

Tax controversy & dispute resolution

Central and Eastern Europe

Our commitment

Our goal is to be your first choice for professional services to support your business, operational and technology needs, from strategy to execution.

Our focus is on understanding your priorities, anticipating your challenges, and enabling your teams with the functional and industry tools they need to achieve continued success.

Why us?

We are an organised network of over 180 professionals located in all Central and Eastern Europe, who specialise in the area of tax controversy and dispute resolution (TCDR) services. Our aim is to help you prevent, efficiently manage, and favourably resolve tax audits and tax litigations.

Our experience

Team with local and international reputation

Our specialists in TCDR matters are **ranked as top players and excellent practitioners** by the ranking agencies such as Legal 500 and Chambers Global. Our practices and specialists are in top listed firms/attorneys, positioning in the rankings of the international directories (in Romania, Dan Dascălu is listed in Band 1 by both Chambers Global and Legal 500).

Local knowledge and strong relationships with government officials

The successful management and resolution of audits and controversies relies heavily on **having strong relationships** with revenue authorities, and a **thorough understanding** of local processes and procedures. Our network includes individuals who are members of local specialist groups, as well as former high-ranking government tax officials who have substantial experience working on audits and disputes, both from a client and revenue-authority perspective.

Deep technical subject matter expertise

Revenue authorities are now engaged in enforcement activities across the entire tax spectrum, including direct and indirect tax, as well as other related areas. As a result, **organisations should ensure that they have the support of technical specialists in the tax area in which the audit or dispute is focused.**

Our services

Wide variety of services

We can provide our clients with **truly complex solutions**. Our experts can accompany our clients at every stage of the proceedings, from the initial scoping analysis, to detailed work and reporting to the final tribunal hearing and post hearing briefs.

Our experts come from a **variety of backgrounds** including accounting, finance, law, tax, transactions and project management.

Industry expertise

We have experts in all industries

PwC professionals have **knowledge and expertise in a wide variety of industries**, as well as the intricacies of business customs and traditions around the world. A great depth of expertise in **all key industries** including but not limited to: Automotive, Construction & Real estate, Energy, utilities & mining, Financial services, Media, Pharmaceuticals, Intellectual Property, Telecommunications, Retail & Consumer or Technology.

Global network with local presence

Global reach and perspective

Our Tax Controversy and Dispute Resolution professionals are located in territories which are regarded as aggressive tax enforcement jurisdictions, or are considered to be of key strategic importance from a tax perspective. This means we **can provide you with the appropriate support to help you resolve your tax audit or dispute**, wherever you need it. We can offer this support on a unilateral, bilateral, or multilateral basis, depending on your needs.

How can we help you?

Our experience

We have a wide variety of technical subject matter and expertise in disputes

<i>TCDR technical areas of coverage:</i>	<i>TCDR strengths results from unique combination of expertise in:</i>	<i>Our litigation expertise covers assistance in:</i>
<ul style="list-style-type: none">• Transfer pricing (TP)• Indirect tax and customs (ITX)• International tax services (ITS)• European Courts of Justice (ECJ)• Arbitration Convention• European Court of Human Rights (ECHR)• National tax law and local taxes• High net worth individuals (HNWI)• Employment taxes• GAAR and tax fraud• State Aid• White collar	<ul style="list-style-type: none">• Tax Law• Employment Law• Accounting• Economics• Business management• Industry specialisation	<ul style="list-style-type: none">• National Courts of Law• Procedures under the Arbitration Convention and Double Tax Treaties• International tax services (ITS)• European Courts of Justice (ECJ)• European Court of Human Rights (ECHR)

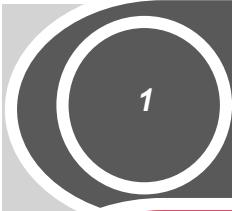


How can we help you?

Our services

Our Tax Controversy and Dispute Resolution network can help you gain a better understanding of your company's risks and exposures and manage your tax disputes, audits and examinations worldwide.

Our services are delivered in five key areas:



1

Tax dispute prevention techniques

We can help you develop sound policies and processes that can provide defensible models before a tax audit or dispute begins.



2

Tax audit management practices

We can help you employ efficient audit management techniques once an examination or tax audit begins.



3

Tax dispute resolution alternatives

We can work with you, at both the local and international level, to implement practices that can reduce or eliminate prolonged and costly disputes.



4

Global strategic planning of tax audits and disputes

We can help you develop TCDR strategies that are consistent with your goals, while supporting you with tax dispute resolution alternatives (once a controversy arises).



5

Tax risk management, analysis and disclosure

We can analyse various tax positions that may require financial statement disclosures, and help you develop sound policies and practices, including appropriate documentation and disclosure approaches.



6

Litigation

We can help you with legal representation in the general and administrative courts. The cases in which we were involved are remarkable due to their intricacy, international character and interpretation of the European Union law by the European Court of Justice and the European Court of Human Rights.

How can we help you?

Industry experience

As we are organised in industry-focused networks this allow us to provide tailored services reflecting the specific needs of the industry.

Our industry-focused network is designed to anticipate and address your business needs.

Our staff cover...



Automotive



Industrial manufacturing



Energy



Healthcare



Aerospace & defence



Technology



Retail and consumer



Agriculture



Government/
public services



Insurance



Pharmaceuticals & life sciences



Infrastructure



Real Estate



Mining



Utilities

How can we help you?

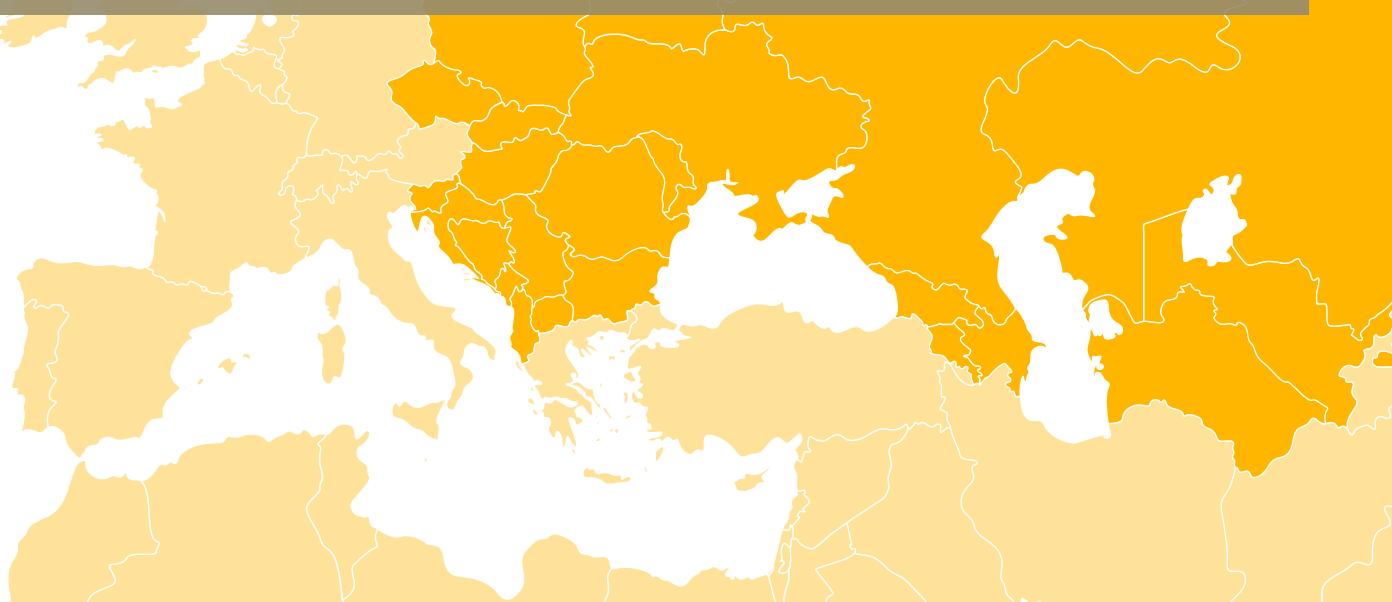
Global Network with local presence

We are a fully integrated network of **professionals in Central and Eastern Europe territories**, working across our network to share knowledge, experience and solutions to develop fresh perspectives and practical advice that can answer complex local and international perspectives on your issues always ensuring a high standard of quality.

Our presence within the CEE region:

>180 professionals in
30 territories

Albania	Czech Republic	Lithuania	Serbia
Armenia	Estonia	Macedonia	Slovenia
Azerbaijan	Georgia	Moldova	Slovak Republic
Belarus	Hungary	Mongolia	Tajikistan
Bosnia & Herzegovina	Kazakhstan	Montenegro	Turkmenistan
Bulgaria	Kosovo	Poland	Ukraine
Croatia	Kyrgyzstan	Romania	Uzbekistan
	Latvia	Russia	



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PwC helps organisations and individuals create the value they're looking for. We're a network of firms in 158 countries with more than 260,000 people who are committed to delivering quality in assurance, tax and advisory services. Tell us what matters to you and find out more by visiting us at www.pwc.com