



New issues and challenges continue to emerge, as economic activities become increasingly borderless. The number of international tax treaties has risen rapidly with the advent of globalization, leading to greater international tax competition and cooperation. As foreign direct investment continues to flow into India, multi national enterprises are exposed to cross-border tax issues, such as transfer pricing and tax competition. Multi national enterprises need understanding of importance of tax optimization when evaluating operation-related costs. Tax optimization has become a strategic imperative for business today, in order that shareholder wealth is maximized.

In this backdrop, IFA-Hyderabad has lined up key speakers at a two day conference to deliberate on various topics and gain understanding of the issues involved. Interesting topics concerning business issues like supply chain linked tax optimization, permanent establishment, transfer pricing, mutual agreement procedures, expatriate taxation and balancing service tax and withholding tax in cross-border payments will form the core discussions during the conference.

Further, the conference has special focus topics linked to pharmaceuticals and BPO sector, in order to understand and address issues currently facing these sectors. The conference will also help to meet the growing need for international tax updates, so that one is updated with recent controversies and emerging tax issues. Eminent speakers with rich practical background have been lined up to deal with the topics.

Since 2004, IFA-Hyderabad has conducted eleven value added seminar/events. This will be twelfth in order. Study circle meetings are held regularly on topics that interest the industry.

In view of restricted number of seats available, registration will be on first come first served basis.

Day 1 Friday, 12 December 2008

- 9:30 a.m. 10:30 a.m. Inaugural Session**
Address by Chief Guest
- 10:31 a.m. 10:45 a.m. Coffee Break**
- 10:46 a.m. 12:00 p.m. Expatriate Taxation:Structure & Planning Thereof**
Sampath Raghunathan, Dr. Reddy's Laboratories, Hyderabad

Increasingly, citizens of other countries are moving to India for short to medium periods, either on short term assignments or to manage transnational business enterprises. Indian MNCs are also employing foreign nationals or transferring their Indian employees to foreign countries to manage enterprises acquired abroad. This presentation is aimed at highlighting the issues in structuring and planning salary and compensation for such persons.

- 12:01 p.m. 1:15 p.m. Learning from recent international tax decisions**
Hitesh Gajaria, KPMG, Mumbai

We have noticed a spate of tribunal and court decisions on matters of international tax litigations. While the exact reach of the some of the recent decisions remains to be determined, they do open the door for discussions on the stance taken by the revenue department and the assessee respectively, and analysis of the final outcome of such litigation. This presentation will spotlight some of the key decisions that would be of critical significance to those involved in international taxation on a day-to-day basis.

- 1:16 p.m. 2:00 p.m. Lunch**
- 2:01 p.m. 3:15 p.m. Subsidiaries as Permanent Establishments**
PVSS Prasad, Prasad & Prasad, Hyderabad

There is a growing debate internationally on when a subsidiary, or its activities, may be a permanent establishment of its parent. This presentation will deal with analysis of conditions necessary to form a subsidiary permanent establishment, sub-contracting questions, classification of dependant and independent agents in the context of subsidiaries as permanent establishment, through examples of decided case laws around the world.

- 3: 16 p.m. 5:00 p.m. Economic analysis of Pharma Industry from TP perspective**
Sanjay Tolia, Pricewaterhouse Coopers, Mumbai

The Pharmaceutical industry has been in the vanguard of major strategic initiatives in order that they compete effectively in the current globalized world. With production, marketing, distribution and intellectual property vesting at different tax jurisdictions, transfer pricing assumes extreme significance. This presentation will deal with economic analysis of pharmaceutical industry from the transfer pricing perspective.

Day 2 Saturday, 13 December 2008

- 9:15 a.m. 10:30 a.m. Mutual Agreement Procedures: Process & Indian Experiences**
TP Ostwal, TP Ostwal & Associates, Mumbai

Of late, the competent authority process is receiving increasing importance in view of claims on assesses due to transfer pricing and other adjustments. The mutual agreement procedure enables tax payers to obtain double taxation relief when one treaty country makes a transfer pricing adjustment. This presentation will focus on the competent authority process and some past experiences in tackling this issue.

- 10:31 a.m. 10:45 a.m. Coffee Break**
- 10:46 a.m. 12:00 p.m. Cross border payments: Balance Between TDS & Service Tax**
KR Sekar & Krupa Venkatesh, Deloitte, Bangalore

In cross border payments, there may be incidences of withholding tax from the income tax angle and service tax on reverse charge mechanism from the service tax angle. This presentation will deal with how an integrated view of both aspects needs consideration while formalizing international service agreements and the delicate balance that needs to be achieved between them.

- 12:01 p.m. 1:15 p.m. Tax efficient supply chain management & Transfer Pricing**
Srinivas Rao, Ernst & Young, Bangalore

The importance of aligning tax and business strategies across the supply chain is of paramount importance. Enterprises constantly reconfigure their supply chains for many strategic and competitive reasons. This presentation will deal with the importance of achieving commercial objectives through relevant tax structuring, with the ultimate objective of reducing the effective tax rate.



1:16 p.m. 2:00 p.m.

Lunch

2:01 p.m. 3:45 p.m.

Panel discussion on TP issues in BPO sector

India has witnessed various stages in the evaluation of the BPO sector and in recent times, several niche segments have emerged offering specialized services. The panel will discuss various issues faced by the BPO sector, specially focusing on transfer pricing issues and some of the precautions that one may consider in planning business contracts in this sector.

3:46 p.m. 4:00 p.m.

Participants' feedback and closing

Delegate Fee

IFA Members

Non-Members

Early Bird Incentive*

Fee Structure

INR 3500/-

INR 5000/-

INR 4500/-

A group discount of 10% is available for nominations of 3 or more persons.

* This is available to non-members whose registration forms along with the Cheque/DD are received on or before 20 November, 2008

Registration forms with the cheque/draft drawn in favour of "IFA - Hyderabad Sub-Chapter" may be forwarded to B Sekkizhar, Secretary IFA, c/o Sathguru Management Consultants, Plot 15, Hindi Nagar, Punjagutta, Hyderabad 500 034.

The IFA

The International Fiscal Association (IFA) is a leading international non-governmental organization engaged in shaping the evolution of tax and fiscal policies across the globe. The association is involved in research in the areas of fiscal economics, tax administration and tax policies and comprises tax payers, tax advisers, lawyers, chartered accountants, company secretaries, cost and management accountants, government officials, and university professors and is a unique forum for discussing international tax questions.

The IFA was founded in 1938 and has its headquarters in the Netherlands. It has over 10,000 members worldwide from 90 countries with 45 national branches including the India Branch.

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Hyderabad Sub-Chapter
of
International Fiscal Association
India Branch (SRC)

Conference on
International Taxation & Transfer Pricing

Managing Tax Challenges in a Borderless World



at
ITC Hotel The Kakatiya, Luxury Collection
6-3-1187, Begumpet, Hyderabad 500016, Andhra Pradesh, India

on
Friday, 12 December - Saturday, 13 December, 2008