



International Tax Conference 2019

International Fiscal Association
&

International Bureau of Fiscal Documentation (IBFD)

April 26 & 27, 2019 • New Delhi – India



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