

TAXATION

Transfer Pricing

We are advisors to a large telecom solutions provider for formulating their transfer pricing policy in India and successfully defending the same before the tax authorities.

International Taxation

- We assisted a large Japanese corporation, acting as lead partner of a consortium, in finalisation of contract structure with the local power board in India. Being an EPC contractor, our clients sought key inputs on tax implications at the bidding stage and also involved us at the time of negotiating the final contract terms with the power board. The contract split was decided in accordance with our advice and was also replicated by the local power board in execution of other similar contracts with international EPC contractors.
- We have also assisted a Canadian company engaged into manufacture and assembly of Rolling Stock in their bidding process with a regional Metro Rail Corporation. The scope of work included critical advice on consortium taxation and consequent structuring of contracts. The company had also engaged us in relation to transfer pricing advisory and documentation on complex transactions involving managerial services and cost contribution arrangements.
- We assisted a UK company, which was an OEM supplier of parts and assemblies to Oil and Natural Gas Corporation Limited (ONGC), in successfully representing a lower tax withholding certificate before the Indian Income tax authorities.

Expatriate Taxation

We have been assisting a large Japanese corporation engaged in manufacturing and marketing of high-end electronics equipment, in meeting their expatriate compliances in India, including salary structure, social security requirements and time to time advice on effective utilisation of double tax avoidance agreements.

Corporate Tax & Advisory

We are corporate tax advisors to a Malaysia based group engaged in the construction of roads and highways in India. Our scope involves planning, preparations and advisory on all corporate tax filing as equally representing all past and present litigations before various levels of appellate bodies.