Pavlo has a Master's Degree in International Law from the Institute of International Relations (Kyiv National Taras Shevchenko University) and a Master's Degree in Foreign Policy from the Diplomatic Academy of Ukraine (Ministry of Foreign Affairs of Ukraine).



Musienko, Svitlana

**Of Counsel,
DLA Piper Ukraine LLC**

Svitlana Musienko is Of Counsel with the Kyiv office of DLA Piper, an international law firm. She advises on domestic and international tax planning, corporate law and investment structuring. Her clients' portfolio includes MNCs and major Ukrainian groups.

Svitlana has 20 years of professional experience in the field of tax and law, including 9 years of serving as a head of tax for Ukraine with DLA Piper running its Kyiv tax practice. 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, also in Kyiv. Svitlana's experience includes several of Ukraine's most significant corporate restructuring projects and a string of high-profile due diligence exercises. She has a distinguished track record handling M&A and transaction structuring for both Ukrainian and transnational companies, as well as post-acquisition restructuring and tax optimization.

Svitlana is continuously highly ranked by all leading international and Ukrainian legal directories - Chambers Global, EMEA Legal 500, World Tax, Tax Controversy Leaders by International Tax Review, Expert Guides, World Transfer Pricing, Ukrainian Law Firms. A Handbook for Foreign Clients - in the areas of tax, transfer pricing and tax controversies in Ukraine.



Malaya, Alena

**Tax and Legal Advisor,
Eurofast**

Alena has started working right after graduating high school with honour in 2006. While working as a junior lawyer, she was getting a Bachelor's degree in Law, what she got with honour in 2010. In 2013 she obtained her Master's degree in corporate law from the Kiev V. Hetman National Economic University. In 2015 she graduated Ukrainian private school "ProBusiness school" and obtained her Project Management certificate.

To this time, she has gathered a wide experience, while working for both local and international companies. Among her engagements were international tax structuring, highly marginal investment projects, Forex licensing within the EU, residency & citizenship, foreign company incorporation and administration. She successfully supported a client claiming his funds from a bank under liquidation, complicated by a fact that the client's company, i.e. account holder, was strike-off from the register. Alena actively contributes to professional publications on tax issues.



Siiushov, Denys

**Associate,
Arzinger**

Denys is a tax associate at Arzinger Law Office. He specializes in advising domestic and foreign clients on a broad range of legal issues related to the application of Ukrainian and foreign tax laws.

Denys is experienced in restructuring of companies and building effective from the tax perspective international holding and trading structures which include tax optimization in Ukraine and use of tax incentives in other states. He has repeatedly advised on the protection of assets and companies' owners by utilizing such common law instruments as creation of trusts and use of nominal owners taking into account the latest trends in exchange of tax and banking information.

Currently Denys is working on his Ph.D. thesis in Commercial Law on the subject of economic and legal aspects of granting tax incentives to stimulate business activities in Ukraine.

Denys Siiushov has a Master's degree (with honors) in Law from the National University "Odesa Law Academy" with focus in Civil and Economic Law. He is fluent in Ukrainian, Russian and English.



Damianou, Chris

**Executive Director,
Eurofast**

Chris is a Director of International Tax and Executive Director at Eurofast and he specializes in international tax structuring and planning, including real estate structuring. Chris has over 25 years of working experience in tax consulting, working with local as well as multinational companies. Previously in his career he has served as the European Chairman of the 5th largest international accounting association in the world for Europe, Middle East and Africa (EMEA) Region as well as President of the Junior Chamber International of Cyprus. He is also a member of a number of international trade associations and a Board Member of some house-hold name companies. Chris is the Honorary Consul of the Republic of Montenegro in Cyprus.

Chris is a holder of a Bachelor's Degree in Business Administration from Southern Illinois University and a US CPA. He has extensive general experience in the countries of South East Europe and CIS, as well as specific cross-border structuring, joint ventures and M&A experience involving most of the countries in the region. He is a regular speaker in international tax conferences and events, and he is the author of numerous taxation articles published in international press and magazines. He has also conducted over 200 presentations on International Tax Planning, Accounting and Management Consulting in conferences and meetings all over the world.



Bakulina, Alina

**Partner, Head of Transfer Pricing Group,
EBS**

Alina has a vast experience in the area of transfer pricing, companies restructuring and international consultancy. Alina has experience in consulting on Ukrainian, Russian and international tax matters, transfer pricing, tax planning, tax due diligence.

Since the end of 2014 Alina is Head of Transfer Pricing Group of EBS. Her responsibilities include coordination of the complete process of preparation of Transfer pricing documentation, as well as consulting on transfer pricing matters, on international tax matters and on Ukrainian currency regulation matters.

Alina also takes part in projects on providing advice on international taxation and Ukrainian currency regulation. Alina speaks fluent English and German.

SEMINAR SPEAKERS



Sinitsyn, Iegor

**Senior Tax Advisor,
EBS**

Iegor is a tax auditor and advisor on tax issues, accounting and management reporting. Iegor has more than five years of experience in Ukrainian and international taxation, he has provided tax audits and due diligences for over 50 clients including pharmaceutical, FMCG, IT, agricultural companies.

He specializes in provision of tax audits, due diligences, transfer pricing documentation and reports, tax advices.

Iegor holds a Master Degree in accounting and audit (University of banking of the National Bank of Ukraine) and is a Certified Accounting Practitioner (CAP).

ORGANISER'S INFORMATION

IFA Ukraine

IFA Ukraine is a non-profit organization with legal personality established in Kyiv in 2007 and official recognition obtained at the 61st IFA Kyoto Congress, September 2007.

At the moment, IFA Ukraine stands for above 30 members - tax managers, consultants, government officials, participating both directly and indirectly in the activities of Central IFA.

IFA Ukraine achieves its objectives through contributing to IFA Annual Congresses, as well as through the provision of variety of educational opportunities for its Members, including regular international tax seminars for tax consultants and in-house tax specialists, lectures for students and young scholars, knowledge seminars for state authorities, and workshops for judges. IFA Ukraine has also been engaged in projects with IBFD and OECD.

www.ifa-ukraine.org

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 116 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

Thursday, November 16, 2017

09:00 – 11:30

Welcome Address

- Preventing Artificial Avoidance of PE Status: how will it work in Ukraine in a view of BEPS initiatives?
- Preferred IP Regimes for Ukrainian Business: an overview
- Implementation of Tax on Derived Capital and Its Compatibility with the Existing Double Tax Treaties

Panelists:

Chris Damianou, Alena Malaya, *Eurofast*

Alina Bakulina, Iegor Sinitsyn, *EBS*

11:30 – 11:45

Networking Coffee Break

11:45 – 13:00

- Recent Developments in Ukrainian Transfer Pricing Legislation
- TP Reporting for MNCs in Ukraine: expected changes

Panelists:

Svitlana Musienko, *DLA Piper Ukraine LLC*

Denys Siiushov, *Arzinger*