

TP - RAM (Roadmap And Mission) Expected

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With the upcoming interim budget, action now shifts from Ayodhya to North Block. From the prasad distribution after the consecration of Lord RAM to the recent halwa ceremony that marks the commencement of the process of printing the Union Budget, we can expect some amendments in Transfer Pricing (TP) for its own RAM - 'Roadmap And Mission', for global alignment and building an investor friendly regime, be it in compliance or litigation.

With MNEs, global conglomerates and investors from around the world eager to invest in India, India is the new growth story, and the goal is to increase these financial flows to generate new opportunities. The onus is on the Government to maintain the traction and enhance the feeling of mutuality.

With the above in mind, the taxpayers certainly have some expectations in the TP domain. The government should bring in certain changes/ guidelines such that it results in ease of doing business, the country becomes a preferred investment destination and the tax regime/ litigation structure that moves towards a non-adversarial regime to support the same.

Concerning TP, the government has recently notified certain changes in the Safe Harbour Provisions recently. With the tone already set, the time is ripe for some more introspection and changes. Following are some of the key areas that could require attention in this Interim Union Budget 2024.