ASEAN Tax/Thai Tax Summit 2015

Opportunities & Challenges from Tax Changes for Outbound & Inbound Investment

Keep abreast of the latest tax issues and policies in Thailand & key AEC countries to enhance competitiveness and manage tax risks for AEC integration

Keynote Address by:
Dr. Warotai Kosolpisitkul
Director, Tax Policy Bureau
Fiscal Policy Office, Ministry of Finance

- Hear outstanding case study on "Cross-border transactions & tax risk management"
- Tax updates/discussions toward AEC integration in 2015
- Gathering Thailand’s tax authorities and top tax experts
- Find out the latest tax developments in countries such as Cambodia, Laos, Myanmar, Vietnam and Indonesia
- Executive roundtable discussion on “Emerging taxation issues for ASEAN countries and impacts of regional integration on taxation” by Loyens & Loeff, KhattarWong LLP, BDO Advisory Ltd and Vovan & Associes
- Executive Networking Opportunities

Conference Highlights:

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SAVE 2,000 THB
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Additional 10% Discount for Group of 3 or more!
Day One: Thursday, 25 June 2015

8:00 am Registration & Morning Coffee

8:45 am Chairperson’s Opening Address

Dr. Roland Amoussou-Guenou
Partner
Vovan & Associes

Dr. Roland Amoussou-Guenou is a Partner at Vovan & Associes and lecturer at various institutes and universities in Thailand. He has more than 10 years of professional experience in Asia. He specializes in International law, International arbitration and ADR, Intellectual property law, Public private partnerships (PPPs), Contract management, Mergers and acquisitions, Construction law, Energy law and tax management. He also has a worldwide experience in corporate and professional training programs, especially for IDLO, AIT, UNITAR, the United Nations, the World Bank and ABD. Dr. Roland is an arbitrator of the ICC and served as President of an international arbitration tribunal (UNCITRAL).

9:00-10:00 am

KEYNOTE ADDRESS

UPDATE ON TAX LAWS AND RULES IN THAILAND & DIRECTIONS BEYOND 2015 AND AEC INTEGRATION

Dr. Warotai Kosolpisitkul
Director, Tax Policy Bureau
Fiscal Policy Office, Ministry of Finance

Dr. Warotai Kosolpisitkul is Director - Tax Policy Bureau at Fiscal Policy Office, Ministry of Finance. He was Senior Expert on Savings, Investment and Capital Market Development, Chief of Staff, Office of Deputy Minister of Commerce, Director at MOF, Senior Advisor to Executive Director at The World Bank, Columnist at Manager Newspaper, and Senior Researcher: Siam Development Institute. He holds Ph.D. in Economics and Social Science from University of Innsbruck, M.A. in Economics from Memphis State University and Bachelor of Economics from Chulalongkorn University.

12:15 pm Luncheon

1:30-2:45 pm

EXECUTIVE ROUNDTABLE DISCUSSION

EMERGING TAXATION ISSUES FOR ASEAN COUNTRIES AND IMPACTS OF REGIONAL INTEGRATION ON TAXATION

Moderator:

Dr. Roland Amoussou-Guenou
Partner
Vovan & Associes

Panelists:

Rogier Ploeg
Tax Adviser
Loyens & Loeff

10:00 am Morning Refreshments & Networking

10:15-11:15 am

LATEST UPDATES AND DIRECTIONS OF BOI INVESTMENT PROMOTION AND TAX INCENTIVES FOR ENHANCING INVESTMENT

Narit Therdsteerasukdi
Executive Director
Investment Strategy and Policy Bureau
Thailand Board of Investment

Narit Therdsteerasukdi is Executive Director at Office of the Board of Investment. He joined BOI since 2004. He was Chief Secretariat, Economic Advisory Committee to the Prime Minister, Deputy Director at OTOP, and Executive Assistant to Vice Minister and Advisor to the Deputy Prime Minister. He holds M.A. of Economics from Boston University, B.Ec. (Honors) from Chulalongkorn University and LL.B. from Ramkhamhaeng University.
Clint O’Connell is a senior tax adviser with Loyens & Loeff. He advises on international tax structuring, M&A and structured finance. Among his clients are multinationals in the energy, real estate and technology sectors, banks and investment funds. Rogier is currently working from the Loyens & Loeff Singapore office and was previously based in the Amsterdam office. Loyens & Loeff is an independent internationally oriented tax/corporate law firm. Over 1500 people work for the firm, including 850 lawyers, tax advisers and notaries. The main offices are based in the Netherlands, Luxembourg, Belgium and Switzerland. In addition, the firm has 12 foreign offices in the main global financial centres.

Chua Yee Hoong is a partner of Singapore law firm KhattarWong LLP. She advises on the tax implications of commercial activities, group reorganizations, business and asset acquisitions, employee remuneration schemes, the application of tax treaties and tax residence requirements. She also represents companies and individuals in challenging the revenue authority’s tax assessments, reducing tax assessed and obtaining favourable tax refund or outcome for clients. She also acts for clients in applying for grant of representation in the Singapore courts and in the administration of estates.

Paul Ashburn is Co-Managing Partner of BDO Advisory Limited, a leading provider of tax services to international clients in Thailand and the Asia Pacific region, based in Bangkok. He has over 28 years of experience in tax consulting, including more than seventeen years in Thailand. His expertise includes M&A transactions, international tax planning and the development of tax effective structures for cross border transactions. His industry experience includes property development, international logistics, financial services, manufacturing, telecommunications, and publishing.

Jack Sheehan is a Partner and Head of regional tax practice group at DFDL. Jack specializes in providing international tax planning, cross border structuring, M&A and general tax advisory. He is advising clients in sectors ranging from telecommunications, mining, oil & gas, manufacturing, aviation, banking and financial institutions to Government and aid-funded projects. Jack is a member of the tax treaties editorial board for Bloomberg International, he is the IBFD country correspondent for Myanmar, Cambodia and Laos, he is a member of the IFA and is a regular speaker and writer on international tax.

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Clint O’Connell has over 12 years of experience, of which over six years have been in Cambodia. His work focuses on corporate M&A, and tax and corporate structuring. He’s been involved in some of the largest private transactions in Cambodia, most notably, the merger of Axista and Smart Mobile. Clint is a lecturer for the popular CamEd course “Tax in Cambodia” and is the senior editor of the comprehensive textbook Tax in Cambodia, the most complete tax guide with respect to Cambodia, which is used as the standard textbook by CamEd students. He advises a wide range of clients, from large globally-listed companies to small- and medium-sized businesses.

Rogier Ploeg is a senior tax adviser with Loyens & Loeff. He advises on international tax structuring, M&A and structured finance. Among his clients are multinationals in the energy, real estate and technology sectors, banks and investment funds. Rogier is currently working from the Loyens & Loeff Singapore office and was previously based in the Amsterdam office. Loyens & Loeff is an independent internationally oriented tax/corporate law firm. Over 1500 people work for the firm, including 850 lawyers, tax advisers and notaries. The main offices are based in the Netherlands, Luxembourg, Belgium and Switzerland. In addition, the firm has 12 foreign offices in the main global financial centres.

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Opportunities & Challenges from Tax Changes for Outbound & Inbound Investment

10:30-11:30 am
LATEST TAX ISSUES AND PRACTICAL ASPECTS FOR SUCCESSFUL INVESTMENT IN MYANMAR
- Latest on Myanmar’s economic reform and rapid opening
- Myanmar tax updates (before/after)
- Key issues and key considerations for recent Myanmar tax updates
- Tax treaty planning update
- Permanent establishment, withholding taxes when doing business with Myanmar without a local entity
- Case studies on tax issues

Ola Nicolai Borge
Partner
Baker & McKenzie Myanmar

Ola Nicolai Borge is a Norwegian lawyer with extensive international experience as legal and tax advisor, practicing for 15 years with structuring of transactions and investment projects. His work experience includes working in international law firms and global financial advisory firms, covering positions in Europe, the US and South-East Asia. During the last five years Ola has been based in various countries in South-East Asia, with the last three years in Myanmar.

11:30 am-12:30 pm
KEY CORPORATE TAX PLANNING CONSIDERATIONS AND STRATEGIES IN CAMBODIA, LAOS AND VIETNAM
- Updates on recent changes in corporate income tax - Cambodia, Lao PDR and Vietnam
- Latest foreign investment law
- Key features of existing transfer pricing regulatory regime
- Identifying critical factors to mitigate tax pitfalls in corporate transactions
- Individual income tax treatment of employees, resident and non-residents and expatriates

Jack Sheehan
Partner and Head of Regional Tax Practice Group
DFDL Legal and Tax

12:30 pm Luncheon

1:45-2:45 pm
INDONESIA – TAX INCENTIVES AND INVESTMENT
- Latest on Indonesia’s taxation systems and policies
- DTA update on tax planning for international investors
- Tax incentives to create a better investment in Indonesia
- Key challenges in applying tax treaty in Indonesia
- Managing and minimize tax risks to avoid mistakes

Ratna Febrina
Tax Partner
SF Consulting

Ratna Febrina is a Certified Tax Attorney, Tax Consultant and obtained a Brevet C – the highest working license qualification. She is also a certified Customs Consultant. Throughout her tax consultancy career, Ratna has served major multinational and national companies in various business sectors such as trading, manufacturing, telecommunication, mining and banking. With this experience, she has grown accustomed to dealing with different types of clients and providing effective, practical solutions. Her specialty is in matters regarding to dispute resolution such as tax audits, objections and appeals.

2:45-3:45pm
PRACTICAL CORPORATE TAX PLANNING STRATEGIES
- Key issues and advantages of effective corporate tax planning
- Key considerations for mitigating tax pitfalls in corporate transactions
- Opportunities available in implementing tax planning strategies
- Assessing the risks associated with companies’ tax practices

Chakkree Soithong
Head of Accounting and Shared Services
Siam City Cement Public Co., Ltd.

Chakkree Soithong has been working over 20 years with accounting, auditing, and taxation experience. A Thai certified public accountant, a Notarial Public Attorney and a lawyer. Prior to joining the tax team, he led a large team of accountants, developing and implementing accounting and costing systems, identifying financial risks and providing comments and recommendations at management level. He also has strong audit experience, including regular statutory audits, internal audit as well as due diligence and other special work.

3:45 pm Afternoon Networking Coffee Break

4:00-5:15 pm
INSIGHTS INTO THE WORKINGS OF THE GENERAL ANTI-AVOIDANCE RULE
- New anti-avoidance rules around ASEAN and how they affect tax planning
- Anti-avoidance principles - Evolution
- Assessing and comparing the recent trends in the area of GAARs
- Key lesson learned and case examples

Dr. Net Le
Partner
LNT & Partners

Dr. Net Le heads the firm’s Infrastructure and Financial Services practice group, which is renowned for its capacity to tackle complex assignments. His deals have been widely regarded and contributed to the Firm’s title Deal Firm of the Year by ALB Thomson Reuters. His signatory transactions include major ODA infrastructure projects, complex ICC arbitrations, oil refinery, and Tax. Dr. Le has been selected as a leading lawyer in the fields of project finance, international arbitration, and infrastructure by IFLR1000, Legal 500 and Chambers Global since 2009. In 2012, Dr. Le was awarded the title of “Lawyer of the Year” by Vietnam’s Ministry of Justice. Prior co-founding LNT & Partners, Net worked with Baker & McKenzie and Clifford Chance.

5:15 pm Chairperson’s Closing Remarks and End of the Conference
Dear Executive,

2015 is a very important year for the ASEAN countries as we realize the establishment of the ASEAN Economic Community (AEC). This is crucial as AEC will help pave the way for the 10 member countries to achieve regional economic integration. As a result, the ASEAN region is set to see a freer movement of goods, services, investment, skilled labor and capital among its member countries. Organizations are also facing a whole lot of challenges in taxation to comply with new rules and taxation system. We will need to make sure that all relevant regional regulatory frameworks, including the area of regional tax integration arrangements, will be sufficiently suitable and appropriate for facilitating the single market and other regional economic goals.

To take full advantage of the emerging opportunities and address the accompanying challenges, businesses and tax practitioners need to prepare themselves in several aspects. In particular, they need to understand Thailand’s revised taxation structure and the tax issues related to AEC as well as their implications. Tapping into these new issues and challenges, Asia Business Connect has specially organized this must-not-miss conference on “ASEAN Tax/Thai Tax Summit 2015: Opportunities & challenges from tax changes for outbound & inbound investment”. This year’s conference will highlight all the key potential implications to explore the challenges and opportunities including latest government policy & scenarios on tax restructuring to enhance competitiveness and preparation for AEC, effective tax planning strategies for AEC 2015 and their impact on businesses, customs & international trade & FTA, cross-border tax dispute settlement, cross-border transactions and tax risk management, updates on corporate taxation, Board of Investment (BOI) tax holidays, recent changes in transfer pricing, indirect tax, anti-tax avoidance, VAT, CLMV key tax updates and much more.

Secure seats for you and your key team now! We will be delighted to see you in person on 25-26 June 2015. This conference will be an ideal opportunity for tax executives to meet their peers and tax administrators to exchange ideas and gain latest insights by tax professionals from leading tax consulting firms. Seats are limited and will be allotted on a first come, first served basis.

Your partner in success,
Asia Business Connect Co., Ltd.

KEY BENEFITS OF ATTENDING:

- Hear up-to-date government policy and tax system for AEC integration 2015
- Understand the varieties of different perspectives for further regional tax integration developments
- Update on BOI tax privileges and promotion tax incentives
- Identify critical factors to mitigate tax pitfalls in corporate transactions
- Negate the risks from changing regulations in taxation
- Discover strategies to enhancing transfer pricing risk framework and response plan
- Explore tax efficient structures for cross-border transactions
- Determine current tax regimes on VAT and the risks of DTA
- Bring professionals and experts involved in taxation to exchange opinions and discuss the issues and challenges facing the arrangements of regional tax integration

WHO SHOULD ATTEND:

- Presidents, MDs, CEOs
- CFOs
- Finance/Accounting Directors
- Heads of Tax
- Regional Tax Managers/Tax Managers
- Finance & Administration Managers
- Tax Executives/Managers
- Tax Compliance/Business Control Officers
- Tax Consultants/Tax Lawyers
- Auditors/Corporate Counselors
- Other professional advisors looking to update their knowledge and experience

News Clippings:

- Thailand Shelves New Real Property Tax: In a surprise move on March 12, Thailand’s Prime Minister Prayut Chan-o-cha announced an indefinite postponement of the proposed land and buildings tax, due to its potential impact on low-income homeowners and the country’s uncertain economic outlook. The new land and buildings tax would replace the local house and land tax that is based on historical and low property valuations. This change was thought to be an integral part of the military-led Government’s overall plans to reform Thailand’s tax system through increased taxes on the wealthiest individuals to fund economic development. However, while chairing a policy meeting, Prayut requested a delay to the proposed tax and instructed the relevant government departments to reconsider and study its structure. No timeframe has been set for the completion of that study. (Global Tax News, 16 Mar 2015)

- Thailand ‘not a high-tax country’: The country’s ranking by tax revenue to GDP is 153rd out of 180 countries and fifth in the Asean region, the Fiscal Policy Office (FPO) said. Thai government revenue accounts for 20.6% of GDP, considered relatively low compared with averages of 40.1% in OECD countries and 24.5% in Asean, director-general Krisada Chinvicharana said, referring to a 2013 report by the International Monetary Fund. His comments followed a World Bank report circulated on social media that Thais paid the highest tax in Asean and seventh highest in the world. The report is incorrect, as it compared Thailand, which has a single government, with countries that have a federal system in which the central government typically collects lower tax revenue, Mr Krisada said. (Bangkok Post, 14 Mar 2015)

- Prayut seeks tax system overhaul: PRIME MINISTER General Prayut Chan-o-cha yesterday pointed to the need for restructuring the country’s entire tax system in order to increase government revenue, as more funds are needed to support investment in infrastructure. He said local administrations had been able to collect Bt70 billion so far this fiscal year, or 15 per cent of the tax-revenue target, but the government had to allocate funds from the central budget to cover the balance of their spending. “We are paying around Bt200 billion to the local administrations, and there is still around Bt200 billion to Bt300 billion left to be collected” by them, Prayut said. “If the amount of tax revenue that can be collected by local administrations keeps falling or cannot be collected, the more money we have to allocate to cover it. And that means the money that could be used for investment on infrastructure and other things would also be gone,” the prime minister explained. (The Nation, 14 Mar 2015)
Yes! Please register the following delegate(s):

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Tel: Fax: Company E-mail Address:

Appointing Manager: [Mr/Mrs/Ms] Name: 
Position: Business E-mail:

Booking Contact: [Mr/Mrs/Ms] Name: Position:
Tel: Fax: Business E-mail:

(Please photocopy for more delegates. Kindly fill in the registration form in English)

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Department: Business E-mail:
Direct Line: Mobile:
2) [Mr/Mrs/Ms] Name: Position:
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4) [Mr/Mrs/Ms] Name: Position:
Department: Business E-mail:
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5) [Mr/Mrs/Ms] Name: Position:
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Direct Line: Mobile:

REGISTRATION FEE (Please check as appropriate)

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<th>Fee per Delegate</th>
<th>Conference (25-26 June 2015)</th>
<th>Early Bird (Payment is made before by 25 May 2015)</th>
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<td>Registration Fee per Delegate</td>
<td>Early Bird</td>
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<td>VAT 7%</td>
<td>Early Bird 24,500.00</td>
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TOTAL (Baht) 26,215.00 23,593.50 28,355.00 25,519.50

**Registration fee for companies located outside Thailand: Early Bird Fee: USD 950 per delegate, Normal Fee: USD 1,050 per delegate.**

**CONFERENCE VENUE:** The Landmark Hotel, Bangkok
138 Sukhumvit Road, Bangkok 10110
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www.landmarkbangkok.com

**ORGANIZER**
Asia Business Connect, Thailand’s leading conference and training organizer, is managed by a team of dedicated and talented professionals with more than 20 years experience and expertise in conference management and organization as well as training activities for major businesses and their key executives in Thailand and other countries in Asia, which include Singapore, Malaysia and Vietnam. Visit our website at www.asiabusiness-connect.com.

**CANCELLATION AND TRANSFERS**
If you are unable to attend, a substitute delegate is welcomed at no extra charge. Kindly provide name and title of the substitute delegate at least 2 working days prior to the conference. A refund less Baht 3,500 administration charge will be made for cancellation received in writing on or before 4 June 2015. Regrettably, no refund can be made for cancellation received after this date. A complete set of documentation will however be sent to you.

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- Check/Bank Draft: Please cross cheque or bank draft made payable to: Asia Business Connect Co., Ltd.
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**ASIA BUSINESS CONNECT CO., LTD.**
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Payment prior to the conference is required to complete your registration. An admission form will be sent to you prior to the conference. Walk-in delegates with payment will be admitted subject to space availability.

**FOR NORMAL REGISTRATION:** In order to avoid any inconvenient circumstances to delegates at the conference, payment should reach us 7 days prior to the conference date.

(The organizer reserves the right to amend programs without notice.)

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