

PRESENTS

**TAXSUTRA
CONCLAVE
2017**
5th, 6th & 7th OCTOBER
THE OBEROI, GURGAON

BEPS AND BEYOND... THE DAWN OF A NEW ERA



Platinum Partner

Deloitte.

Gold Partner

d h r u v a
advisors llp

Silver Partners

**Baker
McKenzie.**

pwc

**Lakshmikumaran
& Sridharan**
attorneys

ELP ECONOMIC
LAW
PRACTICE
ADVOCATES & SOLICITORS

KPMG

Bronze Partners

BDO

NANGIA ADVISORS

earlyGST
by H&R BLOCK

RELIANCE

**MUTUAL
FUND**

P PhillipCapital
Your Partner In Finance

Associate Partners

Grant Thornton
An instinct for growth™

KATALYST
ADVISORS LLP

SKP

Premium Partner

IBFD



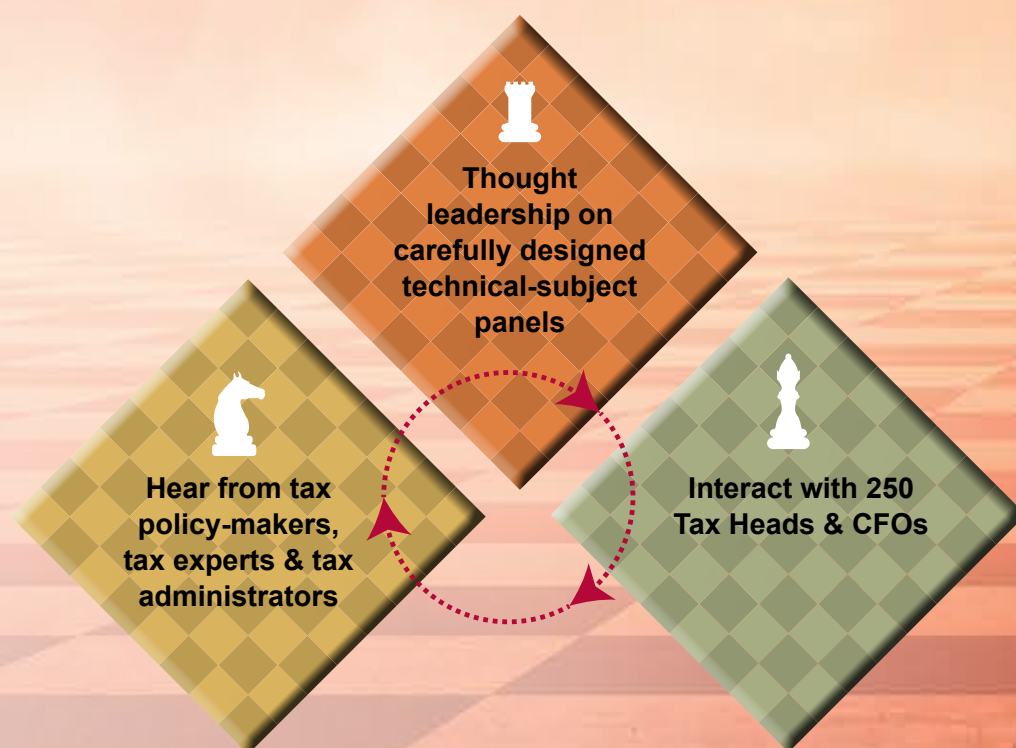
5th, 6th & 7th OCTOBER
THE OBEROI, GURGAON

Welcome Note

The old adage “When it rains, it pours” rings true for the global tax landscape right now. BEPS winds have attained gale force with OECD pulling off a historic signing of the Multilateral Instrument (MLI) by over 65 nations (which will amend over 1500 bilateral tax treaties in order to give effect to the BEPS recommendations) and closer home, Govt. of India’s “game changing” GST now an operational reality. While “tax” is the talk of the town right now, we at Taxsutra are set to bring it all together for you under one roof at the third edition of the “Conclave” which will see 3 days of riveting technical sessions by an ensemble speaker line-up, the Who’s Who of the Tax World in attendance along with lots of camaraderie.





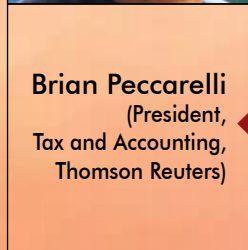


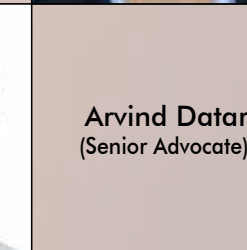




After the resounding success of the 2nd edition of the Conclave, we aim to further enhance our offering this year with the 3rd Edition that will bring together under one roof, the top tax minds from across the globe, CFOs/Corporate Tax Directors & IRS Officers.

Why attend the Taxsutra Conclave?



BEPS AND BEYOND... THE DAWN OF A NEW ERA

Conclave Speakers

	Harish Salve (Senior Advocate)		Grace Perez-Navarro (Deputy Director, OECD Centre for Tax Policy and Administration)		Mike Williams (Director, Business & International Tax, HM Treasury)		Akhilesh Ranjan (Pr. CCIT, International Tax & Transfer Pricing)
	Brian Peccarelli (President, Tax and Accounting, Thomson Reuters)		Simone Musa (Chair of Global Tax Practice, Baker & McKenzie)		Mohan Parasaran (Former Solicitor General of India)		Arvind Datar (Senior Advocate)
	Rajat Bansal (Joint Secretary, Ministry of Finance, India)		Clive Baxter (Head of Tax Governance and Policy, Maersk Group)		Pramod Kumar (Honourable Member, ITAT)		P. R. Ramesh (Chairman, Deloitte India)



Mr. Philip Baker
(Queen's Counsel)

“It (MLI) may signal an end to treaty-shopping, or give rise to innumerable disputes which fundamentally undermines confidence in the network of tax treaties”.



5th, 6th & 7th OCTOBER
THE OBEROI, GURGAON

Session Moderators

	Shereen Bhan (CNBC-TV18)		Vipul Jhaveri (Deloitte Haskins & Sells LLP)		Dinesh Kanabar (Dhruva Advisors LLP)
	Gautam Mehra (PwC India)		Rahul Mitra (KPMG in India)		Sanjiv Malhotra (Baker & McKenzie)
	L Badri Narayanan (Lakshmikumaran & Sridharan)		Rohit Jain (ELP)		Ketan Dalal (Katalyst Advisors LLP)
	Vinay Sethi (Thomson Reuters)		Rakesh Nangia (Nangia and Co. LLP)		Milind Kothari (BDO India)
	K.R. Sekar (Deloitte Haskins & Sells LLP)		Suresh Nandlal Rohira (Grant Thornton India LLP)		Maulik Doshi (SKP Business Consulting LLP)

BEPS AND BEYOND... THE DAWN OF A NEW ERA

Conclave Speakers

	Mayra O. Lucas Mas (Advisor at OECD)		Belema Obuoforibo (IBFD)		N. Venkataraman (Senior Advocate)		Ajay Vohra (Senior Advocate)
	Rohan Shah (Advocate)		Mukesh Butani (Founder, BMR Legal)		Max Qiu (Director – Direct Tax, Asia Pacific, Eaton)		Gautam Doshi (Reliance Group)
	Vaibhav Sanghvi (Tax Director, Asia Pacific & Japan, Symantec)		Mohd Haroon Qureshi (Head of Tax - Asia Pacific, Genpact)		Pallavi Bakhru (Group Head of Tax, Vedanta Ltd)		Manish Agarwal (Global Tax Head, Bharti Airtel)
	T. P. Ostwal (Member, UN Committee on Transfer Pricing)		Premkumar Baldewsing (IBFD)		Padamchand Khincha (International Tax Expert)		P. V. Srinivasan (Corporate Advisor)



Mr. Pascal Saint-Amans
(Director, OECD Centre for Tax Policy and Administration)

"BEPS is now spread all over the world, more than 95% of world economy has committed to implement BEPS".

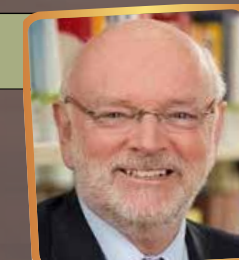
Conclave Agenda

The 3 days action-packed conclave shall discuss contemporary trends in the fields of International Tax Policy, Transfer Pricing and GST. The conclave shall enlighten and engage the delegates in intense deliberations on some of these topics:

1	MLI Revolution - A Step Towards Tax "Peace" / 5 Key Impact Areas	
	<ul style="list-style-type: none"> Legal challenges for MLI implementation MLI reservations - striking a 'jarring note'? Consequences of MLI withdrawal 	<ul style="list-style-type: none"> Will MLI be the new normal? MLI Impact on Indian treaties
2	Planning Strategies / Structures In The Post-BEPS World	
	<ul style="list-style-type: none"> Inbound and outbound investments and Holding companies Application of Principal Purpose Test and its impact vis-à-vis Indian GAAR 	<ul style="list-style-type: none"> IP & intangibles What is left for planning strategies? Impact of BIPA
3	P2 Risks - PE & POEM	
	<ul style="list-style-type: none"> PE - the definitional challenge Managing PE risk & Evaluating change risk profiles post BEPS Action 7 Practical risk management strategies 	<ul style="list-style-type: none"> PE profit attribution Trends in Court rulings on PE POEM consequences
4	Tax Technology - The New Disruption	
	<ul style="list-style-type: none"> What innovations are being introduced/ planned by <ul style="list-style-type: none"> ❖ Companies ❖ Tax administrations ❖ Advisors ❖ Solution providers 	<ul style="list-style-type: none"> Role of technology in tax, including Direct and Indirect Is Data Analytics likely to play a major role in tax management & administration? GST – A live example of tax and technology interplay Is automated tax auditing the road ahead?
5	Tax Disputes Strategies - Are You Ready For The 3 AM Call ?	
	<ul style="list-style-type: none"> 3 things tax head should do when dispute hits the business Organising Internal team/ resources Appointing/engaging the external accountants Managing negotiations 	<ul style="list-style-type: none"> Managing payment demands Managing litigation Appointing/engaging the counsel Assessing financial risk and financial statement impact Managing external communication

BEPS AND BEYOND... THE DAWN OF A NEW ERA

6	Changing TP Landscape - Finding The Sweet Spot	
	<ul style="list-style-type: none"> Impact of BEPS Action Plan 8-10 Gearing for changing landscape of TP audits in India Secondary adjustments & thin capitalization rules 	<ul style="list-style-type: none"> Eased Safe Harbour rules – is the safety net attractive enough? Learnings from international TP rulings (Chevron, Apple, Amazon)
7	GST Chessboard - The Queen's Gambit	
	<ul style="list-style-type: none"> Changes in market practices Adapting to the new regime – retailers vs. wholesalers & manufacturers Reverse charge vs. forward charge under GST law Impact of anti-profiteering provisions 	<ul style="list-style-type: none"> Taxability of intra-company supplies : employer-employee transactions Supplies to & from SEZs – procedures, reverse charge and restriction on trade Impact on incentives under Foreign Trade Policy GSTN - The IT backbone, Role of Technology
8	CBCR & Automatic Exchange Of Information	
	<ul style="list-style-type: none"> How is the CBCR information intended to be used? What is the corporate concern about confidentiality? EU – Public CBCR Proposals & Should CBCR data be published openly? How will politicians, journalists, NGOs, investors use this information to achieve their objectives? 	<ul style="list-style-type: none"> How are companies dealing with producing the report? Analysis of Indian CBCR rules Automatic information exchange framework – a reality in 2018 & its impact on business
9	How Companies Are Re-writing Inter-company & Third Party Agreements In Post-BEPS, GAAR World?	
	<ul style="list-style-type: none"> Best practices in managing contractual documentation Impact of BEPS changes on fragmentation of contracts 	<ul style="list-style-type: none"> Fragmentation of contracts or arm's length companies operating within their area of expertise? Emerging trends in tax clauses in third party contracts
10	Competent Authority Perspective	
	<ul style="list-style-type: none"> Are we expecting a massive increase in MAP & APA requests? If so, how are they going to be handled by the tax administrations? Would arbitration help achieve resolution/ efficiency? Would ADR/mediation be more acceptable to the administrations? How can corporates deal with an MAP/APA case – what resources are needed? Update on BEPS minimum standard implementation on MAP 	



Mr. Jeffrey Owens
(Former OECD Tax Policy Director)

"I think CbC is one of the game changers of BEPS in terms of changing behaviour. This was probably the most important BEPS Action Plan and it (CbC) is a good thing... because if MNCs want to get more trust from politicians and citizens then they need to be more transparent."



Conclave Workshop:

Do not miss out on our special full day workshop on **Thursday, October 5**. The workshop shall feature well known tax experts who shall throw light on the finer aspects of several complicated tax issues.

Workshop Topics:

1. Implications of the MLI's PPT/ Simplified Limitation of Benefits Clause Provisions
2. Indian M&A Landscape: The BEPS Dimension
3. 360° Perspective on Inbound EPC Contracts
4. Recent Rulings on Royalty, FTS and PE
5. Tax Litigation - A Revenue Perspective

Conclave Structure:

The Conclave shall be structured with panel discussions around the above topics. The structure of the panel will ensure an all-round coverage with speakers from industry, tax consultants, IRS. The time available for each panel shall be between 75-90 minutes.



BEPS AND BEYOND... THE DAWN OF A NEW ERA

Conclave Dates:

October 5th, 6th & 7th, 2017

Delegate Registration:

The Taxsutra Conclave aims to see the participation of 250 Tax Heads and CFOs, who shall be extended complimentary-delegate passes. CFOs & Tax Head of Corporates can send their request to conclave@taxsutra.com from their official email address with the following details: Name, company name, designation, mobile number and your official email ID. You shall receive a confirmation mail from Taxsutra team.

Advisors, Counsel, Consultants, other Executives and all those in Private Practice can also attend.

Get in touch with our Events team at: events@taxsutra.com or call Fahad Khan @ 91-9920934596

Conclave Venue:

The beautiful setting of the Oberoi at Gurgaon in the NCR region - voted as Asia's Leading Luxury Hotel Brand in 2017, shall serve as the backdrop as we welcome eminent Indian and international speakers and 250 corporate tax heads & CFOs.



PRESENTS



5th, 6th & 7th OCTOBER
THE OBEROI, GURGAON

BEPS AND BEYOND... THE DAWN OF A NEW ERA

Conclave 2016 In Pictures



PRESENTS



Platinum Partner

Deloitte.

Gold Partner



Silver Partners

**Baker
McKenzie.**



Bronze Partners



Associate Partners



Premium Partner



Publishing Partner



Supporters



Taxsutra Edge:

Over the last 6 ½ years, Taxsutra has been delivering the fastest Tax news, insights and commentaries with unquestionable accuracy and unrivaled speed. Taxsutra is the leading B2B tax portal based out of India and its thought leadership has been reflected in a series of cutting edge Editorial Insights, specifically its coverage on BEPS, APA, IFA Congress, Vodafone tax case, Union Budgets, Soccer & Tax microsite, etc. Taxsutra reaches out to the who's who of the tax world that includes over 7000 Tax professionals in India, leading MNCs, several hundred Corporate Tax Heads, senior Government officials and overseas Tax professionals.

