



1. BACKGROUND Base Erosion and Profit Shifting (BEPS) Project of the Organisation for Economic Co-operation and Development (OECD) was launched with more than one objective - preliminary one being to set up a framework within the current international tax regime that brings in more clarity, consistency and fairness in taxing rights. For instance, key suggestions of the BEPS project include taxing profits where the economic activities are carried out or value is created; amending the historic tax rules to align with the new business models and restrict strategies that result in double non-taxation of cross border incomes. The BEPS Project provides for 15 Action Plans dealing with several topics ranging from tax challenges in digital economy, dispute resolution, artificial avoidance of permanent establishment, and so on. With the above backdrop, on 7 June 2017, 68 developed as well as developing countries / jurisdictions (including India) signed.....