

School of Law

Bachelor of Law

ETE - May 2023

Time : 3 Hours

Marks : 50

Sem X - BALB5034 - International Taxation

Your answer should be specific to the question asked

Draw neat labeled diagrams wherever necessary

1. Explain the concept of international tax and its need in the present society. K1 CO1 (2)
2. What are the points of conflict between developing and developed nation in terms of taxation? K2 CO2 (2)
3. Exemptions are used by countries to avoid the problem of double taxation. Explain. K3 CO3 (2)
4. "Dual tax residency has become common in globalized era." Critically analyse the above statement. K3 CO4 (2)
5. How is tax residency of a partnership firm determined? K4 CO5 (2)
6. "The resident status of different entities is determined majorly through the control and management test". What is meant by "control and management"? K3 CO1 (5)
7. What are different types of advance rulings and how are they relevant? K4 CO2 (5)
8. "Any kind of prior agreement can prevent future disputes." In context of the given statement, explain the difference between Mutual Agreement Procedure and Advance Pricing Agreement. K6 CO6 (6)
9. The concept of Base Erosion Profit Shifting (BEPS) has been introduced by OECD. The organization is increasingly passing regulations to govern it. Discuss and critically analyse the two step BEPS regulation recently passed by OECD. K4 CO3 (8)
10. Explain the Comparable uncontrolled price method for transfer pricing with examples. K5 CO4 (8)
11. Explain the concept of foreign tax credit with example. K6 CO5 (8)