



Taxation Society

Masterclass on UAE CORPORATE TAX & TRANSFER PRICING



Speakers for 11th June



CA Nilesh Ashar
Senior Managing Director
FTI Consulting

Topic : Corporate Structures and Tax Grouping provisions along with Group Reliefs



Mr. Shiraz Khan
Partner - Head of Taxation
Al Tamimi & Co

Topic : Salient features of the CT Law and International Tax aspects of CT Law



CA Janak Panjuani
Director

**Putran Chartered Accountants
Topic : Computation of Taxable Income, Expense Deductions and Management Remuneration**

Speakers for 18th June



CA Mithilesh Reddy
Founder & CEO
SBC Tax Consulting LLC

Topic : International Transactions – TP – Treaty Application – Practice and Impact



CA Manish Arora
Regional Tax Manager
Schneider Electric
Middle East & Africa

Topic : Benchmarking Methods – What to Apply and When. Sample Case Study



Dr. Tirupathi Parthasarathy Anand (TP)
Chief Strategist

**Leap Business Excellence Advisory FZE
Topic : Corporate Tax - Free Zone and It's Implications**

100
LIMITED SEATS

FIRST COME FIRST SERVE !!!

**SCAN ME
FOR 1 DAY WORKSHOP**



**SCAN ME
FOR 2 DAY WORKSHOP**



**Sunday, 11th & 18th, June 2023
9:30 AM to 4:00 PM**



**Crystal Ballroom, India Club,
Oud Metha, Dubai, UAE**

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Taxation Society

Masterclass on

UAE CORPORATE TAX

&

TRANSFER PRICING

The Committee of Taxation Society takes great pleasure in inviting you for the Masterclass on "UAE Corporate Tax & Transfer Pricing."

This event will take place on Sunday, 11th & 18th June 2023 from 9:30 AM to 4:00 PM at Crystal Ballroom - India Club, Oud Metha, Dubai, UAE

CORE COMMITTEE

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| AGENDA | |
|---------------------|---|
| Day and Date | DAY 01 - Sunday, 11th, June 2023 |
| 09:30 to 10:00 AM | Registration & Breakfast |
| 10:00 to 10:05 AM | Welcome Address by CA. Nimish Makvana President Taxation Society |
| 10:05 to 10:10 AM | Chairman's Address by CA. Naveen Sharma Chairman Taxation Society |
| 10:10 to 12:00 PM | Guest Speaker CA Janak Panjuani Director - Puthran Chartered Accountants Topic : Computation of Taxable Income, Expense Deductions and Management Remuneration |
| 12:00 to 12:30 PM | Tea / Coffee Break |
| 12:30 to 2:00 PM | Guest Speaker Mr. Shiraz Khan Partner - Head of Taxation - Al Tamimi & Co Topic : Salient features of the CT Law and International Tax aspects of CT Law |
| 2:00 to 2:45 PM | Lunch |
| 2:45 to 4:00 PM | Guest Speaker CA Nilesh Ashar Senior Managing Director - FTI Consulting Topic : Corporate Structures and Tax Grouping provisions along with Group Reliefs |
| Day and Date | DAY 02 - Sunday, 18th, June 2023 |
| 09:30 to 10:00 AM | Registration & Breakfast |
| 10:00 to 10:05 AM | Welcome Address by CA. Nimish Makvana President - Taxation Society |
| 10:05 to 10:10 AM | Chairman's Address by CA. Naveen Sharma Chairman - Taxation Society |
| 10:10 to 10:40 PM | Tea / Coffee Break |
| 10:40 to 12:10 PM | Guest Speaker CA Mithilesh Reddy Founder & CEO - SBC Tax Consulting LLC Topic : International Transactions – TP – Treaty Application – Practice and Impact |
| 12:10 to 12:55 PM | Lunch |
| 12:55 to 2:25 PM | Guest Speaker CA Manish Arora Regional Tax Manager - Schneider Electric Middle East & Africa Topic : Benchmarking Methods – What to Apply and When. Sample Case Study |
| 2:25 to 4:00 PM | Guest Speaker Dr. Tirupathi Parthasarathy Anand (TP) Chief Strategist - Leap Business Excellence Advisory FZE Topic : Corporate Tax - Free Zone and It's Implications |



Sunday, 11th & 18th, June 2023
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Taxation Society

Masterclass on UAE CORPORATE TAX & TRANSFER PRICING

Speaker



CA Nilesh Ashar
Senior Managing Director
FTI Consulting

Nilesh has more than 25 years of international, corporate and M&A tax experience advising clients across the Middle East, India, UK and Europe.

Nilesh Ashar is an international tax and corporate tax specialist, bringing more than 25 years of tax experience. Mr. Ashar has advised clients on complex tax engagements in sectors such as real estate, financial services, private equity, oil and gas, retail and family offices across the Middle East, India, the UK and Europe.

Mr. Ashar has been based in Dubai since 2012, following stints in India and London. He brings a range of tax experience to FTI Consulting's clients, including advisory services focused on corporate and international tax matters, cross-border tax structuring, M&A tax, economic substance, tax governance, transfer pricing and VAT.

He has extensively advised GCC Family Groups and multinational enterprises ("MNEs") on tax structuring and tax optimization initiatives, including advising them on developing their tax governance frameworks as well as managing their regional and global tax compliances.

Mr. Ashar also brings a wealth of experience in helping organisations and regulatory authorities identify and manage tax risks, particularly in the context of evolving tax legislations in the Middle East, including advising on their effective tax rates and improving their tax processes in the ever-evolving business and transactional environment. More recently, in the United Arab Emirates ("UAE"), Mr. Ashar led UAE corporate tax assessments for large UAE-headquartered groups and advised and advised clients on the impact of the UAE corporate tax on their operational structure and transfer pricing policies..

Prior to joining FTI Consulting, Mr. Ashar spent time with multiple Big Four firms, during which he set up the India Tax Desk in London and led the UAE international tax practice for a boutique firm. . Additionally, Mr. Ashar is a regular speaker at seminars, conferences, client workshops and various industry forums and has contributed to many thought leadership pieces in the tax arena.

Relevant Experience

- Advised Established UAE cloud kitchen's acquisition of a UAE/Kingdom of Saudi Arabia-based restaurant group
- Advised on a global private equity ("PE") firm's acquisition of a visa processing group
- Advised a UAE-headquartered global logistics player's acquisitions in Australia and the United States
- Advised on a global PE firm's acquisition of a large healthcare group in India and Middle East
- Advised on a pre-IPO diligence and structuring of hotels and energy companies
- Led the tax due diligence and structuring for two proposed carve outs in the energy and utilities sector.

Education

B.Com, H.R. College of Commerce and Economics

Associations

Member of the Institute of Chartered Accountants of India

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Speaker



Mr. Shiraz Khan
Partner - Head of Taxation
Al Tamimi & Co

Shiraz is a UK qualified lawyer with over 21 years of international tax experience. Prior to joining Al Tamimi & Company, he was the global head of tax at a leading multinational where he was responsible for the tax affairs in over 100 countries. He has also worked for a top international law firm in the UK and big 4 firms in both the UK and the Middle East.

Shiraz specialises in advising on international tax structuring and tax aspects of cross border M&A, private equity, structured finance, Islamic finance and real estate transactions. He has in-depth knowledge and expertise across all taxes including corporate tax, withholding taxes and VAT in a wide range of industry sectors. He has particular expertise in advising multinational corporations on structuring their investments and operations into the region and financial institutions, sovereign wealth funds, real estate investment companies, family offices and private equity groups based in the region on their international investments.

Shiraz regularly speaks at conferences and seminars on international tax issues and has been involved in advising governments on the drafting of tax laws.

Recent Experience

- Tax advice for a **global media group** based in the Middle East in connection with their international operations across Europe, Middle East, Africa, America and Asia regions.
- Structuring of various investments totaling USD1.5bn across Europe and the United States for a **global real estate fund**, including advising on tax efficient profit repatriation and exit as well as the tax considerations related to the financing structure.
- Advised a **private equity firm** on a EUR2bn pan-European acquisition of a large engineering group including debt push-down at investment level.
- Tax due diligence, structuring and sale and purchase documentation support for a **Gulf bank** in respect of an acquisition of a banking group in 13 countries across the Middle East and Asia.
- Advised a **sovereign wealth fund** on various debt and equity investments into the United States.
- Provided tax advice to a **Shariah compliant bank based** in the Gulf region in connection with the issue of a USD750m ijara backed sukuk.
- Advised a **regional retail organisation** on the tax implications of expanding its operations in the Middle East.
- Advised an **international airline** on the tax implications of a cross-border sale of an aircraft and advised private charter entities and individuals on aircraft and aviation-related sales.
- Assisting a **leading Korean construction company** with one of the first MAP requests in the GCC region
- Advised **one of the world's largest multinational technology companies** in connection with activities in Kuwait as well as assistance in dealings with the Kuwaiti Department of Income Tax
- Advised a **large multinational corporation** on the tax aspects including retention tax issues with respect to its business operations in Kuwait
- Tax advice for a **global media group** based in the Middle East in connection with their international operations across Europe, Middle East, Africa, America and Asia regions.

Languages

- English

Education

2001 – Bachelor of Laws, LLB, King's College

Admission

2002 – Professional Bar Qualification, Inns of Court School of Law, UK

Practices

- Tax
- Corporate / Mergers and Acquisitions
- Family Business

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Speaker



CA Janak Panjuani
Director
Puthran Chartered Accountants

CA Janak Panjuani is a qualified Chartered Accountant (ICAI), who has been in Dubai for the past 30 years. Currently, he is a Director in Puthran Chartered Accountants, Dubai (since the year 2000). CA Janak possesses knowledge, technical skills and professional know-how in the field of Auditing, Corporate Tax (CT), Value Added Tax (VAT), Economic Substance Regulation (ESR), Transfer Pricing and International Taxation. He has a keen understanding of subtle aspects of International Financial Reporting Standards (IFRS). CA Janak has served as – Treasurer of Indian Business Professional Council (IBPC) Dubai; Committee Member of Dubai Chapter of ICAI; Office bearer of various committees of Bombay Chartered Accountants Society (BCAS); Joint Convener of Study Circle Committee of the Chapter and also as the Election Office of Dubai Chapter of ICAI. CA Janak has been a speaker at many professional conferences and has written articles in professional journals as well.

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Speaker



CA Mithilesh Reddy
Founder & CEO
SBC Tax Consulting LLC

Mithilesh has over 15 years of experience in management and consultancy, assisting clients with transfer pricing, structuring, regulatory matters, tax advisory, and litigation. He is a transfer pricing specialist, advising multinational clients on three-tier documentation, transfer pricing litigation support and representations, structuring of complex inter-company transactions, alternate dispute resolutions (including APA, MAP, and Safe Harbour), BEPS advisory, and valuations for arm's length determination for TP purposes. Mithilesh has worked with a vast clientele engaged in manufacturing, distribution, and services activities across a wide spectrum of industries, including technology, pharma and healthcare, industrial, real estate, financial services, and consumer.

Mithilesh is the Founder and CEO of SBC Tax Consulting LLC, a boutique tax consulting firm providing specialized transfer pricing, structuring, international tax, BEPS, and corporate tax advisory services. SBC's head office is based in Dubai, catering to the Middle East region and GCC, and also has a presence across India and the US, with a current team of over 250 people.

Previously associated with a Big 4 firm in transfer pricing and international taxation domain, Mithilesh is a key resource person of the Institute of Chartered Accountants of India (ICAI) for international taxation and transfer pricing matters, and also a special invitee member of the Direct Tax Committee (including International Taxation) of ICAI. Mithilesh has been a regular contributor for various forums and associations by contributing articles, participating and moderating training sessions and webinars on UAE Corporate Tax & Transfer Pricing.

Mithilesh took Transfer Pricing sessions as a guest faculty for Certificate Course on UAE Corporate Tax in Dubai and Abu Dhabi branches of ICAI. Mithilesh also presented on the topic "UAE Transfer Pricing Documentation & Compliances" at the 2nd UAE Corporate Tax Forum at Dubai. Mithilesh has contributed to transfer pricing related chapters of the background material & guidance note on UAE Corporate Tax & Transfer Pricing that is being developed by ICAI for the benefit and guidance of UAE businesses & professionals.

Recently, Mithilesh was awarded the "Times 40 under 40 - Brightest Young Entrepreneur Award 2022" and was invited by TEDx as a speaker at the TEDx Kalbadevi event in Mumbai."

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Speaker



CA Manish Arora
Regional Tax Manager
Schneider Electric - Middle East & Africa

Manish Arora, Chartered Accountant with 11+ years of post-qualification experience in Direct and Indirect Taxation, especially Transfer Pricing and International Taxation with a rich pre-qualification experience in Tax and Audit. Also holds Diploma in International taxation and Transfer pricing, issued by ICAI, India.

He is currently working as Regional Tax Managers with Schneider Electric covering Middle East and Africa. Prior to moving to Dubai he was associated with Schneider Electric India and handling Corporate Tax and Transfer pricing matters with more emphasis on International taxation same as in his current role in Dubai.

Manish is taking care of TP compliances of all cross border as well as domestic related party transactions including strategizing on segmentation and tested party considering the Benchmarking.

He is advising internal business partners on international trade transactions with respects to taxation impact especially Transfer pricing, FAR analysis and local tax practices. Manish is involved in the Group level study of BEPS action points and potential impact on the company and have prepared SOPs on various Intra-group transactions to ensure compliances from tax and TP perspective.

Manish has represented before Tax and TP authorities and successfully closed the Transfer Pricing Audit (in India) on the receipt and need test for Management Support Fees. He is a regular speaker on tax and transfer pricing seminars at various platforms.

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Speaker



Dr. Tirupathi Parthasarathy Anand (TP)
Chief Strategist
Leap Business Excellence Advisory FZE

TP is a Doctor of Business Administration (PhD) and a Chartered Accountant (Indian CA) with over 35 years of post-qualification experience having worked in India, Singapore and Dubai. He holds a Bachelor of Commerce degree and is also an alumnus of the Indian Institute of Management, Ahmedabad, India where he underwent an 8 months course on “General Management Program” in 2012. He has attended a residential program of Harvard Business School on “Building a Global Enterprise” in April 2015. In August 2017 he has successfully completed a two month ‘Online Course’ on “Design Thinking” from MIT Sloan School of Management, MIT, Massachusetts, U.S.A. TP has been certified in September 2018 by StratX Simulations to conduct the “Blue Ocean Strategy Simulation”.

TP helps his clients with Strategic Planning Process, Business Process Mapping, Corporate Strategy, Strategic Alliances, Design Thinking and Business Excellence. With hands-on experience in various functional areas, he provides the Corporate Strategy best suited for the Organisation. TP believes that every organisation should set themselves up in the ‘path of excellence’ which is a continuous journey.

TP is a keen researcher and his research interests are Small Business Growth, Entrepreneurship, and Innovation with special focus on the Small and Medium Enterprises Sector. He has published several papers in leading Journals and International Conferences.

TP is a visiting faculty at The Institute of Chartered Accountants of India, Emirates Institute for Banking and Financial Studies, Etisalat Academy and SP Jain School of Global Management. TP has written a few chapters of the Background Material on UAE VAT Law which was published by the Institute of Chartered Accountants of India. He is also the lead faculty for the Certificate Course on VAT Law in UAE and Certificate Course on IFRS being conducted by the Institute of Chartered Accountants of India, Dubai Office.

TP is also Team Leader/Senior Assessor for various Excellence Award programmes in the UAE. He is also member of the Panel of Judges for American Business Awards (Stevie Awards) in the USA since 2015.

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