

### Workshop A - Managing Transfer Pricing Controversy in the Region

10:00 - 12:00

Main Conference Stage

We invite you to a workshop to discuss:

1. How tax authorities are approaching TP audits post BEPS
2. What dispute resolution strategies are most effective in the region
3. What does audit ready look like from a Company's perspective
4. How will COVID-19 change your supporting analysis and evidence going forward

#### Participants

**Jerry Wang** - Partner, DELOITTE

**Chris In** - Partner, DELOITTE KOREA

**David Letos** - Transfer Pricing Partner, DELOITTE

**Howard Osawa** - Partner, DELOITTE TOMOHATSU

**Karishma Phatarpekar** - Partner, DELOITTE INDIA

#### Lunch

12:00 - 13:00

Main Conference Stage

### Audit On The Pandemic Year – How Are Progressive Organizations Preparing?

13:00 - 15:00

Main Conference Stage

Part A: Trends from recent audits and regulatory developments – hints these hold for the future

We will discuss:

1. Is the pandemic year already under scrutiny?
2. Target industries and issues
3. Use of automatic exchange and technology by regulators
4. Experience from audit settlements
5. Litigation landscape and key outcomes

Part B: Tax authority positions on TP impacts of Covid – law of probability

We will discuss:

1. Covid specific TP guidance – OECD and local regulators
2. Reading in between the lines
3. Potential focus: industries and business models
4. Role of technology in proactive and progressive risk management

#### Participants

**Avik Bose** - TP Partner, DELOITTE SINGAPORE

**Shivaji Das** - TP Partner, DELOITTE INDONESIA

**Hanh Ding Mai** - TP Partner, DELOITTE VIETNAM

**Vrushang Sheth** - TP Partner, DELOITTE PHILIPPINES

**Gagan Deep Nagpal** - TP Partner, DELOITTE MALAYSIA

**Kancharat Thaidamri** - TP Partner, DELOITTE THAILAND

### Workshop C - To Be Confirmed

15:00 - 17:00

Main Conference Stage

# SCHEDULE

DAY 0 - WORKSHOPS - 21/09/2021

TP Minds Asia Digital

21 - 23 September 2021  
Digital Conference  
SGT/UTC+8 Time Zone

<b>TIME</b>	<b>MAIN CONFERENCE STAGE</b>
<b>10:00</b>	<b>10:00</b> - Workshop A - Managing Transfer Pricing Controversy in the Region
<b>11:00</b>	
<b>12:00</b>	<b>12:00</b> - Lunch
<b>13:00</b>	<b>13:00</b> - Audit On The Pandemic Year – How Are Progressive Organizations Preparing?
<b>14:00</b>	
<b>15:00</b>	<b>15:00</b> - Workshop C - To Be Confirmed

### Chair's Opening Remarks

09:00 - 09:10

Main Conference Stage

### Participants

**Anis Chakravarty** - Partner, DELOITTE

### OECD Keynote Address

09:10 - 09:40

Main Conference Stage

### Participants

**Michael Nixon** - Senior Advisor, TTP Unit, OECD

### Transfer Pricing Outlook From APAC Policy Makers

09:40 - 10:30

Main Conference Stage

Hear individual updates from the OECD, Australia, Singapore and the UN straight from the policy makers on what you need to know about tax in their jurisdictions and current updates.

### Participants

**Moderator: Anis Chakravarty** - Partner, DELOITTE

**Michael Nixon** - Senior Advisor, TTP Unit, OECD

**Michael Kobetsky** - Member, UN TRANSFER PRICING SUBCOMMITTEE

**Sing Yuan Yong** - Tax Director, INLAND REVENUE AUTHORITY OF SINGAPORE

**Shahzeb Panhwar** - Assistant Commissioner, AUSTRALIAN TAXATION OFFICE

### Morning Coffee Break

10:30 - 10:50

Main Conference Stage

### BEPS 2.0 and Pillars 1 & 2 Tax Updates - In an APAC Context

10:50 - 11:40

Main Conference Stage

### Participants

**Moderator: Jun Igarashi** - Partner, DELOITTE

**Hardeep Lamba** - Associate Tax Director, JOHNSON & JOHNSON

**Kinjesh Thakkar** - Head of International Tax and Transfer Pricing, LINDE ENGINEERING

### How Are APAC MNE's Responding to the Transition Out of COVID?

11:40 - 12:30

Main Conference Stage

### Participants

**Umang Dhingra** - Head of Tax, GSK ASIA

**Eugene Gay** - Head of Tax, Asia Pacific, MARSH MCLENNAN

**Vineet Rachh** - Associate Director - Taxes, PROCTOR & GAMBLE

**Moderator: Jiger Saiya** - Partner and Leader of Tax Regulatory Services, BDO

### Lunch Break + Demo by Royalty Range

12:30 - 13:30

Main Conference Stage

Join our partners from Royalty Range for a demonstration of their latest services beginning at 12:30pm.

### Lessons Learned from Recent Tax Audits

13:30 - 14:20

Main Conference Stage

### Participants

**Tom Toryanik** - Executive Director, NOMURA

**Abbas Zahid** - Asia Pacific Tax Director, SCHLUMBERGER

**Moderator: Koh Yun Qi** - Associate Director, BDO

### APA's, MAP and Reducing Tax Risk

14:20 - 15:10

Main Conference Stage

### Participants

**Steffen Voll** - Tax Director, OLYMPUS JAPAN

**Alok Pareek** - Head of Tax, DISCOVERY INDIA

**Moderator: Brad Edwards** - Transfer Pricing Director, DELOITTE

**Coralie Trotter** - Head of Tax Rest of World - Asia Pacific, Middle East and Russia, SHELL

### Afternoon Coffee Break

15:10 - 15:30

Main Conference Stage

### Tax Developments Around Global Value Chain and Transformation

15:30 - 16:20

Main Conference Stage

### Participants

**Cassandra Soon** - Director, Transfer Pricing, CBRE

**Rahul Punjabi** - International Tax Director, OLX GROUP

**Moderator: Masako Hikota** - Regional Tax Advisor, KYNDRYL

### Chair's Closing Remarks

16:20 - 16:30

Main Conference Stage

### Participants

**Anis Chakravarty** - Partner, DELOITTE

# SCHEDULE

CONFERENCE DAY 1 - 22/09/2021

TP Minds Asia Digital

21 - 23 September 2021  
Digital Conference  
SGT/UTC+8 Time Zone

<b>TIME</b>	<b>MAIN CONFERENCE STAGE</b>
<b>09:00</b>	<b>09:00</b> - Chair's Opening Remarks <b>09:10</b> - OECD Keynote Address <b>09:40</b> - Transfer Pricing Outlook From APAC Policy Makers
<b>10:00</b>	<b>10:30</b> - Morning Coffee Break <b>10:50</b> - BEPS 2.0 and Pillars 1 & 2 Tax Updates - In an APAC Context
<b>11:00</b>	<b>11:40</b> - How Are APAC MNE's Responding to the Transition Out of COVID?
<b>12:00</b>	<b>12:30</b> - Lunch Break + Demo by Royalty Range
<b>13:00</b>	<b>13:30</b> - Lessons Learned from Recent Tax Audits
<b>14:00</b>	<b>14:20</b> - APA's, MAP and Reducing Tax Risk
<b>15:00</b>	<b>15:10</b> - Afternoon Coffee Break <b>15:30</b> - Tax Developments Around Global Value Chain and Transformation
<b>16:00</b>	<b>16:20</b> - Chair's Closing Remarks

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## Chair's Opening Remarks

09:00 - 09:10  
Main Conference Stage

### Participants

**Carlo Navarro** - SEA Transfer Pricing Leader, DELOITTE

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## Transfer Pricing - The Next Evolution

09:10 - 09:40  
Main Conference Stage

### Participants

**Robert Stack** - Former Deputy Assistant Secretary for International Tax Affairs, US Department of Treasury, Managing Director, DELOITTE

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## Digital Transformation in the APAC Region

09:40 - 10:30  
Main Conference Stage

### Participants

**Jordi Bonabosch** - Head of Tax, INSEAD

**Navneet Singal** - Head of Tax and Digital Transformation, SYNGENE INTERNATIONAL LIMITED

**Luis Carrillo** - Transfer Pricing Director, BUREAU VAN DIJK

**Clara Tse** - Regional Tax Manager, BASF

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## Morning Coffee Break

10:30 - 10:50  
Main Conference Stage

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## COVID Adjustments for Transfer Pricing

10:50 - 11:30  
Main Conference Stage

### Participants

**Vrajesh Dutia** - Partner, DELOITTE

**Anis Chakravarty** - Partner, DELOITTE

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## Permanent Establishments - Where Are We Now?

11:30 - 12:20  
Main Conference Stage

### Participants

**Chris Wood** - Tax Director - APAC, DB SCHENKER

**Poonam Sidhu** - Tax Director, INDIA REVENUE SERVICE

**Ramesh Khaitan** - Sr Vice President -Direct Tax Head, LUPIN LIMITED

**Amit Gupta** - Tax Director, DELL

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## Lunch Break

12:20 - 13:20  
Main Conference Stage

12:30 - 12:50

Join our speakers from BDO for 20 minute session rounding up developments country by country in the APAC region.

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## APAC Roundup with BDO

13:20 - 14:10  
Main Conference Stage

### Participants

**Ishan Shah** - Director, BDO THAILAND

**Elis Tan Siok Ping** - Executive Director, Transfer Pricing, BDO SINGAPORE

**Michelle Mianova** - Partner, BDO INDONESIA

**Pankil Sanghvi** - Partner, Tax and Regulatory Services, BDO

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## In-house Approaches to Operational Tax Challenges

14:10 - 15:00  
Main Conference Stage

The in-house transfer pricing function has had to adapt to ever changing requirements whilst becoming increasingly in demand by the business to assist with a wide range of strategic business needs. As a result there are new operational challenges, notwithstanding the existing pressures on resources and time. Through using real life examples of day to day requirements of the transfer pricing function, this session will explore:

- What are some of the operational challenges, faced by the transfer pricing function
- Whether we need to adapt how we view and address these operational challenges in light of how they may have changed over time
- What approaches have been applied in practice to address some of these operational tax challenges.

### Participants

**Moderator: Mark Carlton** - Director, DELOITTE

**Liming Zhu** - Tax Director, China, QUALCOMM

**Cassandra Soon** - Director, Transfer Pricing, CBRE

**Kaushal Kapadia** - Asia Tax Director, ULTRA CLEAN TECHNOLOGY

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## Afternoon Coffee Break

15:00 - 15:20  
Main Conference Stage

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## The Latest US Tax Updates Affecting APAC Businesses

15:20 - 16:10  
Main Conference Stage

### Participants

**Sarah Ng** - Regional Tax Director, ABBVIE

**Annie Pan** - Membership Committee Lead, TAX EXECUTIVES INSTITUTE

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## Chair's Closing Remarks

16:10 - 16:25  
Main Conference Stage

### Participants

**Carlo Navarro** - SEA Transfer Pricing Leader, DELOITTE

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# SCHEDULE

CONFERENCE DAY 2 - 23/09/2021

TP Minds Asia Digital

21 - 23 September 2021  
Digital Conference  
SGT/UTC+8 Time Zone

TIME	MAIN CONFERENCE STAGE
09:00	09:00 - Chair's Opening Remarks 09:10 - Transfer Pricing - The Next Evolution 09:40 - Digital Transformation in the APAC Region
10:00	10:30 - Morning Coffee Break 10:50 - COVID Adjustments for Transfer Pricing
11:00	11:30 - Permanent Establishments - Where Are We Now?
12:00	12:20 - Lunch Break
13:00	13:20 - APAC Roundup with BDO
14:00	14:10 - In-house Approaches to Operational Tax Challenges
15:00	15:00 - Afternoon Coffee Break 15:20 - The Latest US Tax Updates Affecting APAC Businesses
16:00	16:10 - Chair's Closing Remarks