



International Fiscal Association

Southern Regional Chapter - India Branch



BLOCK YOUR CALENDAR!!!



CONFERENCE DATES:
05 & 06 AUGUST 2016

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Presents

10th International Taxation Conference 2016

On

“International Taxation – Dawn of a New Era”

**At Hotel Hyatt Regency
Anna Salai, Chennai**

About the Conference:

Given the massive globalization epoch wave that is on and with geographies shrinking rapidly to accommodate more businesses, it is imperative to take a reality check as to whether International tax rules have kept pace with the frenetic evolution of multinational businesses. The Organization of Economic Co-operation Development (OECD) on its part has over the last few years taken gargantuan steps on aligning the global taxation rules with the dynamic evolution of multinational businesses. From the Indian perspective, with India becoming an active key Partner of the OECD and participating on equal footing with the OECD members on its significant tax projects, India appears to be pro-active in introducing tax principles which align with the global tax system.

With this background, the Southern Regional Chapter – IFA India Branch, Chennai is organizing a two-day international tax conference centered on the theme ***“International taxation – Dawn of a New Era”***. The two day conference will focus on the major developments happening on the international tax front and analyze on how introduction of global tax principles in Indian context will have its relevance to businesses pertinent to current day scenario.



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**EARLY BIRD
REGISTRATION**

INDIVIDUALS

BEFORE 15 July 2016

MEMBERS Rs. 5750

NON MEMBERS Rs. 6900

AFTER 15 JULY 2016

MEMBERS Rs. 6325

NON MEMBERS Rs. 7475

***Fee is all inclusive of
service tax**

International Fiscal Association – IB-SRC

2-L, Prince Arcade (Rear Block),
22-A, Cathedral Road, Chennai
600 086

This conference shall widely cover various aspects and updates on the BEPS project of the OECD, Transfer Pricing, GST- International Practices, etc., The agenda of the conference has been elucidated below:

1) Cross border taxation of partnership firms and Trusts – Taxation of Partnerships and Trusts has been a fascinating area in international taxation. The differences in tax treatment between jurisdictions pose challenge for partnerships. Interestingly, with the FDI into LLP gaining significance and Indian law treats the LLP on par with partnerships, it would be important to analyze the taxation of partnership firms. Further, trusts occupy a significant role in private equity, wealth management and various other strategic structuring aspects too. This fascinating area would also be analyzed in detail in this session.

2) Intellectual Property and International Structuring – IP drives value in many global corporations and housing of the IP in a favorable tax jurisdiction, as a practice, has come under scanner, particularly in the context of global corporations, with far flung operations. This session would cover the various favorable jurisdiction to house IP, the emerging issues in migration of IP and also disputes arising from these transactions.

3) Taxing digital economy: Challenges in the equalization levy and the proposed GST – This sunrise sector occupies a central position in tax debates and discussions. Over a decade and more, tax professionals and Governments have been mulling over the taxation of e-commerce transactions. Given the predominance of this industry, with large amounts of investments flowing into this sector, it would be important to discuss the issues arising in this sector, the manner in which the Government seeks to deal with this sector and also to deal with the challenges faced by this sector in local taxation such as VAT, GST and entry tax. The conference would be a fine blend of presentations, case studies by eminent speakers on the subject and shall allow for a healthy debate among all the participants.

4) Managing transfer pricing challenges in today's dynamic business scenario - A case study on manufacturing sector - Developing a sustainable transfer pricing strategy in a dynamic manufacturing scenario involves several aspects around, Research & Development, manner in which royalties are structured, cross charge of management support services, issues around loans and financial guarantees, emerging aspects around business restructuring and related exit charges. This session would provide a case study on how various aspects interplay in an effective transfer pricing strategy.

5) GST – What the Law beholds? – GST, redefines the taxing system for supply of goods and services. A legislation, which is game changing and promises to deliver seamless credit for taxes. Apart from being a tool for taxation, it is also described as a tool to pump up efficiencies in business and deliver revenues to poorer consuming States. What does this behold for the industry and professionals? An insight into this would be important. This session would deliver an insightful analysis into this new legislation.



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Participants are requested to have the enrolment forms submitted to our Administrative Office mentioned below at:

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6) General Anti Avoidance Rules – the Sweep, its impact and preparedness–GAAR is a dreaded law. It could be a nightmare for taxpayers. Such is the sweep and its impact.

- Can we be prepared at all?
- How much trouble could this legislation create for corporates?
- What are the broader aspects to be borne in mind, in being prepared for this new regime?

This session would provide an analysis of the provision, its potential reach and also some broad do's and don'ts for the regime.

7) Moot Court on Transfer Pricing Disputes – A novel session on arguments for both the taxpayer side and revenue's side would be presented on the following topics where most litigation has been witnessed in the recent times. Let's debate this out.

- Is real income relevant for transfer pricing?
- Can AMP never be international transaction?
- Outbound Guarantee – Is retrospective amendment not relevant?

8) Panel Discussion on APA and MAP – To counter a regime of uncertainty in tax, particularly in transfer pricing, we have witnessed, proactive measures from the Government introducing APAs. The initial experience of tentativeness around the regime has improved into positive optimism. This session would deal with the following:

- Need for APA / strategies
- Roll back or not?
- Flexibility of APA
- MAP Vs Litigation

9) Global Economy – crystal ball gazing! – When the Global economy is volatile, with Brexit becoming a massive blow to EU, with the markets being in a tizzy, what does the global economy holds out for us? This session would be an interesting dialogue on the global economy, trends and expectations and where India stands. Tax isn't everything for industry and professionals, is it?!

With such newfangled topics and the eminent resource persons, we sincerely hope that the two day conference will enrich and enkindle thoughts as we move towards a new era of international taxation. Look forward for your presence at the conference and have a knowledge invigorating experience...

Mr Sriram Seshadri
Chairman – IFA –IB-SRC

Mr K Sudarshan
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