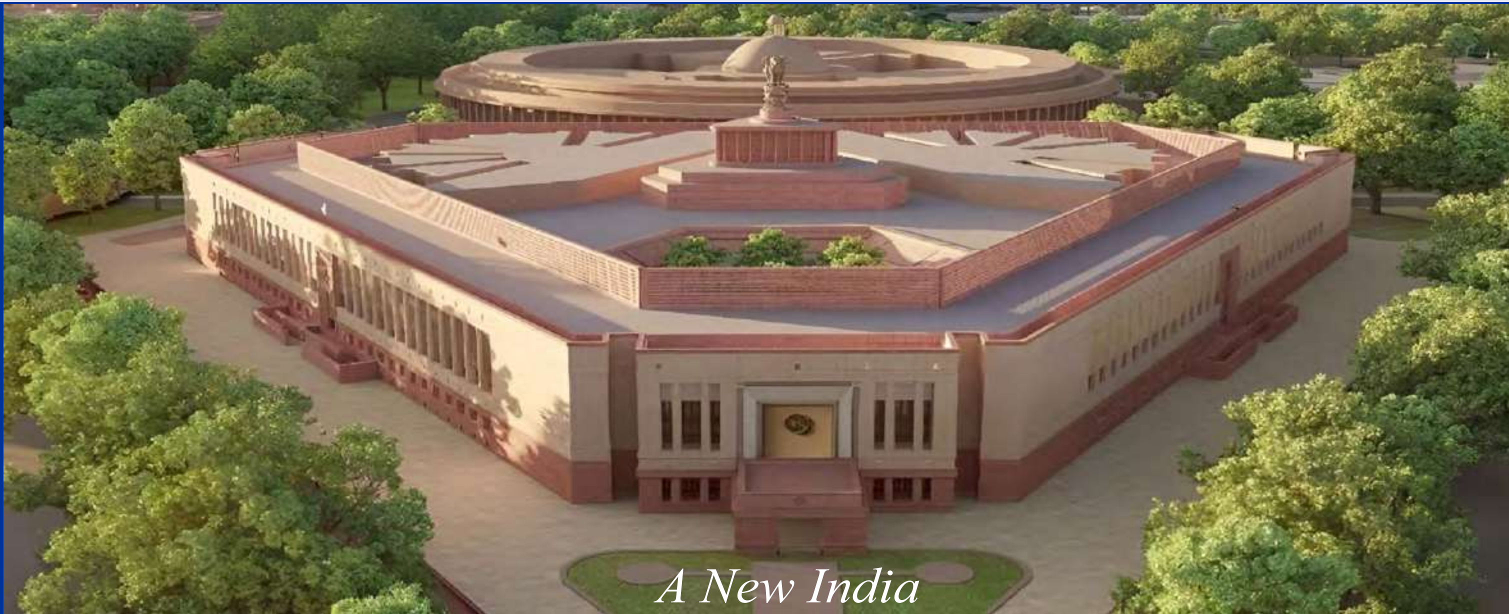
INDIA BUDGET
2023 - 24



01 February 2023

JMP Advisors - Ten and beyond!

We are pleased to announce that JMP Advisors has recently completed TEN years!

The journey of JMP Advisors so far has been fascinating, converting challenges into opportunities and growing our practice, step by step, while upholding our Values - Quality, Teamwork, Respect, Transparency and Integrity. Over the years, we have added new leaders to the Firm and significantly expanded our service offerings in the tax and regulatory space, including transaction services. Having also partnered with a large international network of highly experienced tax firms across more than 40 countries, JMP Advisors has the necessary skills and expertise to continue providing high quality services to our clients and is poised for a deeper foray into the domestic and overseas client markets.

We are cognizant that we would not have reached this milestone without the ongoing support of our clients and well - wishers, especially during the global uncertainty in the recent past. We would like to take this opportunity to thank you for walking with us every step of our journey and look forward to our continued partnership in the years to come.

Thank you!

The JMP Advisors Team

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Foreword

All eyes were on the Indian Finance Minister (‘FM’) as she presented Budget 2023-24 - her first Budget in ‘Amrit Kaal’, the two and half decades leading to the centenary of India’s independence - and her last full Budget ahead of the General Elections in 2024. Despite an uncertain geopolitical environment, tightening of monetary policies in most developed economies, inflationary conditions and a depreciating Rupee, the current fiscal year witnessed the Indian economy emerge relatively unscathed as compared to other economies. With a sense of finally having left the pandemic behind, private consumption in several sectors has accelerated, which is expected to give a jump start to the investment cycle. As per the World Bank, India is well placed to navigate potential headwinds in 2023. The FM has chosen to focus on growth while adhering to fiscal prudence, estimating the fiscal deficit at 6.4 per cent of GDP, in line with the Budget Estimate. The budgets for subsidies on food and fertilisers have been reduced sharply. Growth for the current fiscal year is estimated to be at 7 per cent, which is the highest among all major economies. Together with the Presidency of the G20 nations this year, the New India has a unique opportunity to strengthen its role in the world economic order.

Budget 2023-24 focuses on seven priorities or ‘Saptarishi’, the seven seers to guide India’s progress and fulfil the vision of a prosperous and inclusive India. Some of the noteworthy policy announcements in this regard include a steep increase in the capital investment outlay for the third year in a row, developing Centres of Excellence for Artificial Intelligence, use of Permanent Account Number as the common business identifier and setting up an Agriculture Accelerator Fund to encourage agri Start-ups by young entrepreneurs. On the tax front, the reduction in the highest rate of surcharge from 37 per cent to 25 per cent under the new tax regime, extension of the concessional tax rate of 15 per cent to certain co-operative societies, increase in the threshold for the presumptive tax regime and deploying Joint Commissioners to expedite the disposal of certain appeals are laudable measures. On the downside, absence of rationalization of the capital gains system, proposal to tax Market Linked Debentures at a higher rate, increase in the Tax Collected at Source ('TCS') on overseas tours and certain remittances and curtailing the deduction for certain long term capital gains to INR 100 million (~USD 1.25 million) are some of the dampeners.

On the whole, Budget 2023-24 is an indicator that the Indian economy is not unlike the lotus flower adorning the Upper House in the new Parliament building, a symbol of resilience blooming miraculously clean out of muddy waters. Likewise, India is set to emerge from the global slowdown, poised for strong growth to achieve the target of becoming a USD 5 trillion economy in the coming years.

The JMP Advisors Team
1 February 2023

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Key policy announcements

Key policy announcements

Budget 2023-24 seeks to build on the blue print drawn for India@100. It envisions developing India through seven distinct focus areas of Inclusive Development, Reaching the Last Mile, Infrastructure and Investment, Unleashing the Potential, Green Growth, Youth Power and Financial Sector. This section summarises the key policy announcements in the Budget.

1. Inclusive Development

i. Agriculture

a. An Agriculture Accelerator Fund will be set-up to encourage agri-startups by young entrepreneurs in rural areas. Also, to provide Digital Public Infrastructure for Agriculture and modern technologies to transform agricultural practices to increase productivity and profitability.

b. The agriculture credit target will be increased to INR 20 trillion (~USD 250 billion) with a focus on animal husbandry, dairy and fisheries.

c. A plan will be set up to decentralise storage capacity. This will help farmers store their produce and realize remunerative prices through sale at appropriate times. The Government will also facilitate setting up of a large number of multipurpose co-operative societies, primary fishery societies and dairy co-operative societies in the next five years.

ii. Health, Education and Skilling

a. To establish 157 new nursing colleges co-located with the existing 157 medical colleges.

b. Steps will be undertaken to enhance research facilities in select India Council of Medical Research labs, pharma innovation and introduction of multidisciplinary courses for medical devices in existing institutions to upgrade skilled manpower and boost high end manufacturing/research.

c. Teachers' training will be re-envisioned through innovative pedagogy, curriculum transaction, continuous professional development, dipstick surveys and Information and Communications Technology implementation. The District Institutes of Education and Training will be developed as vibrant institutes of excellence.

d. A National Digital Library for children and adolescents will be set-up to facilitate availability of quality books across geographies, languages, genres and levels, and device agnostic accessibility.

2. Reaching the Last Mile

i. To improve socio-economic conditions of the Particularly Vulnerable Tribal Groups (‘PVTGs’), a mission will be launched to provide basic facilities such as safe housing, clean drinking water and sanitation, improved access to education and health and nutrition. An amount of INR 150 billion (~USD 1.9 billion) will be made available to implement the mission in the next three years under the Development Action Plan for Scheduled Tribes.

ii. In the next three years, it is proposed to recruit 38,800 teachers and support staff for the 740 Eklavya Model Residential Schools, serving 350,000 tribal students.

iii. The outlay for PM Awas Yojana is being enhanced by 66 per cent to over INR 790 billion (~USD 10 billion).

3. Infrastructure and Investment

i. Capital Investment/Expenditure

Capital investment outlay is being increased steeply for the third year in a row by 33 per cent to INR 10 trillion (~USD 130 billion), with the objective of achieving higher growth and job creation. Grantsin-Aid are to be provided to State Governments for creation of capital assets. The ‘Effective Capital Expenditure’ is budgeted at INR 13.7 trillion (~USD 170 billion).

ii. Interest free loan to State Governments

The 50-year interest free loan to State Governments is being continued for one more year to spur investment in infrastructure and to incentivise them for complementary policy actions, with a significantly enhanced outlay of INR 1.3 trillion (~USD 16 billion).

iii. Railways

A significant capital outlay of INR 2.40 trillion (~USD 30 billion) has been provided for the Indian Railways.

iv. Logistics

One hundred critical transport infrastructure projects, for last and first mile connectivity for ports, coal, steel, fertilisers and food grains sectors have been identified. They will be taken up on priority with an investment of INR 750 billion (~USD 9.38 billion), including INR 150 billion (~USD 1.88 billion) from private sources.

v. Urban Infrastructure Development Fund

An Urban Infrastructure Development Fund (‘UIDF’) will be established through use of priority sector lending shortfall to create urban infrastructure in Tier 2 and Tier 3 cities. An amount of INR 100 billion (~USD 1.25 billion) per annum will be allocated for it.

vi. Sustainable Cities

State Governments will be encouraged to undertake urban planning reforms and actions to transform cities into ‘sustainable cities of tomorrow’ by way of efficient use of land resources, resources for urban infrastructure, transit-oriented development, improved sanitation, enhanced availability and affordability of urban land and opportunities for all by enhancing creditworthiness for issuance of municipal bonds.

4. Unleashing the Potential

i. For realising the vision of ‘Make AI in India and Make AI work for India’, three centres of excellence for Artificial Intelligence will be set-up in top educational institutions.

ii. A one stop solution for reconciliation and updating the identity and address of individuals maintained by various government agencies, regulators and regulated entities, will be established using DigiLocker service and Aadhaar as foundational identity.

iii. For business establishments required to have a Permanent Account Number (‘PAN’), the PAN will be used as the common identifier for all digital systems of specified government agencies. This will bring ease of doing business and will be facilitated through a legal mandate. To obviate the need for separate submission of the same information to different Government agencies, a system of ‘Unified Filing Process’ will be set-up.

iv. In cases of failure by Micro, Small and Medium Enterprises (‘MSMEs’) to execute contracts during the Covid period, 95 per cent of the forfeited amount relating to bid or performance security, will be returned to them by Government and Government undertakings. This will provide major relief to MSMEs.

v. To enable more Fintech innovative services, the scope of documents available in DigiLocker for individuals will be expanded. An Entity DigiLocker will be set up for use by MSMEs, large business and charitable trusts for storing and sharing documents online securely, whenever needed, with various authorities, regulators, banks and other business entities.

vi. Administration of justice

For efficient administration of justice, Phase-3 of the E-Courts project will be launched with an outlay of INR 70 billion (~USD 0.88 billion). To settle contractual disputes of Government and Government undertakings, a voluntary settlement scheme will be introduced wherein the arbitral award is under challenge in a court.

vii. Lab Grown Diamonds

Lab Grown Diamonds ('LGD') is a technology-and innovation-driven emerging sector with high employment potential. To encourage indigenous production of LGD seeds and machines and to reduce import dependency, a research and development grant will be provided to one of the IITs for five years.

5. Green Growth

India is moving towards net-zero carbon emission by the year 2070 to usher in green industrial and economic transition. The Budget builds on the focus on green growth.

i. Green Hydrogen Mission

The National Green Hydrogen Mission, with an outlay of INR 197 billion (~USD 2.46 billion), will facilitate transition of the economy to low carbon intensity, reduce dependence on fossil fuel imports, and make the country assume technology and market leadership in this sunrise sector, to reach a target of annual production of 5 Modern Monetary Theory (MMT) by the year 2030.

ii. Energy Transition

To provide INR 350 billion (~USD 4.4 billion) for priority capital investments towards energy transition, energy security and net zero objectives.

iii. Vehicle Replacement

Replacing old polluting vehicles is an important part of greening our economy. In furtherance of the vehicle scrapping policy mentioned in Budget 2021-22, adequate funds have been allocated to scrap old vehicles. State Governments will also be supported in replacing old vehicles and ambulances.

iv. Others

Steps will be undertaken for environment preservation such as Mangrove Initiative for Shoreline Habitats and Tangible Income (‘MISHTI’), optimal use of wetlands, biodiversity, carbon stock and also to promote coastal shipping for passengers and freight. For promoting circular economy, 500 new ‘waste to wealth’ plants will be established at a total investment of INR 100 billion (~USD 1.25 billion).

6. Youth Power

i. Upskilling and Training the Youth

Pradhan Mantri Kaushal Vikas Yojana 4.0 will be launched to skill youth within the next three years to provide on-job training, industry partnership and alignment of courses with needs of industry will be emphasized. To set up 30 Skill India International Centres across different States. A Skill India Digital Platform will be launched.

ii. National Apprenticeship Promotion Scheme

Stipend to be provided to millions of youth in three years by way of Direct Benefit Transfer under a Pan-India National Apprenticeship Promotion Scheme to be rolled out.

iii. Tourism

With an integrated and innovative approach, at least 50 destinations will be earmarked for addition of physical connectivity, virtual connectivity, tourist guides, high standards for street food and tourists' security. All these aspects would be made available on an App to enhance tourist experience. The focus of development of tourism would be for domestic as well as foreign tourists. Eco tourism opportunities are also proposed to be enhanced.

iv. Unity Mall

States will be encouraged to set up a Unity Mall in their respective state capital or most prominent tourism centre or the financial capital for promotion and sale of their own One District One Product and other handicraft products and for providing space for such products of other States.

7. Financial Sector

i. Credit Guarantee for MSMEs

The revamped credit guarantee scheme for MSMEs will take effect from 1 April 2023 through a corpus infusion of INR 90 billion (~USD 1.13 billion). This will enable additional collateral-free guaranteed credit of INR 2 trillion (~USD 25 billion). Further, the cost of the credit will be reduced by about 1 per cent.

ii. National Financial Information Registry (‘NFIR’)

NFIR will be set up to serve as the central repository of financial and ancillary information. A new legislative framework will govern this credit public infrastructure and it will be designed in consultation with the Reserve Bank of India (‘RBI’).

iii. Simplifying Financial Sector Regulations

To simplify, ease and reduce cost of compliance, financial sector regulators will be requested to carry out a comprehensive review of existing regulations. For this, they will consider suggestions from public and regulated entities. Time limits to decide the applications under various regulations will also be laid down.

iv. Gujarat International Fin-Tech City (‘GIFT’)

To enhance business activities in GIFT, the following measures will be taken:

a. Delegating powers under the Special Economic Zone (‘SEZ’) Act to IFSCA to avoid dual regulation,
b. Setting up a single window IT system for registration and approval from IFSCA, SEZ authorities, GSTN, RBI, SEBI and IRDAI,
c. Permitting acquisition financing by IFSC Banking Units of foreign banks,
d. Establishing a subsidiary of EXIM Bank for trade re-financing,
e. Amending IFSCA Act for statutory provisions for arbitration, ancillary services, and avoiding dual regulation under SEZ Act,
f. Recognizing offshore derivative instruments as valid contracts, and
g. For countries looking for digital continuity solutions, Data Embassies will be set up in GIFT IFSC.

v. Citizen friendly measures

a. For investors to reclaim unclaimed shares and unpaid dividends from the Investor Education and Protection Fund Authority with ease, an integrated IT portal will be established.

b. The maximum deposit limit for Senior Citizen Savings Scheme will be doubled and a one-time new small savings scheme, Mahila Samman Savings Certificate, will be made available for a two-year period.

vi. Central Processing Centre under the Companies Act

A Central Processing Centre will be set up for faster response to companies through centralised handling of various forms filed with field offices, under the Companies Act.

Key tax proposals

Direct taxes

This section summarises the significant direct tax proposals announced in Budget 2023-24. These proposals are subject to enactment of the Finance Bill, 2023. Further, the direct tax proposals in the Finance Bill, 2023 are effective from FY 2023-24 unless otherwise specifically stated. References to sections are to sections in the Income-tax Act, 1961 ('the IT Act') unless otherwise stated.

I. Tax rates

1. Corporates

No change proposed in tax rates for corporate taxpayers.

2. New Regime *[Section 115BAC]*

i. Tax Rates for Individual/Hindu Undivided Family ('HUF')/Association of Persons ('AOP') [other than co-operative society]/Body of Individuals ('BOI') whether incorporated or not/artificial juridical person are:

a. The new income tax regime is proposed to be extended to AOPs and BOIs as well.

b. The new income tax regime is to become the default tax regime, with an option to taxpayers to continue with the old regime.

c. The option to shift out of the new regime can be exercised only once by a taxpayer earning income from business or profession. However, in case of a taxpayer earning income other than income from business or profession, the option can be exercised on a year on year basis.

d. The limit for eligibility to tax rebate under the new tax regime is enhanced from taxable income of INR 500,000 (~ USD 6,250) to INR 700,000 (~ USD 8,750), in case of individual taxpayers.

e. Highest rate of surcharge is proposed to be reduced from 37% to 25% under the new tax regime in case of taxpayers having annual taxable income exceeding INR 50 million (~USD 625,000), thereby reducing the Maximum Marginal Rate in case of taxpayers opting for the new tax regime to 39%.

f. Tax payable under the new regime to be computed after providing the following deductions:

- Standard deduction of INR 50,000 (~USD 625)

- Income from family pension payable by the employer to a person belonging to the family of an employee in the event of death of the employee
- Amount paid or deposited in Agniveer Corpus Fund by the Central Government.

g. The slab rates under the new tax regime are proposed to be revised as under:

Existing Income tax slabs	Existing Rates of Income tax	Proposed Income tax slabs from 1 April 2023	Proposed Rates of Income tax
Upto INR 250,000	NIL	Upto INR 300,000	NIL
INR 250,001 - INR 500,000	5%	INR 300,001 - INR 600,000	5%
INR 500,001 - INR 750,000	10%	INR 600,001 - INR 900,000	10%
INR 750,001 - INR 1,000,000	15%	INR 900,001 - INR 1,200,000	15%
INR 1,000,001 - INR 1,250,000	20%	INR 1,200,001 - INR 1,500,000	20%
INR 1,250,001 – INR 1,500,000	25%		
Above INR 1,500,000	30%	Above INR 1,500,000	30%

3. **Boost to new manufacturing co-operative societies [*New Section 115BAE, Section 92BA*]**

3. Boost to new manufacturing co-operative societies [*New Section 115BAE, Section 92BA*]

i. It is proposed to provide a concessional tax regime to a new manufacturing co-operative society set up on or after 1 April 2023 and commencing manufacturing or production on or before 31 March 2024.

ii. The proposed tax rates are as under:

   a. The concessional tax rate on income from manufacturing or production is 15% as increased by a surcharge of 10%. The resultant effective tax rate is 17.16%.

   b. Any income which is neither derived from nor is incidental to manufacturing or production, will be taxed at 22% plus applicable surcharge and cess. No deduction or allowance in respect of any expenditure or allowance shall be made in computing such income.

   c. It is proposed to include transactions between the new co-operative society and any other closely connected taxpayer within the meaning of specified domestic transaction. Any profits in excess of the profits as determined by the tax officer shall be deemed to be income of the co-operative society liable to be taxed at 30%.

   d. Short Term Capital Gains ('STCG') from the transfer of non-depreciable capital assets are proposed to be taxed at 22%.

iii. The benefit under the proposed concessional tax regime is subject to various conditions including the condition that the option once exercised cannot be withdrawn.

iv. On failure to comply with the conditions of the proposed section, the option of concessional rate of tax shall be invalid for the year in which failure occurred and the other provisions of the IT Act shall apply to the taxpayer.

v. The benefit of the concessional tax regime is available only if the option is exercised by the new co-operative society in the prescribed manner on or before the due date of filing the return of income.

II. Provisions relating to International Financial Services Centre ('IFSC')

1. Definition of 'Specified Fund' proposed to be widened *[Section 10(4D), Section 47]*

The definition of 'Specified Fund' is proposed to be widened to include a fund regulated under the International Financial Services Centres Authority (Fund Management) Regulations, 2022.

2. Definition of 'Investment Fund' proposed to be widened *[Section 115UB]*

i. The definition of 'Investment Fund' is proposed to be widened to include a fund regulated under the International Financial Services Centres Authority (Fund Management) Regulations, 2022.

ii. The proposed amendment will be effective from 1 April 2022.

3. **Extension of time limit for transfer of assets to resultant fund in IFSC *[Section 47(viiad)]***

   It is proposed to extend the time limit for transfer of assets of the original fund or of its wholly owned special purpose vehicle to a resultant fund located in an IFSC, in case of relocation, from 31 March 2023 to 31 March 2025.

4. **Exemption from income tax on income distributed on offshore derivative instruments *[Section 10(4E)]***

   The exemption available to income arising to a non-resident as a result of transfer of offshore derivative instruments entered into with an offshore banking unit of an IFSC, shall be extended to income distributed on offshore derivative instruments to non-residents by the offshore banking unit of an IFSC.

III. Provisions relating to Transfer Pricing

1. **Reduction in the time limit to submit Transfer Pricing Study Report *[Section 92D]***

   It is proposed to reduce the time period provided to a taxpayer to submit the information and documentation relating to an international transaction i.e. the Transfer Pricing Study Report which is sought by the tax officer or the Commissioner of Income tax (Appeals) ['CIT(A)'] during the course of any proceedings, from 30 days to 10 days, from the date of receipt of a notice by the taxpayer. The taxpayer may make an application to extend the time period for such submission for a further period not exceeding 30 days.

2. **Exclusion of Non-Banking Finance Companies ('NBFCs') from the restriction on interest deduction *[Section 94B]***

   It is proposed to provide a carve out for certain classes of NBFCs so as to exclude such NBFCs (being borrowers) from the scope of Thin Capitalisation Norms which restrict the deduction for interest expense exceeding INR 10 million (~ USD 125,000) on debt provided by an Associated Enterprise which is a non-resident, to 30 per cent of the Earnings before Interest, Taxes, Depreciation and Amortisation ('EBITDA').

IV. *Provisions relating to profits and gains of business or profession*

1. Taxability of benefits and perquisites received in cash *[Section 28]*

i. Currently, the value of any benefit or perquisite, whether convertible into money or not, arising from business or through exercise of a profession is chargeable to tax as business income.

ii. In order to align the language with the intention of the legislature, it is proposed to specifically provided that any benefit or perquisite whether received in cash or in kind or partly in cash and partly in kind shall be included within the scope of benefits and perquisites.

2. Relaxation in the condition for amortisation of preliminary expenditure *[Section 35D]*

i. Currently, expenditure incurred before the commencement of the business in connection with the preparation of a feasibility report or project report or conducting a market survey or any other survey or engineering services, either by the taxpayer himself or by an entity which is approved by the Central Board of Direct Taxes ('CBDT'), can be amortised over a period of five years.

ii. To ease the process, the condition of the approval of the entity by the CBDT is proposed to be removed. The taxpayer will now be required to furnish a statement containing the particulars of the expenditure incurred in the prescribed form and manner to claim the amortisation.

3. Promoting timely payments to MSMEs *[Section 43B]*

i. Section 43B allows a deduction for certain expenditure only on an actual payment basis for a FY, even if the payment is made beyond the due date of making such payment but before furnishing the return of income for the relevant year.

ii. It is proposed to allow a deduction to a taxpayer for the expenditure incurred and payable to a Micro and Small Enterprise only if it is paid within the time specified in section 15 of the Micro, Small and Medium Enterprises Development Act, 2006. The deduction shall not be available in that FY even if it is paid before the due date of furnishing the return of income for that FY.

4. **Increase in the threshold limits for taxation under the presumptive taxation scheme and exemption from tax audit *[Section 44AB, 44AD and 44ADA]***

   i. It is proposed to increase the threshold limits to avail the benefit of the presumptive taxation scheme, with the condition that the amounts received in cash by a non-account payee cheque/draft during the FY do not exceed 5 per cent of total turnover/gross receipts, as follows:

      a. Businesses opting for presumptive scheme – from INR 20 million (~USD 250,000) to INR 30 million (~USD 375,000)
      b. Professions opting for presumptive scheme – from INR 5 million (~USD 62,500) to INR 7.5 million (~USD 93,750)

   ii. It is proposed to provide that receipt of a cheque or a bank draft, other than by an account payee cheque, drawn on the bank is to be deemed as a cash receipt.

iii. It is proposed to exclude such businesses and professions opting for presumptive taxation schemes under increased threshold limits from tax audits.

5. **Preventing misuse of the presumptive taxation schemes available for certain non-residents *[Section 44BB and 44BBB]***

In order to prevent misuse of the presumptive taxation schemes for non-residents engaged in the business of providing services in connection with prospecting, extraction or production of mineral oils or civil construction or erection of plant or machinery in connection with an approved turnkey power project, it is proposed to provide that no offset of brought forward losses or unabsorbed depreciation of past years will be allowed in the FY in which such non-resident declares income on a presumptive basis.

V. Capital gains

1. **Capital gains arising on transfer/sale of Market Linked Debentures (‘MLDs’) [*New Section 50AA*]**

i. It is proposed to introduce a new section to tax gains from transfer or redemption or maturity of MLD as STCG irrespective of the period of holding.

ii. It is further proposed that STCG will be computed after reducing the cost of acquisition and expenditure incurred in connection with transfer or redemption or maturity of MLD from the full value of the consideration. However, no deduction for the securities transaction tax paid will be allowed as a deduction.

iii. The proposed amendment has defined MLD as a security –
   a. Which has an underlying principal component in the form of a debt security; and
   b. Where the returns are linked to market returns or other underlying securities or indices; and
   c. Includes any securities classified or regulated as MLD by Securities and Exchange Board of India ('SEBI').

2. Threshold on deduction for specified long term capital gains *[Sections 54 & 54F]*

i. It is proposed to introduce a cap of INR 100 million (~ USD 1.25 million) on the amount of deduction against eligible long term capital gains arising to an individual or HUF in the following cases:

   a. In the case of transfer of a residential house, where the capital gains are invested by the taxpayer in a new residential house within the period specified in the tax law; and

b. In the case of transfer of any long term capital asset other than a residential house, where the net consideration is invested in a new residential house within the period specified in the tax law.

ii. Further, the taxpayer has the option to invest the capital gains/net consideration in a Capital Gains Account Scheme ('CGAS'), if the taxpayer is not able to fully invest the capital gains/net consideration in the year of transfer or upto the date of filing the return for the FY in which the transfer takes place. The amount to be deposited in the CGAS for claim of deduction is restricted to INR 100 million (~ USD 1.25 million).

3. Cost of improvement and cost of acquisition for intangible assets *[Section 55]*

It is proposed to provide that while computing capital gains, the 'cost of acquisition' and 'cost of improvement' in case of an intangible asset or any other right for which no consideration has been paid for acquisition, is to be considered as nil.

4. Conversion of gold to Electronic Gold Receipts ('EGR') and vice-versa *[Sections 2(42A), 47 and 49]*

i. In order to promote the concept of electronic gold, it is proposed to exclude the conversion of physical form of gold into EGR and vice-versa by a SEBI registered Vault Manager from the purview of 'transfer' for the purpose of capital gains.

ii. It is also proposed that the cost of acquisition of the EGR for the purpose of the computation of capital gains shall be deemed to be the cost of gold in the hands of the person in whose name the EGR is issued and vice-versa.

iii. Further, it is proposed that the holding period of the EGR shall include the holding period of gold held prior to conversion of gold into EGR and vice-versa.

iv. The terms 'Electronic Gold Receipts' and 'Vault Manager' shall have the meanings as defined in SEBI (Vault Managers) Regulations, 2021.

5. Alignment in computing full value of consideration in case of Joint Development Agreement ('JDA') *[Section 45(5A)]*

i. For the purpose of computing capital gains arising to an individual or HUF from the transfer of land or building or both under a under JDA, the full value of consideration comprises the stamp duty value of his share as increased by consideration received in cash, if any.

ii. It is proposed to amend the term 'received in cash' so as to include amount received in cash or by cheque or draft or by any other mode.

iii. The proposed amendment is in line with the language in section 194-IC which provides for withholding tax under JDA.

6. Denial of deduction for interest on borrowed capital in computing cost of acquisition *[Section 48]*

i. Interest paid on borrowed capital for acquiring, constructing, repairing, renewing or reconstructing a property is allowed as a deduction while computing income from house property. Further, in some cases the taxpayers also claim deduction for such interest under the provisions of Chapter VI-A.

ii. In addition to the above, it is observed that certain taxpayers consider the aforesaid interest as part of the cost of acquisition or cost of improvement while computing capital gains on transfer of the property for which the interest expense was incurred.

iii. In order to curb the claim of double deduction, it is proposed that the cost of acquisition shall exclude interest already claimed as a deduction while computing income from house property or under provisions of Chapter VI-A.

VI. Tax reliefs and incentives

1. Rationalisation of exempt income of Life Insurance Policy *[Section 10(10D)]*

i. Currently, income/receipts on redemption of Unit Linked Insurance Policies ('ULIPs') where the premium paid exceeds INR 250,000 (~USD 3,000) is not eligible for exemption.

ii. On similar lines, it is now proposed to provide that income/receipts on maturity of life insurance policies issued on or after 1 April 2023 (other than ULIP) will be taxable if premiums paid on such policies exceed INR 500,000 (~USD 6,000) in aggregate per year, except if the sum is received on the death of the insured.

iii. The scope of other income is proposed to be expanded to include any sum received on maturity of life insurance policies, which are not specifically exempt.

iv. The taxation applicable to life insurance policies issued prior to 1 April 2023 shall remain unchanged as per the Explanatory Memorandum to The Finance Bill, 2023.

2. Timeline for deduction and bring in convertible foreign exchange for a SEZ unit *[Section 10AA]*

i. It is proposed that a unit in a SEZ can avail a deduction from its profits, if the proceeds from sale of goods or provision of services is received in, or brought into, India by the taxpayer in convertible foreign exchange, within a period of six months from the end of the FY or within the prescribed period.

ii. Such amount shall be considered as received in India if the export turnover proceeds are received in an account maintained by the taxpayer outside India with the approval of RBI.

iii. It is proposed to allow the deduction under section 10AA only if the return of income is filed within the due date for submitting the return of income.

3. Exemption to development authorities *[New Section 10(46A)]*

i. It is proposed to exempt the income of a notified Development Authority/Board/Trust/Commission, not being a company, constituted under the Central or the State Acts established for one or more of the following purposes:

   a. Dealing with and satisfying the need for housing accommodation;
   b. Planning, development or improvement of cities, towns and villages; and
   c. Undertaking any activity for the regulation/development of the general public.

4. Withdrawal of exemption to News Agency *[Section 10(22B)]*

It is proposed to withdraw the exemption provided to the income of a notified news agency.

VII. Withholding Taxes

1. **Credit for withholding tax on income already disclosed in the return of income of past years *[Section 155(20)]***

   i. It is proposed to provide that if tax on any income offered in the return of income of a taxpayer has been withheld and deposited with the Government treasury in a subsequent FY, the taxpayer can make an application to the tax officer to claim a credit of such taxes within a period of two years from the end of the FY in which the tax was withheld.

   ii. Upon receipt of such an application, the tax officer is required to grant credit for the withholding tax in the year in which the income has been taxed, by amending the relevant order.

   iii. Where a refund arises as a result of an order passed by the tax officer in consequence of the aforesaid application made by the taxpayer, interest shall be calculated at the rate of 0.5 per cent from the date of application to the date on which the refund is granted.

   iv. The proposed amendment will be effective from 1 October 2023.

2. Withholding tax on payment of accumulated balance due to an employee under the Employees' Provident Fund Scheme *[Section 192A]*

It is proposed to provide that at the time of payment of the accumulated balance due to an employee under the Employees' Provident Fund Scheme, tax will be withheld at the rate of 20 per cent instead of the maximum marginal rate, similar to the provisions of section 206AA, if the recipient of such payment fails to furnish PAN.

3. Withholding tax on payment of interest on securities *[Section 193]*

It is proposed to delete the exclusion carved out from the applicability of withholding tax provisions to any interest on securities issued by a company to a resident in dematerialised form and listed on a recognised stock exchange in India.

4. Withholding tax on winnings from gambling and betting *[Section 194B]*

i. It is proposed to extend the withholding tax provisions which are currently applicable to winnings from lottery or crossword puzzle, to income by way of winnings from gambling or betting of any form. The threshold of INR 10,000 (~ USD 125) will be applied cumulatively for a FY.

ii. It is further proposed to exclude winnings from online games from the scope of this provision and to introduce separate provisions in this regard.

iii. The proposed amendment will be effective from 1 July 2023.

5. Withholding tax on winnings from horse races *[Section 194BB]*

It is proposed to introduce a threshold of INR 10,000 (~USD 125) to be applied cumulatively for a FY in case of withholding tax on winnings from horse races.

6. Withholding tax on cash withdrawals *[Section 194N]*

Withholding tax is applicable at 5 per cent on cash withdrawals aggregating to INR 10 million (~USD 125,000) during the FY, in case the recipients are specified persons who have not filed their return of income for specified FYs. It is proposed to increase this threshold to INR 30 million (~USD 375,000) where the recipient (specified person) is a co-operative society.

7. **Withholding tax on income of Non-Residents on units of a mutual fund *[Section 196A]***

It is proposed to provide that the rate of withholding tax on any income paid to a non-resident in respect of units of a specified mutual fund or from a specified company referred to in the Unit Trust of India (Transfer of Undertaking and Repeal) Act, 2002, shall be the lower of 20 per cent or the rate specified in the relevant Double Taxation Avoidance Agreement, provided the non-resident holds a valid Tax Residency Certificate.

8. **Certificate for lower or nil withholding of tax in case of unitholders of a Business Trust *[Section 197]***

It is proposed to provide that an application for lower or nil withholding certificate of tax can be made by a unit holder in connection with certain incomes payable by a business trust.

9. **Tax deduction at higher rate for non-filers of income tax *[Sections 206AB and 206CCA]***

Relief from the special provision to apply a higher rate of withholding tax/ TCS for non-filing of return of income is proposed to be extended to a person who is not required to file a return of income as notified by the Central Government.

10. TCS under the Liberalised Remittance Scheme and Overseas tour packages *[Section 206C(1G)]*

i. The rate of TCS on foreign remittances for purchase of overseas tour packages or for purposes other than education or medical treatment is proposed to be increased from 5 per cent to 20 per cent.

ii. The proposed amendment will be effective from 1 July 2023.

VIII. Other key proposals

1. Expanding the scope of taxation in hands of an unlisted company on issue of equity shares to non-residents *[Section 56(2)(viib)]*

i. It is proposed to include in the scope of taxable income of an unlisted company, the consideration received from a non-resident for the issue of shares, where such shares are issued at a value higher than their face value. The taxable amount in the hands of the company issuing equity shares would be computed as the consideration received in excess of the fair market value of the shares.

ii. Earlier, the said provision was applicable only to residents.

2. Taxability of unitholders of a Business Trust *[Section 56(2)(xii), 115UA]*

i. The dividend, interest and rent distributed by business trusts (i.e. Real Estate Investment Trusts and Infrastructure Investment Trusts) are accorded a pass-through status at the level of the business trust and are taxable in the hands of the unitholders.

ii. It is proposed to widen the scope of 'other income' to include any sum other than dividend, interest and rental income received by the unitholder which is not chargeable to tax at the trust level. It is proposed to tax such sum distributed by a business trust to the unitholders, as 'other income' of the unit holder.

iii. It is further proposed that in case of redemption of units by the unitholder, such sum received shall be reduced by the cost of acquisition of the units to the extent such cost does not exceed the sum received.

3. **Carry forward and set-off of accumulated loss and unabsorbed depreciation *[Sections 72A and 72AA]***

i. Section 72A relates to provisions allowing carry forward and set-off of business loss and unabsorbed depreciation of the amalgamating company by the amalgamated company in certain situations which includes *inter alia* strategic disinvestment.

ii. To facilitate further strategic disinvestment, it is proposed to amend the definition to include sale of shareholding by the Central/State Government or a Public Sector Company in another Public Sector Company or in a company which results in the following:

   a. Reduction of its shareholding below 51 per cent (where shareholding was more than 51 per cent before such sale); and
   b. Transfer of control to the buyer by the Central Government or State Government or Public Sector Company (or any two of them or all of them).

iii. Further, it is proposed to allow carry forward of accumulated business losses and unabsorbed depreciation in case of amalgamation between one or more banking companies with any other banking institution or a company subsequent to a strategic disinvestment, provided such amalgamation takes place within five years of strategic disinvestment.

iv. The proposed amendment will be effective from 1 April 2022.

4. Carry forward and set-off of losses by certain companies *[Sections 79 and 80-IAC]*

i. It is proposed to provide that eligible start-ups be permitted to carry forward losses for offset against future income for a period of 10 FYs instead of 7 FYs. The other conditions to claim such an offset remain unchanged.

ii. Time limit for incorporation of eligible Start-ups in order to avail tax holiday is proposed to be extended by one year i.e. up to 31 March 2024.

iii. The proposed amendment will be effective from 1 April 2022.

5. Tax on winnings from online games *[Sections 115BBJ and 194BA]*

i. It is proposed to insert a new section to tax the net winnings earned from any online games (as defined) at 30 per cent. The method to compute such winnings shall be prescribed. The payer will be required to deduct tax at the rates in force.

ii. It is further proposed that in case there are withdrawals from the user account during the FY, tax needs to be deducted at the time of such withdrawal and in addition, tax is deductible on the remaining amount of net winnings at the end of the FY.

iii. The proposed amendment relating to withholding tax will be effective from 1 July 2023.

6. Alternate Minimum Tax (‘AMT’) payable by persons other than company *[Sections 115JC and 115JD]*

It is proposed to exclude co-operative societies which opt for tax under the new tax regime from the provisions of AMT and from claiming a tax credit for AMT.

7. Extension of deeming provision of gifting to Resident but not ordinarily resident *[Section 9]*

i. Currently, any sum of money exceeding INR 50,000 (~USD 625) received by a non-resident without consideration from a person resident in India on or after 5 July 2019 is deemed to accrue or arise in India.

ii. It is proposed to extend this deeming provision to any sum of money exceeding INR 50,000 (~USD 625) received without consideration by an individual who is ‘Resident but not ordinarily resident’ from a person resident in India.

8. **Leave Encashment *[Section 10(10AA)]***

It is proposed to increase the tax exemption limit for leave encashment on retirement of non-government salaried employees. A notification on the amount of exemption is awaited.

9. **Provisions relating to charitable and religious trusts or institutions [*Sections 10(23C), 11, 12A and 115TD*]**

i. It is proposed that the application of donations out of the corpus or repayment of loans or borrowings after 31 March 2021 should not be considered as an application of income for charitable or religious purposes. It is proposed to introduce a time limit of five years for redeposit of amounts withdrawn or repayment of loans or borrowings into the corpus.

ii. It is proposed to consider only 85 per cent of the eligible donations made by a trust or institution to another trust or institution as application of such donation for charitable or religious purposes.

iii. It is proposed to levy exit tax at Maximum Marginal Rate on its accreted income (net assets) where the trust gets merged with a non-charitable entity or a charitable trust/institution but with a different object.

10. Computation of perquisite on rent free/concessional housing accommodation *[Section 17]*

It is proposed to introduce a uniform methodology to compute of the perquisite value of rent free accommodation and accommodation provided at a concessional rate by an employer to its employees. Rules will be prescribed in this regard.

11. Time limit for filing the return of income in case of income escaping assessment *[Section 148]*

It has been proposed to provide that a return of income in response to a notice for reassessment shall be filed within three months from the end of the month in which such notice is issued, or within such further time as may be allowed by the tax officer. The return of income filed beyond the period allowed shall not be considered.

12. Time limit for completion of assessment (audit) proceedings *[Section 153]*

i. The time limit for completion of assessment proceedings from FY 2021–22 onwards is proposed to be increased to 24 months from the end of the relevant FY.

ii. Where an updated return of income is submitted, the time limit for completion of assessment proceedings is proposed to be increased to 24 months from the end of the FY in which the updated return is submitted.

13. **Amendment relating to the determination of income of successor entity after Business reorganisation *[Section 170A]***

   i. In case of business reorganisation, the successor entity is required to file a modified return in the prescribed form within six months from the end of the month of receipt of the order of the High Court or Income Tax Appellate Tribunal ('ITAT') or Adjudicating Authority under the Insolvency and Bankruptcy Code.

   ii. It is proposed to provide the procedure to be followed by the tax officer after the modified return is submitted by the successor entity as under:

      a. Where proceedings of assessment or reassessment for the relevant year have been as completed on the date of submitting the modified return, the tax officer shall pass an order modifying the taxable income in accordance with the order of the business reorganisation and the modified return.

      b. Where proceedings of assessment or reassessment for the relevant year are pending as on the date of submitting the modified return, the tax officer shall pass an order assessing or reassessing the taxable income in accordance with the order of the business reorganisation and modified return.

14. Rationalization of the appeal procedure *[Section 253]*

i. It is proposed to provide enabling provisions for taxpayers to file an appeal to the ITAT i.e. the second level appellate authority where such a remedy is currently not available.

ii. It is proposed to permit tax officers to file cross objections to the ITAT, in cases where an appeal is filed by the taxpayer to the ITAT against the order of the Dispute Resolution Panel.

15. Introduction of new authority for appeals *[Section 246]*

i. To reduce the burden of Commissioner of Income Tax (Appeals) i.e. the first level appellate authority, it is proposed to appoint Joint Commissioner (Appeals) ['JCIT(A)'] for adjudicating appeals against certain specified orders.

ii. The JCIT(A) shall have the powers, responsibilities, and accountability similar to that of the Commissioner of Income Tax (Appeals) with respect to the procedure for disposal of appeals.

16. Withholding of refund and interest payable on refund *[Sections 244A and 245]*

i. It is proposed to replace the existing provisions dealing with set off and withholding of refunds with a proposal to set off the amount payable against the refund due after issuing an intimation in writing to the taxpayer.

ii. If the tax officer is of the opinion that the grant of the net amount of refund after set off is likely to adversely affect the interest of the Revenue due to pending tax proceedings, the tax officer may withhold refund up to the date of completion of the tax proceedings. The tax officer may do so by recording the reasons in writing and with prior approval of the prescribed higher authorities.

iii. Currently, the IT Act provides an additional interest on refund at the rate of 3 per cent per annum for the period beginning from the date following the last date of expiry of the time limit to complete tax proceedings to the date on which refund is granted. This is applicable only in a case where a refund arises to give effect to an order passed by the higher appellate forums/Tribunals/Courts without any fresh tax proceeding being carried out.

iv. It is now proposed that in case tax proceedings are pending, the period for determining the additional interest on the refund will exclude such period from the date on which the refund is withheld by the tax officer till the date on which such tax proceedings are completed.

17. Penalty for failure to deduct tax at source or pay such tax to the Government *[Section 271C]*

i. It is proposed to expand the applicability of penalty on failure to pay tax to cases where the payer is required to ensure that tax has been paid to the Government where the consideration is paid in kind.

ii. Further, it is proposed to include defaults in payment of withholding tax relating to winnings from online games, perquisites or benefits provided in respect of business and profession and payments on transfer of Virtual Digital Asset (‘VDA’) within the ambit of penalty provisions.

iii. The proposed amendments in the penalty provisions relating to tax deduction on providing perquisites/benefits and payment on transfer of VDA will be effective from 1 April 2023.

iv. The proposed amendment in the penalty provision relating to tax deduction on winnings from online games will be effective from 1 July 2023.

18. **Prosecution on failure to pay tax withheld at source to the Government *[Section 276B]***

It is proposed to include defaults in payment of withholding tax relating to winnings from online games, perquisites/benefits in respect of business or profession and payments for transfer of VDA within the scope of prosecution provisions.

19. **Penalty for submitting inaccurate statement of financial transactions or reportable account *[Section 271FAA]***

    i. Currently based on the provisions of the Act, where a person furnishes inaccurate statement of financial transactions or reportable account, a penalty of INR 50,000 (~USD 625) is levied on such person.

    ii. It is proposed to levy additional penalty of INR 5,000 (~USD 60) on such person where inaccuracy is on account of false or inaccurate information submitted by the account holder. Further, such person can recover the penalty so paid from the account holder or retain out the money which is in his possession.

Indirect taxes

This section summarizes some of the significant indirect tax proposals announced in Budget 2023-24.

I. *Customs Duty*

i. Review of Customs Duty exemptions done – Out of 196 exemptions, 146 are proposed to be extended by one year up to 31 March 2024. A few of the remaining exemptions are proposed to be extended by one, two or five years while some exemptions are proposed to be withdrawn with effect from 31 March 2023.

ii. Some Items for which Basic Customs Duty has been increased with effect from 2 February 2023 are as follows:

Name of Item	Existing rate	Proposed rate
Compounded Rubber	10%	Lower of 25% or INR 30 per kg
Articles of precious metals	20%	25%
Imitation Jewellery	Higher of 20% or INR 400 per kg	Higher of 25% or INR 600 per kg
Electric Kitchen Chimney	7.5%	15%
Bicycles	30%	35%
Toys and parts of toys	60%	70%

iii. Some items for which Basic Customs Duty rates have been changed with effect from 2 February 2023 are as follows:

Name of Item	Existing rate	Proposed rate
Pecan nuts	100%	30%
Naphtha	1%	2.5%
Silver, unwrought or semi-manufactured forms or in powder form	7.5%	10%
Silver Dore	6.1%	10%
Camera lens and inputs/parts for manufacture of cellular mobile phones	2.5%	Nil
Heat coil for use in manufacture of Electric Kitchen Chimneys	20%	15%
Denatured ethyl alcohol for use in manufacture of industrial chemicals	5%	Nil
Seeds used for lab grown diamonds	5%	Nil
Specified parts for open cell pf TV panel	5%	2.5%
Vehicle (including electric vehicles) in Semi-Knocked Down form	30%	35%
Vehicle in Completely Built Unit form	60%	70%
Specified capital goods for manufacture of lithium ion cells used in battery of EVs	As applicable	Nil

iv. Owing to rationalisation of Basic Customs Duty rate structure, certain specified goods are proposed to be exempted from Social Welfare Surcharge (‘SWS’). A few items are silver, gold & imitation jewellery, bicycles, motor vehicles including electrically operated vehicles, toys and parts of toys

v. Agriculture Infrastructure and Development Cess (‘AIDC’) on certain specified items is proposed to be increased, in some cases consequent to change in effective rate of customs duty, while in others without any change in effective rate of Customs Duty. A few items are silver and silver dore, platinum other than rhodium, aero planes and other aircraft.

II. Excise Duty

i. Upward revision of approximately 16 per cent in specific rates of National Calamity Contingent Duty (‘NCCD’) as duty of excise on specified cigarettes with effect from 2 February 2023.

ii. Exemption is proposed on blended Compressed Natural Gas (‘CNG’) equal to the Goods and Services Tax (‘GST’) paid on bio gas / compressed bio gas contained in such blended CNG.

III. Goods and Services Tax

The following amendments will come into effect from a date to be notified, unless otherwise specified:

A. Amendments in CGST ACT, 2017

i. Input Tax Credit (‘ITC’) shall not be available in respect of goods or services which are used for activities relating to obligations under Corporate Social Responsibility (‘CSR’).

ii. In case of non-payment to any supplier within 180 days from the date of issue of invoice, amount of ITC availed by the recipient shall be paid by him along with interest and then the recipient can claim credit thereof on payment of consideration to the supplier.

iii. A maximum time limit of up to three years is provided to furnish GST Returns viz. GSTR-1 (Outward supplies), GSTR-3B (Summary Return), GSTR-9 (Annual Return) and GSTR-8 (Collection of tax) from their respective due dates of filing.

iv. A retrospective amendment with effect from 1 July 2017 has been made to provide that persons exempted from registration need not get registered under GST provisions.

v. The provision relating to interest on delayed refunds has been amended to prescribe the manner of computation of period of delay beyond 60 days from the date of receipt of application till the date of refund.

vi. A new provision has been introduced to allow consent based sharing of information submitted by taxable person in his return or in his application of registration or in his statement of outward supplies, or the details uploaded by him for generation of electronic invoice or E-way bill or any other details, as may be prescribed, on the common portal with such other systems, as may be notified.

vii. A retrospective amendment with effect from 1 July 2017 has been proposed to treat the activities of high seas sales, supply of warehoused goods before clearance and supply by endorsement of documents of title before clearance for home consumption as neither supply of goods nor supply of services as mentioned in Schedule III. It is clarified that no refund will be granted for GST already paid in respect of such activities during the period from 1 July 2017 to 31 January 2019.

viii. In the case of an Electronic Commerce Operators, a new provision has been introduced to provide for penalty of an amount being higher of INR 10,000 (~USD 125) or amount of tax involved for contravening provisions relating to supplies of goods made through them by unregistered persons or composition taxpayers.

ix. Provisions relating to punishment for offences have been amended to decriminalise certain offences like obstructing or preventing officer in discharge of his duties, tampering or destroying any material evidence or documents and failing to supply information or supplying false information. The monetary limit for initiating prosecution for offences has also been enhanced to INR 20 million (~USD 250,000) [from INR 10 million (~USD 125,000) earlier].

x. Persons involved in offences relating to issuance of invoices without supply of goods or services or both have been excluded from the option of compounding of offences.

xi. Further, amount for compounding of offences have also been rationalised by reducing the range for compounding from 25 per cent to 100 per cent of GST (from 50 per cent to 150 per cent earlier).

B. Amendments in IGST Act, 2017

In case of transportation of goods outside India where both the supplier and recipient are located in India, the place of supply will be the location of the recipient in case of a registered person or the location at which such goods are handed over for transportation in case of an unregistered person. Prior to the amendment, the place of supply was the place of destination of such goods.

Abbreviations

AMT	: Alternate Minimum Tax	JDA	: Joint Development Agreement
AOP	: Association of Persons	JCIT(A)	: Joint Commissioner of Income-Tax (Appeals)
BOI	: Body of Individuals	LGD	: Lab Grown Diamond
CGST	: Central Goods and Services Tax	MSMEs	: Micro, Small and Medium Enterprises
CIT(A)	: Commissioner of Income-Tax (Appeals)	MLD	: Market Linked Debenture
CBDT	: Central Board of Direct Taxes	NCCD	: National Calamity Contingent Duty
CGAS	: Capital Gains Account Scheme	NBFC	: Non-Banking Financial Company
CNG	: Compressed Natural Gas	PM	: Prime Minister
FM	: Finance Minister	PAN	: Permanent Account Number
FY	: Financial Year	RBI	: Reserve Bank of India
GST	: Goods and Services Tax	SGST	: State Goods and Services Tax
GIFT	: Gujarat International Fin-Tech City	STCG	: Short Term Capital Gains
HUF	: Hindu Undivided Family	SEZ	: Special Economic Zone
IFSC	: International Financial Services Centre	SEBI	: Securities and Exchange Board of India
IGST	: Integrated Goods and Services Tax	The IT Act	: The Income-tax Act, 1961
INR	: Indian Rupee	TCS	: Tax Collected at Source

IFSCA	: International Financial Services Centre Authority
ITAT	: Income Tax Appellate Tribunal
ITC	: Input Tax Credit
USD	: US Dollar
VDA	: Virtual Digital Asset

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JMP Advisors offers advice in international taxation, domestic taxation, transfer pricing, mergers and acquisitions, Goods and Services Tax (GST), business laws and exchange control regulations and foreign investment consulting. We specialize in fiscal strategy, policy foresight and advocacy matters and are trusted advisors to high networth families. Our team at JMP Advisors takes pride in being the best at what matters most to clients - technical expertise, innovative solutions, consistent, high quality service, reliability and ease of doing business.

JMP Advisors has been recognised as a leading Tax firm in India, *inter alia*, in the International Tax Review (Euromoney) World Tax Directory for all successive years since incorporation, including in the World Tax and Transfer Pricing 2023 Directory.

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