



International Fiscal Association
India Branch

A METAMORPHIC PHASE
INTERNATIONAL TAX
LANDSCAPE 2024

February 16-17, 2024 | 'Hotel ITC Kohenuur', Hyderabad

The conference is co-hosted by the Southern,
Western and Northern Region Council of IFA – India.

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ABOUT THE CONFERENCE



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New business models with reliance on intangible assets have taken the CenterStage which poses serious challenges for tax administrations in capturing nexus for taxation by a particular jurisdiction. The centrality of data and scale without mass is facilitated by the digitalisation of businesses in a borderless manner. New technologies have thrown challenges to the tax administrations in detecting and checking the base erosion and profit shifting. OECD G20 BEPS Inclusive framework have been seized of this agenda and Two-Pillar solution has been provided to address the concerns. An Outcome Statement on the Two-Pillar solution to address the tax challenges arising from the digitalisation of the Economy was released by OECD on 11th July 2023. Global minimum tax under Pillar two is surging forward in terms of implementation by various jurisdictions. Pillar one which deals with digital taxation is still at the advanced consultative process.

MLI has become a reality in several jurisdictions including India. United Nations is in the process of asserting itself as a tax policy body in the years to come.

Interpretations of tax treaties on the basis of good faith principle assumes special attention in the advent of recent jurisprudence. Dispute resolution is critical and is a minimum standard as agreed upon by the inclusive framework members. Nexus rules with respect to taxes and accounting under the Two-Pillar solution is of critical importance. Cross border dynamics in the era digitalization bring in metamorphic changes that draws the attention of tax gatherers both from direct and indirect taxes perspective.

Last but not the least in the era of Multilateralism that is strongly advocated by OECD G20 BEPS initiative, we need to understand how sovereign rights of the nations can still be pursued and maintained under the Bilateralism. At this metamorphic phase in the international taxation landscape IFA India Branch thought it appropriate to line up a conference of this profile to deliberate the most current topics to be dealt with by eminent and renowned speakers from across India and other parts of the world. This conference would immensely benefit delegates from Corporates, tax practitioners, academicians and the revenue officials.



CONFERENCE VENUE
HOTEL ITC KOHENUR, HITEC CITY,
HYDERABAD



IFA INDIA

INTERNATIONAL TAX CONFERENCE 2024

HOTEL ITC KOHENUR, HITEC CITY, HYDERABAD

16 & 17 FEBRUARY 2024

CONFERENCE AGENDA

Day 1: Friday, 16 February 2024

Opening Ceremony (09:30 AM - 10:30 AM)

- Chief Guest** : Hon'ble Mr. Justice Chandrakant V. Bhadang, President, ITAT
: Mr. Porus Kaka, Senior Advocate, Past President - IFA Global
: Mr. PVSS Prasad, Chairman, IFA India Branch
: Mr. Avinash Gupta, Hon. Secretary, IFA India Branch

Session 1

Current issues in International Taxation (10.30 AM - 11.45 AM)

- Chair** : Mr. P.V. Srinivasan, Partner, PV Advisors, Bengaluru
Panelist : Mr. Sriram Seshadri, Price Waterhouse & Co. LLP
: Mr. Himanshu Parekh, Partner and Head of Tax (West), KPMG in India
: Mr. Vineet Rachh, P&G, Vice President - Asia Pacific, Middle East and Africa Tax

11:45 AM - 12 Noon - Tea Break

Session 2

MLI- PPT & Interpretation Issues (12:00 PM - 1:15 PM)

- Chair** : Mr. Padamchand Khincha, Partner, H C Khincha & Co, Bangalore.
Panelist : Mr. K.K Chythanya, Senior Advocate
: Mr. Neeraj Jain, Senior Partner at Vaish Associates, Advocates
: Mr. Ananth Padmanabhan, Partner Deloitte Bangalore

1:15 PM - 2:15 PM - Lunch Break

Session 3

Good Faith Principle - Tax treaties (2:15 PM - 3:40 PM)

- Chair** : Dr. Robert Danon, Chair Permanent Scientific Committee IFA (PSC).
Panelist : Mr. Ajay Vohra, Senior Advocate (India)
: Mr. Chetan Rao (NYC), CIT, Foreign Tax & Tax Research,
Department of Revenue, Govt. of India.
: Mr. PV Srinivasan, Partner, PV Advisors, Bengaluru.

3:40 PM - 4:00 PM: Tea Break

Special Address on UN as a Tax Policy body in the Global scenario (4:00 PM - 4:30 PM)

- Speaker** : Mr. Michael Lennard, Chief - International Tax Cooperation, United Nations
Moderator : Mr. Mayur Nayak, Chairman, IFA WRC

Session 4 International Tax Dispute Avoidance & Resolution (4:30 PM - 5:45 PM)

- Chair** : Mr. Rajat Bansal IRS, Pr. CCIT International Taxation
Panelist : Mr. Mukesh Butani, Managing Partner, BMR Legal
: Mr. Sriram Govind, OECD
: Mr. Sudarshan Rangan, Advocate

Day 2: Saturday, 17 February 2024

Special Address on The Evolution of Global Taxation: Understanding the Global Minimum Tax (9:00 AM - 9:30 AM)

Speaker : Mr. Juan Carlos Perez Pena, International Tax Consultant & Ex-Pillar 2 Advisor, OECD

Moderator : Mr. Nilesh Kapadia, Vice Chairman, IFA India

Session 5 Nexus Rules - Taxes & Accounting (Two pillar solution)

(9:30 AM - 10:45 AM)

Chair : Prof. Miranda Stewart, Melbourne Law School, Australia

Panelist : Ms. Shefali Goradia, Deloitte, India

Mr. Pranav Sayta, EY

Mr. Padamchand Khincha, Partner, H C Khincha & Co, Bangalore

10:45 AM - 11:05 AM - Tea Break

Session 6 Current issues in Transfer Pricing (11:05 AM - 12:30 PM)

Chair : Mr. TP Ostwal, CA

Panelist : Mr. Vijay Iyer, Transfer Pricing Leader, Ernst & Young India

Mr. Eric Mehta, Transfer Pricing Leader, Price Waterhouse & Co LLP

Ms. Kalale Mambwe, TIWB, OECD

Special address on Multilateralism Vs Bilateralism - Tax treaties"

(12:30 PM - 1:00 PM)

Speaker : Mr. Guglielmo Maisto, President IFA - Global

Moderator: : Mr. PVSS Prasad, Chairman, IFA India Branch

1:00 PM - 2:00 PM - Lunch Break

Session 7

Metamorphic changes - Cross border dynamics- GST & Direct taxes

(2:00 PM - 3:15 PM)

Chair : Mr. V. Sridharan, Senior Advocate, Bombay HC and Co-founder LKS

Panelist : Mr. Raghavan Ramabadrn, Executive Partner, LKS

Mr. S. Sriram, Partner, LKS

Ms. Shikha Gupta, Senior Tax Advisor

Session 8 Global Minimum Tax - Pillar Two (3:15 PM - 4:45 PM)

Chair : Mr. Sanjay Tolia, Partner, Price Waterhouse and Co LLP

Panelist : Dr. Vikram Chand, Professor of International Tax Policy, University of Lausanne

Mr. Shyamsundar Nori, Head of Tax - India and Emerging Markets,

Mylan Laboratories

Ms. Geeta Jani, EY

Closing Remarks

4.45 PM - Tea & Snacks

Opening Address

9.30 AM - 10.30 AM



Chief Guest: Hon'ble
Mr. Justice Chandrakant
V. Bhadang, President, ITAT



Mr. Porus Kaka



Mr. PVSS Prasad



Mr. Avinash Gupta

Session 1

10.30 AM - 11.45 AM

Current issues in International Taxation



Mr. P.V. Srinivasan



Mr. Sriram Sehadi



Mr. Himanshu Parekh



Mr. Vineet Rachh

Session 2

12.00 Noon - 01.15 PM

MLI- PPT & Interpretation Issues



Mr. Padmachand Khincha



Mr. K.K Chythanya



Mr. Neeraj Jain



Mr. Ananth Padmanabhan

Session 3

02.15 PM - 03.40 PM

Good faith Principle - Tax treaties



Dr. Robert Danon



Mr. Ajay Vohra



Mr. Chetan Rao



Mr. PV Srinivasan

Special Address

04.00 PM - 04.30 PM

Mr. Michael Lennard
Chief - International
Tax Cooperation,
United Nations



Mr. Michael Lennard



Mr. Mayur Nayak

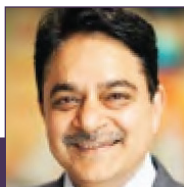
Session 4

04.30 PM - 05.45 PM

International Tax Dispute Avoidance & Resolution



Mr. Rajat Bansal IRS



Mr. Mukesh Butani



Mr. Sriram Govind



Mr. Sudarshan Rangan

Special Address

09.00 AM - 09.30 AM

Juan Carlos Perez Pena

International Tax Consultant & Ex-Pillar 2 Advisor, OECD



Mr. Juan Carlos Perez Pena



Mr. Nilesh Kapadia

Session 5 09.30 AM - 10.45 AM **Nexus Rules - Taxes & Accounting (Two pillar solution)**



Dr. Miranda Stewart



Ms. Shefali Goradia



Mr. Pranav Sayta



Mr. Padamchand Khincha

Session 6 11.05 AM - 12.30 PM **Current issues in Transfer Pricing**



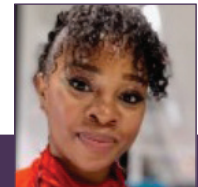
Mr. TP Ostwal



Mr. Vijay Iyer



Mr. Eric Mehta



Ms. Kalale Mambwe

Special Address

12.30 PM - 01.00 PM

Mr. Guglielmo Maisto
President IFA - Global



Mr. Guglielmo Maisto

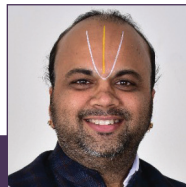


Mr. PVSS Prasad

Session 7 02.00 PM - 03.15 PM **Metamorphic changes - Cross border dynamics- GST & Direct taxes**



Mr. V. Sridharan



Mr. Raghavan Ramabadran



Mr. S. Sriram



Ms. Shikha Gupta

Session 8 03.15 PM - 04.45 PM **Global Minimum Tax - Pillar Two**



Mr. Sanjay Tolia



Prof. Dr. Vikram Chand



Mr. Shyamsundar Nori



Ms. Geeta Jani

Registration Fee (Inclusive GST)

Category	Indian Participant (INR)	Foreign Participant (USD)
IFA Member/ Govt. Officials	9,000	120
Non-IFA Member	10,500	140
YIN IFA Member	8,000	110

Enrolling by making payment through cheque/NEFT

Beneficiary Name	International Fiscal Association - India Branch
IFA Address	C-56/9A, Sector-62, Noida, U.P. - 201 301 (this is where to courier)
Beneficiary Bank	IndusInd Bank Limited
Bank Address	N-10-11, Sector-18, Noida-201301
Type of Account	SAVING ACCOUNT-TASC Regular
Account No	100003603083
IFSC	INDB00000036
MICR No.	110234006

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Kindly let us know when you remit the registration fee so that we can keep a track of the same. Please email the payment confirmation receipt/acknowledgement on ifaindiabbranch@gmail.com

May you require any information or assistance, please feel free to reach out to

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Mr. Prabhakar

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