

*Program- April 23*

*ITL- Morning Sessions*

<b>Time</b>	<b>Topic</b>	<b>Presenter</b>
<b>9:30-9:40 presentation</b>	Contradiction of CFC rules and tax treaties mainly article 7	Makhabbat
<b>9:40-9:50 discussion</b>	Business profits	
<b>9:50-10:00 presentation</b>	Interaction of domestic law and treaty law	Tolkyn
<b>10:00- 10:10 discussion</b>		
<b>10:10-10:20 presentation</b>	Abuse of Tax Law - Instruments available today and ideas for the future	Elvira
<b>10:20-10:30 discussion</b>		
<b>10:30- 10:40 presentation</b>	International Tax implications of Islamic finance instruments	Togzhan
<b>10:40-10:50 discussion</b>		
<b>10:50- 11:00 Break</b>		
<b>11:00- 11:10 presentation</b>	Taxpayers rights under international conventions on human rights	Elbegi
<b>11:10-11:20 discussion</b>		
<b>11:20- 11:30 presentation</b>	Key issues in interpretation of tax treaties in Kazakhstan including analysis of court cases	Olga
<b>11:30- 11:40 discussion</b>		
<b>11:40-11:50 presentation</b>	Tax implications of cross-border transactions in Custom Union	Salidat
<b>11:50- 12:00 discussion</b>		
<b>12:00-12:10 presentation</b>	Electronic commerce: impact on cross-border business activities	Gulchekhra
<b>12:10- 12:20 discussion</b>		
<b>12:20-12:30 presentation</b>	Special economic zones as a tool of economic development -	Nursultan
<b>12:30-12:40 discussion</b>	International Tax Considerations	

## *MNEs- Afternoon Sessions*

<b>Time</b>	<b>Topic</b>	<b>Presenter</b>
<b>17:00-17:10 presentation</b>	Company shareholder taxation	Maria
<b>17:10-17:20 discussion</b>		
<b>17:20- 17:30 presentation</b>	Transactions involving transfer pricing issues	Zarina
<b>17:30-17:40 discussion</b>		
<b>17:40-17:50 presentation</b>	Tax implications of corporate finance	Madina
<b>17:50-18:00 discussion</b>		
<b>18:00- 18:15 Break</b>		
<b>18:15- 18:25 presentation</b>	Mergers and Acquisitions: Tax implications	Olga
<b>18:25- 18:35 discussion</b>		
<b>18:35- 18:45 presentation</b>	Taxation of oil and gas companies	Nursultan
<b>18:45-18:55 discussion</b>		
<b>18:55- 19:05 presentation</b>	Use of offshore trusts	Assel
<b>19:05- 19:15 discussion</b>		