

Dear Sir,

Greetings from IFA

We are pleased to inform you that IFA-India is organizing its annual two-day International Tax Conference, 2018 on 27-28 April. The conference will be held at New Delhi at Hotel The Lalit.

A galaxy of eminent speakers from India and abroad will address a wide variety of topics relating to international taxation and transfer pricing. The conference would be attended by tax professionals including tax practitioners, corporate tax heads and senior tax executives, tax administrators, tax policy makers, senior government officials and tax court judges, across the globe. The conference would provide an excellent opportunity for exchange of views and sharing of knowledge in the area of international tax policy and tax jurisprudence world over. A detailed programme outline, with names of the speakers and the panelists, is enclosed.

Broad themes to be discussed are as follows:

- BEPS Action-1, Report on Digital Economy- PE issues and impact on developing countries.
- BEPS Action-15- Multi-lateral Instrument- Global harmonisation and enforcement.
- Introduction and Enhancement of GAAR in Asia and effect on and consequences for treaty shopping, and treat- abuse case studies.
- Global Tax Developments - US Base Erosion Anti- Abuse Tax (BEAT) and other relevant provisions in the USA tax reform bill; Australian Federal Court decision in the case of Tech Mahindra Limited, Exchange Information, FATCA- real life situations.
- BEPS Action-7- Artificial Avoidance of PE- EPC contracts, anti fragmentation, preparatory and auxiliary activities, commissionaire arrangements, e-commerce transactions.
- Transfer Pricing and Tax Litigation- Future scenario, Dispute Resolution Panel, Bi-lateral APA / MAP.
- Block Chain Technology and Crypto Currency.

The registration fee is as under:

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

Fees are inclusive of GST @ 18%

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

Alternatively, you can send us the payment through cheque or demand draft/pay order as well.

[2] Enrolling by making a payment through cheque:

You may write a cheque and have the same couriered to us 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
MICRO 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.

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 me know and we shall co-ordinate the reservation.

May you require any information or assistance, please feel free to get in touch with Ms. Shelly Wadhwa. You may drop an email at shelly.wadhwa@ifaindiaacademy.in and info@ifaindiaacademy.in along with your contact number.

As only limited seats are available, I would urge that you register at the earliest.

I look forward to meeting you at the Conference.

Best regards,

Ajay Vohra
Conference Chairman

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INTERNATIONAL TAX CONFERENCE 2018
CHANGING WORLD ORDER AND INTERNATIONAL TAXATION
April 27-28, 2018, The Lalit, New Delhi

CONFERENCE PROGRAMME

Friday, April 27, 2018

Timings	Description	Speaker / Panelist
08.00 – 09.00	Registration	
	Conference opening	
09.00 – 09.10	- Welcome Address	Ajay Vohra, Senior Advocate & Conference Chairman
09.10 – 09.20	- Message from IFA President	Murray Clayson
09.20 – 09.45	- Key Note Address	Suresh Prabhu, Minister of Commerce & Industry
09.45– 09.45	- Vote of Thanks	VP Gupta, Vice Chairman, IFA-India Branch
09.45 – 11.15	Plenary 1 : BEPS Action – 1, Report on Digital Economy - PE issues and impact on Developing countries	Chairman : Vijay Mathur (PWC)*
		Dinesh Kanabar (Moderator)
		Akhilesh Ranjan, Pr. CCIT (International - tax)
		Pranav Sayta (EY)
		Ms. Shefali Goradia (Deloitte)
		Gary Gowrea (Mauritius)
		Amar Mehta (Canada)
11.15 – 11.30	Refreshment Break	
11.30 – 13.00	Plenary 2 : BEPS Action 15 - Multi-lateral Instrument – Global Harmonization and Enforcement	Chairman: Akhilesh Ranjan, Pr. CCIT (International - tax)

		Gokul Chaudhary (Moderator)
		Sanjiv Chaudhary (KPMG)
		Rajat Bansal (IRS)
		Maikal Evers, OECD, France (through skype)
		Gurbachan Singh (Singapore)
13.00 – 14.00	Luncheon address – Push towards Digital Economy, followed by lunch	Ajay Prakash Sawhney, Secretary, IT & Electronics
14.00 – 15.30	Plenary 3 : Introduction and Enhancement of GAARs in Asia and Effect and Consequences for Treaty Shopping / Treaty Abuse – case studies	Chairman : Arvind Datar, Sr. Advocate
		Ajay Vohra (Moderator)
		Padam Kincha, CA
		Ms. Heather Gething, (UK)
		Dr. Vikram Chand , University of Lausanne (through skype)
		Paul McNab, (PwC Australia)
		Sushil Lakhani, Chairman, IFA India Branch
		Rakesh Nangia, Nangia & Co.
15.30 – 15.45	Refreshment Break	
15.45 – 17.15	Plenary 4: Global tax developments - U.S. tax reform: Base Erosion Anti-Abuse Tax (BEAT); Foreign-derived Intangible Income and Global Intangible Low-Taxed Income; Australian Federal Court decision in the case of Tech Mahindra Ltd.; Exchange of Information, FACTA – real life situations	Chairman : Ms. Pragya Saxena, (CBDT)
		Abhishek Goenka (PwC) (Moderator)
		Lloyd Pinto (GT)
		Paul McNab (PwC Australia)
		Rajesh Simhan , Nishith Desai & Associates*
		S. Krishnan
		Mr. Vinay Kumar (IRS)*

Conference Programme

Saturday, April 28, 2018

Timings	Description	Speaker / Panelist
09.45 – 11.15	Plenary 5 : : BEPS Action 7 – Artificial Avoidance of PE – EPC contracts, Anti Fragmentation, preparatory auxiliary activities, commissionaire arrangements, e-Commerce Transaction	Chairman : Justice Vibhu Bakhru
		Vishal Anand (Moderator)
		Rohinton Sidhwa (Deloitte)
		Amar Mehta (Canada)
		Vikas Vasal (GT)
		TP Ostwal, TP Ostwal & Associates
		Sanjeev Sharma (IRS)
11.15 – 11.30	Refreshment Break	
11.30 – 13.00	Plenary 6 : Transfer Pricing (Post BEPS Scenario - CbCR, Business restructuring, Business restructuring and Permanent Establishments, restructuring of intangibles, Profit Split – Applications in Practice)	Chairman : Amit Shukla (ITAT)
		Rahul Mitra (Moderator)
		Vijay Iyer (EY)
		Sanjiv Malhotra (Baker & McKenzie)
		Yuri Matsubara, Japan
		Rupak Saha (GE)
		Ms. Malathi Sridharan (IRS)
		Himanshu Sinha, Trilegal
13.00 – 14.00	Luncheon address by an eminent personality	Injeti Srinivas , Secretary Ministry of Corporate Affairs*
14.00 – 15.30	Plenary 7 : Tax Litigation – Future scenario (Arbitration, Dispute	Chairman : Justice A.K. Sikri
		Mukesh Butani (Moderator)

	Resolution, Bilateral, APA, MAP	V. Lakshmikumar (L&S) Gurbachan Singh (Singapore) Kyung Geun Lee, Yulchon, Korea Kamlesh Varshney (IRS) Pallavi Bakhru, Vedanta
15.30 -15.45	Refreshment Break	
15.45 – 17.00	Young India Network (YIN) Session Plenary 8 : Regulatory & tax implications reg. Block chain technology-Crypto currency	Chairman : Mukesh Butani , Advocate Kuntal Dave (Moderator) Sajan Poovayya, Sr. Advocate* Ms. Sonia Mathur, Sr. Advocate Ms. Shikha Mehra, Global Jindal Meyyappan Nagappan, Nishith Desai & Associates
17.00 -17.30	Valedictory Address	Harish Salve, Sr. Advocate*
	Close of Conference	

**To be confirmed*