



IFA India Branch is thrilled to bring you the India - UK Joint International Tax Conference

"Changing World Order And Emerging International Taxation Landscape."

🛗 September, 17<sup>th</sup> & 18<sup>th</sup>, 2024

New Delhi At 'Crystal Ball Room', of Hotel 'The Lalit'.

+91-9599937603

### **About The Conference**

# IFA India & UK

IFA India has been organising its Annual International Tax Conference in New Delhi on the most current topics that are dealt with renowned National and International speakers. This Flagship event has been widely acclaimed by the industry, tax practitioners, academicians and revenue officials who look forward for the same year after year.

The much-awaited event is lined up this year jointly with IFA UK on 17 th and 18 th September 2024 in New Delhi in hybrid mode with the theme "Changing World Order and Emerging International Taxation Landscape". It is indeed a metamorphic phase for the international tax world more so in the advent of digitalization of businesses. OECD G20 Inclusive Framework is grossly engaged in the Two Pillar solution as part of the Global tax deal agreed upon in October 2021.

Advancement and dynamics of Technology throw challenges to tax administrations in respect of designing the tax rules for the evolving digitalised business models. Nexus rules for taxation need to be updated on the basis of changing business models. In this backdrop, a conference of this profile is lined up to deal with most current topics such as Nexus for Taxes, Substance of Legal Entities, Global Minimum tax, Cross border restructuring and mergers, present status of Two Pillar solution, evolving perspectives of the UN and the OECD.

This conference will feature Hon'ble Judges from the Courts, Members of Income Tax Appellate Tribunal, Senior Revenue officials, renowned national and International tax experts, distinguished academicians as speakers.

## **About The Conference**



This conference would be a festival of learning for exchange of views and knowledge sharing with renowned speakers dealing with most current topics in the international tax landscape. This event would immensely benefit tax executives, tax practitioners, researchers and young professionals.

### **About The Venue**

The LaLiT New Delhi is located in central Delhi in close proximity to key commercial and business locations.



### ♀ Hotel The Lalit, New Delhi.

**Location On Map** 

#### **About IFA**

# (IA) IFA India & UK

International Fiscal Association (IFA) is a leading non-Governmental international organization dealing with tax matters since 1938. Its members comprise of corporate, tax professionals, Government officials and academicians and it is a unique forum to discuss international tax issues.

IFA has grown to a truly global association with 13,000 members from 118 countries. IFA has 70 Branches worldwide. For members in countries where an IFA Branch has not been yet established, IFA facilitates direct membership. IFA is engaged in the study of international laws and policy through scientific research, holding of annual Congress, publication of its cahiers and other materials and co-operation with other like-minded organizations. IFA Congresses are attended by judges of the Supreme Court of different countries, senior Government officials, jurists, academicians, tax professionals, etc. The recommendations of IFA Congress are respected by Governments the world over.

The India branch of IFA was established in 1983 and has over 500 members. The IFA India branch includes as its members the Central Board of Direct Taxes, the National Institute of Public Finance and Policy, the Authority for Advance Rulings and the Reserve Bank of India. Representatives from public and private sector undertakings and eminent tax professionals and executives are also part of IFA India branch.



#### Date: Tuesday, 17<sup>th</sup> September 2024

09:30am to 10:30am Inauguration Ceremony

> 09:30am to 09:35am Lighting of the Lamp

09:35am to 09:40am Welcome Address: Mr. Ajay Vohra, Senior Advocate

09:40am to 09:45am **Theme Address: Prasad PVSS,** Chairman, IFA India Branch

09:45am to 10:05 am Address by Guest of Honour: Mr. Ravi Agarwal, Chairman of the CBDT

10:05am to 10:25 am Address by Chief Guest: Justice Chandrakant V. Bhadang\* (Retd.), President ITAT

10:25am to 10:30am Vote of Thanks

10:30am to 11:45am
Panel 1: Issues facing Startup world
Chairperson: Mr. Saurabh Srivastava\*
Panelists: Mr. V. Lakshmikumaran, Lakshmikumaran and Sridharan Mr. Albinder Dhindsa, Founder, Blinkit Ms. Parul Jain, Head – International Tax, Nishith Desai Associates
11:45am to 12:00pm
Coffee / Tea Break

12:00pm to 01:15pm **Panel 2:** Cross border Restructuring & Mergers Moderator: Mr. Ajay Vohra, Senior Advocate Panelists: Ms. Shuchi Gupta, EY Mr. Hardeep Sachdeva, AZB Partners Mr. Sunil Kumar Dhareshwar, InfoSys



#### Date: Tuesday, 17th September 2024

01:15pm to 01:35pm Luncheon Address Speaker: Mr. Guglielmo Maisto, President IFA – Global

01:35pm to 02:25pm Lunch Break

02:25pm to 03:40pm Panel 3: Nexus for Taxes – Past, Present & Future Chairperson: Prof. Philip Baker, UK Panelists: Mr. H. Padamchand Khincha, CA Dr. Rita Da Cunha, Field Court Tax Chambers, UK Dr. Dhruv Janssen–Sanghavi, Janssen–Sanghavi & Associates, India & The Netherlands

03:40pm - 04:10pm **Special Address 1:** Canadian GAAR Jurisprudence & Interplay with Principal Purpose Test (PPT) Moderator: CA Avinash Gupta **Speaker: Ms. Pooja Mihailovich,** Partner Osler, Canada.

04:10pm - 04:25pm Coffee / Tea Break

04:25pm - 05:40pm Panel 4: International Tax Jurisprudence – India/UK and other countries' case law Chairperson: Justice Yashwant Varma\*, Judge, Delhi High Court Moderator: Mr. Dinesh Kanabar, Dhruva Advisors Panelists: Prof. Jonathan Schwarz, Temple Tax Chambers, King's College, University of London. Mr. Saktijit Dey\*, VP ITAT Mr. N. Venkatraman, ASG Mr. Pramod Kumar, VP ITAT (Retd.)



#### Date: Wednesday, 18th September 2024

09:30am to 10:45am Panel 05: Recent Developments in International Taxation Chairperson: Dr. Robert Danon\*, Chairperson IFA PSC Panelists: Mr. Sriram Seshadri, PWC Chennai Ms. Bijal Ajinkya, Khaitan & Co.

10:45am to 12:00pm
Panel O6: Pillar One / Pillar Two – Updates & Art. 12B UN MC
Moderator: Ms. Shefali Garodia, Deloitte Mumbai
Panelists: Mr. John Peterson, OECD

Mr. Chetan Rao, IRS Commissioner of Income Tax. Delhi
Mr. Himanshu Parekh, Partner and Head of Tax (West), KPMG in India

12:00pm to 12:15pm Coffee / Tea Break

12:15pm to 12:45pm **Special Address 2:** New Developments under India—Mauritius Tax Treaty Moderator: Mr. Hitesh Gajaria, KPMG India **Speaker: Roomesh Ramchurn,** Vice Chairman IFA Mauritius

12:45pm to 01:45pm **Fireside Chat:** Substance of Legal Entities **Speakers:** Mr. Porus Kaka, Senior Advocate Ms. Ceinwen Rees, Partner at Kirkland and Ellis in London

01:45pm to 02:30pm Lunch Break



#### Date: Wednesday, 18th September 2024

02:30pm to 03:45pm Panel 7: International Tax dispute prevention & resolution Chairperson: Justice (Retd.) A. K. Sikri\*, Supreme Court of India Moderator: Mr. Mukesh Butani, Senior Advocate Panelists: Ms. Sarah Blakelock, UK Mr. Vineet Rachh, P&G – Singapore Mr. Bhaskar Goswami\* JS (FT & TR) – II

Mr. Neeraj Kumar Jain, Advocate Delhi

03:45pm to 04:15pm **Special Address 3:** UN vs. OECD : Evolving Perspectives **Speaker: Prof. Philip Baker KC,** Field court chambers, London UK

04:15pm to 04:30pm Coffee / Tea Break

04:30pm to 05:45pm Panel 8: Multilateral Instrument (MLI) – PPT Vs GAAR Chairperson: Justice Vibhu Bakhru\*, Judge, Delhi High Court Moderator: Prasad PVSS, Chairman, IFA India Branch Panelists: Mr. Mike Lane, Partner, Slaughter & May, London Mr. N. Venkatraman, ASG Mr. Ajay Vohra, Senior Advocate

05:45pm to 05:55pm Concluding Remarks

## **Registration Details**



#### Virtual Streaming Rates for UK & Foreign Nationals

Category	GBP (Pound)	Euro	Dollar (USD)
IFA Members	£55.00	€65.00	\$70.00
Non IFA Members	£65.00	€75.00	\$80.00
YIN / Goverment Official	£55.00	€65.00	\$70.00

\*Virtual streaming links will be provided on the registred email address.

#### **Registration Link:** https://ifaindia.in/International\_tax\_conference.aspx

Click Here

#### IFA India Branch - NRC | Bank Details

(You can send us the payment through cheque or demand draft/pay order along with your details)

Beneficiary Name	:	International Fiscal Association - India Branch
IFA Address	:	C-56/9A, Sector-62, Noida, Uttar Pradresh - 201301
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	:	INDB0000036
MICR No	:	110234006
SWIFT Code	:	INDBINBBNDH

Note: Kindly let us know by Mail or WhatsApp, when you send us the payment.

### **Contact IFA**

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## Sponsorships

The annual conference encourages participation and support of corporates and professional services firms. Opportunities for such support include:

Titanium: INR 15 lacs;	Platinum: INR 12 lacs;	Gold: INR 8 lacs;	Silver: INR 5 lacs;	

In addition, we would encourage your support for hosting lunch, conference bags & stationery etc. We shall be sending details of benefits to supporting Organizations in due course.