


Name:			
Enrolment No:			
UPES End Semester Examination, Dec 2023			
Course: International Taxation Program: B. Com LL. B (Hons.) Course Code: CLTX5004		Semester : IX Time : 03 hrs. Max. Marks: 100	
Instructions: All questions are compulsory. Kindly attempt all parts of a question together.			
SECTION A (5Qx2M=10Marks)			
S. No.		Marks	CO
Q 1.	Who can apply to the Authority of Advance Ruling?	2	CO1
Q 2.	Define Safe Harbour Rules.	2	CO1
Q 3.	POEM is determined for Foreign Companies with turnover of more than Rupees 30 Crore. Answer True/False	2	CO1
Q 4.	List 5 methods of calculation of Arm's Length Price as per Income Tax Act 1961.	2	CO1
Q 5.	State the constitution of Authority for Advance Ruling.	2	CO1
SECTION B (4Qx5M= 20 Marks) Short answer type questions			
Q 6.	Discuss the circumstances in which an arrangement can be declared as an Impermissible Avoidance Arrangement (IAA).	5	CO2
Q 7.	Describe the benefits and procedure of Advance Pricing Agreement (APA).	5	CO2
Q 8.	Explain the meaning of Notified Jurisdictional Area.	5	CO2
Q 9.	Describe the conditions, which should be satisfied if a place has to be considered as Permanent Establishment as per Article 5 under OECD as well as UN Model Tax Convention.	5	CO2
SECTION-C (2Qx10M=20 Marks) Long answer type questions			

Q 10.	Examine the need of equalization levy in light of BEPS and provisions incorporated in Indian Tax laws in respect of such levy.	10	CO3
Q 11.	Illustrate the Vodafone Case and the resultant amendments made to Section 9 of Income Tax Act 1961.	10	CO3
SECTION-D (2Qx25M=50 Marks) Case study-based questions			
Q 12.	<p>A Ltd. holds 40% equity shares of B Ltd. Further A Ltd. and B Ltd. entered into an international transaction wherein the Actual Transaction Price is Rs. 150.</p> <p>On application of Most Appropriate Method, it resulted in determination of more than price.</p> <p>Data set of Arm's Length Prices:</p> <ol style="list-style-type: none"> 1. Uncontrolled Transaction price between A LTd. & C LTd.: Rs. 140 2. Uncontrolled Transaction price between A LTd. & D LTd- Rs. 146 3. Uncontrolled Transaction price between A LTd. & E LTd- Rs. 180 4. Uncontrolled Transaction price between A LTd. & F LTd- Rs. 156 5. Uncontrolled Transaction price between A LTd. & G LTd- Rs. 152 <p>Calculate the Arm's Length Price in respect of international transaction between A Ltd. and B Ltd. based on the given data set.</p> <p>Also, Mention the provision of Income Tax Act applicable to the above problem.</p>	25	CO4
Q 13.	<p>Apply the most appropriate method to determine Arm's Length Price in the following case:</p> <ul style="list-style-type: none"> • Transaction A between Asha Ltd. and Riya Ltd. (Associate Enterprises)= Asha Ltd. sold 12000 units of Priyagold perfume @ Rs. 3000 per unit. • Transaction B between Asha Ltd. and Shreya Ltd. (Unrelated Enterprises)= Asha Ltd. sold 1500 units of Priyagold perfume @ Rs. 5000 per unit. <p>Additional Information:</p> <ul style="list-style-type: none"> • Sale to Riya Ltd. is FoB and Sale to Shreya Ltd. is CIF. Cost of Insurance and Freight is Rs. 300 per unit. • Since order from Riya Ltd. is more in quantity, Asha Ltd. provided discount of Rs. 150 per unit. • Asha Ltd. provided warranty to Riya Ltd. but did not provide the same to Shreya Ltd. Cost of Warranty is Rs. 100 per unit. 	25	CO4

	<p><u>Compute ALP and mention the name of the Most Appropriate Method used for computation along with the relevant provisions of Income Tax Act 1961.</u></p>		
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