

**Bangalore Branch of ICAI Announces
An Intensive Weekend Workshop on “International Taxation”
(IV Batch)**

2nd May 2009 to 08th August 2009 (tentative dates of the workshop)

DATE	TOPIC	DURATION	Speakers
Day 1 02.05.09	1. Historical Overview, Main Trends and Evolution of various model conventions 2. Interpretation of Tax Treaties – Recent OECD Developments	4 hours 10.30am to 4.30pm	CA. T.P. Ostwal
	Total	4 hours	
Day 2 09.05.09	3. Interest / Dividend / Capital Gain 4. Permanent Establishment Article 5	4 hours	CA. S. Ramasubramaniam
	Total	4 hours	
Day 3 16.05.09	5. Concept of Residence in Tax Treaties i.e Article 4 6. Income from Immovable Properties	4 hours	CA. Rishi Harlalka
	Total	4 hours	
Day 4 23.05.09	7. Business Income including Force of Attraction 8. Attribution of profits to a PE	4 hrs	CA. Nitin Karve
	Total	4 hours	
Day 5 30.05.09	9. Challenges in International Taxation		CA. S. Krishnan
	Total	4 hours	
Day 6 06.06.09	Royalties and Fees for Technical Services and most Favored nation related to such payment	4 HRS	CA. K. K. Chythanya
	Total	4 hours	
Day 7 13.06.09	10. Elimination of Double Taxation 11. Mutual Agreement Procedures and exchange of information 12. Authority for Advance Ruling	4 hours	CA. P V Srinivasan
	Total	4 hours	
Day 8 20.06.09	13. Deduction of tax at source u/s. 195 & DTAA 14. Agent of non Resident	3 hours 1 hour	CA. Sriram Seshadri Chennai
	Total	4 hours	
Day 9 27.06.09	15. Concept of thin Capitalization Current controversial issues in International Taxation. 16. Electronic Commerce and Taxation 17. Taxation of Income from Shipping and Air Transport services	1 hour 3 hours	K R Sekar
	Total	4 hours	
Day 10 04.07.09	18. Partnership under the law of Tax Treaties 19. Triangular cases 20. Beneficial ownership under tax treaties	1 & ½ hours 1 & ¼ hours 1 & ¼ hours	CA. Hitesh Gajaria Mumbai
	Total	4 hours	
Day 11	21. Tax haven Countries	2 hours	CA. Sampath

11.07.09	22. Cross – Border Mergers & Acquisitions – Tax consideration	2 hours	Raghunathan Hyderabad
	Total	4 hours	
Day 12 18.07.09	23. Independent Personal Services 24. Tax implication attaching expatriates	2 hours 2 hours	CA. Padam Chand Khincha
	Total	4 hours	
Day 13 25.07.09	How to read the tax treaty 1. India – UAE Treaty and Protocol 2. India – Maurities Treaty 3. India UK DTAA 4. India – Singapore India – Netherlands Treaty	2 hours 2 hours	CA. Rajendra Nayak
	Total	4 hours	
Day 14 01.08.09	E C Treaties – Parent Subsidiary Directives – Interest and Royalty Directives 25. Concept of Controlled foreign corporation hybrid/ financial instruments	4 hours	CA. Rashmin Sanghvi, Mumbai
	Total	4 hours	
Day 15 08.08.09	<u>Transfer Pricing</u> 26. Introduction – International Transaction – Associated Enterprises. 27. Arm’s Length Price – Computation of Arm’s Length Price-Documentation	4 hours	CA. Shantha Ghosh
	Total	4 hours	
Day 16 15.08.09 Or 14.08.09 (EVENING)	28. Taxation of Entertainers and Athletes 29. Other income under tax treaties Non – Discrimination and recovery of taxes on behalf of other states Valedictory session will be followed by Dinner	4 hours 2.30pm to 6.30pm 6.45pm to 8.00pm	CA. Abhishek Goenka
	Total	2 hours	

Note:

- **Sessions - subject to change**
- **Breakfast will be served on all Saturdays at 8.30am on all the days of the course**
- **On inaugural day, 2nd May 2009 Sessions will be conducted between 10.30am and 4.30pm and lunch will be provided in between.**
- **On 14th August 09,(Concluding) Technical Session will be conducted between 2.30pm and 6.30pm followed by valedictory session and dinner**

Registration: Limited to 60 seats, Registration will be on first come first serve basis.

Course Fee: Rs. 15,000/- for Members

Rs. 18,000/- for Non – Members

Cheque/DD to be drawn in favour of “Bangalore Branch of SIRC of ICAI”

For Further details

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