

# 1<sup>st</sup> International IFA Czech Branch Transfer Pricing Conference



Venue: Likesova auditorium, University of Economics, Prague, W. Churchill Sq. 1938/4, Prague 3  
Date: 16 October 2018

## Agenda

- 9:00 – 9:30 **Opening speeches**
- 9:30 – 10:00 **Digitalization of business models and TP: the new frontier of business restructurings** Raffaele Petruzzi, WU Transfer Pricing Center
- 10:00 – 10:30 **Continuing losses and their relationship with pre – and post – restructuring** Lenka Lopatová, Moore Stephens
- 10:30 – 11:00 
- 11:00 – 11:15 **Award presentation to the winners of the 1st year contest for diploma theses on tax-related subjects announced by the Chamber of Tax Advisors of the Czech Republic**
- 11:15 – 11:45 Topic will be specified  
Silvia Hallová, Grant Thornton
- 11:45 – 12:15 **TP financial transactions** Andrea Lee, Erste Bank
- 12:15 – 12:45 **TP and digital transformation** Stefaan de Baets, PwC Belgium
- 12:45 – 13:00 **The importance of data in the post-BEPS era**  
Nikita Bogdanov, Bureau van Dijk
- 13:00 – 14:00 
- 14:00 – 14:30 **Simplification vs. complexity: Is it time for safe harbours arm's length range?**  
Danuše Nerudová and Veronika Solilová; Mendel University in Brno
- 14:30 – 15:00 **Experience with bilateral APA and MAP in Slovakia**  
Renáta Bláhová, BMB Leitner, Slovakia
- 15:00 – 15:30 **Cost sharing/Cost contribution arrangements**  
Matěj Vacík, Doosan Bobcat
- 15:30 – 15:45 **Role of royalty rates in the valuation of intangibles**  
Ednaldo Silva, RoyaltyStat
- 15:45 – 16:15 
- 16:15 – 16:45 **Shades of grey in the manufacturing continuum: Is there a cutting edge?**  
Igor Wotke, Garrett
- 16:45 – 17:15 **TP documentation and its importance for tax control in the Czech Republic and abroad**  
Vítězslav Kapoun, General financial directorate of the Czech Republic
- 17:15 – 17:45 **Practical experience of a CFO at a MNE in the field of TP**  
Gabriela Hrachovinová, IFA Czech republic and Czech Chamber of Tax Advisers
- Closing remarks**