



MANAGING YOUR BUSINESS
STRATEGIES ON TAX DISPUTES
AND CONTROVERSIES

2018 Asia Pacific Tax Litigation Seminar

23 March 2018 | Swissotel The Stamford | 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 - 10:25 am	Recent Developments in the Tax Litigation Sector (75 mins) Update on tax disputes and controversy trends, recent policies adopted by authorities, and case law updates in the region.	Moderator: Ponti Partogi, Indonesia Panelists: Abe Zhao, China Carrie Lui, Hong Kong Daru Hananto, Indonesia Ed Whatley, Japan Jason Liang, Malaysia Ronald Bernas, Philippines Allen Tan, Singapore Panya Sittisakonsin, Thailand Thanh Vinh Nguyen, Vietnam
10:25 am - 10:45 am	Coffee break (20 mins)	
10:45 am - 11:45 am	The Tax Litigation Process (60 mins) An overview of the tax litigation processes from various Asian countries, including key do's and don'ts in managing a tax dispute.	Moderator: Allen Tan, Singapore Panelists: Abe Zhao, China Carrie Lui, Hong Kong Daru Hananto, Indonesia Jason Liang, Malaysia Panya Sittisakonsin, Thailand Thanh Vinh Nguyen, Vietnam
11:45 am - 1:15 pm	Networking lunch (90 mins) <i>Location: Hullet room, level 4, Swissotel The Stamford</i>	
1:15 pm - 2:15 pm	Defending Transfer Pricing Positions (60 mins) As Transfer Pricing has become a focus for recent tax litigations worldwide, Transfer Pricing Documents would play a crucial role to defend the Transfer Pricing position of a company. Therefore, it is very important to understand how to defend the Transfer Pricing Documents, in particular defending the new Transfer Pricing Documents that recently been introduced by OECD BEPS (Local File, Master File, and Country by Country File).	Moderator: Peter Tan, Singapore Panelists: Abe Zhao, China Daru Hananto, Indonesia Ed Whatley, Japan Ronald Bernas, Philippines Mike Nixon, Singapore Chun Ying Ng, Singapore Chanida Leelanuntakul, Thailand
2:15 pm - 2:35 pm	Coffee break (20 mins)	
2:35 pm - 3:35 pm	Managing Tax Audits and Disputes in the Age of Transparency (60 mins) The implementation of tax transparency measures globally has had a huge impact on the way tax administrations audit and challenge taxpayers' positions. In this session, we will take a look at how tax authorities have made use of EOI in tax audits and disputes, and how countries have supported their treaty partners in such endeavours. We will discuss the scope of the EOI regime, what are the possible legal challenges one can mount against EOI (or if any at all), and what protective measures one may take in managing tax disputes in this environment.	Moderator: James Choo, Singapore Panelists: Carrie Lui, Hong Kong Ed Whatley, Japan Jason Liang, Malaysia Ronald Bernas, Philippines Chun Ying Ng, Singapore Thanh Vinh Nguyen, Vietnam
3:35 pm - 4:00 pm	Q&A, wrap-up and closing (25 mins)	Allen Tan, Singapore