Organized by
FOUNDATION FOR INTERNATIONAL TAXATION

Trustees: Professor Roy Rohatgi, Kiran Umrookar, T P Ostwal, Sachin Menon, Dr. (C.A.) Sunil Moti Lala, Mukesh Butani

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A copy of this brochure and the registration form can be downloaded from our website www.fitindia.org and registration can be done online.
Day One: December 5, 2019 (Thursday)

Official Opening
0800-2000 Registration
0845-0915 Welcome by Joint Conference Directors
Roy Rohatgi, Managing Trustee, Foundation for International Taxation, India
Belema Obuoforibo, Director of Knowledge Centre, IBFD, The Netherlands
0915-0930 Special Address - Former President, International Fiscal Association - Worldwide (Video Recording)
0930-1000 Tea Break

Plenary Session: Proposed Allocation of Global Taxing Rights Over Digital Income Under BEPS Action One
Chairman: Porus Kaka, former President, International Fiscal Association Worldwide - 2012-17
1000-1130 "Klaus Vogel" Speaker: Pascal Saint-Amans, Director, Centre for Tax Policy and Administration, OECD, Paris
Political Economy Context: An Overview of the New Approach
Overview of key elements of Pillar II by Pascal Saint-Amans, OECD followed by a Panel Discussion led by Melissa Dejong, OECD, Panelists: Richard Collier, OECD; Giugliamo Maisto, Italy; Akhilesh Ranjan, India; Mike Williams, UK with concluding remarks from the Session Chair
1300-1400 Lunch Break

Session: Policy Economy Context & New Approach
Chairman: Belema Obuoforibo, Director of Knowledge Centre, IBFD, The Netherlands
Overview of key elements of Pillar II by Pascal Saint-Amans, OECD followed by a Panel Discussion led by Melissa Dejong, OECD, Panelists: Rasmil Ranjan Das, India; Annet Wanyana Oguttu, South Africa; David Stewart, USA
Chairman: Sol Picciotto, Professor, Lancaster University, UK
Panel Discussion led by Robert Danon, Switzerland, Panelists: Richard Collier, OECD; Jeffery Owens, UK; Akhilesh Ranjan, India
1700-1730 Tea Break

Session: New Taxing Rights - Next Steps
Chairman: Sol Picciotto, Professor, Lancaster University, UK
1730-1900 Continuing Discussion led by Pascal Saint-Amans, OECD, Panelists: Rajat Ranjan Das, India; Vipul Gupta, India; Ridha Hamzaoui, IBFD - France
Panel Discussion led by også Danon, Australia; Mike Williams, Australia; in discussion with questions and comments from the speakers and from the floor
1900-2200 End of Day's Session followed by Cocktails and Dinner

Day Two: December 6, 2019 (Friday)

Session: Impact of Recent Developments on Indian Tax Policy and Objectives
Chairman: Dinesh Kanabar, CEO, Dhruva Advisors LLP, India
0900-0915 Session Chair's Introductory Remarks
0915-0945 Akhilesh Ranjan, Member, Central Board of Direct Taxes, India
Recent Developments in International and Domestic Taxation in India
Chairman: Dinesh Kanabar, Head, Dhruva Advisors LLP, India
1015-1100 Indian Direct Tax Code Update: Recent Developments in International Tax Law and Practice in India
Panel Discussion led by Nishith Desai, Nishith Desai & Co., India; C.P. Casteren, Nishith Desai Associates, Netherlands; Sumantra Niyogi, BDO, India; Monica Bhatia, AFA India
1100-1130 Lunch Break

Chairman: Belema Obuoforibo, Director of Knowledge Centre, IBFD, The Netherlands
1130-1300 Tax Reforms in Africa
Presentation by: Gerhard Njii, Cameroon followed by Panel Discussion led by Annet Wanyana Oguttu, South Africa. Panelists: Ridha Hamzaoui, IBFD - Mustapha Ndajiwjo, Nigeria; Mohamed Ben Mlik, South Africa
Digital Taxation: A Holistic View
Book Launch: Authors - Rashmin Sanghvi, Naresh Ajwani & Rutvik Savant
1300-1400 Lunch Break

Plenary Session: Afternoon
Chairman: Nishith Desai, Founder and Managing Partner, Nishith Desai Associates, India
1400-1430 Monica Bhatia, Indian Revenue Service (previously Head of Global Forum Secretariat, Paris)
Exchange of Information (including on Beneficial Ownership) under Action Thirteen: Some Issues and Comments
Chairman: Robert Danon, Professor at University of Lausanne, Switzerland
1430-1500 Robert Danon, Professor at University of Lausanne, Switzerland
Relevance of Substance in Cross-border Tax Planning
What drives Taxpayers' willingness to pay taxes?
1530-1600 Shikha Mehra, Professor & Consultant, India
Crypto Currencies: Challenges, Risks and Opportunities
1600-1630 Vidushi Gupta, Senior Resident Fellow and Team Leader, Vidhi Centre for Legal Policy, India
Taxes the Digital Economy in India: The Nexus Rule
1630-1700 Sam Sim, Research Fellow, BMU Center for Artificial Intelligence, Singapore
Going the Way of the Polaroid: Death of the OECD MC Article 9(1) Arm's Length Principle
1700-1730 Tea Break

Session: Recent International Tax Decisions on BEPS & MLI (Option A)
Chairman: Mukesh Butani, Trustee, Foundation for International Taxation, India
1730-1930 Post BEPS Treaties and Tax Certainty under Multilateral Instrument: Can Tax Certainty be achieved with a Policy of Tax Abuse Prevention in post BEPS World?
Presentation by: Robert Danon, Professor, Lausanne University, Switzerland & Chair, Permanent Scientific Committee, International Fiscal Association, followed by a Panel Discussion led by Rajesh Ramoll, Mauritius. Panelists: Bijal Ajinkya, India - Srimat Govind, India - Ridha Hamzaoui, IBFD - Rajesh Simhan, India

Session: Allocation of Profits in India and Abroad - Recent Developments under Tax Treaties (Option B)
Chairman: Vijay Mathur, Senior Tax Advisor, PricewaterhouseCoopers, India
1930-2200 End of Day's Session followed by Cocktails and Dinner

Day Three: December 7, 2019 (Saturday)

Session: Tax Dispute Resolution (Morning)
Chairman: Mukesh Butani, Trustee, Foundation for International Taxation, India
0900-1030 Resolution of Tax Disputes in the New International Tax Order
Panel Discussion in the presence of Hon'ble Justice P P Bhat, President, Income Tax Appellate Tribunal, India. Panelists: Rajat Bansal, India - Pramod Kumar, India - Jeffrey Owens, UK - Rajesh Ramoll, Mauritius with concluding remarks by ITAT President
1030-1100 FEEMA Compounding Orders - A Comprehensive Analysis-
Book Launch, Authors: Hardik Mehta, Harshal Bhuta, Tanvi Vora
1100-1130 Tea Break

Session: Global Impact of New Technologies on International Taxation: An Update (Option A)
Chairman: Clive Baxter, Maersk Group, Chief Tax Counsel, Denmark
1130-1330 Likely Implications of the New Technologies on Future Tax Policy and Administration: Presentation by Professor Jeffrey Owens, Vienna WU, Austria on their Impact on (i) Tax Systems, (ii) Tax Administrations, and (iii) Tax Policies of the Future followed by Panel Discussion led by Shikha Mehra, India. Panelists: Monica Bhatia, India - Ranjan Gupta, New Zealand, Sam Sim, Singapore
1330-1330 Pramod Kumar, Vice President, Income Tax Appellate Tribunal, Mumbai
International Tax Dispute Resolution in India – the road travelled and the road ahead
1330-1430 Lunch Break

Session: Tax Dispute Resolution (Afternoon)
Chairman: Mukesh Butani, Trustee, Foundation for International Taxation, India
1430-1630 The Transparency Agenda: Some Current Issues (Option B)
Chairman: Ola Otsaasewa, Head, European Knowledge Group, IBFD
1430-1500 Otsaasewa Kadri, Managing Partner, BDO India LLP, India
An Industry Perspective of the New Taxing Rights in India
1500-1530 Kuntal Dave, Managing Partner, Nambubhar Desai & Co., Mumbai
Impact on Investments in India: Challenges and Opportunities
1530-1600 Dr. (C.A) Sunil Moti Lal, Advocate & Trustee, Foundation for International Taxation, Mumbai
Recent International Tax Precedents in India having Global Significance
1600-1700 Rashmin Sanghvi, Naresh Ajwani & Rutvik Savant
International Tax Precedents in Africa having Global Significance
1700-1730 Rashmin Sanghvi, Naresh Ajwani & Rutvik Savant
International Tax Precedents in India having Global Significance
1730-1815 Rashmin Sanghvi, Naresh Ajwani & Rutvik Savant
International Tax Precedents in Africa having Global Significance
1815-1830 Closing Remarks: Belema Obuoforibo (IBFD) - Rohatgi (FIT)