



INFLUENCE OF US TAX LAW ON THE POLISH ENTITIES

RECENT CHANGES IN US TAX LAW

DLA PIPER INTERNATIONAL TAX CONFERENCE

Date: 20 April 2010, Time: 2p.m.

Place: InterContinental Hotel, Emilii Plater 49, Warsaw

DLA Piper would like to invite you to the **INTERNATIONAL TAX CONFERENCE**, during which we will present the most crucial issues influencing subsidiaries of US entities operating in Poland. We will focus in particular on transfer pricing issues and reporting obligations.

Polish subsidiaries of US entities are obliged not only to comply with Polish tax regulations but also US law. Although such entities may operate in Poland only, their relationship to US entities and their transactions with US entities result in certain obligations under the US tax law. Failure to meet all such obligations may result in severe penalties for both the Polish subsidiary and the US parent. This is particularly valid in the view of the most recent Obama reforms that extend the obligations imposed on non-US entities.

The conference aims at presenting the most crucial obligations of the Polish entities as well as risks and opportunities resulting from the US, local Polish and EU transfer pricing perspective.

To confirm your attendance, please contact:

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PROGRAM

14:00 REGISTRATION

14:15 OPENING

Krzysztof Wiater, Marcin Matyka

14:30 CONSEQUENCES OF OBAMA REFORMS

- General overview of US tax system with emphasis on its impact on US-related foreign subs
- Implications of Obama reforms on foreign subs of US parents
- Reporting obligations of foreign subs (particularly FIN 48)

Michael S. Lebovitz

16:00 COFFEE BREAK

16:15 TRANSFER PRICING

- Influence of US transfer pricing regulations on Polish entities
- US and Polish transfer pricing documentation
- Recent developments within the EU transfer pricing practice

Bernhard von Thaden, Agata Uceda, Monika Poteraj

After the conference we kindly invite you for **DLA PIPER COCKTAIL RECEPTION**

17:30 – Plus One Bar, InterContinental Hotel

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OUR SPEAKERS:



Michael S. Lebovitz

Partner

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Michael concentrates on international business and tax planning. He has advised on the tax aspects of international joint ventures, cross-border mergers and acquisitions, post-transaction integration, international corporate finance, capital market transactions and general international tax planning matters.



Bernhard von Thaden

Principal Economist

Co-Head, Transfer Pricing Practice

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Bernhard focuses in international transfer pricing and business and intangible valuation for publicly traded and private multinationals in a wide variety of sectors. He has strong experience managing global transfer pricing and valuation projects covering all types of transactions.



Agata Uceda

EMEA Transfer Pricing Director

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Agata has extensive experience in all aspects of transfer pricing planning, dispute resolution and compliance and has managed many assignments covering economic, management and fiscal aspects of transfer pricing.



Marcin Matyka

Partner

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Marcin specialises in implementing strategic and comprehensive solutions to tax issues – thus enabling optimisation of their economic processes and giving business added value. He is also experienced in implementing and coordinating projects that require combined tax and legal advisory support and participation of other firms.



Monika Poteraj

Director

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Monika specialises in the corporate taxation (including transfer pricing) as well as VAT issues. She is an author of numerous tax publications, including a commentary on the EU VI Directive. Monika assists companies from the pharmaceutical, automotive, hotel and energy sector.



Szymon Murawski

Senior Associate

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Szymon specialises in international tax law and issues related to corporate income tax and personal income tax. His experience includes structuring transactions connected with domestic and international investments. Szymon advises on tax structuring, as well as on issues related to private equity, venture capital and investment funds as well mergers & acquisitions.

DLA Piper Wiatery sp.k. is part of DLA Piper, an international legal practice, the members of which are separate and distinct legal entities.

For further information, please refer to www.dlapiper.com

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