From: <u>imc-event@imcnet.org</u>
To: <u>avinashdalal@hotmail.com</u>

Subject: Seminar on Law & Procedure Relating to AAR Controversies - Friday, July 17, 2015 at

2.30 pm in IMC

Date: Fri, 3 Jul 2015 04:37:18 -0700

July 3, 2015

Dear Sir/Madam,

Half Day Seminar on 'Law & Procedure Relating to Authority for Advance Ruling & Recent Controversies' (Jointly organized by Indian Merchants Chamber, Bombay Chartered Accountants Society, The Chamber of Tax Consultants and IFA-India Branch)

With the growing international trade, certainty regarding the tax liability and consequences of international transactions is of immense importance to the MNCs as well as the Indian Corporate dealing with them.

With the view to enlighten tax professionals as well as representatives of industry regarding the Law & Procedure Relating to Authority for Advance Ruling & Recent Controversies under the Income-tax Act , the Indian Merchant's Chamber (through Direct Taxation Committee) jointly with Bombay Chartered Accountants Society, The Chamber of Tax Consultants and IFA-India Branch have organized a half day Seminar. Details are as under:

Hon'ble Mr. Justice V. S. Sirpurkar, Chairman, Authority for Advance Rulings has graciously agreed to give the Keynote Address.

Topics to be covered at the Seminar:

Session I

Panel discussion on Alternative Dispute Resolution – Enhanced role of AAR going forward including specific issues relating to domestic transactions that can be pursued before the AAR.

Session II

Panel discussion on Availability of benefit of tax treaties; limitation of benefits clause; and tax avoidance, etc.

Session III

Panel discussion on Tax issues arising from transfer of shares, business restructuring (including issues related to indirect transfers) and applicability of MAT provisions to foreign companies. Details of the Seminar are:

Date & Time	Friday, July 17, 2015 from 2.30 pm to 7.30 pm
Venue	Walchand Hirachand Hall (4th Floor), IMC, Mumbai
Registration Fees:	Rs.1,000/- plus 14% ST (For IMC Members)

Rs.1,250/- plus 14% ST (For Non-Members) (This includes the cost of Background material
Tea / Coffee, and refreshment, etc.)

Who should attend:

This seminar will provide a good opportunity to CEOs, CFOs, Senior Executives handling Finance and Tax functions, Advocates, Chartered Accountants and Tax Professionals to hear from the experts on the subject and interact with them on various technical and procedural aspects of the subject.

Terms of Admission:

A limited number of participants will be admitted on first-come first-served basis. Please register your participation at the earliest by filling up the enclosed Registration Form and forward the same to IMC by email: upendra@imcnet.org or by post along with cash/DD/ Cheque for applicable amount in favor of 'Indian Merchants' Chamber'. With regards,

Arvind Pradhan

Director-General