



## Western Region Chapter International Fiscal Association – India Branch

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### IFA India-WRC Conference

#### "International Taxation & Transfer Pricing - Evolving Landscape"

June 28<sup>TH</sup> & 29<sup>TH</sup>, 2013, Hotel Taj President, Mumbai

Lot of developments are taking place constantly in the areas of international taxation and transfer pricing in India by way of legislative amendments and significant number of judicial pronouncements with wide applicability and far reaching impact. This requires in depth understanding of the evolving scenario and constant updation with the changes which has become an uphill task particularly in view of the voluminous nature of various judgments/rulings as well as various developments taking place in the international arena. All this requires to understand and analyse the evolving landscape of international taxation and transfer pricing in India.

With the key theme of the Conference being, '**International Taxation & Transfer Pricing - Evolving Landscape**', IFA India-WRC will deliver a strategic conference which shall focus on key components that cover international taxation and transfer pricing and will be of great interest to Tax Professionals, Tax Directors, CFO's, Revenue Officials & Revenue Authorities.

The topics to be deliberated at the Conference have been carefully selected based on the recent developments which are likely to have far reaching implications, namely:

- ✓ Application of Tax Treaties to New Business Models arising from the Internet
- ✓ Developments in respect of concept of 'Beneficial Ownership'
- ✓ Developments and Issues relating to Indirect transfers
- ✓ Transfer Pricing (TP)
- ✓ Recent Developments in International Taxation – OECD & UN Reports etc.

### Who should attend and why?

Eminent speakers from India & abroad, senior tax professionals, senior tax directors and senior revenue officials will share their knowledge and experience on the key topics of strategic & practical interest. The discussion would aim to highlight and identify emerging issues and challenges from Income Tax perspective. The Conference would provide a unique opportunity to participate in an in-depth analysis on each of the subjects and also provide an opportunity to interact with the eminent speakers & participants.

**IFA INDIA-WRC CONFERENCE**  
**INTERNATIONAL TAXATION & TRANSFER PRICING - EVOLVING LANDSCAPE**  
**JUNE 28<sup>TH</sup> & 29<sup>TH</sup>, 2013, HOTEL TAJ PRESIDENT, MUMBAI**

**CONFERENCE PROGRAMME**

<u>Day 1: June 28, 2013 (Friday)</u>		<u>Day 2: June 29, 2013 (Saturday)</u>	
08:30 - 09:30	Registration and tea/coffee	09:00-09:30	Registration
09:30 - 10:00	Inauguration by Hon'ble Justice S J Vazifdar, Bombay High Court & Porus Kaka, Senior Advocate & President-Elect of IFA		
<b>Session 1: Application of Tax Treaties to New Business Models arising from the Internet 10:00 to 13:00</b>		<b>Session 4: Moot Court on Indirect Transfers – Case Studies 09:30 to 12:00</b>	
Moderator	Porus Kaka, Senior Advocate & President-Elect of IFA	Judge	Hon'ble Justice D Y Chandrachud, Bombay High Court
Speakers	Jacques Sasseville, OECD	Participants	Rohan Shah, ELP
	Ashwini Sachdev, Microsoft		Girish Dave, Former Director International Tax, India
	Vijay Mathur, PwC		Dinesh Kanabar, KPMG *
	P. V. Srinivasan, Wipro		Gokul Chaudhri, BMR
13:00 to 14:00 – Lunch		12.00 to 12.15 – Break	
<b>Session 2: Beneficial Ownership 14.00 to 15.45</b>		<b>Session 5: Foreign Account Tax Compliance Act (FATCA) 12.15 to 13.00</b>	
Chairman	S.E. Dastur, Senior Advocate	Speaker	Anthony Calabrese, E&Y, UK
Speakers	Pinakin Desai, EY		
	Ketan Madia, GE	13:00 to 14:00 – Lunch	
	G.C. Srivastava, Former Director General – International Tax	<b>Session 6: Transfer Pricing – Recent High Profile Litigation, Developments including APA, Morality v Technicality in Tax World 14.00 to 17.00</b>	
		<b>Chairman</b>	Former Chief Justice of India, S H Kapadia
15:45 to 16:15 - Tea and Snacks		Moderator	Mukesh Butani, BMR
<b>Session 3: Recent Developments in International Taxation - OECD Reports / UN Reports / DTC, Key Rulings, etc. 16.15 to 18.00</b>		Speakers	Shyamal Mukherjee, PwC
Chairman	<b>To be decided.</b>		Monique Van Herksen, EY Netherlands
Speakers	N C Hegde Deloitte		Rohit Agarwal, Vodafone
	Shefali Goradia, BMR		Anish Chakravarthy, Deloitte
	Pramod Kumar, Member – Income Tax Appellate Tribunal		Sabine Wahl, PwC
	Jacques Sasseville, OECD	Close of Conference by Chairman, WRC- IFA India	

**\*Confirmation awaited.**

**Enrolment Form**  
**IFA India-WRC Conference**  
**"International Taxation & Transfer Pricing - Evolving Landscape"**  
**28<sup>th</sup> & 29<sup>th</sup> June 2013, Hotel Taj President, Mumbai**

Name: \_\_\_\_\_

**Registration category (please tick as appropriate)**

- |  | IFA Members  | Non-members                           |
|--|--|---------------------------------------|
|  | Delegate Fee <input type="checkbox"/> Rs. 12,921/- | <input type="checkbox"/> Rs. 15,168/- |
| <input type="checkbox"/> 3 (Three) or more than 3 (Three) Delegates from the same organisation – 15% Discount on Delegate fees |  |                                       |
| <input type="checkbox"/> 5 (Five) or more than 5 (Five) Delegates from the same organisation – 20% Discount on Delegate fees   |  |                                       |
| <input type="checkbox"/> Discount of Rs. 500/- for YIN members   |  |                                       |

Service tax of 12.36% is included in the registration fees.

IFA Membership No: \_\_\_\_\_

Mailing address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Tel: \_\_\_\_\_ (O) \_\_\_\_\_ (R) \_\_\_\_\_ Fax \_\_\_\_\_

Mobile: \_\_\_\_\_ Email ID: \_\_\_\_\_

**Detail of Payments:**

1. Draft/Cheque No.: \_\_\_\_\_ Dated \_\_\_\_\_ Drawn on \_\_\_\_\_  
for Rs. \_\_\_\_\_ in words [ \_\_\_\_\_ ]

\_\_\_\_\_  
**Signature**

**Note:**

1. Please use block letters, preferably typewritten and fill complete details.
2. Outstation members should pay by Demand Draft, payable at Mumbai.
3. The demand drafts / cheques should be drawn in favour of INTERNATIONAL FISCAL ASSOCIATION – INDIA BRANCH – WRC.

For further details and registration, please contact:

**Mr. Prabhakar at IFA India-WRC**

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