

**INTERNATIONAL TAX CONFERENCE 2018**  
**CHANGING WORLD ORDER AND INTERNATIONAL TAXATION**  
**April 27-28, 2018, The Lalit, New Delhi**

**CONFERENCE PROGRAMME**

**Friday, April 27, 2018**

<b>Timings</b>	<b>Description</b>	<b>Speaker / Panelist</b>
08.00 – 09.00	<b>Registration</b>	
	<b>Conference opening</b>	
09.00 – 09.10	- Welcome Address	Ajay Vohra, Senior Advocate & Conference Chairman
09.10 – 09.20	- Message from IFA President	Murray Clayson
09.20 – 09.45	- Key Note Address	Suresh Prabhu, Minister of Commerce & Industry
09.45– 09.45	- Vote of Thanks	VP Gupta, Vice Chairman, IFA-India Branch
09.45 – 11.15	<b>Plenary 1</b> : BEPS Action – 1, Report on Digital Economy - PE issues and impact on Developing countries	Chairman : Vijay Mathur (PWC)*
		Dinesh Kanabar (Moderator)
		Akhilesh Ranjan, Pr. CCIT (International - tax)
		Pranav Sayta (EY)
		Ms. Shefali Goradia (Deloitte)
		Gary Gowrea (Mauritius)
		Amar Mehta (Canada)
11.15 – 11.30	<b>Refreshment Break</b>	
11.30 – 13.00	<b>Plenary 2</b> : BEPS Action 15 - Multi-lateral Instrument – Global Harmonization and Enforcement	Chairman: Akhilesh Ranjan, Pr. CCIT (International - tax)

		Gokul Chaudhary (Moderator)
		Sanjiv Chaudhary (KPMG)
		Rajat Bansal (IRS)
		Maikal Evers, OECD, France (through skype)
		Gurbachan Singh (Singapore)
13.00 – 14.00	<b>Luncheon address</b> – Push towards Digital Economy, followed by lunch	Ajay Prakash Sawhney, Secretary, IT & Electronics
14.00 – 15.30	<b>Plenary 3</b> : Introduction and Enhancement of GAARs in Asia and Effect and Consequences for Treaty Shopping / Treaty Abuse – case studies	<b>Chairman</b> : Arvind Datar, Sr. Advocate
		Ajay Vohra (Moderator)
		Padam Kincha, CA
		Ms. Heather Gething, (UK)
		Dr. Vikram Chand , University of Lausanne (through skype)
		Paul McNab, (PwC Australia)
		Sushil Lakhani, Chairman, IFA India Branch
		Rakesh Nangia, Nangia & Co.
15.30 – 15.45	<b>Refreshment Break</b>	
15.45 – 17.15	<b>Plenary 4</b> : Global tax developments - U.S. tax reform: Base Erosion Anti-Abuse Tax ( <b>BEAT</b> ); Foreign-derived Intangible Income and Global Intangible Low-Taxed Income; Australian Federal Court decision in the case of Tech Mahindra Ltd.; Exchange of Information, FACTA – real life situations	Chairman : Ms. Pragya Saxena, (CBDT)
		Abhishek Goenka (PwC) (Moderator)
		Lloyd Pinto (GT)
		Paul McNab (PwC Australia)
		Rajesh Simhan , Nishith Desai & Associates*
		S. Krishnan
		Mr. Vinay Kumar (IRS)*

## Conference Programme

**Saturday, April 28, 2018**

<b>Timings</b>	<b>Description</b>	<b>Speaker / Panelist</b>
09.45 – 11.15	<b>Plenary 5</b> : : BEPS Action 7 – Artificial Avoidance of PE – EPC contracts, Anti Fragmentation, preparatory auxiliary activities, commissionaire arrangements, e-Commerce Transaction	Chairman : Justice Vibhu Bakhru
		Vishal Anand (Moderator)
		Rohinton Sidhwa (Deloitte)
		Amar Mehta (Canada)
		Vikas Vasal (GT)
		TP Ostwal, TP Ostwal & Associates
		Sanjeev Sharma (IRS)
11.15 – 11.30	<b>Refreshment Break</b>	
11.30 – 13.00	<b>Plenary 6</b> : Transfer Pricing (Post BEPS Scenario - CbCR, Business restructuring, Business restructuring and Permanent Establishments, restructuring of intangibles, Profit Split – Applications in Practice )	Chairman : Amit Shukla (ITAT)
		Rahul Mitra (Moderator)
		Vijay Iyer (EY)
		Sanjiv Malhotra (Baker & McKenzie)
		Yuri Matsubara, Japan
		Rupak Saha (GE)
		Ms. Malathi Sridharan (IRS)
		Himanshu Sinha, Trilegal
13.00 – 14.00	<b>Luncheon address by an eminent personality</b>	Injeti Srinivas , Secretary Ministry of Corporate Affairs*
14.00 – 15.30	<b>Plenary 7</b> : Tax Litigation – Future scenario (Arbitration, Dispute	Chairman : Justice A.K. Sikri
		Mukesh Butani (Moderator)

	Resolution, Bilateral, APA, MAP	V. Lakshmikumar (L&S) Gurbachan Singh (Singapore) Kyung Geun Lee, Yulchon, Korea Kamlesh Varshney (IRS) Pallavi Bakhru, Vedanta
15.30 -15.45	<b>Refreshment Break</b>	
15.45 – 17.00	<b>Young India Network (YIN) Session</b> <b>Plenary 8</b> : Regulatory & tax implications reg. Block chain technology-Crypto currency	Chairman : Mukesh Butani , Advocate Kuntal Dave (Moderator) Sajan Poovayya, Sr. Advocate* Ms. Sonia Mathur, Sr. Advocate Ms. Shikha Mehra, Global Jindal Meyyappan Nagappan, Nishith Desai & Associates
17.00 -17.30	Valedictory Address	Harish Salve, Sr. Advocate*
	Close of Conference	

*\*To be confirmed*