



# International Fiscal Association

Bangalore Sub-chapter

## Emerging Tax Trends for Cross-border Business in India

### About the Conference

The Indian tax authorities have been spear-heading a strong evolution of taxation principles impacting cross-border business in India. Added to this are the recent developments in the area of FEMA, BEPS, Companies Act 2013 which emerge as a new legal arena to reckon with.

In this backdrop, IFA Bangalore Sub-Chapter has taken initiative of conducting conference on International Taxation to discuss on these latest international taxation trends. Eminent professionals with rich practical experience have agreed to contribute for the deliberations at the Conference.

#### Delegate Fees

For IFA Members: Rs.3,000/-

For Non members : Rs.3,500/-\*

*\*Group Discount of Rs.500/- per person if 3 or more register from one organisation)*

The Cheque to be in favour of "**International Fiscal Association - India Branch**" and cheques to be delivered to:

Attention: IFA Conference, Suresh & Co., 43/61, Surveyor's Street, Basavanagudi, Bangalore 560 004. Ph: +91-80-26509214 / 26623610

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Venue

The Capitol Hotel

CALENDAR



Block your dates

21<sup>st</sup> Feb - 22<sup>nd</sup> Feb  
2014

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### About IFA

The International Fiscal Association (IFA) was established in 1938 with its headquarters in the Netherlands. It is the only non-governmental and non-sectoral international organisation dealing with fiscal matters.

Its objects are the study and advancement of international and comparative law in regard to public finance, specifically international and comparative fiscal law and the financial and economic aspects of taxation.

IFA seeks to achieve these objects through its Annual Congresses and the scientific publications relating thereto as well as through scientific research. Although the operations of the IFA are essentially scientific in character, the subjects selected take account of current fiscal developments and changes in local legislation.

## Day 1 – 21st February, 2014 (Friday)

<b>9.30 am – 10.00 am</b>	<b>Inaugural Session</b> ➤ <b>Mr. Porus Kaka</b> , Senior Counsel- President Elect IFA Worldwide
<b>10.00 am – 10.30 am</b>	<b>Keynote Address : T.V.Mohandas Pai-Chairman Manipal Education Services</b>
<b>10.30 am – 10.45 am</b>	<b>Tea Break</b>
<b>10.45 am – 1.00 pm</b>	<b>International Tax Developments - Chairman</b> <b>Mr. Girish Dhawe, Former Director of International Taxation, Counsel and Litigation Advisor- Deloitte</b> ➤ BEPS-OECD developments and approach of developing countries – Mr. Kanan Raman, Director, E&Y ,UK ➤ Attribution of Profits- India's approach post UN Model and OECD model – <b>Jayesh Sanghvi</b> Partner & National Leader - International Tax Services
<b>1.00 pm – 2.00 pm</b>	<b>Lunch</b>
<b>2.00 pm – 3.30 pm</b>	<b>International Tax Issues – Chairman</b> <b>Mr. T. P. Ostwal, Partner, TP Ostwal &amp; Associates</b> ➤ India's approach on Interpretation of Treaties Past and Future (Relevance post Verizon/Sanofi ruling) – Mr. K.R. Sekar, Leader International Tax, Deloitte Haskins& Sells ➤ Indirect Transfer and GAAR- Future controversies and way-forward – Mr. P.V Srinivasan, Global Tax-Head, Wipro
<b>3.30 pm – 3.45 pm</b>	<b>Tea Break</b>
<b>3.45 pm – 5.30 pm</b>	<b>Transfer Pricing- Emerging Trends – Chairman</b> <b>Mr. N.C. Joshi- Director General of International Taxation- Tentative *</b> ➤ Recent Rulings- What is in store for future – Mr. Amod Khare, Partner, BMR ➤ Emerging Trends in India and developing country - Mr. Anis Chakravarthy, Senior Director, Transfer Pricing Deloitte

## Day 2– 22<sup>nd</sup> February, 2014 (Saturday)

<b>9.30 am – 11.30 am</b>	<b>Beneficial Ownership and Substance – Mr. N.C. Joshi- DGIT- Tentative (Chairman)*</b> ➤ Beneficial Ownership- Issues and India approach - Mr. Ajay Vohra, Partner, Vaish Associates Advocates ➤ Substance s v Form- Intermediary Holding co and Challenges – Mr. Padam Khincha, Chartered Accountant ➤ PE- Challenges in Digital Economy - Mr. Rahul Garg, Partner, PwC
<b>11.30 am – 11.45 am</b>	<b>Tea Break</b>
<b>11.45 am – 1.00 pm</b>	<b>Foreign Tax Credits and Revenue Authorities – Emerging Approach - Chairman</b> <b>Mr. Sanjay Kumar IRS, Secretary – Tax Administrative Reforms Commission</b> ➤ Foreign Tax Credits- India and Emerging Approach – Mr. S. Krishnan, Chartered Accountant ➤ Approach of Revenue Authorities- Global Trends –Mr. K. Balasubramanian, General Manager-Tax, Wipro Limited
<b>1.00 pm – 2.00 pm</b>	<b>Lunch</b>
<b>2.00 pm – 3.30 pm</b>	<b>Cross Border Mergers and Acquisitions – Chairman</b> <b>Mr. Murali Ananthasivan, Partner, J.Sagar Associates-</b> ➤ Tax issues and Treaty issues – Mr. Saamil Shah, Partner, KPMG ➤ Company Law and RBI issues – Mr. Ganesh Raju, Partner, PwC
<b>3.30 pm – 3.45 pm</b>	<b>Tea Break</b>
<b>3.45 pm – 4.15 pm</b>	<b>Special Session</b> Writ/Alternative disputes under Income-tax Act – <b>K.P.Kumar- Senior Advocate - Bangalore</b>

**4.15 pm – 5.30 pm**

**Panel Discussion**

- Moderator - Mr. Sushil Lakhani (Partner, Lakhani & Associates)
- Panelist - Mr. K.K. Chytanya (Advocate Karnataka High Court) and Mr. K. R. Girish (Partner, B S R & Co. LLP) , A. Shankar- Advocate Karnataka High Court

