



Dear friends and colleagues,

International Tax Associates B.V.

With the support of the International Fiscal Association (Russian Branch) Russian-European Center for Tax and Legal Cooperation, law firms Baker & McKenzie, Linklaters, Herbert Smith, Goltsblat BLP, Nektorov, Saveliev & Partners organizes an International Tax Conference on April 5th, 2012 in Moscow and invites you to attend this top level forum on international tax, led by Professor Kees van Raad (the Netherlands)

Location: Marriott Grand Hotel, Tverskaya 26/1, Moscow

Registration at 9.00

Time of the conference: 9.30 – 18.00

Russian and international taxation: new case law, challenges and solutions

9:00-9:30 *Registration*

9:30-11:30 *Session 1: Thin Capitalization cases: New approach of Russian courts and taxpayers' defeat in cases Severny Kuzbass, Naryanmarneftegas*

Solutions for taxpayers with similar structures.

Moderator: Victor Matchekhin, Linklaters

Speakers:

Review of cases Severny Kuzbass and Naryanmarneftegas

Evgeny Timofeev, Partner, Goltsblat BLP

European viewpoint on decisions of Russian courts in cases Severny Kuzbass and Naryanmarneftegas

Kees van Raad, Professor, Leiden University

Could there be another outcome in case Severny Kuzbass? Possible alternative arguments of a taxpayer.

Evgeny Smirnov, Senior Associate, Herbert Smith

Could there be another outcome in case Naryanmarneftegas? Possible alternative arguments of a taxpayer.

Sergey Zhestkov, Partner, Baker & McKenzie

Panel discussion

11:30-12.00 *Coffee break*

12.00-14.00

Session 2: Tax developments: view of tax directors

Moderator: Roustam Vakhitov, International Tax Associates

Speakers

Victor Alexandrov, Head of tax support for restructuring & business development, OAO “Lukoil”, Russia

Gennadiy Sandyrev, Head of the Group of Companies “Taxes and Law”

Vladimir Belobragin, Head of Tax Planning Department, OAO “Aeroflot”

Panel discussion

14.00-15.00 Lunch

15.00-16.30 Session 3: Cooperation with trust service providers in the light of recent developments. Steps to undertake for successful continuation of operations.

Charles Savva, Savva & Associates, Cyprus

Alain Goebel, Arendt & Medernach, Luxembourg

Niels Roovers, Roovers Advocatuur, the Netherlands

16:30-17:00 *Coffee break*

17:00-18:00 Session 4. Master Class: Your financing structure is being audited by tax authorities. How not to repeat mistakes of Severny Kuzbass and Naryanmarneftegas?

Moderator: Egor Batanov, Partner at Nektorov, Saveliev & Partners

Participation fee is 400 euros (excl. VAT). For registration issues please contact **Mr. Ilya Vaguine** at vaguine@intertaxlaw.org



Herbert Smith

Linklaters

