

6th

**TAXSUTRA
CONCLAVE**

3 - 5 May 2023

THE OBEROI, GURGAON

**OECD'S TWO-PILLAR SOLUTION:
ARE THE PILLARS STRONG?**



CONCLAVE PARTNERS

Platinum



Gold



Silver



Knowledge Partner

Supporter



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Think Compliance, Think Fast Facts

WELCOME NOTE

Taxsutra conclave 2023 - OECD's Two-Pillar Solution: Are the Pillars Strong?

- "A journey of a thousand miles begins with a single step," so is the starting point for global tax deals that commences with **OECD's** two-pillar solution. The **OECD's** two-pillar solution is a path-breaking framework designed to address the challenges posed by the digitalization of the global economy.
- The two-pillar solution is only the first step on a long and challenging journey toward a more equitable and sustainable international tax framework. Implementing these reforms requires collaboration and cooperation among nations, as well as an ongoing dialogue with stakeholders from across the globe.
- As we embark on this transformative journey towards a fairer tax system, we proudly announce the 6th edition of the **Taxsutra Conclave** following the overwhelming success of the previous editions. This edition promises to be an enthralling affair, featuring a star-studded line-up of speakers sharing their insights on the latest international tax developments over 3 exceptional days of technical sessions. From the taxation of the metaverse and digital assets to the intricacies of indirect transfers, beneficial ownership, and anti-abuse rules in tax treaties, the **Taxsutra Conclave** promises a rich piece of technical deliberations & networking opportunities.

WHY ATTEND THE TAXSUTRA CONCLAVE?

Thought leadership on carefully designed technical- subject panels.

Hear from tax policy-makers, tax experts & tax administrators.

Interact with 250 Tax Heads & CFOs.

CONCLAVE SPEAKERS



Dinesh Kanabar
 Dhruva Advisors LLP



Sanjay Tolia
 Price Waterhouse & Co LLP



V. Lakshmikumaran
 Lakshmikumaran & Sridharan (L&S)



Mike Williams
 Director, Business and International Tax, HM Treasury



Philip Baker
 King's Counsel



ASG N. Venkataraman
 Senior Advocate



Akhilesh Ranjan
 Advisor, Price Waterhouse & Co LLP



Girish Vanvari
 Transaction Square



Uday Ved
 KNAV



Porus Kaka
 Senior Advocate



Ajay Vohra
 Senior Advocate



Rasmi Ranjan Das
 Joint Secretary (FT & TR), Ministry of Finance



L. Badri Narayanan
 Lakshmikumaran & Sridharan (L&S)



Rohan Shah
 Advocate



Mukesh Butani
 BMR Legal



Kamlesh Varshney
 Joint Secretary (TPL I), Ministry of Finance



Indra Anand
 Tata Sons



Shreeram Deshpande
 Shell



Rohit Jain
 Economic Laws Practice (ELP)



Nabin Ballodia
 BDO India



Vaibhav Gupta
 Dhruva Advisors LLP



Padamchand Khincha
 International Tax Expert



Dhiren Shah
 Adani Group



P. R. Ramesh
 Independent Director



S. Vasudevan
 Lakshmikumaran & Sridharan (L&S)



Jitendra Jain
 Price Waterhouse & Co LLP



Mehul Bheda
 Dhruva Advisors LLP



P. V. Srinivasan
 Corporate Advisor



Navin Jain
 DIAGEO India



M.S. Vasan
 Hinduja Global Solutions Ltd

CONCLAVE SPEAKERS



Govindraj Ethiraj



Mohd Haroon Qureshi
 Genpact



Nisha Gupta
 Honeywell



Ajay Agarwal
 Vedanta



Divya Gupta
 InterGlobe Enterprises



Nishant Shah
 Economic Laws Practice (ELP)



Aakash Uppal
 BDO India



E N Dwaraknath
 Price Waterhouse & Co LLP



Parul Jain
 Nishith Desai Associates



Gautam Doshi
 Chartered Accountant



K. R. Sekar
 Chartered Accountant



K. Vaitheeswaran
 Advocate



Dr. M. R. Venkatesh
 Advocate and Economist

AGENDA

CONCLAVE AGENDA

THE NEW WORLD OF RESPONSIBLE AND AUTOMATED TAXES

- ESG in taxation (Social accountability, suo-moto reporting, contentious tax positions)
- Tax Transparency - Role of technology in tax transparency and real time tracking (EOI, GST/TP/Customs interplay, CbCR and MF data)
- Use of data analytics and Technology – Used by government and also a mode to manage stakeholder expectations for tax function in a cost-efficient manner
- Way forward for companies - Social Accountability and reporting using technology

TWO PILLAR SOLUTION - DEVELOPING ECONOMY'S PERSPECTIVE

- Are the Rules biased in favour of UPE jurisdiction?
- Assessing 'Subject to Tax Rule' (STTR) benefits for developing economies
- Impact of Qualified Domestic Minimum Top-Up Tax (QDMTT)
- Elimination of tax competition under Global Minimum Tax - impact on FDI
- Capacity building costs

MNC TAXATION - CURRENT AND ANTICIPATED TRENDS

UNTANGLING THE TAX WEB OF THE VIRTUAL UNIVERSE

- Significant Economic Presence and Equalization Levy 2.0 applicability to Metaverse platforms and operators
- Virtual world of Web 3.0 - Determining residential status, situs of income, and jurisdiction of tax authorities
- Issues in income characterization
- How to value virtual assets?

OECD PILLAR TWO ALONGWITH BEPS - FOCUS ON US INBOUND - IMPACT ON TRANSFER PRICING

CONCLAVE AGENDA

TREATY ANTI-ABUSE RULES AND INTERPLAY WITH GAAR

- Differences and similarities between PPT and GAAR
- GAAR impact on treaty entitlement
- Hierarchy between PPT and LOB
- Article 6 of MLI - Impact of the new Preamble
- Tax planning post BEPS and GAAR

BENEFICIAL OWNERSHIP IN INTERNATIONAL TAXATION – EVOLVING TRENDS

- Diversity in interpretation - Art 3(2) OECD MC directs to domestic law definitions
- Guidance from OECD commentary
- Does BO test apply to all articles of a tax treaty?
- Landmark rulings across the globe
- Interplay of BO test with GAAR and PPT

TAXATION OF INDIRECT TRANSFERS

- Impact of Article 9 of MLI on taxation of indirect transfers
- Can PPT be invoked to deny indirect transfer benefit?



AGENDA

- Learnings from the Sanofi Pasteur ruling
- Revoking of retrospective application under Section 9 of Income-tax Act

TAX INVESTIGATIONS - THE NEW NORM

OUTBOUND STRUCTURES AND ISSUES

- IP related issues
- Hold Co structures/jurisdictions and issues
- WHT and repatriation issues – What the government is doing and can do in future

BUSINESS IMPERATIVES OF MODERN FTAS

- FTAs – current and pipeline
- Building resilient supply chains and Business Opportunities
- Make in India for the Globe – Closer than earlier due to FTAs?

MAKING INDIA A MANUFACTURING HUB - TAX AND REGULATORY LANDSCAPE



CONCLAVE VENUE

The beautiful setting of the Oberoi at Gurgaon in NCR shall serve as the backdrop as we welcome eminent Indian and international speakers and 250 corporate tax heads & CFOs.



CONCLAVE DATES

May 3, 4 & 5, 2023

DELEGATE REGISTRATION

The Taxsutra Conclave aims to see the participation of 250 Tax Heads & CFOs, who shall be extended complimentary delegate passes. CFOs & Tax Heads 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 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: conclave@taxsutra.com or call Kalpana K @ 91-98200 47188

TAXSUTRA EDGE

Over the last 12 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 10,000 tax professionals in India, including MNCs, several hundred Corporate Tax Heads, senior Government officials and overseas Tax professionals.



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Office No. 2-5, First Floor, Lokmanya House, Lokmanya Colony, Paud Road Kothrud, Pune - 411 038