



RESIDENTIAL INTERNATIONAL TAX CONFERENCE

Presented by

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YOUNGIFANETWORK

2019



International Fiscal Association

Date: Nov 9th - 11th

at Hotel Taj, Agra UP

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KEY SPEAKERS

- Mr. Mukesh Butani, Partner BMR Legal Advocates, Chairman IFA
- Mr. Ajay Vohra, Senior Advocate
- Mr. Padam Chand Khincha, Partner in H C Khincha & Co
- Mr. Kamlesh Varshney, Joint Secretary Finance
- Dr. Amar Mehta, President Indi-Genius Consulting.
- Mr. Ashwani Taneja, Ex- ITAT Member
- Mr. Girish Vanvari, Transaction Square
- Mr. Vijay Iyer, EY

Group Discussion Case Studies

- Avoidance of PE Status- Article 12 to 15 of MLI.

Panel Discussions

- MLI interpretation in the Indian context & impact on key treaties.
- Presentation on Dispute Resolution Mechanism under MLI.

Technical sessions

- Discussion on Avoidance of PE Status - Article 12 to 15 of MLI.
- How to argue effectively before the ITAT.
- Principles regarding interpretation of treaties.

Special Address

- Undisclosed International Transactions - An interplay between The Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act, 2015, PMLA, Companies Act and Income Tax Act.
- Taxation of Software in India in post MLI regime.

- Ghazal Night by Aman Group, Games, Gala Dinner and Much More...

About the Speakers



Mr. Mukesh Butani is founder of BMR Legal. With over three decades of specialization in domestic corporate international tax and transfer pricing, he has significant experience in advising Fortune 500 multinationals and large Indian business houses on a wide range of matters relating to FDI policy, business re-organizations and cross-border tax structuring.



Mr. Ajay Vohra, Senior Advocate designated from the Delhi High Court in September 2014 has been practicing since last 35 years in the area of domestic and international tax. He has argued several cases involving complex issues having wide ramifications, which has contributed immensely to the tax jurisprudence in the country and is one of the leading advocates arguing on tax matters before the Tax Tribunals, High Courts and the Supreme Court. He is also a qualified chartered accountant.



Mr. H Padamchand Khincha is a partner in H C Khincha & Co, Bangalore. With over 30 years of experience in corporate and international tax, he has spearheaded the income-tax consultancy and litigation practice. Padamchand Khincha is a prolific writer on various topics in income-tax. He has also been actively engaged in several initiatives undertaken by the Institute of Chartered Accountants of India (ICAI) including being appointed the group leader for preparing the approach paper on the Guidance Note on Transfer Pricing, making a critical analysis of the Direct Tax Code as a member of the team constituted by the ICAI on the request of the CBDT, etc.



Mr. Kamlesh Varshney, Joint Secretary – Finance is a 1990 batch Indian Revenue Service Officer. He is also an MBA from Indian Institute of Management Lucknow and has also obtained his degree in Law. As an IRS officer he has worked as Director in CBDT in the area of Tax Policy and also Foreign Tax. He was also involved in rolling out APA program in India and was its first Commissioner.



Dr. Amar Mehta is president at Indi-Genius Consulting and holds Ph.D. in international taxation from the highly coveted Faculty of Law, The University of Amsterdam, The Netherlands, and he is also a Chartered Accountant (ICAI-India). He is a former international tax researcher at International Bureau of Fiscal Documentation (IBFD) in Amsterdam.



Mr. Ashwani Taneja a Member of the ICAI, ICSI and ICAI-CMA also holds B.Com (Hons.), LL.B and LL.M degrees and diploma in DISA from ICAI. He has to his credit more than 25 years of experience. Mr. Taneja, a former Member of the Income Tax Appellate Tribunal (ITAT), in the year 2006 switched over to advocacy and practised as Lawyer, with a strong focus on appellate side of Income Tax Law



Mr. Girish Vanvari is the Founder at Transaction Square, a Tax, Regulatory and Business Advisory Firm. With over 25 years of consulting experience, Girish, a fervent champion of ethical tax practice and professional integrity in the Global Tax Eco-system, before founding Transaction Square, had a 13 year stint with KPMG and had been the National Leader for Tax at KPMG India.



Mr. Vijay Iyer is the National Leader for Transfer Pricing in Ernst & Young, India. He has been rated as one of the world's leading Transfer Pricing Advisors for India by the Legal Media Group and by International Tax Review.

About the conference

On behalf of Northern Region Chapter of the India Branch of International Fiscal Association, members of YIN-NRC takes immense pleasure in inviting all the delegates to the Residential International Tax Conference, 2019 to the historic city of Agra at the Taj Hotel & Convention Centre, Agra.

Taj Mahal, an immense mausoleum of white marble, built in Agra between 1631 and 1648 by order of the Mughal emperor Shah Jahan in memory of his favourite wife, the Taj Mahal is the jewel of Muslim art in India and one of the universally admired masterpieces of the world's heritage.

Taj Hotel & Convention Centre, lies a short walk away from the Eastern Gate of this fabled monument. This modern 5 star hotel reimagines all that Agra can be. A refreshing rooftop infinity pool with magical views of the Taj Mahal, an invigorating spa and a buzzing fitness centre are at hand to rejuvenate every guest.

The conference marks the third IFA India Residential International tax conference. The agenda of the conference covers discussion on some of the emerging issues on international tax laws. We are elated to have participation of tax experts from different countries.

All the arrangements have been made to make your stay comfortable at Taj Hotel & Convention Centre, Agra, Uttar Pradesh and experience enlightening. We have organized a Gazal Night by Aman Group, Games and Gala Dinner to recreate, refresh and make your stay a pleasant and memorable experience. We would like your active participation in the conference and hope that this conference will be a highly educative, refreshing and memorable event for all of us.

The YIN – IFA Team endeavors to make its Annual Residential Conference a memorable event for the participants by ensuring maximum interaction and active participation by the participants in the Moot Court Session and the Group Discussions; and we take this opportunity to invite registered participants for leading the groups during the sessions and participating as arguing counsels/speakers for the moot court.

We would be providing the participants (in advance) conference material which will serve as MLI reckoner. All participants would also get complimentary Taxmann access for the next 6 months

The program layout is as under –

Group Discussion - Case Studies

- Avoidance of PE Status. Article 12 to 15 of MLI

Panel Discussions

- MLI interpretation in the Indian context & impact on key treaties
- Presentation on Dispute Resolution Mechanism under MLI

Technical sessions

- Discussion on Avoidance of PE Status - Article 12 to 15 of MLI
- How to argue effectively before the ITAT
- Principles regarding interpretation of treaties

Moot Court

- Arguments on international transactions and artificial avoidance of PE

Special Address

- Undisclosed International Transactions - An interplay between The Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act, 2015, PMLA, Companies Act and Income Tax Act.
- Taxation of Software in India in post MLI regime
- Structuring of Inbound and Outbound investments post MLI