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# Legal and Compliance News

Abolition of Foreign Investment Promotion Board (FIPB)

FIPB was an inter-ministerial body housed in the Department of Economic Affairs in the Finance Ministry responsible for processing Foreign Direct Investment (FDI) proposals requiring Government approval.

The Finance Minister in his budget speech on February 1 had announced scrapping of FIPB. In respect of the announcement so made with a view to ease the process of doing business in India, the Government has abolished the 25 year old Foreign Investment Promotion Board (FIPB) vide office memorandum dated 5th June, 2017 issued by Ministry of Finance, Department of Economic Affairs.

Subsequent to the abolition of FIPB, the work of granting Government approval for foreign investment under the extant FDI policy and FEMA regulations shall entrusted the concerned Ministries/Departments and in some cases to Department of Industrial Policy and Promotion (DIPP), Ministry of Home Affairs, Ministry of Finance and Department of Economic Affairs. A Standard Operating Procedure (SOP) with detailed guidelines shall be developed so as to guide the Administrative Ministries/Departments for processing of the FDI proposals and ensure a consistency of treatment and uniformity of approach across sectors.

Now timelines will be fixed for approving applications regarding FDI by competent authorities and a rejection by the department concerned has been made difficult as it will now mandatorily require concurrence of DIPP.

# Rights of Persons with Disabilities Act, 2016 extends to Private companies

India being signatory to United Nations Conventions on the Rights of Persons with Disabilities, India has an international obligation to comply with the provisions of the Convention. Therefore, with a view to give effect to the Convention matters India has recently notified the Rights of Person with Disabilities Act, 2016.

A few of the key features of the Disability law includes :

- The number of disabilities recognised under the law has been increased from 7 to 21 and includes blood disorders, intellectual disability, disability caused due to neurological conditions, acid attack, Parkinson's disease etc. Speech and Language Disability and Specific Learning Disability have been added for the first time.
- Additional benefits have been provided for persons with benchmark disabilities and those with high support needs. Persons with "benchmark disabilities" are defined as those certified to have at least 40 percent of the disabilities specified in the Act.
- It is mandatory on every private establishment to frame an equal opportunity policy. The policy will have to be published on the employer's website, failing which; the same shall be displayed at conspicuous places of the establishment premise.
- Every private establishment having 20 or more employees shall maintain records containing details of the disabled persons who are employed at the establishment.
- Private establishments having more than 20 employees are required to appoint a liaison officer to oversee the recruitment of disabled persons and make the necessary provisions and facilities for such employees in the establishment.

- No person shall be subject to discrimination on the ground of disability, unless it is shown that the impugned act or omission is a proportionate means of achieving a legitimate aim.
- The Act stipulates constituting of special courts in each district to handle cases concerning violation of rights of persons with disabilities.
- Non-compliance of the provisions invites penalty

   fine up to INR 500,000 and/or imprisonment extending up to 5 years.

# Enforcement of Employee's Compensation (Amendment) Act , 2017

The Indian Government has notified the Employee's Compensation (Amendment) act, 2017 effective from 12<sup>th</sup> May 2017. Following are the key takeaways:

- The amendment has imposed additional duty upon the employer to inform his employees his rights to compensation under the Act in writing as well as through electronic means in English or Hindi or in the official language of the area of Employment, as may be understood by the employee.
- Failure on the part of the employer to comply with this duty will invite a penalty upon himself as prescribed under section 18-A.
- As per the amendment, the penalty amount has been increased from a maximum of INR 5,000 to a definite penalty of INR 50,000 which may be further extended to INR 100,000.
- Under the Act the every employee (including those employed through a contractor but excluding casual employees) who is engaged for the purposes of employer's business and who suffers an injury caused by accident is entitled to receive compensation under the Act if the accident arose out of and in the course of his employment, resulting into:

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- Death
- 2. Permanent total disablement
- 3. Permanent partial disablement
- Temporary disablement whether total or partial
- On having contracted an occupational disease
- CS Compliances for Private Limited Companies and Liaison office/Branch office/Project office (LO/BO/PO) in the third quarter of financial year

Sr. No	Particulars	Last due date 2017			
Α	Compliances applicable on a private limited company				
İ	Filing statement of foreign liabilities and assets (FLA) with Reserve Bank of India	15 <sup>th</sup> July			
ii	Hold a second board meeting of the financial year 2017 - 18.  Make sure that the gap between two board meetings i.e., in this case current year's first board meeting and second board meeting, must not be more than 120 days.	30 <sup>th</sup> Sep			
iii	Hold the Annual General Meeting for the year ended March, 2017	30 <sup>th</sup> Sep			
В	Compliances applicable on a Liaison office/Branch office/Project office				
i	Filing of annual accounts with Registrar of Companies in e-form FC-3.	30 <sup>th</sup> Sep			
ii	Reporting to Director General of Police (DGP), if applicable	30 <sup>th</sup> Sep			
iii	Filing of Annual Activity Certificate along with audited financials to Authorised Dealer Bank	30 <sup>th</sup> Sep			
lv	Filing of Annual Activity Certificate along with audited financials to Director General of Income Tax (International Taxation), Delhi, if applicable	30 <sup>th</sup> Sep			

## Tax News

## > Transfer Pricing

# India introduces Safe Harbour Rules for Low Value Adding Intra-group Services

Intra-group services are often subject matter of dispute in India. To streamline the whole issue, Central Board of Direct Taxes of India (CBDT) vide notification No 46 dated 7<sup>th</sup> June, 2017 has issued revised Safe Harbour Rules to rationalise prevailing safe harbour margins and to broaden the horizon of safe harbour by adding a new category of inbound low value-added intra-group services.

Accordingly, foreign associated enterprise shall apply a mark-up not exceeding 5 percent to the intragroup costs. The threshold limit for applicability of this safe harbour is where the intra-group costs charged are up to INR 100 million in a financial year.

The definition of low value adding intra-group services is largely in line with OECD BEPS Action 8-10 guidelines, except that it has one more criteria for application of the safe harbour, viz., where there is a lack of reliable external comparable services which can be used for determining the ALP. Further, there is no major variation in the list of services to be excluded from the purview of low value adding intragroup services and the documentation to be maintained by the foreign associated enterprise in relation to the low value adding intragroup services.

However, it should be noted that although no detailed documentation needs to be maintained for the mark-up charged by the foreign AE, the cost base of the foreign AE allocated to the Indian associated enterprise would need to be certified by an accountant. An accountant, in this case, means, an Indian Practicing Chartered Accountant including

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any person recognised for undertaking cost certification by the government of the country where the foreign AE is registered or incorporated, who fulfils certain prescribed conditions. Such certificate from an Accountant is required regarding the method of cost pooling, exclusion of shareholder costs and duplicate costs from the cost pool and the reasonableness of the allocation keys used for allocation of costs to the Indian company by the foreign AE.

Overall, the safe harbour rules for Low Value Adding Intra-group Services have been prepared based on the lines of "elective, simplified approach adopted by OECD BEPS Action 10".

# India Notifies Rules for computation of interest income pursuant to secondary adjustment

The Finance Act 2017 introduced the concept of "Secondary Adjustment" through insertion of new section 92CE Income Tax Act. However, section was silent on certain issues, viz., manner of interest calculation, rate of interest, etc. Accordingly, CBDT vide notification no 52 dated 15<sup>th</sup> June, 2017, has introduced Rule 10CB in relation to the secondary adjustment which prescribe the time limit for repatriation of excess money and methodology for computation of interest income.

The notification has also clarified that provisions relating to secondary adjustments shall be applicable to primary adjustments exceeding INR 10 million made in respect of financial year 2016-17 and onwards.

According to the notification, associated enterprise should repatriate the excess money within the time lime of 90 days from the due date of filing of return (i.e. 30th November) under section 139(1) of the Act i.e.28th February). In case of tax audits where the assesse accepts the primary adjustment, the time limit for the repatriation of excess money is 90 days from the date of assessment/appellate order.

Where the excess money is not repatriated within the time limit, the annual interest shall be computed as follows.

Particulars	Interest	
Where international transaction is in INR	1 year Marginal Cost of Fund Lending Rate (MCLR) of State Bank of India* as on 1st of April of the relevant previous year plus 325 basis points	
Where international transaction is in foreign currency	6 months London Interbank Offered Rate (LIBOR) as on 30th September of the relevant previous year plus 300 basis points	

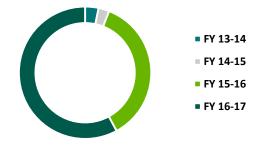
<sup>\*</sup> SBI MCLR as of 1st April 2016 is 920 basis points.

# Annual Report on APA programme of India, released by CBDT

CBDT has issued an annual report for its Advance Pricing Agreement (APA) Programme in India. The report indicates that APA Programme has matured over the past five years and number of agreements getting signed is testimony to that. The APA programme is indeed a great achievement, since complex transfer pricing issues which were subject matter of long lasting litigations are increasingly resolved through APAs.

This Annual Report condenses the first five years of the programme (1st July, 2012 to 31st March, 2017) with a statistical analysis of applications filled, applications under process, agreements signed, processing time, countries covered, industry-wise coverage, nature of transactions, methods adopted, etc., within each categories of unilateral and multilateral APA's.

Till 31st March, 2017, 152 agreements have been entered into (141 unilateral and 11 bilateral).



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Out of the 141 unilateral APA's have been signed with taxpayers, majority of them being covered in the Information Technology and Banking & Finance services. Also, Transactional Net Margin Method (TNMM) has been the preferred method being used in such APA's.

While in respect of Bilateral APA's, 11 agreements have been signed with the taxpayers engaged in general trading, automobile and telecommunication industry, and further similar to unilateral APA's, TNMM has been the retained as preferred method being used. Of the 11 Bilateral APAs signed, six of them are with U.K. and five with Japan.

For detailed analysis, please refer the report titled 'Advance Pricing Agreement (APA) Programme of India – Annual Report (2016-17)' published by CBDT in April, 2017.

# Revision in APA application form, requiring more details on AEs & parent companies

Central Board of Direct Taxes (CBDT) has notified amendments to clauses 3 and 4 of Form No. 3CED (Application for an Advance Pricing Agreement) vide notification no 53 dated 16<sup>th</sup> June, 2017.

In addition to name and country of Associated Enterprise (AE) with whom the APA is requested for, taxpayers shall now be required to specify following details in respect of the Associated Enterprises, immediate parent company and ultimate parent company:

- a. Name
- b. Address
- c. Country of residence and
- d. Unique identification number issued by Govt. of the country where AE is located.

## Direct and International Taxation

# > India signs the Multilateral Instrument

In a historic development, India signed the Multilateral Instrument (Convention) on 7<sup>th</sup> June, 2017 along with over 65 countries as a measure to plug tax avoidance and curb revenue loss through profit shifting strategies.

Signing of the Multilateral Instrument has the impact of modifying India's existing bilateral treaties.

The Convention is a part of the Base Erosion Profit Shifting (BEPS) Project of the Organization of Economic Co-operation and Development (OECD) [Action Plan 15] and is a complex document consisting of 39 Articles.

The First Joint Signing Ceremony was held on 7th June 2017 at Paris wherein, India and other participant countries signed the Convention and also released a list of tax treaties sought to be covered by the Convention (Covered Tax Agreements (CTA)) as well as specific reservations to Articles of the Convention (if any).

It is contemplated that the Convention will be applied alongside existing tax treaties.

Interestingly, India has notified all its tax treaties (93) as CTAs, while some countries like Germany and China have not notified India as a Covered Tax Agreement.

The Convention comes into force only after completion of internal procedures for ratification and implementation by **both** countries.

Going forward, key Articles of the Convention likely to impact existing and new businesses in India *interalia* include the following:

- Updated definition of Permanent Establishment, i.e. Definition of Agency PE, specific activity exemptions (for preparatory and auxiliary activities), Splitting up of contracts
- Prevention of treaty abuse (anti-avoidance measures like limitation of benefits)
- Corresponding adjustments (transfer pricing)

# Revised norms for Valuation of unquoted shares

Finance Act 2017 inserted new section 50CA in the Income Tax Act effective AY 2018-19 which provides that when unquoted equity shares are transferred at less than Fair Market Value (FMV), their value shall be determined in the prescribed manner.

The value (or FMV) so determined will be deemed to be the full value of consideration for computing 'Capital Gains' in case of such unquoted equity shares.

For the purpose of this section, the CBDT had earlier released Draft Rules for Valuation of Unquoted equity shares for stakeholders' comments on May 5<sup>th</sup> 2017. These Rules have now been notified vide Notification No. 61/2017 dated 12<sup>th</sup> July 2017.

As per the new Rules, FMV of unquoted equity shares will be the value as on the valuation date determined in the following manner:

FMV = (A + B + C + D - L) X PV/PE where

- A. Jewellery and artistic work price when sold in the open market (market price) on the basis of valuation report obtained from a registered valuer
- B. Shares and securities Fair Market Value
- C. Immoveable Property Value adopted for stamp duty purposes
- D. Other assets Book Value of assets in the Balance Sheet as reduced by (i) Income tax paid less refund claimed (if any)] and (ii) amount of unamortised deferred expenditure
- L. Book value of Liabilities as shown in the Balance Sheet less amounts specified in the Rule, such as unascertained liabilities, contingent liabilities, provision for taxation etc.

PV = Paid up value of such equity shares

PE = Total paid up equity share capital

In substance, the value of unquoted shares is proposed to be determined on the basis of Book Value of assets with market value substituted for values of immoveable properties, shares and securities and jewellery.

It has been further clarified that the valuation date shall mean the date on which the capital asset, i.e. unquoted shares is transferred.

# > Procedural Aspects

Initiatives to improve ease of doing business in India:

- CBDT has tied up with Ministry of Corporate Affairs ('MCA') to issue Permanent Account Number ('PAN') and Tax Deduction Account Number ('TAN') in 1 day; Digitally signed Electronic PAN Card (E-PAN) introduced (in addition to physical PAN card) which can be submitted as proof of identity,
- Procedures for paperless assessments have been streamlined; all notices, questionnaires, orders visible to taxpayers under "E-Proceeding" tab in the e-filing website:

https://incometaxindiaefiing.gov.in after logging into their respective accounts.

The Supreme Court of India (SC) upheld the constitutional validity of section 139AA(1) of ITA, introduced by Finance Act 2017, which mandated quoting of Aadhaar/Enrollment ID of Aadhaar application form, for applying for PAN and filing a return of income in India with effect from 1st July 2017. However, in a welcome move and to provide relief to non-residents individuals, the Government of India vide Press Release dated 12th May 2017 exempted class of tax payers from complying with this provision to inter-alia include non-residents and Individuals who are not citizens of India.

CBDT has recently amended the date of furnishing the Form 16 (summary of salary paid and TDS thereon) to the employees by the employer from 31<sup>st</sup> May to 15<sup>th</sup> June of the following financial year.

The Government of India vide Finance Act, 2017 had introduced section 194-IB wherein it was made obligatory on an individual or a Hindu Undivided Family to deduct TDS @ 5 % on rent payment exceeding INR 50,000 in a month or a part of the month.

Subsequently, the CBDT vide notification no. G.S.R. 561(E), dated 8<sup>th</sup> June, 2017 introduced the rules which provide for the time-limit within which the TDS is to be deposited with the government, the challan form for TDS deduction, and the format of the certificate of TDS deduction to be issued by the deductor (tenant/lessee/payer) to the deductee (Landlord/lessor/payee).

# CBDT notifies genuine cases for 'nil' capital gains when no STT is paid

No tax is required to be paid on Long term capital gains (LTCG) arising from transfer of equity shares or units of equity oriented funds on which Securities Transactions Tax (STT) is paid at the time of transfer [Section 10(38) of the ITA].

Finance Act 2017 amended the above provision with effect from FY 2017-18 to stipulate that such exemption would be available only in cases where acquisition of shares was also chargeable to STT.

This was done in order to curb the practice of unaccounted income being declared as exempt long-term capital gains by entering into sham transactions. In April 2017, the CBDT had issued draft notification for public comments proposing to notify genuine transactions wherein pre-condition of applicability of STT at the time of acquisition would not apply.

In this connection, on 5<sup>th</sup> June 2017, CBDT has issued a final notification No.43/2017, prescribing negative list of transactions of acquisition in respect of which exemption under section 10(38) ITA would not be available. However, along with the negative list, the notification also provides exclusions to insulate genuine acquisitions in which cases the exemption will continue to be available. The exclusions will cover inter-alia transactions of non-residents in accordance with applicable foreign direct investment guidelines, acquisitions under ESOP schemes, acquisitions approved by courts etc.

# Supreme Court verdict: Formula One race circuit constitutes Fixed Place PE in India

Recently, the Hon'ble Supreme Court of India in the case of Formula One World Championship Ltd (FOWC) held that, Buddh International Circuit (Circuit), where the commercial/economic activity of conducting Formula One Championship event was carried out, constitutes a "Fixed Place Permanent Establishment (PE) of FOWC in India under the India-UK tax treaty.

Despite the fact that racing event lasted only for a few days, the SC stated that all three characteristics of a PE i.e. stability, productivity and dependence was present in this case. The SC unequivocally endorsed principle of substance over form by doing collective reading of agreements entered by FOWC and its affiliates in order to hold that entire event in reality was managed and controlled by FOWC.

This judgement will have far-reaching ramifications, since it has given new dimensions for determining the PE exposure in India, particularly in cases where the operations in India last only for a short duration. In such cases foreign entities operating in India would now need to ascertain their taxable presence and potential tax liabilities in India.

#### **Indirect Taxes**

- > Brief overview on implementation of Goods and Services Tax (GST) in India
- The GST regime was introduced with effect from 1st July 2017 subsuming several existing indirect taxes such as Central Excise, Service Tax, VAT/CST and Additional duties on Customs.
- The Government has categorized various goods and services under separate GST rate schedules of 0, 5, 12, 18 and 28 percent. Most of the goods and services have been categorized under the 18 percent bracket. Exports and supplies to SEZ units continue to be "Zero Rated".

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- Important updates post GST implementation
- Common portal notified: As per Notification No. 4/2017 Central Tax, dated 19th June 2017 the Central Government has notified "www.gst.gov.in" as the Common Goods and Services Tax Electronic Portal for facilitating registration, payment of tax, furnishing of returns, computation and settlement of integrated tax and electronic way bill. Though the portal is not fully functional, it is expected to act as a facilitator for the tax payer significantly reducing the physical interaction with the tax authorities.
- State-border check-posts to discontinued: The logistics and transportation sector has immensely benefitted under GST as all State Governments have discontinued with the state border check posts. By estimates, this has resulted in reduction of transport time by around 30 percent. Instead of stopping trucks at the check posts for verification, mobile squads of officers have been formed who would undertake verification based on intelligence and other risk based parameters.
- E-way bills: The draft E-way Bill Rules notified have been deferred by the Government until readiness of required IT infrastructure. Till such time, it has been decided that State Governments would issue rules related to such documentation required during carriage. States like Karnataka, Gujarat, Bihar etc. have already notified the revised rules.
- Relaxation for 2 months in return filing under GST: As a taxpayer facilitation measure, the Government has decided to provide additional time for the compliance requirement for the month of July and August 2017. The taxpayers would be required to file a simple return (Form GSTR- 3B) by 20<sup>th</sup> of the subsequent month containing a summary of outward and inward supplies instead of invoice level information. The revised timelines for filing invoice level information for July and August 2017 would be as follows:

Month	GSTR- 3B and payment	GSTR-1	GSTR-2 (auto populated)
July 2017	20 August 2017	1st -5th September 2017	6th-10th September 2017
August 2017	20 September 2017	16th- 20th September 2017	21st-25th September 2017

- Filing of Letter of Undertaking (LUT)/Bond for export of goods and services: The Government has released several Notifications and Circulars regarding procedure for undertaking export of goods/services or supply of goods/services to SEZ units without payment of IGST. As per the procedure, in case of export of goods or services without payment of IGST, the exporter would be required to file a Bond (including Bank Guarantee) or LUT before undertaking the exports. Following persons are allowed to furnish LUT instead of a Bond (with Bank Guarantee):
- ✓ Status holders
- Persons receiving consideration amounting to 10 percent of the export turnover, in case it is more than INR 10 Million.
- This is a significant inconvenience specially to smaller service exporters who were not required to follow such procedures earlier.
- Sealing of containers for exports: The procedure relating to factory stuffing carried out under the supervision of the Officers in case of exports has been simplified for GST registered entities by allowing self-sealing of containers. The revised procedure shall be effective from 1st September 2017. The erstwhile ARE-1 procedure under the Excise regulations for export of goods has been dispensed with.

# Accounting/Audit

# Amendments to the Clause (i) of Section 143(3) of the Companies Act, 2013 – Powers and duties of auditors and auditing standards

The Ministry of Corporate Affairs (MCA) has issued the notification dated 13<sup>th</sup> June 2017 amending the Clause (i) of Section 143(3) of the Companies Act, 2013. Earlier the provisions of the Act required the auditor to state in his audit report whether the company has adequate internal financial control systems in place and the operating effectiveness of such controls.

The notification now exempts private companies from the above stated provision if such company:

- is a one person company or small company; or
- has a turnover less than INR 500 Million as per the latest audited financial statement or which has aggregate borrowings from banks or financial institutions or any body corporate at any point of time during the financial year less than INR 250 Million;

Hence, internal financial reporting is not required by these companies henceforth subject to the fact that the company has not committed any default in filing its financial statements or annual return with the registrar of companies.

# Accounts and records to be maintained under GST regime

The Central Goods and Services Tax Act, 2017 specifies the following accounts and records to be maintained by each registered person:

- register for production or manufacture of goods
- register for inward and outward supply of goods or services or both
- 3. register for stock of goods
- 4. register for input tax credit availed
- 5. register for output tax payable and paid
- other records as may be specifically prescribed by the government

Such records can be maintained in electronic form.

In cases where more than one place of business exists such records will have to be maintained for each place of business.

The Act requires all records to be retained for a period of 72 months from the due date of filing Annual return for the relevant year.

#### Roadmap to IND AS - Phase 2

The Ministry of Corporate Affairs had issued a phase-wise roadmap for adoption and applicability of the 39 Indian Accounting Standards (IND AS) issued for companies other than Banking, Insurance and NBFC Companies.

Under Phase II of the roadmap it is mandatory for the following companies to comply with IND AS for the accounting periods beginning on or after 1st April 2017:

- Companies listed/in process of listing on stock exchanges in India or outside India having net worth of less than INR 5 Billion;
- Unlisted companies having net worth of ≥ INR
   2.5 Billion but ≤ INR 5 Billion;
- 3. Holding, subsidiary, associate and JV of above.

Thus, from April 2017 onwards after the implementation of Phase I & II, IND AS shall apply to all listed companies irrespective of their net worth whereas the unlisted companies shall be required to comply with IND AS only if their net worth is equal to or exceeding INR 2.5 Billion. If any company meets the above threshold for the first time as on 31st March 2018 then the IND AS shall apply to them from financial year 2018-19 onwards.

The companies which are not required to follow IND AS for preparation of their financial statements shall comply with the accounting standards (AS) as specified in the Companies (Accounting Standards) Rules, 2006 read with the recently issued Companies (Accounting Standards) Rules, 2016. The Companies (Accounting Standards) Rules, 2016 have amended the following Accounting Standards:

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- Accounting Standards (AS) 2 Valuation of Inventories
- 2. Accounting Standards (AS) 4 Contingencies and events Occurring after Balance Sheet Date
- 3. Accounting Standards (AS) 10 Property, Plant and Equipment
- 4. Accounting Standards (AS) 13 Accounting for Investments
- 5. Accounting Standards (AS) 14 Accounting for Amalgamation
- 6. Accounting Standards (AS) 21 Consolidated Financial Statements
- 7. Accounting Standards (AS) 29 Provisions, Contingent Liabilities and Contingent Assets

Further Accounting Standard 6 on Depreciation Accounting, is omitted.

However, it is imperative to note that entities other than corporates such as partnership firms etc. would need to continue to comply with the Accounting Standards issued by the Institute of Chartered Accountants of India (ICAI).

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# **Upcoming Events/Publications**

Here you will find a selection of our events, where you will get our first-hand expertise:

Please read more about the following topics on our Rödl & Partner Website:

#### 3 Monate Goods and Services Tax – Erste Erfahrungen mit Indiens großer Umsatzsteuerreform

Speakers: Tillmann Ruppert

Dr. Heidi Friedrich-Vache

Organiser: Rödl & Partner, IGCC

Place/Date: Eschborn, 26<sup>th</sup> September 2017

## Rechtliche und steuerliche Rahmenbedingungen im Indien-Geschäft mit Update zur Goods and Services Tax (GST)

Speakers: Seema Bhardwaj
Organiser: IHK Südlicher Oberrhein
Place/Date: Freiburg, 12<sup>th</sup> October 2017

#### > Personalmanagement in Indien

Speakers: Seema Bhardwaj

Nadja Roß-Kirsch

Organiser: ICC Austria

Place/Date: Wien, 17<sup>th</sup> October 2017

#### > Indien - Steuern & Recht

Speakers: Tillmann Ruppert

Seema Bhardwaj

Organiser: ICC Austria

Place/Date: Wien, 18th October 2017

For more information on our events please visit our website:

http://www.roedl.de/unternehmen/standorte/indien/

# Compliance in Indien – Zwingende Herausforderung

http://www.roedl.de/themen/entrepreneur/2017-04/compliance-outsourcing-indien-herausforderung

## Doppelbesteuerungsabkommen Indien

http://www.roedl.de/themen/doppelbesteuerungsabkommen-indien-dtaa

#### Indien: General Anti-Avoidance Rules (GAAR)

http://www.roedl.de/themen/general-anti-avoidance-rules-gaar-indien

#### Erfolgreich investieren in Indien

http://www.roedl.de/themen/internationalisierung/indien

#### Indien unterzeichnet Multilaterales Instrument

http://www.roedl.de/themen/indien-steuern-multilaterales-instrument

#### Indiens neue Goods and Services Tax

http://www.roedl.de/themen/steuer-indien-gst-reform

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# Rödl & Partner Contact in India – We are glad to support you:



**Martin Wörlein**Partner
Head of India Advisory

Rödl & Partner Nürnberg Äußere Sulzbacher Straße 100 90491 Nürnberg

Phone: +49 (911) 91 93 – 30 10 E-Mail: martin.woerlein@roedl.pro



**Rahul Oza**Partner
Head of Pune Office
Head of Mumbai Office

Rödl & Partner Pune 308, Lunkad Sky Vista New Airport Road Pune – 411 014

Phone: +91 (0) 20 66 25 71 00 E-Mail: <u>rahul.oza@roedl.pro</u>



Michael Wekezer Head Delhi Office Associate Partner

Rödl & Partner Delhi Unit No. 4, German Centre 12th Floor, Building 9 B DLF Cyber City, Phase III Gurgaon – 122 002 Haryana

Phone: +91 (124) 4 83 – 75 50 E-Mail: <u>michael.wekezer@roedl.pro</u>

#### Adding value

"India is one of the strongest worldwide growth economies. Seize the opportunity that this enormous market offers. We advise you from a single source on all legal, tax and economic issues relating to your contemplated project or investment."

Rödl & Partner

"The formation of our towers always starts with a solid base; then we move on to building the stable middle and top levels. Only united and with a collaborative effort, are we, people of varied characters, able at all to complete our artistic formations. Once the tower is built, we dare to take a look into what lies ahead."

astellers de Barcelona



ach and every person counts" – to the Castellers and to us

Human towers symbolise in a unique way the Rödl & Partner corporate culture. They personify our philosophy of solidarity, balance, courage and team spirit. They stand for the growth that is based on own resources, the growth which has made Rödl & Partner the company we are today.

"Força, Equilibri, Valor i Seny" (strength, equilibrium, valour and common sense) is the Catalain motor of all Castellers, describing their fundamental values very accurately. It is to our liking and also reflects our mentality. Therefore Rödl & Partner embarked on a collaborative journey with the representatives of this long-standing tradition of human towers—Castellers de Barcelona—in May 2011. The association from Barcelona stands, among many other things, for this intangible cultural heritage.

Imprint: Newsletter India | Issue July 2017

Publisher: Roedl & Partner Consulting Pvt. Ltd.

308, Lunkad Sky Vista New Airport Road Viman Nagar Pune – 411 014

Phone: +91 (0) 20 66 25 71 00 | www.roedl.de

Responsible for the content:

Martin W"orlein - martin.woerlein@roedl.pro

Layout: Natascha Lewandowski –

natascha. lewandowski@roedl.pro

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