



### **Ionela Florescu**

#### **Tax Director**

ionela.florescu@dlapiper.com

#### **Bucharest**

T: +40 372 155 800

F: +40 372 155 810

Ionela Florescu is a Certified Tax Adviser and a VAT and tax litigation lawyer. She has almost 11 years of experience in both Romanian and international taxation, focusing on VAT, individual taxation, clawback and corporate income tax issues during the last 4 years.

Ionela has been involved in complex VAT projects such as analysis and optimization of business structures from a tax perspective, chain transactions, assistance and representation of key clients in front of tax authorities during tax inspection and tax litigation processes, as well as tax reviews and VAT compliance. The clients assisted by her act mainly in pharmaceutical, logistics and transportation, real estate, industrial products and insurance sectors.

### **LANGUAGES SPOKEN**

- English
- Romanian

- Tax

- Life Sciences
- Insurance
- Real Estate

English Romanian

- Assisting an important international insurance company during a tax litigation process with the Romanian Fiscal Authority in relation to administrative acts issued by the tax authorities through which they imposed the client an additional obligation of around EUR 1.5 million, representing VAT and related accessories; After litigation case assisting the client in assessing the amounts to be recovered and additional late payment interests to which the client was entitled
- Assisting several companies in assisting the potential fixed establishment risk they might have in Romania given the operations performed on Romania's territory; Performing analysis of the activity of the companies in light of the Romanian and European VAT legislation
- Assisting a major pharmaceutical company with respect to refund of clawback contribution, being in charge with the entire procedural aspects in this respect, including collaboration with tax authorities
- Providing an assessment of the permanent establishment risk and employment tax implications triggered by a business structure envisaged to be implemented in Romania by a global insurance company and preparing the tax clauses to be included in the

employment agreement envisaged to be concluded by the company

- Assisting companies operating in FMCG sector with respect to the proper implementation of the restrictive legislation applicable for their activity, drafting and properly amending commercial policies in order to comply with the applicable law while preserving tax rights/deductions
- Assisting several companies in the process of change of the business model; Reviewing business model and providing tax efficient solutions tailored to the Group policies/requirements

## CREDENTIALS

---

### Prior Experience

Previously, Ionela worked for PricewaterhouseCoopers in Romania, within the Indirect Tax team, where she co-ordinated the VAT compliance group, handling this for more than 40 international clients.

### Education

- Academy of Economic Studies, Bucharest, Economy/Accounting, BA, 2006

### Memberships

- Romanian Chamber of Tax Consultants
- AmCham Taxation Committee and VAT working group

## INSIGHTS

---

### Publications

#### Recent update on the Romanian Taxpayer List applicable as of 2022

13 October 2021

The Romanian tax authorities published the draft requirements regarding the updated large taxpayer list, to be applied starting with 1 January 2022.

---

#### The opportunity to optimise Romanian tax liabilities

6 October 2021

A tax amnesty is still in place in Romania, and taxpayers may benefit of it by 31 January 2022, under certain conditions to be fulfilled at the date of submitting the annulment request.

---