



The International Fiscal Association, the Slovak Republic Branch

IFA Slovakia regional CONFERENCE: Tax litigation and its international context

Grant Thornton Consulting, Hodžovo nám. 1/A, Bratislava

10 April 2025 9:00 – 13:00

AGENDA:

9:00 – 9:30 Refreshments and Registration

9:30 – 10:45 **Tax litigation and its international context**

JUDr. Pavol Naď, President of the Supreme Administrative Court of the Slovak Republic

Ing. Bruno Patúš, Vice-President of the Financial Administration, Tax Directorate of the Slovak Republic

Prof. Michael Lang, President of IFA Austria, Head of WU Institute for International Tax Law in Vienna

Prof. JUDr. Marián Giba, PhD., Head of the Department of Constitutional Law, Faculty of Law, Comenius University

Ing. Renáta Bláhová, FCCA, LL.M., President IFA SR, Partner BMB Partners TAXAND

- Topic 1: More than 70 years of ECJ disputes, including changes after 2004
- Topic 2: Three years of activity of the Supreme Administrative Court in Slovakia
- Topic 3: EU Law from constitutional perspective, including tax disputes
- Topic 4: Efficiency of tax litigation from the perspective of the MoF, Financial Administration and taxpayers

11:00 – 12:30 **Model transfer pricing cases from the perspective of an advisor, Financial Administration and a judge**

- Panel 1: Selection of comparable entities and rejection of loss-making companies
- Panel 2: Median or range, case law and arbitration within the EU
- Panel 3: Tax Reliability Index – examples from practice

12:30 – 13:00 **Buffet lunch and informal discussion of participants**

Further speakers and guests in alphabetical order:

Ing. František Cséfalvay, MoF SR, Department of International Tax Relations

Ing. Silvia Hallová, LL.M., DipIFR, Partner Grant Thornton Consulting, member of the Executive Committee of the Slovak Chamber of Tax Advisers

JUDr. Ing. Matej Kačaljak, PhD., attorney at law, 2016 – 2024 Head of the Department of Financial Law, Comenius University

Ing. Silvia Karelová, Head of the Department of International Taxation Methodology, Tax Directorate of the Slovak Republic

Ing. Judita Kuchtová, tax advisor, Partner BMB Partners TAXAND

JUDr. Juraj Vališ, judge of the Supreme Administrative Court of the Slovak Republic

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Deutsch-Slowakische
Industrie- und Handelskammer
Slovensko-nemecká
obchodná a priemyselná komora



SLOVENSKO – RAKÚSKA OBCHODNÁ KOMORA
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