



International Tax Conference 2019

International Fiscal Association

&

International Bureau of Fiscal Documentation (IBFD)



New Delhi – India

April 26 & 27, 2019

www.ifaindia.in

IFA India in collaboration with IBFD will be holding two-day International Tax Conference titled “**Emerging International Taxation Landscape**” in New Delhi on April 26 & 27, 2019.

This conference will feature leading international and regional tax experts and representatives from tax authorities and judiciary, across the globe.

Bloomberg/Quint is the exclusive Media Partner.

Several topical issues relating to tax reforms and the new Direct tax code, impact of BEPS on digital economy, Artificial Avoidance of PE, Principal Purpose Test (PPT), GAAR / POEM, Tax Dispute resolution in post BEPS world and other Significant Recent Developments in International taxation, shall be discussed at the Conference.

The Conference would provide an excellent opportunity for exchange of views and knowledge sharing in the area of international tax policy, administration and jurisprudence with well-known Indian and International Tax Practitioners and Government officials.

Conference Programme

Business Reorganization and Tax Disputes in the Start-up World

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

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

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

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

BEPS Action 7 - Artificial Avoidance of Permanent Establishment

Significant Recent Developments in International taxation (Int. & Domestic)

Transfer Pricing: supply chain to value chain

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

See Detailed programme

Conference Venue: 'Crystal Ball Room', The Lalit New Delhi

The Lalit New Delhi is located in central Delhi in close proximity to key commercial and business locations. The 461 room property epitomizes the luxury hotel experience with exemplary service & warm hospitality soaked in Indian traditions



Registration Details:

A. The registration fee is as under:

[1] Early bird rates up to 31st March, 2019:

Category	Indian Participant (INR)	Foreign Participant (USD)
IFA member	10,500	160
Non-IFA member	12,500	190
YIN IFA member/ Govt. Officials	8,500	130

[2] Rates from 1st April, 2019:

Category	Indian Participant (INR)	Foreign Participant (USD)
IFA member	11,500	175
Non-IFA member	13,500	200
YIN IFA member/ Govt. Officials	9,500	150

Fees are inclusive of GST @ 18%

B. There are two ways in which you can register your name for the same.

[1] Online:

You can visit the IFA - India site through the link provided below; fill in your details, make the payment of participation fee online to register your name.

http://www.ifaindia.in/new_conference_registration.aspx

[2] Enrolling by making a payment through cheque:

Alternatively, you can send us the payment through cheque or demand draft/pay order along with your details.

Please find below our bank details.

Beneficiary Name	International Fiscal Association - India Branch
IFA Address	C-56/9A, Sector-62, Noida, U.P. - 201 301 (this is where to courier)
Beneficiary Bank	IndusInd Bank Limited
Bank Address	N-10-11, Sector-18, Noida-201301
Type of Account	SAVING ACCOUNT-TASC Regular
Account No.	100003603083
IFSC	INDB0000036
MICR No.	110234006

Kindly let us know when you send us the payment so that we can keep a track of the same from our end as well.

C. Your stay in Delhi:

Further, regarding your stay, we have negotiated concessional rate (of INR 6000 plus taxes, per night, inclusive of breakfast) for stay at the conference venue, Hotel 'The Lalit'. If you choose to stay at the hotel, kindly let us know and we shall co-ordinate the reservation.

For obtaining an invoice for the payment you make towards the conference registration fee; we would request you to mail us the following detail.

Name of the Participant	
IFA Membership Number	
Corporate Member / Individual Member	
Date of payment of last IFA Membership Fee	
Mobile Phone Number	
Email ID	
Invoice in favour of: (Name / Name of the Company)	
GST No. [Please send also copy of GST Certificate]	
Address with postal PIN code	

D. Sponsorships:

The annual conference encourages participation and support of corporates and professional services firms. Opportunities for such support include:

Platinum: INR 12 lacs	Gold: INR 8 lacs	Silver: INR 5 lacs	Associate: INR 2 lacs
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In addition, we would encourage your support for hosting lunch, conference bags & stationery etc. We shall be sending details of benefits to supporting Organizations in due course.



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DAY 1

Friday, 26th April, 2019

08:00 – 09:00

Registration

09:00 – 09:45

Conference Opening

09:00 – 09:05

Welcome Address

Mukesh Butani, Conference Chairman

09:05 – 09:15

Theme Address

Porus Kaka, Senior Advocate

09:15 – 09:30

Guest Speaker

Akhilesh Ranjan, Member, CBDT

09:30 – 09:40

Guest of Honour

Hon'ble Mr. Justice (Retd.) PP Bhat, President ITAT*

09:40 – 09:50

Key Note Address

Hon'ble Mr. Justice (Retd.) T S Thakur*

09:50 – 09:58

Message from IFA President

Murray Clayson, IFA President / IBFD

09:58 – 10:00

Vote of thanks

Ajay Vohra, Conference Chairman

10:00 – 11:30

Plenary 1

Business Reorganization and Tax Disputes in the Startup World

Chairman:

Hon'ble Mr. Justice (Retd.) Badar Durrez Ahmed

Moderator:

Ajay Vohra, Senior Advocate

Panelists:

Saurabh Srivastava, Angel Investor

Rohan Shah, Advocate

Rajesh Bhoot, Jt. Secretary, Tax Policy and Legislation (CBDT)

Parul Jain, Deloitte

Vivek Gupta, KPMG

Ramesh Abhishek, Secretary, DPIIT

11:30 – 11:45

Refreshment break

11:45 – 13:15

Plenary 2

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

Chairman:

Hon'ble Mr. Justice (Retd.) PP Bhat, President ITAT*

Moderator:

Dinesh Kanabar, Dhruva Advisors

Panelists:

Pramod Kumar (VP, ITAT)*

Rashmi Ranjan Das

Dr. Amar Mehta, Indigenous Consulting Inc. Canada

N. Meyappan (Nishith Desai)

Dhruv Sanghvi, Maastricht University, Netherlands

Sam Sim, IBM Singapore

13:15 – 14:00

Luncheon address

followed by lunch

Aditya Ghosh, OYO*

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:

Hon'ble Mr. Justice (Retd.) RV Easwar*

Moderator:

Shefali Goradia, Deloitte

Panelists:

Girish Dave, Advocate

Pratibha K Advani, Tata Communications

Ashrita Prasad Kotha, Jindal Global

Rohinton Sidhwa, Deloitte

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: Hon'ble Mr. Justice (Retd.) A K Sikri
Moderator: Mukesh Butani, BMR Legal
Panelists: Arvind Datar, Sr. Advocate
GS Pannu (VP ITAT)
Sriram Govind, Vienna University
Kunj Vaidya, PwC
Priya Ranjan Das, Joint Secretary (FT & TR-1)
Karishma R. Phatarphekar, Deloitte

Day 2

Saturday, 27th April 2019

09:45 – 11:15 **Plenary 5**

BEPS Action 7 - Artificial Avoidance of Permanent Establishment

Chairman: Hon'ble Mr. Justice Vineet Kothari
Moderator: Padam C. Khincha
Panelists: Sriram Seshadri, PwC
Sanjeev Sharma, CIT(APA)*
Amit Shukla (Member ITAT)
Amar Mehta, Indi-Genius Consulting Inc, Canada
Nisha Gupta, Honeywell
Dr. Raffaele Petruzzi, Vienna University

11:15 – 11:30 Refreshment break

11:30 – 13:00 **Plenary 6**

Significant Recent Developments in International taxation (International & Domestic)

Chairman: Hon'ble Mr. Justice Vibhu Bakhru*
Moderator: Vishal Anand, PwC
Panelists: Belema R. Obuoforibo, Director, IBFD Knowledge Centre
Nikhil Mehta, Gray's Inn Tax Chambers
Pranav Sayta, EY
Daksha Baxi, CAM
Lee, Kyung Geun, Yulchon Korea

13:00 – 14:00 **Luncheon address**

followed by Lunch

Hon'ble Mr. Justice (Retd.) Madan Lokur

14:00 – 15:30 **Plenary 7**

Transfer Pricing: supply chain to value chain

Chairman: Hon'ble Mr. Justice Ravindra S. Bhat*
Moderator: Rahul Mitra, Dhruva Associates
Panelists: Prashant Maharshi (Member ITAT)*
Dr. Raffaele Petruzzi, Vienna University
Vijay Iyer, EY
Sanjeev Malhotra, Baker Mckenzie
Shobhan Kar (APA)

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: Hon'ble Mr. Justice S. Murlidhar*
Moderator: Mukesh Butani, BMR Legal
Panelists: Rahul Naveen, Commissioner, Income Tax*
Arun Anandagiri, Taxsutra
Gurbachan Singh, Singapore
PV Srinivasan
Nikhil Mehta, Gray's Inn Tax Chambers
Hitesh D. Gajaria
Puja Nalam, Indigo

17:00 **Valedictory Session** : moderated by Menaka Doshi, Managing Editor, Bloomberg | Quint
Closing of the Conference