

ITRAF Roundtable on Current Matters on Direct and Indirect Taxation in India

30th July 2016

Bangalore, India

Summary Report

Introduction

A Roundtable of *International Tax Research and Analysis Foundation (ITRAF)* was held in Bangalore, India on 30th July 2016, with more than 42 participants representing tax administration, leading multinational corporations, major advisory firms as well as tax professionals, accountants and lawyers.

The ITRAF Roundtable took up emerging issues of Direct and Indirect Taxation. The meeting agenda covered the following issues:

- Risk Based Assessment in India
- Taxation of Dividend Income
- Place of Effective Management (PoEM)
- Limitation of Benefits
- Protecting and Promoting Tax Base, Large Taxpayer Units (LTUs)
- Transfer Pricing- Trends and Recommendations
- Goods and Services Tax (GST)
- International Tax Research: Way Forward

Opening Ceremony

T.V. Mohandas Pai formally opened the meeting with an introduction of ITRAF on 30th July, along with **Dr. Parthasarathi Shome**, Chairman, ITRAF. In his welcome speech, Mohandas Pai gave a brief introduction on ITRAF's objectives to improve the international tax ecosystem in India through in-depth economic and statistical research and analysis as well as ITRAF's unbiased approach to provide meaningful research to enhance tax policy formulation and administration. He spoke about Thought Leadership, which ITRAF provides to ensure tax policies synchronise with changing technology and business landscape, the economic implications of tax policies and the need to ensure that tax policies provide a level playing field for business enterprises undertaking international business in various forms. He discussed the issue of eroding tax base, ease of compliance by taxpayers, and a need to carry out research on these matters, and encouraged participants to participate in tax policy research, analysis and support in conducting research and analysis on important tax matters including those relevant to India.

Dr. Shome welcomed the participants on behalf of ITRAF who made it through the inclement weather and despite the state-wide bandh. He specifically thanked participants based out of Bangalore who had come from Chennai, Delhi and Mumbai, and recognised Mr. Ravinder Saroop, Commissioner-LTU, Mr. Nagendra Kumar, Principal Additional Director General- DGCEI, Bangalore, Mr. Ganapathy Bhat, Commissioner of Income Tax (Transfer Pricing), Bangalore, Mr. M.R. Diwakar (Ex-Member, TARC), Mr. Mukesh Butani (Partner BMR Advisors) and Bhavana Doshi (Adviser, KPMG). He elaborated on ITRAF's Roundtable agenda and the research topics to be discussed on the day. He said ITRAF provides a neutral forum for intense public debates and critical discussion based on its detailed research reports so that technically sound and practical tax policies could be recommended to the appropriate stakeholders. ITRAF should be a forum for policy makers to seek guidance on matters requiring regulatory impact analysis and discussion on the measures to improve the tax environment in India by providing clarity on the intent of regulations, on avoiding litigation, and in bringing about certainty.

Dr. Shome explained ITRAF's collaboration with the International Tax and Investment Center (ITIC), Washington DC, for dissemination of research and its aspiration to play an active role in providing fundamental research such as Brookings Institution, Carnegie Mellon University (CMU), American Enterprise Institute and others. He asked for participation from intellectuals and professionals from manufacturing and services sectors to provide high quality research using ITRAF's forum whereby the government can take up ITRAF's findings and recommendations for high quality policy formulation. He shared his experience as the Advisor to the ex-Finance Minister of India, Chairing tax forums in North Block (Finance Ministry), he always felt the gap in tax policy research to achieve international standards. In his closing remarks he said that taxation is something people get up, and sleep with and people pay taxes from birth to death. He thanked TaxSutra for participating and invited people to come forward and participate in tax policy research and analysis through the ITRAF banner.

Session 1:

Theme 1: Risk Based Assessment in India

S. Krishnan and Padamchand Kincha presented a paper on risk based assessment and its evolution in India. The study focused on some of the modern tax administrations now subscribed to the view that using risk assessment for tax audits is the correct approach, and many have developed audit strategies focusing on taxpayer non-compliance risks. They examined the evolution of risk based assessment process in India, the approach, outcome and the adequacy of the process under various parameters. Risk based tax assessment processes to select assesseees for scrutiny assessment was first introduced in India in 2003 on the basis of Kelkar Committee recommendations. There are presently two types of selection processes for scrutiny, Computer Assisted Selection of cases for Scrutiny (CASS) and Manual Selection of cases for Scrutiny. Further, they also discussed the criteria for manual selection of returns/cases for

scrutiny. They shared their practical experiences with Canada, Australia and United States tax administration and risk based assessment approach in these countries in selection of cases for scrutiny.

They talked about the impact of risk based assessment and discussed the pendency rate in FY 2013-14 in disposal of scrutiny assessments was 59.2 % and that of appeal cases 71 %. The disposal of appeal cases with CIT(A) has come down in FY 2014-15 as compared to FY 2013-14 resulting in increase in pendency. They revealed that while corporate assesses increased by 6.1 per cent between FY 2013-14 and FY 2014-15, almost 34 per cent of working companies did not file their return of income in FY 2014-15. They suggested that if all the non-filers can be brought under tax net, there could be sizeable increase in the I-T Department's revenue and tax department should take it seriously. However, the tax gap is wider in the unorganized sector.

To summarise, the authors discussed shortcomings of risk based assessment in India and recommended measures to resolve them. In India, the focus of the risk based assessment at present is more on the selection of the taxpayer and less on the process of conducting the assessment. They suggested that it would be prudent for the CBDT to significantly increase the threshold limits under the manual selection criteria to prevent the same taxpayers from being subject to scrutiny every year and this shifts their focus on to non-compliant taxpayers thereby achieving equal treatment of taxpayers. They discussed the flaws of CASS system and its failure in selection of tax taxpayers for scrutiny purposes. Authorities do not publish the list of taxpayers chosen for scrutiny on the score based selection and do not disclose the reason for selection, scoring methodology, the score assigned to an assessee based on risk parameters. Whereas, in other countries systems are transparent and provide reason for selection of cases for scrutiny. For example, HMRC assigns Relationship Manager to taxpayers and can be approached by e-mail, HMRC have a system of grading, and audits only high risk assesses. In India, Direct and Indirect Tax Departments do not share information, the score assigned to taxpayers is not known and it's like a complete black-box. The quality of training provided to Assessing Officers is inadequate, no industry specialists are available in I-T Departments and there are no specialized taxpayer units for various industries. There is no well-defined methodology to risk-based assessments in India. The process is evolving and is experimental. The tax authorities in India have not developed a structured process to address and manage tax risks.

Q&A:

1. What should go as guidance from the issue of risk based assessment?
2. There is no information available in public domain how tax administration is selecting cases for scrutiny.
3. Do TARC reports contain cross country analysis of risk based assessment?

Arun Giri from TaxSutra, shared his experience with I-T Department's process of selection of cases for scrutiny. He spoke of how the department conducts risk based assessment for selection of cases for

scrutiny using information technology. He mentioned the notices sent to 7 lakh non-filers for 14 lakh transactions selected for scrutiny. Dr. Shome addressed the issue of non-availability of information in public domain on criteria to pick-up cases for scrutiny and how authorities are selecting cases for scrutiny. He explained, that in India may be the algorithm of CASS is not known to field officers as should be the case. There are mistakes in selection of cases due to wrong simplification of the algorithm which could be the cause of many errors. There is a chance that if for a particular year Foreign Tax Credit is higher, it will be scrutinized but criteria for scrutiny selection should be provided to both officer and taxpayer. Mukesh Butani mentioned the tax barrier concern of Fortune 500 companies.

Theme 2: Taxation of Dividend Income- Issues and Way Forward

Saurav Bhattacharya addressed the issue of Dividend Distribution Tax (DDT). He explained the emerging issue of not taxing dividends in the hands of income earners but as a collection of tax by companies before the distribution of dividend at a lower rate than the income tax rate. Currently, Indian companies are subject to corporate tax rate of 30% and DDT of 20% on dividend distributed. Resident individual, firm, HUF are subject to additional tax of 10% on dividend income in excess of Rs. 1 million.

He discussed the problems with DDT such as DDT compromising horizontal equity since it falls on companies and not partnerships and other businesses. It is a tax on the company and not on the shareholder. The shareholder cannot avail treaty benefit, since dividend is not taxable to shareholder, it results in disallowance of expense to shareholder u/s 14A of I-T Act. It causes cascading over multi-tiered corporate structures. There is no provision for assessment, refund of excess payment, or appeals, and high cost leads to cash hoarding at company level. South Africa moved back to a classical system in 2012 since the dividend tax (STC) was perceived to be creating the impression that South Africa's corporate tax rate was higher than that in its competitor countries. As much of the Indian law reflects South African law, and since 1997 DDT, India exempted dividends in the hands of shareholders and began collecting from companies, it is perceived to be taxed at a shareholder's hand. He mentioned a 2008 Volkswagen case, where it was decided that companies paying STC cannot avail treaty benefit. He recommended the reverting of DDT law, which will be considered as a tax on shareholders which is only discharged by companies. In accordance with a Kelkar Committee recommendation, he not only recommended to revert to the classical system of taxing shareholders on dividend income, but also at a lower rate of 10%, and eventually eliminate the taxation of dividends towards a fully integrated tax system. This will be in line with the reduction of overall corporate tax rate of 30% to 25% together with removal of tax incentives and deductions.

He concluded with a wish list of resources to enable further research, that is, better availability of information on shareholding pattern of foreign and domestic shareholders of companies, in light of prevailing limited data availability for unlisted companies, information on revenue generated and

locked up in litigation on section 14A disallowance. It would be helpful if the government could share information on the above data with ITRAF.

Q&A:

1. Cost of capital is very high in India as compared to United States. Is DDT adding to cost of capital for corporate sector? What is the economic rationale of DDT?
2. Would it be good to go back to DDT to withholding tax? What was the reason for the government to opt for DDT and what are the benefits of DDT?
3. Is DDT counter-productive for FDI?

Suarav in reply to questions posed by participants said that the DDT addition to the cost of capital to corporate sector is very high. He added there is a scope to have a good research paper on this. Mohandas Pai said the cost of capital in the US is 6% and in India it is 13%. Taking inflation into consideration it is 5 % and 9% respectively. Dr. Shome reflected on the emergence of income as a tax source. A company is only a conduit for collecting income tax from individuals. Further DDT rates should be low since capital is a more mobile factor of production. Finally, the reality is that a high DDT at the level of companies acts as a disincentive for FDI.

Session 2:

Theme 3: Place of Effective Management

K.R. Sekar addressed another contentious issue between tax administration and MNE taxpayer that is the Place of Effective Management (PoEM). He explained the erstwhile provisions under I-T Act and the new provisions effective from FY 2016-17. PoEM definition was introduced in the Finance Act, 2015, PoEM is where key management and commercial decisions take place for conduct of business while leaving room for further clarification. PoEM was introduced by Direct Tax Code, the intention being to tax subsidiaries of MNEs outside India. He suggested to defer PoEM for at least 3 years initially, since rework on Guiding Circulars is required, and absolute clarity for taxpayers and revenue authorities is needed. The process of determining PoEM would primarily based on the fact that whether or not the company is ‘engaged in active business outside India’.

He further explained the suggestions in draft guidelines of Central Board of Direct Taxes (CBDT) to test for presence of PoEM in India. First test is Active Business test-if this is satisfied, there is no PoEM present in India. In absence of Active Business test being satisfied, it is a two stage process for PoEM to be present in India. First stage is an identification or ascertaining the person or persons who actually makes the key management and commercial decisions for conduct of the company’s business as a whole. Therefore, the second stage determines the place where these decisions are in fact being made.

He made several recommendations for the modification in the CBDT proposals. Currently, the corporate law in India recognizes Indian companies to consolidate their financial statements. However, the current tax laws do not recognize consolidation of tax returns. Hence, this should also be allowed for income tax returns as well as for wholly owned subsidiaries. This should be an alternative to PoEM. PoEM trigger should be tested on a hierarchical test basis. In other words, there should be a clear decision tree for a company to decide whether there is a PoEM trigger.

Some other recommendations on CBDT guidelines regarding Active Business Test were, once Active Business test is carried no further test is required, listing by subsidiaries outside India in any of the stock exchanges should be considered as Active Business test, all conditions to be satisfied under Para 5(a) whether cumulative or alternative, how to determine the status of assets- e.g. Inter Company receivables due from Indian Company, Related party transactions, Computation of Passive Income. He seeks clarification from CBDT on the meaning of key management and commercial decision, Board meeting- through video conferencing or call, Passing of circular resolution, Shareholders Control vs. Board Control and Accounting Records. There will be other practical issues which will arise on PoEM in compliance which will go into litigation.

Q&A:

1. Will location of Board of Directors Meetings and physical presence come under PoEM?
2. PoEM as anti-tax avoidance measure?

K. R. Sekar replied to the query from a participant on the issue of location of Board of Directors meetings and physical presence, and will it come under purview of PoEM. In reply he said if Board of Directors meetings occur outside India or decisions are not taken in India, then PoEM cannot exist in India. PoEM should be anti-avoidance and it's a mobile concept, loss making companies can shift PoEM to different locations. CBDT will issue draft guidelines in November, 2016.

Theme 4: Limitation of Benefit Clause

K.R. Girish discussed the genesis and basis of Limitation of Benefit (LOB) from the United States and undertook the cross country comparison. To counter treaty shopping, the US negotiated to have Limitation of Benefit ("LOB") provisions included in its Treaties including the US-India Income Tax Treaty. He further discussed the increasing incidence of Treaty Shopping, and to tackle that OECD formulated 15-point Action Plan to address Base Erosion and Profit Shifting (BEPS). The LOB Clause in OECD's BEPS Action -6 specifically covers Treaty abuse, which is largely in line with the US Model Convention barring a few additions.

Girish further examined the Indian experience. The excessive tax evasion techniques as Treaty Shopping, round tripping of funds etc. has led to undue loss of revenue to Indian exchequer. India has

always been a part of the global crusade against tax evasion; it was involved in devising Action Plans and also being one of the G20 countries who formally endorsed Action Plan against BEPS. He mentioned, India is committed to rapid, widespread and consistent implementation of BEPS measure. It is working towards implementation of source-based taxation to attain rights to tax income from source in India.

He further discussed the India-Mauritius Tax Treaty, which played a crucial role in establishing Mauritius as financial hub, home to some of the largest investment funds and a significant source of investment coming into India. Mauritius has contributed to about one-third of the FDI in India over a 15-year period between 2000-15. Double Non-taxation of capital gains under India-Mauritius Tax Treaty and more particularly Article 13(4) was a matter of controversy and extensive litigation in India. Indian authorities negotiated to insert specific limiting provisions and finally negotiations took place on 10 May, 2016. He also mentioned the India-Mauritius tax treaty protocol to eliminate double taxation without creating opportunities for double non-taxation, as per intent of Action-6 of BEPS Action Plan. Further, he explained the areas of ambiguity in India-Mauritius tax treaty protocol and asked tax authorities to clear the fog on such ambiguities, to eliminate varied interpretations and consequent litigation. He talked about the impact of India-Mauritius tax treaty on India-Singapore, India-Cyprus tax Treaty, may follow the same cue as Mauritius Protocol.

In his concluding remarks, he discussed the revised US Model Convention issued on 17th February, 2016 has sought to amend LOB provisions with renewed vigour, with respect to substance over form. At present, the need of the hour is to thwart tax evasion. Nonetheless, the implementation of GAAR under domestic law along with tax treaty override may not be the solution, as it could frighten the investors and lead to a lot of uncertainty. Accordingly, there is a need to strike a balance between enabling foreign investments but at the same time also curtailing tax evasion. Demographic dividends could become a demographic nightmare.

Session 3:

Theme 5: Protecting and Promoting Tax Base, LTUs

Mukesh Butani covered four crucial corporate income tax (CIT) matters that is, Rationalization of tax rates and incentives, adoption of General Anti-Avoidance Rule(GAAR) to counter abusive practices, introduction of Place of Effective Management (POEM) as a test for determining tax residency for foreign corporates and promoting concept of Large Taxpayer Unis (LTUs). He discussed the importance of tax policies in defining and sustaining growth momentum of Indian economy. Tax buoyancy is vital for meeting fiscal consolidation targets, to be achieved by broadening the tax base rather than increasing tax rates.

On the matter of the CIT rate, he pointed out that the high proportion of tax revenue foregone as mentioned in the Budget document reflects export oriented units in IT sector, SEZs, and the infrastructure sector including power, bridges, highways, water treatment and industrial parks. He said SEZs helped more to real estate developers and basic philosophy of SEZs is lost out. Acceleration of tax depreciation has been capped at 40% and tax incentive claims account for 42% of projected revenue foregone. Headline corporate tax rate reduced for manufacturing companies incorporate after 1st April, 2016 to 25%, and for small domestic companies having total turnover or receipts less than Rs. 50 million in FY 2014-15 to 29%.

Further, he talked about the recommendations for rationalization of tax rates and incentives. A clear timeline should be provided for tax rate reduction across the board to mitigate uncertainty and speculation, clarification on applicability of corporate tax rate reduction to foreign companies, review MAT levy under the IT Act and its appropriateness or relevance, consider continuing tax incentives for SMEs and / or crucial industries / segments in order to promote government's flagship 'Make in India' initiative; review overall effectiveness of DDT as it affects overall competitiveness, capping depreciation at 40% likely to disincentivize capital formation in the economy and adversely impact industrial activities.

He examined the second issue of GAAR provisions conceptualized in DTC 2009; legislated in IT Act vide Finance Act, 2012 and amended vide Finance Act, 2013 based on recommendations of the Expert Committee headed by Dr. Shome. Finance Act, 2015 deferred applicability to April 1, 2017; Budget 2016 reiterated government's commitment on implementing GAAR. He mentioned the exemption from GAAR provisions and Grandfathering of investments. He discussed the key challenges and recommendations for the effective implementation of GAAR - detailed guidelines should be issued to Revenue Authorities and use it as a last resort, clarity should be provided in case of overlap of GAAR and SAAR, clarity should be provided in case of override of tax treaty, it should not lead to penal action except selectively, and documentation standards and compliance requirements should be provided.

Butani explained the third issue of PoEM concept in brief as it was already covered by K.R. Sekar in detail in the second session. He made several recommendations for clarifying and modifying CBDT's PoEM proposals- to be replaced with CFC regulations as enacted in other jurisdictions, PoEM may have adverse consequences for foreign companies, clarity should be provided in relation to various provisions of IT Act and draft guidelines should be finalized considering stakeholder's comments. PoEM test to determine residency under the IT Act may conflict with PoEM rules provided as a tie breaker under the tax treaty.

Butani summarised with the fourth topic regarding LTUs prevailing challenges and shortcomings in LTU operations. He discussed the lack of synergy between CBDT and CBEC officers, restriction on transfer of excess CENVAT credit across units of the same company located in different LTU

jurisdictions, inadequate training and frequent transfer of staff. He suggested making LTU an extremely powerful tool and make it mandatory if required for particular threshold of income to make it successful. In line with global best practices, LTUs need to adopt tax friendly measures. There should be regular exchange of the UK and Australia, written guidance should be issue to taxpayers regarding correct tax position by department.

In the panel discussion Ravinder Saroop, Commissioner LTU explained the concerns related to LTUs being unsuccessful. He said administration and industry must have representation on both sides, industry is not willing to go to LTUs even though LTUs have collected a significant amount of revenues. However, there is a limited success, need to set-up road maps to revive LTUs. He said, LTUs have started Taxpayers Day initiative, any taxpayer can just walk into an LTUs on that day and get their work done without any prior appointment. There is a Central Registry Database which is used by both Direct and Indirect taxes departments for information exchange. Only chosen merit officers are posted to LTUs with required training so that they can understand the taxpayer's business. Dr. Shome said that he sent tax officers abroad to study LTUs in different countries when he was the Advisor to the Finance Minister. He talked about the LBS in the UK and large taxpayer units in Brazil. He said taxpayer's do not want to be monitored, LTUs suffered from personalities, lack of information exchange across departments, transfer pricing offices are hawkish in nature and GAAR officers should be trained before implementation.

Theme 6: Transfer Pricing Trends and Recommendations

K. R. Skear discussed matters that affect the taxability of MNEs and made several recommendations on MNE Transfer Pricing (TP) regulations. He covered the history of TP regulations to Income Tax Act, 1922, analysis of post economic liberalisation era, revolutionary transformation in TP regulations in India since inception and burgeoning cross-border transactions made the tax authorities suspicious of profit erosion from the Indian jurisdiction. TP adjustments experience a phenomenal increase for a period of FY 2006-07 to FY 2014-15 and adjusting about half of the scrutiny cases. He said trends in litigation show a low success rate of revenue department in appeals at ITAT, at High Court. Sekar covered topic-wise detailed analysis of issues, nature of issues, analysis of Indian Tax rulings on each topic, guidance form international regulations, gist of case laws and final recommendations.

Session 4:

Theme 7: Goods and Services Tax (GST)

P.V. Srinivasan provided a comprehensive analysis, commensurate findings and recommendations for proposed GST. He discussed indirect taxes coming under Union and State levies. He further talked about the issues in current tax regime, multiple taxes, multiple rates and no uniformity, narrow tax base,

multiple controls, cascading effect, inverted duty structure, double taxation- overlap in base classification and disputes, tax evasion, control goods/movement, difficulty in compliances, reverse charge and litigation or fatigue.

P.V.S. reflected on the trade distortions in current tax regime, high tax incidence on goods and services and indirect tax regime not aligned to international practices, import buoyancy, impact on export competitiveness, trade imbalances, supply chain overheads and loss of GDP in logistic cost. He further discussed the features of GST- a destination based tax, the burden falls on the final consumer, Input Tax Credit is allowed, transparent, unbiased and uniform single tax. GST in India is a tax on supply of goods, or service or both, it's a destination based consumption tax, the focus has shifted from manufacturing/sale/ service to supply, integration of Central levies, State levies and local levies and there is a seamless credit across supply chain and across all the States.

GST covered all goods or services except Alcohol, Electricity and Real Estate. Petroleum products to be brought under GST from a later date on recommendation of GST Council. GST rates should be based on Revenue Neutral Rate, floor rate with a small band of rates for standard rated goods/services for CGST and SGST, optional threshold exemption. Taxes to be subsumed under GST regime are Central Excise Duty/Additional Excise Duty, CVD/SAD, Service tax, central Sales Tax, Surcharge/Cess, VAT/Sales Tax, Entry Tax/Purchase Tax, Luxury Tax/Entertainment Tax, taxes on Lottery, betting and gambling, and Local Body tax /Octroi.

He further discussed the proposed GST structure in India that is Central GST (CGST), State GST (SGST) and Integrated GST (IGST). Additional tax would be levied on inter-state supply of goods in India-to be assigned to origin state and not VATable. He talked about the Input Tax Credit mechanism in GST, working of IGST Model, merits of IGST Model, and perceived benefits of GST to Trade and Government. He mentioned some macro issues such as Petroleum accounts for 20% of indirect taxes, Alcohol accounts for 16% of state's own tax revenues, 40% of Net Domestic Product is from the unorganized sector and 60% of GDP is outside the GST ambit.

Q&A:

1. There is a large number of issues from the service sector, IT in exports and input tax credit is allowed. How will the billing be done?
2. How will Input Tax Credit be apportioned?

Dr. Shome chaired the session along with Ravinder Swaroop, Commissioner-LTU, Nagendra Kumar, Principal Additional Director General-DGCEI, Bangalore, Suresh Senpaty, P.V. Srinivasan and Bhavana Dosi. Replying to questions put forward by participants and panelists Nagendra Kumar, reflected on the issues or concerns of services sector, input tax credit, dual control issues, dispute resolution mechanism, billing done by services sector, registration requirements and

apportionment of input tax credit. He said that both State and Centre should understand the draft Model GST Law and industry should provide substantial feedback on this. He further mentioned that current dual GST will be an opportunity and challenge and there is little time left to incorporate changes. He said TARC reports have recommended for administrative reforms and there is a need for administrative restructuring for GST. He mentioned that 60,000 officers are being trained, processes are ready to implement GST after it gets voted in Rajya Sabha. GST will prove to be the best system for fiscal federal tax system, benchmarking it with global practices.

Theme 8: International tax Research: Going Forward

Suresh Senapaty chaired the session along with Dr. Shome, Ravinder Swaroop, Nagendra Kumar, Mukesh Butani and Bhavana Dosi. They discussed topics to be taken up for future research on International taxation. They are as follows:

1. Global Mobility of Labour
2. Equalization of Levy
3. Foreign Tax Credit
4. Indirect Taxes
5. Social Impact of Taxes
6. How will income be computed? -Indian companies are alienating to Ind-AS
7. Resolution of Disputes-ADR in Context of Tax
8. International Benchmarking of Indian Tax Administration- IMF and World Bank “IMTAX” Model -for ease of doing Business
9. Double Taxation or Double Non-Taxation – Cross Country Analysis
10. Taxation of Digital Economy

Conclusion

K.R. Sekar in the closing session reviewed ITRAF’s key themes and discussed concerns raised by the participants on emerging issues of Taxation. He thanked participants for their lively interaction. There is a continuing interest in the work of ITRAF to stimulate fact-based policy analysis and formulation that responds to current needs. He also requested Industry representatives to provide substantial feedback on GST Model Tax Law put in public domain for comments.