



## **COURSE MANUAL**

**Name of the Elective Course:  
Corporate Taxation**

**Course Code: L-EL-0087**

**Name of the responsible Faculty Instructor:  
Prof. CA Kriti Chawla**

**Fall 2026  
(AY2025-26)**

This document is prepared by the course instructor and contains basic information relevant to the execution of the course. It is the official record for all intents and purposes as far the elective course, *Corporate Taxation*, is concerned.

This course manual can be used as a general guide to the subject. However, the instructor can modify, extend or supplement the course (without tampering its basic framework and objectives) for the effective and efficient delivery of the course. The instructor will provide students with reasons for such changes.

## **Part I**

Course Title: **Corporate Taxation**

Course Code: **L-EL-0087**

Course Duration: **One Semester (14 Weeks)**

No. of Credit Units: **04 Credits**

Level: **UG and PG**

Medium of Instruction: **English**

Pre-requisites (if applicable): **Law of Taxation**

Equivalent Courses: **N/A**

### 1. Course Description

This course is designed to equip law students with a strong foundation in corporate taxation by introducing them to the legal, commercial, and strategic dimensions of taxation in India. Whether advising start-ups, multinational corporations, investors, or government bodies, an understanding of taxation has become indispensable for lawyers working in corporate law, mergers and acquisitions, dispute resolution, international trade, and regulatory practice.

The course examines the architecture of corporate taxation under Indian law, with primary focus on the direct tax (Income-tax Act), indirect tax (Goods and Services Tax) and international tax principles.

Students will engage with fundamental concepts such as treatment of companies as a separate tax entity, corporate residence incorporating detailed analysis of Place of Effective Management (PoEM) rules, determination of business income including corporate income tax incentives by way of certain exempt incomes and permissible deductions.

A significant component of the course is devoted to the interaction between direct and indirect taxation in corporate operations, particularly the relationship between corporate tax and the Goods and Services Tax (GST) regime. Students will examine how GST impacts commercial transactions, supply chains, contracts, e-commerce operations, and corporate structuring decisions. The course will further explore practical issues relating to registration, input tax credit, compliance obligations, litigation under GST, and the evolving jurisprudence surrounding indirect taxation in India. Through this integrated approach, students will develop a holistic understanding of how both corporate tax and GST influence business strategy, regulatory compliance, and commercial risk management.

From the perspective of international taxation, the course will examine the operation and interpretation of Double Taxation Avoidance Agreements (DTAAs), cross-border taxation principles, treaty abuse mechanisms, and evolving global tax standards as they relate to corporations around the world. Particular emphasis will be placed on anti-avoidance frameworks, including the General Anti-Avoidance Rules (GAAR) and Specific Anti-Avoidance Rules (SAAR), especially transfer pricing regulations governing multinational enterprises and related-party transactions.

The course will also introduce students to the Base Erosion and Profit Shifting (BEPS) framework developed by the Organisation for Economic Co-operation and Development (OECD) and endorsed by the G-20 nations to address aggressive tax planning, profit shifting, and tax avoidance by multinational enterprises. Students will examine the historical development of the BEPS project, its policy objectives, and its growing influence on international corporate taxation. The course will provide an overview of the BEPS Action Plans, with particular focus on transfer pricing, treaty

abuse prevention, digital economy taxation, and global anti-avoidance measures, while also analysing their implementation and impact within the Indian tax regime.

Students will also study contemporary institutional and procedural reforms in Indian tax administration, including the transition from the Authority for Advance Rulings (AAR) to the Board for Advance Rulings (BAR), and the legal and administrative rationale underlying these changes. Further emphasis will be placed on technological and procedural developments such as faceless assessments, faceless appeals, and the increasing digitization of tax administration under both the Income-tax and GST frameworks.

By the end of the course, students should be able to interpret and apply key principles of corporate tax law, evaluate the tax implications of complex commercial transactions, assess litigation risks, and appreciate the strategic role of taxation in modern corporate legal practice. The course is particularly valuable for students intending to pursue careers in corporate law firms, tax advisory and consulting practices, litigation chambers, multinational corporations, policy institutions, and academia.

## 2. Teaching Methodology

In-class lectures shall be conducted by the course Instructor. Students are required to prepare for lectures and tutorials to participate in class.

## 3. Intended Learning Outcomes

Course Intended Learning Outcomes	Weightage in %	Teaching and Learning Activities	Assessment Tasks/ Activities
<b>By the end of the course, Students should be able to</b>			
Understand the statutory and policy framework governing corporate taxation and taxation of business entities in India.	20%	Lectures, classroom discussions, statutory interpretation exercises	Mid-semester examination  Tutorials  Students' ability to describe and explain the corporate tax framework in India with the help of presentations, research papers and/or case studies.

<b>Course Intended Learning Outcomes</b>	<b>Weightage in %</b>	<b>Teaching and Learning Activities</b>	<b>Assessment Tasks/ Activities</b>
<b>By the end of the course, Students should be able to</b>			
Analyse corporate residence principles including PoEM, business income, deductions as they pertain to corporations. Also, understand the interplay between corporate taxation and indirect tax regime including the implication of GST on corporates	30%	Case law analysis, problem-solving exercises, in-class discussions	Mid-semester examination, End-term Examination  Tutorials
Interpret and apply international tax principles to corporates including anti-avoidance principles, transfer pricing rules, BEPS measures. Also, develop understanding of dispute resolution mechanisms, tax compliance, and emerging developments in corporate taxation	30%	In-class discussions, case law analysis. Students, will, by responding to questions and performing exercises, develop their analytical and critical capabilities to discuss vexed issues concerning corporate tax law.	Mid-semester examination, End-term Examination, Presentation  Tutorials  All these assessments/ tasks and activities shall be essential to determine their ability to apply legal principles to a given factual situation.
Apply principles as discussed to solve legal problems by: <ul style="list-style-type: none"> <li>• Conducting in-dept research on the issue in question</li> <li>• Analysing and innovating to resolve</li> </ul>	20%	Students shall be required to research on specific topics of tax disputes.  In lectures, students shall be shown how legal problems are solved by applying	End-term examination  Students will be required to make presentations on problems and questions allotted to them.

Course Learning Outcomes	Intended	Weightage in %	Teaching and Learning Activities	Assessment Tasks/ Activities
<b>By the end of the course, Students should be able to</b>				
problems concerning taxation of corporations <ul style="list-style-type: none"> <li>Communicating their solutions orally and in writing in a clear, coherent and accurate manner.</li> </ul>			principles of tax law to corporates.  Students shall be required to give presentations on selected topics in which they shall evaluate issues	All students will be required to participate and contribute to tutorial discussions whether by means of a presentation, research etc.

#### 4. Grading of Student Achievement

To pass this course, students shall obtain a minimum of 40% in the cumulative aspects of coursework, i.e., internal assessments (including moot court, mid-term exam, presentations, research paper) and the end term examination. Internal assessments shall carry a total of 70 marks. **End of semester exam shall carry 30 marks out of which students have to obtain a minimum of 30% marks to fulfil the requirement of passing the course.**

The details of the grades as well as the criteria for awarding such grades are provided below:

PERCENTAGE OF MARKS	GRADE	GRADE VALUE	GRADE DESCRIPTION
80 and above	O	8	<b>Outstanding</b> – Exceptional knowledge of the subject matter, thorough understanding of issues; ability to synthesize ideas, rules and principles and extraordinary critical and analytical ability
75 – 79	A+	7.5	<b>Excellent</b> - Sound knowledge of the subject matter, thorough understanding of issues; ability to synthesize ideas, rules and principles and critical and analytical ability
70 – 74	A	7	<b>Very Good</b> - Sound knowledge of the subject matter, excellent organizational capacity, ability to synthesize ideas, rules and principles, critically analyze existing

PERCENTAGE OF MARKS	GRADE	GRADE VALUE	GRADE DESCRIPTION
			materials and originality in thinking and presentation
65 – 69	A-	6	<b>Good</b> - Good understanding of the subject matter, ability to identify issues and provide balanced solutions to problems and good critical and analytical skills
60 – 64	B+	5	<b>Fair</b> – Average understanding of the subject matter, limited ability to identify issues and provide solutions to problems and reasonable critical and analytical skills
55 – 59	B	4	<b>Acceptable</b> - Adequate knowledge of the subject matter to go to the next level of study and reasonable critical and analytical skills.
50 – 54	B-	3	<b>Marginal</b> - Limited knowledge of the subject matter and irrelevant use of materials and, poor critical and analytical skills
45 – 49	P1	2	<b>Pass 1</b> – Pass with basic understanding of the subject matter
40 – 44	P2	1	<b>Pass 2</b> – Pass with rudimentary understanding of the subject matter
Below 40	F	0	<b>Fail</b> - Poor comprehension of the subject matter; poor critical and analytical skills and marginal use of the relevant materials. Will require repeating the course
Incomplete	I	0	<b>Incomplete</b> - “Extenuating circumstances” preventing the student from taking the end-semester, or re-sit, examination as the case may be; the Vice Dean (Examinations) at their discretion assign the “I” grade. If an "I" grade is assigned, the student would appear for the end-semester, or re-sit examination, as the case may be, as and when the subsequent opportunity is provided by the University.

## 5. Criteria for Student Assessments

Assessment of the participants will be based on the following criteria.

Assessment	Weightage	Remarks
Internal Assessment	70 Marks	To be decided by the Course Instructor
End Semester Examination (Compulsory)	30 Marks	There will be a compulsory end-semester examination/component for all participants of the course who have successfully met the requisite attendance as per the governing JGU policies.

### Part III

#### Course/Class Policies

##### Academic Integrity and Plagiarism

Learning and knowledge production of any kind is a collaborative process. Collaboration demands an ethical responsibility to acknowledge who we have learnt from, what we have learned, and how reading and learning from others have helped us shape our own ideas. Even our own ideas demand an acknowledgement of the sources and processes through which those ideas have emerged. Thus, all ideas must be supported by citations. All ideas borrowed from articles, books, journals, magazines, case laws, statutes, photographs, films, paintings, etc., in print or online, must be credited with the original source. If the source or inspiration of your idea is a friend, a casual chat, something that you overheard, or heard being discussed at a conference or in class, even they must be duly credited. If you paraphrase or directly quote from a web source in the examination, presentation or essays, the source must be acknowledged. The university has a framework to deal with cases of plagiarism. All form of plagiarism will be taken seriously by the University and prescribed sanctions will be imposed on those who commit plagiarism.

##### Disability Support and Accommodation Requirements

JGU endeavours to make all its courses inclusive and accessible to students with different abilities. In accordance with the Rights of Persons with Disabilities Act (2016), the JGU Disability Support Committee (DSC) has identified conditions that could hinder a student's overall well-being. These include physical and mobility related difficulties, visual and hearing impairment, mental health conditions and intellectual/learning difficulties e.g., dyslexia, dyscalculia. Students with any known disability needing academic and other support are required to register with the Disability Support Committee (DSC) by following the procedure specified at <https://jgu.edu.in/disability-support-committee/>

Students who need support may register before the deadline for registration ends, as communicated by the DSC via email each semester. Those students who wish to continue receiving support from the previous semester, must re-register every semester prior to the deadline for re-registration as communicated by the DSC via email. Last minute registrations and support are discouraged and might not be possible as sufficient time is required to make the arrangements for support.

The DSC maintains strict confidentiality about the identity of the student and the nature of their disability and the same is requested from faculty members and staff as well. The DSC takes a strong stance against in-class and out-of-class references made about a student's disability without their consent and disrespectful comments referring to a student's disability. With due respect for confidentiality, faculty and students are encouraged to have honest conversations about the needs of students with disabilities and to discuss how a course may be better tailored to cater to a student with disability.

All general queries are to be addressed to [disabilitysupportcommittee@jgu.edu.in](mailto:disabilitysupportcommittee@jgu.edu.in)

### **Safe Space Pledge**

This course may discuss a range of issues and events that might result in distress for some students. Discussions in the course might also provoke strong emotional responses. To make sure that all students collectively benefit from the course, and do not feel disturbed due to either the content of the course or the conduct of the discussions. Therefore, it is incumbent upon all within the classroom to pledge to maintain respect towards our peers. This does not mean that you need to feel restrained about what you feel and what you want to say. Conversely, this is about creating a safe space where everyone can speak and learn without inhibitions and fear. This responsibility lies not only with students, but also with the instructor.

P.S. The course instructor, as part of introducing the course manual, will discuss the scope of the Safe Space Pledge with the class.

## **Part IV**

### **Keywords Syllabus**

Corporate Taxation, Income-tax, Business Income, Capital Gains, Goods and Services Tax, International Taxation, Transfer Pricing, Double Taxation Avoidance Agreements, Permanent Establishment, GAAR, BEPS, Mergers and Acquisitions Taxation, Tax Litigation, Tax Compliance, Digital Economy Taxation, Cross-border Transactions, Corporate Restructuring, Withholding Tax, Tax Treaties, Place of Effective Management, Global Minimum Tax.

## Course Design and Overview (Weekly Plan)

<b>Week</b>	<b>Topics</b>
1	<b>Fundamentals of Corporate Taxation</b> <ul style="list-style-type: none"><li>• Evolution of corporate taxation in India</li><li>• Corporate personality and separate legal existence</li><li>• Tax Entity Classification: Companies, LLPs, Partnerships, Start-ups, Foreign corporations etc.</li><li>• Introduction to corporate tax principles</li></ul>
2	<b>Corporate Residency</b> <ul style="list-style-type: none"><li>• Significance of Corporate Residency</li><li>• Residential status of companies</li><li>• Place of Incorporation-Place of Effective Management (POEM)</li><li>• Comparative analysis of Control &amp; Management Test with POEM</li></ul>
3	<b>Corporate Income and Business Profits</b> <ul style="list-style-type: none"><li>• Scope of taxable business income</li><li>• Revenue and capital receipts</li><li>• Revenue and capital expenditure</li><li>• Deductions and business incentives</li><li>• Losses and set-offs</li></ul>
4-5	<b>International Taxation and Tax Treaties</b> <ul style="list-style-type: none"><li>• Residence v. source-based taxation</li><li>• Collusion of taxing rights</li><li>• Double taxation: Meaning and Types</li><li>• Objects and purpose of Double Taxation Avoidance Agreements (DTAA)</li><li>• Methods for relief of double taxation</li><li>• Permanent establishments and Business Connection</li></ul>
6-7	<b>Tax Evasion and Tax Avoidance</b> <ul style="list-style-type: none"><li>• Tax Evasion and Avoidance: Meaning and Difference</li><li>• Introduction to BEPS</li><li>• Concept of Substance over form</li><li>• General Anti-Avoidance Rules (GAAR)</li><li>• Limitation of benefits clauses (LoB)</li><li>• Treaty override: Treaty shopping</li></ul>
8	<b>Introduction to Transfer Pricing Law</b> <ul style="list-style-type: none"><li>• Transfer Pricing: Need and Concept</li><li>• Arm's Length Principle: Article 9 of the OECD/UN Model Tax Convention</li><li>• Sources of Transfer Pricing Law</li><li>• Transfer Pricing Law: Indian Provisions</li></ul>

	<ul style="list-style-type: none"> <li>• Key Concepts in Transfer Pricing: <ul style="list-style-type: none"> <li>○ Associated Enterprises</li> <li>○ International Transactions</li> </ul> </li> <li>• Transfer Pricing Documentation</li> </ul>
9-10	<p><b>Interplay of Corporate Tax and Goods and Services Tax (GST)</b></p> <ul style="list-style-type: none"> <li>• Background of GST</li> <li>• The role and importance of GST Council</li> <li>• GST levies (CGST, SGST and IGST, GST Compensation Cess)</li> <li>• GST Tax slabs</li> <li>• Registration under GST</li> <li>• Introduction to Input Tax Credit</li> </ul>
11-12	<p><b>Compliances and Dispute Resolution</b></p> <ul style="list-style-type: none"> <li>• Compliance framework for Corporates in India</li> <li>• Traditional litigation / appellate framework</li> <li>• Alternate Dispute Resolution Mechanism</li> <li>• Dispute Resolution Panel – scope and review of performance</li> <li>• MAP, APA, Safe Harbours</li> <li>• Faceless Assessment Scheme &amp; Tax Amnesty Scheme [Vivad Se Vishwas Scheme]</li> <li>•</li> </ul>
13	<p><b>Emerging Issues and Future of Corporate Taxation</b></p> <ul style="list-style-type: none"> <li>• AI and taxation</li> <li>• Cryptocurrency taxation</li> <li>• ESG taxation</li> <li>• Carbon taxes</li> <li>• Future of digital economy taxation</li> </ul>
14	<p style="text-align: center;"><b>REVISION WEEK</b></p> <p>[NOTE: There shall be teaching classes scheduled during the fourteenth week subject to the JGU Academic Calendar circulated by the Office of the Registrar, JGU and any official declaration of non-working days by the JGU Registrar.]</p>

### Part V Relevant Readings

1. Principles of Taxation Law by Dr. Girish Ahuja, Dr. Ravi Gupta & CA Kriti Chawla 2nd Reprint Edition, 2025, Commercial Law Publishers
2. Dr. Girish Ahuja, Dr. Ravi Gupta, Simplified Approach to Corporate Tax Planning & Management, Latest Edition, Commercial Law Publishers
3. Shome, Parthasarthy; Taxation Principles and Applications A Compendium, LexisNexis, 2014 (Latest Edition)

4. Shome, Parthasarthy; Challenges in Domestic & International Taxation Emerging Indian Experience, OakBridge, 2018 (Latest Edition)
5. Transfer Pricing: The Indian Landscape Two Decades On, Mukesh Butani, LexisNexis, 2021
6. Guidance Note on Report Under Section 92E of the Income-tax Act, 1961 (Transfer Pricing), ICAI
7. Roy Rohatgi on International Taxation, Volume 1: Principles, IBFD, 2018 (Latest Edition)

### **Statutory References**

- Income-tax Act, 191
- Income-tax Act, 2025
- CGST Act, 2017