



Permanent Establishment Seminar

Thursday
26 November 2009
9AM – 1PM

PricewaterhouseCoopers
Office, 75 Zhylyanska St.

9AM	Welcome Note	<ul style="list-style-type: none"> Oleh Marchenko, IFA Ukraine President, Moderator
9:15AM	Is There a Permanent Establishment?	<ul style="list-style-type: none"> Agency Permanent Establishment Substance Requirements in International Structuring and Associated PE Exposures Preparatory or Auxiliary Character Exception Svetlana Bilyk, PricewaterhouseCoopers Slava Vlasov, PricewaterhouseCoopers Anna Yakubenko, Chadbourne and Parke
10:45AM – 11AM	Coffee-Break	
11AM	Taxation of Permanent Establishment	<ul style="list-style-type: none"> VAT and Customs Implications of a PE Attribution of Profit to a PE: Is There a Pony There? <i>(on the issue of inclusion of head office financing into taxable income)</i> Igor Dankov, PricewaterhouseCoopers Anna Zoria, Magisters
12PM – 12:15PM	Coffee-Break	
12:15AM	PE Disputes	<ul style="list-style-type: none"> The Role of Non-Discrimination Principle in Taxation of Permanent Establishments PE Issues: Recent Ukrainian and International Court Practices Sergiy Melnyk, Salans Illya Sverdlov, DLA Piper
1:15PM	Closing Remarks	

IFA Ukraine

+380 44 492 8282
ifa@if-ukraine.org

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