



International Fiscal Association  
Malaysia Branch

## Global Minimum Tax and Digitalization: Navigating the Future Fiscal Landscape

In a rapidly evolving global and digital economy, understanding the intricacies of international taxation is more critical than ever before. The OECD's Pillar 2 is a landmark framework that is set to redefine the global tax landscape, establishing a global minimum tax rate for multinational corporations to prevent the shifting of profits to low-tax jurisdictions, while digital technologies have transformed the way businesses operate and challenged the traditional tax infrastructure.

In Malaysia, the recent Budget announcement on 13 October 2023 affirmed the government's commitment to implement the global minimum tax by 2025, joining other major economies in the region that are also implementing the minimum tax regime: Japan, Korea and New Zealand are well on their way to implementing the income inclusion rule as early as 1 January 2024, Australia has announced its global minimum tax and income inclusion rule will take effect from 2024 while Indonesia, Singapore and Thailand have also committed to the global minimum tax, mostly in 2025.

On the digital front, while innovations in blockchain technology and digital assets continue to evolve, the taxation of such assets and transactions is also quickly catching up, and the focus is turning to digital services infrastructure and on digitalising the tax administration to increase efficiency, transparency and taxpayer compliance. E-invoicing is increasingly being adopted by tax administrators around the world, including in Malaysia where it is set to commence in August 2024. Efforts are also being made to facilitate the exchange of information in relation to digital assets and cryptocurrency, such as the OECD's Crypto-Asset Reporting Framework (CARF) which will be adopted by EU member states in January 2026 and the DAC8 which is an EU directive on the reporting and exchange of information for tax purposes on e-money and cryptoassets.

Join us for a special year-end event as we speak with leading experts on the far-reaching impact of these impending changes for businesses across the region, and how jurisdictions around the world are shaping their tax policies and tax administrations to adapt to future challenges and harness the use of technology.

Whether you're a tax practitioner, accountant, economist or business leader, this event promises to provide valuable insights into some of the most significant developments in international taxation to date.

[REGISTER](#)

Date	24 November 2023
Time	14:00 pm (Kuala Lumpur)
Location	Online

## Programme

---

2.00 pm Registration and Welcome

---

2.15 pm Fireside chat: *Tax Certainty Amidst Revolutionary Changes*

Chair:

**Rachel Saw**

*IFA Malaysia Chair, Head of IBFD Asia-Pacific*

Guest speaker:

**Puan Anis Sabirin Jaapar**

*Director of Tax Certainty and Mutual Agreement Division*

*Department of International Taxation*

*Inland Revenue Board of Malaysia*

---

2.45 pm Roundtable: *Navigating the Future Fiscal Landscape: Business Challenges*

- the state of global minimum tax implementation
- latest in taxation of digital/crypto assets, Crypto-Asset Reporting Framework (CARF)
- digitalization of tax obligations and tax administrations, e-invoicing
- other international tax developments (including from the UN)

Chair:

**Aurobindo Ponniah**, PwC Malaysia

Panelists:

**Rachel Saw**, Head of IBFD Asia-Pacific

**Ichwan Sukardi**, RSM Indonesia

**Avier Teo**, Regional Bank, Singapore

**Tom Toryanik**, Tax Partner, Singapore

**Dr Veerinderjeet Singh**, Tricor Malaysia

---

4.30 pm Close

---

[\*\*REGISTER\*\*](#)

## Moderators

---

### ***Rachel Saw***

**Head, IBFD Asia-Pacific Office, Kuala Lumpur  
IFA Malaysia Chair**



Rachel is the Head of IBFD's Asia Pacific Office which is located in Kuala Lumpur, Malaysia. Rachel has extensive experience in dealing with cross-border tax issues from both a tax administration and tax policy perspective. Her work and expertise are currently focused on the region, with particular attention to the challenges faced by developing countries in today's tax environment.

Rachel regularly teaches in IBFD's International Tax Training courses and for the Malaysian Tax Academy and has also been an instructor for the Asian Development Bank, the OECD and on technical assistance programmes in Cambodia, Hong Kong and Myanmar. She is also the Chair of IFA Malaysia and a prominent speaker in regional circles.

### ***Aurobindo Ponniah***

**Executive Director, PwC Malaysia, Kuala Lumpur**



Aurobindo is an Executive Director of PwC Malaysia, and has over 20 years' experience in tax consulting, research, training and documentation. He has worked extensively with tax authorities in the Asia-Pacific region and corporate organisations on various issues involving tax treaties, permanent establishments, financial instruments, cross border transactions, hybrid structures and anti-abuse provisions.

He is a member of CTIM and an Executive Committee member of IFA Malaysia. He is also a frequent speaker at seminars and conferences.

## Guest speaker

---

### ***Anis Sabirin binti Jaapar***

**Director of Tax Certainty and Mutual Agreement Division  
Department of International Taxation  
Inland Revenue Board of Malaysia**



Anis Sabirin binti Jaapar is currently the Director of Tax Certainty and Mutual Agreement Division, Department of International Taxation, Inland Revenue Board of Malaysia (IRBM). She has served in IRBM since 1997 in various departments and branches including the Chief Executive Officer's Office, the International Taxation Department, the Taxation Policy Department, the Seremban Branch, the Duta Branch and the Shah Alam Branch.

In 2017/2018, she was appointed as Secretariat to the Forum on the Harmful Tax Practices (FTHP) for the International Temporary Settlement Program (PESAT) in OECD, Paris for one year. She is also involved as a Meeting Member for the Task Force on the Digital Economy (TFDE), Working Party 10 and Working Party 11, BEPS Action 1 on the Two-Pillar Approach as well as Project Leader for Project BEPS 2.0.

She is also the Competent Authority (CA) of IRBM that interacts with CAs of treaty partners to resolve international tax disputes involving double taxation and leads the negotiation of advance pricing arrangement (APA) and mutual agreement procedure (MAP) cases with CAs of treaty partners.

Having more than 25 years of experience in taxation activities makes her an expert in handling views and providing advisory services on local and international taxation issues. She holds a Masters degree in Forensic Accounting and Financial Criminology from University Technology MARA (UiTM).

## Panelists

---

### ***Ichwan Sukardi***

#### **Managing Partner & Head of Tax, RSM Indonesia**

---



Ichwan is a Managing Partner and Head of Tax in RSM Indonesia with more than 25 years of experience. He spent much of his career in a Big Four public accounting firm and also worked in the largest oil and gas listed company in IDX in 2012-2015. He provides tax advisory to a wide range of multinational and domestic companies and is experienced in a range of international tax issues, including tax treaties, international transfer pricing, tax structuring and international tax planning.

Ichwan is recognized as one of Indonesia's leading tax advisers in the energy sectors. He is the engagement partner for leading international oil and gas, mining and other energy clients in relation to tax advisory, restructuring, tax disputes and other strategic advice. He led the global re-structuring project of some energy companies' operations with the aim to achieve the most efficient tax structure for dividend distribution, financing, operation and exit strategy. He also led several high-profile M&As for Indonesian energy companies in various regions. Ichwan is also the lead engagement partner for digital and telecom companies, representing them in M&As, tax disputes and tax structuring.

Ichwan is the chair of IFA Indonesia branch, and Vice-chair of the IFA Asia Pacific regional committee. He is a registered tax consultant, and also a licensed Advocaat issued by the Indonesian Bar Association (Peradi), and a registered tax attorney at the Indonesian Tax Court. He regularly speaks in international tax seminars on cross-border tax issues and is a regular contributor on taxation issues in magazines, newspapers, and other tax publications.

### ***Avier Teo***

#### **Regional Bank in Singapore**

---



Avier is a Chartered Accountant (ISCA) and Accredited Tax Advisor (Income Tax and GST) SCTP by training. He has over 17 years of tax experience accumulated from big 4 audit firms and two international banks.

His qualifications include: Master of Taxation, Singapore University of Social Sciences; Bachelor of Accountancy (Distinction), Royal Melbourne institute of Technology University; co-author for the Singapore chapter - Transfer Pricing & Intra-Group Financing published by IBFD; Qualified Person Responsible for Training (QPRT), ICAEW.

### ***Tom Toryanik***

#### **Tax Partner, Singapore**

---



Tom is a financial services tax partner based in Singapore with a Big 4 accounting firm.

He has over 20 years of professional experience in taxation of banking and capital markets as well as international taxation. In addition, Tom is also a Singapore accredited tax advisor.

He holds a master's degree in International Tax Law from the University of Sydney. Tom also teaches regularly on international tax courses for industry professionals, tax authorities and other stakeholders.

**Non-Executive Chairman, Tricor Malaysia**



Dr Veerinder is the Non-Executive Chairman of Tricor Malaysia.

He has been a tax partner in leading international accounting firms and has worked with the Inland Revenue Board of Malaysia. He is a member of the Chartered Tax Institute of Malaysia where he served as President from 2007 to 2010, the Malaysian Institute of Accountant (MIA) where he served as President from 2020 to 2022, the Malaysian Institute of Certified Public Accountants (MICPA) where he served as President for 3 years from 2019 to 2022, the Global Tax Commission of the International Chamber of Commerce (ICC) based in Paris and the Taxand Global Board. He was appointed by the Malaysian Minister of Finance to be part of the Tax Reform Committee in 2018-2020 and is also on the Board of Trustees at the IBFD. He is now a Vice Chair of the ICC's Global Tax Commission.

He serves as an Independent Director on the Boards of UMW Holdings Bhd, Ambank (M) Bhd and Malaysian Rating Corporation Bhd where he is the Audit Committee Chairman on all the entities. He was Past Chair of IFA Malaysia and is currently an Executive Committee member. He is also an Adjunct Professor at the Monash Business School, Monash University, Malaysia and Non-Resident Senior Fellow at the Malaysian Institute of Economic Research.