

PERSONAL INFORMATION

ELENA
NESHOVSKA KJOSEVA
6.7.1986 Skopje, Macedonia
Female
Macedonian
Work: bul. Goce Delchev, 9b, 1000 Skopje Home: bul. Vasko Karangeleski, 1/1, 1000 Skopje
0038970688557
e.neshovska@pf.ukim.edu.mk

WORK EXPERIENCE

September 2022 - present ASSOCIATE PROFESSOR

Ss. Cyril and Methodius University

Faculty of Law "Justinianus Primus" in Skopje

Department of Financial law

Goce Delchev 9b, Skopje, North Macedonia

December 2017 – September 2022

Assistant Professor

Ss. Cyril and Methodius University

Faculty of Law "lustinianus Primus" in Skopje

Department of Financial law

Goce Delchev 9b, Skopje, North Macedonia

EDUCATION

April 2015 PhD IN LAW

Ss. Cyril and Methodius University

Faculty of Law "lustinianus Primus" in Skopje Goce Delchev 9b, Skopje, North Macedonia

Topic of doctorate dissertation: "Tax Treatment of Cross-border

Activities According the Double Tax Treaties"

December 2011 - March 2015 Doctoral Studies in Financial Law

Ss. Cyril and Methodius University

Faculty of Law "lustinianus Primus" in Skopje Goce Delchev 9b, Skopje, North Macedonia

average grade 10 (taken from 6 to 10)

major subjects: Methodology, Tax Law, International Tax Law,

Budget Law, Tax Procedure

September 2010 LLM in Financial law

Ss. Cyril and Methodius University

Faculty of Law "Justinianus Primus" in Skopje Goce Delchev 9b, Skopje, North Macedonia

Topic: "Tax progression versus flat tax"

September 2008 – March 2010

Master studies of Finance and Financial Law

Ss. Cyril and Methodius University

Faculty of Law "Justinianus Primus" in Skopje Goce Delchev 9b, Skopje, North Macedonia

average grade 10 (taken from 6 to 10)

major subjects: Tax Law, International Tax Law, Custom Law,

Budget Law. Local Finances

June 2008

Bachelor of Law

Ss. Cyril and Methodius University

Faculty of Law "lustinianus Primus" in Skopje Goce Delchev 9b, Skopje, North Macedonia

average grade 9, 73 (taken from 6 to 10)

ADDITIONAL INFORMATION

February 2023 - present Head of the Career and Alumni Center at the Law faculty Iustinianus Primus in Skopje (kariera.pf.ukim.edu.mk)

September 2020 - present

Reviewer at the Journal *Eastern European Economics*

PARTICIPATION IN SOME MAJOR **PROJECTS**

Ongoing

Mega Project "Euro integration of Social, Legal and Political System in the Republic of North Macedonia", implemented by the Faculty of Law "lustinianus Primus" in Skopje

Employed as an Expert from the Academia for Chapter 16: Taxation

12.7.2024 – **15.12.2024** Project title: IC 00383-2024 Proposing new fiscal policy instruments that enhance the achievements of the NDS/SDG goals in up to two NDS strategic areas – Sustainable, Innovative and Competitive Economy and Green Transformation, implemented by UNDP

Employed as National Consultant

April - June 2024 "Law students and Young Lawyers-Key Agents for Change for Advancing Human Right and Rule of Law", implemented by the Macedonian Young Lawyers Association (MYLA) and The state of the Netherlands

> Employed as a Project Coordinator at the Career and Alumni Center at the Law Faculty Iustinianus Primus in Skopje

April 2022 – December 31 st 2023	"Improving of Working Conditions", EU Financed Project, implemented by Archidata s.r.l. and its consortium partners
	Employed as a Senior Non-Key Expert – Legal Expert for Tax and Social Contributions
30.11.2022 - 31.01.2023	"Law students and Young Lawyers-Key Agents for Change for Advancing Human Right and Rule of Law", implemented by the Macedonian Young Lawyers Association (MYLA) and The state of the Netherlands
	Employed as a Researcher for baseline report on the
	shortcomings and gaps within the existing regulations and study programs concerning practical legal skills and legal ethics
January – March 2020	"Tax Procedure and Legal Remedies for Protection of Taxpayers` Rights with Special Accent on the Legal Persons", implemented by the NGO Epicentar as part of the USAID financed project "Improvement of business environment in Macedonia"
	Employed as a Legal expert for Taxes and Tax Procedure
March – December 2018	"Analysis and Evaluation of Tax Procedures Changes in the Republic of Macedonia" – Scientific Project of the Ss. Cyril and Methodius University
	Employed as a Legal expert
January – March 2017	"Competitiveness in Southeast Europe: A Policy Outlook 2018", Chapter: Macedonia, implemented by the OECD
	Employed as an Independent expert from the academia

MAJOR PUBLICATIONS IN THE LAST 5 YEARS

- 1. Maksimovska Stojkova, Zafiroski & Neshovska Kjoseva, *Financial Law*, **University book**, Publisher: Faculty of Law lustinianus Primus Skopje, ISBN 978-608 4655-95-4, Skopje, 2024
- 2. Aleksandra Maksimovska Stojkova and Elena Neshovska Kjoseva, *Crypto Assets: Tax Law and Policy in North Macedonia*, **Chapter 29 in Crypto Assets: Tax Law and Policy**, WU Institute for Austrian and International Tax Law, European and International Tax Law and Policy Series, Volume 30, ISBN 978-90-8722-911-5, Publisher: IBFD, Amsterdam, 2024 (https://doi.org/10.59403/3rmbnkh)
- 3. Neshovska Kjoseva, Elena, *Relationship between Bilateral Treaties on Elimination of Double Taxation on Income and Capital and Domestic Tax Law and the EU Law, Annual* of the Law faculty lustinianus Primus in honor of professor Shkarikj, Publisher: Law faculty lustinianus Primus, ISSN 0583—5062, Vol.62, p.195-205, 2024
- 4. Aleksandra Maksimovska Stojkova and Elena Neshovska Kjoseva, "Computation of Taxable Business Profits: Book-Tax Conformity and other issues", Chapter 21: NORTH MACEDONIA (p.527-549), EATPL International Tax Series, Vol.22, Publisher: IBFD, Amsterdam, ISBN978-90-8722-822-8, 2024
- 5. Aleksandra Maksimovska Stojkova and Elena Neshovska Kjoseva, *The Impact of Tax Treaties on International Mobility of Work in the Republic of North Macedonia*, **Chapter 22 in Mobility of Work**, WU Institute for Austrian and International Tax Law, European and International Tax Law and Policy Series, Volume 29, Publisher: IBFD, Amsterdam, ISBN 978-90-8722-904-7, 2024
- 6. Aleksandra Maksimovska Stojkova and Elena Neshovska Kjoseva, *Macedonian Tax Legislation Coping with the EU Integration: Reforming Processes*, lustinianus Primus Law Review, Special Issue Vol.15, No.1, Publisher: Faculty of law lustinianus Primus in Skopje, 2024, available at: https://journals.ukim.mk/index.php/iplr/article/view/2585/2155- (indexed in EBSCO and HEINONLINE)
- 3. Aleksandra Maksimovska Stojkova and Elena Neshovska Kjoseva, Assessment of the Situation in Republic of North Macedonia in Chapter 16: Reforms Implemented in the Field of Direct Taxation Since the Submission of the Application for EU Membership Until Today and Results, Proceedings of Scientific Conference organized by the MANU, Ministry of Finance and the

- 4. Zafiroski, J., Kjoseva, E.N. (2024). *Taxing the Big Tech in the European Union*. **Chapter in: Pellat, G., Zafiroski, J., Šuplata, M. (eds) Cooperation and Enlargement: Two Challenges to be Addressed in the European Projects—2022**. Studies in Systems, Decision and Control, vol 500. Springer, Cham. https://doi.org/10.1007/978-3-031-42253-9_11 (indexed in Scopus and SCImago)
- 5. Neshovska Kjoseva, Elena, Towards the Idea for Introduction of Alternative Mechanisms for Tax Disputes Resolution, Annual of the Law faculty lustinianus Primus in honor of Professor Janevski, Publisher: Law faculty lustinianus Primus, ISSN 0583-5062, pp.721-740, 2023
- 6. Neshovska Kjoseva, Elena, *Taxes and the Rise of New Work Arrangements*, Proceedings of the XI Scientific Conference "Law Between Creation and Interpretation" (ISBN 978-99938-57-68-6) organized by the University of East Sarajevo, Faculty of Law, ISBN 978-99938-57-76-1, pp.342-356, 2023
- 7. Aleksandra Maksimovska Stojkova and Elena Neshovska Kjoseva, *Mandatory Disclosure Rules in North Macedonia,* **Chapter 25** in **Mandatory Disclosure Rules**, WU Institute for Austrian and International Tax Law, European and International Tax Law and Policy Series, Vol.26, ISBN 978-90-8722-811-8, Publisher: IBFD, Amsterdam, 2023
- 8. Neshovska Kjoseva, Elena, *Tax and Legal Aspects of the Idea for Introducing a System of Simplified Work Engagement of Seasonal, Temporary and Occasional Workers in Certain Activities*, Proceedings of the Annual Conference of the Association for Labour and Social Law, pp. 177-194, 2023
- 9. Osmani, Afrim & Neshovska Kjoseva, Elena, *Baseline Report for the purposes of the Project "Law students and Young Lawyers-Key Agents for Change for Advancing Human Right and Rule of Law"*, Publisher: Macedonian Young Lawyers Association (MYLA), 2023
- 10. Neshovska Kjoseva, Elena, *The Concept of Tax Culture in Contemporary Times*, Vol. 13, No. 3 (2022): IUSTINIANUS PRIMUS LAW REVIEW Special issue Conference proceedings, available at: https://journals.ukim.mk/index.php/iplr/article/view/1865

(indexed in EBSCO and HEINONLINE)

11. Neshovska Kjoseva, Elena, *The Anti-Tax Avoidance Directive as a Mean to Tackle Harmful Tax Practices in the European Union - Legal and Tax Analysis of Its Rules*, lustinianus Primus Law Review, Vol.13, Issue 1, Year 2022, Publisher: Law Faculty Iustinianus Primus Skopje, 2022, available at:

http://lawreview.pf.ukim.edu.mk/) - (indexed in EBSCO and HEINONLINE)

- 12. Neshovska Kjoseva, Elena, Combating Tax Evasion and Tax Avoidance by Exchanging of Tax Information Macedonian Experience on the Path to the EU Integration —Collection of papers of the X Scientific Conference "Contradictions of the contemporary law", Vol.3 (ISBN 978-99938-57-67-9) organized by the University of East Sarajevo, Faculty of Law, pp. 382-394, 2022
- 13. Neshovska Kjoseva, Elena, *Taxation in Era of Globalization and Digitalization- Issues and Challenges on National Tax Sovereignty,* Iustinianus Primus Law Review, Special Issue Year 2021, Publisher: Faculty of Law "Iustinianus Primus"- Skopje, (indexed in EBSCO and HEINONLINE)
- 14. Pendovska, Maksimovska Stojkova, Zafiroski & Neshovska Kjoseva, *Tax Law*, **University book**, Publisher: Faculty of Law Iustinianus Primus Skopje, ISBN 978-608-4655-87-9, pp.394, Skopje, 2021
- 15. Pendovska, Vesna, Neshovska Kjoseva, Elena, *Tax Policy Measures for Dealing with the Consequences of the Covid-19 Crisis: The Case of Republic of North Macedonia*, Essays in Honor of Professor Emeritus Dejan Popovic, Liber Amicorum, University of Belgrade, Faculty of Law, Belgrade, pp.299-313, 2021
- 16. Neshovska Kjoseva, Elena, State's Right to Tax in the Light of the European Convention on Human Rights: Case of EUROMAK METAL DOO v. Republic of Macedonia and Its Impact on the Macedonian Tax Law, Iustinianus Primus Law Review, Volume 11 Special Issue Year 2020, Publisher: Faculty of Law "Iustinianus Primus" Skopje, 2020 (indexed in EBSCO and HEINONLINE)
- 17. Zafiroski, Neshovska Kjoseva, *Tax competition in the Western Balkans an open door tax policy for reaching of desired economic goals is it enough?*, **Chapter 2** (pp. 37-55), **Scientific monograph "Suvremeni izazovi EU, Republike Hrvatske i zemalja Zapadnoga Balkana Contemporary Challenges of the EU, the Republic of Croatia and the Western Balkan Countries"** (research project "Investment in Research and Development and Competitiveness of the Republic of Croatia and the Western Balkan Countries (ZP UNIRI 4/19)", Publisher: University of Economics, Rijeka, Croatia, ISBN –978-953-7813-60-4, 2020
- 18. Pendovska, Maksimovska Stojkova, Zafiroski and Neshovska Kjoseva, *Tax Procedure and Protection of Taxpayers*` *Rights with Special Emphasis on Legal Entities,* Publisher: USAID & Epicentar, 2020

- 19. Pendovska, Maksimovska Stojkova, Zafiroski and Neshovska Kjoseva, Evaluation of Tax Procedural Solutions with Special Accent on Protection of Taxpayers` Rights in Republic of North Macedonia: Conditions, Problems and Solutions, Publisher: Law Faculty Iustinianus Primus Skopje, ISBN 978 608 213 013-2, COBISS.MK ID 51972101, Skopje, 2020
- 20. Neshovska Kjoseva, Elena, *The Future of the International and Macedonian Tax Law: Facing the Challenges after Implementation of the OECD BEPS Inclusive Framework,* Proceedings of the 7th International Scientific Conference "Ohrid School of Law", organized by the Institute for Legal-Economic Research and Education "Iuridica Prima" 11-12, ISBN 978-608-66152-7-7, COBISS.MK-ID 52807173, p.221-240, 2020 (indexed in EBSCO);
- 21. Neshovska Kjoseva, Elena, *The OECD Multilateral Instrument: New Momentum in the International Tax Law and Its Impact on the Macedonian Tax Law,* Iustinianus Primus Law Review, Vol.11, Issue 1, Year 2020, Publisher: Law Faculty Iustinianus Primus Skopje, 2020 (indexed in EBSCO and HEINONLINE);
- 22. Neshovska Kjoseva, Elena, Euromak Metal DOO v. FYROM: Principle of fair taxation, Analysis on Domestic and International Court Practice, Publisher: Center for Legal Researches and Analysis, Skopje, 2020, pp.77-81 (Legal analysis on the Judgment of the European Court of Human Rights in the Case of Euromak Metal Doo V. Republic of Macedonia, available at: https://justiceobservers.org/article/66801/63647/187), 2018
- 23. Maksimovska Stojkova & Neshovska Kjoseva, Legal Transplants in Taxation: Benefits and Handicaps, Proceedings of the 2019 Annual International Conference, "Transitions of Legal Systems: 30 Years after the fall of the Berlin Wall, Publisher: Faculty of Law "lustinianus Primus"- Skopje, 2019 (indexed in EBSCO and HEINONLINE)
- 24. Pendovska, Maksimovska Stojkova & Neshovska Kjoseva, Main Characteristics of the 2019 Tax Reform in the Republic of North Macedonia, Proceedings of the 5th International Scientific Conference "Ohrid School of Law", organized by the Institute for Legal-Economic Research and Education "Iuridica Prima" Vol.9, ISBN 978-608-66152-4-6, pp.71-85, 2019 (indexed in EBSCO)
- 25. Maksimovska Stojkova, Neshovska Kjoseva & Stojmenovska, *Balkan Candidate Countries Running for Fiscal Consolidation: Legal Frameworks vs. Economic Results,* Comparative Economic Research. Central and Eastern Europe, Vol.22, No.3, 2019, Publisher: University of Lodz, Poland

(indexed in Scopus)

CONFERENCES IN THE LAST 5 YEARS

- "Challenges of Legal Systems", Annual International Scientific Conference 2024, organized by the Law Faculty Iustinianus Primus in Skopje, held on November 8, 2024 (participated and presented by paper entitled "Gender Perspective on Taxation");
- Panel Discussion 'New Fiscal Instruments for Achieving SDGs and NDGs', organized by the UNDP North Macedonia, held in Skopje on 29.10.2024 (participated as moderator and panelist);
- Panel Discussion 'New Fiscal Instruments for Achieving SDGs and NDGs', organized by the UNDP North Macedonia, held in Skopje on 3.10.2024 (participated as moderator and panelist);
- 4. **Panel Discussion** "Students' Rights and Obligations", organized by the NGO Coalition All for Fair Trials, held online on 23rd of July 2024 (participated as panelist);
- 5. **2023** Annual International Conference, "The Prospects of the European Integration in the Time of Geopolitical Challenges" organized by the Faculty of law "lustinianus Primus" Skopje, held in Skopje, on 3.11.2023 (participated and presented by paper entitled "Macedonian Tax Legislation Coping with the EU Integration: Reforming Processes" as a coauthor with prof.A.Maksimovska Stojkova)
- "RUST2023 Crypto Assets: Tax Law and Policy", organized by the Institute for Austrian and International Tax Law, Vienna University of Economics and Business, held in Rust, Austria, 29.6-1.7.2023 (participation with paper presentation as a national report with A.Maksimovska Stojkova)
- 7. **Scientific Conference organized by the MANU**, Ministry of Finance and the SEP, Skopje, 22.6.2023 (participation with paper presentation as a coauthor with prof.A.Maksimovska Stojkova entitled "Assessment of the Situation in Republic of North Macedonia in Chapter 16: Reforms Implemented in the Field of Direct Taxation Since the Submission of the Application for EU Membership Until Today and Results")

- 8. Law in the digital age, international online conference for junior scholars, organized by the Department of Business Law, Faculty of Economic and Social Sciences of the Budapest University of Technology and Economics, 22.6.2023 (participation with paper presentation entitled "Crypto Assets: Tax Treatment and Tax Policy Issues in North Macedonia")
- EATLP Congress 2023, held in University of Luxembourg, 8-10
 June 2023 (participation with paper presentation as a coauthor
 with prof.A.Maksimovska Stojkova entitled "Computation of
 Taxable Business Profits: Book-Tax Conformity and other
 issues: NORTH MACEDONIA")
- 10. Annual Conference of the Association for Labour and Social Law, held in Ohrid, May 31st June 1st 2023 (participation with paper presentation entitled "Tax and Legal Aspects of the Idea for Introducing a System of Simplified Work Engagement of Seasonal, Temporary and Occasional Workers in Certain Activities")
- 11. Tax evasion: Financial and Legal Aspects and Challenges for the Law, 27.4.2023, organized by the ELSA North Macedonia, Skopje (participated as lecturer)
- 12. XI Scientific Conference "Law Between Creation and Interpretation" organized by the University of East Sarajevo, Faculty of Law, held in Pale, on 5.11.2022 (participated and presented by paper entitled "Taxes and the Rise of New Work Arrangements")
- 13. 2022 Annual International Conference, "Contemporary Aspects of Legal Culture Contents and Discontents" organized by the Faculty of law "lustinianus Primus" Skopje, held in Skopje, on 4.11.2022 (participated and presented by paper entitled "The Concept of Tax Culture in Contemporary Times")
- 14. "28th Conference ERECO-PGV: Cooperation and Enlargement: Two challenges to be addressed in the European project", organized by the Faculty of law "lustinianus Primus" Skopje and the European Research Comunity, held in Ohrid, 22-24.9.2022, (participated with plenary presentation of paper on the topic "Taxing the Big Tech in the European Union", as a coauthor with Prof. Jovan Zafiroski)
- 15. "RUST2022 Mobility of Work", organized by the Institute for Austrian and International Tax Law, Vienna University of Economics and Business, held in Rust, Austria from 7-9.7.2022

- (participated and presented by paper as national reporters with prof. d-r Aleksandra Maksimovska Stojkova)
- 16. **5th Itinerant Summer University in the Balkans**, "Crisis of the Rule of Law in the Balkans and the EU", organized by the Université Paris Nanterre, Universität Münster & the Faculty of Law Iustinianus Primus Skopje, held in Skopje, 5- 6.5.2022 (participated with plenary presentation on the topic ,,A Way Out of Crisis Through Fiscal Councils in the Balkans and the European Union, with Prof. A.Maksimovska Stojkova)
- 17. 7th Regional Meeting on BEPS for Eurasian Countries, organized by Macedonian Ministry of Finance, OECD and Intra-European Organization of Tax Administration, 18.11.2021 (participation with presentation on the topic "Country-by-country report: Issues and Challenges for Republic of North Macedonia)
- 18. **2021 Annual International Conference**, "Law, Socio-Economic and Politics in Troubled Times", organized by the Faculty of Law Iustinianus Primus Skopje, held in Skopje, 5.11.2021 (participated and presented by paper)
- 19. "Contradictions of the contemporary law" organized by the University of East Sarajevo, Faculty of Law, held in Pale, on 30.10.2021 (participated and presented by paper)
- 20. "RUST2021 Mandatory Disclosure Rules", organized by the Institute for Austrian and International Tax Law, Vienna University of Economics and Business, held online on 3.7.2021 (participated and presented by paper as national reporters with prof. d-r Aleksandra Maksimovska Stojkova)
- 21. International Taxation and the Law of Republic of North Macedonia, organized by ELSA North Macedonia, 11.5.2021 & 13.5.2021, Skopje (participated as lecturer)
- 22. **2020 Annual International Conference**, "70 years of the European Convention of Human Rights", organized by the Faculty of Law Iustinianus Primus Skopje, held in Skopje, 6.11.2020 (participated and presented by paper)
- 23. 7th International Scientific Conference Ohrid School Of Law 2020, The Future of Law: Facing the Challenges of COVID 19, organized by the Institute for Legal-Economic Research and Education "Iuridica Prima", (participated and presented by paper)
- 24. **2019 Annual International Conference**, "Transitions of Legal

- Systems: 30 Years after the fall of the Berlin Wall, organized by the Faculty of Law Iustinianus Primus Skopje, held in Skopje, 8-9.11.2019 (participated and presented by paper)
- 25. *5th Skopsko Zagrebski Colloquium*, in organization of the Faculty of Law Iustinianus Primus Skopje, held in Skopje on 13.9.2019 (participated and presented by paper)
- 26. 5th Shadow Economy Conference: Tax Evasion and Economic Inequity, organized by the Department of Economics and Management, University of Trento, held in Trento on July 11-13, 2019 (participated and presented by paper)
- 27. 5th International Scientific Conference Ohrid School of Law:
 Abuse of the Law and "Abnormal" Law versus Rule of Law",
 organized by the Institute for Legal-Economic Research and
 Education "Iuridica Prima", held in Ohrid on May 9-12 2019
 (participated and presented by paper)