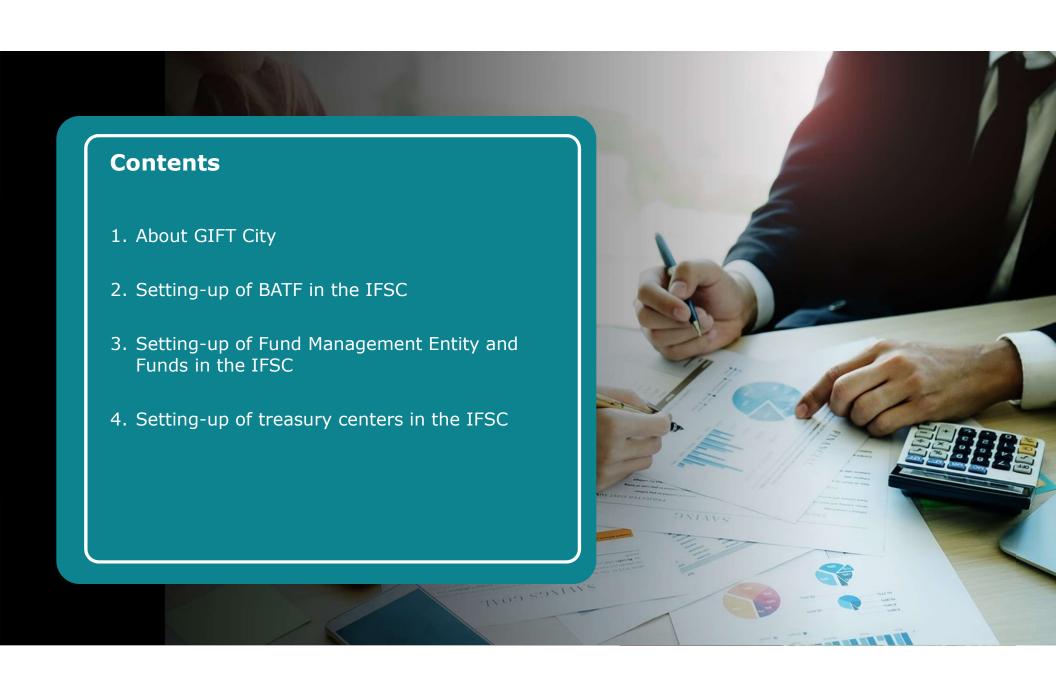
India's International Financial Services Centre

(Gujarat International Finance Tec-City)







Overview of International Financial Service Centre (IFSC)

Under the Indian context "it is a jurisdiction that provides financial services to non-residents and residents (Institutions), in foreign currency other than Indian Rupee (INR)"



Set-up to undertake financial services transactions that are currently carried on outside India by overseas financial institutions and overseas branches/ subsidiaries of Indian financial institutions



Caters to the customers outside the jurisdiction of domestic economy. Such centers deal with the flow of finance, financial products, and services across the borders



In India, an IFSC is approved and regulated by the Government of India under the Special Economic Zones Act, 2005

Gujarat International Finance Tec-City ('GIFT') - India's first IFSC, planned on 886 acres of land with 62 mn sq. ft. of Built-up Area

The Government of Gujarat with a vision to catalyze India's Financial Service Offering by leveraging Gujarat's value proposition, has developed GIFT Project



Vision

• To tie-up with technology, to create a hub complete with Infrastructure, to meet the needs of modern Gujarat, modern India and to create a space in the global financial world



Mission

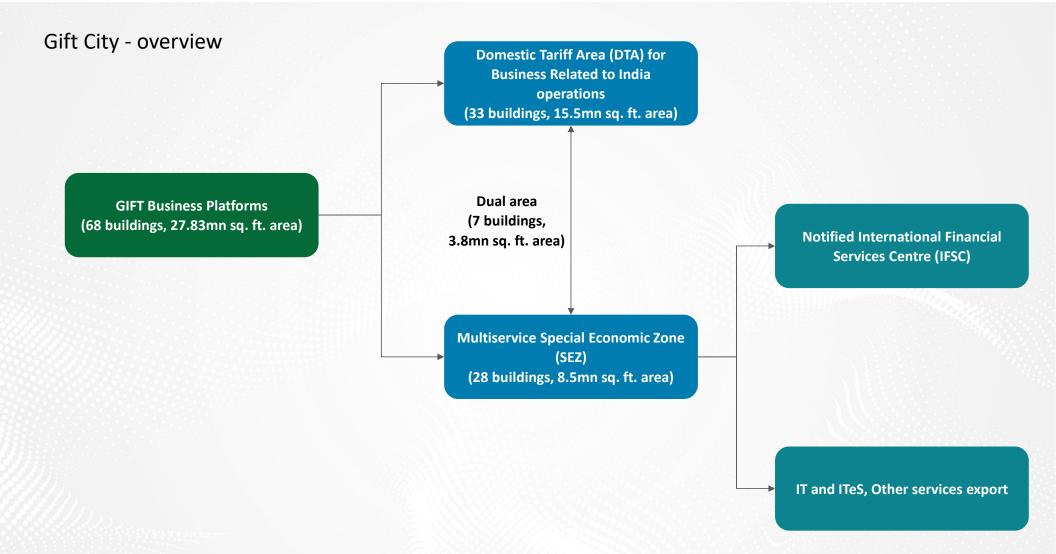
- Provide International Banking Services in India and State of the art Infrastructure with excellent external connectivity, at or above par with globally benchmarked business districts
- Create Large employment in the field of services industry in Gujarat



Objectives

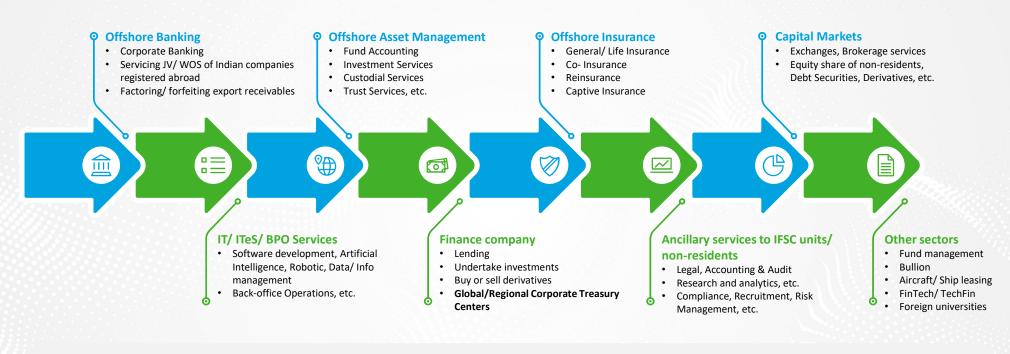
To Create:

- A Global Financial and IT Hub: with a Domestic Tariff Area & Multi Services Special Economic Zone (SEZ)
- To be at or above par with globally benchmarked business districts
- Employment opportunities for 1million people
- A Vertical City: 1st of its kind in the country in scale, scope and quality



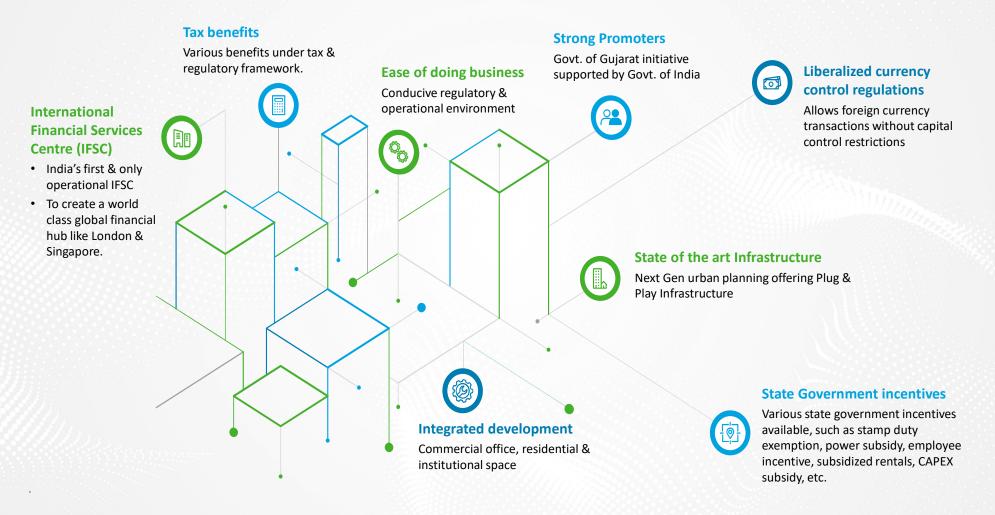
What services can an entity provide in IFSC - GIFT?

IFSC is envisaged as a jurisdiction that provides the following financial services to non-residents and residents, to the extent permissible under the current regulations, in any foreign currency



- The International Financial Services Centres Authority ('IFSCA') was established on 27 April 2020 under the International Financial Services Centres Authority Act, 2019 ('IFSCA Act') to be a Unified authority for the Development and Regulation of financial products, financial services and financial institutions in IFSC
- Singapore International Arbitration Centre ('SIAC') to provide a neutral and independent dispute resolution platform to parties, thereby enabling them to undertake large international financial transactions from GIFT IFSC

Why set-up your business in IFSC - GIFT City?



Tax & Regulatory incentives for units in IFSC

Dividend income distributed by Company in IFSC to be taxed in the hands of the shareholder at lower rate of 10% (if shareholder is outside India) as per section 115A of the Act

Interest payable by IFSC unit to a nonresident is not taxable as per section 10(15)(ix) of the Act

Exemption provided from thin capitalization rules for Finance Companies set-up in the IFSC Various State
Government incentives
on stamp duty,
registration fee,
electricity duty, lease
rental, specified CAPEX
and OPEX and
employment generation

















As per section 80LA of the Act, 100% tax deduction available for 10 consecutive years out of first 15 years of operations As per section 115JB of the Act, MAT / AMT @ 9% of book profits applies to Company / LLP as a unit in IFSC. MAT not applicable to companies in IFSC opting for new tax regime under section 115BAA of the Act

No tax on transfer of specified capital assets sold on IFSC exchanges as per section 47(viiab) of the Act

No GST on services -

- Received by unit in IFSC
- Provided to IFSC / SEZ units or Offshore clients

GST applicable on services provided to DTA

State Government incentives for units in IFSC



100% reimbursement of stamp duty and registration fee paid.



100% reimbursement of electricity duty and Re.1 subsidy on power tariff for a period of 5 years.



One Time Employment Generation Incentive upto 50% of 1 month CTC capped at INR 60,000/- and 50,000/for every new female and male employee respectively.

Additionally, reimbursement of employer's contribution to EPF upto 100% and 75% amount paid for female and male employees respectively for a period of 5 years.



Lease Rental subsidy for every 50 sq ft per employee: upto 20 employees: Rs.8 per sq ft 20 - 100 employees: Rs.5 per sq ft above 100 employees: Rs.3 per sq ft



CAPEX subsidy @25% of capital expenditure for one time purchase of computers, networking and related hardware, subject to a ceiling of INR 50 Cr. and INR 200 Cr. respectively for CAT-1 and Mega projects.

Additionally, OPEX support for 5 years which is upto 15% of eligible OPEX capped at INR 20Cr and 40 Cr for Cat-1 and Mega projects respectively.

IFSC: Business activities

Banking

- Banks (36)
- Global Administrative Office (2)

Insurance

- Indian & Foreign Insurer/ reinsurer (20)
- Insurance Intermediaries (25)
- Insurance Web-Aggregators

Capital Markets

- Stock Exchanges (3)
- Clearing Corporation (2)
- Broker Dealers (89)
- Investment Bankers (4)
- Custodians (5)
- Depository Participants (10)
- Clearing members (23)

Niche Institutions

- International Bullion Exchange
- Finance Companies (10)
- Global Treasury Centre (4)
- ITFS Platform (4)
- Aircraft Leasing & Financing (31)
- Ship Leasing & Financing (24)

Asset Management

- Fund Management Entities (167)
- Alternate Investment Funds (255)
- Investment Advisers (4)
- Portfolio Managers (19)

Practising CA's

- BATF Accounting services (17)
- BATF Book-keeping (17)
- BATF Financial Crime Compliance (6)
- BATF Taxation (16)

^{*}Figures in brackets are the number of entities authorized by IFSCA

IFSC: Key existing market players

Banks



JPMorganChase 🟮













Finance companies



VISTA/JET











Fund Management Entities

















Brokers













Insurance/ Reinsurance















Ancillary Service Providers















Regulatory considerations applicable for setting-up entities in the IFSC

OPI in IFSC Funds

• Unlisted Indian entities are allowed to make Overseas Portfolio Investments (OPI) in funds or vehicles based in IFSC

ODI permissible

• Indian investors permitted to make ODI in IFSC entities, upto 400% of the net worth

ODI Without Profit
Norms

• Indian entities not engaged in financial services can make ODI in IFSC entities without needing to meet profitability conditions

ODI by Individuals

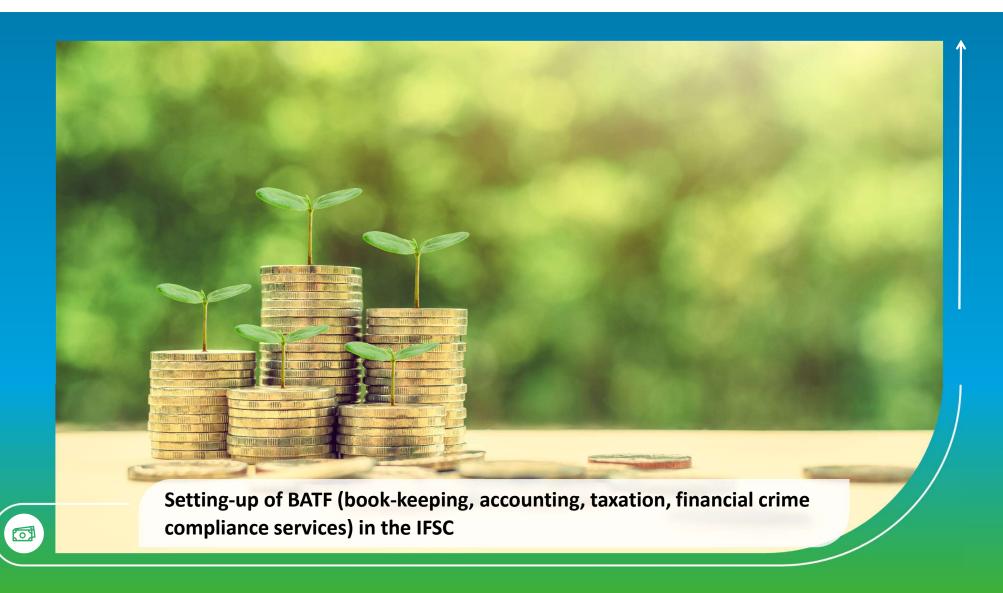
• Resident individuals can make ODI as well as OPI in IFSC entities

Deemed Approval Rule

• If a regulator (like SEBI or IFSCA) doesn't respond within 45 days to an ODI application, approval is deemed to have been granted

Mandatory Reporting

• All IFSC investments must be reported through Authorized Dealer (AD) banks, and delays may lead to penalties



BATF Regulations in IFSC

What are the incentives?

- 10 year income tax holiday out of first 15 years
- Gujarat State Govt incentives

Who can set-up?

Any Indian or foreign entity can setup entity in IFSC to provide following services:

- (i) book-keeping;
- (ii) accounting;
- (iii) taxation;
- (iv) financial crime compliance services.

Relocation of employees from an existing entity in the domestic area in India permissible only for supervisory personnel, subject to prior approval of IFSCA, up to 20% of the strength

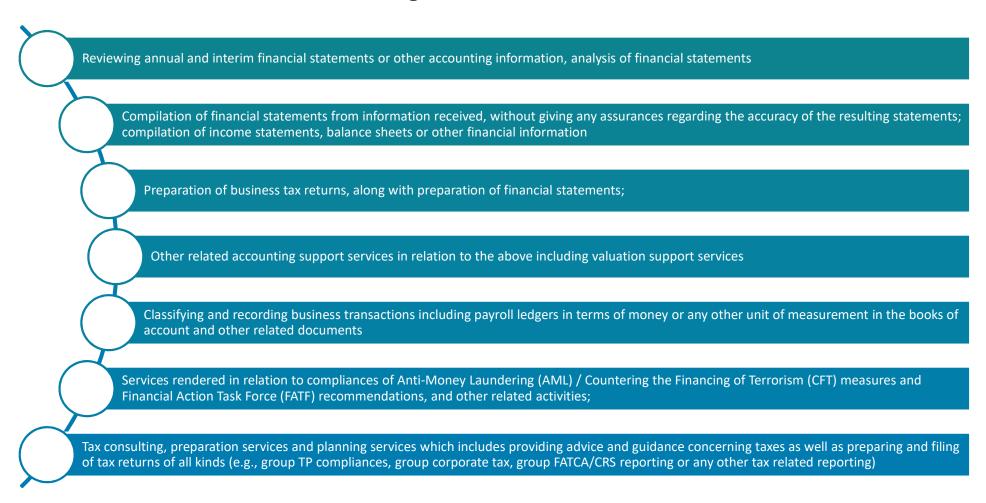
Service Recipient

Service recipient must be non-resident – need not be in the FS sector

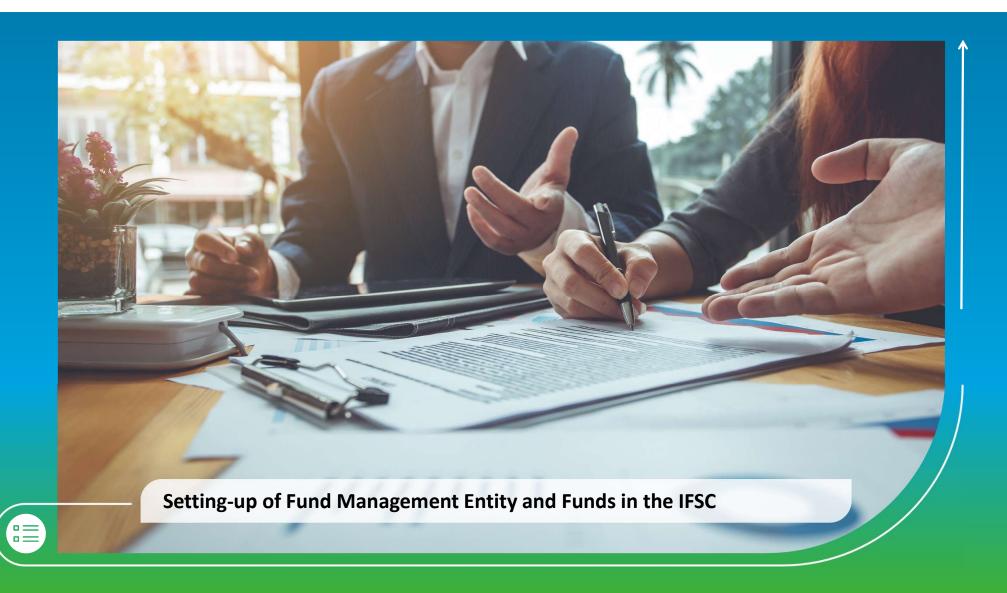
Any specific restriction

- None, anyone intending to set-up a BATF can set-up a presence in the IFSC
- Only permissible activities can be undertaken

Permissible activities under BATF Regulations



15



Background of the IFSCA (Fund Management) Regulations, 2025

- International Financial Services Centres Authority (IFSCA) is endeavoring to develop a comprehensive regulatory framework for Investment Funds based on global best practices, with a special focus on ease of doing business
- IFSCA had notified the IFSCA (Fund Management) Regulations, 2022 ("FM Regulations"), effective from 19 May 2022
- Subsequently, the IFSCA has unveiled the IFSCA (Fund Management) Regulations, 2025 ('FM Regulations'), replacing the 2022 version, to streamline business operations, lower compliance costs, and offer greater regulatory clarity to the FME and Funds set-up within the IFSC

Regulating Fund Manager instead of Fund

• In line with global practices, IFSCA intends to regulate the Fund Managers as against exercising regulatory oversight over the Funds

Single registration for multiple activities

• A Fund Manager can undertake host of activities related to fund management viz. manage retail schemes, non-retail schemes, undertake portfolio management services or operate as a manager to various investment trusts by seeking a single unified registration from IFSCA

Risk Based approach based on activity to be undertaken

- Fund Management Entity ("FME") can be registered under three categories, depending upon the activity proposed to be undertaken
- Higher regulatory oversight for Fund Management Entity managing Retail Funds as compared to Fund Management Entity managing non-retail Funds or Venture Capital Funds

Regulatory aspects for FME for managing Non-Retail Fund (i.e. AIF)

Particulars	Registered FME (for Non-retail Funds/ AIFs)
Permissible activities	 Managing Venture Capital and Restricted Schemes (i.e., AIFs) investing in securities, financial products and such other permitted asset classes Portfolio Management Services (including for multi-family office) Investment Manager of Investment Trust (REITs and InvITs) offered under private placement All activities as permitted to Authorised FMEs FMEs have been permitted to open branches or representative offices in other jurisdictions for the purpose of marketing their offerings and client service, after intimating to the IFSCA
Type of investors permissible	 Accredited investors Minimum investment of USD 150,000 (USD 40,000 for employees/ directors/ designated partners of FME) Upto 2 individuals, being investor and their spouse/ parent/ daughter/ son, can act as 'joint investors'
Launch of Scheme	Immediately upon filing the Private Placement Memorandum ("PPM") with the IFSCA
Legal Structure of the FME	Company, LLP, Branch
Minimum net worth	• USD 500,000
Minimum Experience of FME	 FME required to employ such employees who have relevant qualification and experience (please see subsequent slides) KMPs should satisfy 'fit and proper' condition as prescribed by the IFSCA
Investment in associates	Permissible, subject to prior approval of 75% investors in the scheme by value and other conditions
Changes to KMP	Required to be intimated to the IFSCA
Books of accounts by FME	Can be maintained under Indian GAAP or IND AS or IFRS or US GAAP or such other permitted accounting standard
Substance requirement in IFSC	 The proposal on the portfolio composition shall be initiated by a person who is based in office of the FME in the IFSC Should be meaningful mind in the form of senior management located and not local agent or low-level staff

Role of Key Managerial Personnels (KMPs) in the IFSC

Particulars	Registered FME (for Non-retail Funds/ AIFs)
Investment advisors in India and outside India	Permitted to obtain non-binding investment advisory from entities in India as well as outside India
Minimum number of Key Managerial Personnel ("KMP")	 2 (1 Principal Officer and 1 Compliance Officer) FMEs managing an AUM of at least USD 1bn (excluding FoFs AUM) must appoint an additional KMP within 6 months of the financial year-end
Role of Principal Officer	 Principal Officer is responsible for overall activities of the FME including but not limited to fund management, risk management and compliance
Role of Compliance Officer	 Compliance Officer is responsible for compliance with the IFSCA FM Regulations and to ensure suitable risk management policies and practices at the FME
Minimum Qualification of the Key Managerial Personnel	 Professional qualification or post-graduate degree or post graduate diploma (minimum one year in duration) in finance, law, accountancy, business management, commerce, economics, capital market, banking, insurance or actuarial science from a university or an institution recognised by the Central Government or any State Government or a recognised foreign university or institution or association or a CFA or a FRM from Global Association of Risk Professionals or any other relevant educational qualifications as may be specified by the IFSCA.
Minimum Experience of KMP	 At least 5 years in related activities in the securities market or financial products including in a portfolio manager, broker dealer, investment advisor, wealth manager, research analyst, credit rating, market infrastructure institution, financial sector regulator, fund management Consultancy experience n areas related to fund management, such as deal due diligence, transaction advisory, etc. upto 2 years also permitted Above experience requirement is reduced to 3 years for KMPs with relevant qualification and experience Additionally, certification required for all KMPs from such institutions, as may be specified

Setting-up of Non-Retail Fund (i.e. AIF)

Regulatory consideration (1/2)

Particulars	Restricted Scheme (Non-Retail) in IFSC (i.e., AIF)
Permissible investments	 Non-Retail Scheme in IFSC permitted to invest in: Listed and to be listed securities; Unlisted securities; Money market instruments; Debt securities; Securitised debt instruments; Other investment schemes; Any derivatives (including commodity derivatives); Units of Mutual Funds and AIFs (whether in India, IFSC or abroad); Limited Liability Partnerships; and Such other financial products/ assets as may be specified Investment should be in accordance with the investment objective of the scheme Close ended scheme may invest up to 20% of the corpus in other physical assets such as real estate, bullion, art or any other physical asset as may be specified
Investment pending deployment of money	 Certificate of deposits, bank deposits, overnight schemes, units of investment schemes such as liquid or money market schemes, money market instruments or any other securities or financial assets or instruments as may be specified by IFSCA
Investment in unlisted entities	 Open-ended schemes: Maximum 25% of the corpus Close-ended schemes: No restriction
Corpus of the Scheme	 Minimum: USD 3 million. Open-ended schemes can commence the investment activities upon achieving an investment of USD 1mn and the minimum corpus of USD 3mn shall be achieved within 12 months period Maximum: NA

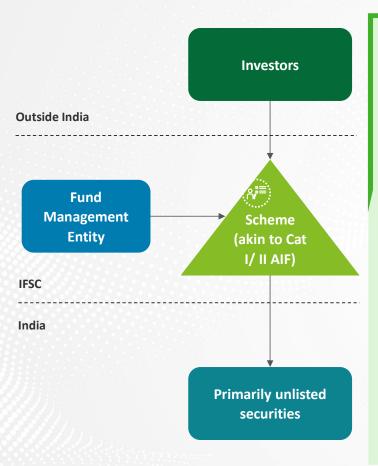
Setting-up of Non-Retail Fund (i.e. AIF)

Regulatory consideration (2/2)

Particulars	Restricted Scheme (Non-Retail) in IFSC (i.e., AIF)
Tenure	 Minimum 1 year for close ended scheme Extension upto 2 years permissible with 2/3rd investor's consent Extension beyond 2 years permitted subject to express consent of the willing investors and exit opportunity being made available to the dissenting Investors
Minimum contribution/ commitment from the investor	 Accredited investors - NIL Investors investing atleast USD 150,000 (USD 40,000 for employees/ directors/ designated partners of FME)
Independent custodian	Mandatory for open ended schemes or if AUM exceeds 70mn
Max number of investors in Scheme	• 1,000 investors
'Skin-in-the-game' contribution by FME***	 Open ended scheme: Minimum 5% or USD 1,500,000, whichever is lower, but not exceeding 10% Close ended scheme: Minimum 5% or USD 750,000, whichever is lower, but not exceeding 10% Time limit for contribution by FME – 45 days, which can be extended, subject to satisfaction of the IFSCA Upto 100% permitted if such FME or its associate as well as its ultimate beneficial owners are not a resident in India and not more than 1/3rd of its corpus is invested in an Investee Company and its associates
Disclosure of NAV	 Open ended scheme: Monthly Close ended scheme: Half yearly
Leverage	• Permissible, subject to disclosure in the PPM (amount as well as the methodology used for calculation) and any deviation requires consent of 2/3 rd investors by value
Co-investment	Permissible, subject to conditions
Valuation to be done by	Independent third-party service provider

^{***}Not mandatory in case of relocation of Funds/ Schemes and Fund of Funds investing in scheme with similar requirements. Also, not mandatory for Authorised FME and Registered FME (non-retail), if approval received from atleast 2/3rd investors or if atleast 2/3rd investors are accredited

Setting-up a Non-Retail Restricted Scheme (akin to Category I/ II AIF) in the IFSC



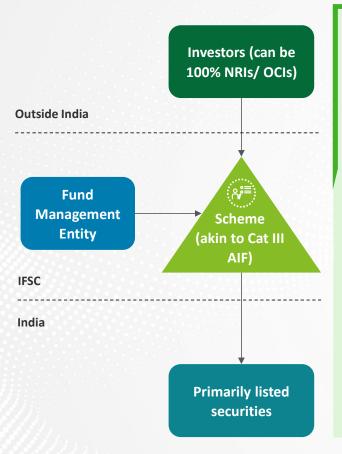
Taxation aspects for Funds and the investors

- Pass through available for all incomes earned by the AIF (except business income)
- Investors are taxed on income arising from investments made by the AIF as if the investments were made directly by them (similar to domestic tax regime)
- Income taxable directly in the hands of the investors
 - **Tax rates on securities:** Long-term capital gains 12.5%, Short term capital gains 20%/ 30%/ 35% (plus applicable surcharge and cess)
 - Dividend income: 20% (plus surcharge and cess)
 - Interest income: 30%/ 35% (plus surcharge and cess)
- No tax on income of FME for 10 out of first 15 years. No GST on management fees/performance fees
- · Foreign investors eligible to claim benefits under the tax treaty, subject to conditions
- Foreign investors exempt from obtaining PAN and filing Tax return in India, subject to suitable deduction of taxes at source and other conditions

Key regulatory considerations

- Minimum contribution from investors: Accredited investors and Investors investing at least USD 150,000 (USD 40,000 for employees/ directors/ designated partners of FME). No maximum investment limit
- Maximum number of investors: 1,000
- Leverage: Permissible without any limits, subject to suitable disclosure in the PPM. Any deviation requires prior investor approval
- Diversification conditions: Not applicable
- Please refer Annexure for detailed regulatory implications for Funds set-up in the IFSC

Setting-up a Non-Retail Restricted Scheme (akin to Category III AIF) in the IFSC



Taxation aspects for Fund and the investors

- Tax levied at Scheme level. Investment to be made under the FPI route
- Scheme liable to tax in India only on income earned from Indian securities. Exemption/lower rate of taxation available "to the extent attributable to non-resident investors":
 - Tax rates on listed equity shares: Long-term capital gains 12.5%, Short term capital gains 20%. To be increased by applicable surcharge and cess
 - Dividend and interest income: 10% (flat rate). Interest on bonds listed on IFSC exchange: 9%
 - No tax on gains arising from transfer of any other securities (debt, bonds, RETIs / INVITs, derivatives, Mutual Funds. Security Receipts, etc.)
 - No tax on specified securities traded on the IFSC stock exchanges
 - No tax on income from foreign securities
 - Income from a securitisation trust which is chargeable under the head "Profits and gains of business or profession"
- No tax on income of FME for 10 out of first 15 years
- No GST on management fees/ performance fees
- Foreign investors not taxable on income earned from the AIF or gains arising on transfer of units of AIF
- · Foreign investors exempt from obtaining PAN and filing tax return in India

100% NRI/ OCI investments permissible in the AIF with each NRI/ OCI investor investing less than 25% in the AIF. AIF to obtain requisite information from investors

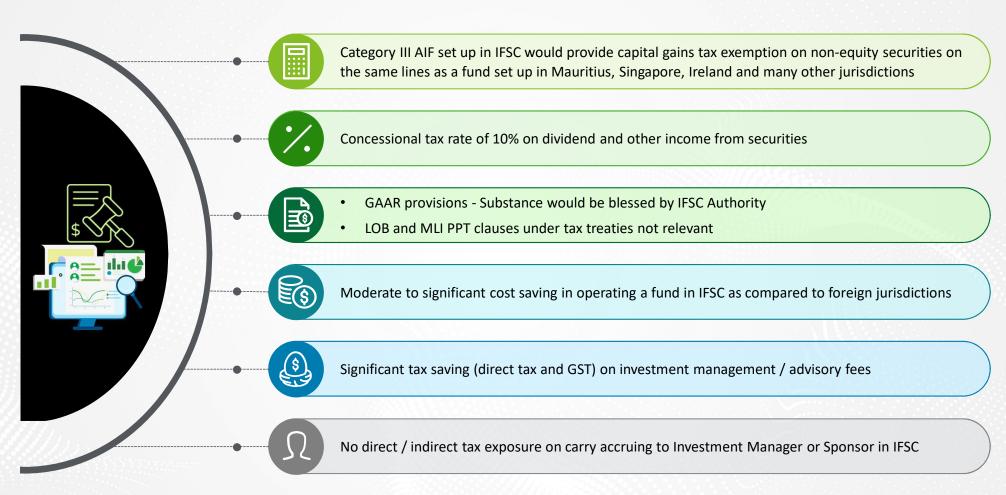
Taxation aspects relating to Fund Management Entity in the IFSC

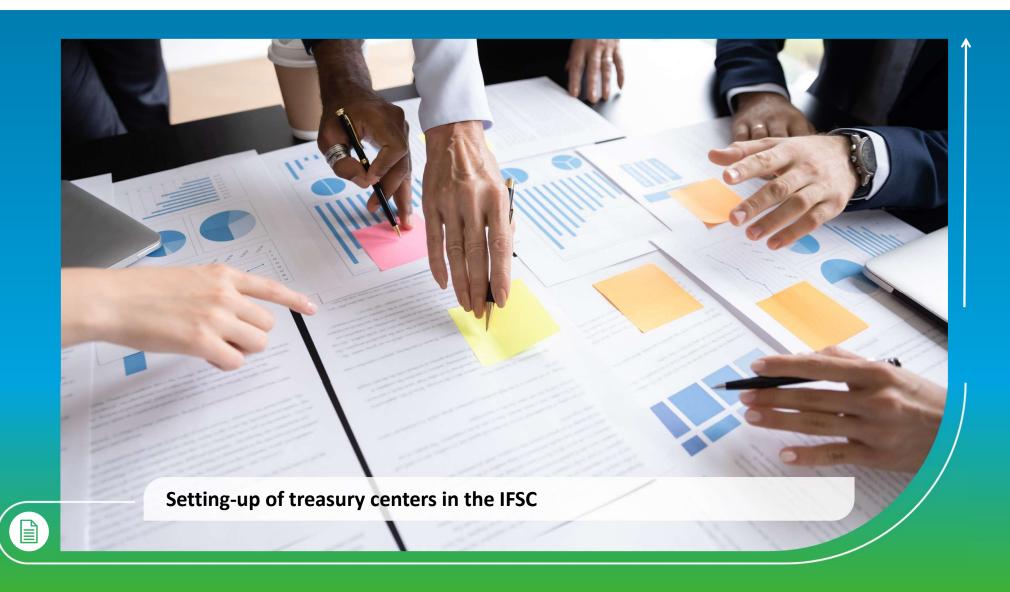
Particulars	Key considerations
Income tax	• 100% tax exemption on business income for 10 consecutive years out of first 15 years, at the option of the FME
	Concessional rate of MAT/ AMT of 9 percent (plus applicable surcharge and cess)
	• MAT not applicable if the FME set-up as a Company in IFSC opts for the concessional tax regime provided under section 115BAA i.e., opts for the tax rate of 22% (plus applicable surcharge and cess), subject to conditions.
	Once the concessional tax regime under section 115BAA is opted, it shall apply to all subsequent assessment years
	Amount of dividend distributed by a IFSC company to its holding company may be taxable in the hands of the holding company
	Benefits can be claimed under section 80M by a domestic holding company and benefits of DTAA can be claimed by foreign investors
	Interest income earned by non-residents on lending monies to IFSC units not taxable
Indirect taxes	No GST rate on procurement of goods and services from within India
	Custom duty exemption on import of goods from outside India
	GST exemption on procurement of services from outside India, for authorized operations
	Supply of services to foreign customers without payment of GST
	SEZ can supply goods and services within India within permissible limits
Tax on distribution by FME to its shareholders	Amount of dividend distributed by a FME in the IFSC to its holding company taxable in the hands of the holding company
	The FME in IFSC to deduct taxes at source (TDS) at the rate of 10% (plus applicable surcharge and cess)
	Benefits can be claimed under section 80M by a domestic holding company
	Benefits of DTAA can be claimed by foreign investors in the FME in IFSC, if any
	No tax on distribution in case the FME is set-up as an LLP

Procedure for setting up of Fund Management Entity and Fund in IFSC

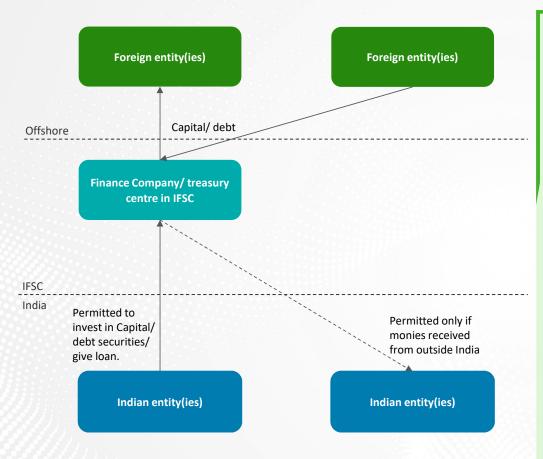
- 1 Identification of office space in GIFT City for Fund Management Entity (FME) and the Fund
- 2 Setting-up the Fund Management entity (company, LLP or a branch of domestic AIF Manager entity) and the Fund (Trust, Partnership, Company)
- 3 Application for Permanent Account Number for FME and the Fund
- 4 Application to Administrator (IFSCA) to obtain SEZ approval for FME and Fund, and obtain letter of approval
- Finalization of Fund documents required as part of application for FME and Fund license such as Private Placement Memorandum (capturing commercials of Fund),
 Application Form and relevant documents, i.e., Investment Management Agreement, Contribution Agreement
- 5B Application to IFSCA for obtaining registration as a FME and filing of PPM of the Fund
- 6 Application for FPI license for the Fund (in case investment is proposed in listed Indian securities)
- 7 In case of relocation, existing FPI to approach local custodian for one-time 'off-market' transfer of its securities to the resultant Fund
- In case of relocation, once the securities are transferred from offshore fund to IFSC fund, surrender of FPI license, winding up of the fund in offshore jurisdiction and intimation of winding up to Indian tax authorities

IFSC v. popular offshore fund jurisdictions





Setting-up of entity in GIFT IFSC for undertaking treasury operations



Structure/Modalities and key considerations:

- Entity in GIFT City (IFSC) allowed to carry out treasury activities including cross border borrowing/ lending, subject to approval of IFSC authority and fulfilment of other regulatory requirements/conditions;
- Treasury activity: regular/ongoing activity requiring presence of employees (commensurate with level of activities) in GIFT City (shell structure prohibited);
- Transactions in freely convertible foreign currency only (dollar, euro, etc.)
 [INR denominated bank account for administrative and statutory expenses];
- Minimum net worth of USD 0.2mn or as may be prescribed at the time of approval.
- Income tax exemption of 100% for 10 consecutive years out of first 15 years; Income tax (for other years) @ 25% (approx.);
- Dividend income taxable @ 10% (plus applicable surcharge/cess) for non-resident shareholders;
- Interest (on loans paid by unit in GIFT City) is exempt in the hands of nonresidents.

Who should set-up?

- Indian and foreign MNCs can set-up treasury center in GIFT City
- "Cash rich" Indian entities (including captive back office operations entity)
 of overseas group companies, intending to utilize surplus cash in tax
 efficient way
- Cost plus entities in India, as a cash utilization strategy
- Offshore/ Indian entities engaged in cross border borrowing/ lending

Incorporation of unit in GIFT City: Either by Indian company or foreign company or a joint venture of both (any permutation/combination will work)

Permissible Activities | GRCTC for Group entities, Parent's Group Entities, and their branches

Activities that may be undertaken by Global/Regional Corporate Treasury Centers for its Group entities, Parent's Group Entities, and their branches

Raising of capital/lending

- Raising capital by issuance of equity shares
- Borrowing including in the form of inter-company deposits
- Credit arrangements, which includes the activities of lending (by whatever name called), providing credit guarantee, performance bonds and any other credit facility

Investing activities

- Investing in financial instruments issued in IFSC or outside IFSC
- Acting as a holding company
- Undertaking permitted derivative transactions [Over the counter (OTC) and Exchange traded]
- Undertaking OTC derivative transactions not permitted in IFSC with counterparties outside IFSC
- Trading in exchange traded derivatives in IFSC or outside IFSC
- Hedging its own books or books of service recipients permitted

Liquidity Management

- · Pooling of funds
- Optimising cash flows, interest payments, working capital and tax payments through netting and cash concentration
- Confirmation and reconciliation of receipts
- Processing payments to the vendors or suppliers of the service recipients and negotiating payment terms with supplier
- Consolidating and managing payment to suppliers across the group
- Managing liquidity of group and investment of surplus funds
- Undertaking foreign exchange transactions in permitted currencies
- Conceptualisation, development and negotiation of pooling mechanisms

Maintaining relationships with financial counterparties

- Providing performance and risk analytics
- Managing relationship with banks, credit rating agencies or other financial counterparties
- Undertaking valuation of financial instruments
- Undertaking the accounting of treasury transactions
- Implementing and managing treasury and financial risk policies and procedures
- Undertaking covenant tests and providing the result of such test to investors and lenders
- Providing compliance information to regulators
- · Maintaining transaction history and audit trail
- Liaising with internal and external auditors

Management of obligations of its service recipients towards insurance and pension related commitments

- Negotiating, managing and monitoring pension/insurance structures;
- Managing relationships with internal and external pension/insurance providers;
- · Pension Planning.

Working Capital management

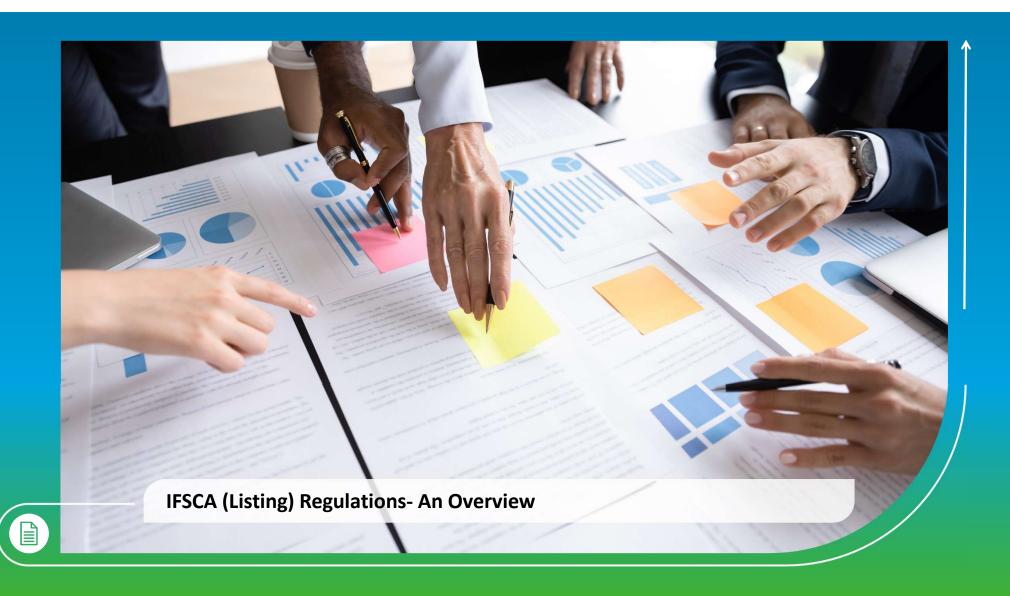
- Factoring and Forfaiting, by seeking registration as a Factor under the IFSCA (Registration of Factors and Registration of Assignment of Receivables) Regulations, 2024
- Acting as Re-invoicing centre, provided that the GRCTC does not take physical possession of such goods and one of the parties to each re-invoicing transaction is a service recipient

Advisory service related to financial management, including financial risk management

- Providing advice relating to Financial management activities, including Cash flow forecasting, Financial management of group entities, Investment appraisal, Tax planning, and Operational risk management
- Providing advice relating to Financial risk management activities, including Identifying natural hedges and offsets within group entities, Interest Rate risk management, Risk management relating to Foreign Exchange, Commodities, Counterparties, Credit and Liquidity, De-risking contracts and avoiding bad debts, Advising on hedging strategies, and Monitoring financial risk positions

Advisory service related to funding and capital market activities

- · Optimisation of capital structure;
- Managing short, medium and long-term investments in different asset classes and special purpose vehicles (SPVs)
- Ensuring adequate liquidity to support the business operations
- Ensuring market competitiveness for global market operations
- · Diversifying sources of capital, partners and maturities
- Monitoring and managing credit ratings
- Portfolio management of debt, derivatives and investments
- Negotiating, executing and managing funding from sale of receivables or payable solution with external parties



Applicability – What can be listed

Initial public offer by Unlisted Company

Follow-on public offer by Listed Company

Initial public offer by Special Purpose Acquisition Company

Rights issue or preferential issue by Listed Company

Qualified Institutions

placement by Listed Company

Issuance and Listing of depository receipts by Company

6

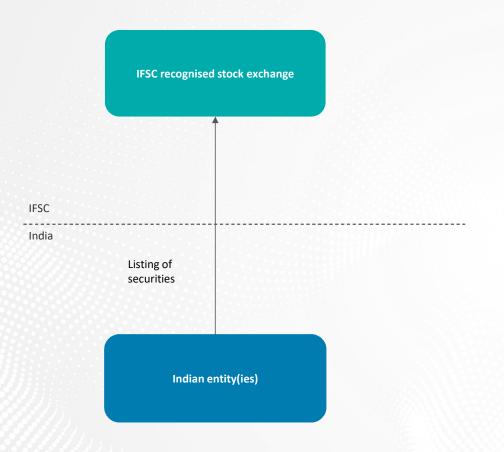
Issue and Listing of debt securities of Company

Secondary Listing of securities

9

Listing of Commercial paper and Certificates of deposit

Setting-up of entity in GIFT IFSC for undertaking treasury operations



Key tax Considerations

- Investments in specified securities* listed on the GIFT IFSC stock exchange is exempt from capital gains tax for non-residents
- Interest income on bonds listed on recognised stock exchanges in GIFT IFSC taxable at 9% (plus surcharge and cess)
- No STT, CTT, Stamp duty and GST on transactions carried out on GIFT IFSC exchanges

*Note - Specified securities includes Global Depository Receipt, Foreign Currency Denominated Bonds, Rupee Denominated Bonds of an Indian company, Derivatives, Units of a Mutual Fund, Units of a Business Trust or Units of an AIF and Foreign Currency denominated Equity Shares.

Bonds listed on India INX



THANK YOU

Contact me - Vijay Morarka



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Sells LLP

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Vijay is based out of Mumbai and has over 12 years of experience in corporate and international tax.

Vijay specializes in advising clients in the financial services sector, with primary focus on the asset management industry. He has experience in advising foreign portfolio investors, private equity clients, alternative investment funds in evaluating market entry options, setting-up, domestic and international tax matters, exchange control norms, capital market regulations, etc.

Vijay has also helped various funds in setting-up presence in the International Financial Services Centre, including setting-up of the first ever operational AIF set-up in the IFSC.

Vijay has actively participated in drafting of the IFSCA (Fund Management) Regulations and regulatory framework pertaining to the Variable Capital Company Structure in IFSC.

He has also been awarded the prestigious '40 under 40' by Equalifi (erstwhile AIWMI)

Vijay has been an associate of Institute of Chartered Accountants of India since 2012 and has also completed Bachelors in Commerce.