



# International Tax Conference 2019

International Fiscal Association  
&

International Bureau of Fiscal Documentation (IBFD)

April 26 & 27, 2019 • New Delhi – India



## DAY 1

Friday, 26th April, 2019

08:00 – 09:00 **Registration**

09:00 – 09:45 **Conference Opening**

09:00 – 09:10 **Welcome Address**

Mukesh Butani, Conference Chairman

09:10 – 09:20 **Theme Address**

Porus Kaka, Senior Advocate

09:20 – 09:40 **Key Note Address**

Parthasarathi Shome, Chairman, International Tax Research and Analysis Foundation

09:40 – 09:45 **Message from IFA President**

Murray Clayson, IFA President / IBFD

09:45 – 09:45 **Vote of thanks**

Ajay Vohra, Conference Chairman

09:45 – 11:15 **Plenary 1**

### Tax Reform Agenda as the New Code

Chairman:

Justice R.V. Easwar

Moderator:

Ajay Vohra, Senior Advocate

Panelists:

Akhilesh Ranjan (Member CBDT)

Girish Ahuja, CA

Ketan Dalal

KK Chaitanya

11:15 – 11:30 Refreshment break

11:30 – 13:00 **Plenary 2**

### BEPS Action – 1, Digital Economy – The emerging permanent establishment and attribution issues

Chairman:

Justice PP Bhat (President, ITAT)

Moderator:

Dinesh Kanabar, Dhruva Advisors

Panelists:

Pramod Kumar (VP, ITAT)

Akhilesh Ranjan (Member CBDT)

Dr. Amar Mehta, Indigenous Consulting Inc. Canada

N. Meyappan (Nishith Desai)

Dhruv Sanghvi

Sam Sim, IBM Singapore

13:00 – 14:00 **Luncheon address**

followed by lunch

Justice Badar Durrez Ahmed

14:00 – 15:30 **Plenary 3**

### Principal Purpose Test (PPT) – the new form over substance test

### GAAR (General Anti-avoidance Rules) / POEM – experiences and perspective

Chairman:

Justice RV Easwar (Retd.)

Moderator:

Shefali Goradia, Deloitte

Panelists:

Girish Dave, Advocate

Dr. Vikram Chand

AL Meghji, Canada

Arvind Datar, Sr. Advocate

Rohinton Sidhwa

Sriram Govind, Vienna University

15:30 – 15:45 Refreshment break

15:45 – 17:15 **Plenary 4**

**Tax Dispute Resolution in post BEPS world (Alternate dispute resolution, MAP and AAR)**

Chairman: Justice AK Sikri  
Moderator: Mukesh Butani  
Panelists: Gurbachan Singh, Singapore  
HetherGething, Herbert Smith UK  
Rajat Bansal  
Kunj Vaidya, PwC  
AL Meghji, Canada

**Day 2**

**Saturday, 27th April 2019**

09:45 – 11:15 **Plenary 5**

**BEPS Action 7 - Artificial Avoidance of Permanent Establishment**

Chairman: Justice Vineet Kothari  
Moderator: Padam C. Khincha  
Panelists: Porus Kaka  
Gokul Choudhry  
Kamlesh Varshney  
Amit Shukla (Member, ITAT)  
Amar Mehta  
Nisha Gupta, Honeywell  
Hether Gething, Herbert Smith

11:15 – 11:30 Refreshment break

11:30 – 13:00 **Plenary 6**

**Significant Recent Developments in International taxation (International & Domestic)**

Chairman: Justice Vibhu Bakhru  
Moderator: Vishal Anand  
Panelists: Mark Levey, USA  
Belema R. Obuoforibo, Director, IBFD Knowledge Centre  
Pranav Sayta  
Daksha Baxi, CAM  
Lee, Kyung Geun, YulchonKorea  
GS Pannu (VP ITAT)

13:00 – 14:00 **Luncheon address**

followed by Lunch  
Eminent Speaker

14:00 – 15:30 **Plenary 7**

**Transfer Pricing: supply chain to value chain**

Chairman: Justice Ravindra S. Bhat  
Moderator: Rahul Mitra, Dhruva Associates  
Panelists: Prashant Maharshi (Member ITAT)  
Dr. Raffaele Petruzzi  
Vijay Iyer  
Sanjeev Malhotra  
Shobhan Kar (APA)  
Shikha Gupta, HUL

15:30 – 15:45 Refreshment break

15:45 – 17:00 **Plenary 8**

**Tax Risk Management - Taxpayers rights and obligation (the Taxpayers and Tax practitioner's perspective)**

Chairman: Justice S. Murlidhar  
Moderator: Mukesh Butani, BMR Legal  
Rahul Naveen  
PV Srinivasan  
Hitesh D. Gajaria  
Pallavi Bakhru, Vedanta

17:00 **Valedictory address** Dr. Justice DY Chandrachud / Abhishek M. Singhvi, Senior Advocate