

**Baker
McKenzie.**

First in Asia Pacific.

39th Annual

Asia Pacific Tax Conference

12-13 November 2025 | Hilton Tokyo

Updated as of 11 November 2025

Moderators and speaker have now been added to the program.

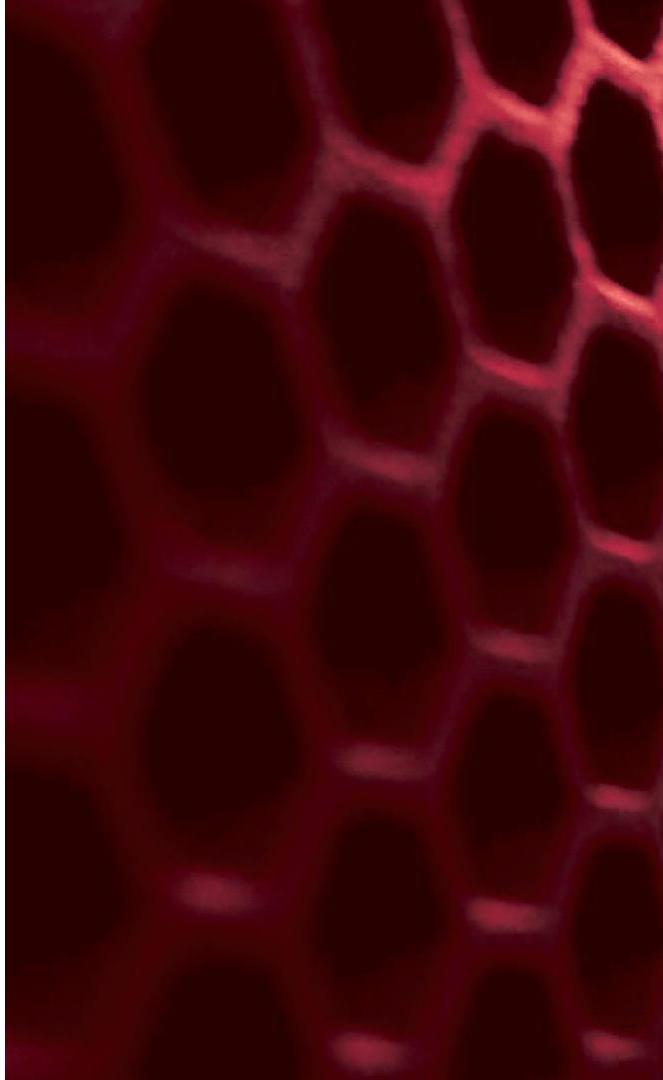
Agenda

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About the event

The Future of Tax in a Geopolitically Transformed World

We are pleased to invite you to **Baker McKenzie's 39th Annual Asia Pacific Tax Conference** at the **Hilton Tokyo** on **12-13 November 2025**.

Join us as we bring together our leading tax lawyers and practitioners from across Asia Pacific, Europe, and the United States to share strategic insights into the latest developments and trends shaping the global and regional tax landscape.

In an era of ongoing global uncertainty, we will examine pressing issues such as the impact of continued tariff shifts and the growing complexity of global and local tax environments on your business models and strategies. We will discuss how you can achieve resilience and growth amidst these challenges, providing guidance on managing tax affairs, optimizing positions, and mitigating compliance risks.

In addition to jurisdiction-specific updates covering Australia, Mainland China, Hong Kong, India, Indonesia, Japan, Korea, Malaysia, Philippines, Singapore, Taiwan, Thailand and Vietnam, we will discuss some of the most critical issues shaping the tax landscape. Key themes include addressing the tax and transfer pricing challenges arising from ongoing tariff turbulence, as well as the complexities of Pillar Two. We will also cover other high-impact topics in a series of focused breakout sessions, including cross-border M&A structuring, intragroup reorganizations, tax audit and controversy management, recent developments in tax case law, strategic approaches to APAs, MAP, and ICAP, the evolving VAT/GST landscape, tariff mitigation strategies and supply chain resilience, and outbound investments from Japan.

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

Best regards,



Allen Tan
APAC Chair, Tax Practice,
Singapore
allen.tan@bakermckenzie.com



Ryutaro Oka
Partner, Japan
ryutaro.oka@bakermckenzie.com



Adeline Wong
Partner, Malaysia
Wong & Partners
adeline.wong@wongpartners.com

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to request one-on-one
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Agenda – Day 1

Wednesday, 12 November 2025

8:00 am – 9:00 am

Registration

9:00 am – 9:15 am

Welcome Address

9:15 am – 10:30 am

Plenary Session 1: Asia Pacific Tax Updates – Part 1

In a time of geopolitical instability and macroeconomic uncertainty, Asia Pacific governments are under pressure to seek revenue wherever they can. Changes to tax laws and policies continue as governments attempt to protect or expand their tax base and improve tax collection. Companies need to stay agile and well-informed to navigate the increasingly complex landscape effectively. In this dynamic session, a highly experienced panel of tax practitioners will guide you through the latest and most significant tax trends and developments in the region, discussing their potential impact on businesses.

Moderator:



Ryutaro Oka
Partner, Japan

Speakers:



Pierre Chan
Partner, Hong Kong



Sanjiv Malhotra
Head of Tax Practice, India
Shardul Amarchand
Mangaldas & Co.



Niken Kristalia
Associate Partner
Indonesia
HHP Law Firm



Akihiro Kawasaki
Partner, Japan



Seonhye Kim
Senior Associate, Korea
Baker McKenzie KLP JV



Adeline Wong
Partner, Malaysia
Wong & Partners



Thanh Vinh Nguyen
Partner, Vietnam
BVMN

10:30 am – 10:50 am

Coffee Break

Agenda – Day 1

Wednesday, 12 November 2025

10:50 am – 11:50 am

Breakout Session – Part 1A: Cross-Border M&As: Managing Deal Structuring Challenges

Structuring a third-party M&A transaction requires navigating a complex array of commercial and tax considerations. Early decisions around entity selection, jurisdiction, funding, and overall deal architecture are critical to managing future tax exposures and streamlining execution. This session will explore key tax structuring issues for both buyers and sellers, with a particular focus on transactions involving Japan on either side of the deal. Our panel will discuss recent tax developments in Japan and across the region, as well as selected Pillar Two implications relevant to M&A that are shaping due diligence priorities and influencing deal structures. We will also consider the growing role of W&I insurance in managing transactional risk. Throughout the session, our experts will share practical insights and highlight jurisdictional nuances.

Moderator:



Luis Zhang
Partner, China
Baker McKenzie FenXun

Speakers:



Miles Hurst
Partner, Australia



Carrie Lui
Special Counsel
Hong Kong



Niken Kristalia
Associate Partner
Indonesia
HHP Law Firm



Akihiro Kawasaki
Partner, Japan



Wibren Veldhuizen
Partner, Netherlands



Shih Hui Lee
Principal (Tax Advisor)
Singapore



Rafic Barrage
Partner, United States

10:50 am – 11:50 am

Breakout Session – Part 1B: APAs, MAP and ICAP

Cross-border tax disputes are on the rise, becoming more frequent and complex as tax authorities adopt increasingly aggressive positions and take unilateral measures. These actions often result in double taxation, creating significant challenges for multinational enterprises. Join us for an insightful session on advance pricing arrangements (APAs), the mutual agreement procedure (MAP), and the International Compliance Assurance Programme (ICAP), where our experts will guide you through the intricacies of these essential tools for achieving tax certainty and effective dispute resolution. We will explore the benefits and challenges of these tools, providing practical tips and strategies.

Moderator:



Luke Tanner
Partner, Japan

Speakers:



Shanwu Yuan
Principal Economist
China / United States



Muh. Ichwanuddin
Tax Specialist, Indonesia
HHP Law Firm



Koji Oshima
Economist/Partner
Japan



Doug Suh
Senior Advisor, Korea
Baker McKenzie KLP JV



Geoffrey Soh
Head, Transfer Pricing
Thailand



Jennifer Best
Senior Counsel
United States



Jukka Karjalainen
Partner, United Kingdom

Agenda – Day 1

Wednesday, 12 November 2025

12:00 pm – 1:00 pm

Breakout Session – Part 2A: Corporate Reorganizations: Toeing the Lines of Planning and Mitigating Tax Risks

As tax authorities around the world intensify their scrutiny of MNEs, internal restructurings may be increasingly perceived as potential means of aggressive tax planning. In this session, our experts will explore the latest domestic and international developments shaping how tax authorities assess and respond to restructuring transactions. The discussion will examine the evolving landscape of tax risk, focusing on how authorities are deploying anti-avoidance rules and other enforcement tools to counter perceived abuses. Drawing on their deep experience with complex reorganization projects across the Asia Pacific region and beyond, our experts will provide practical guidance and share valuable insights into the strategic, legal, and operational considerations that underpin successful restructurings.

Moderator:



Kristine Mercado-Tamayo
Partner, Philippines
Quisumbing Torres

Speakers:



Dixon Hearder
Partner, Australia



Mubareke Mahemutu
Tax Advisor, China
Baker McKenzie FenXun



Calista Li
Senior Associate
Hong Kong



Corey Bass
Foreign Associate
Japan



Yvonne Beh
Partner, Malaysia
Wong & Partners



Jeremiah Soh
Principal, Singapore

12:00 pm – 1:00 pm

Breakout Session – Part 2B: Mitigating Tariff Risk in Asia Pacific: Strategies for Supply Chain Resilience

As United States tariff measures and retaliatory trade actions continue to reshape the global trade landscape, businesses across the Asia Pacific are reassessing their supply chain strategies to stay competitive. With enforcement against tariff evasion intensifying, United States authorities are also stepping up anti-circumvention efforts to target transshipment, mislabeling, and other perceived deceptive trade practices. In this session, our experts will examine the growing impact of United States-imposed tariffs, the implications of “deals” between the United States and key Asian jurisdictions, and the shifting dynamics of trade enforcement. We will explore how multinational companies are responding through tariff mitigation strategies and regional supply chain realignment. Drawing on real-world case studies and practical insights, our speakers will share how businesses can reduce exposure to tariff-related risks and build more resilient cross-border operations.

Moderator:



Panya Sittisakonsin
Partner, Thailand

Speakers:



Lionel Van Reet
Partner, Belgium



Tina Li
Associate, China
Baker McKenzie FenXun



Kana Itabashi
Partner, Japan



Jeff Sum
Senior Associate, Malaysia
Wong & Partners



Daniel Chou
Associate Partner, Taiwan



Melinda Phelan
Partner, United States
BVMN



Ngoc Trung Tran
Senior Regulatory Advisor
Vietnam, BVMN

Agenda – Day 1

Wednesday, 12 November 2025

1:00 pm – 2:15 pm

Lunch and Keynote Message



Scott Levine

Partner, United States

(Former Deputy Assistant Secretary for International Tax Affairs at the United States Department of Treasury)

2:15 pm – 3:15 pm

Breakout Session – Part 3A: Tax Litigation Across Asia Pacific: Key Rulings and What They Mean for Businesses

In this session, our experienced tax litigators will dive into some of the most consequential judicial decisions from across the Asia Pacific region and beyond over the past year. Our panel will unpack the cases and explain how they are shaping the tax landscape, and explore the broader implications for businesses operating in the region. The discussion will offer sharp, practical insights to help multinationals manage tax litigation risk and stay ahead of emerging regulatory shifts.

Moderator:



Jason Liang
Partner, Malaysia
Wong & Partners

Speakers:



Simone Bridges
Partner, Australia



Sanjiv Malhotra
Head of Tax Practice, India
Shardul Amarchand
Mangaldas & Co.



Iman Hindrajanto
Associate Partner,
Indonesia
HHP Law Firm



Yohei Ueno
Associate, Japan



Seonhye Kim
Senior Associate, Korea
Baker McKenzie KLP JV



Scott Frewing
Partner, United States

Agenda – Day 1

Wednesday, 12 November 2025

2:15 pm – 3:15 pm

Breakout Session – Part 3B: Navigating the Evolving VAT/GST Landscape in Asia Pacific

Effective indirect tax planning is essential for minimizing compliance risks, optimizing cash flow, and ensuring that businesses remain competitive in an increasingly complex global tax environment. We are increasingly seeing tax authorities focus on indirect taxes as a key area in their audits, highlighting the growing importance of proactive planning and compliance. In this session, our experts will examine the latest developments in indirect tax law, policy, and enforcement – focusing on key challenges arising from digital economy taxation, supply chain structuring, and cross-border service delivery, among others. We will also explore the growing adoption of e-invoicing and real-time reporting requirements, and how these are reshaping compliance expectations. With a focus on practical insights, our experts will discuss how to manage audit risks in a rapidly evolving tax regulatory environment.

Moderator:



Shih Hui Lee
Principal (Tax Advisor)
Singapore

Speakers:



Corey Bass
Foreign Associate
Japan



Yvonne Beh
Partner, Malaysia
Wong & Partners



Jan Snel
Partner, Netherlands



**Camila Jacinto-
Lagustan**
Partner, Philippines
Quisumbing Torres



Thanh Hoa Dao
Special Counsel,
Vietnam

3:15 pm – 3:30 pm

Coffee Break

Agenda – Day 1

Wednesday, 12 November 2025

3:30 pm – 4:45 pm

Plenary Session 2: Navigating Pillar Two: Implementation, Uncertainty, and Strategy

As the OECD's Pillar Two framework continues to gain traction, recent developments – such as the 20 January 2025 United States executive memorandum and the 28 June 2025 G7 joint statement on a “side-by-side” approach – are reshaping the global tax landscape. For multinational enterprises, the implications are significant and still evolving. This session will explore the ongoing implementation of Pillar Two across Asia Pacific and other key jurisdictions, including how countries are approaching safe harbors, domestic top-up taxes, and interactions with existing regimes. With the extent of United States alignment still uncertain and further developments expected, our panel of experts from Asia, the United States, and elsewhere will provide timely insights on managing compliance risks, anticipating enforcement trends, and aligning global tax strategies in a period of continued uncertainty.

Moderator:



Jaclyn Ho
Principal (Tax Advisor)
Singapore

Speakers:



Ryutaro Oka
Partner, Japan



Yeo Joon Yun
Advisor, Korea
Baker McKenzie KLP JV



Krystal Ng
Partner, Malaysia
Wong & Partners



Miles Humphrey
Principal Tax Advisor
United States



Scott Levine
Partner, United States



Thanh Vinh Nguyen
Partner, Vietnam
BVMN

4:50 pm – 5:50 pm

Plenary Session 3: Tariff Turbulence: Tax and Transfer Pricing Response

Tariffs are increasingly being used as a strategic tool to advance economic and political interests, particularly amid ongoing trade tensions. For multinational enterprises, these tariffs can lead to higher costs, potential double taxation issues, and difficulties in adhering to the arm's length principle. In this session, we will delve into the interdependencies and distinctions between tariffs, taxes, and transfer pricing. We will examine their impact on typical manufacturing and supply chain models, providing guidance on how to address these challenges effectively and minimize your potential exposure.

Moderator:



Allen Tan
APAC Chair, Tax Practice
Singapore

Speakers:



Thomas Brennan
Economist, Australia



Tina Li
Associate, China
Baker McKenzie FenXun



Akihiko Tsuda
Partner, Japan



Antonio Russo
Partner, Netherlands



Panya Sittisakonsin
Partner, Thailand



Stewart Lipeles
Partner, United States

Agenda – Day 1

Wednesday, 12 November 2025

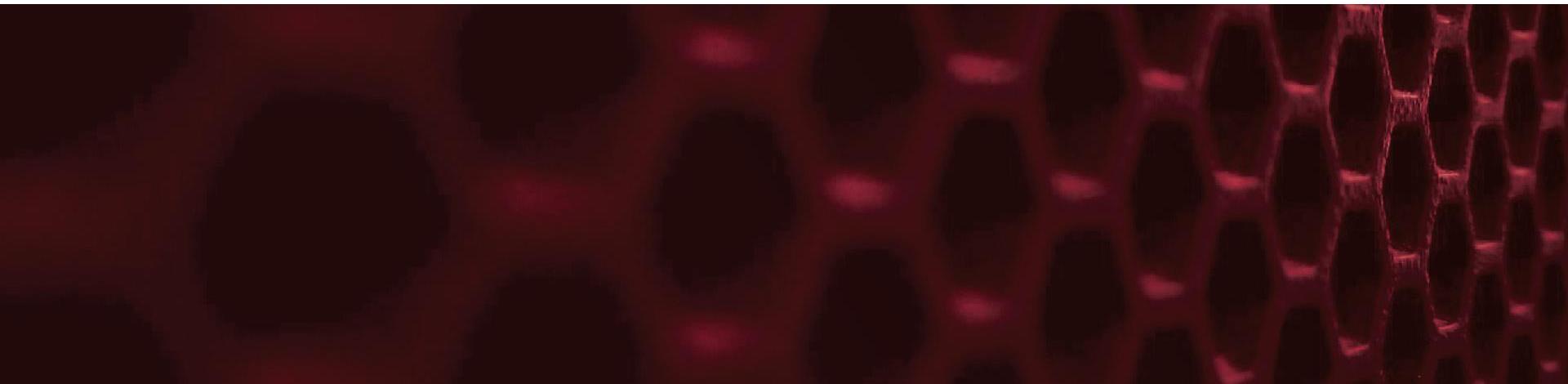
5:50 pm – 6:00 pm

Wrap up Day 1

6:00 pm onwards

Evening Reception

Dinner and drinks will be served. Includes a variety of tray-passed canapés and buffet offering cold appetizers, hot main dishes, and cold desserts.



Agenda – Day 2

Thursday, 13 November 2025

8:00 am – 9:00 am

Registration

9:00 am – 9:15 am

Opening Remarks

9:15 am – 10:30 am

Plenary Session 4: Asia Pacific Tax Updates – Part 2

In a time of geopolitical instability and macroeconomic uncertainty, Asia Pacific governments are under pressure to seek revenue wherever they can. Changes to tax laws and policies continue as governments attempt to protect or expand their tax base and improve tax collection. Companies need to stay agile and well-informed to navigate the increasingly complex landscape effectively. In this dynamic session, a highly experienced panel of tax practitioners will guide you through the latest and most significant tax trends and developments in the region, discussing their potential impact on businesses.

Moderator:



Dawn Quek
Principal, Singapore

Speakers:



Miles Hurst
Partner, Australia



Luis Zhang
Partner, China
Baker McKenzie FenXun



Kristine Anne Mercado-Tamayo
Partner, Philippines
Quisumbing Torres



Peggy Chiu
Partner, Taiwan



Sirirasi Gobpradit
Partner, Thailand

10:30 am – 10:45 am

Coffee Break

Agenda – Day 2

Thursday, 13 November 2025

10:45 am – 11:45 am

Breakout Session – Part 4A: Managing Tax and Transfer Pricing Audits and Controversy Challenges in Asia Pacific

In an uncertain world where governments are urgently seeking revenue from all possible sources, businesses are facing increasing levels of scrutiny from tax authorities. This session will examine the most critical developments and emerging trends in tax and transfer pricing audits and controversies across the region and beyond. We will provide updates on the focal points of tax authorities, their initiatives and behavioral insights. Additionally, we will share effective strategies based on our practical experience for handling tax audits and managing the risks associated with tax litigation. Through real-world examples, we aim to provide valuable insights to help businesses navigate this challenging landscape.

Moderator:



Ponti Partogi
Partner, Indonesia
HHP Law Firm

Speakers:



Jason Wen
Senior Tax Consulting
Director, China
Baker McKenzie FenXun



Shinichi Kobayashi
Partner, Japan



John Kwak
Partner, Korea
Baker McKenzie KLP JV



Jason Liang
Partner, Malaysia
Wong & Partners



**Camila Jacinto-
Lagustan**
Partner, Philippines
Quisumbing Torres



Jeremiah Soh
Principal, Singapore



Mark Delaney
Principal Tax Advisor
United Kingdom

10:45 am – 11:45 am

Breakout Session – Part 4B: From Tokyo to the World: Tax Strategies for International Investment

As Japanese businesses continue to expand across Asia and beyond, navigating the maze of international tax rules has never been more important – or more complex. In this fast-paced session, we will unpack the key tax considerations for outbound investments, from CFC rules and Pillar Two implications to cross-border mergers, redomiciliation, and regional tax incentives. Featuring expert insights from Asia, the United States, and Europe, our panel will examine how Japanese companies can structure their global expansion smartly, stay compliant across jurisdictions, spot opportunities, and tackle challenges in a shifting international landscape.

Moderator:



Ryutaro Oka
Partner, Japan

Speakers:



Guillaume Le Camus
Partner, France



Sanjiv Malhotra
Head of Tax Practice, India
Shardul Amarchand
Mangaldas & Co.



Akihiro Kawasaki
Partner, Japan



Anilynn Ng
Senior Associate
Malaysia
Wong & Partners



Daniel Chou
Associate Partner
Taiwan



Sirirasi Gobpradit
Partner, Thailand



Julia Ushakova-Stein
Partner
United States



Thanh Hoa Dao
Special Counsel
Vietnam

Agenda – Day 2

Thursday, 13 November 2025

11:45 pm – 12:30 pm

Keynote Message



Gary Sprague
Partner, United States



Stewart Lipeles
Partner, United States



Scott Levine
Partner, United States
(Former Deputy Assistant Secretary for International Tax Affairs
at the United States Department of Treasury)

12:30 pm – 12:45 pm

Closing Remarks

12:45 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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