

# Tax Hotline

March 08, 2025

## 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.

### Authors

- Morvi Chaturvedi, Ipsita Agarwalla and Parul Jain

You can direct your queries or comments to the relevant member.

### DISCLAIMER

The contents of this hotline should not be construed as legal opinion. View detailed disclaimer.

This Hotline provides general information existing at the time of preparation. The Hotline is intended as a news update and Nishith Desai Associates neither assumes nor accepts any responsibility for any loss arising to any person acting or refraining from acting as a result of any material contained in this Hotline. It is recommended that professional advice be taken based on the specific facts and circumstances. This Hotline does not substitute the need to refer to the original pronouncements.

This is not a Spam mail. You have received this mail because you have either requested for it or someone must have suggested your name. Since India has no anti-spamming law, we refer to the US directive, which states that a mail cannot be considered Spam if it contains the sender's contact information, which this mail does. In case this mail doesn't concern you, please unsubscribe from mailing list.

## Research Papers

### Life Sciences 2025

June 11, 2025

### The Tour d'Horizon of Data Law Implications of Digital Twins

May 29, 2025

### Global Capability Centers

May 27, 2025

## Research Articles

### 2025 Watchlist: Life Sciences Sector India

April 04, 2025

### Re-Evaluating Press Note 3 Of 2020: Should India's Land Borders Still Define Foreign Investment Boundaries?

February 04, 2025

### INDIA 2025: The Emerging Powerhouse for Private Equity and M&A Deals

January 15, 2025

## Audio

### CCI's Deal Value Test

February 22, 2025

### Securities Market Regulator's Continued Quest Against "Unfiltered" Financial Advice

December 18, 2024

### Digital Lending - Part 1 - What's New with NBFC P2Ps

November 19, 2024

## NDA Connect

Connect with us at events, conferences and seminars.

## NDA Hotline

Click here to view Hotline archives.

## Video

### Vyapak Desai speaking on the danger of deepfakes | Legally Speaking with Tarun Nangia | NewsX

April 01, 2025

**SIAC 2025 Rules: Key changes &  
Implications**

February 18, 2025