



INTERNATIONAL TAX RESEARCH
AND ANALYSIS FOUNDATION




ITRAF Seventh Annual Conference
Friday, 30 June, 2023, 9.30 a.m. IST

**I. New Range in Taxation:
Robots, Carbon Emissions, Checkpoint Tax, Fraud, Experts**

Sl. No.	Title of Paper	Speaker/Author	Session (p. m. IST)
30 June 2023, 9:30 a.m. - 6:00 p. m. Indian Standard Time (IST)			
1	Opening the Conference Introduction	Dr. Parthasarathi Shome Chairman ITRAF	09.30 – 09.40
2	Taxation of Artificial Intelligence / Robots as It Knocks	Parthasarathi Shome	9.40 – 10.00
	Chair	K. R. Sekar Founder Member ITRAF Partner Deloitte	10.00 - 10.10
3	Taxing Carbon Emissions for Green Transition	Dr. Suranjali Tandon Assistant Professor, National Institute of Public Finance and Policy (NIPFP) India	10.10 - 10.30
	Chair	Parthasarathi Shome	10.30 – 10:40
4	Checking in on Tax: The Evolution of Checkpoint Taxation in Afghanistan	Dr. Lyla Latif Chief Executive Lai Latif & Co Nairobi, Kenya	10:40 - 11.00
	Chair	Yvette Lind	11.00 - 11.10
5	Tax and Technology - From Compliance to Fraud Detection in VAT/GST	Krupa Venkatesh Mentor, Consark Advisory Services LLP, India	11.10 - 11.30
6	GST's OIDAR	Shankey Agarwal BMR, and Harsh Shukla, BMR, Shinjini Agnihotri, BMR	11.30 – 11.45
	Chair for 5 and 6	P V Srinivasan Member ITRAF Corporate Advisor, PVS Advisors, India	11.45 – 12.00
7	The Problem of Expertise - The Practice of Offering Mobile Workers Preferential Expert Tax Regime - A Swedish Perspective	Dr. Yvette Lind Professor, Department of Law and Governance, BI Tax and Fiscal Policy Centre Oslo, Norway	12.00 - 12.20
	Chair	Dr. Nigam Nuggehalli	12.20 – 12.30
	Lunch break		12.30 – 1.00 p.m.

II. Orthodox Concerns: Avoidance, Treaties, Transparency, Ethics, PPT, Pillars I and II			
8	Tax Avoidance in Indian Tax Treaties: Past, Present and Future	Dr. Nigam Nuggehalli Member ITRAF Professor and Registrar, National Law School of India University (NLSIU), India	1.00 – 1.20
	Chair	H. Padam Chand Khincha Founder Member ITRAF Partner HC Khincha & Associates	1.20 – 1.35
9	Tax Transparency and Governance: International Experience	Saurav Bhattacharya, Associate Partner, PwC LLP and Indraneel Roy Chaudhury Founder Member, ITRAF Partner PwC (Retd.)	1.35 – 2.05
	Chair	PVSS Prasad Partner, Prasad & Prasad CA, India	2:05 – 2.20
10	Ethics of Tax Planning	Mukesh Butani Managing Partner BMR Seema Kejriwal, BMR and Aditya Rathore, BMR	2.20 – 2.40
	Chair	K R Girish	2.40 – 2.55
11	Principal Purpose Test (PPT) in Domestic Law versus Tax Treaties in International Context	K. R. Girish Founder Member, ITRAF K. R. Girish Associates, India	2.55 – 3.15
	Chair	Mukesh Butani	3.10 - 3.25
12	The Effect of OECD Pillar Two on Tax Incentives in Developing Countries: An Indian Perspective	Dr. Rohit Roy Associate Professor, O. P Jindal Global Law School, India Amrisha Tripathi	3.25 – 3.45
13	Implementation of Pillar Two Rules - Tax Treaty Challenges and Possible Contradictions	Aditya Vora Advocate, India LLM Tax Law, London School of Economics	
	Chair for 12 and 13	Indraneel Roy Chaudhury	3.45 – 4.05
III. The Globalising World			
14	Valedictory Lecture: National Tax Systems in a Globalized and Globalizing World	Dr. Vito Tanzi Director, Fiscal Affairs Dept. IMF (Retd.)	4.05 – 4.35
	Chair	Parthasarathi Shome	4.35 – 4.45
15	Rapporteur: Summing Up the Day Open Panel Discussion ---- State of Indian Taxation	K.R.Girish K. R. Sekar	5.45– 5.15 p.m. 5:15—6:00 p.m.

Author Profiles (In the order of presentations)

	<p>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, <i>Commander of the Order of the Southern Cross</i>, 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>
	<p>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 Past 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 <i>International Tax Review</i>, UK.</p>
	<p>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.</p>



Lyla Latif : As the Chief Executive of Lai'Latif & Co Advocates, Lyla Latif has led the firm to become a prominent player in multiple areas of tax and law, including establishing a philanthropy wing to support underprivileged women from low-income households with zakat. Lyla is also a board member of Tax Justice Network and the International Lawyers Project, and a member of the inaugural Tax Law Committee of the East Africa Law Society, where she informs and shapes East Africa's tax doctrine and practice.

She is also an expert trainer with Capabuild, Rotterdam's premier tax capacity building organization, focusing on training revenue authorities in Botswana and Indonesia and the Tax Appeals Tribunal of Kenya on emerging international tax norms and rules. She is a Chair and co-founder of the Committee on Fiscal Studies, dedicated to the reform and strengthening of tax systems in the global south, generating research needed for knowledge transfer, policy advocacy, capacity building, and tax trainings.

Lyla has worked with governments, law firms, NGOs, think tanks, and universities in Africa, Germany, Israel, the UK, and the USA. She is an author and co-author of numerous publications in peer-reviewed international journals, policy briefs, working papers, reports, and tax training manuals. She has advised the Future Generations Commissioner for Wales, UNCTAD, UNDP, UN Office of the Special Adviser on Africa, European Commission's Directorate for Research and Innovation, WHO, the Kenyan and German Parliaments, as well as several NGOs.



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 Mentor with Consark, a boutique financial advisory services firm.



Shankey Agrawal is a Partner at BMR Legal who specialises in tax litigation and has been involved in several high-stake litigations, with over 14 years of robust experience in both direct and indirect tax litigation. Shankey is also qualified as an Advocate on Record of the Supreme Court and is also a qualified Company Secretary from the Institute of Company Secretaries of India (ICSI)



Harsh Shukla is a Managing Associate at BMR Legal. He has an extensive experience of 9 years in indirect tax and trade law. He has advised several corporates on various facets of indirect tax law and has successfully represented clients before High Courts, CESTAT and revenue authorities. Harsh is also a qualified Chartered Accountant and is a regular contributor in various reputable journals on issues of tax and trade law.



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.



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.



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.



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 25th rank. He is a member of ICAI's Committee for preparing a paper on Income Computation and Disclosure Standards.



Saurav Bhattacharya is a Chartered Accountant and Certified Public Accountant (CPA) with over 30 years of experience in corporate taxation and accounting. He has worked extensively in tax compliance, tax litigation and rendered advisory services in taxation of transactions, mergers and acquisitions, corporate restructuring and international taxation. In his current role as Associate Partner at Price Waterhouse & Co. LLP India, he is a member of the Corporate and International Tax Centre of Excellence, the role of which is to provide viewpoints on involved questions of corporate and international taxation, M&A, expatriate taxation, GAAR and other aspects. As secretary to the Tax Policy Panel of the organisation he also contributes to deliberation and assessment of tax policy and reputational aspects of tax practice. He has contributed to international tax publications, such as IBFD Tax Bulletin and was India country reporter in the IFA Congress of Boston in 2012



Indraneel Roy Choudhury is a Founder Member and Director on the Board of ITRAF. He recently retired after a long career from PW & Co Llp, Bangalore, as Tax Partner and former Leader of South India Tax & PW & Co Llp's Tax Leadership Team. He chaired the Tax Policy Panel for PW & Co Llp Tax function. He specializes in International Tax & Transfer Pricing. His experience is 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).



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 the Vice Chairman of IFA India Branch 2021-23.



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.



Seema Kejriwal is a Partner at BMR Legal who specialises in international corporate tax and transfer pricing with two decades of experience in advising Fortune 500 multinationals and large Indian business houses. She has co-authored several contributions in transfer pricing compendiums and books by leading organisations and authors, such as Vienna University's publication on Transfer Pricing Developments Around the World, Chamber of Tax Consultants, Bombay Chartered Accountants' Society



Aditya Rathore is an Associate with the international tax and transfer pricing team at BMR Legal. In his current role, he is involved with the firm's litigation, advisory and policy work, relating to Transfer Pricing, International Tax and Direct Tax. He has also appeared before several High Courts and Income Tax Appellate Tribunals. Aditya is a National Law University (NLU) Odisha graduate and is also pursuing ADIT from CIOT, UK.



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.



Dr Rohit Roy is Associate Professor of O P Jindal Global Law School, Delhi. 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.



Amrisha Tripathi has an LL.M. in International and Comparative Public Law from the West Bengal National University of Juridical Sciences, Kolkata. She has been a legal researcher and academic for 8 years now. She has taught at some of the leading law schools in India which include the Tamil Nadu National Law University, Trichy and School of Law, CHRIST (Deemed to be University), Bengaluru. Her research interests include policy and governance, international human rights and humanitarian law, and feminist legal studies.



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.



Vito Tanzi was born and raised in Italy and is a citizen of both Italy and the USA. He is married, has three sons, and resides in Bethesda, Md., USA. He received degrees in economics, from Harvard University, (MA, 1963, and PhD, 1967), and from George Washington University, (BA, 1959 with “special honors in economics”, and another MA in economics in 1961). In 1959-1961 he worked for the Joint Economic Committee of the US Congress, and for a Presidential-Congressional Commission (Outdoor Recreation Resources Review Commission, ORRRC). In 1963-1965, while working on his PHD dissertation, he was associated with a research program at George Washington University, which was studying the potential economic benefits from R&D’s spending by NASA, and taught economics. In 1965-67 he was a senior economist in the Joint Tax Program of the Organization of American States (OAS) in Washington. In 1967-75 he was Professor of Economics (Department Chair, 1970-73, and on leave in 1974), at the American University in Washington DC. He taught graduate courses in Public Finance and in Income Theory. Over the years, he has been a visitor in various foreign universities, including twice at the university of Munich (Germany), the Bocconi University in Milan, the University of Torino (Italy), the University of Rome and some others. In 1975 he joined the IMF, as Head of the Tax Policy Division and in 1981 he became Director of the Fund’s Fiscal Affairs Department, a position that he held until the end of 2000. In that position, he supervised hundreds of economists, many with PhDs in economics from top universities, directed the IMF work in the fiscal area, and advised the governments of many countries on fiscal issues and on tax reforms. After leaving the IMF, he served in the Italian Government, at ministerial level, as Undersecretary for Economy and Finance. After leaving the Italian Government, in July 2003, he spent some years as a visiting scholar at the Inter -American Development Bank in Washington DC. In recent years, he dedicated himself mainly to research, writing, and speaking at international conferences.



INTERNATIONAL TAX RESEARCH
AND ANALYSIS FOUNDATION

A. Objectives and Activities

ITRAF (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 six 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, 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.
6. *Prevailing and Emerging Dilemmas in International Taxation*, with Foreword by Mr. Vito Tanzi, OakBridge Publishers, Gurugram, 2022.

In addition, three ITRAF Members have published books on the Taxation, History, Theory, Law and Administration (P Shome) Tax Consolidation, (P V. Srinivasan) Digital Economy & Direct Taxation (K R Sekar) and M, Tax Payer's Rights (Mukesh Butani & Khinshuk Jha)

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.

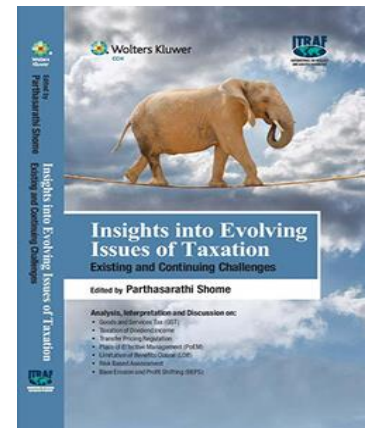
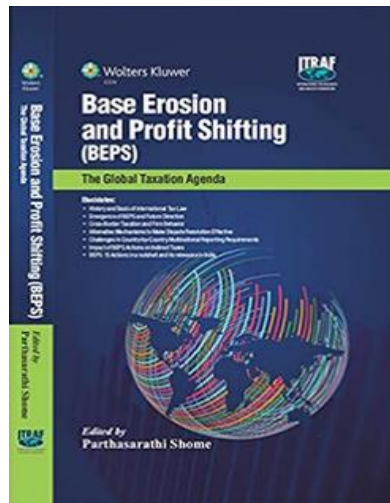
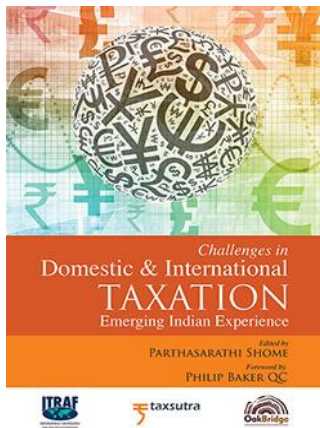
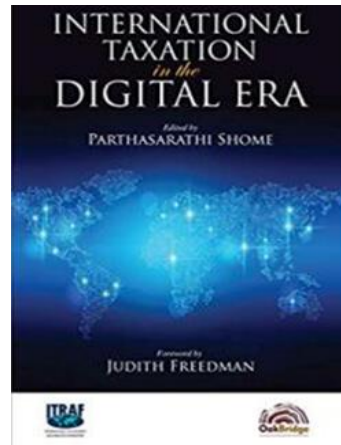
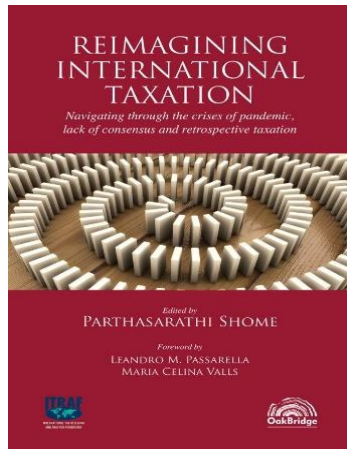
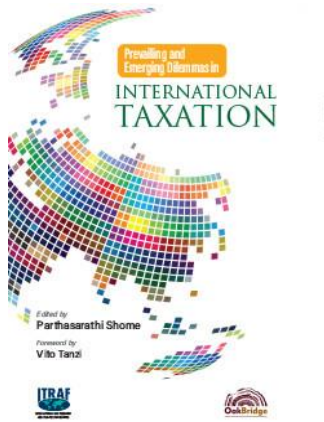
C

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..

ITRAF Volumes



Books by Individual ITRAF Scholars

