

IMBA in BI/IB/APR Sem.-8 Examination**F/IB****I. T.****Time : 2-30 Hours]****May-2025****[Max. Marks : 70**

- Instructions :** (1) This paper contains **FIVE** questions.
 (2) All questions are compulsory.
 (3) Question No.2, 3, 4 have internal options.
 (4) Figures in the right side in parenthesis indicate marks.

- Q:1** Explain in detail the Double Tax Avoidance Agreement with appropriate example. (14)
Q:2 Explain the Provisions of International Taxation with respect to Taxation of Non-Residents under Indian Tax law. (14)

OR

- Q:2** Explain the Provisions of International Taxation in context of Scope of Total Income & Incidence of tax. (14)
Q:3 Explain UN Multilateral Contract (Treaty) in detail (14)

OR

- Q:3** State the three pillars around which the action plans are structured to mitigate ill effects of Base Erosion and Profit Sharing. (14)

- Q:4** Akbar Ltd. purchases 20,000 MT metal from Birbal Ltd. its subsidiary @INR 60,000 /MT. Also purchase from Babar Ltd. 5000 MT @ INR 80,000/MT. Akbar Ltd. received a discount of INR 1000/MT as a quantity discount from Birbal Ltd. Birbal Ltd. allows credit of one month at 2.50% pm. The transaction with Birbal Ltd. is at FOB (Free on board) whereas with Babar Ltd. is at CIF (Cost, Insurance, and Freight). The cost of freight and Insurance is INR 2,000.
 Compute the Arm's Length Price as per International taxation Practices as per Comparable Uncontrolled Price Method. (14)

OR

- Q:4** Explain about the Indian General Anti Avoidance Rules, Specific Anti Avoidance Rules and Applicability of General Anti Avoidance Rules in context of Limitations of Benefits (LOB) Provisions and Anti Abuse Rules. (14)
Q:5 Discuss the Global Tax Reforms and its Implications (14)