



INTERNATIONAL TAX RESEARCH  
AND ANALYSIS FOUNDATION

**ITRAF Annual Conference (Webinar)  
International Taxation: Emerging Landscapes  
10-11 December, 2021**

**A. Agenda**

<b>S. No.</b>	<b>Title of Paper</b>	<b>Speaker/Author</b>	<b>Session (p. m. IST)</b>
<b>Day 1, 10<sup>th</sup> December, 3:00-8:00 p. m. Indian Standard Time (IST)</b>			
<b>1</b>	<b>Introduction—Prevailing Dilemma in the Formulation of International Taxation</b>	Parthasarathi Shome Chairman, ITRAF	03:00 – 03:25
	<b>Chair</b>	Johann Hattingh Professor, University of Cape Town, South Africa and Chief Editor, Bulletin for International Taxation, IBFD	03:25 – 03:40
<b>2</b>	<b>Global Corporate Tax--Impact on Developing Countries</b>	K. R. Girish Founder, K. R. Girish Associates, India	03:40 – 04:05
	<b>Chair</b>	Mukesh Butani Managing Partner, BMR Legal, India	04:05 – 04:20
<b>3</b>	<b>National Tax Policies and Challenges of Digitalization and Climate Change</b>	Yvette Lind Assistant Professor, Copenhagen Business School, Denmark	04:20 – 04:45
	<b>Chair</b>	Nigam Nuggehalli Registrar, National Law School of India University (NLSIU), India	04:45 – 05:00
<b>4</b>	<b>Taxation of the Gig Economy</b>	Karnik Gulati Manager (Tax and Regulatory), Coinmen Consultants LLP, India	05:00 – 05:25
	<b>Chair</b>	Krupa Venkatesh Chief Catalyst (Tax and Technology), Consark Advisory Services LLP, India	05:25 – 05:40
	<b>Release of new book by K. R. Sekar</b>		05:40 – 05:50
<b>5</b>	<b>UN and OECD--Contribution of Profits for Revenue Shares</b>	K. R. Sekar Partner - Tax, Deloitte, India	05:50 – 06:15
	<b>Chair</b>	Parthasarathi Shome	06:15 – 06:30
<b>6</b>	<b>UN Model Tax Convention--Effects on Developing Countries</b>	Rohit Roy Assistant Professor, Christ (Deemed to be University), India	06:30 – 06:55
	<b>Chair</b>	Indraneel Roy Chaudhury Partner - Tax, PwC, India	06:55 – 07:10

7	<b>OECD Pillar One and Pillar Two-- Conflicts for Developing Countries</b>	Leandro Passarella Professor, Universidad Torcuato Di Tella (UTDT), Argentina	07:10 – 07:35
	<b>Chair</b>	Hitesh Gajaria Partner - Tax, KPMG, India	07:35 – 07:50
<b>Day 2, 11<sup>th</sup> December, 3:00-8:00 p.m. Indian Standard Time (IST)</b>			
1	<b>Tax Challenges from Financial Innovations--A Case Study of Special Purpose Acquisition Companies (SPACs)</b>	Suranjali Tandon Assistant Professor, National Institute of Public Finance and Policy (NIPFP), India	03:00 – 03:25
	<b>Chair</b>	K. R. Sekar	03:25 – 03:40
2	<b>Consumers, Value Creation and Nexus: The Indian experience in International Taxation</b>	Nigam Nuggehalli	03:40 – 04:05
	<b>Chair</b>	H. Padamchand Khincha Partner, H C Khincha & Associates, India	04:05 – 04:20
3	<b>Refining India's GST--Law and Implementation</b>	Krupa Venkatesh	04:20 – 04:45
	<b>Chair</b>	P. V. Srinivasan Corporate Advisor, PVS Advisors, India	04:45 – 05:00
4	<b>Arbitration and International Tax Dispute Resolution--India's Approach Moving Forward</b>	Aditya Vora Advocate, India LLM Tax Law, London School of Economics	05:00 – 05:25
	<b>Chair</b>	Hans Mooij Chairman, Tribute (Tax), Netherlands	05:25 – 05:40
	<b>Release of new book by Parthasarathi Shome</b>		05:40 – 05:50
5	<b>Faceless Assessment</b>	S. Krishnan Independent Consultant, India	05:50 – 06:15
	<b>Chair</b>	P.V.S.S. Prasad Partner, Prasad & Prasad CA, India	06:15 – 06:30
6	<b>India's Change in Position on the Application of Retrospective Taxation</b>	Philip Baker Queen's Counsel and Professor, Oxford University, UK	06:30 – 06:55
	<b>Chair</b>	Parthasarathi Shome	06:55 – 07:10
7	<b>Taxation in Indian Economy: Going Forward</b>	Suresh Senapaty Former CFO, Wipro Limited, India	07:10 – 07:35
8	<b>Chair</b>	T. V. Mohandas Pai Chairman, Manipal Global Education Services (MaGE), India	07:35 – 07:50
9	<b>Display of ITRAF Books</b>		07:50 – 08:00



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## **B. Registration**

**ITRAF's** Annual Conference (Webinar) on 10-11 December, 2021, is accessible from around the world via Zoom (registration is required).

### **Registration**

Participants may enrol for this conference as early as possible reflecting limited seats on Zoom platform. Please fill in the Registration form attached to confirm your seat.

**Please see the registration link below:**

[https://deloitte.zoom.us/webinar/register/WN\\_dmB5TITETQu4uujfTbB\\_TQ](https://deloitte.zoom.us/webinar/register/WN_dmB5TITETQu4uujfTbB_TQ)

### **Registration fee:**

For India Residents - Rs. 3000 (inclusive of GST)

For International Participants - US\$ 40 or UK£ 30 (inclusive of GST)

### **Payment only by e-transfer to ITRAF account:**

1. Bank details for electronic transfer to **ITRAF account:**

Beneficiary: International Tax Research and Analysis Foundation

Bank Name: HDFC Bank Ltd

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IFSC Code: HDFC0001208

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Bank Address: 70/2, Millers Road, Bangalore - 5600052

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### **Please share your payment details to:**

Mrs. Mary Hilna Paul – maryhilna@itraf.org

or

Mrs. Hema Muralidhar – hmuralidhar@deloitte.com

**Zoom link to join the Webinar will be sent to participants as soon as payment is received.**

## C. Speaker Profiles



**Dr Philip Baker** is Queen's Counsel, Field Court Tax Chambers, Gray's Inn, London, and Visiting Professor at the Law Faculty, University of Oxford. He has a Ph.D. from the London University. He specializes in international tax issues, with a particular interest in double tax conventions, EU tax law, and taxation and human rights (especially the European Convention on Human Rights). He has appeared in a significant number of cases before courts and tribunals at the highest level, including the European Court of Justice.



**Mukesh Butani** is a Founder Member of ITRAF and the Managing Partner of BMR Legal. He is a Chartered Accountant, has a law degree and practices as an advocate in various Tribunals, High Courts and The Supreme Court of India. He is President, International Fiscal Association (IFA), India. He represents the International Chamber of Commerce (ICC), Paris, on the MoF Standing Committee on TDS and Foreign Tax Credit. He has served as member, Expert Task Force on International Tax and Transfer Pricing, MoF, in July 2012. He was member of the Tax Bureau of OECD – BIAC, Permanent Scientific Committee of IFA and is presently Vice Chairman of Taxation Commission of ICC. He was member of the Focus Group on Administrative Practices on tax disputes at the Tax Administration Reform Commission (TARC) set up in August 2013 by the MoF.



**Hitesh D. Gajaria** is a Board Member of ITRAF and Senior Partner with the tax practice at KPMG India with more than three decades of tax, transfer pricing and regulatory consulting experience. Prior to his role as the Senior Partner, Hitesh led the Industrial and Consumer Manufacturing Sector Corporate Tax practice, and has also co-led KPMG in India's Transfer Pricing practice. He has co-authored BCAS' publications - 'Taxation of Non-Residents, FERA / FEMA' and 'Transfer Pricing Manual' and was Country Reporter for India at IFA international conference. He is also a mentor at KPMG in India's, Enactus initiative, guiding college students in developing socially sustainable community projects. He is a Fellow Member of ICAI.



**K. R. Girish** is a Founder Member and Director on the Board of ITRAF. Previously he was a Senior Tax Partner and National Head of Tax Litigation and Disputes resolution practice in KPMG. After 20 years, he took an entrepreneurial step and set up his own practice under K R Girish & Associates, specialising in direct tax and regulatory issues. He was a president of the Bangalore Chamber of Industry and Commerce (2009-10) and continues to be Chairperson of the Finance Committee of the Chamber. He is fellow member of ICAI and an Associate member of the Australian Taxation Institute. He is a regular faculty member of ICAI Diploma in International Tax programme. He has Law degree from the Karnataka State Law University.



**Karnik Gulati** is a Chartered Accountant from India. He also holds Baccalaureate in Law (LL.B.) and Advanced Diploma in International Taxation from Chartered Institute of Taxation (CIOT), London. His areas of expertise include advising clients on international taxation, corporate taxation, transfer pricing, foreign exchange regulations matters and start-up consulting. He is currently associated with Coinmen Consultants LLP in New Delhi, India. He has also worked with consulting firms of international repute including KPMG (New Delhi), Deloitte (New Delhi) and T.P. Ostwal & Associates (Mumbai) in the past. He has authored numerous articles, research papers and case studies on international taxation and transfer pricing. He is also a core committee member of the International Taxation Committee of the Bombay Chartered Accountants' Society, Mumbai. He has been awarded with 'Certificate of Fellowship' by Professor Roy Rohatgi and Adv. Mukesh Butani, on behalf of Foundation for International Taxation, Mumbai, for the year 2015 and 2019 respectively.



**Johann Hattingh** is Professor in the Faculty of Law of the University of Cape Town, South Africa. He is an Advocate of the High Court of South Africa and formerly practised with PwC. Prof Hattingh was educated at the Universities of Cambridge, Leiden, Cape Town and Stellenbosch. He is the Chief Editor of IBFD's Bulletin for International Taxation and part of the management structure for the IBFD Centre for Studies in African Taxation. Outside of academia he has acted as senior international consultant for the UN Economic Commission for Africa, the IMF and for NEPAD on behalf of the African Union. He serves as Rapporteur for Africa in the International Law Association's Study Group on International Taxation and is executive board member of the International Fiscal Association-South Africa.



**H. Padamchand Khincha** is a Founder Member and Director on the Board of ITRAF. He is a partner in H C Khincha & Associates, Bangalore. He advises on tax structuring, due diligence, transfer pricing and compliance aspects. He has represented large corporates in high-profile cases before Income-tax tribunals and is associated with landmark decisions. He has deposed before several high-level government committees. He has many books and articles to his credit. He lectures on income tax issues, including at IIM, Bangalore, ICAI, and Direct Taxes Training Institute of the Income Tax Department. He is a 1982 Chartered Accountant securing 25<sup>th</sup> rank. He is a member of ICAI's Committee for preparing a paper on Income Computation and Disclosure Standards.



**S. Krishnan** is an international tax professional with significant on-ground experience of globalizing a company's operations. He is a founder member of ITRAF. He is an Associate Member of ICAI and Institute of Cost Accountants of India. His book, *Investing in Indian & Foreign Start-up Companies* provides an overview of income tax consequences and forex requirements for start-ups. He advises companies on international tax structuring and performs the role of a virtual international tax manager providing 'tax health check-up' and compliance oversight of international tax, employee mobility and transaction taxes. He provides advisory services to U.S. citizens and green card holders on tax compliance, reporting obligations and estate planning. Earlier, he was Vice President and Group Head – International Taxation at Infosys Limited, Bengaluru.



**Yvette Lind** is currently an assistant professor in tax law at Copenhagen Business School, Denmark. Swedish jur.dr. specializing in international taxation with an emphasis on challenges arising from globalization, increased taxpayer movement and the fragmentation of law. Awarded Swedish TOR/Skattenytt post-doc between 2017-2019 in connection to defending her doctoral thesis. Regular guest researcher and teacher at the Faculty of Law, Lund University and the Max Planck Institute for tax law and public finance in Munich.



**Hans Mooij** is an independent tax counsel specializing in international tax compliance and controversy. He assists corporate clients as well governments. As tax treaty consultant he has worked for various international organizations including OECD, United Nations, and IMF. He is a Visiting Professor at the International Tax Centre (ITC) Leiden, and at the University of Amsterdam School of Law. He served the Netherlands Government as tax treaty negotiator, as Competent Authority in tax treaty matters, as prime litigator in tax treaty and EU law cases before the Dutch Supreme Court and the Court of Justice of the European Union, and as delegate to the OECD Working Party No 1 on the Model Tax Convention and member of its Steering Group. He chairs the TRIBUTE organization, an independent, global initiative of leading experts in international taxation, which seeks to spread awareness of tax arbitration and tax mediation among the global tax community and avails experts for appointment as arbitrator, mediator or technical advisor in disputes on tax treaty or cross-border tax issues.



**Dr Nigam Nuggehalli** is a Board Member of ITRAF and Registrar, National Law School of India University, Bangalore. He is also a Visiting Professor and Advisor to the School of Law at BML Munjal University, Gurugram. He was previously the founding Dean of the School of law at BML Munjal University. Previously, he was a Visiting Professor at the National Law School, Bangalore and an Associate Professor at Azim Premji University, Bangalore. He holds a DPhil in Law from Oxford University and an LLM (Taxation) from New York University School of Law. Prof. Nuggehalli also taught at BPP University, London, United Kingdom, for several years, where he led a team of academics in delivering undergraduate programmes in jurisprudence and post graduate programmes in commercial law and international tax law. Prior to joining academia, Prof. Nuggehalli was an international tax lawyer working in New York, USA. Prof. Nuggehalli is presently completing a monograph on international taxation from an Indian perspective.



**T. V. Mohandas Pai** is a Founder Member and Director on the Board of ITRAF. He is Chairman of Aarin Capital, and Chairman of Manipal Global Education Services (MaGE). Previously, he served as a Member of the Board and Chief Financial Officer (CFO) at Infosys. He was voted 'CFO of the Year' multiple times and spearheaded the first listing of an India-registered company on NASDAQ. He was awarded the Padma Shri in 2015 and the Karnataka Rajyotsava Award in 2004. He is a Fellow Member of ICAI.



**Dr Leandro M. Passarella** is a founder partner and the tax practice leader of Passarella Abogados, a boutique Argentine tax law firm, where he focuses his practice on advice for inbound and outbound investments. He is also the professor of Personal Income Taxation at the Masters programs in Tax Law of Universidad Torcuato Di Tella (Buenos Aires, Argentina), where he also coordinates UTDT Global Tax Talks, a platform fostering an interdisciplinary dialogue among faculty members, global tax policymakers and practitioners on hard tax topics of international taxation. He holds a JD degree (with honors) from Universidad de Buenos Aires, as well as the LL.M. degree from Harvard Law School, jointly obtained with the Harvard International Tax Program certificate. He has contributed with chapters for several books, the latest being the Argentine chapter for “Taxation of Crypto Assets” (Wolters Kluwer, 2020).



**P.V.S.S. Prasad** is a practising Chartered Accountant and partner in Prasad & Prasad, Chartered Accountants, Hyderabad. He is the past Chairman of Hyderabad Branch of ICAI and past President of The A.P. Tax Bar Association. He co-authored a book “International Taxation - A Basic Study”. He was Chairman of All India Federation of Tax Practitioners (AIFTP), South Zone for the term 2010-2011. He was invited to speak at IFA Asia / Africa Conference held in Mauritius in May 2012, May 2014 and May 2016 & IFA Asia-Pacific Regional Tax Conference 2016 held in Seoul, South Korea in May 2016. He is elected Vice Chairman of IFA India Branch 2018-20.



**Dr Rohit Roy** is Assistant Professor of Law at Christ (Deemed to be University), Bengaluru. He has a Ph.D. in International Environmental and Trade Law and Policy and a Masters in International Commercial Law, both from Cardiff University, UK. His current research interests are in the field of climate change and the regulation of displaced persons, as well as in various aspects of international taxation. His areas of teaching comprise environmental law (domestic and international), international taxation and food security policy. Prior to teaching, he worked as a Tax Research Consultant at ITRAF, Bengaluru.



**Indraneel Roy Choudhury** is a Founder Member and Director on the Board of ITRAF. He is based in PwC Bangalore, and is a Tax Partner and a former Leader of South India Tax & PwC’s Tax Leadership Team. He currently chairs the Tax Policy Panel for PwC Tax function. He specializes in International Tax & Transfer Pricing. He has nearly 30 years of experience in advising domestic and multinational clients on tax, legal and regulatory issues, on inbound / outbound transactions, tax structuring, mergers & acquisitions and transfer pricing planning, and compliance issues, MAPs and APAs. He has been associated with several professional & trade bodies and has lectured at various fora including PwC’s Leadership Development programs at Genesis Park. He is a Fellow Member of the Institute of Chartered Accountants of India (ICAI).



**K. R. Sekar** is a Founder Member and Director on the Board of ITRAF. He is a Tax Partner with Deloitte and leads Deloitte Private for Deloitte India. Sekar is the President of Bangalore Chamber of Industry & Commerce (BCIC), is a Member of the India Board of International Fiscal Association and also works closely with other chambers including NASSCOM. He has more than 30 years of experience in the field of direct taxes, mergers and acquisitions, international taxation and transfer pricing. His client portfolio includes leading companies in technology, media, telecommunications, manufacturing and engineering. Sekar's key areas of expertise include inbound structuring, litigation support and advising on cross border tax issues. He advises inbound global companies coming into India on entry strategy, inbound structuring and assists them on mitigating tax risks. He is also associated with many landmark litigation cases for global companies. He was recognized as one of the leading tax controversy leaders by *International Tax Review*, UK.



**Suresh Senapaty** is a Board Member and Head of Finance Committee, ITRAF. He is a Member of the Board of Directors of Wipro Enterprises Pvt. Ltd. Suresh was Executive Director and Chief Financial Officer (CFO) of Wipro Limited till his superannuation in March 2015. He is a member of SEBI's Committee on Disclosures & Accounting Standards (SCODA) and the National Advisory Committee on Accounting Standards. He was awarded "CFO of the Year" by IMA in association with American Express in 2002, Best CFO for IT /ITES sector by CNBC-TV 18 in 2003, and CFO Wall of Fame by 9dot9 Mediaworx in 2006. He is a frequent speaker at industry forums and writes regularly on economic & finance matters.



**Dr. Parthasarathi Shome** is Chairman, ITRAF, Bengaluru, and Senior Visiting Fellow, London School of Economics. Earlier, he was Adviser (Minister of State) to the Indian Finance Minister, and chaired the Tax Administration Reform Commission (TARC). Before that, he was Chief Economist, UK Revenue and Customs; Chief of Tax Policy, IMF; and Professor, American University, Washington DC. He chaired India's Ninth and Tenth Five Year Plan Task Forces on tax policy and administration. He received Brazil's highest civilian honour, *Commander of the Order of the Southern Cross*, for his contributions to Brazilian fiscal reform, and the Jeanne S. Mattersdorf Award of the National Tax Association of America as "an outstanding student in the field of taxation and public finance" for his Ph.D. thesis on the incidence of the corporation income tax. He is widely published and is invited to speak across the globe.



**P. V. Srinivasan** is a Chartered Accountant and a Member of the Institute of Chartered Accountants of India, New Delhi. He is engaged as a corporate advisor on global taxation and corporate law matters. His experience is in manufacturing and information technology industries with regard to corporate tax compliances across tax jurisdictions. He headed the Corporate Tax function at Wipro, Bangalore. He was a member of Emerging Issues Task Force on non-resident of Ministry of Finance, and the working group on transfer pricing. He is the Chairman of the Indirect Taxation Committee of Bangalore Chamber of Commerce and Industry (BCIC). He has been a visiting faculty at Training Institute of Income Tax Department, ICAI, and Institute of Company Secretaries of India.





**Suranjali Tandon** is an Assistant Professor at the National Institute of Public Finance and Policy (NIPFP). She is Chevening financial services fellow 2019 at King's College London. She leads NIPFP's work on international and corporate tax and has published several papers on the subject. She is a special invitee to the sub-group on Finance and Regulation, Task Force for Sustainable Finance, Ministry of Finance, Government of India. She completed her PhD from Jawaharlal University, New Delhi.



**Krupa Venkatesh** is an indirect tax professional with 30 years of experience. She is a Cost Accountant and Company Secretary by qualification. Her work experience comprises 10 years with Government of India, 14 years with Deloitte and 3 years at Amazon India. She is a frequent speaker, recognised by the International Tax Review as one of India's leading indirect tax professionals successively during her stint at Deloitte and has been on various Committees of trade associations, notable of them being a Special Invitee to the FICCI Indirect Tax Committee on GST. She is currently a Partner with Consark, a boutique financial advisory services firm.



**Aditya Vora** is an Advocate with the Chambers of Porus Kaka. He studied law at Jindal Global Law School before obtaining an LLM from the LSE. His professional and academic engagements are focused on international taxation. Professionally, he has advised and represented various multinationals on tax treaty issues. Academically, his interests lie in dispute resolution, particularly international tax arbitration on which he has spoken at conferences and written in reputed journals.



## D. Objectives and Activities

**ITRAF** ([www.itraf.org](http://www.itraf.org)) is a forum for tax policy research and analysis focussed on international tax matters. Founded in 2015, it holds round tables, seminars and conferences, and publishes research volumes.

### A

ITRAF undertakes extensive economic and legal studies on the tax structure, its rules and regulations. It has, among other aspects, examined:

- The state of India's tax policy structure.
- Technology change and changing business models.
- Enhancing global competitiveness in the environment of Base Erosion and Profit Shifting (BEPS).
- Taxation matters such as GAAR, POEM, taxpayer rights and charters, and charitable organisations.
- Emerging issues in digital economy taxation.
- Tax administration and governance in litigation, arbitration, faceless assessment, and others.
- Implementation of emerging and progressive tax regimes including the Goods and Services Tax.

### B

ITRAF has published five volumes on international taxation challenges. ITRAF Members and external researchers—professionals comprising accountants, economists, lawyers, academicians—have contributed to its volumes. The volumes, listed in the website [www.itraf.org](http://www.itraf.org), are:

1. *Insights into Evolving Issues of Taxation: Existing and Continuing Challenges*, Wolters Kluwer, Gurugram, 2016.
2. *Base Erosion and Profit Shifting (BEPS): The Global Taxation Agenda*, Wolters Kluwer, Gurugram, 2016.
3. *Challenges in Domestic and International Taxation: Emerging Indian Experience*, with a Foreword by Philip Baker, QC, OakBridge Publishers, Gurugram, and TaxSutra, Pune, 2018.
4. *International Taxation in the Digital Era*, with a Foreword by Professor Judith Freedman, Oxford University, OakBridge Publishers, Gurugram, 2020.
5. *Reimagining International Taxation*, with a Foreword by Leandro M. Passarella and María Celina Valls, OakBridge Publishers, Gurugram, 2021.

In addition, three ITRAF Members have published books on the Angel Tax, Tax Consolidation, Digital Economy & Direct Taxation and Capital Taxation.

A critical mass of researchers and authors are making ITRAF's research efforts successful and are supportive in its efforts to convey the findings widely across the profession.

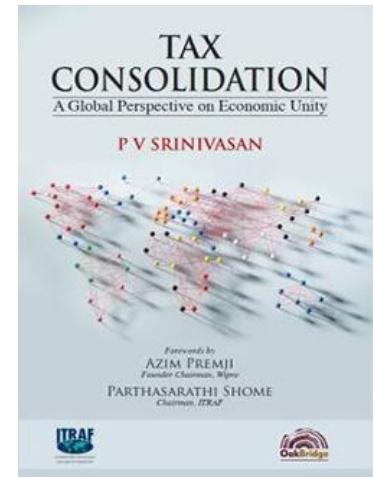
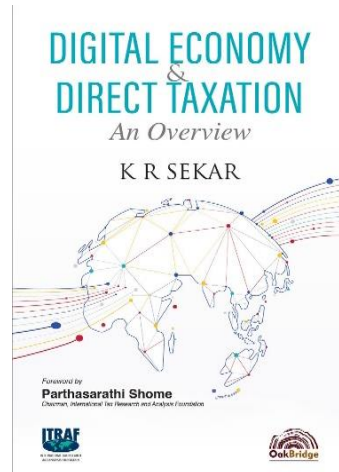
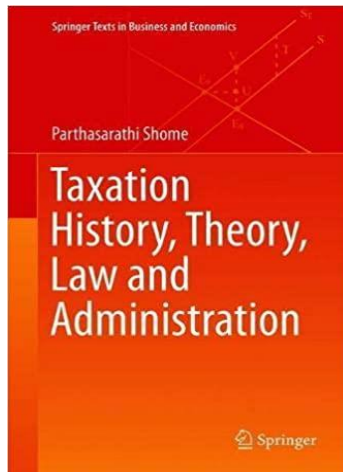
### C

ITRAF has engaged with international entities to hold conferences and dialogues. It held a one-day conference with the Forum for Economic and Fiscal Policy (FEFP), The Hague, on 26 October, 2018. It organised a complete panel of tax experts at a conference of the Chartered Institute of Taxation's (CIOT) Advanced Diploma of International Taxation (ADIT), London, on 13 September, 2019. It held a conference at Department of Law, Tax Programme, London School of Economics, at the launching of its fourth volume, on 13 March, 2020. The Chairman makes particular efforts to make ITRAF globally recognisable with international participation in its research and conferencing activities.

## D

The Chairman of ITRAF is Parthasarathi Shome. Members of the Governing Body are: T. V. Mohandas Pai, Suresh Senapaty, K. R. Sekar, Indraneel Roy Chaudhury, K. R. Girish, H. Padamchand Khincha, P. V. Srinivasan, Mukesh Butani, Nigam Nuggehalli, Hitesh Gajaria and S. Krishnan. Selected Members comprise ITRAF's research and finance committees. Rohitash Chaudhary is Research Associate.

## E. Books by ITRAF Scholars



## F. ITRAF Volumes

