



Intellectual Property: the Luxembourg dimension

13 October, Moscow

Embassy of the Grand-Duchy of Luxembourg in Moscow

Khrouchtchevsky Pereoulok 3

Speakers:

Alina Macovei-Grençon, Partner, PwC (Luxembourg)

Oxana Yarocshuk, Senior Manager, PwC (Luxembourg)

Veronica Misuitina, Partner, PwC (Russia)

Svetlana Stroykova, Director, PwC (Russia)

- 9:00– 9:30** **Registration and coffee**
- 9:30–9:50** **Introduction**
Sasha Baillie, Consul, the Grand Duchy of Luxembourg to Russia
Veronica Misuitina, Partner, PwC (Russia)
- 9:50–10:20** **Luxembourg IP tax regime**
- Current structures
 - Issues faced
- Veronica Misuitina*, Partner, PwC (Russia)
- 10:20–11:20** **Luxembourg IP tax regime**
- Why to consider an IP holding company in Luxembourg?
 - Luxembourg IP regime
 - Conditions to fulfill in order to benefit from the regime
 - Comparison with others European models
 - Other non-tax benefits
 - VAT
- Alina Macovei-Grençon*, Partner, PwC (Luxembourg)
- 11:20–11:40** **Coffee break**
- 11:40–12:30** Other aspects of IP structures
1. Transfer Pricing
 - Basic principles of transfer pricing
 - Why transfer pricing considerations will be critical?

Svetlana Stroykova, Director, PwC (Russia)
 2. Valuation
 - Why value IP?
 - Valuation methods
 - Case studies

Alina Macovei-Grençon, Partner, PwC (Luxembourg)
 3. Other relevant aspects
 - What is IP under the Luxembourg law?
 - Qualifying assets Industrial property, Literary and Artistic property)
 - Patentability of software

Alina Macovei-Grençon, Partner, PwC (Luxembourg)
- 12:30–13:00** **Questions & Answers session**
- 13:00–13:10** **Conclusion of the conference:**
Sasha Baillie, Consul, the Grand Duchy of Luxembourg to Russia
Veronica Misuitina, Partner, PwC (Russia)
- 13:10–14:10** **Reception:** walking buffet kindly offered by the Luxembourg Embassy.



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Our speakers:



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Alexandre is member of the Belgian Tax and Accounting Expert Institute and is also member of various Chambers of Commerce focused on CEE and CIS countries. Alexandre has over 12 years of experience in International Tax Advisory and has gained since more than 7 years a strong expertise of CEE and CIS markets.

Alexandre is currently Tax Partner in the Real Estate Group of PricewaterhouseCoopers Luxembourg where is in charge of a large portfolio of international Real Estate Groups. The "geographical" responsibilities of Alexandre within PricewaterhouseCoopers Luxembourg are mainly focused on the CEE/CIS markets.



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Alina is tax partner in the ITS-US group within PricewaterhouseCoopers Luxembourg Tax Group. She joined PricewaterhouseCoopers Luxembourg in 2002, after previously working in Belgium and Romania, equally advising in international and local tax.

She works mainly with US groups on the structuring of the holding and/or financing activities of the group as well as intellectual property tax planning and is frequently leading her Firm in discussions of structures with the Luxembourg tax administration.

She equally has experience in working for private equity funds, in structuring the acquisitions and disposal strategies. Alina is leading the intellectual property Key Focus Area within PricewaterhouseCoopers Luxembourg. Alina holds an LL.M in International Taxation from the International Tax College, Universities Leuven and Leiden and a law degree from the Law University of Bucharest.



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Veronica is a partner responsible for international tax planning practice in PwC Moscow.

She joined the Moscow office of PricewaterhouseCoopers in 1992 and began advising major Russian and foreign clients in various industries on cross-border taxation. Veronica has participated in a number of successful projects for Russian industrial groups and has significant expertise in the development of tax-efficient holding, management and operating structures for multi-industry clients.

Veronica Misiutina graduated from the International Economic Relations Institute of the Russian State Finance Academy. She is also a UK-certified chartered accountant (ACCA).



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Our speakers:



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Oxana Yaroschuk is a Senior Tax Manager. She joined PricewaterhouseCoopers Moscow in 1998. In Moscow Oxana worked for the Financial Services group, where she specializes in taxation of banks, securities broker/dealers and investment funds. Oxana has a wide range of experience in advising on tax issues related to capital market transactions as well as in international and local tax strategies for Russian and international companies. In October 2008 Oxana joined PwC Luxembourg Alternative Investment Group where she works for M&A and Hedge Funds/Investment Management Practice.



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Svetlana Stroykova is a Director of the International Tax Services and Transfer Pricing group in PwC Moscow. She has been working for PricewaterhouseCoopers since 1993. Svetlana graduated from the Moscow State University of Foreign Affairs (MGIMO), department of International Economic Relations, major in economics, diploma with honors. In 1998 successfully passed CPA exams.

Svetlana has served a wide range of clients in the following industries: automotive industry, food & beverage, consumer packaged goods companies, pharmaceutical companies, global energy and mining companies and other industrial production goods. From 2001 to 2008 she headed a number of large projects, consulting our clients on transfer pricing and international structuring.

Svetlana consulted Russian governmental authorities on international pricing principles.