

Reinventing the Tax Landscape: Get Future Ready!

International tax rules are undergoing their most dramatic transformation in decades. The tax landscape isn't just evolving—we're witnessing a complete redefinition of how global taxation operates. Join over 20 distinguished speakers from government, industry, academia and the legal sector both local and overseas as they tackle the pivotal issues reshaping Asia's tax future at this conference.

EARLY BIRD SPECIAL

\$1308/pax (incl GST)

\$981/pax

* Overseas participants, who in their business capacity belong overseas and are sponsored by overseas employers, will pay SGD900 (excluding GST) for early bird special

**Sands Expo and Convention Centre,
Begonia and Cassia Ballrooms, Level 3**

19 May 2026, 9am to 5:30pm

Programme

Reinventing the Tax Landscape: Get Future Ready!

19 May 2026

08:00 - 09:00 Registration and Breakfast

09:00 - 09:05 Welcome

PART I: SETTING THE SCENE – THE FUTURE OF TAX

09:05 - 09:15 Welcome Address by CEO of Tax Academy

- Mr Dennis Lui

Chief Executive Officer (CEO), Tax Academy of Singapore & Deputy Commissioner (Indirect Taxes, Law & Investigation Group), Inland Revenue Authority of Singapore (IRAS)

09:15 - 09:30 Opening Address by Guest of Honour – Second Minister for Finance

- Ms Indranee Rajah

Minister in the Prime Minister's Office and Second Minister for Finance & National Development

Keynote Moderator:

Prof. Dr. Robert Danon, Professor of Swiss and International Tax Law and Director, Tax Policy Center, University of Lausanne & Founding Partner, DANON

09:30 - 10:00 Keynote Address 1: Can the international tax system be stabilized ? Latest developments

- Overview of the 2025 OECD Model Tax Convention update and ongoing work in tax treaty and transfer pricing
- Can tax certainty be achieved? latest on the tax policy agenda within and beyond MAP
- Overview of the January 2026 Pillar Two “side-by-side” package
- The Pillar Two “side-by-side” package and the design of tax incentives

- Dr. Achim Pross

Deputy Director, Centre for Tax Policy and Administration (CTPA) Organization for Economic Cooperation and Development (OECD)

10:00 - 10:20 Keynote Address 2: A Response to Keynote 1 and Commentary by a Former OECD/UN Official

- Current and Future Developments

10:20 Coffee Break

Co-chairs

**Prof. Dr. Robert Danon, Professor of Swiss and International Tax Law and Director,
Tax Policy Center, University of Lausanne & Founding Partner, DANON**
Dr. Giammarco Cottani, Founding Partner, NOEMA Global – Tax & Policy

10:50 – 11:20

Panel Discussion

Audits, judicial remedies, MAP, BAPA and beyond: the practical perspective

- Current “hot” transfer pricing and tax treaty in practice (including most recent case law) and relevant for the Asian region
- Differences in handling disputes and dispute prevention (BAPAs and the development on BAPAs for non-TP issues if ready)
- Pressure on MAP/BAPA access and operation; criminal law ramifications
- Managing tax risks (including reputational risks) relation with the board and outside stakeholders

- Discussion leader:

- **Dr. Niv Tadmore**, Partner, Jones Day

- Panel members:

- **Ms Ng Pei San**, Tax Director (Transfer Pricing and Dispute Resolution Branch), Inland Revenue Authority of Singapore (IRAS)
- **Mr Mukesh Butani**, Founder and Managing Partner, BMR Legal Advocates

11:20 – 12:00

Audits, judicial remedies, MAP, BAPA and beyond: the policy experience (OECD and UN perspective)

OECD perspective

- The new OECD Manual on Effective Mutual Agreement Procedures (MEMAP)
- Differences in handling disputes and dispute prevention (BAPAs and the development on BAPAs for non-TP issues if ready)
- Other policy options currently considered (expert opinion, mediation etc)
- Managing disputes beyond MAP (the index)
- The case of indirect taxes

UN perspective

- Overview of UN Framework Convention
- UN protocol on dispute resolution

- Discussion leader:

- **Ms Belinda Chan**, Head, Tax, Temasek International

- Panel members:

- **Ms Linda Cheng**, Group Tax Specialist (Transfer Pricing and Dispute Resolution Branch), Inland Revenue Authority of Singapore (IRAS)
- **Ms Yong Sing Yuan**, Partner, Transfer Pricing, KPMG
- **Dr. Luisa Scarcella**, Global Policy Lead – Taxation and Trade, International Chamber of Commerce (ICC)
- **Mr Michael Nixon**, Partner, International Tax and Transfer Pricing, Deloitte

12:00 – 12:30

Pillar 2 and disputes

- Classification of GloBE disputes with practical examples
- Impact of a side-by-side model on GloBE disputes
- Tools available to resolve GloBE disputes and ongoing work at OECD level

- Discussion leader:

- **Dr. Achim Pross**, Deputy Director, Centre for Tax Policy and Administration (CTPA), Organisation for Economic Co-operation and Development (OECD)

- Panel members:

- **Prof. Georg Kofler**, Professor of International Tax Law, Institute for Austrian and International Tax Law, WU (Vienna University of Economics and Business)
- **Mr Nathaniel Carden**, Partner, Skadden, Arps, Slate, Meagher & Flom LLP
- **Mr Chester Wee**, Member of the Technical Expert Panel, Singapore Tax Academy Research Initiative (STAR!)

12:30

Lunch

PRACTICALITIES & FUTURE-PROOFING

14:00 – 15:10

Panel on Sharing of Country Experiences

Tax Administrations: Leveraging AI for Certainty

Dispute resolution:

- (a) Options available to the taxpayer in each respective country
- (b) Challenges and Resolutions

Digitalization and AI:

- (c) Respective countries' digitalisation journey in compliance and dispute management
- (d) AI-powered strategies for risk assessment and fraud detection; and data management towards faster tax certainty.
- (e) Automated Systems and Future of Exchange of information

Moderator:

Mr Dennis Lui, Chief Executive Officer, Tax Academy of Singapore & Deputy Commissioner (Indirect Taxes, Law & Investigation Group), Inland Revenue Authority of Singapore

Representatives from:

- **Mr Robin Ng**, Assistant Commissioner (Compliance Strategy and Insights Division) and Chief Data Officer, Inland Revenue Authority of Singapore
- **Mr Intouch Piyawin**, Director of International Tax Policy Division, The Revenue Department of Thailand
- **Mr Patrick O'Doherty**, Chief Data Officer, Inland Revenue New Zealand
- **Ms Jenny Wong**, Tax Lead, Policy and Advocacy, CPA Australia

15:10	Coffee Break
15:45 – 17:00	<p>Panel Discussion: Tax Incentives: a holistic perspective (impact of the Pillar 2 “Substance-based Tax Incentives Safe Harbour” relation with trade and investment law obligations)</p> <p>– Discussion leaders:</p> <ul style="list-style-type: none"> • Prof. Dr. Robert Danon, Professor of Swiss and International Tax Law and Director, Tax Policy Center, University of Lausanne • Dr. Giammarco Cottani, Founding Partner, NOEMA Global – Tax & Policy <p>– Panel members:</p> <ul style="list-style-type: none"> • Dr. Achim Pross, Deputy Director, Centre for Tax Policy and Administration (CTPA), Organisation for Economic Co-operation and Development (OECD) • Mr Mukesh Butani, Founder and Managing Partner, BMR Legal Advocates • Ms Rebecca James, Partner, International Arbitration, Linklaters Singapore (officially Linklaters Singapore Private Limited)
17:00-17:30	<p>Closing Keynote Lecture: Geographically Expansive Taxation</p> <p>This lecture identifies the increasingly common phenomenon of countries taxing in a geographically expansive manner. It provides examples of this phenomenon from around the world and considers the legal, practical and normative considerations it gives rise to.</p> <p>– Prof. John Vella Professor of Law, Faculty of Law, University of Oxford and Director (Law), Oxford University Centre for Business Taxation, Saïd Business School</p>
17:30	End of Conference

Speakers Bio



Dr. Achim Pross

In this role, he has overall responsibility for a number of key outputs including the Standard for Automatic Exchange of Financial Account Information in Tax Matters (Common Reporting Standard or CRS), the OECD's work to address the tax challenges arising from the digitalisation of the economy, many of the BEPS actions, as well as the work on tax administration and tax certainty and on countering tax crimes and other financial crimes. He joined the OECD in 2001.

Prior to joining the OECD, he worked in the tax department of a large US law firm working from offices in Washington D.C., Paris and London. Previously he was an assistant at Munich University's Research Centre for Foreign and International Tax and Financial Law.

Dr. Pross is a lawyer by background. He received his legal training at the University of Munich, the London School of Economics and Georgetown Law Centre, Washington D.C. He holds a PhD (Summa cum laude) in international taxation and was the winner of the International Fiscal Association's Mitchell B. Carroll Prize in 1997.



Prof. Dr. Robert Danon

Robert Danon is a Professor of International Tax Law and heads the Tax Policy Center from the University of Lausanne. From 2017 to 2025, Robert served as the Chairman of the Permanent Scientific Committee (PSC) of the International Fiscal Association. Next to his academic duties, Robert is a founding partner of DANON, an independent firm focusing on global tax controversies, international arbitration and tax-policy related matters. Robert is regularly called to give evidence as a testifying expert or to act as an expert counsel in the framework of mutual agreement and arbitration proceedings, including investment law or commercial arbitrations. He also advises MNE and government on tax-policy related matters. He is the co-editor of the two forthcoming volumes: "Tax Matters in International Investment Arbitration: General Questions, Jurisdiction, Merits and Remedies" (Kluwer) and "Tax treaty Interpretation under the Vienna Convention on the Law of Treaties" (IBFD).



Dr. Giammarco Cottani

Dr. Giammarco Cottani, Founding Partner of NOEMA Global Tax and Policy, is a distinguished international tax strategist with over 20 years' experience advising governments, multinational enterprises, and high-net-worth clients. He has led tax policy initiatives at Netflix and Agoda, contributed to OECD and UN transfer pricing projects, and guided Italy's Revenue Agency on BEPS and cross-border audits. Based in Abu Dhabi, he specializes in UAE taxation, international tax structuring, and global policy development.

Speakers Bio



Dr. Niv Tadmore

Dr. Niv Tadmore is widely regarded as one of the premier tax controversy lawyers in Australia, chiefly representing multinationals in disputes concerning the taxation of intangibles and the digital economy, transfer pricing, international tax and tax treaties, energy & resources and the operation of anti-avoidance powers in cross-border settings. Niv is a Band 1 lawyer who leads a highly experienced team that Chambers Asia-Pacific described as “an elite team,” and he was named Taxation Partner of the Year by Lawyers Weekly . He is the President of the Australian Branch of the International Fiscal Association and was the founding chair of the global IFA Supervisory Board; he has served on key Australian Taxation Office and Federal Treasury committees, including Dispute Resolution, Large Business Stewardship, and BEPS. Niv is also a member of the Melbourne University Tax Advisory Board and the New York University International Tax Board and is the Partner-in-Charge of the Jones Day Melbourne office.



Ms Ng Pei San

Pei San leads the Transfer Pricing and Dispute Resolution Branch in Inland Revenue Authority of Singapore (IRAS), which handles transfer pricing policy formulation, negotiation of Advance Pricing Arrangements and Mutual Agreement Procedures relating to transfer pricing issues with foreign tax authorities. She has experience in tax policy work and international taxation matters.



Mr Mukesh Butani

Mukesh is the Founder and Managing Partner of BMR Legal Advocates, a boutique Indian law firm specialising in International Tax, Transfer Pricing, Tax Disputes and Tax Policy, ranked amongst top tier firms by Legal 500, Chambers and Partners, and other leading publications. With over three decades of expertise in corporate international tax and transfer pricing, he advises Fortune 500 multinationals and major Indian corporations on cross-border tax structuring, business reorganisations, and tax controversies.

He co-founded BMR Advisors, a leading professional services firm, until its Big 4 transition in 2017. Prior to establishing BMR Legal Advocates in 2010, he led international tax practices at two Big 4 firms. A Chartered Accountant, he became Arthur Andersen National Partner in 1995 and Andersen Worldwide Partner in 1998. He serves as an expert witness in appellate and arbitration forums globally and has authored several publications on transfer pricing and tax policy.

Speakers Bio



Ms Belinda Chan

Ms Belinda Chan serves as Head, Tax at Temasek International Pte Ltd (“Temasek”), a Singapore headquartered investment company. Belinda has successfully negotiated multiple Advance Pricing Agreements, advocated at OECD forums, structured numerous institutional and investment transactions and engaged in extensive meetings and discussions with external regulatory and tax authorities worldwide. Belinda also contributes to industry discourse as a speaker at OECD Forums, Big 4 Accounting conferences and professional industry events.



Ms Linda Cheng

Ms Linda Cheng is a Group Tax Specialist in the Transfer Pricing and Dispute Resolution Branch of the Inland Revenue Authority of Singapore. She is involved in transfer pricing policy formulation and negotiation of advance pricing arrangements (APAs) and mutual agreement procedure (MAPs) relating to transfer pricing issues.



Ms Yong Sing Yuan

Ms Yong Sing Yuan is a Partner in Transfer Pricing with KPMG in Singapore. She has over 20 years of experience in tax policy, international tax and transfer pricing. She specialises in transfer pricing, dispute prevention and resolution for multinationals.

Prior to joining KPMG, she was with the Inland Revenue Authority of Singapore (IRAS) where she headed the Transfer Pricing and dispute resolution branch.

Speakers Bio



Dr. Luisa Scarcella

Dr. Luisa Scarcella is the Global Policy Lead – Taxation and Trade at the International Chamber of Commerce (ICC), based at the ICC - UN Permanent Observer Office in NYC. She leads ICC's engagement on international tax policy in all different international and regional tax fora. Before joining ICC, Scarcella was a postdoctoral researcher at the DigiTax Centre of the University of Antwerp (Belgium), where she focused on the intersection between tax law and new technologies. In October 2020, Scarcella earned her PhD in tax law with distinction (highest honors) from the University of Graz. In the course of her career she has published her research in several international academic journals and won several academic awards.

She was also the International Fiscal Association (IFA) research associate for 2020 and currently seats on the IFA Permanent Scientific Committee (PSC).



Mr Michael Nixon

Michael is a highly experienced and commercial transfer pricing and practitioner with over 25 years of experience, including over 15 years in APAC, and currently is a transfer pricing partner at Deloitte and is the APAC Tax Policy Leader. Michael's experience covers all areas of international tax and transfer pricing law and policy, economic analysis and advisory, automation, and valuations. He has advised governments, has taught in university faculty, is a published author and has worked with tax administrations. Moreover, Michael spent four years at the OECD as a Senior Advisor where he worked on the tax challenges of the digital economy and various transfer pricing projects.



Prof. Georg Kofler

Prof. Georg Kofler is Professor of International Taxation at the Institute for Austrian and International Tax Law at WU Vienna, Austria. He is an active member of numerous formal and informal research networks and currently serves, among other roles, as Chair of CFE Tax Advisers Europe's ECJ Task Force. In May 2026, he will serve as a Visiting Scholar at the National University of Singapore, focusing on global tax law issues.

Speakers Bio



**Mr Nathaniel
Carden**

Building on several years of experience as a management consultant with McKinsey & Co. and serving as a law clerk for Hon. Diane P. Wood of the U.S. Court of Appeals for the Seventh Circuit, Mr. Carden specifically concentrates on the tax aspects of ongoing business operations. He works with corporate and other clients across many industries, with a particular focus on life science, health care and technology companies. Mr Carden's transfer pricing and operational planning practice focuses on planning and pre-audit issues arising from cross-border intangible property, service and financing transactions. He also has provided advice and related documentation concerning cross-border transactions and applying U.S. and Organisation for Economic Co-operation and Development (OECD) transfer pricing rules.



Mr Chester Wee

Mr Chester Wee is a senior tax advisor at EY Corporate Advisors Pte. Ltd., with over 26 years of international tax experience. Previously a senior partner at Ernst & Young Solutions LLP, he led EY's Asean International Tax and Transaction Services. Chester is known for his cross-border tax expertise and he actively shares BEPS 2.0 Pillar 2 insights on LinkedIn.



Mr Dennis Lui

Mr Dennis Lui is Deputy Commissioner (Indirect Taxes, Law & Investigation) with the IRAS and concurrently Chief Executive Officer (Tax Academy). As Deputy Commissioner, he oversees the Goods & Services Tax, Property Tax, Law as well as Investigation & Forensics Divisions in IRAS. Prior to that, he was Chief Executive, VITAL Shared Services from Apr 2020 to Mar 2024, leading more than 500 Corporate Services professionals serving over 100,000 public officers across 100 public sector organisations. He was Senior Director (Finance and Administration) in the Ministry of Home Affairs from Apr 2017 to Mar 2020. Dennis graduated from Oxford University with a BA Philosophy, Politics and Economics (First class), MSc in Management from the London School of Economics, and MBA from UCLA.

Speakers Bio



Mr Robin Ng Sy Horng is the Assistant Commissioner of the Data & Digital Ecosystems Division at the Inland Revenue Authority of Singapore (IRAS). He is concurrently the Chief Data Officer of IRAS. He oversees and leads the use of artificial intelligence, machine learning, and analytics to transform organisational processes, as well as drives data-related strategies and initiatives covering various data domains such as policies, acquisition, governance and infrastructure.

Mr Robin Ng Sy Horng



Intouch Piyanawin is a Senior Legal Officer at the Revenue Department of Thailand, specialising in international tax law and policy. His work focuses on tax certainty, dispute resolution, and the implementation of global tax reforms, including BEPS Pillar Two implementation.

Mr Intouch Piyanawin



**Mr Patrick
O'Doherty**

Patrick is currently the Chief Digital Officer for Inland Revenue New Zealand. He returned to Inland Revenue in January 2025 having spent the previous year and a half as Health New Zealand's Chief Transformation Officer.

Prior to this, Patrick was with IR for over 9 years and was instrumental in the success of their Business Transformation. He led the end-to-end design of all components of the transformation program, including technology and designing the organisation to take best advantage of the new digital capabilities available. He led a large and diverse team, covering all aspects across both Technology design and Business Architecture.

Patrick is currently focussed on establishing a team that will allow both IR and the broader New Zealand public sector take full advantage of the excellent data and digital assets available across the system.

Speakers Bio



Ms Jenny Wong

With over 25 years experience in the Big 4 accounting firms, Jenny is currently CPA Australia's Tax Lead in Policy and Advocacy. CPA Australia is Australia's leading professional accounting body and one of the largest in the world, representing the diverse interests of more than 173,000 members in over 100 countries and regions. Jenny's role is to be responsible for developing and executing CPA Australia's policy and advocacy priorities in tax in the interests of CPA Australia's members, the profession and the public interest.

Jenny is also the current CPA representative and Co-Chair with the ATO's Second Commissioner of the key ATO stewardship group, the National Tax Liaison Group that addresses issues systemic in the tax system with the aim of improving the client experience and administration of Australia's tax, super and registry systems.

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ABOUT TAX ACADEMY OF SINGAPORE (TA)

TA is a not-for-profit institution established by the Inland Revenue Authority of Singapore in collaboration with international accounting firms (Deloitte, EY, KPMG and PwC), the Singapore Chartered Tax Professionals, the Institute of Singapore Chartered Accountants and the Law Society of Singapore. Our mission is to raise the professional competency of the tax community and develop Singapore's standing as a leading centre for taxation and regional tax knowledge hub.

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