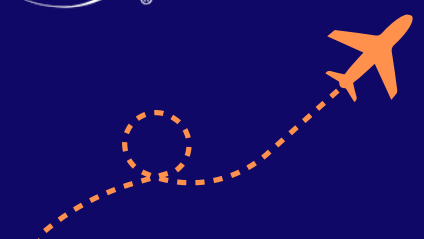


GLOBAL IFA TRAVELLING LECTURESHIP PROGRAMME 2024



TOPIC: INTERNATIONAL TAX DISPUTE RESOLUTION
REGISTRATION: FREE OF CHARGE



Lecturer: Porus Kaka (Honorary President IFA, Senior Advocate (India) & Barrister (England & Wales) and Trustee (IBFD))

Panelists:

DR. Mekar Satria Utama, SE., MP, Acc. (Director of International Taxation – the Director General of Taxes)

Patrick Connolly (TEI Asia President)

Permana Adi Saputra (IFA Indonesia Secretary General)

**JAKARTA,
INDONESIA**

13 MAY, MONDAY

16:00-18:00

On Five
Grand Hyatt Hotel 5th Floor
Jl. MH Thamrin Kav. 28-30
Jakarta 10350

Language: English

IN COOPERATION WITH:
INTERNATIONAL CHAMBER OF COMMERCE (ICC)
TAX EXECUTIVES INSTITUTE (TEI)

**To register, please send an e-mail to IFA Indonesia:
ifa.indonesia.chapter@gmail.com**



16:00-16:15. Arrival attendees and Coffee

16:15-16:25. Opening words: **Ichwan Sukardi** (IFA Indonesia President)

16:25-16:30. Opening of scientific agenda: **Porus Kaka** (Honorary President IFA, Senior Advocate (India) & Barrister (England & Wales) and Trustee (IBFD). Introduction of topic, objectives, travelling lecturer and panel composition

16:30-16:55. Lecture on a main topic: **Porus Kaka**

- Objectives of BEPS Action 14 and global standards on dispute resolution, including Peer Review Mechanism
- Scope of the MAP (including as the case may be tax treaty arbitration): what is inside and outside the MAP
- Access/denial of MAP requests
- Judicial review in relation to the denial of access to MAP and information access
- Possible improvements to the OECD Commentary on Art. 25 to better align the practice to the objectives of BEPS Action 14

16.55-17.30. Panel discussion

DR. Mekar Satria Utama, SE., MP, Acc., Patrick Connolly, Permana Adi Saputra

- Indonesia tax treaty dispute resolution policy and practice and standards laid down by BEPS Action 14;
- Perspective and experience with tax treaty arbitration;
- Current experiences: (i) increase or decrease of MAP cases/country(ies) with the most important number of MAP cases, (ii) experiences with developing countries;
- Challenges raised by capacity building;
- Indonesia's perspective on the handling of P2 disputes.
- Perspective of businesses on the above inputs.

17.30-17.40. Q&A with the floor

17.40-17.45. Concluding remarks: **Porus Kaka, Ichwan Sukardi**

17.45-19.00. Cocktail Reception

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