

# INTERNATIONAL TAXATION - INDIA TAKES CENTRESTAGE



International Tax Conference  
organized by

## Northern Region Chapter of International Fiscal Association - India Branch

Hotel Shangri-La, New Delhi

February 10-11, 2012

### FINAL PROGRAMME

**Friday, February 10, 2012**

08.45-09.30	Registration
09.30-10.30	<b>Inaugural Session</b>
09.30-09.40	<b>Welcome address</b> Mr. O.P. Vaish, Hony. President, IFA India
09.40-09.50	<b>Theme Address</b> Mr. Ajay Vohra, Chairman – IFA India Branch
09.50-10.05	<b>Key note address</b> Chairman, Central Board of Direct Taxes*
10.05-10.25	<b>Inaugural address</b> Dr. Montek S. Ahluwalia, Deputy Chairman, Planning Commission of India
10.25-10.30	<b>Vote of thanks</b> Mr. V P Gupta, Chairman, IFA, NRC
10.30-10.45	Tea break
10.45-12.45	<b>First Technical Session – Recent trends in international tax</b>
	<b>Panel discussion on issues, impact and learnings from decisions in cases of Vodafone, Aditya Birla Nuvo, Richter Holdings, etc.</b> <i>Chairman:</i> Director General, International Taxation * <i>Moderator:</i> Mr. Mukesh Butani, BMR Advisors <i>Panelists:</i> Mr. Couldip Lala, International Financial Services, Mauritius Mr. Girish Dave, Advocate Mr. Nishith Desai, Nishith Desai & Associates Mr. Sudhir Kapadia, Ernst & Young Mr. Aseem Chawla, Amarchand Mangaldas
12.45-14.00	<b>Luncheon Session – Education Revolution: Need of the Hour</b> Mr. Vijay K. Thadani, Chief Executive Officer, NIIT Limited*
14.00-15.45	<b>Second Technical Session – Anti- Avoidance Measures</b>
14.00-14.05	<i>Chairman:</i> Mr. G. E. Veerabhadrappe, President, ITAT
14.05-14.35	<b>Interplay/conflict between GAAR and Treaty provisions</b> <i>Speaker:</i> Mr. Al Meghji, Osler, Hoskin & Harcourt LLP, Canada
14:35-15.00	<b>GAAR: Recent Developments in U.K.</b> <i>Speaker:</i> Ms. Heather Gething, Herbert Smith LLP, U.K.
15.00-15.25	<b>Proposed Indian GAAR- Areas of concern</b> <i>Speaker:</i> Mr. T. P. Ostwal, T. P. Ostwal & Associates
15.25-15.45	<b>Proposed CFC Regulations- implications and unintended results</b> <i>Speaker:</i> Ms. Daksha Baxi, Khaitan & Co.
15.45-16.00	Tea break

16.00-18.00	<b>Third Technical Session – Tax Treaty Issues</b>
16.00-16.10	<i>Chairman:</i> Mr. Justice A. K. Sikri, Acting Chief Justice High Court of Delhi*
16.10-16.35	<b>Latest UN developments</b> <i>Speaker:</i> Mr. Michael Lennard U.N. Dept. of Economic and Social Affairs, USA *
16.35- 16.55	<b>Latest OECD developments</b> <i>Speaker:</i> Mr. Joe Andrus, OECD, France
16.55-17.25	<b>Recent significant decisions / developments in international taxation</b> <i>Speakers:</i> Mr. Rupesh Jain, Vaish Associates, Advocates
17.25-18.00	Mr. Pieter de Ridder, Loyens & Loeff, Singapore

## Saturday, February 11, 2012

09.30-11.30	<b>Fourth Technical Session – Transfer Pricing-I (Issues and Controversies)</b>
09.30-09.40	<i>Chairman:</i> Mr. Justice Swatanter Kumar, Supreme Court of India
09.40-10.15	<b>Transfer pricing of intangibles: Methods, approaches and issues</b> <i>Speaker:</i> Mr. Marc Levey, Baker & McKenzie, U.S.A.
10.15-11.30	<b>Panel discussion – Transfer pricing controversies</b> <i>Moderator:</i> Mr. Shyamal Mukherjee, PricewaterhouseCoopers <i>Panelists:</i> Ms. Rashmi Saxena Sahani, DIT (Transfer Pricing)* Ms. Manisha Pande, GE India Mr. S.P. Singh, Deloitte Mr. Sanjiv Chaudhary, KPMG Mr. Neeraj Jain, Vaish Associates, Advocates
11.30-11.45	Tea break
11.45-13.15	<b>Fifth Technical Session – Transfer Pricing-II (Recent Developments)</b>
11.45-11.55	<i>Chairman:</i> Mr. Justice Rajiv Shakdher, High Court of Delhi
11.55- 12.25	<b>Recent Significant Foreign Rulings</b> <i>Speaker:</i> Ms. Heather Gething, Herbert Smith LLP, U.K.
12.25-12.50	<b>Safe harbors and APAs: International Experience</b> <i>Speaker:</i> Mr. Joe Andrus, OECD, France
12.50-13.15	<b>Safe harbors and APAs: Indian Scenario</b> <i>Speaker:</i> Mr. Sanjay Mishra, Joint Secretary (FT&TR-I) Ministry of Finance
13.15-14.30	<b>Luncheon Session – Weeding out the malice of corruption</b> <i>Moderator:</i> Mr. Sukumar Ranganathan, Editor MINT <i>Panelists:</i> Mr. H. K. Dua, Former Press Advisor to the Prime Minister of India and Member of Parliament (Rajya Sabha)* Mr. Justice Manmohan Sarin, Lokayukta, Government of NCT of Delhi Mr. Soli Sorabjee, Senior Advocate Mr. Paranjay Guha Thakurta, Journalist
14.30 – 15.45	<b>Sixth Technical Session – Issues in taxation of unincorporated entities with Foreign participation</b>
	<i>Chairman:</i> Mr. Justice R V Easwar, High Court of Delhi <i>Moderator:</i> Mr. Padam Khincha, H. C. Khincha & Co. <i>Panelists:</i> Mr. Rahul Garg, PricewaterhouseCoopers Mr. Gokul Chaudhri, BMR Advisors Ms. Neeru Ahuja, Deloitte Mr. Krishan Malhotra, KPMG*
15.45-16.00	Tea break
16.00-17.45	<b>Seventh Technical Session – Avoidance of disputes</b>
16.00-16.10	<i>Chairman:</i> Mr. Justice Aftab Alam, Supreme Court of India*
16.10-16.40	<b>Dispute Resolution Mechanism- International approaches</b> <i>Speaker:</i> Mr. Gurbachan Singh, KhattarWong, Singapore
16.40-17.10	<b>Arbitration under Tax Treaties</b> <i>Speaker:</i> Mr. Marcus Desax, Walder Wyss Ltd., Switzerland
17.10-17.45	<b>Improving the Justice Delivery Mechanism- need of the hour?</b> <i>Speaker:</i> Mr. Gopal Subramaniam, Senior Advocate
17.45-18.00	<b>Closing remarks and conference wrap up</b> Mr. Ajay Vohra, Chairman IFA India Branch

\* Confirmation awaited