

# International Fiscal Association – India Branch Western Region Chapter

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#### **INTERNATIONAL FISCAL ASSOCIATION – INDIA BRANCH - WRC**

## **LIST OF EVENTS - FY- 2016-17**

#### **CONFERENCE ON INTERNATIONAL TAX BUDGET PROPOSALS OF 2016:**

The details of the program are as follows:

- > Day & Date: Friday, 29<sup>th</sup> April 2016,
- > Time: 09.00 am to 05.00 pm
- Venue: 4<sup>th</sup> Floor, Rangaswar Hall, Yashwantrao Chavan Pratishthan, Nariman Point, Mumbai

	Subject	Time	Speakers / Panellists			
			Speakers / Parientsts			
Registration (9 AM to 9.30 AM)						
1.	Key note & Welcome Speech	9.30 AM to 9.50 AM	Porus Kaka, President, IFA Netherlands			
2.	Equalisation levy & related case studies including comparative analysis with foreign regimes	9.50 AM to 11.20 AM	Chair: Pranav Sayta Panellists: Rashmin Sanghavi, Shefali Goradia (BMR)			
Networking & Tea Break (11.20 AM to 11.35 AM)						
3.	Patent Box & related case studies including comparative analysis with foreign patent	11.35 AM to 1.00 PM	Chair: Mr. Vipul Jhaveri			
	regimes		Panellists: Budget proposal and issues, International perspective: Kuntal Dave			
	India APA update and Q&A session		APA Updates – Paresh Parekh			
Lunch Break (1 PM to 1.45 PM)						
4.	Place of Effective Management & related Case studies	1.45 PM to 3.15 PM	Chair: Gautam Doshi			
			Panellists: Padamchand Khincha, Nilesh Kapadia, Praveen Sood (Tata Steel)			
Tea and Networking Break (3.15 PM to 3.30 PM)						
5.	Master file & Country by Country (CbC) Reporting – Resultant BEPS-type Risks & compliance challenges	3.30 PM to 4.45 PM	Chair: TP Ostwal Panellists: Vishal Nanavati (Pwc), Mr. Hasnain Shroff (KPMG) Ameya Kunte (TaxSutra)			
6.	Closing remarks	4.45 PM to 5 PM	Sushil Lakhani			

## TWO DAYS CONFERENCE ON "INTERNATIONAL TAX PLANNING & STRUCTURE - POST BEPS"

17<sup>th</sup> and 18<sup>th</sup> June, 2016 at Hotel St. Regis, Phoenix Mill Compound, Lower Parel, Mumbai

This conference will take place in the backdrop of:

- (a) Release of 2015 BEPS deliverables by OECD,
- (b) Implementation of IGA by India under FATCA,
- (c) Implementation of multi lateral exchange of information agreement by India,
- (d) Developments in international tax jurisprudence in general &
- (e) Changes in Indian Tax Regime by Finance Act 2016 (especially in the context of BEPS).

Time	Program	Speaker
08:30 - 09:00	Registration	
09:15 – 10:00	Opening Ceremony & Inauguration Opening Remarks Welcome Remarks	Mr. Porus F. Kaka - <i>President of IFA Netherlands</i> Mr. Dev Darshan Sud* - <i>President - ITAT</i>
10:00 - 11:30	Seminar I Panel discussion: Treaty Abuse and Dispute Resolution - Influence of BEPS	Chair: Mr. Pramod Kumar – Member, ITAT Panel: Mr. Rohan Shah - Economic Laws Practice Mr. Shigeki Minami - Tax Counsel, Japan Intervention by
11:30 - 12:00	Refreshment Break	
12:00- 13:30	Seminar II  Presentation & panel discussion:  Cross border businesses after  BEPS - will they have to realign?  Patents & intangibles, digital  economy (equalization levy) &	Chair:  Mr. V. Lakshmikumaran- Lakshmikumaran & Sridharan Attorneys  Panel:  Mr. Padamchand Khincha - H C Khincha & Co  Ms. Shefali Goradia - BMR Advisors  Mr. Subhankar Sinha - Siemens Ltd, India
13:30 - 14:30	Lunch	
14:30 - 16:00	Seminar III Presentation & Panel discussion: Aggressive tax planning & BEPS - effect on concept of PE and source tax rules	Chair: Mr. Pranav Sayta - EY India Panel: Mr. Steve Towers - Deloitte, Singapore Mr. Girish Gurnani - GE India
16:00 - 16:30	Refreshment Break	
16:30 – 18:00	Seminar IV Presentation & Panel discussion: Transfer pricing - new guidelines under the BEPS particularly action 8, 9 10 & its impact on India	Chair: Mr, Amit Shukla – Member, ITAT Panel: Mr. Anis Chakravarty - Deloitte, India Ms. Manisha Pande – GE, India Mr. Kamlesh Varshney - CIT APA-1 Intervention by

9.00 - 10.30	Seminar V Presentation: Inbound Investments in India & Outbound Investments from India - Post BEPS - planning & challenges (for GAAR, PoEM/	Chair: Mr. Kuntal Dave- Nanubhai Desai & Co, India Panel: Ms. Geeta Jani - EY, India Mr. Vishal Gada – Dhruva Advisors LLP, India	
10:30 - 11:00	Refreshment Break		
11.00 – 12.30	Seminar VI	Acting Judge :	
	Moot court format Issues on PoEM/GAAR	Mr. R V Easwar -Former Judge, High Court of Delhi, Ex-Officiating President, ITAT	
		Panel:	
		Mr. C. S. Gulati – CIT, Income Tax	
12.30-13.30	Lunch		
13.30-15.00	Seminar VII	Chair:	
	Presentation & Panel discussion: Multilateral instruments,	Mr. T. P. Ostwal - T. P. Ostwal & Associates  Panel:	
	Automatic exchange of information	Mr. Rahul Navin - DIT(TP), New Delhi	
	- paradigm shift in global	Mr. Steve Towers - Deloitte, Singapore	
	environment & disclosure of tax planning structures	Mr. Ameya Kunte - Taxsutra	
15:00 - 15:30 Refreshment Break			
15.30-17.00	Seminar VIII	Chair:	
	Presentation: Recent international tax developments (other than related to BEPS)	G. S. Pannu – Member, ITAT	
		Panel:	
		Mr. Amar Mehta – Canada	
		Mr. Hitesh Gajaria – KPMG, India	

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