



Mastering the International Taxation & Transfer Pricing

(Virtual for 7 Days on Zoom Platform)



Organized by: ICAI PIMPRI CHINCHWAD BRANCH (WIRC)

Along with Vapi, Bharuch, Bhuj, Jalgaon, Satara, Nanded, Nagpur, Akola Branches (WIRC), Raipur Branch (CIRC)

Date- 17th, 18th, 19th, 20th, 22nd, 23rd & 24th Sep, 25 | Time - 5:00 PM-7:00 PM | Zoom Link- will be share after registration

Fees For All 7 Days Session (Only for CA Members) Rs.500+18%

For Online Payment Link - <https://tinyurl.com/s5xw22xc>

For Queries - 9503111836 or mail us at pimpri.chinchwad@icai.org



PROGRAMME SCHEDULE

NO CPE Hrs.

DAY & DATE	TOPICS	SPEAKERS
Day 1 Wednesday, 17 th Sep'25	International Tax Landscape – Framework, Trends & Indian Context Understand the global tax framework including OECD, UN, and India's treaty network. Get clarity on concepts like residence, source-based taxation, and how they impact Indian taxpayers and MNEs.	CA Ameya Kunte
Day 2 Thursday, 18 th Sep'25	Permanent Establishment (PE) & Business Connection Cover the basics of PE under treaties and Business Connection under domestic law. Discuss digital economy taxation (SEP) and its practical implications for foreign companies and Indian affiliates.	CA Sudin Sabnis
Day 3 Friday, 19 th Sep'25	Overview of Transfer Pricing – Indian Regulations & Global Standards Lay the foundation of transfer pricing including Sections 92–92F, Rule 10D, and OECD alignment. Cover TP methods, comparability, and key administrative requirements.	CA Yatin Nageshkar
Day 4 Saturday, 20 th Sep'25	Documentation & Transparency Compliance – 3CEB, Master File & CbCR Explore the current documentation obligations under Indian TP law – 3CEB, Master File (Form 3CEAA), and Country-by-Country Reporting (Form 3CEAD). Learn thresholds, due dates, and audit risk management.	CA Suraj R Agrawal
Day 5 Monday, 22 nd Sep'25	Dispute Resolution – APA, MAP & Risk Mitigation Strategies Understand how Advance Pricing Agreements (APA) and Mutual Agreement Procedures (MAP) help resolve TP and tax disputes. Learn timelines, benefits, and when to consider each route practically.	CA Pavan Dudhediya
Day 6 Tuesday, 23 rd Sep'25	Global Minimum Tax (Pillar 2), Pillar 1 & Future of International Tax Get updated on OECD's Pillar 1 & Pillar 2 developments. Discuss India's stance, applicability thresholds, top-up tax risks for low-taxed entities, and what Indian MNEs need to prepare for.	CA Amit Dhadphale

DAY & DATE	TOPICS	SPEAKERS
Day 7 Wednesday, 24 th Sep'25	Withholding Tax, Treaty Benefits & GAAR Dive into cross-border payments and withholding obligations under the Act and treaties. Cover TRC, Form 10F, GAAR overview, and anti-avoidance measures that affect inbound/outbound structures.	CA Nachiket Barve

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