



The No.1 Event for Tax Professionals

THAI TAX SUMMIT 2011

DAY ONE WEDNESDAY, 19 JANUARY 2011

MAIN PLENARY SESSIONS

Update on latest tax and changes in tax policy at both national and international levels. Examine the regulatory pressures from the changing global/region's economic landscape on businesses, and address tax strategies, crucial issues and opportunities for companies in delivering significant tax saving and minimizing tax risk.

8:00 Registration & Morning Coffee

8.50 Chairperson's Opening Address

Hatasakdi Na Pombejra
Partner & Managing Director
HNP Counsellors Ltd - Taxand Thailand

Hatasakdi Na Pombejra began his career with Baker & McKenzie in 1983 and became an international partner in 1992. In early 2002, he set up his own law firm known as HNP Counsellors - Taxand Thailand. He has expanded his practice to provide a one-stop service to domestic and multinational clients across industry sectors delivering a wide full advisory services covering legal, tax, indirect tax, business & financial advisory, corporate income tax. He is also a member of the Thai Bar Association and the Lawyers Council and a Fellow member of the Institute of Thai Directors in conjunction with the Australian Institute of Company Directors.

9:00-10:00

KEYNOTE ADDRESS

LATEST UPDATES AND DIRECTIONS OF BOI INVESTMENT PROMOTION AND TAX INCENTIVES

- Updates on BOI tax privileges and promotion tax incentives
- BOI investment initiatives and policies
- Tax incentive plans for targeted industries
- How to adopt tax rules and future direction

Atchaka Sibunruang, Ph.D.
Secretary General
Thailand Board of Investment (BOI)

Atchaka Sibunruang - Secretary General, Thailand Board of Investment, joined BOI since 1984. Dr.Sibunruang graduated from Chulalongkorn University with Bachelor in Economics (First class honours), Master and Doctor degree in Economics from University of Sussex, U.K. She consults to various International Agencies including the World Bank, United Nations Conference on Trade and Development and Foreign Investment Advisory Service. She is also a lecturer at several universities in Thailand.

10:00 Morning Refreshments & Networking

10:15-11:00

UPDATE ON TAX LAWS AND RULES IN THAILAND & DIRECTIONS BEYOND 2011

- Macro view on tax policy and directions for 2011
- Important tax rules and changes
- How to effectively deal with changes
- Tax implications for corporate/investors

Picharn Sukparangsee
Partner
Siam City Law Offices Ltd

11:00-12:00

KEY ISSUES ON CUSTOMS AND INTERNATIONAL TRADE

- Planning issues for customs and international trade
- New customs rules and regulations
- Customs duty privileges under FTAs
- Implementing of a FTA between Thailand and other countries
- Impact from FTA in Thailand and global

Malika Bhumivarn
Managing Director
Bryan Cave International Trade (Thailand) Ltd

12:00 Luncheon

BREAKOUT ROOM:

PARALLEL SESSIONS : STREAM A & B & C

STREAM A: TAXATION FOR MERGERS & ACQUISITIONS

Sessions Moderator:

Watcharas Leelawath, Ph.D.
Deputy Executive Director
International Institute for Trade and Development (ITD)

1:15-2:15

TAXATION OF CROSS-BORDER MERGERS AND ACQUISITIONS

- Role of debt in M&A financing and current trends
- Potential holes in the application of Thailand's participation exemption
- Consideration of the tax implications in respect of asset versus share acquisitions
- Treaty shopping and changing views in respect of intermediate holding companies
- The importance of tax assumptions in valuation models

Andy Ellis, Associate Director
KPMG Phoomchai Tax Ltd

2:15-3:00

MAXIMIZING TAX VALUE FROM CORPORATE TRANSACTIONS AND REDUCING TAX RISK IN M&A

- Key issues in M&A and the M&A process
- Identifying and evaluating tax risks in M&A
- The due diligence process
- Managing risk through deal structuring
- Deal documentation

Paul B A Stitt
Partner, Tax and Legal Services
PricewaterhouseCoopers Legal & Tax Consultants Ltd

STREAM B: TRANSFER PRICING

Sessions Moderator:

Robert Feinschreiber
International Tax Practitioner & Advisor
Transfer Pricing Consortium, USA

1:15-2:15

FUTURE AND KEY ISSUES OF TRANSFER PRICING IN THAILAND

- Update on transfer pricing regime in Thailand
- International rules on transfer pricing
- Implementing transfer pricing in your organization
- Application of Thai revenue code

Benjamas Kullakattimas
Tax Partner and Head of Transfer Pricing Services
KPMG Phoomchai Business Advisory Ltd

2:15-3:00

KEY CONSIDERATIONS IN TRANSFER PRICING DOCUMENTATION TOOLS AND COMPLIANCE

- Understanding information required by Paw113
- Characteristics of transfer pricing documentation
- Risk based approach to transfer pricing documentation
- Pricing policy
- Management of documentation for global businesses
- APA documentation requirements

Stuart Simons, Tax Partner
Deloitte Touche Tohmatsu Jaiyos Advisory Co., Ltd

STREAM C: CORPORATE TAX PLANNING

Sessions Moderator:

Picharn Sukparangsee
Partner
Siam City Law Offices Ltd

1:15-2:15

KEY CORPORATE TAX PLANNING CONSIDERATIONS

- Key elements and advantages of effective corporate tax planning
- Opportunities available in implementing tax planning strategies
- Understanding terms of tax evasion and avoidance
- Managing tax risk

John T Cifor
Tax & Legal Services Partner
Deloitte Touche Tohmatsu Jaiyos Advisory Co., Ltd

2:15-3:00

EXPLORING RISKS INVOLVED IN CORPORATE TAX PLANNING AND HOW TO MINIMIZE THEM

- Corporate income tax regulatory and compliance
- Determining a suitable tax risk policy in corporate situation
- Deciding what level of risk is acceptable
- Managing withholding tax exposure

Picharn Sukparangsee
Partner
Siam City Law Offices Ltd