



INTERNATIONAL TAX CONFERENCE

23rd August 2017 – Hotel Le-Meridien, New Delhi

CHIEF GUEST



Shri Arjun Ram Meghwal
Hon'ble Minister of State for Finance
Ministry of Finance, GoI

GUEST OF HONOUR



Shri Sushil Chandra
Chairman, CBDT
Ministry of Finance

KEYNOTE SPEAKER



Shri Akhilesh Ranjan
Principal Chief Commissioner of
Income Tax (International Taxation),
Ministry of Finance

THE ASSOCIATED CHAMBERS OF COMMERCE & INDUSTRY OF INDIA

ASSOCHAM has always aimed to enhance awareness of topical issues that confront today's business enterprises. Issues such as the effects of the current tax regimes on levels of foreign investment, the problems involved in integrating domestic tax reforms with existing international tax treaties and arrangements, international tax avoidance and efforts to prevent it; the existence and impact of tax havens and other low-tax jurisdictions are all of utmost importance. We, as one of the fastest growing economies in the world, need to take into account how various International taxation issues will affect us.

Therefore to present a wider perspective of contemporary international taxation typical issues and procedures and offer insight into issues that impinge the growth of international trade and commerce, ASSOCHAM is organizing its **14th International Tax Conference** as per the following schedule:

DATE, TIME & VENUE

DATE & DAY	TIME	VENUE
23 rd August 2017 Wednesday	9:30 a.m. – 05:30 p.m.	Hotel Le-Meridien Windsor Place, New Delhi-110001

The 14th International Tax Conference of ASSOCHAM envisages providing a platform for the tax payers, tax professionals and policy makers to understand each other's perspective in respect of legislation affecting international transactions.

TOPICS TO BE DISCUSSED

SESSION-1: PANEL DISCUSSION ON

- Multilateral Instrument (MLI)
- Permanent Establishment (PE)
- Treaty abuse
- Secondary Adjustment
- Financial Charges

SESSION-2: PRESENTATION

- Permanent Establishment (PE) & Profit attribution in the light of BEPS
- Development and Recent Judicial pronouncements in International Taxes/ Royalty/ FTS/ PE

SESSION-3: PRESENTATION

- Crystal gazing in Transfer Pricing - Global Prospective
- Recent Changes in Transfer Pricing regulations in India/Safe Harbour Rules

SESSION-4: PANEL DISCUSSION ON

- Place of Effective Management (PoEM)
- General Anti-Avoidance Rule (GAAR)
- Country-by-Country Reporting (CbCR)

SPEAKERS INVITED FROM GOVERNMENT

- **Shri Arjun Ram Meghwal**, Hon'ble Minister of State for Finance, Ministry of Finance
- **Shri Sushil Chandra**, Chairman, CBDT, Ministry of Finance
- **Shri Akhilesh Ranjan**, Principal Chief Commissioner of Income Tax (International Taxation), Ministry of Finance
- **Shri Rahul Navin**, Commissioner of Income Tax (Transfer Pricing)- I, Ministry of Finance
- **Shri Kamlesh C. Varshney**, Commissioner of Income Tax (International Taxation)-II, Ministry of Finance
- **Shri Pramod Kumar**, Member, ITAT

OTHER EMINENT SPEAKERS

- **Shri Vipul Jhaveri**, Chairman, National Council on International Taxes, ASSOCHAM
- **Shri Rahul Garg**, Chairman, National Council on Direct Taxes, ASSOCHAM
- **Shri Rakesh Nangia**, Co-Chairman, National Council on International Taxes, ASSOCHAM
- **Shri S P Singh**, Co-Chairman, National Council on Direct Taxes
- **Shri Praveen Surana**, Head- Direct Taxes, Bharti Airtel Ltd
- **Shri Mayur Shah**, Practicing Chartered Accountant
- **Shri Rupak Saha**, Partner, PwC
- **Shri Sanjay Kumar**, Senior Director, Deloitte
- **Shri Sunil D. Shah**, Partner, Deloitte
- **Shri Sandeep Puri**, Partner, PwC

In this regard, we would request you to kindly block your diaries for this meaningful conference

WHO SHOULD ATTEND

The conference is targeted at: CEOs, CFOs, Tax Experts, Senior & Middle Level Officers dealing in Taxation in the corporate world as well as practicing CA, CS, CMA and other related professionals, Trade & Industry, Government, Public Sector Units, Consultancy Organizations, Funding Agencies, Corporate Lawyers, Banks & Other Financial Institutions, FTOs.

AGENDA

10.00 a.m. – 11.30 a.m.

INAUGURAL SESSION

Introductory Remarks by

Shri D.S. Rawat, Secretary General, ASSOCHAM

Welcome Address by

Shri Sandeep Jajodia, President, ASSOCHAM

Theme Address by

Shri Vipul Jhaveri, Chairman, National Council on International Taxes, ASSOCHAM

Address by

Shri Rahul Garg, Chairman, National Council on Direct Taxes, ASSOCHAM

Keynote Address by

Shri Akhilesh Ranjan, Principal Chief Commissioner of Income Tax (International Taxation), Ministry of Finance

Address by Guest of Honour

Shri Sushil Chandra*, Chairman, CBDT, Ministry of Finance

Inaugural Address by Chief Guest

Shri Arjun Ram Meghwal*, Hon'ble Minister of State for Finance, Ministry of Finance

Vote of thanks by

Shri Rakesh Nangia, Co-Chairman, National Council on International Taxes, ASSOCHAM

11.10 a.m. – 11.30 a.m.

TEA / COFFEE BREAK

11.30 a.m. – 12.30 p.m.

SESSION 1 (PANEL DISCUSSION)

Panel discussion on Practical aspects of implementing

- *Multilateral Instrument (MLI)*
- *Permanent Establishment (PE)*
- *Treaty abuse*
- *Secondary Adjustment*
- *Financial Charges*
- *Other aspect of MLI*

Opening Remarks by Moderator

Shri Rahul Garg, Chairman, National Council on Direct Taxes, ASSOCHAM

Panelist:

Shri Akhilesh Ranjan, Principal Chief Commissioner of Income Tax (International Taxation), Ministry of Finance

Shri Rupak Saha, Partner, PwC

Shri Sunil D. Shah, Partner, Deloitte

Closing Remarks by Session Moderator

12:30 p.m. – 02:00 p.m.

SESSION 2 (TECHNICAL SESSION)

Opening Remarks by Session Chairman:

Shri Kamlesh C. Varshney, Commissioner of Income Tax (International Taxation) –II, Ministry of Finance

BEPS

- Permanent Establishment (PE)
- Attribution of Profits

By

- **Development and Practical aspects on Royalty & Fees for Technical Services (FTS)**
- **Recent Judicial Judgments in International Taxes**

By Shri Rakesh Nangia, Co-Chairman, National Council on International Taxes, ASSOCHAM

Q & A and Closing Remarks by Session Chairman

02.00 p.m. – 02.45 p.m.

LUNCH

02:45 p.m. – 04:15p.m.

SESSION 3 (Technical Session)

Opening Remarks by Session Chairman:

Shri Rahul Navin, Commissioner of Income Tax (Transfer Pricing-I), New Delhi

Crystal gazing at litigation in Transfer Pricing – Global Prospective

Shri Sandeep Puri, Partner, PwC

Recent Changes in Transfer Pricing regulations in India

Shri Sanjay Kumar, Senior Director, Deloitte

Q & A and Closing Remarks by Session Chairman

04:15 p.m. – 05.20 p.m.

Session 4 (Panel Discussion)

Panel Discussion on

- *Place of Effective Management (PoEM)*
- *General Anti-Avoidance Rule (GAAR)*
- *Country-by-Country Reporting (CbCR)*

Moderator: Shri S P Singh, Co-Chairman, National Council on Direct Taxes, ASSOCHAM

Panelist:

Shri Praveen Surana, Head Direct Taxes, Bharti Airtel Ltd

Shri Mayur Shah, Practicing Chartered Accountant

Shri Pramod Kumar, Member, ITAT

Closing Remarks by Session Moderator

05:20 p.m. – 05.30 p.m.

Concluding remarks & key takeaways

By Shri Rahul Garg, Chairman, National Council on Direct Taxes, ASSOCHAM

REGISTRATION FEE (Per Participant)

Rs. 4000/- for ASSOCHAM Members

Rs. 5000/- for Non Members

(10% discount for two and 20% discount for three or more persons from the same organization).
The fee is inclusive of taxes, refreshment, lunch & course material.

MARKETING OPPORTUNITIES

Advertisement for Backgrounder

The conference backgrounder under preparation for distribution to all our participants, governmental officials from CBDT & CBEC and to the Ministry of Finance, will have earmarked pages for advertisements providing excellent opportunity to promote your products / services at a nominal cost. The advertisement tariff and other details are:-

Back Cover*	Rs. 60,000	Ad Material: CD (Coral / JPG / PDF format with 300 dpi) <i>*will be booked on first come first served basis</i>
Front Inside Cover*	Rs. 50,000	
Back Inside Cover*	Rs. 40,000	
Full Page Colour	Rs. 25,000	
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Two complimentary delegates Passes will be given to the advertisers of cover pages and one complimentary Pass to other advertisers.

PARTNERSHIP OPPORTUNITIES

₹ Category of Partnership	Company Logo on Backdrop	Exhibition Space to showcase Companies' Brochure / Product	Company Logo to be prominently displayed on the Conference Kit	Sharing of Participants List	Company Information to be displayed on Main screens during the breaks (Tea/ Coffee & lunch) hours.	Networking Opportunities with Domestic and International Firms	Company Literature to be inserted in the Conference Kit	Opportunity to display Company Standee at venue	Full Page (colour) Advertisement in Conference Backgrounder (to be disseminated amongst the Sr. Officials (MoF), All Participants, Tax Experts etc.)	Complimentary delegate passes
PEARL PARTNER (Exclusive) (Rs. 3 Lakhs)	✓	✓		✓	✓	✓	✓	2	✓	5
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