



In the past decade, there has been an outcry by many nations on the holding company structures of multinational enterprises worldwide. Many economies, particularly, developing economies like India and China see such holding structures as resulting into base erosion. This has led to tweaking of their domestic laws in the past decade. With many developed economies also sharing the same concern, considerable action has been taken leading to many developments on the international tax front, most prominent being the BEPS project. This article seeks to give an overview on the emergence of international holding structures through preferred jurisdictions, the key connected tax aspects, the way Indian judiciary has looked at them in the past and, how the evolved domestic and international tax laws would impact them going forward. EVOLUTION OF HOLDING COMPANY STRUCTURES Globalization and.....