กลยทธ์การวางแผนและจัดการภาษีองค์กรธรกิจด้วยเทคนิคปฏิบัติอันเป็นเลิศ

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BDO

















LEARN & CONSULT WITH 10 TOP-NOTCH TAX EXPERTS FROM LEADING FIRMS

- PricewaterhouseCoopers Legal & Tax Consultants
- Deloitte Touche Tohmatsu Jaiyos Advisory
- Bangkok International Associates
- DFDL Legal and Tax

- BDO Advisory
- Suvarnabhumi Law
- Siam City Law Offices
- HNP Legal / TAXAND
- Quantera Global

CUTTING - EDGE LEARNING POINTS in 2 DAYS

การบรรยายส่วนใหญ่ใช้ภาษาไทย

DAY ONE 3 July 2014

- * NEW TAX REGULATION & DIRECTION
- **★ BOI TAX INCENTIVES** & PROMOTION
- **★ THAI TAX & FOREIGN INVESTMENT**
- * 'TAX SAVING' OPTIMIZATION
- **★ TAXATION ON DUE DILIGENCE and M&A**

DAY TWO 4 July 2014

- **★** TAXATION ON **FINANCING**
- 🖈 INTERNATIONAL TAX PLANNING
- ★ CROSS BORDER TAX TRANSACTIONS
- * TAX AUDIT & TAX RISK
- **★ TRANSFER PRICING**

CONFERENCE HIGHLIGHTS: Towards AEC 2015

TAX REGULATORY UPDATE

- Latest Update Thailand's Tax Regulation & Direction in 2014 & Beyond
- Latest Updates and Directions of BOI Investment Promotion and Tax Incentives

TAX PLANNING & MANAGEMENT

- Managing Tax Savings: Practical Advice & Proven Strategies
- Effective Tax Planning for Due Diligence & M&A Deals
- Tax Liabilities & Planning on Financing: Managing Complexities & the Unexpected
- How To Survive Tax Audit & Tax Risk Management: Proven Strategies & Real Practices

CROSS-BORDER TAXATION

- Thai Tax Planning Strategies for Outbound Investment International Tax Update
- International Tax Planning & Cash Flow Management: Strategies and Solutions
- Cross Border Tax Transactions & Tax Treaties: AEC & Thai Perspectives
- Latest Effective Practices in Transfer Pricing: Key Issues & Future Practices





กลยุทธ์การวางแผนและจัดการภาษีองค์กรธุรกิจด้วยเทคนิคปฏิบัติอันเป็นเลิศ เรียนรู้และปรึกษาหารือกับผู้เชี่ยวชาญจากองค์กรชั้นนำ ได้แก่

DAY ONE 3 July 2014



1. Ms. Supavadee Lipiwathana Director PricewaterhouseCoopers Legal & Tax Consultants Ltd.,



2. Ms. Ornjira Tangwongyodying Partner PricewaterhouseCoopers Legal & Tax Consultants Ltd.,



3. Mr. Mark Jayasinghe Principal Tax & Legal Services BDO Advisory, Ltd.,



4. Mr. Teerakarn Noichiaum Senior Associate Bangkok International Associates



5. Mr. Chaiyong Ngampravatdee Managing Director Suvarnabhumi Law Ltd.,

DAY TWO 4 July 2014



6. Mr. Picharn Sukparangsee Siam City Law Offices Ltd.,



7. Mr. Jack Sheehan Regional Partner, Tax Practice Group DFDL Legal and Tax



8. Ms. Wanna Suteerapornchai Tax Partner Deloitte Touche Tohmatsu Jaiyos Co., Ltd



9. Mr. Chinapat Visuttipat Partner / Managing Director - Tax Legal & Commercial Contract Tax & Property Transaction HNP Legal / TAXAND



10. Mr. Peerapat Poshyanonda Partner PricewaterhouseCoopers Legal & Tax Consultants Ltd.,



11. Ms. Grace Molina Transfer Pricing Director DFDL Legal and Tax

Special Session

KEY CHALLENGES FACING TAX PROFESSIONALS

- 1. Recent changes in tax policy and regulations, new guidelines and rules on Taxation have been introduced
- 2. Trend towards greater transparency and accountability have become more pressing on all corporate executives.
- 3. The role of Tax professionals has become increasingly more complex in the current and future changing business environment
- 4. Tax practitioners find it more timely than ever to keep abreast of what these changes have been and the real implications and impacts for their business would be.
- 5. It has become critical for tax professionals to stay at the cutting edge & is to keep abreast of all changes, proactively managing all tax risks, as well as obtaining ready-to use tax solutions from key experts
- 6. Top taxation issues are; updates and changes in tax policy, tax planning strategies, tax audit, tax saving, taxation in M&A deals, tax risk management, taxation on cross-border transactions, tax risk mitigation, and how to structure tax efficient operations to meet today's globalization and economic uncertainties.

KEY BENEFITS OF ATTENDING

- Keep abreast of legal and policy changes in Thai tax & Cross-border Treatises
- Update on the latest thinking and planning techniques in the key tax areas to optimize your business benefits
- Capitalize on **Thailand tax incentives** offered to companies & foreign investors
- Benefit from practical experiences on managing tax savings
- Uncover tax processes, audit strategies in Thailand for efficient tax planning
- Discover how to structure tax efficient operations in Thailand and International arenas
- Connect & benchmark with tax professionals & experts through the 2 day intensive learning

WHO SHOULD ATTEND

MDs, GMs, CEOs, CFOs, Finance Directors / Controllers and Tax Professionals such as

- Accounting Directors/Managers
- Heads of Tax
- Regional Tax Managers / Tax Managers
- Finance & Administration Directors / Managers
- Auditors / Lawyers/Corporate Counselors
- Legal Counsel/Advisors / Managers
- Foreign Investment Professionals
- Other professionals & advisors looking to update their knowledge and experience on Taxation







3 July 20'

Chairperson Mr. Chaiyong Ngampravatdee Managing Director Suvarnabhumi Law Ltd.,



09.00-17.00

NEW TAX REGULATION & DIRECTION

Latest Update - Thailand's Tax Regulation & Direction in 2014 & Beyond: the New Road Ahead





Ms. Supavadee Lipiwathana Director PricewaterhouseCoopers Legal & Tax Consultants Ltd.,



KEY LEARNING POINTS

- · Macro view on Thailand tax directions
- Important Tax Rules and Changes in Thailand
- Implications of Tax Laws and Rules for corporate / investors
- How to Effectively Deal with Changes
- Update on Vat Regulations and Efficient Tax Planning

บรรยายเป็นภาษาไทย

คุณสุภาวดี ลิปิวัฒนา ได้ให้คำปรึกษาแก่กลุ่มบริษัทข้ามชาติชั้นนำหลายแห่งในด้านภาษีอากรต่างๆ เช่น การให้คำปรึกษาทั่วไปเที่ยวทับภาษีอากร การปรับโครงสร้างกิจการ(รวมถึงการโอนทิจการ การควบร่วมกิจการ) การให้คำแนะนำในด้านการลงทุนแก่นักลงทุนไทย และต่างประเทศ ในการ ลงทุนในต่างประเทศและในประเทศไทย และการให้คำแนะนำในการจัดเตรียมแบบแสดงรายการภาษีเงินได้นิติบุคคลนอกจากนี้ คุณสุภาวดี ลิปิวัฒนา ้มีส่วนร่วมเป็นส่วนหนึ่งของผู้ให้ความเห็นเกี่ยวกับการแก้ไขกฎหมายภาษีอากร เช่น สิทธิประโยชน์ทางภาษีอากรสำหรับสำนักงานปฏิบัติการภูมิภาค

10.00 - 10.15 Networking & Refreshment

BOI PROMOTION & TAX INCENTIVES

Latest Updates and Directions of BOI Investment Promotion and Tax Incentives





Ms. Ornjira Tangwongyodying

PricewaterhouseCoopers Legal & Tax Consultants Ltd.,



KEY LEARNING POINTS

- Updates & Policy Direction: New BOI tax Privileges and Promotion Tax Incentives
- BOI investment policies & initiatives
- · Tax incentives for investment projects in Thailand
- Tax Incentive Planning for Targeted Industries
- Tax implications with BOI and without BOI
- · New Tax Rules and Future Direction

บรรยายเป็นภาษาไทย

Ornjira is a Partner of PricewaterhouseCoopers in Bangkok, Thailand. She worked for a major international law firm for 9 years before joining a legacy firm in 1995 and became a tax and legal partner in 1997. She was the head of financial services industry in our tax practice. She is the engagement tax partner for many multinational banking, insurance and securities clients. She advises multinational companies and financial institutions on solutions to various transactions, e.g. financial derivative products, debt restructuring, capital market, mergers & acquisitions, public raising fund program, loan refinancing, leasing, claim payment. She also has extensive experience with tax compliance and operational tax risk review and merger & acquisitions deal over multinational companies and financial institutions .

10.15 - 11.15 Networking & Refreshment

THAI TAX & FOREIGN INVESTMENT

Thai Tax Planning Strategies for Outbound Investment - Key International Tax Update





Mr. Mark Jayasinghe Principal Tax & Legal Services BDO Advisory, Ltd.,



บรรยายเป็นภาษาอังกฤษ

KEY LEARNING POINTS

- Major Tax Issues in AEC developments
- Corporate tax rules for foreign income
- Foreign tax credit relief

- · Foreign dividend tax planning
- Holding company structures
- · Constructing a tax efficient investment

Mark has over 15 years experience in both practice and industry including 3 years in Thailand. His specialties include corporation tax and international tax. His industry experience includes oil and gas related services, the retail sector and property services. Mark holds a Bachelor of Arts Honours degree from the University of Exeter in accounting and finance. He is a member of the Institute of Chartered Accountants in England & Wales.

12.15 - 13.30 Lunch & Networking

'TAX SAVING' OPTIMIZATION

Managing Tax Savings: Practical Advice & Proven Strategies

13.30 15.00



Mr. Teerakarn Noichiaum Senior Associate Bangkok International Associates



บรรยายเป็นภาษาไทย

- Tax savings opportunities: Domestic & Oversea
- Techniques for reducing your company's overall tax rate
- Techniques in managing tax savings
- Critical factors & concerns on successful tax savings
- Tax savings through stock options and warrants management

Teerakarn Noichiaum received his Bachelor of Law degree from Ramkhamhaeng University. He previously worked for Tax Research Center and Baker Tilly Tax in Bangkok. He has written various articles on tax laws. He specializes in contract drafting, banking and financial agreements, including derivatives, and taxes. He joined Bangkok International Associates in 2008.

15.00 - 15.15 Lunch & Networking

TAX/ DUE DILIGENCE & M&A DEALS

EFFECTIVE TAX PLANNING FOR TAX DUE DILIGENCE & M&A DEALS





Mr.Chaiyong Ngampravatdee Managing Director Suvarnabhumi Law Ltd.,



KEY LEARNING POINTS

บรรยายเป็นภาษาไทย

- Tax Strategies for Due Diligence and M&A Agreements / Transactions
- Tax Planning Techniques for M&A Deals
- Maximizing Values from M&A Taxation and Reducing Tax Risk through Deal Structuring
- Taxation of Cross-Border Mergers & Acquisitions: In-bound & Out-bound

Chaiyong has been working as a legal advisor in the area of legal and tax for over 20 years. From 1990-1993, he worked for Tilleke & Gibbins in Bangkok where he provided legal advice to clients on business and taxation laws. During 1993-1996, he was a Tax Manager at Price Watherhouse, Bangkok. From 1996-2004, he was a core partner of the Baker & McKenzie Bangkok office's tax practice group. In 2005, Chaiyong sets up his own practice with his associates to provide legal and tax services to both domestic and international clients. He specializes in business and taxation laws, including tax planning to reduce the costs of business. He regularly provides tax advice and tax planning techniques for foreign and local companies under both private and government projects for investments in Thailand and overseas and also works for joint ventures between local and foreign companies.

16.45 - 17.00 Chairperson's Summary

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4 July 20'

Chairperson Mr. Picharn Sukparangsee Partner Siam City Law Offices Ltd.



09.00-18.15

TAXATION ON FINANCING

Tax Liabilities and Tax Planning on Financing: Managing Complexities & the Unexpected

10.00



Mr. Picharn Sukparangsee Partner Siam City Law Offices Ltd.,



KEY LEARNING POINTS

- Tax Considerations on Structuring a Financial Deal
- Impacts of Tax Regulation on The Financing of Business Operations and Investments
- Tax issues on derivatives, debt and equity
- Tax Planning Techniques on Financing
- Managing the Unexpected Financial Transactions

บรรยายเป็นภาษาไทย

Mr. Picharn Sukparangsee is a practitioner in Securities Law, Company Law and Taxation Law. Apart from the first law degree from Thammasat University, admission to Thai Bar Association, he obtained LLM from University of Warwick and LLM from King's College London of University of London. He is an active member of the Legal and Tax Committee of the British Chamber of Commerce of Thailand. He provides advice as an advisor of the Thai-Canadian Chamber of Commerce. Apart from a member of International Fiscal Association of Thailand or IFA, he is also a member of International Bar Association or IBA and Inter-Pacific Bar Association or IPBA. His contribution on Thailand Chapter has been made to Doing Business as arranged by the World Bank and the IFC. He is a speaker at conferences on Taxation law, Securities Law and M&A transactions. He has contributed to activities as a committee member of Thammasat Law Alumni Association.

10.00 - 10.15 Networking & Refreshment

INTERNATIONAL TAX PLANNING

International Tax Planning & Cash Flow Management: Strategies and Solutions





Mr. Jack Sheehan Regional Partner, Tax Practice Group DFDL Legal and Tax



KEY LEARNING POINTS

- Major tax issues and how to minimize tax exposures / consequences
- Increasing cash flow from tax perspectives
- Mitigating tax pitfalls in international transactions
- Tax planning techniques by industry

บรรยายเป็นภาษาอังกฤษ

Jack is a Partner in the regional tax practice group. He specializes in providing international tax planning and consulting, corporate structuring and restructuring, M&A and cross-border tax advisory services. 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 regularly invited as a speaker on international taxation issues at events in the SE Asia Region including IFA, IBFD, CCH, Thai Tax Forum, Australian Chamber, American Chamber, Euro-Cham, Japan Board of Investment, In-house Counsel, Indian Chamber, Canada Chamber, Chinese Chamber, Myanmar Private Sector Forum and DFDL sponsored events. Jack and his team are regular contributors to international tax publications including International Tax Review, IBFD, Bloomberg BNA and CCH. He is a member of the Association of Chartered Certified Accountants in the UK. He speaks English, Lao and basic Thai.

10.15 - 11.15 Networking & Refreshment

CROSS - BORDER TAX TRANSACTIONS

Critical Issues in Cross-Border Tax Transactions & Tax Treaties: AEC & Thai Perspectives





Ms. Wanna Suteerapornchai Tax Partner Deloitte Touche Tohmatsu Jaiyos Co., Ltd

Deloitte.

KEY LEARNING POINTS

- Application of tax treaties (permanent establishment, business profit, royalty, interest, and other income)
- Case study related to cross-border transactions including recent court cases
- Cross-border transactions from the AEC & Thai perspective
- Cross border finance international guarantees, international letters of credit

ึบรรยายเป็นภาษาไทย

Wanna is a Tax Partner in Tax & Legal Business Unit of Deloitte Bangkok, Thailand. Wanna's primary areas of practice are mergers and acquisitions, international tax, and business tax. She is involved in providing tax advice, including domestic tax considerations in the areas of cross border transactions, corporate income tax, value-added tax, specific business tax etc. She works closely with multinational companies to perform tax work related to existing and potential investments in Thailand. Wanna specializes in advising international clients planning to invest in Thailand in manufacturing, real estate, financial services/products, consumer products, pharmaceutical, and energy & utilities etc. She has also been involved in a number of high profile M&A deals; providing tax advice on the structuring and tax due diligence services.

12.15 - 13.30 Lunch & Networking

TAX AUDIT & TAX RISK

How To Survive Tax Audit & Tax Risk Management: Proven Strategies & Real Practices

15 00



Mr. Chinapat Visuttipat Partner / Managing Director - Tax Legal & Commercial Contract Tax & Property Transaction HNP Legal / TAXAND





KEY LEARNING POINTS

- Policy & procedures of the Revenue Department in the conduct of tax audit
- Common tax issues raised in a tax audit & tax tips
- Document preparation for tax audits
- Regular problems and tax issues relating to auditing
- How to prepare and act during a tax audit
- How to negotiate effectively with the Revenue Department
- Tax litigation and dispute processes
- Case examples of tax problems: how to overcome and minimize problems

บรรยายเป็นภาษาไทย

อาจารย์ชินภัทร วิสทธิแพทย์มีประสบการณ์ในงานให้คำปรึกษาด้านกฎหมายและภาษีทั้งในไทยและ ภาษีระหว่างประเทศ รวมถึงมีประสบการณ์ ้บรรยายในงานสัมมนาด้านภาษีและเป็นอาจารย์ พิเศษด้านภาษีและกฎหมายธุรกิจทั้งระดับปริญญาตรีและปริญญาโทในมหาวิทยาลัยของรัฐ และเอกชน ตลอดจนเป็นคอลัมนิสต์ประจำด้านภาษีและกฎหมายธรทิจในวารสารทางธรทิจ หลายฉบับ นอกจากนั้น ซินภัทรได้ให้ความช่วยเหลือ ภาคธุรกิจและเอกชนผ่านคณะกรรมการ ภาษีของสภาหอการค้าแห่งประเทศไทยและทำหน้าที่เป็นผู้ไกล่เกลี่ยคดีภาษีประจำ ศาลภาษีอากรกลาง

15.00 - 15.15 Networking & Refreshment

TRANSFER PRICING

Latest Effective Practices in Transfer Pricing: Key Issues & Future

15.15 16.45



Mr. Peerapat Poshyanonda
Partner
PricewaterhouseCoopers Legal & Tax Consultants Ltd.,



KEY LEARNING POINTS

- How to Using transfer pricing in Tax Planning
- How to deal with common problems of transfer pricing
- How to Advance Pricing Agreements
- Areas attracting the attention of revenue authorities
- Implementing transfer pricing in your organization
- · Common mistakes and solutions

บรรยายเป็นภาษาไทย

Peerapat Poshyanonda joined PricewaterhouseCoopers Legal and Tax Consultants Ltd. ("PwC") in 1995. Peerapat is the tax partner leading the Corporate Tax business unit and the Transfer Pricing team under the Corporate Tax business unit. Prior to joining PwC, He worked for the Policy and Planning Division of the Thai Revenue Department for eight years. His main responsibilities when working at the Revenue Department were Double Tax Treaties and Mutual Agreement Procedures negotiations. At PwC, Peerapat has been reviewing transfer pricing practices adopted by multi-national companies in Thailand in a wide range of industries such as pharmaceutical, electronics, automotive, food, textile, consumer goods, trading, banking, insurance, etc. His work in this area includes advisory, benchmarking and documentation, Advance Pricing Agreement, value chain transformation and transfer pricing dispute resolutions. Besides transfer pricing, Peerapat specializes in international tax planning and structuring, double taxation agreement, corporate income tax, withholding tax, VAT, and tax dispute resolutions. Peerapat is the author of the "Thailand Transfer Pricing Chapters" published by the International Bureau of Fiscal Documentation. He has also been a speaker on transfer pricing and Thai taxes at seminars held by PwC and a guest speaker for other organizations, such as the Asia Business Forum, American Chamber of Commerce and the Institute for Business and Professional Development of Thailand, Irving. He has been a guest lecturer on Thai taxation at universities and other educational institutions. Peerapat holds an MBA, University of Missouri-Columbia, USA and B.SC.(Hons) in Economics, University of Surrey England.

AEC – Regional Transfer Pricing Trends

16.45 17.45



Ms. Grace Molina
Transfer Pricing Director
DFDL Legal and Tax



Special Session

บรรยายเป็นภาษาอังกฤษ

Grace, as Transfer Pricing Director, is seconded to DFDL's Tax Practice Group based in Ho Chi Minh City and has over 15 years of combined corporate, legal, international tax and transfer pricing experience in the Philippines and Vietnam. She is concurrently a director of Quantera Global, the world's leading independent transfer pricing advisory firm, providing specialist transfer pricing services to multinationals of all sizes across the globe, having previously gained valuable experience as a Transfer Pricing Senior Manager in a Big 4 accounting firm in Vietnam. Prior to this, she worked for a Big 4 accounting firm as well as a law firm in the Philippines and led the Legal section of the trust and investments division of one of the Philippines' leading banks. Grace holds a Bachelor of Laws (University of the Philippines Diliman) and a Bachelor of Arts in English Studies (University of the Philippines Diliman). She speaks English, Filipino and basic Vietnamese.

17.45 - 18.00 Chairperson's Summary

Must-Not-Miss Event for All Executive & Tax Professionals

- ✓ Covering Key Tax Rules & Advice on Tax Management
- Minimizing Global & Local Tax Risk & Burden
- Examining All Critical Aspects & Timely Issues of Taxation





TAX Strategy & Management 2014 Proven Solutions & Real Practices



Registration Form

3-4 July 2014 @ JW Marriott Hotel, Bangkok

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Key Information

When

3-4 July 2014 Where

JW Marriott Hotel, Bangkok

4 Sukhumvit Road, Soi 2 Bangkok, Thailand Tel: 66-2-6567700 Fax: 66-2-6567711

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Premium Quality	Save B 4000 (each person) For 4 Delegates or more Applying at the same time ลคพิเศษ 4000 บากต่อท่าน เมื่อสมัครพร้อมกันตั้งแต่ 4 ท่านขึ้นไป	Save B 2000 (each person) For 2-3 Delegate Applying at the same time ลดพิเศษ 2000 บาทต่อท่าน เมื่อสมัครพร้อมกัน 2-3 ท่าน	Value for Money
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Plus: VAT 7% Deduct: Withholding Tax 3%*	1,393.00 597.00	1,533.00 657.00	1,673.00 717.00
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