

# INTERNATIONAL TAX REVIEW™

with speakers from

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institute

# Asia Tax Executives' Forum 2011

May 11-12, 2011 • Raffles Singapore



## Day 1 - Wednesday 11th May

**08.00 Registration and breakfast**

**08.40 Chair's opening remarks**

Ralph Cunningham, *Managing Editor, International Tax Review*

**08.45 Welcome**

Anthony Fay, *President, Asia Chapter, TEI*

**08.55 Regional tax issues in 2010/2011: The developments in Asia-Pac that will affect you**

- New treaty interpretation: beneficial ownership, treaty shopping etc.
- M&A focus: what are the new issues?
- Effective tax planning
- New issues in taxation of business restructuring
- Efficiency of competent authority and mutual agreement procedure

Eric Roose, *Partner, Morrison & Foerster* (moderator)

Amit Gupta, *Director - Tax, Asia Pacific and Japan, Dell*

Pieter de Ridder, *Partner, Loyens & Loeff*

Miaw Hui Goh, *Asia Pacific Tax Director, United Technologies Group*

**10.10 Tea and coffee**

**10.30 Tax administrators' forum: Creating the right relationship between taxpayers and officials**

- New legislation on the way and how the tax authorities will deal with it
- Changes in auditing practice
- Anti-avoidance initiatives
- Cooperation with other jurisdictions
- International plans for joint audits: Is Asia involved?
- Availability of rulings

Veerinderjeet Singh, *Managing Director, Taxand Malaysia* (moderator)

Choy-Koh Kum Lin, *Tax Director, Corporate Tax (Large Businesses), Inland Revenue Authority of Singapore*

Yon Arsal, *Head of Technical Support and Consultation Division, West Java I Regional Tax, Directorate General of Taxes, Republic of Indonesia*

**11.45 China: Keeping up with a changing tax landscape**

- Update on key circulars, eg. 79, 601, 698
- GST in 2013: What you should be doing to prepare now
- Tax treaty network and how it compares to international norms
- What to learn from an emerging disputes system: focus on public cases, eg the Shandong Case
- Taxation of representative offices

Peter Guang Chen, *Vice President, Asia Pacific, Charles River Associates* (moderator)

Stanley Huang, *Greater China Tax Director, HP China*

Peter Yongjun Ni, *Partner, Zhong Lun Law Firm*

Eugene Gay, *Head of Tax, Asia Pacific, GlaxoSmithKline*

**1.00 Lunch**

**2.00 South-east Asia focus: Dealing with developing tax systems**

- How to react to new anti-avoidance measures
- What Vietnam is doing to develop its tax system
- Indonesia's new transfer pricing regime
- Lessons from key tax cases in Malaysia
- Developments in the Philippines & Singapore
- Accounting for taxes

Prijohandojo Kristanto, *Chairman, Taxand Indonesia* (moderator)

Morrie Cheng, *Asia Head of Tax, Sun Life Financial*

Leon Kwong Wing, *Partner, Taxand Singapore*

Martin Ignacio Mijares, *Partner, Taxand Philippines*

Michael Palumbo, *Asia-Pacific Tax Director, Baker Hughes*

Stephen Tai, *Country Tax Manager, South East Asia and South Asia, Intel*

**3.15 Tea and coffee**

**3.45 Transfer pricing: New thinking about the arm's-length principle**

- Documentation policy and practice update
- Use of comparables in different jurisdictions
- Litigation in other parts of the world and the new issues it is highlighting
- How you can make sure you avoid controversy and how to resolve it
- Advance pricing agreements: Which jurisdictions have added them in the last year? What can be learned from how they work in other countries?

Gary Thomas, *Partner, White & Case* (moderator)

Yin Chao, *Tax Manager - Transfer Pricing, Siemens*

Tobey Hill, *Vice President, Asia-Pacific Regional Tax Manager, Citigroup*

Sharon Tan, *Senior Tax Director - Asia Pacific, Nike*

Michael Quigley, *Partner, White & Case*

**5.00 Chair's closing summary**

**5.10 Cocktail reception**

## Day 2 - Thursday 12th May

08.30 Registration and breakfast

09.00 Chair's opening remarks

Ralph Cunningham, *Managing Editor, International Tax Review*

09.10 International tax developments: The tax rules overseas that will have an impact in Asia

- US Budget proposals and their effect on international tax
- What should be in an overhaul of the US corporate tax system
- Selected US outbound tax planning strategies
- OECD Developments and their relevance for Asia
- FATCA – the impact of the new regulations

Steve Towers, *Asia Pacific Leader, International Tax, Deloitte* (moderator)

Aaron Grundman, *US International Tax Partner, Asia Pacific International Centre of Excellence, Deloitte*

Robert Lider, *Executive Director, Asia Corporate Tax, JP Morgan Chase*

David Weisner, *US Tax Counsel, Citigroup*

10.25 Tea and coffee

10.45 India: Updating your knowledge of a key tax regime

- Full steam ahead with the Direct Taxes Code? What remains to get right?
- The implications for taxpayers of the introduction of IFRS
- What is left to be done before national GST arrives
- India, the OECD and tax treaties
- Key rulings from the AAR and the courts: permanent establishment; withholding tax; transfer pricing

Ajay Kumar, *Executive Director, PwC* (moderator)

Sunil Dhareshwar, *Head of Tax - Asia, News Corporation*

Rajeev Dimri, *Head of Indirect Tax, Taxand India*

Rahul Garg, *Executive Director, PwC*

Anuj Gupta, *Vice President - Tax, GE Capital India*

Sanjay Tolia, *Executive Director, PwC*

12.00 Lunch

1.00 Dispute resolution: Turning a contentious tax issue into a success

- New ideas to avoid an audit turning into a dispute
- Changing attitudes at official level to disputes: more conciliatory?
- Different forms of dispute resolution: what are they and do they have a future?
- Lessons from key cases throughout the region

Mukesh Butani, *CEO, Taxand India* (moderator)

Rahul Garg, *Executive Director, PwC*

Andrew Windheim, *Asia Pacific Tax Director, JP Morgan Chase*

Bill Hushwaite, *Regional Tax Manager, Asia Pacific, Shell Eastern Petroleum*

2.15 Tea and coffee

2.45 Permanent establishment: Determining the boundaries of a taxable base

- New ideas on minimising risk
- How policy is changing at official level
- New issues in permanent establishment and transfer pricing
- What is to be learned from 2010/2011's key rulings

Steven Sieker, *Partner, Baker & McKenzie* (moderator)

Edmund Leow, *Principal, Baker & McKenzie*

4.00 What is tax technology and why it is important?

Charlotte Rushton, *Senior Vice President and Managing Director, Asia Income Tax, Thomson Reuters*

Stephen Simi, *Director, US West Region Operations – ONESOURCE Tax Provision, Thomson Reuters*

5.15 Chair's closing summary

5.20 End of conference

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