TAXSUTrA ALP
SUMMIT 2017
A 360°
PERSPECTIVE
ON THE WORLD OF
TRANSFER PRICING
JUNE 8, 2017
FOUR SEASONS HOTEL, WORLI, MUMBAI
Indian transfer pricing law has evolved substantially since its inception in 2001. While the transfer pricing litigation landscape has matured over the years from basic, procedural issues (e.g., use of multiple year data, computation of arithmetical mean, etc.) to more complex issues like location savings, marketing intangibles, management fees, etc., yet many of these issues are still awaiting resolution at the doors of the Indian Courts.

Indian TP landscape offers us ample scope for discussion on Transfer Pricing. As Transfer Pricing occupies the center stage both in India and overseas, the ALP Summit will once again endeavour to bring together TP specialists as also Government officials to converse with Corporate Tax Directors and CFO’s on emerging trends.

Why attend the Taxsutra ALP Summit?

Arm’s Length Pricing – Taxsutra TP Summit 2017

Why? Thought leadership on carefully designed technical-subject panels

Discussion on Emerging Transfer Pricing trends and experiences & insights of tax policy-makers

Interact with Policy-makers, revenue officials, industry representatives, top tax experts and counsels

1. TP 2020 – The future of Transfer Pricing

The world of transfer pricing is being redefined by BEPS and other OECD / UN-led projects, with various transformations likely as the year 2020 approaches. This "futurology panel" will bring together tax experts to share their views on how the international transfer pricing landscape might look like in a not too distant future. The tax experts will look at what principles are likely to survive and why, and which ones are likely to be abandoned.

2. Revised TP-assessment procedure – Impact on TP litigation lifecycle

While there is no stopping new TP-controversies from brewing, it must be appreciated that the Indian Govt. has taken steps to revamp the TP-assessment procedure keeping in perspective the combined objectives of reducing avoidable litigation, providing certainty to taxpayers and aligning India’s TP regime with global best practices. This Panel will discuss practical experiences from the revised TP-assessment procedure and elaborate on its impact on the TP litigation lifecycle.

3. APA closures – A turning point in TP litigation landscape?

In this ever-evolving TP litigation landscape, the Indian APA program has been perceived as a “Sigh of Relief” for MNCs to bring tax certainty in their business. As we celebrate the successful completion of 5 years of the Indian APA program (July 1, 2012 to March 31, 2017) with the signing of a whopping 152 APAs, tax experts will reminisce about the APA journey in the last 5 years and also discuss about the evolving post-APA landscape.

4. CbCR and TP transparency – Standing up to scrutiny?

India has been a strong supporter of the “transparency” agenda in OECD’s BEPS project and hence has been at the forefront of the implementation of Action item 13 on Country by Country Reporting (CbC) starting FY 2016-17. With the first round of CbCR filings due by November 30, 2017, this Panel will discuss the minefield of challenges that the reporting template opens up practically and the impact that this reformatory regime has for both MNCs as well as the tax administration.
5. Transfer Pricing and Value Creation – The new dawn

One of the key aims of the BEPS project is to ensure that the profits of multinationals are taxed where the value is created. Not only do businesses need to understand where the value is created, but critically they also need to explain it to various groups of stakeholders – whether this is in the master file or CbC reports for transfer pricing, in vendor due diligence or in public statements on tax policy. In this Panel, tax experts will discuss the recent developments in the area of value chain reviews in the backdrop of BEPS Actions 8-10 and provide guidance on how to get the most out of a value chain project.

6. BEPS Action Plan 7 and PE attribution using transfer pricing – Back to the future!

Attribution of profits to a permanent establishment (PE) is one of the most intricate issues in TP and international taxation. Recently, OECD’s discussion draft on attribution of profits to PEs under BEPS Action 7 reiterated the concept of “functionally separate entity approach”, rather than a formula apportionment. Given India’s reservation on such approach, this Panel will deliberate on strategies to work around the PE attribution ‘chakravyuh” using TP principles.

7. Impact of GST/ Ind-AS on Transfer Pricing – The Big Picture

There has never been a dull moment for the Indian corporate community with rapidly changing laws in the accounting and tax landscapes keeping them on their toes. With implementation of Ind-AS already underway for certain companies and GST on the anvil, this is probably the busiest time yet for corporates as they meander through a maze of bottlenecks and challenges to stay afloat on tax & accounting boat. This Panel will provide insights on the impact these other important developments have on the transfer pricing landscape.

8. GAAR and TP Overlap – Case studies

Given that GAAR provisions have become effective from April 1, 2017 its interplay with TP provisions is both an interesting and debatable topic. The metamorphosis of the arm’s length price (ALP) might work towards increasing the number of cases where the application of TP rules and GAAR would overlap, as it will not only increase the number of transactions that come under the scope of the TP rule but also elevate the need for re-characterizing a larger number of actual transactions into the alternatives for the purpose of calculating their ALP. This Panel will discuss case studies on GAAR vs. TP overlap and the way forward in such scenarios.

SUMMIT SPEAKERS

- Akhilesh Ranjan (Principal GST - International Tax & Transfer Pricing)
- Ashish Kumar (APF Commissioner)
- Kamlesh Varshney (CIT, International Tax)
- Zara Ritchie (Head of Global Transfer Pricing Services, BDO)
- Shefali Goradia (BMR & Associates LLP)
- Ajay Kumar (BDO)
- Vishweshwar Mudigonda (Deloitte Haskins & Sells LLP)
- Sanjay Kumar (Deloitte India)
- Milind Kothari (BDO)
- Karishma R. Phatarphekar (BMR & Associates LLP)
- Renu Narvekar (TCS)
- Bela Sheth-Mao (Shell India)
- Radhika Kamat (Deutsche Bank)
- Rupak Saha (PwC)
- P. V. Srinivasan (Corporate Advisor)
- S. Gayathri (Essar Group)
- Andrew Fairfoull (PwC)
- Karishma R. Phatarphekar (BMR & Associates LLP)
- Renu Narvekar (TCS)
- Bela Sheth-Mao (Shell India)
- Radhika Kamat (Deutsche Bank)
- Rupak Saha (PwC)
- P. V. Srinivasan (Corporate Advisor)
- S. Gayathri (Essar Group)
Delegate Registration
CFOs & Tax Head of Corporates can send their request for complimentary delegate passes to events@taxsutra.com, from their official e-mail address with the following details: Name, Company name, designation and mobile number. You shall receive a confirmation e-mail from Taxsutra team at the earliest.

Advisors, Counsels, Consultants, Other Executives and all those in Private Practice can also attend. Early bird rates available – please get in touch with our Events team at: events@taxsutra.com or call Fahad Khan @ 91-9920934596

SUMMIT VENUE
Four Seasons Hotel, Worli

SUMMIT TIMING
8.00 am to 6.00 pm

Moments From Taxsutra ALP Summit, 2016
Taxsutra Edge:

Over the last 6 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 projects, 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 6500 tax professionals in India, leading MNCs, several hundred Corporate Tax Heads, senior Government officials and overseas tax professionals.

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