13th Annual

Asia Pacific Cross Border Transactions

18th & 19th February 2008

Mumbai, India

Back by Popular Demand

Avail Corporation is proud to bring to Mumbai it's 13th Annual Cross Border Transactions conference. This event is designed for Senior Finance Excutives who are looking to get the latest updates for Transfer Pricing in the region and learn the latest strategies from the experts in the region.

Make sure you're part of it – and book your place before it's too late!

Hear from these Leading Practitioners

- **Mukesh Butani**, Partner, BMR AND CO
- **Dr Shanto Ghosh**, Director and Economist Principal, DELOITTE HASKINS & SELLS
- **S.P. Singh**, Senior Director, DELOITTE TOUCHE TOHMATSU INDIA
- **T. P. Ostwal**, Partner, T.P. OSTWAL & ASSOCIATES, MUMBAI INDIA
- **Sanjay Tolia**, Head of Transfer Pricing, PRICEWATERHOUSECOOPERS, INDIA
- **Shyamal Mukherjee**, Partner, Transfer Pricing, PRICEWATERHOUSECOOPERS, INDIA
- **P.V. Srinivasan**, Vice President (Corporate Taxation), WIPRO

Including country updates by **Senior Government Officials** from China, India, Korea and Malaysia!

Media Partner

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Conference + Masterclass Workshops

Join us and take away with you, a roadmap for action and practical steps for your company to move confidently forward with well established transfer pricing plan

Effective Approaches to Preparing Transfer Pricing Documentation

To prepare for transfer pricing, every organisation needs to establish a strategy that incorporates global transfer pricing risk assessment and prerapation of documentation. This workshop will set the ground work for creating a focused and effective approach to documentation.

Lead by:
Sanjay Tolia
Head of Transfer Pricing,
PRICEWATERHOUSECOOPERS, INDIA

Managing Your Transfer Pricing Tax Risk

This workshop will help you identify the appropriate transfer pricing methods and opportunities to lower the effective corporate tax rate through transfer pricing. Mitigate the potential transfer pitfalls. Analyze and evaluate the potential tax exposure.

Lead by:
Mukesh Butani
Partner
BMR AND CO

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Past Participants Include:

ABN AMRO
ADITYA BIRLA GROUP
AIR LIQUIDE ENGINEERING INDIA
AMERADA HESS
AMWAY
AVERY DENNISON
BBRAUN
BAXTER HEALTHCARE
BAYER
BECHTEL
BMW
CATERPILLAR
CISCO SECURITY
CONOCOPHILLIPS
DAIMLER CHRYSLER
DBS BANK
DEGUSSA CONSTRUCTION CHEMICALS
DELL
EMC
EMERSON NETWORK POWER
ERICSSON
FLEXTRONICS MANUFACTURING
HEINZ
HONEYWELL INTERNATIONAL
HUAWEI TECHNOLOGIES
JOHNSON AND JOHNSON
JOHNSON CONTROLS
KEPPEL LAND
KRAFT FOODS ASIA PACIFIC SERVICES
LENOVO
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OTIS ELEVATOR
PFIZER PHARMACEUTICAL
QANTAS
RENESAS SYSTEM SOLUTIONS ASIA
RIO TINTO
ROBERT BOSCH
SAMSUNG ELECTRONICS
SCHWARZ PHARMA
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SCHNEIDER ELECTRIC
SEAGATE TECHNOLOGY
SHELL EASTERN PETROLEUM
SIEMENS
STIEFEL LABORATORIES
SUMITOMO ELECTRIC INTERCONNECT
TETRA PAK
VERIZON

What's In Store

It's happened. India has been deemed to be the thriving 'Giant' of Asia. Increasing participation of international cross border activities of companies in India has given rise to new and complex issues. Stepping into the new outlook of tax regimes, transfer pricing is one of such prominent high risk area that needs to be effectively addressed.

How well is your company equipped with the latest and stricter transfer pricing regulations? Are you ready for the intense audit and inspection from the regulatory bodies? To gain a foothold in the market, it is necessary for corporations in India to focus on transfer pricing policies and strategies or they will risk not doing so at your own peril.

The challenge is facing the vital issues of transfer pricing on all sides and still maintaining the keen competitive edge. Race ahead from the rest and join us for the 13th Asia Pacific Cross Border Transactions conference! Embrace your tax planning and compute reasonable, fair and equitable profits in the long run!

Who Should Attend

This event has been thoroughly researched for:

- Chief Financial Officers
- Financial Controllers
- Finance Directors
- Finance Managers
- Corporate Tax Managers
- Heads of Tax
- Tax Directors
- Tax Managers
- Tax Counsels
- Tax Analysts
- Accountants
- Accounting Managers
- Financial Managers
- Treasurers
- Auditors
- Company Secretaries
- Lawyers / Solitcitors
- General Managers, Managing Directors, CEOs

From
Multinationals and Joint-Ventures with offices in India/ Asia Pacific; including local companies that are looking to set up another office in India/ Asia Pacific.

Sponsorship, Exhibition & Marketing Opportunities

Avail Corporation specializes in business intelligence through our cutting-edge business strategy events. We provide major organizations with the platform to enhance your profile and give you access to the right target audience. For further information on sponsorship and marketing opportunities, please contact **Geraldine Chew** at:
T. +65 6324 9733 E. gchew@availcorp.com

Message From the Producer

The producer would like to express her most sincere appreciation to the many who have taken the time and effort in sharing with her the valuable insights during her research and preparation for the conference. Special thanks have been accorded, of course, to our eminent panel of speakers and advisors. If you are an expert in your field and would like to speak/join in the panel discussion at this and/or future Avail Corporation events, please contact **Li Ling Chor** at:
T. +65 6324 9737 E. lchor@availcorp.com

Book by 11 January 2008 and SAVE $200

13th Annual
Asia Pacific Cross Border Transactions
18th February 2008 I Programme Day 1

0830 Registration

0850 Opening Address from Chairperson

Dr Shanto Ghosh, Director and Economist Principal, DELOITTE HASKINS & SELLS

OVERVIEW

0900 **The Global Transfer Pricing Landscape: Recent Developments**

- Status of transfer pricing regulation across the region
- Emerging Trends and Implications

Dr Shanto Ghosh, Director and Economist Principal, DELOITTE HASKINS & SELLS

ASIAN COUNTRIES LIVE EXAMPLES

0945 **Transfer Pricing in India**

- Summary review of transfer pricing in India
- Importance of tax treaties
- Brief review of reporting requirements
- Current status of transfer pricing litigation in India

Director General, CBDT India

1030 Morning Coffee and Networking Break

1100 **Updates in Transfer Pricing Regulations in Korea**

Anh Sae Joo, International Tax Director, MINISTRY OF FINANCE AND ECONOMY REPUBLIC OF KOREA

1145 **Transfer Pricing Development and Practical Guidelines in Malaysia**

- Introduction to transfer pricing development in Malaysia
- Implementing a successful transfer pricing infrastructure in an MNC
- Overcoming pitfalls with compliance when procedure is unclear

Senior Representative, INTERNAL REVENUE BOARD, Malaysia

1230 Lunch & Networking Break

1400 **Transfer Pricing Regulations in China**

- Introduction to transfer pricing regulations (TPR) in China
- Implementing a successful transfer pricing infrastructure in an MNC
- Overcoming the challenges with compliance when procedure is unclear
- Adopting local practices and practise due-diligence to stay competitive
- Revenue transfer pricing audits: risk factors

Su XiaoLu, Assistant Inspector, INTERNATIONAL TAX DEPARTMENT OF NATIONAL TAXATION BUREAU, Former Director of Anti – Avoidance of Taxation, STATE ADMINISTRATION OF TAXATION CHINA

1445 **Case Study**
Practical Strategies for Outsourcing Industry in India

- BPO Trends in India
- Identifying the pitfalls associated with outsourcing
- Reevaluating your transfer pricing approach

Shikha Gupta, VP Transfer Pricing, GE India

1530 Afternoon Coffee and Networking Break

1600 **Case Study**
Transfer Pricing in IT industry
With the rapid development of Information Technology (IT) in India, great surge in the amount of inbound and outbound activities has been sighted in the industry in recent years. Transfer pricing becomes a key issue here as IT goods and services are being exchanged internationally. What are the kinds of pitfalls that corporations should look out for? How should corporations use the applicable standards of transfer pricing to gain a hedge over the rest? What other vital transfer pricing issues are there in the IT industry?

V. Balakrishnan, CFO, INFOSYS TECH

1645 **Transfer Pricing and Intangibles**

- Defining Intangibles in different regions
- Ascertaining the right arm's-length rates for intangibles
- Ownership of Intangibles

T. P. Ostwal, Partner, T.P. OSTWAL & ASSOCIATES, MUMBAI INDIA

1730 **Roundtable Discussion**
Handling Transfer Pricing Controversies

- Trends and strategies in transfer pricing audits
- Litigation considerations
- Developments in use of arbitration (and other alternative dispute resolution vehicles)
- Competent authority

1815 Closing Remarks from the Chairperson

1820 End of Day One Conference

Will the new powerful and pervasive new media eventually replace old media? Is the Digital Generation really turned off by marketing messages? How is traditional media responding? What are the opportunities presented by integrating traditional and new media?

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19th February 2008 I Programme Day 2

0830 Registration

0850 Opening Address from Chairperson

Dr Shanto Ghosh, Director and Economist Principal, DELOITTE HASKINS & SELLS

0900 **Case Study**

Merger & Acquisition and Transfer Pricing in India

Transfer pricing has become a standard item of tax when structuring a merger and acquisition transaction.

- Sharing of successful Merger & Acquisition experience
- The pitfalls arising from M&A

P.V. Srinivasan, Vice President (Corporate Taxation), WIPRO

0945 **Safe Harbour Provisions and Transfer Pricing**

- Grasping the uncertainties of transfer pricing
- Lowering the costs and pitfalls of taxes

Shyamal Mukherjee, Partner, Transfer Pricing, PRICE-WATERHOUSECOOPERS, INDIA

1030 Morning Coffee and Networking Break

1100 **Panel Discussion**

Solving competent authority cases in transfer pricing

With the rise of outsourcing companies found in India, the number of competent authority cases in transfer pricing in India are likely to increase. How are corporations likely to handle such conflicting cases? Can international double taxation be prevented? How are they supposed to answer to the government bodies' regulations and keeping adhere to them?

Moderator:
S.P. Singh, Senior Director, DELOITTE TOUCHE TOHMATSU INDIA

Panelists to be confirmed

1145 **Workshop A**

Effective Approaches to Preparing Transfer Pricing Documentation

- Assessing local transfer pricing requirements and exposures
- Preparing a global transfer pricing risk assessment
- Devising a game plan and timetable for preparing global documentation
- Key components and supporting information
- Maintenance and updates

Sanjay Tolia, Head of Transfer Pricing, PRICEWATERHOUSECOOPERS, INDIA

1245 Lunch & Networking Break

1400 **Workshop A Resumes**

1500 **Workshop B**

Managing Your Transfer Pricing Tax Risk

This workshop will help you identify the appropriate transfer pricing methods and opportunities to lower the effective corporate tax rate through transfer pricing. Mitigate the potential transfer pitfalls. Analyze and evaluate the potential tax exposure.

Mukesh Butani, Partner, BMR AND CO

1600 Afternoon Coffee and Networking Break

1630 **Workshop B Resumes**

1730 Closing Remarks from the Chairperson

1820 End of Conference

Registration Form

Please complete the details below and fax back to: **(65) 6225 4077**

Company Name ______________________

Name ______________________ **Position** ______________________

Name ______________________ **Position** ______________________

Name ______________________ **Position** ______________________

Tel ______________ **Fax** ______________ **E-mail** ______________________

Address ______________________

Authorisation

Name ______________________ **Position** ______________________

Date ______________________ **Signature** ______________________

Event Fee (Please tick ✓ the relevant box and circle your choice of attendance)
Please register me for:

	Conference Only
Standard Delegate Fee	☐ US$1,299
Early Bird (Book by 11th January 2008)	☐ US$1,099
Group booking	☐ US$999
Super Saver Fee (*Limited to first 10 delegates only*)	☐ US$799
If you are unable to attend the event, you may purchase the Documentation Pack	☐ US$499

NB: All prices quoted are per delegate fees in US Dollars
* Group Bookings are for 3 or more delegates invoiced to the same billing address.

Payment Method

Bank Transfer

For payments by bank transfers a transaction fee of $25 will be charged.

Account:	Avail Corporation Pte Ltd
Bank:	The Hongkong and Shanghai Banking Corporation Limited
Branch:	21 Collyer Quay, HSBC Building, #01-00 Singapore 049320
Account No:	260-365036-178
SWIFT Code:	HSBCSGSG

☐ **Credit Card**

☐ Visa ☐ Mastercard ☐ American Express

Card Holders Name: ______________________

Card Number: ______________________

Signature: ______________ **Expiry Date**: ____/____

Cancellations & Substitutions:

* Delegate Substitutions are welcome at any time up until the date of the event.
* If the client cancels their registration a 50% cancellation fee will be charged. All cancellations must be received two (2) weeks prior the event date in writing. After this date, payment must be met in full.
* If the event is cancelled, Avail Corporation will provide a full refund.
* If the event dates are changed due to any reason outside the control of Avail Corporation, your registration will be transferred to the new dates. If you are unable to attend on the new dates a credit of an equivalent amount to another conference will be provided or a refund of 85% of the event fee will be provided.

Indemnity:

Should the event be cancelled or the dates changed for any reason outside the control of Avail Corporation, the venue or speakers change, or due to an act of terrorism, extreme weather conditions, industrial action or natural disaster, Avail Corporation shall endeavor to re-schedule but the client hereby indemnifies Avail Corporation from and against any and all costs, damages and expenses, including legal fees, which are incurred by the client. The construction, validity and performance of this agreement shall be governed in all respects by the local law to the exclusive jurisdiction of whose courts the Parties hereby agrees to submit.

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