

School of Law

Bachelor of Law
ETE - May 2023

Time : 3 Hours

Marks : 50

Sem VI - BLLB3031 - INTERNATIONAL TAXATION

Your answer should be specific to the question asked

Draw neat labeled diagrams wherever necessary

1. Explain the difference between direct tax and indirect tax? K1 CO1 (2)
2. How does international tax act as a challenge between developing and developed nations? K2 CO2 (2)
3. Single tax principle has been developed to solve the problem of double taxation. Explain the principle. K3 CO3 (2)
4. What is first bite of the apple rule. K3 CO4 (2)
5. In case of transfer pricing, who has the burden of proof to show that appropriate method has been followed. K4 CO5 (2)
6. What are different types of advance rulings and how are they relevant. K3 CO1 (5)
7. Any kind of prior agreement can prevent future disputes. In context of the above statement, explain the difference between Mutual Agreement Procedure and Advance Pricing Agreement. K4 CO2 (5)
8. There are specific methods to determine tax liability using arm's length principle. What are there different methods. K6 CO6 (6)
9. The resident status of different entities is determined majorly through the "control and management." What is meant by control and management? K4 CO3 (8)
10. **Who are associated entities in terms of transfer pricing regulation.** K5 CO4 (8)
11. **Explain the concept of foreign tax credit with example.** K6 CO5 (8)