

Tax Hotline

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INCOME-TAX BILL, 2025: IMPACT ON NON-RESIDENTS

This article was first published in the monthly journal of the Chamber of Tax Consultants for March 2025.



In a major overhaul of tax regime in India, the government has proposed to repeal the existing tax law enacted over six decades back. The reform is based on three core principles: simplifying language and structure for improved coherence, maintaining existing tax policies, and avoiding any changes to tax rates

While no major changes have been proposed, in this article, we discuss the impact of language changes in the new bill on non-residents. We discuss the changes to the provisions in relation to scope of total income of non-residents, indirect transfer provisions, manner of carry forward of capital losses and changes to transfer pricing provisions. We also discuss the changes in relation to interpretation of terms used but undefined in tax treaties. Lastly, the article also elaborates on impact of repeal on past assessments/ audits and proceedings.

Please click [here](#) for our detailed article.

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