

**tax webinar  
27th September  
2022  
3-5 pm (CEST)**



## Permanent establishment – is it still a topic in consideration of tax risk?

The panelists will provide an overview of the current situation concerning permanent establishment. We'll try to get conclusions on:

- remote working culture – are the tax departments to blame for restraining new normality?
- attribution of profits to PE – is everything clear?
- why PE is not controlled company for tax purposes?

### INVITING:

Prof. dr hab. Dominik J. Gajewski – head of CASP SGH

dr Monika Laskowska – member of CASP SGH

Registration by: 25 September 2022, 11:00 (CET)

Contact: [mlaskow1@sgh.waw.pl](mailto:mlaskow1@sgh.waw.pl)

Registration>>>check website: [www.casp.sgh.waw.pl](http://www.casp.sgh.waw.pl)

Participation in the event is free

We encourage all interested in the event to save the dates and register right away. You may also feel free to invite your colleagues or other persons passionate about international taxation or PE in particular.

# INVITED PANELISTS



**Ms. Gabriela Capristano Cardoso | analyst in the Transfer Pricing Unit at the OECD, Center for Tax Policy and Administration (CTPA)**

Prior to joining the OECD, she has worked for the United Nations, and acquired experience in both academia and the private sector.

Gabriela is a certified Lawyer in Brazil and has an Advanced LL.M. in International Tax from Leiden University, the Netherlands. She is also currently a PhD candidate in transfer pricing at the Vienna University of Economics and Business, Austria



**Ms. Patrycja Brzostowska | Tax Director at Gorillas Technologies Group |**

Specialist in international taxation and transfer pricing with more than 10 years' experience. In her role she manages projects related to e-commerce and intellectual property. She oversees the group tax compliance and manages tax audit defense. Before that she worked 10 years at Zalando as Senior Lead of International Tax and TP Team.



**Ms. Maja Kowalewska | Deputy Director, Income Tax Department, Ministry of Finance, Poland**

Master of Law (University of Gdańsk) and Master in Finance and Accounting (Warsaw School of Economics), nowadays PhD student (Warsaw School of Economics). The Ministry of Finance of Poland employee of many years as head of unit in VAT Department, deputy director in Transfer Pricing Department and now deputy director in Income Taxes Department. Seconded National Expert to the European Commission in Luxembourg. Participant, also as a plenipotentiary, in preliminary proceedings before the Court of Justice of the European Union in Luxembourg. Poland's delegate to the Council of the UE, the EC and OECD working groups.



**Mr. Stefaan De Baets | Senior Counsel in the transfer pricing | international tax team of PwC Belgium |**

Since 1 January 2016, where he is responsible for avoiding and settlement of transfer pricing controversy, further development of the transfer pricing market, promoting the key presence of PwC on that market as well as delivering contributions to the development of transfer pricing policies. From 1 April 2011 to 31 December 2015, he was a transfer pricing advisor at the OECD in Paris, France. Until he joined the OECD, Stefaan worked for the Federal Public Service of Finances in Belgium, mostly on transfer pricing and international tax, for more than twenty years. He was a delegate for Belgium to OECD Working Party 6 (transfer pricing) from March 1996 to March 2011 and to the Joint Transfer Pricing Forum from March 2003 to March 2011. Stefaan is a guest lecturer on international taxation at the University of Lausanne (Switzerland) and the Catholic University of Leuven (Belgium). Regular guest speaker or panelist at international tax events.



**Mr. Bartłomiej Cedro | Regional Tax Counsel Central & South Eastern Europe at Nestlé |**

Polish tax advisor, MSc in Economics, tax professional with over 20 years of mixed experience in Big Four consulting & international industry environment. Regional Tax Counsel Central & South Eastern Europe at Nestlé, responsible for overall supervision of tax issues in the region as well as tax business partnering vs. local functions focused on international tax aspects.



**Mr. Krzysztof Łukosz | Associate Partner, Ernst & Young Belastingadviseurs LLP**

Associate Partner in the Dutch Transfer Pricing & Operating Model Effectiveness practice of EY. In this role, he focuses on intra-group financial transactions and treasury operations. He has more than 15 years of experience in assisting multinational clients on advance pricing agreements, TP controversy and dispute resolution, intra-group financing structures, TP planning, benchmarking, and documentation. Speaks at various seminars and conferences, is a frequent contributor to international journals in the field of transfer pricing. He has worked with a number of clients from various industries. Krzysztof earned his master's degrees from the Vrije Universiteit Amsterdam - in mathematics, and from the Jagiellonian University - in financial mathematics.

## MODERATOR



**Ms. Monika Laskowska | member of the Centre for Analysis and Studies of Taxation (CASP) at the Warsaw School of Economics (SGH)**

Holds the PhD title in public policy from Warsaw School of Economics. She is a chartered tax advisor with over 20-year experience in international taxation, in particular transfer pricing. In 2019, she was awarded with LMG Europe Women in Business Law Awards as the best expert in transfer pricing matters in Europe. Trustfully served as Competent Authority for the Ministry of Finance in Poland in scope of all double taxation matters. She was a delegate to the OECD, Working Party 6 (Transfer Pricing) in Paris and the European Union Joint Transfer Pricing Forum in Brussels. She was tax partner in one of Big4 consulting firms.

Long time guest lecturer in SGH, speaker in the international tax conferences and author of many reviewed publications. Member of IFA.

## COUNTRY REPORTER



**Mr. Wojciech Niedźwiedzki | member of the Centre for Analysis and Studies of Taxation (CASP) at the Warsaw School of Economics (SGH)**

Attorney-at-law, certified tax advisor. Specializes in legal and tax advice related to international taxation, including transfer pricing, withholding tax and reporting of tax arrangements. Experienced in tax planning, securing cross-border payments and tax inspections and proceedings.