



1. Introduction The advent of globalization had paved the way for migration of employees across borders over last few decades on a large scale basis. Keeping this in mind organizations generally had designed various assignment policies depending upon the requirements of their businesses. These can be categorized as long term, short term, permanent transfers, extended business travelers, commuters etc. These arrangements often give rise to a host of issues from tax and regulatory perspective for both the home country and host country employer. Therefore, it is a prudent practice to evaluate such arrangement to ensure that it is well structured so that the risks, if any, are addressed appropriately. The last few years a trend was observed that more and more companies were preferring a permanent transfer (complete migration) of employees to host country entities as opposed to a traditional long term arrangement. This was purely from a c.....