



**June 13th 2008
Radisson SAS
Kyiv, Ukraine**

IFA Ukraine is pleased to invite you to the **1st Annual IFA Ukraine International Tax Conference**, designed to address topical international tax issues within and beyond the scope of Ukrainian practice landscape.

Conference will focus on key issues and in-depth coverage of the latest developments in the field of international tax regulations and practice in Ukraine. Case studies will be used to illustrate practical application of tax treaties, laws and regulations, as well as to highlight practical issues and opportunities in tax structuring of cross-border transactions.

The 2008 Conference Agenda will include panels dedicated to: **Current International Tax Issues in Ukraine, Cross-Border M&A Transactions, Raising Financing in International Markets, and Structuring Foreign Investments into Ukrainian Real Estate.**

The conference is targeted on meeting professional expectations of a wide range of practitioners, professionals, and in-house international tax personnel dealing with cross-border M&A, investment, project finance, IPOs, securitization, and real estate transactions.

1st Annual IFA Ukraine International Tax Conference

This event is presented with the support of:

Sponsors

Deloitte.

ERNST & YOUNG
Quality In Everything We Do

GLN
Gide Lagrette Bouel

Magisters
Tax and

KONNOV & SOZANOVSKY
ATTORNEYS AT LAW

PRICEWATERHOUSECOOPERS

ДК-УКРАЇНА
Аудиторів і Консультантів

NEXFA
INTERNATIONAL

business ukraïne

Realestate

ГОРІАЗЕТА

ПРАВДІВІ

БІСНІС

Media partners

General Media Partner

ІНВЕСТ
разера

General News Media Partner

interfax

General Analytical Media Partner

ЕКСПЕРТ

Partners:

1st Annual IFA Ukraine International Tax Conference

Dear Colleagues:

IFA Ukraine is a newly established organization representing International Fiscal Association - the only non-governmental and non-sectoral international organization dealing with fiscal matters and providing a unique forum for discussing international fiscal questions over the globe.

IFA Ukraine's main goals are aimed at improvement and development of a coherent international taxation system in Ukraine designed to harmonize and eliminate distortions arising from the interaction of Ukraine's tax system with tax systems of other countries.

The 1st Annual IFA Ukraine International Tax Conference is designed to target this objective via creating an effective forum for international tax professionals, scholars, state officials and representatives of businesses in Ukraine.

We would like to extend special gratitude to sponsors and media partners for their generous support of this Conference.

We do hope you will be willing to take advantage of this exceptional opportunity and get a better notion of challenges within Ukrainian international tax practice, as well as awareness of opportunities allowing to compete effectively in modern tax and business realities.

Sincerely,
Oleh Marchenko
IFA Ukraine President



Panel 1

8:30 AM–9 AM

Registration/Continental Breakfast

9 AM–9:10 AM

Opening remarks

Oleh Marchenko, IFA President

9:10 AM–11 AM

**Current International
Tax Issues in Ukraine**

Panel leader

Oleg Chayka, KPMG

This panel will explore the following topics:

- Regulation of transfer pricing in Ukraine
 - Group Taxation: International Practice and Prospects in Ukraine
 - Tax regime for Ukrainian holding companies: obstacles for businesses expansion abroad
 - Intellectual property in international tax planning
-

Speakers:

- Paul Cooper, PricewaterhouseCoopers
- Oleg Chayka, KPMG
- Volodymyr Didenko, Magisters
- Yulia Logunova, Ernst & Young

11 AM–11:15 AM

Coffee-break

1st Annual IFA Ukraine International Tax Conference

Panel 2

11:15 AM–12:45 PM

**Cross-Border
M&A Transactions
in Ukraine**

Panel leader

Iryna Marushko, Lavrynovych & Partners

This panel will explore the following topics:

- Financing M&A transactions: debt push-down strategies and interest deductibility restrictions
 - Dutch and Cypriot holdings in structuring cross-border M&A transactions
 - Alternative holding structures: Hungary
 - Taxation of corporate reorganizations in Ukraine
-

Speakers:

- Igor Chufarov, Ernst & Young
- Oleksandr Strukov, DLA Piper
- Alisa Dubrova, Gide Loyrette Nouel
- Iryna Marushko, Lavrynovych & Partners

1 PM–2 PM

Networking Lunch



Panel 3

2 PM–3:45 PM

Raising Financing in International Markets

Panel leader

Anna Zorya, Magisters

Speakers:

- Sergiy Popov, KPMG
- Anna Zorya, Magisters
- Ilya Soykis, Deloitte

This panel will explore the following topics:

- Pre-IPO structuring
- Beneficial ownership and other issues in structuring cross-border debt financing
- Tax structuring of cross-border securitization transactions

3:45 PM–4 PM

Coffee-break

1st Annual IFA Ukraine International Tax Conference

Panel 4

4 PM–5:45 PM

Foreign Investments into Ukrainian Real Estate

Panel leader

Oleh Marchenko, Magisters

Speakers:

- Yevgeniya Derbal, Konnov & Sozanovsky
- Oleh Marchenko, Magisters
- Brian Mulholland, Deloitte
- Svitlana Bilyk, PricewaterhouseCoopers

This panel will explore the following topics:

- Use of domestic investment funds in structuring inbound investments into Ukrainian *residential* development projects
- *Case study* – acquisition of Ukrainian commercial real estate through a Dutch holding, post-acquisition restructuring
- Structuring international investment into Ukrainian real estate
- *Commercial* real estate development projects

6:45 PM–9 PM

Dnieper River Boat Trip



General Information

| | |
|---|--|
| Venue: | Radisson SAS Hotel 22 Yaroslaviv Val Str. Kyiv 01034 Ukraine |
| Register Online at: | www.ifa-ukraine.org |
| Or return the registration form to | ifa@ifa-ukraine.org tel. +380 44 492 82 82, fax. +380 44 492 82 72 Oksana Borovska, IFA Ukraine Coordinator |
| Fees: | IFA Ukraine Member 200 USD Non-Member 300 USD |
| Method of payment: | After receipt of completed registration form, the registrant will be invoiced accordingly |
| Fees include: | Attendance to all sessions Conference materials and speakers' papers to be sent in advance Breakfast, luncheon and coffee-breaks Dnieper River Boat Trip |
| Cancellations: | All cancellations must be received in writing before June 6 2008 at the: ifa@ifa-ukraine.org or by fax. +380 44 492 82 72 Oksana Borovska, IFA Ukraine Coordinator. Refunds will be granted less a 50 USD administrative fee. We regret that no refunds will be made after June 6 2008. Registration is transferable. Substitutes are welcome. |



1st Annual IFA Ukraine International Tax Conference

Registration Form

Please read the "General Information" section before completing this form and return it to IFA Ukraine at the address below:

Personal details

Name _____

Name for your badge (if different from above) _____

IFA Membership number (if applicable) _____

Firm/Company/Organization: _____

Address: _____ City / Zip Code: _____

Phone: _____ Fax: _____ E-Mail: _____

Please check business affiliation: Law Firm Industry Education Government Other

Registration fees

IFA Ukraine Member — 200 USD

Non-Member — 300 USD

Payment details

To be billed please send us correctly completed application form. Might you have additional questions as to the payment please contact our offices at the below contact details.

Signature: _____ Date: _____

Please send the completed form to:

ifa@if-ukraine.org or by fax +380 44 492 82 72

Oksana Borovska, IFA Ukraine Coordinator

