

PAPER – 6 C: INTERNATIONAL TAXATION

(One paper – Three hours – 100 Marks)

Objective:

To develop an understanding of the concepts, principles and provisions relevant to international taxation and acquire the ability to apply such knowledge to make computations and address issues in practical case scenarios.

Content:

Part I - Taxation of International Transactions and Non-resident Taxation in India (50 Marks)

- 1. Transfer Pricing provisions under the Income-tax Act, 1961**
 - (i) Arm's Length Price
 - (ii) International Transactions
 - (iii) Most Appropriate Method
 - (iv) Functions, Assets and Risk Analysis
 - (v) Documentation & Compliances
 - (vi) Specific Reporting Regime in respect of Country by Country reporting and master file
 - (vii) Advance Pricing Agreements
- 2 Other Provisions relating to taxation of international transactions and non-resident taxation under the Income-tax Act, 1961**
 - (i) Non-resident Taxation (including Source Rule of Taxation)
 - (ii) Double Taxation Relief
 - (iii) Advance Rulings
- 3. Law and Procedures under the Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act, 2015 – An Overview.**

Part II - Other aspects of International Taxation (50 Marks)

- 1. Overview of Model Tax Conventions**
 - (i) OECD Model Tax Convention
 - (ii) UN Model Tax Convention

(iii) US Model Tax Convention

2. Tax treaties, Application and Interpretation

(i) Features of Tax treaties

(ii) Overview of Tax Information Exchange Agreements

(iii) Commentaries and their importance

(iv) Role of Vienna Convention in application and interpretation of tax treaties

3. Anti Avoidance Measures

(i) Controlled Foreign Corporations

(ii) Base Erosion and Profit Shifting

(iii) Other Anti Avoidance Measures

4. Taxation of E-Commerce Transactions

(i) Introduction

(ii) Emerging issues

(iii) Equalisation levy

Note –

- (1) Transfer Pricing in Part I to carry weightage of 30 marks.
- (2) If any new legislation(s) are enacted in place of an existing legislation(s), the syllabus will accordingly include the corresponding provisions of such new legislation(s) in the place of the existing legislation(s) with effect from the date to be notified by the Institute. Similarly, if any existing legislation(s) on direct tax laws ceases to be in force, the syllabus will accordingly exclude such legislation(s) with effect from the date to be notified by the Institute.
- (3) The specific inclusions/exclusions in any topic covered in the syllabus will be effected by way of Study Guideline every year, if required. Specific inclusions/exclusions in a topic may also arise due to additions/deletions made every year by the Annual Finance Act.