



International Fiscal Association

Southern Regional Chapter – India Branch

10th International Taxation Conference 2016

on “International Taxation - Dawn of a New Era”



05th FRIDAY & 06th SATURDAY,
AUGUST 2016

at **Hotel Hyatt Regency** - Anna Salai, Chennai

Event Sponsor


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ABOUT THE CONFERENCE :

Given the massive globalization epoch wave that is on and with geographies shrinking rapidly to accommodate more businesses, it is imperative to take a reality check as to whether International tax rules have kept pace with the frenetic evolution of multinational businesses. The Organization of Economic Co-operation Development (OECD) on its part has over the last few years taken gargantuan steps on aligning the global taxation rules with the dynamic evolution of multinational businesses. From the Indian perspective, with India becoming an active key Partner of the OECD and participating on equal footing with the OECD members on its significant tax projects, India appears to be pro-active in introducing tax principles which align with the global tax system. With this background, the Southern Regional Chapter – IFA India Branch, Chennai is organizing a two-day international tax conference centered on the theme “International taxation – Dawn of a New Era”. The two day conference will focus on the major developments happening on the international tax front and analyze on how introduction of global tax principles in Indian context will have its relevance to businesses pertinent to current day scenario.

This conference shall widely cover various aspects and updates on the BEPS project of the OECD, Transfer Pricing, GST– International Practices, etc., The agenda of the conference has been elucidated below:

DAY 1: FRIDAY, AUGUST 5TH 2016

SESSION I - Taxing digital economy: Challenges in the equalization levy and the proposed GST

This sunrise sector occupies a central position in tax debates and discussions. Over a decade and more, tax professionals and Governments have been mulling over the taxation of e-commerce transactions. Given the predominance of this industry, with large amounts of investments flowing into this sector, it would be important to discuss the issues arising in this sector, the manner in which the Government seeks to deal with this sector and also to deal with the challenges faced by this sector in local taxation such as VAT, GST and entry tax. The conference would be a fine blend of presentations, case studies by eminent speakers on the subject and shall allow for a healthy debate among all the participants.

SPEAKERS:

Mr VIJAY IYER, Partner & National Leader Transfer Pricing, Ernst & Young.

Mr Vijay Iyer leads the Transfer Pricing practice at EY India. With an experience spanning to nearly two decades, Over the past eleven years, he has focused on Transfer Pricing as his area of specialization and has serviced a large number of multinationals operating in India. He is actively involved in Transfer Pricing Litigation, both as an arguing counsel and as an advisor assisting clients in devising their litigation strategy.

Mr B SRIRAM, Partner – Indirect Taxes, Ernst & Young, Chennai.

Mr. Sriram is an Indirect Tax Expert and Partner at Ernst & Young, Chennai. He specializes in Indirect Tax consultancy, structuring, representation and compliance engagements for various MNC's and Indian companies alike. He has more than 23 years of experience with specialisation in Customs Valuation, EPC contract structuring, diagnostic review with focus on opportunities identification and tax modelling studies.

SESSION II - Moot Court on Transfer Pricing Disputes

A novel session on arguments for both the taxpayer side and revenue's side would be presented on the following topics where most litigation has been witnessed in the recent times. Let's debate this out.

- ◆ Is real income relevant for transfer pricing? ◆ Can AMP never be international transaction?
- ◆ Outbound Guarantee – Is retrospective amendment not relevant?

PANEL :

Mr PRADEEP PARIKH, Retired Honourable Member of the Income Tax Appellate Tribunal.

Mr PP Parikh retired as the Honourable Vice President of Income Tax Appellate Tribunal, ITAT, and Chennai & Hyderabad Bench. He has been party to several landmark judgements such as R. M. Valliappan 103 ITD 63 (Che) (SB), Narang Hotels 74 ITD 190 (Mum) (SB), Smt. Mahesh Batra 95 ITD 152 (Asr) (SB) among other. He is a qualified Chartered Accountant.

Mr B RAMAKRISHNAN, Partner – CNGSN Associates & LLP Chennai.

Mr. B. Ramakrishnan is a renowned tax expert in South India and also a partner at CNGSN, Chennai. He handles appeals in Direct Taxes upto the Tribunal stage. He also handles complex search and seizure cases, before the Settlement Commission (Income Tax & Wealth Tax). He specializes on matters relating to prevention of money laundering.

Mr T BANUSEKAR, Partner, CRBS & Co Chartered Accountants, Chennai

Mr Banusekar is a familiar face in the tax circles. He is the partner of M/s C Ramaswamy & B Srinivasan Chartered Accountants, Chennai. With more than twenty years of experience in advising clients on complex direct tax and international tax issues, he has represented on behalf of various assessee's in the Income Tax Appellate Tribunal and has set many numerous landmark judgements. He is presently the Chairman of the Direct tax committee of the Hindustan Chamber of Commerce.

Mr SHAJI P JACOB, Indian Revenue Service (IRS), Income Tax Department.

Mr Shaji P Jacob, is an Indian Revenue Service (IRS) officer and is currently the Additional Commissioner of Income Tax, Corporate Circle (6). He has successfully represented for the Revenue for various matters at the Income Tax Appellate Tribunal.

** Confirmation Awaited*

SESSION III - Managing transfer pricing challenges in today's dynamic business scenario

A case study on manufacturing sector - Developing a sustainable transfer pricing strategy in a dynamic manufacturing scenario involves several aspects around, Research & Development, manner in which royalties are structured, cross charge of management support services, issues around loans and financial guarantees, emerging aspects around business restructuring and related exit charges. This session would provide a case study on how various aspects interplay in an effective transfer pricing strategy.

SPEAKER :

Mr KUNJ VAIDYA, Partner - Price Waterhouse & Co. LLP

Mr Kunj Vaidya is the transfer pricing dispute resolution lead for PWC India. With over a decade of experience in providing quantitative and strategic analyses to companies in establishing pricing policies, particularly in the US, Australia and India, he specialises in transfer pricing audit defence and litigation, APAs, planning studies and global documentation. He has extensive experience in assisting companies with unilateral, bilateral and trilateral APAs - including coordination and negotiation with competent authorities in the US, Australia, Japan, Germany, UK, Canada and India.

SESSION IV - Panel Discussion on Advance Pricing Agreement (APA) and Mutual Agreement Procedure (MAP)

To counter a regime of uncertainty in tax, particularly in transfer pricing, we have witnessed, proactive measures from the Government introducing APAs. The initial experience of tentativeness around the regime has improved into positive optimism. This session would deal with the following:

◆ Need for APA/ strategies o Roll back or not? ◆ Flexibility of APA ◆ MAP Vs Litigation

PANEL:

*MR SANJEEV SHARMA, Commissioner of Income Tax, APA**

Mr. Sanjeev Sharma is the Commissioner of Income Tax, in the Advance Pricing Arrangements Department. He also has experience of exclusively handling International Tax cases at the Income Tax Appellate Tribunal, New Delhi. He has also served as the Secretariat of CTPA, OECD for over 39 months during which period he handled the OECD work in the area of tax transparency and exchange of information, which led by the Global Forum on Transparency and Exchange of Information for Tax Purposes. He also has experience of exclusively handling International Tax cases at the Income Tax Appellate Tribunal, New Delhi. He is an IITian, with a Masters in International Law from Vienna University of Economics and Business Administration with a degree on global governance in German Development Institute.

** Confirmation awaited.*

Mr VIJAY IYER, Partner & National Leader-Transfer Pricing, EY India.

Mr Vijay Iyer leads the Transfer Pricing practice at EY India. With an experience spanning to nearly two decades, Over the past eleven years, he has focused on Transfer Pricing as his area of specialization and has serviced a large number of multinationals operating in India. He is actively involved in Transfer Pricing Litigation, both as an arguing counsel and as an advisor assisting clients in devising their litigation strategy.

Mr N MADHAN, Partner, PriceWaterhouseCoopers P Ltd.

Mr Madhan is the Tax Partner at PwC, Chennai. He is current responsible for the Chennai tax practice of PwC. Apart from his leadership role, his functional expertise lies on Corporate Tax and Transfer Pricing. He has advised and assisted various MNC's on complex tax structuring and regulatory matters.

Mr AMEYA KUNTE, Executive Editor and CO-founder Taxsutra

Mr Ameya Kunte is the Executive Editor and Co-Founder Taxsutra. He specialises in Indian income tax, international tax and exchange control laws. Prior to his entrepreneurial stint, he has worked in international consulting firms such as Ernst & Young and PriceWaterhouseCoopers P Ltd. (PwC) for over 7 years and has been a tax advisor to many Indian and multinational companies.

SESSION V - Global Economy – crystal ball gazing!

When the Global economy is volatile, with Brexit becoming a massive blow to EU, with the markets being in a tizzy, what does the global economy holds out for us? This session would be an interesting dialogue on the global economy, trends and expectations and where India stands. Tax isn't everything for industry and professionals, is it?!

SPEAKER :

Dr PT RAJAN, Former Managing Director, Global Capital Markets, Standard Chartered Bank, Singapore

Dr Rajan, holds a Ph.D in Human Factors Engineering / Engineering Psychology at State University Of New York, Buffalo. He

He began his career in 1990 as an Independent Consultant in Operations and Systems Improvement. He then joined Lehman Brothers Holdings Inc. in the year 2001 as Trader and Co-Portfolio Manager - Firm Relationship Loan Portfolio. He quit Lehman Brothers Holdings Inc. as Head Of Offshore Capital Markets in the year 2008. He then worked for Standard Chartered Bank, Singapore in the Global Capital Markets division. Dr Rajan was recently elected as Member of Legislative Assembly to the Tamilnadu Legislative Assembly having contested from Madurai Central constituency.

DAY 2-AUGUST 6TH 2016, SATURDAY

SESSION VI - GST – What the Law beholds?

GST, redefines the taxing system for supply of goods and services. A legislation, which is game changing and promises to deliver seamless credit for taxes. Apart from being a tool for taxation, it is also described as a tool to pump up efficiencies in business and deliver revenues to poorer consuming States. What does this behold for the industry and professionals? An insight into this would be important. This session would deliver an insightful analysis into this new legislation.

SPEAKER :

Mr SIVARAJAN K, Partner –Indirect Taxes, Price Waterhouse & Co. LLP

Mr Sivarajan is a recognized indirect tax specialist, is a partner for Indirect taxes with Price Waterhouse & Co LLP. He leads the firm's indirect practice in Chennai. He has over 20 years of experience in advising clients on indirect taxes specifically on service tax, VAT and GST.

SESSION VII - General Anti Avoidance Rules -the Sweep, its impact and preparedness

GAAR is a dreaded law. It could be a nightmare for taxpayers. Such is the sweep and its impact.

◆ Can we be prepared at all? ◆ How much trouble could this legislation create for corporates? ◆ What are the broader aspects to be borne in mind, in being prepared for this new regime?

This session would provide an analysis of the provision, its potential reach and also some broad do's and don'ts for the regime.

SPEAKER :

Mr KK CHYTANYA, Advocate

Mr Chytanya is a practicing advocate based out of Bangalore, India. He has more than 20 years of experience in advising clients on International tax and Corporate tax issues. He is instrumental in various landmark judgements under the Income tax appearing for assesses at the Income Tax Appellate Tribunal and the High Court's. He is a renowned and sought after speaker on International tax in various circles and forums across the Country.

SESSION VIII - Cross border taxation of partnership firms and Trusts

Taxation of Partnerships and Trusts has been a fascinating area in international taxation. The differences in tax treatment between jurisdictions pose challenge for partnerships. Interestingly, with the FDI into LLP gaining significance and Indian law treats the LLP on par with partnerships, it would be important to analyze the taxation of partnership firms. Further, trusts occupy a significant role in private equity, wealth management and various other strategic structuring aspects too. This fascinating area would also be analyzed in detail in this session.

SPEAKER :

Ms SHREYA RAO, Advocate, Rao Law Chambers

Ms Shreya Rao is the founder of Rao Law Chambers, a boutique chambers style practice focusing on international tax advisory & litigation, cross-border matters and succession and wealth planning issues. In her previous stint, she was the head of the private wealth practice and co-head of the tax practice at Nishith Desai Associates. She is an alumna of NALSAR and Harvard Law School.

SESSION IX - Intellectual Property and International Structuring

IP drives value in many global corporations and housing of the IP in a favorable tax jurisdiction, as a practice, has come under scanner, particularly in the context of global corporations, with far flung operations. This session would cover the various favorable jurisdiction to house IP, the emerging issues in migration of IP and also disputes arising from these transactions.

SPEAKER :

Mr PV SRINIVASAN, Tax Consultant & Corporate Advisor

Mr PV Srinivasan is a Chartered Accountant and is engaged as a Corporate Advisor, advising leading business houses on global taxation and corporate law matters. He has over 30 years of hands on experience in manufacturing and information technology industries with regard to corporate tax compliances across tax jurisdictions in India, USA, Europe, Africa and Asia-Pacific addressing structuring requirements, cross border mergers, demergers, transfer pricing, taxation of IPR's, Indirect taxes and personal taxation.

CONFERENCE FEES & RSVP

	Early Bird (on or before 23 July 2016)	Non-IFA Members (on or after 24 July 2016)
IFA Members	INR 5750	INR 6325
Non-IFA Members	INR 6900	INR 7475

❖ *Fee is inclusive of Service tax, Swachh Bharat Cess & Krishi Kalyan Cess.*

❖ *Registration will be confirmed only on receipt of delegate fee. The fee paid is non-refundable. However the substitution of the delegate/s is/are allowed.*

❖ *Please send the Registration forms along with the Cheque / DD payable in Chennai in favor of "INTERNATIONAL FISCAL ASSOCIATION IB SRC" to the following address International Fiscal Association, C/o Chartered Accountants study circle, 2-L, Rear Block, 2nd floor, 22-S Cathedral Road (Next to Stella Maris College), Chennai-600 086.*

Contact : Mr. Radhakrishnan, M : 9444155595

For further details and RSVP

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IFA Executive Committee Member

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International Fiscal Association

Southern Regional Chapter - India Branch

2-L, Prince Arcade (Rear Block), 22-A, Cathedral Road, Chennai 600 086



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ENROLMENT FORM

10th International Taxation Conference 2016

Theme: "International Taxation – Dawn of a New Era"

Friday & Saturday: 05 & 06 August, 2016

	Member	Non Member
Name (Mr./Mrs./Ms.)		
Age :		
DoB :		
Firm / Organisation		
Designation :		
Mailing Address :		
Academic / Professional Qualification		
*(Applicable for Non-members only)		
Contact Information		
Phone : Resi :		
Office :		
Mobile :		
Email :		
PAYMENT DETAILS		
Cheque / Draft / Online Transfer		
Date :		
Cheque No./ Draft No./ NEFT		
Reference Code :		
Bank Name :		
Amount (Rupees in Words) :		

I understand and acknowledge that:

- In the event of my inability to attend the Conference for any reason, I will promptly inform the Committee and will not substitute any other person to attend the Conference in my place. I understand that the Committee reserves the right not to admit any person to the Conference in the event I substitute him/her in my place.
- Claim for refund will not be entertained.

DATE :

SIGNATURE

DELEGATE FEE SCHEDULE		
	MEMBER	NON MEMBER
Early Bird Registration (Valid till 15 July 2016)	Rs. 5,750	Rs. 6,900
Spot/ Regular Enrolment (From 16 July 2015)	Rs. 6,325	Rs. 7,475
NOTE : <ul style="list-style-type: none">● The above fees are inclusive of service tax @15%● Cheque/ Draft shall be issued in favor of International Fiscal Association IB SRC , payable at Chennai.● Participants availing early bird registration are requested to submit their enrolment forms to the Administrative Office on (or) before 15 July 2016.● Members making payment through online transfers are requested to also enclosed the payment confirmation advice along with this enrolment form.● Participants are advised to send the soft copy of filled enrolment forms along with Cheque/Draft (or) Online payment confirmation advice to admin@ifasrc.org		

ONLINE TRANSFER DETAILS :	
Name of Beneficiary	International Fiscal Association-SRC
Nature of Account	Current
Name of Bank	State Bank of India
Account Number	00000010061101334
IFSC CodeBranch	SBIN0002190
Branch	Alwarpet, TTK Road (Chennai)
Please send the physical copy of the enrolment forms along with the Cheque/Draft (or) Online payment confirmation advice to our Administrative Office at: International Fiscal Association – IB-SRC C/o. Chartered Accountants Study Circle , 2-L, Prince Arcade (Rear Block), 22-A, Cathedral Road, (Next to Stella Maris College), Chennai 600 086.	

FOR ANY QUERIES CONTACT :			
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