



The International Fiscal Association, the Slovak Republic Branch

10th IFA Slovakia Regional Conference: Update on International Tax Challenges

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

22 April 2026 9:00 – 13:00

AGENDA

9:00 – 9:30 Refreshments and Registration

9:30 Opening Remarks

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

Ing. Bruno Patúš, Vice-President Financial Administration, Financial Directorate SR

JUDr. Marián Trenčan, Vice-President Supreme Administrative Court SR

9.45 – 10:00 **Double Tax Treaty Override after 2025 Changes in Slovak Constitution**

Doc. JUDr. Ing. Matej Kačaljak, PhD., Vice-President IFA SR, attorney at law, 2016 – 2024 Head of Department of Financial Law, Faculty of Law, Comenius University

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

10.00 – 11:00 **Implementation of GMT (Pillar 2): Global, EU and Domestic Challenges**

Ing. Judita Kuchtová, Board Member IFA SR, Partner BMB Partners TAXAND

Mgr. Ing. Petr Němec, Partner Grant Thornton Czech Republic

Ing. Jana Herková, Head of International Tax Relations, Ministry of Finance SR

11:15 – 12:30 **Tax Residency of Legal Entities**

- General Report Summary (IFA 2025 Lisbon Congress) and example scenarios
- Amending Article 4(3) of OECD MC
- Outlook

Prof. Dr. Joao Félix Pinto Nogueira, Vice-President IFA Portugal, General Reporter IFA 2025 Lisbon Congress

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

12:30 – 13:00 **Buffet Lunch and Informal Discussion of Participants**

Speakers and guests in alphabetical order:

Ing. Ľubica Adame, PhD., LL.M., Director of the Direct Taxes Department, Ministry of Finance SR

Ing. František Cséfalvay, Department for International Tax Relations, Ministry of Finance SR

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

Ing. Jana Herková, Head of International Tax Relations, Ministry of Finance SR

Ing. Silvia Karelová, Head of the Department for International Taxation Methodology, Financial Directorate SR

Ing. Judita Kuchtová, Board Member IFA SR, Partner BMB Partners TAXAND

JUDr. Juraj Vališ, Judge, Supreme Administrative Court SR

Further experts from:

Ministry of Finance the Slovak Republic

Financial Directorate of the Slovak Republic

IFA Europe / Slovakia / Czech Republic / Austria

Application closing date: 10 April 2026

Languages: Slovak, English (simultaneous interpretation)



AHK

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