

Distributed by The India-US Chamber as a courtesy to the IFA and our members.

Dear All,

International Fiscal Association (IFA) is a leading non-governmental international organization dealing with tax matters since 1938. It comprises tax-payers, tax professionals, government officials and university professors and is a unique forum for discussing international tax issues.

IFA is headquartered in the Netherlands and has over 10,000 members worldwide, from 95 countries, with 46 National Branches. IFA is engaged in the study of international laws and policy through scientific research, holding of congresses, publications of its cahiers and other materials and co-operation with other like minded organizations. The recommendations of the IFA Congress are respected by Government the world over. India today has come to occupy centre stage in the development of international tax jurisprudence. Judgments handed out by the Supreme Court, High Courts and Benches of the Tribunals receive careful attention from the international community. Many illuminating judgments are debated at the annual IFA Congresses, held in different parts of the world.

To understand and discuss the complex tax laws, the developments in the field and latest tax jurisprudence, the Northern Regional Chapter of the International Fiscal Association – India Branch, is organizing a two day International Tax Conference titled “International Taxation: India Takes Centre Stage” on 10<sup>th</sup> and 11<sup>th</sup> February, 2012, at Hotel Shangri-La, 18, Ashoka Road, New Delhi.

The Conference would be attended by leading corporates, lawyers, tax practitioners and other professionals, senior Government officials and representatives of the media. The Conference would provide an excellent opportunity for exchange of views and knowledge sharing in the area of international tax policy and administration with well known Indian and international tax practitioners and tax administrators.

The broad programme outline is enclosed for information.

The participation fee is as below:

For Indian Participants:

Non-members Rs. 22,500

IFA Members Rs. 20,000

Government Officials Rs. 10,000

IFA members less than 30 years of age, as on 1.1.2012 Rs. 12,500

For Foreign Participants:

Non IFA-member USD 550

IFA Members USD 450

In case three or more persons from the same organization register, 10% discount shall be allowed.

The cheque/draft should be drawn in favour of “NORTHERN REGION CHAPTER OF INTERNATIONAL FISCAL ASSOCIATION-INDIA BRANCH”.

Please send your duly filled registration form along with the cheque/draft to Mr. S. Sayee Seetha Ram, at the following address:-

Mr. S. Sayee Seetha Ram ,  
Northern India Region Chapter of International Fiscal Association (IFA)  
C/o SGC Services Pvt. Ltd.  
C-43, Sector 8, Noida 201 301

For further details contact :

Ajay Vohra

Chairman

International Fiscal Association – India Branch  
Care : Vaish Associates, Advocates  
Flat # 5-7 | 10 Hailey Road | New Delhi 110001 (India)  
Phone: +91 11 42492525 (Board)

Fax: +91 11 23320484

We request you to disseminate this information widely and encourage participation in this important conference.

Please circulate this information amongst members of your Chamber and other relevant organizations and individuals.

**INTERNATIONAL TAXATION - INDIA TAKES CENTRESTAGE**  
**International Tax Conference organized by**  
**Northern Region Chapter of International Fiscal Association – India Branch**  
**Hotel Shangri-La, New Delhi**  
**February 10-11, 2012**  
**TENTATIVE PROGRAMME**

**DAY 1**

08.45-09.30	Registration
09.30-10.30	Inaugural Session
9.30-9.40	Welcome address – Mr. O.P. Vaish, Hony. President, IFA India
9.40-9.50	Theme Address – Mr. Ajay Vohra, Chairman – IFA India Branch
9.50-10.05	Key note address – Chairman, Central Board of Direct Taxes*
10.05-10.25	Inaugural address – Mr. Salman Khursheed, Minister for Law & Justice*
10.25-10.30	Vote of thanks – Mr. V P Gupta, Chairman, IFA, NRC
10.30-10.45	Tea break
10.45-12.45	<b>First Technical Session – Recent trends in international tax</b>
	Panel discussion on issues, impact and learnings from decisions in cases of Vodafone, Aditya Birla Nuvo, Richter Holdings, etc.  Chairman :Mr. R. N. Dash, Director General (International Taxation)*  Moderator: Mr. Mukesh Butani, BMR Advisors* Panelists: Mr. Couldip Lala, International Financial Services, Mauritius* Mr. Nishith Desai, Nishith Desai & Associates Mr. Girish Dave, Advocate Mr. Ned Shelton, Sheltons, Denmark*
12.45 – 14.00	<b>Luncheon Session – Education Revolution: Need of the Hour</b> Mr. Sam Pitroda, Advisor to the Prime Minister of India, on Public Information Infrastructure & Innovations*
14.00 – 15.45	<b>Second Technical Session – Anti- Avoidance Measures</b>
14.00 – 14.05	Chairman : Mr. G. E. Veerabhadrapa, President, ITAT*
14.05 – 14.35	Interplay/conflict between GAAR and Treaty provisions Speaker: Mr. Al Meghji, Osler, Hoskin & Harcourt LLP, Canada
14:35 – 15.00	GAAR: Recent Developments in U.K. Ms. Heather Gething, Herbert Smith LLP, U.K.
15.00 – 15.25	Proposed Indian GAAR- Areas of concern Speaker: Mr. T. P. Ostwal, T. P. Ostwal & Associates
15.25 – 15.45	Proposed CFC Regulations- implications and unintended results Speaker: Ms. Daksha Baxi, Khaitan & Co.
15.45 – 16.00	Tea break
16.00 – 17.45	<b>Third Technical Session – Tax Treaty Issues</b>
16.00 – 16.10	Chairman: Justice D K Jain, Supreme Court of India*
16.10 – 16.45	Latest UN developments Speaker: Mr. Michael Lennard U.N. Dept. of Economic and Social Affairs *
16.45 – 17.15	Recent significant decisions /developments in international taxation: Speakers: Mr. Rupesh Jain, Vaish Associates, Advocates
17.15 - 17.45	Mr. Pieter de Ridder, Loyens & Loeff, Singapore

DAY 2

09.30 - 11.30	<b>Fourth Technical Session – Transfer Pricing-I (Issues and Controversies)</b>
09.30 – 09.40	Chairman: Justice Swatanter Kumar, Supreme Court of India*
09.40 – 10.15	Transfer pricing of intangibles: Methods, approaches and issues- Speaker: Mr. Marc Levey, Baker & McKenzie, U.S.A.
10.15 – 11.30	Panel discussion – Transfer pricing controversies Moderator: Mr. Shyamal Mukherjee, Pricewaterhousecoopers Panelists: Ms. Manisha Pande, GE India Mr. Dinesh Gupta, DIT (Transfer Pricing)* Mr. S.P. Singh, Deloitte Mr. Neeraj Jain, Vaish Associates, Advocate Mr. Sanjiv Chaudhary, KPMG
11.30 – 11.45	Tea break
11.45 – 13.15	<b>Fifth Technical Session – Transfer Pricing-II (Recent Developments)</b>
11.45 – 11.55	Chairman: Justice Dipak Misra, Supreme Court of India*
11.55- 12.25	Recent Significant Foreign Rulings Speaker: Ms. Heather Gething, Herbert Smith LLP, U.K.
12.25 – 12.50	Safe harbors and APAs: International Experience Speaker: _____
12.50 – 13.15	Safe harbors and APAs: Indian Scenario Speaker: Mr. Sanjay Mishra, Joint Secretary (FT&TR-I) Ministry of Finance*
13.15 – 14.30	<b>Luncheon Session – Weeding out the malice of corruption</b> Panelists - Justice Markandey Katju, Chairman, Press Council of India* Mr. Soli Sorabjee, Senior Advocate Mr. Bibek Debroy, Economist* Mr. Paranjoy Guha Thakurta, Journalist* Moderator – Mr. Sukumar Ranganathan, Editor MINT
14.30 – 15.45	<b>Sixth Technical Session – Issues in taxation of unincorporated entities with Foreign participation</b>
	Chairman: Justice Sanjiv Khanna, High Court of Delhi*  Moderator: Mr. Padam Khincha, H. C. Khincha & Co. Panelists: Mr. Rahul Garg, Pricewaterhousecoopers Mr. Gokul Chaudhri, BMR Advisors Ms. Neeru Ahuja, Deilotte Ms. Pallavi Bakhru, Grant Thornton*
15.45-16.00	Tea break
16.00 – 17.45	<b>Seventh Technical Session – Avoidance of disputes</b>
16.00 – 16.10	Chairman: Justice T. S. Thakur, Supreme Court of India*
16.10 – 16.40	Dispute Resolution Mechanism- International approaches Speaker: Gurbachan Singh, KhattarWong, Singapore
16.40 – 17.10	Arbitration under Tax Treaties Speaker: Mr. Joe Andrus, OECD, France
17.10 – 17.45	Improving the Justice Delivery Mechanism- need of the hour? Speaker: Mr. Gopal Subramaniam, Senior Advocate*
17.45 – 18.00	Closing remarks and conference wrap up- Mr. Ajay Vohra, Chairman IFA India Branch

\* Confirmations Awaited

REGISTRATION FORM



**“INTERNATIONAL TAXATION - INDIA TAKES CENTRESTAGE”**  
**International Tax Conference organized by**  
**Northern Region Chapter of International Fiscal Association-India Branch**  
**Hotel Shangari-La, New Delhi**  
**February 10-11, 2012**

Name:.....Age: .....

Company/Firm Name:.....

Mailing Address: .....

IFA M'ship No.:.....Tel: (O)..... (R) .....

Fax..... Mobile..... Email ID .....

**Detail of Payments:-**

Draft/Cheque No..... Dated.....

Drawn on .....Bank for Rs.....

[.....] (in words) or

bank transfer through our Bank HSBC A/c No. No.051-163483-006, Birla Towers, 25, Barakhamba Road, New Delhi 110 001, India, with advice to us.

**PAN NO. AAATI2788P**

**Signature**

**Note:**

1. Please use block letters, preferably typewritten and fill complete details.
2. Outstation members should pay by Demand Draft, payable at New Delhi.

<b><u>Fees:</u></b>	<b>IFA Members:</b>	Rs.20,000/- per delegate
	<b>Non IFA Members:</b>	Rs.22,500/- per delegate
<b>IFA members less than 30 years of age as on 1.1.2012</b>		Rs.12,500/- per delegate
	<b>Participation from Government officials</b>	Rs.12,500/- per delegate

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<b>IFA Members</b>	USD 450

3 participants from same organization will get 10% discount

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**Notes:**

1. For registration please contact: Mr. S.Sayee Seetha Ram (email: [sai@sgcservices.com](mailto:sai@sgcservices.com), [ifaindia@vaishlaw.com](mailto:ifaindia@vaishlaw.com) Phone: 0120-4949100, 4723400, 9999598238,9810239990)
  2. Interested members may send the attached Registration Form along with the cheque/draft to the following address:  
**Mr. S.Sayee Seetha Ram, Northern Region Chapter of International Fiscal Association (IFA), C/o. SGC Services Pvt. Ltd., C-43, Sector-8, Noida, U.P. – 201 301**
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