

**Baker
McKenzie.**

38th Annual

Asia Pacific Tax Conference

20-21 November 2024 | Conrad Centennial Singapore

Updated as of 7 November 2024

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About the event

Stay connected with the latest insights and tax developments in the Asia Pacific region at **Baker McKenzie's 38th Annual Asia Pacific Tax Conference** at the **Conrad Centennial Singapore** on **20 and 21 November 2024**.

The Future of Tax: What Lies Ahead?

Today's business and tax leaders must contend with an increasingly complex tax, regulatory and economic landscape. The shift in the international tax system is well underway, with the OECD Pillar Two already effective in some jurisdictions, and more jurisdictions preparing to implement it next year. Tax positions are under heightened scrutiny by governments and tax authorities globally.

As businesses seek to retain their competitive edge, there is growing focus on ESG, fast-evolving technologies and AI, which may reshape operations and the tax function, as well as ensure a more sustainable future. To help you navigate uncharted waters and position your business for success, our subject matter experts from across Asia Pacific and globally will gather to examine key developments. We will share insights on the potential impact of the latest trends and emerging issues on your business models and strategies, and have open conversations on how you can maximize opportunities and mitigate risks in this era of transformation.

The conference will cover the most relevant topics in 2024 and feature breakout sessions that tackle various current issues, including significant developments in regional tax, transfer pricing and indirect taxes, the impact of international tax changes on business reorganizations, the latest tax audit trends, and emerging tax issues in light of ESG and the advancement of AI. The conference will also feature a keynote speech on predictions for 2025 US tax legislation.

We look forward to seeing you in Singapore at the conference.

Best regards,



Adeline Wong
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Allen Tan
Principal, Singapore
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Dawn Quek
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Agenda – Day 1

Wednesday, 20 November 2024

8:00 am – 8:55 am

Registration

8:55 am – 9:00 am

Opening Remarks



Allen Tan
Principal, Singapore
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9:00 am – 9:25 am

Welcome Address



Adeline Wong
Chair, Asia Pacific Tax Practice Group
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Dennis Lui
Deputy Commissioner, Indirect Taxes,
Law & Investigation Group
Inland Revenue Authority of Singapore

9:25 am – 10:40 am

Plenary Session 1: Asia Pacific Tax Updates – Part 1

Asia Pacific governments continue to break new ground by implementing tax changes that present both challenges and opportunities for businesses. In this fast-paced session, a highly experienced panel of tax practitioners will guide you through the latest and most significant tax developments in the region and their potential impact on businesses.

MODERATOR



Dawn Quek
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SPEAKERS:



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10:40 am – 11:00 am

Coffee Break



11:00 am – 11:50 am

Breakout Session – Part 1A: Tax Cases Update

Back by popular demand, our tax litigation experts will highlight the most significant and interesting cases from jurisdictions in the Asia Pacific region over the past year. Some key cases that will be covered include the Keysight decision (Malaysia) on the disposal of intellectual property rights, the PepsiCo decision (Australia) regarding cross-border intellectual property licensing arrangements and the Singapore Cement decision (Singapore) on the claiming of capital allowances for plant and machinery. We will dissect these cases and provide valuable insights into how these judicial developments will impact businesses from both practical and planning perspectives.

MODERATOR

Jeremiah Soh
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SPEAKERS:

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Anlynn Ng
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11:00 am – 11:50 am

Breakout Session – Part 1B: Navigating VAT/GST Challenges in Asia Pacific

Asia Pacific governments are continuing to reform their indirect tax systems to adapt to the evolving business landscape in this digitalized world. The issues which businesses should consider are confounded with the tax authorities' desire to ensure tax parity in the taxation of physical and digital transactions, enhancing transparency with continuous transaction control mechanisms such as e-invoicing as well as increasing tax revenue through indirect taxes. In this interactive session, we will share key developments, insights on the impact of new VAT/GST initiatives, practical strategies for businesses to mitigate risks and emerging trends that affect the management of indirect tax issues.

MODERATOR

Yvonne Beh
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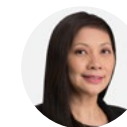
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12:00 pm – 12:50 pm

Breakout Session – Part 2A: Managing Supply Chain Challenges Amid a Changing Geopolitical Landscape: A Trade Perspective

As the geopolitical landscape in Asia Pacific evolves, supply chain challenges for companies operating in the region have shifted significantly from just a few years ago. Traditional tax-related challenges, such as customs audits, remain ongoing due to intensified efforts by customs authorities in tax collection. These challenges are now compounded and often intertwined with increasingly complex geopolitical issues. In recent times, a wide range of geopolitical events have culminated in sanctions and other measures, requiring companies to reorganize their supply chains, functions and activities across jurisdictions. In addition, we expect further escalation of anti-dumping, countervailing and other punitive duty measures, affecting supply chains within the region. As a multinational company's response to these challenges have implications on tax compliance and planning, a holistic strategy from both trade and tax perspectives is crucial. Our panel of speakers will share insights on the latest customs audit trends and geopolitical issues with tax implications, based on our practical experience and case studies.

MODERATOR**Ivy Tan**

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12:00 pm – 12:50 pm

Breakout Session – Part 2B: Tax Issues Arising from the Development and Commercialization of AI

With swift advancements in AI and other technology innovations, MNEs are finding new ways of using AI in their business operations. Our panel of experts will discuss how substituting AI for humans impacts a number of international tax issues, including permanent establishments, sourcing of services income, etc. We will also discuss the interplay between AI and existing tax rules, which may create complications and potential disputes for MNEs.

MODERATOR**Allen Tan**

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SPEAKERS:**David Schultz**

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12:50 pm – 2:00 pm

Lunch and Keynote Message

Jillian Lim
Executive Vice President
Singapore Economic Development Board

2:00 pm – 2:50 pm

Breakout Session – Part 3A: Practical Tax Considerations in M&A Transactions and Corporate Reorganizations including Carveouts and PAI

M&A transactions are critical for corporations looking to streamline their businesses, raise funds or dominate the market. With the changing tax landscape and implementation of Pillar Two, the applicable rules are becoming increasingly complex. In this session, our panel of experts will discuss the future of M&A planning and the use of tax insurance, and touch on corporate reorganizations including carveouts and planning for post-divestiture legal and supply chain structure. We will also highlight practical considerations that in-house tax professionals should be aware of in cross-border M&A deals.

MODERATOR

Brendan Kelly
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2:00 pm – 2:50 pm

Breakout Session – Part 3B: Managing Transfer Pricing Controversies in Asia Pacific

Cross-border tax disputes are becoming more frequent and complex, with tax authorities taking increasingly aggressive positions and unilateral measures that result in double taxation. We will look at how APAs and MAPs can be used to manage and resolve cross-border tax disputes and improve tax certainty. Additionally, we will share our practical experience and discuss some key questions (e.g., on managing requests for information and EOI) and decision-driving issues that taxpayers must consider when deciding whether to initiate a proceeding.

MODERATOR

Luke Tanner
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3:00 pm – 3:30 pm

Coffee Break

3:30 pm – 4:20 pm

Breakout Session – Part 4A: Unlocking the Intersection Between ESG and Tax

Environmental, social and governance (ESG) is now more important than ever for businesses, as investors and key stakeholders realize that ESG facilitates long-term value creation. Against this backdrop, this panel will share how tax intersects with ESG, and discuss the challenges and opportunities for tax leaders in not only supporting their organization's ESG journey but also adding value to it.

MODERATOR

Alexandra Stead
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Rafic Barrage
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3:30 pm – 4:20 pm

Breakout Session – Part 4B: Globally Mobile Employees

The post-pandemic world has permanently altered the work landscape, shattering the traditional, office-centric approach. Working from home or anywhere in the world is now commonplace. In this session, our panel of experts will delve into the corporate tax issues, such as tax residency, permanent establishment complications and transfer pricing considerations, which businesses should consider when planning their flexible working arrangement policies.

MODERATOR

Amy Ling
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4:30 pm – 5:45 pm

Plenary Session 2: Managing Audits in Asia Pacific

In recent years, there has been an unprecedented level of scrutiny by tax authorities on the tax affairs of businesses. This session will focus on the hot-button topics and the latest tax audit trends and developments in the Asia Pacific region. We will share effective ways to handle tax audits and manage the risks of tax litigation.

MODERATOR**Ponti Partogi**

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SPEAKERS:**Simone Bridges**

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6:00 pm onwards

Dinner Reception

Agenda – Day 2

Thursday, 21 November 2024

8:00 am – 9:00 am

Registration

9:00 am – 9:15 am

Opening Remarks



Allen Tan
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9:15 am – 10:30 am

Plenary Session 3: Asia Pacific Tax Updates – Part 2

Asia Pacific governments continue to break new ground by implementing tax changes that present both challenges and opportunities for businesses. In this fast-paced session, a highly experienced panel of tax practitioners will guide you through the latest and most significant tax developments in the region and their potential impact on businesses.

MODERATOR



Shih Hui Lee
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SPEAKERS:



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10:30 am – 10:45 am

Coffee Break



10:45 am – 12:00 pm

Plenary Session 4: Is There a Future for Tax Planning?

This session discusses the impact of key international tax changes including Pillar Two and related anti-avoidance initiatives, and the effect of these initiatives on business reorganizations. We will focus on tax planning measures and taxpayer behaviors that we have observed and how we expect tax authorities and government agencies to react to them. We will also exchange views on what we envisage the various domestic tax landscapes to look like in light of the various international tax changes, and how that is likely to impact tax planning and reorganizations moving forward.

MODERATOR

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12:00 pm – 12:45 pm

Keynote Message: Predictions for 2025 US Tax Legislation**SPEAKERS:**

Gary Sprague
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Stewart Lipeles
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12:45 pm – 1:00 pm

Closing Remarks

Allen Tan
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1:00 pm – 2:00 pm

Lunch

Baker McKenzie delivers integrated solutions to complex challenges.

Complex business challenges require an integrated response across different markets, sectors and areas of law. Baker McKenzie's client solutions provide seamless advice, underpinned by deep practice and sector expertise, as well as first-rate local market knowledge. Across more than 70 offices globally, Baker McKenzie works alongside our clients to deliver solutions for a connected world.

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