

2019 Asia Pacific Tax Litigation Conference

14 March | Singapore



Time	Topic	Speakers
8:30 am - 9:00 am	Registration	
9:00 am - 9:10 am	Welcome and Introduction (10 mins)	Ponti Partogi, Indonesia
9:10 am - 10:40 am	<p>Update on Tax Audit and Controversy Trends (90 mins)</p> <p>An update on tax disputes and controversy trends, recent policies adopted by authorities, and key significant case law developments in the region.</p>	<p>Moderator: Ponti Partogi, Indonesia</p> <p>Panel: Jason Wen, China Steven Sieker, Hong Kong Sanjiv Malhorta, India Daru Hananto, Indonesia Jason Liang, Malaysia Ronald Bernas, Philippines Chun Ying Ng, Singapore Panya Sittisakonsin, Thailand Thanh Vinh Nguyen, Vietnam Maria Kostenko, Europe Mark Oates, US</p>
10:40 am - 10:55 am	Coffee break (15 mins)	
10:55 am - 11:40 am	<p>Tax Investigations, Tax Raids and Criminalization of Tax Offences (45 mins)</p> <p>We have seen tax authorities globally are increasingly active and aggressive in conducting tax investigations and tax raids. We will discuss the trends and practices adopted by the authorities in this respect, as well as the do's and don'ts for a taxpayer to manage tax investigations and tax raids. We will also discuss taxpayer's increased exposure to the criminalisation of tax audits and liabilities in today's environment, and how one may navigate such challenges.</p>	<p>Moderator: Jason Liang, Malaysia</p> <p>Panel: Jason Wen, China Steven Sieker, Hong Kong Daru Hananto, Indonesia Ariane Calloud, Europe Mark Oates, US</p>
11:45 am - 12:30 pm	<p>Transfer Pricing Disputes – Audits, APAs, MAP (45 mins)</p> <p>The transfer pricing of intercompany relationships are increasingly being put under scrutiny across the world. Tax authorities are interested in understanding where the value is created and often adopt alternative approaches in defining and measuring value creation – and who is entitled to tax it. The combination of the increased scrutiny and divergent approaches makes disputes both more likely and more challenging to resolve: a combination of facts that make litigation and alternative dispute resolution procedures more necessary to be used in future. Our transfer pricing experts will provide insights regarding how to best handle transfer pricing audits and litigation with practical considerations in mind.</p>	<p>Moderator: Michael Nixon, Singapore</p> <p>Panel: Jason Wen, China Sanjiv Malhorta, India Nuthari Borpitpitak, Thailand Thanh Vinh Nguyen, Vietnam Mark Oates, US</p>
12:30 pm - 1:30 pm	Lunch Break (60 mins)	

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Novotel Clark Quay | Singapore

Time	Topic	Speakers
1:30 pm - 2:30 pm	<p>Tax Authorities' Information-Gathering Powers and Exchange of Information – Privacy, Confidentiality and Privilege During Tax Disputes (60 mins)</p> <p>Tax authorities are granted extensive powers to collect information from taxpayers to administer local taxes as well as for exchange of information with treaty partners. Are there any limitations to such powers? Do taxpayers still have any rights to resist? In this session, we discuss the legal limitations to the tax authorities' information-gathering powers and how and the extent to which the taxpayers can assert their rights.</p>	<p>Moderator: Chun Ying Ng, Singapore</p> <p>Panel: Jason Wen, China Kellie Yap, Malaysia Alexander Ner, Philippines Jana Fischer, Europe</p>
2:35 pm - 3:35 pm	<p>Fact-Building – How to Build Facts in a Tax Controversy (60 mins)</p> <p>Taxpayers and tax practitioners often focus on the strength of their technical substance position when litigation is inevitable. However, "fact-building" is arguably just as, if not more important, as facts form the bedrock for the court's legal analysis. In this session, we will peruse two case studies to provide insight into the various techniques in building and delivering effective narrative in court. The session is designed to be interactive and there will be ample opportunities for Q&A to address your queries.</p>	<p>Moderator: Allen Tan, Singapore</p> <p>Panel: Steven Sieker, Hong Kong Ponti Partogi, Indonesia Ronald Bernas, Philippines Panya Sittsakonsin, Thailand Thanh Vinh Nguyen, Vietnam</p>
3:40 pm - 4:00 pm	<p>Q&A, wrap-up and closing (20 mins)</p>	<p>Allen Tan, Singapore</p>