



Western Region Chapter International Fiscal Association – India Branch

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IFA India-WRC Conference International Tax – The Emerging Landscape 6-7 July 2012, Hotel Taj President, Mumbai

International Tax is back to the centre stage in India especially with the size & scale of amendments in the Finance Act, 2012 (many of them with retrospective effect) which could have wide applicability & the implications of which could be extremely far reaching. This itself was in the backdrop of a series of important judgments of various Courts (including the celebrated judgment of the Supreme Court in Vodafone's case), Tribunals and the Authority for Advance Ruling. All this put together calls for a discussion to analyse the changing landscape of international tax in India.

With the key theme of the Conference being, '**International Tax – The Emerging Landscape**', IFA India-WRC will deliver a strategic conference which will focus on key components that cover international taxation and will be of great interest to Tax Professionals, Tax Directors, CFO's, Revenue Officials & Revenue Authorities.

The topics to be deliberated at the Conference have been carefully selected based on the recent developments which are likely to have far reaching implications, namely:

- ❖ Advance Pricing Arrangement (APA)
- ❖ General Anti Avoidance Rules (GAAR)
- ❖ United Nations Model (UN Model)
- ❖ Transfer Pricing (TP)
- ❖ Other Recent Developments

Who should attend and why?

Eminent speakers from India & abroad, senior tax professionals, senior tax directors and senior revenue officials will share their knowledge and experience on the key topics of strategic & practical interest. The discussion would aim to highlight and identify emerging issues and challenges from Income Tax perspective. The Conference would provide a unique opportunity to participate in an in-depth analysis on each of the subjects and also provide an opportunity to interact with the eminent speakers & participants.

IFA INDIA-WRC CONFERENCE

INTERNATIONAL TAX – THE EMERGING LANDSCAPE

JULY 6-7, 2012, HOTEL TAJ PRESIDENT, MUMBAI

CONFERENCE PROGRAMME

<u>Day 1: July 6, 2012 (Friday)</u>		<u>Day 2: July 7, 2012 (Saturday)</u>	
08:30-09:30	Registration and tea/coffee	08:30-09:30	Registration and tea/coffee
09:30-10:00	Inauguration by Hon'ble Justice Dr D Y Chandrachud		
<i>Session 1: Advance Pricing Arrangements (APA)</i> <i>10:00 to 13:00</i>		<i>Session 4 (Part I): General Anti-Avoidance Rules (GAAR)</i> <i>09:30 to 13:00</i>	
Chairman	Porus Kaka (Senior Advocate, India)	Chairman	Soli Dastur (Senior Advocate, India)
Speakers	Dale Hill (Gowlings, Canada) Monique Van Herksen (E&Y, Netherlands) Vishweshwar Mudigonda (Deloitte, India) Sobhan Kar (Addl. CIT-APA, India)	Speakers	Bala Rajaraman (Deloitte, US) Dale Hill (Gowlings, Canada) David Duff (University of British Columbia, Canada) Dinesh Kanabar (KPMG, India) Promila Bhardwaj (DG – IT, India) Rupak Saha (GE, India) Yariv Brauner (Florida University, US)
13:00 to 14:00 – Lunch		13:00 to 14:00 – Lunch	
<i>Session 2: Transfer Pricing Amendments</i> <i>14:00 to 15:45</i>		<i>Session 4 (Part II):</i> <i>GAAR PANEL DISCUSSION WITH CASE STUDIES</i> <i>14:00 to 15:30</i>	
Chairman	Mukesh Butani (BMR Advisors, India)	Chairman – Soli Dastur (Senior Advocate, India) Panelists – Pranav Sayta (E&Y, India) All Speakers of GAAR Session	
Speakers	Rahul Mitra (PWC, India) Sunil Kothare (Citibank, India) Vijay Iyer (E&Y, India)	15:30 to 16:00 – Tea	
15:45 to 16:15 - Tea and Snacks		<i>Session 5: Recent Developments in International Taxation</i> <i>16:00 to 17:30</i>	
<i>Session 3: 2011 UN Model Convention</i> <i>16:15 to 18:00</i>		Chairman	Nishith Desai (Nishith Desai Associates)
Chairman	G.E. Veerabhadrapa (President - Income Tax Appellate Tribunal, India)	Speakers	Hon'ble Minister Mr. Arvin Boolell (BOI, Mauritius) Ajay Vohra Pinakin Desai (E&Y, India) Rohan Shah (ELP, India)
Speakers	Shefali Goradia (BMR Advisors, India) Roy Rohatgi (India) Pramod Kumar (Member - ITAT, India) T P Ostwal (T P Ostwal & Associates, India)		
<i>Felicitations of Porus Kaka on being unanimously proposed by the Executive Committee as the next President of International Fiscal Association, Netherlands.</i>		Close of Conference by Chairman, WRC- IFA India	
Cocktails and dinner			

ENROLMENT FORM

IFA India-WRC Conference
International Tax – The Emerging Landscape
6-7 July, 2012, Hotel Taj President, Mumbai

Name:

Registration category (please tick as appropriate)

IFA Members

Non-members

Delegate fee

Rs. 12,921/-

Rs. 15,168/-

3 (Three) or more than 3 (Three) Delegates from the same organisation – 15% Discount on Delegate fees

5 (Five) or more than 5 (Five) Delegates from the same organisation – 20% Discount on Delegate fees

Discount of Rs. 500/- for YIN members

Service tax of 12.36% is included in the registration fees

IFA Membership No:

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Detail of Payments:-

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.....Bank for Rs.

[.....]

(In words)

Signature

Note:

1. Please use block letters, preferably typewritten and fill complete details.
2. Outstation members should pay by Demand Draft, payable at Mumbai.
3. The demand drafts / cheques should be drawn in favour of INTERNATIONAL FISCAL ASSOCIATION – INDIA BRANCH - WRC

For further details and registration, please contact:

Mr. Prabhakar at IFA India-WRC

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Media Support

