

Our Experience

JMP Advisors offers advice in international taxation, domestic taxation, transfer pricing, mergers and acquisitions, Goods and Services Tax ("GST"), business laws and exchange control regulations and foreign investment consulting. We specialize in fiscal strategy and policy foresight and are trusted advisors to high networth families.

We are listing below the brief details of a few of our assignments for illustrative purposes. For complete details of the areas in which we provide services, please refer to our credentials.

International tax

1. Advised a global reinsurance major in connection with the Mutual Agreement Procedure (MAP) application filed on Indian income tax and transfer pricing issues, including discussions with the Indian Competent Authority from time to time.
2. Advised in connection with the review of ESOP schemes (including global employees' stock purchase plans by the U.S listed parent), pricing basis of stock options and Indian tax, regulatory and accounting implications for various companies including a multinational bank, an Indian subsidiary of a NYSE listed multinational company engaged in engineering consulting and design services and a start up company in the business intelligence, analytics and software service sector.
3. Advised a start up company running an e-business platform for construction related products and materials on the income tax (including transfer pricing) implications on recharge of payments relating to IP development to offshore group companies and tax and regulatory implications on various alternative routes for exit from business.
4. Advised a leading African underground construction and shaft sinking company on various tax positions and exchange control issues from time to time, including review of past income tax returns with a view to obtaining a refund of excess taxes withheld.
5. Assisted a large Korean group interested in investing in the infrastructure sector in India in structuring its investments in India, including tax advice relating to Alternative Investment Funds.

Transfer Pricing

6. Carried out a comparative study of Safe Harbour Rules and the APA regime as a precursor to the preparation of a feasibility report for the APA route with a special focus on transfer pricing, in the case of a major multinational bank.

7. Prepared Transfer Pricing report, accountant's certificate in Form 3CEB and providing assessment services for one of the leading Indian multinational groups engaged in prospecting of minerals and exploration of oil and gas.

Corporate restructuring

8. Advised a large Indian power and infrastructure company on various alternatives to hive-off its undertakings, keeping in mind the objective of continuity of tax holiday enjoyed by the said undertaking and on eliminating options that could involve a perception of round tripping.
9. Conceptualized and evaluated various restructuring options from a tax and regulatory perspective for the demerger of licenses held by the client, particularly keeping in mind the restrictive conditions subject to which the licenses have been granted by the Ministry of Information and Broadcasting, as well as implementation of the restructuring options, including liaising with lawyers and drafting and filing of necessary documents with the Courts.
10. Advised a listed company engaged in textiles and real estate development activities with respect to corporate restructuring as well as family wealth restructuring which included demerging the assets of the listed company.
11. Assisted a mid-sized software development company in carrying out vendor due diligence in order to assist the company to be in a state of readiness for transfer of the company's business.
12. Assisted a medium sized private company providing IT services, edu tech, energy management etc. in the conceptualisation of a tax efficient corporate structure for outbound investment from India through Singapore from an Indian tax and regulatory perspective.
13. Ideated various restructuring alternatives to unlock the value of assets of the wholly owned subsidiary of a leading player in the telecom sector in India.

Corporate tax

14. Assisted a large Indian multinational engaged in the energy business to explore various alternatives to legally reduce its effective tax rate by a significant margin.
15. Assisted a leading listed infrastructure finance company in India in tax compliance relating to managing one of their large funds.
16. Undertook an analysis of the impact of Income Computation and Disclosure Standards ('ICDS') for a various multinational companies, including listed companies.

17. Advised a leading player in the telecom sector in India on the salary structure and various components of salary and perquisites from an income tax perspective, provided comments on tax efficiency of the structure and various components and advised on the best practices being followed in industry for salary structure consistent with income tax provisions.

High net worth individuals

18. Assisted a company promoted by the former global CEO of one of the largest consulting companies in the world in structuring one of its assignments with a leading company in India from a tax and regulatory perspective.
19. Assisting the India CEO of a large multinational bank in connection with India tax returns involving various issues relating to house property, taxability of foreign stock options and providing advice on the income tax and exchange control implications of holding various foreign assets and foreign income.
20. Assisting the Asia Pacific CEO of a global advertising and marketing agency in connection with India tax returns including advice on expatriate taxation issues.

Exchange control regulations

21. Advised a leading manufacturer of vinyl fabrics in North America on investment in a brownfield project in India from a strategic, commercial, tax and regulatory perspective (including FEMA, SEBI, FDI policy), on alternate tax efficient structures, negotiation strategies and valuation.
22. Advised a leading multinational company in the financial services sector on various income tax and exchange control implications arising in connection with foreign assets.
23. Conceptualized and evaluated various corporate structures (both outbound and inbound) from an Indian tax and regulatory perspective for investment by private equity funds in a greenfield project in pharma generics business in India and advised on incentives available under the domestic tax law for R&D facility set up in India.

Goods and Services Tax ("GST")

24. Study of Goods and Services Tax ("GST") impact on the existing business model and assistance in devising the GST implementation plan.
25. Evaluation of proposal for merger of entities under the current regime vis-à-vis proposed GST regime.