

# Bombay Chartered Accountants' Society

## International Taxation Committee

Chairman: CA Mayur Nayak

Convenors: CA Deepak Kanabar, CA Rutvik Sanghvi, CA Siddharth Banwat

Co-ordinator: CA Namrata Dedhia

## 23<sup>rd</sup> International Tax & Finance Conference, 2019

The International Taxation Committee is pleased to announce its 23<sup>rd</sup> Residential International Tax & Finance Conference at the Hotel WESTIN, Hitec City, Hyderabad.

It is always an endeavor of BCAS to keep its members abreast of latest developments in the field of International Taxation and Finance. Keeping this objective in mind, this year's ITF Conference is designed on the theme of BEPS & Multilateral Instrument (MLI).

The conference will be focused on fast changing landscape through developments in international taxation principles and laws. The group discussion papers will cover subjects under the broad framework of BEPS & MLI comprising of:

- (i) Treaty Abuse – Covered Tax Agreements & Simplified LOB,
- (ii) Avoidance of PE Status and
- (iii) Case Studies on MLI.

A panel discussion on relevance of arm's length principle post BEPS implementation & MLI will be an interesting one. For the first time an “**All Women Panel**” discussion is planned; where case studies on international taxation in the post BEPS & MLI era (a mixed bag) will be discussed at an advanced level.

A presentation is planned to delve into new age practice opportunities for professionals by understanding the concepts and impact on tax and compliance practice arising out of emerging technologies such as Blockchain, Artificial Intelligence, Robotics and Data Analytics.

**The conference details are as under:**

**Days & Dates:** Thursday, 8<sup>th</sup> August 2019 to Sunday, 11<sup>th</sup> August 2019

**Venue:** WESTIN Hotel, Raheja IT Park Hitec City, Madhapur, Hyderabad, Telangana.

## Subjects & Paper Writers:

Key Note Address:

**What is MLI and how it alters Tax Scenario – Shri Akhilesh Ranjan\***

### Part I Papers for the Group Discussion

<b>Sr. No.</b>	<b>Topic</b>	<b>Paper Writers/ Speakers</b>
1	TREATY ABUSE – PPT, SIMPLIFIED LOB & GAAR (Articles 6 & 7 of MLI & BEPS Action Plan 6) (Including: LOB v. Simplified LOB; PPT – Principal Purpose Test & GAAR; Substance over Form with developments in Indian Tax Laws; Treaty Override)	CA Geeta Jani
2	AVOIDANCE OF PE STATUS (Articles 12 TO 15 of MLI & BEPS Action Plan 7) <ul style="list-style-type: none"><li>- Provisions to tackle Commissionaire Arrangements – how do they impact India?</li><li>- Changes in Indian Tax Laws under section 9 (Significant Economic Presence &amp; DAPE)</li><li>- Artificial Avoidance of PE through Splitting up of Contracts and other methods</li><li>-</li></ul>	CA Gautam Doshi
3	Advanced Case Studies on Multi-Lateral Instruments (MLI)	CA Padamchand Khincha and Adv. K. K. Chythanya

### Part II Panel Discussions:

4	<b><u>ALL WOMEN PANEL DISCUSSION</u></b> on Case Studies in International Taxation post BEPS and MLI (Mixed Bag)	<b><u>Moderator</u></b> Ms. Shefali Goradia <b><u>Panellists:</u></b> Ms. Bijal Ajinkya Ms. Aashish Kasad Ms. Manisha Pande
5	Panel Discussion on “Recent Developments in Transfer Pricing post BEPS and MLI”	<b><u>Moderator</u></b> CA T. P. Ostwal <b><u>Panellists:</u></b> CA Darpan Mehta Dr. Hasnain Shroff

## Part III Paper for Presentation

<b>6</b>	Blockchain Technology and Artificial Intelligence, Robotics and Data Analytics (Concepts and Impact on Tax Practice)	CA Darpan Mehta & Industry Expert
* Confirmation awaited		

### Fees:

Date	Early-bird rate up to 10 <sup>th</sup> June 2019	From 11 <sup>th</sup> June 2019
Fees	₹ 19,000/- + ₹ 3,420/- (GST) = ₹ 22,420/-	₹ 21,500/- + ₹ 3,870/- (GST) = ₹ 25,370/-

Any member who is interested in single occupancy is requested to contact the BCAS office for special rates.

The above fees include course material, stay on twin-sharing basis, meals and Rs. 50/- contribution to the BCAS Foundation but exclude travel arrangements.

### Travel Distance from/to Airport:

Hotel Westin is about 32 kms from the Hyderabad Airport.

### Eligibility:

The Conference is open only for those who are Ordinary/Life/Corporate Members of BCAS at the time of enrolment and not for **Journal Subscribers and Website Members of BCAS**.

### Note:

- **Enrolment will commence from 25<sup>th</sup> April, 2019** and will be **restricted to 175 members** of BCAS only on first-come-first-served basis. **Some seats are reserved for outstation delegates.**
- The Conference will begin in the afternoon on Thursday, 8th August 2019 with Lunch and will conclude at around 14.00 hrs. after Lunch on Sunday, 11th August 2019. The Hotel's check-in time is **1.00 pm** onwards on Thursday, 8th August, 2019.
- All communication from BCAS would be only by e-mail and SMS. Hence, please fill in the e-mail address and mobile number carefully and in legible writing.
- Cheques/Demand Draft should be drawn in favour of "**Bombay Chartered Accountants' Society**" payable at par at Mumbai.
- For enrolment and any other Conference related issues, please contact Mr. Javed in BCAS Office on 022-61377607.
- No request for cancellations will be entertained, however, substitution of participant may be allowed with prior permission of the Committee. The substituted person must be a member of the BCAS. The decision of the Committee shall be final in respect of cancellation and/or substitution. ■

**BOMBAY CHARTERED ACCOUNTANTS' SOCIETY  
INTERNATIONAL TAX & FINANCE CONFERENCE, 2019  
ENROLMENT FORM**

Notes:

1. Please use block letters and fill complete details. A form with incomplete details will not be accepted. Preferably, type out the form.
2. Photograph is must for issue of Photo ID card for the Conference.
3. Please enclose photocopy of Proof of ID PAN / Driving License / Voter ID /Passport and carry the original of the same ID with you to facilitate speedier check-in at the Hotel.
4. Outstation members should pay by Demand Draft/Cheques 'at par' only payable at Mumbai.
5. Enrolment is open only to Ordinary, Life members and Corporate Members of BCAS and not to Journal and Website members of BCAS.

<b>BCAS Membership No.</b>	
<b>Name (Mr. /Ms.)</b>	
<b>Age</b>	
<b>Firm/Company Name</b>	
<b>GSTIN</b>	
<b>Mailing address</b>	
<b>Tel.</b> <b>(O)</b> <b>(R)</b> <b>(F)</b> <b>(Mobile)*</b>	
<b>Email*</b>	
<b>Choice of Food</b>	<input type="checkbox"/> Jain <input type="checkbox"/> Veg. <input type="checkbox"/> Non-veg. <input type="checkbox"/>

<b>Choice of Room Partner</b>	
<b>Proof of ID</b> (Kindly include a copy/scan of ID proof with enrolment form)	<input type="checkbox"/> PAN <input type="checkbox"/> Driving License <input type="checkbox"/> Voter ID <input type="checkbox"/> Passport <input type="checkbox"/> Aadhar Card
<b>I would like to lead the group discussion for the paper (please tick any one only)</b>	<input type="checkbox"/> Group Discussion Paper 1 <input type="checkbox"/> Group Discussion Paper 2 <input type="checkbox"/> Group Discussion Paper 3
<b>Payment Details:</b>	
<b>Demand Draft/Cheque No.</b>	
<b>Dated</b>	
<b>Drawn on Bank</b>	
<b>Rs.</b>	
<b>Rupees in words</b>	

**\*Kindly fill in mobile number & email address carefully and legibly to enable proper and prompt communication.**

**I understand and acknowledge that:**

- In the event of my inability to attend the Conference for any reason, I will promptly inform the Committee and will not substitute any other person to attend the Conference in my place without prior permission of the Committee. I understand that the Committee reserves the right not to admit any person to the Conference in the event I substitute him/her in my place without complying proper procedure.
- I will not change the room allotted to me without the consent of the organisers.
- Claim for refund will not be entertained and that the Committee's decision in this respect shall be final.

\_\_\_\_\_  
Signature