



FIT-IBFD International Taxation Conference

Reshaping the International Tax Architecture
in an Era of Multilateralism

ITC Maratha, Sahar, Mumbai
4 & 5 December 2023

Technical Programme
All times shown are Indian Standard Time



Visit us at www.ibfd.org

Day 1: Monday, 4 December 2023

09:00 – 10:30

Opening Ceremony (1 hour and 30 minutes)

Official Opening

- **Belema Obuoforibo**
*Director, IBFD Knowledge Centre
Chair, Centre for Studies in African Taxation
Member, IBFD Executive Board*

- **Mukesh Butani**
*Managing Partner, BMR Legal
Member, FIT Board of Trustees*

Special Event: Commemoration of Professor Roy Rohatgi and a Quarter Century of FIT

- **Mukesh Butani**
*Managing Partner, BMR Legal
Member, FIT Board of Trustees*

- **TP Ostwal**
*Founder,
TP Ostwal & Associates LLP*

Welcome Address

- **Porus Kaka**
*Senior Advocate (India), Barrister (England & Wales)
Member, IBFD Board of Trustees
Hon. President, IFA*

Keynote Speech

- **Hon. Justice A.K. Sikri**
*Eminent Jurist & Former Judge,
Supreme Court of India
International Judge,
Singapore International Commercial Court,
Supreme Court of Singapore*

10:30 – 11:00

Tea Break (30 minutes)

Session 1

11:00 – 12:30

Evolving Trends in Global Taxation

(1 hour 30 minutes)

Chair:

- **Dr. Veerinderjeet Singh**
Member, IBFD Board of Trustees

Presentation:

- **Yvette Nakibuule Wakabi**
*Senior Associate,
Africa & the Middle East Knowledge Group, IBFD*

Panel Leader:

- **Dinesh Kanabar**
*Chief Executive Officer,
Dhruva Advisors*

Panelists:

- **Rasmi Ranjan Das**
*Chief Commissioner of Income Tax,
Ministry of Finance,
Government of India*
- **Prof. Annet Wanyana Oguttu**
*Professor of Tax Law,
Department of Taxation and the African Tax Institute,
University of Pretoria*

12:30 – 13:00

Luncheon Address: The United Nations and Its Role in Global Tax Policymaking (30 minutes)

- **Michael Lennard**
*Chief, International Tax Cooperation Section,
Financing for Sustainable Development Office,
Department of Economic and Social Affairs,
United Nations*

13:00 – 14:00

Lunch Break (1 hour)

Programme continues on next page

Session 2

14:00 – 15:30

Latest Developments in Indian Taxation – Practical Controversies and Cross-Border Issues (1 hour 30 minutes)

Chair:

- **Raman Chopra**
*Joint Secretary, Tax Policy & Legislation,
Department of Revenue,
Government of India*

Panel Leader:

- **Shefali Goradia**
*Chairperson,
Deloitte India*

Panelists:

- **H. Padamchand Khincha**
*Partner,
H C Khincha & Co, Bangalore*
- **Ameya Kunte**
*Founder,
Globeview Advisors LLP*
- **Shreya Rao**
*Tax Partner,
AZB & Partners*

15:30 – 16:00

Tea Break (30 minutes)

Programme continues on next page

Session 3

16:00 – 17:40

Preparing for the Global Minimum Tax – Challenges for Businesses and Tax Practitioners (1 hour 40 minutes)

Chair:

- **Rebecca Roes**
Member, IBFD Board of Trustees

Panel Leader:

- **Alex Law**
*Tax Leader,
Deloitte Middle East*

Presentation: GloBE in 2023: Overview of Critical Developments

- **Rachel Saw**
*Head, IBFD Asia Pacific Knowledge Group
Chair, IFA Malaysia*

Panelists:

- **Prof. Dr. Vikram Chand**
*Professor of International Tax Policy,
University of Lausanne*
- **Prof. Yvette Lind**
*Professor of Law,
Department of Law and Governance,
BI Norwegian Business School*
- **Dr. Amar Mehta**
*International Taxation Expert,
Advisor, Commentator & Author*
- **Dr. Achim Pross**
*Deputy Director,
OECD Centre for Tax Policy and Administration*
- **Chetan Rao**
*Commissioner of Income Tax,
Foreign Tax & Tax Research,
Department of Revenue,
Government of India*

17:40 – 17:45

Closing Remarks (5 minutes)

- **Belema Obuoforibo**
*Director, IBFD Knowledge Centre
Chair, Centre for Studies in African Taxation
Member, IBFD Executive Board*

Day 2: Tuesday, 5 December 2023

08:55 – 09:00

Opening Remarks (5 minutes)

- **Mukesh Butani**
Managing Partner, BMR Legal
Member, FIT Board of Trustees

Session 4

09:00 – 10:30

Transfer Pricing – Practical Considerations for Indian Businesses (1 hour 30 minutes)

Chair:

- **Eric Mehta**
Partner,
PwC

Panel Leader:

- **Monique van Herksen**
Partner,
Simmons and Simmons,
The Netherlands

Presentation: Current Global Controversies in Transfer Pricing

- **Anuschka Bakker**
Head, IBFD Transfer Pricing Department
Deputy Director, IBFD Knowledge Centre

Panelists:

- **Rajat Bansal**
Chief Commissioner of Income Tax,
CBDT, Department of Revenue,
Government of India
- **Shikha Gupta**
Tax Director, South Asia
Hindustan Unilever Limited
- **Vijay Iyer**
Transfer Pricing Leader,
Ernst & Young India

10:30 – 11:00

Tea Break (30 minutes)

Session 5

11:00 – 12:30

Taxation of Cross-Border Activities – Current Tax Treaty Issues (1 hour 30 minutes)

Chair:

- **Rachel Saw**
Head, IBFD Asia Pacific Knowledge Group
Chair, IFA Malaysia

Panel Leader:

- **Walter Andreoni**
Partner,
Mercanti e Associati, Italy

Presentation: Overview of Global Developments

- **Ola Ostaszewska**
Head, IBFD Europe Knowledge Group
Deputy Director, IBFD Knowledge Centre

Panelists:

- **Bijal Ajinkya**
Partner, Direct Tax & Private Client Practice,
Khaitan & Co
- **H. Padamchand Khincha**
Partner,
H C Khincha & Co, Bangalore
- **Dr. Dhruv Janssen-Sanghavi**
Leader, International Tax and Litigation,
Nishith Desai Associates
- **Seema Kejriwal Jariwala**
Partner, International Tax & Transfer Pricing,
BMR Legal

12:30 – 13:00

Special Address: The Future of Global Tax Policymaking (30 minutes)

- **Dr. Achim Pross**
Deputy Director,
OECD Centre for Tax Policy and Administration

13:00 – 14:00

Lunch Break (1 hour)

Session 6

14:00 – 15:40

Emerging Technologies – Challenges and Prospects for the Tax Advisor (1 hour 40 minutes)

Chair:

- **Parul Jain**
*Head,
International Tax Practice,
Nishith Desai Associates*

Presentation:

- **Prof. Liz Chien**
*Professor of International Tax Law,
University of California College of the Law*

Panel Leader:

- **Uday Pimprikar**
*Head of Indirect Taxes,
Ernst & Young India*

Panelists:

- **Ravi Chatlani**
*Associate,
Knowledge Centre, IBFD*
- **Prof. Dr. Claudio Cipollini**
*Professor of Tax & Technology,
University of Amsterdam*
- **Dr. Achim Pross**
*Deputy Director,
OECD Centre for Tax Policy and Administration*
- **Gouri Puri**
*Partner,
Digital Taxation,
Shardul Amarchand Mangaldas*

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Session 7

15:40 – 16:40

The Emerging Global Tax Landscape – An Overview of the Indian Position (1 hour)

Chair:

- **TP Ostwal**
Founder,
TP Ostwal & Associates LLP

Panel Leader:

- **Sanjay Tolia**
Partner,
PwC India

Panelists:

- **Dr. Amar Mehta**
International Taxation Expert,
Advisor, Commentator & Author
- **Nidhi Kansal**
Partner,
Corporate & International Taxation,
BSR & Co. LLP
- **Malathi Sridharan**
Chief Commissioner of Income Tax,
Western Zone, Mumbai,
Government of India

16:40 – 16:50

Concluding Comments (10 minutes)

- **Belema Obuoforibo**
Director, IBFD Knowledge Centre
Chair, Centre for Studies in African Taxation
Member, IBFD Executive Board
- **Mukesh Butani**
Managing Partner, BMR Legal
Member, FIT Board of Trustees

End of Programme