



Holistic solutions for complex tax challenges

Tax and Regulatory Services

skpgroup.com



As businesses cross international borders and those borders themselves become increasingly blurred, the complexity of any MNC's tax affairs grows exponentially. Managing uncertainties and complexities can no longer be treated as an afterthought.

Tax strategy must not only be responsive to the prevailing tax and regulatory environment, but must also anticipate the contours of future developments in policy, administration and jurisprudence. Failure to do so can expose organisations to franchise risks and governance challenges, besides increasing the overall cost of doing business.

As a trusted tax advisor to leading MNCs for more than five decades, our Tax and Regulatory Services practice is one of the most highly regarded tax groups in India. Awarded as India Tax Firm of the Year, 2016 by International Tax Review, the tax team at SKP helps organisations formulate effective strategies to optimise taxes, implement innovative tax planning and effectively manage compliance.

With more than 175 team members from seven offices, SKP's Tax Team works with various types of clients - from Fortune 500 corporations and closely held businesses to high net-worth individuals. Our team provides sound and practical advice in corporate tax, international tax, indirect taxes, transfer pricing, dispute resolution and expatriate tax matters. Our tax and regulatory group also assists clients in structuring a wide range of transactions, from private equity deals to corporate acquisitions and disposals.

Clients rely on us for sound technical advice blended with effective, practical judgment in structuring tax-efficient transactions, minimising the burden of compliances and optimising tax synergies.

SKP **360°**

We look at ourselves as your partner and not just a service provider. We strive to learn every client's unique challenges by providing personalised attention, which enables us to arrive at relevant and innovative solutions.

We explore and examine all aspects of a situation, often delving into issues beyond the defined scope of work. With our collaborative approach, we are dedicated to ensuring that you receive our support throughout the business lifecycle.

We are your 360-degree-solution-providing partner.

Our **Services**

Setup and Transaction Advisory

- · Inbound Investment Structuring
- Mergers, Demergers, Slump Sale
- · Business Structuring
- Tax Due Diligence
- Permanent Establishment Advisory
- BEPS and GAAR Advisory
- EPC Contracts and Bid Evaluation
- Insolvency and Bankruptcy Advisory

We recognise the need to blend varied business requirements of global businesses with the requirements of tax law and tax administration. Stemming from your needs, we provide services that address all aspects relevant to a business or a transaction by providing and implementing 360-degree solutions

Business Tax

- Corporate Tax Returns
- Withholding Tax matters
- Revenue Audits and Litigation
- Effective Tax Rate Management
- Tax Health-check and Diagnostic
- ICDS Impact Analysis
- FATCA and CRS Compliance
- Business Tax Compliances
- Not-for-Profit

Transfer Pricing

- Global Policies and Documentation
- Inter-company Agreements
- Advance Pricing Agreements and Competent Authority Negotiations
- · Certification Services
- Supply Chain Analysis and Tax Optimisation
- Benchmarking Services
- Representation and Litigation

Outbound Solutions

- Outbound Investment Structuring
- · Overseas Entity Set up
- Global Business Registrations
- Tax Compliance Management

Regulatory

- Exchange Control Diagnostics
- Exchange Control Advisory
- · Obtaining Approvals
- Representation Services
- · Regulatory Compliances

Foreign Portfolio Investors

- Structuring FPI Operations
- FPI Registration
- · Regulatory and Accounting
- Compliances and Certifications
- · Representation and Litigation

Human Capital

- · Global Mobility Solutions
- Succession Planning
- End-to-End Compliance Management



Our **Experience**



Advised a listed Indian company on the optimal holding company jurisdiction for it to make investments or acquisitions in 23 target countries



Successfully assisted a US based entity engaged in investment advisory services in signing a Unilateral Advance Pricing Agreement with the Indian Tax Authorities



Assisted a US-listed publishing company in formulating a global transfer pricing policy with respect to intra-group transactions with its Indian subsidiary and maintaining documentation under US and Indian regulations



Provided global controllership and compliance support for a multinational IT services provider, including indirect tax compliance for Australia and Singapore and payroll computations and compliance for Australia, Singapore, South Africa and the UK



Evaluated the impact of the newly introduced Goods and Services Tax (GST) on one of the world's largest vaccine manufacturer and assisted in revisiting the sales strategies and pricing policies



Advised a global shipping group on migrating its Indian operations from a company structure to a Limited Liability Partnership (LLP) structure in a tax-efficient manner



Advised a British pharmaceutical company on minimising tax in the UK and other jurisdictions on international royalty income from five countries



Advised a leading medical device and implant company on tax withholding of distributor payments in multiple countries



Successfully defended a large carpet manufacturing multinational company on withholding tax positions relating to intra-group payments

Winner of Advisory
Project of the Year
at The Accountant
& International
Accounting Bulletin
Awards 2017

Winner of India Tax Firm of the Year at the International Tax Review's Asia Tax Awards 2016

Ranked among the **Leading**Tax Firms in India in
International Tax Review's
World Tax guide
2009-2017

Ranked among the **Leading**Transfer Pricing Firms in
India in TP Week's World
Transfer Pricing guide
2014-2017

The SKP **Advantage**

- Extensive tax library and access to global and regional transfer pricing databases
- Worldwide network of associates and affiliates – providing global advice with a local touch
- Established credibility with tax and regulatory authorities
- Client base of MNCs including Fortune 500 corporations
- Process and technology driven compliances
- Experienced leaders and team Our Tax Partner was nominated for the Asia Tax Leader Award in 2017 by International Tax Review
- Dedicated Knowledge and Solutions Team
- Partner-led personalised services





55+

years of experience in accounting, advisory, assurance and tax



1000+

employees from accounting, legal, tax, engineering, management and other diverse backgrounds



1200+

active clients including Fortune 500 companies, multinationals, and companies listed on global exchanges



45+

countries where we have our clients

About SKP

SKP is a global professional services group with its principal areas of operations in business advisory, end-to-end finance and accounting solutions including attest function and taxation, business process management, and IT risk advisory. SKP's focus is to provide solutions which result in tangible business benefits and performance improvements.

Our multi-disciplinary teams serve clients from various geographies and industries ensuring global standards. With over 80% of our client-base being international, we truly understand the needs of global companies and their expectations and our customized global solutions are designed to factor in local nuances. Our commitment is rooted in a passion for solutions, empowering our people and clients to achieve more.

Contact Us

India - Mumbai

Urmi Axis, 7th Floor Famous Studio Lane, Dr. E. Moses Road Mahalaxmi, Mumbai 400 011 India **T:** +91 22 6730 9000 **E:** IndiaSales@skpgroup.com

USA - Chicago

2917 Oak Brook Hills Road
Oak Brook, IL 60523
USA
T: +1 630 818 1830
E: NorthAmericaSales@skpgroup.com

UAE - Dubai

Emirates Financial Towers 503-C South Tower, DIFC PO Box 507260, Dubai UAE T: +971 4 2866677

E: UAESales@skpgroup.com

Canada - Toronto 269 The East Mall Toronto, ON M9B 3Z1 Canada

T: +1 647 707 5066

E: NorthAmericaSales@skpgroup.com

www.skpgroup.com



linkedin.com/company/skp-group



twitter.com/SKPGroup



facebook.com/SKPGroupIndia



plus.google.com/+SKPGroup



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