

International tax – Our service offerings

Cross border transactions/ investments

India/ overseas entry strategy – form of business presence, investment structure etc

Structuring cross border acquisition/ sale of shares/ business

Advising on place of effective management and other substance requirements for establishing residence

Capital flows

Cross border financing – Advising on capital structure taking into consideration tax and regulatory provisions and the commercial end-use

Profit repatriation strategies

Rationalizing group/ operating structure

Cross border mergers – advisory and implementation

Legal entity rationalization

Business modelling including implementation of tax effective operational models

Tax treaties and BEPS

Advising on international tax issues relating to interpretation of tax treaties such as Permanent Establishment, secondment of employees, foreign tax credits, withholding tax on royalties, Fees for Technical Services etc

Advising on impact analysis and restructuring from the perspective of BEPS Action Plans