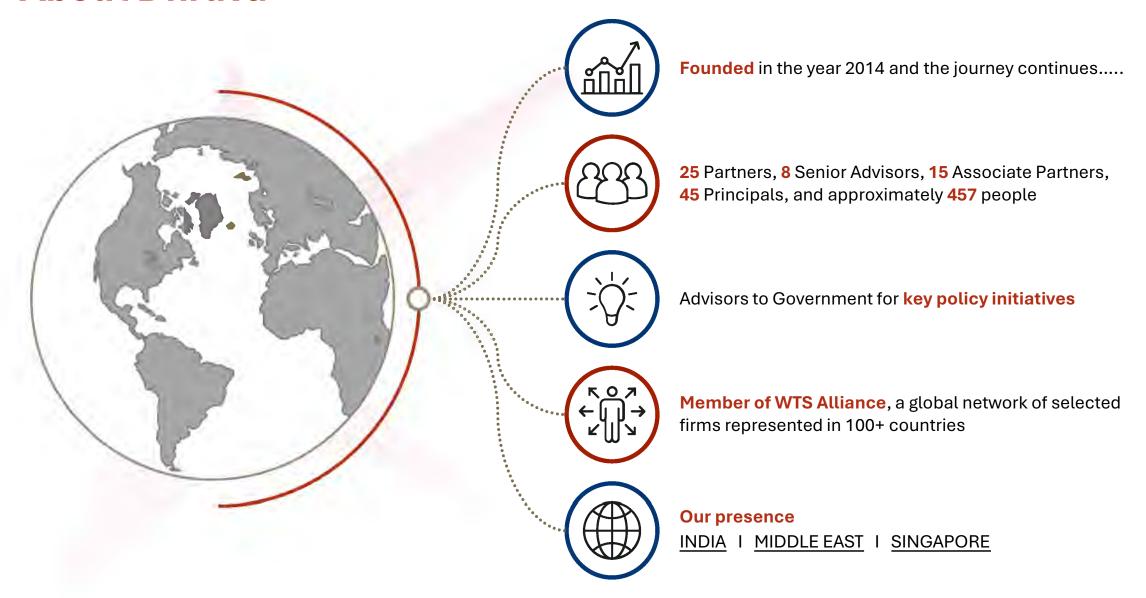


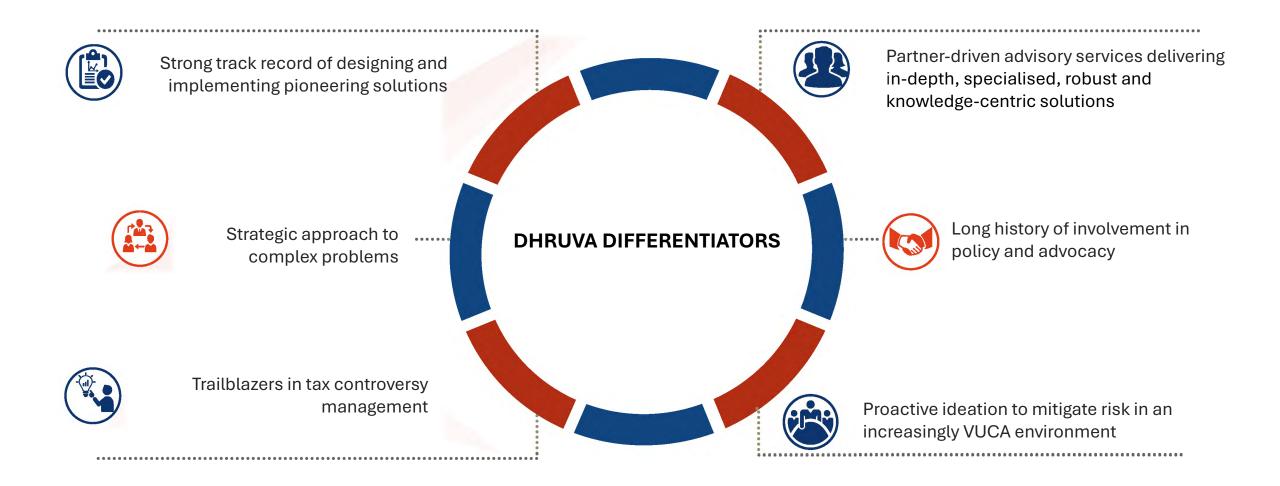


### **About Dhruva**





### **About Dhruva**





### **Awards**

India Tax Firm of the Year 2017, 2018, 2019, 2020 & 2021

Dhruva Advisors has been consistently recognised as the "India Tax Firm of the Year" at the ITR Asia Tax Awards in 2017, 2018, 2019, 2020 & 2021



Dhruva Advisors has also been recognised as the "India Disputes and Litigation Firm of the Year" at the ITR Asia Tax Awards 2018 & 2020



WTS Dhruva Consultants has been recognised as the "Best Newcomer Firm of the Year" at the ITR

European Tax Awards 2020



Dhruva Advisors has been recognised as the "Best Newcomer Firm of the Year" at the ITR Asia Tax Awards 2016



### Recognitions



Dhruva Advisors has been consistently recognised as a Tier 1 Firm in India for General Corporate Tax ranking tables as a part of ITR's World Tax guide.



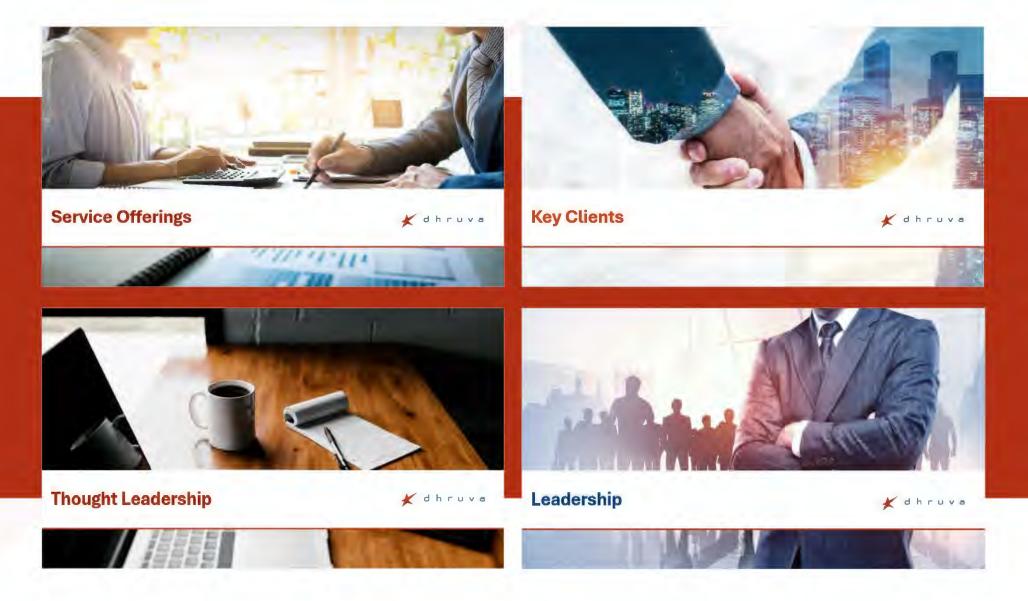
Dhruva Advisors has also been consistently recognised as a Tier 1 Firm in India for its Transfer Pricing practice ranking table in ITR's World Transfer Pricing guide



Dhruva Advisors has been consistently recognised as a Tier 1 Firm in India for Indirect Taxes ranking tables as a part of ITR's World Tax guide



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# **Service Offerings**



# **Service Offerings Overview**

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TAX CONTROVERSY MANAGEMENT

**CUSTOMS AND TRADE** 

**POLICY ADVOCACY** 

**UAE CORPORATE TAX** 

REGULATORY ADVISORY

TRANSFER PRICING

GOODS & SERVICES TAX (GST)

PRODUCT & EXPORT CONTROL REGULATIONS

**M&A TAX** 

FS, FUNDS & FPI TAX
ADVISORY &
COMPLIANCE

**LITIGATION SUPPORT** 

**SINGAPORE ADVISORY** 

TAX COMPLIANCE

FAMILY OFFICE ADVISORY

FOREIGN TRADE POLICY

SINGAPORE SET-UP, COMPLIANCE AND SUPPORT SERVICES DISPUTE RESOLUTION SERVICES

SUCCESSION PLANNING & ADVISORY

**INCENTIVES** 

**MIDDLE EAST VAT** 

ITR



# Service Offerings Overview – India

#### **CORPORATE TAX ADVISORY**

- Strategic tax solutions for all aspects of business activity, including entry strategy, holding company analysis, capitalisation, supply chain issues, IPR planning, tax incentives, cash repatriation, and structuring of sales and/or exits
- Tax advisory services for inbound and outbound investment structures, including structuring, planning, and risk management

#### **REGULATORY ADVISORY**

- Advising on the Indian regulatory framework in relation to business models being followed, transactions, investments, remittances, etc
- We can also provide assistance on the setting up of business, obtaining approvals from various regulatory authorities (including RBI, SEBI, DIPP, and SEZs), and provide solutions to complex regulatory issues

#### **M&A TAX**

- Advising on all aspects of M&A and implementation of restructuring, including acquisitions, mergers, demergers, restructuring of family holdings, joint ventures, and other group restructurings
- Promoter restructuring and succession planning
- Tax due diligence, post-deal integration and compliance support

#### TAX COMPLIANCE

- Assistance in preparation and filing of corporate tax returns, including advising on the maintenance of appropriate documentation relevant from a tax audit and/or assessment perspective
- Providing support for corporate tax litigation and advance rulings, including representation services before the tax authorities, and undertaking other compliances such as tax registrations, NIL, and/or lower withholding tax certificates from tax authorities, certification, etc.



# Service Offerings Overview – India

## DISPUTE RESOLUTION SERVICES

- In today's complex dispute landscape, we go beyond traditional litigation and closely collaborate with legal experts and other professionals, when required
- We resolve conflicts whether within families, joint venture partners, or shareholders while minimizing business disruption, leveraging analytics with expertise across financial, tax, regulatory, and commercial areas

## TAX CONTROVERSY MANAGEMENT

- Tax Controversy Management, includes strategic support and representation in tax and transfer pricing litigation before tax and appellate authorities
- Alternative dispute resolution mechanisms, including Mutual Agreement Procedure (MAP), arbitration under Bilateral Investment Treaties, and tax advocacy and/or representations before the Government on policy issues

# FS, FUNDS & FPI TAX ADVISORY & COMPLIANCE

- We offer a wide range of tax advisory, and compliance (including litigation support) services related to Financial Services entities, Funds and Foreign Portfolio Investors
- This includes assistance in structuring investments for Funds and FPIs in India and advising on optimal structures for Financial Services entities, along with outbound investments and advice on GIFT City structures

#### **FAMILY OFFICES**

- We offer a wide range of tax and regulatory services in relation to our Family Office practice, including advising on the appropriate family office structure and interaction with other advisors (such as AD Bankers, legal advisors, valuers, overseas advisors)
- Implementation assistance in relation to the structure (including entity set-up, regulatory approvals, finalization of relevant documents), ongoing review of the structure, and assistance with on-going tax compliances and litigation





### Service Offerings Overview – India

### SUCCESSION PLANNING & ADVISORY

- We offer a wide range of tax and regulatory services in relation to our Succession Planning and Promoter Advisory practice, that includes reviewing investment holding structures and advising on sale of assets and shareholdings in companies
- Residency planning from a tax and FEMA perspective, advisory on repatriation of capital under various available routes (such as LRS, NRO/NRE, OPI, ODI), creation of onshore and offshore family trust structures, approvals from regulatory authorities (such as RBI, SEBI, NCLT), and drafting of trust deeds, wills, and family charter documents

#### TRANSFER PRICING

- Developing and implementing transfer pricing strategy and global policies including value chain analysis projects, preparation of local and global transfer pricing documentation including Country-by-Country Reporting
- Assistance with both unilateral and bilateral Advance Pricing Agreements (APAs), and TP analysis of financial transactions and complex transactions involving intangibles

#### **CUSTOMS AND TRADE**

- Advisory services on customs and trade matters, including tariff classification, valuation especially for related party transactions (including support before the Special Valuation Branch), and compliance with international trade agreements,
- Structuring for optimizing tax incentives and holidays, including by way of bonded warehouse
- Assistance in seeking and obtaining approvals for MOOWR, SEZs, EOUs, STP units, and other schemes like AEOs, including guiding on SOPs/procedures,
- Conducting customs audits to assess compliance with customs regulations

# GOODS & SERVICES TAX (GST)

- Advisory services on complex GST matters including determination of tariff classification, eligibility of exemptions
- Filing of annual return GSTR-9 and 9C including support with preparing reconciliations
- Assistance in GST refunds
- Due diligences, periodic reviews, health checks
- Support on all compliances and procedures including automated GST compliance processes to ensure timely and accurate filings, assistance with documentation





# Service Offerings Overview - India

#### **LITIGATION SUPPORT**

- Comprehensive support for indirect tax litigation, including the drafting of legal responses/appeals, representing before tax/appellate authorities and Tribunal for matters relating to GST, Customs, and erstwhile indirect tax laws
- Providing legal strategy during summons/ investigations, drafting writ petitions and applications for advance rulings, and managing PAN India litigations using automated solutions

# FOREIGN TRADE POLICY (FTP)

- Evaluating potential benefits available under multiple schemes under the FTP, advising on eligibility to claim, compliance conditions, and obtaining Advance Authorization / EPCG licenses / other licenses / refund from DGFT authorities
- Assistance in obtaining various other approvals like norms fixation, relaxation of conditions on meeting criteria, representation before DGFT for relaxations, notices, or inquiries and investigations conducted by DGFT authorities

#### **INCENTIVES**

- Comprehensive
   assistance in navigating
   and securing benefits
   under Production Linked
   Incentive (PLI) schemes
   and other Central
   Government programs,
   including end-to-end
   advisory on eligibility,
   application, and
   compliance
- Identifying potential State incentives available under various State industrial policies, highlighting qualification criteria, and supporting clients in securing such benefits

#### **POLICY ADVOCACY**

- Policy advocacy on Indirect Taxes, Product Regulations, Export Control Regulations, FTP, and allied laws before key ministries, regulatory bodies, and/or government departments.
- Proactively addressing industry concerns via public consultations, whitepapers, and policy recommendations

# PRODUCT & EXPORT CONTROL REGULATIONS

- Comprehensive advisory services on Product Regulations (IS, QCO) and Export Control Regulations
- Assistance in navigating licensing requirements, obtaining permissions from governmental agencies
- Assistance in seeking clarifications from technocrats
- Litigation support services
- Assistance in compliance with Legal Metrology regulations on prepackaged commodities, and providing advisory, compliance, and litigation services





# Service Offerings Overview – Singapore

#### **SINGAPORE ADVISORY**

- Singapore and International Tax Advisory, including Regional Tax Strategy, IP planning and implementation
- Support on cross border tax matters including tax structuring and withholding tax implications
- Tax incentives and grants advisory and implementation
- M&A tax support including group restructuring
- Tax health check and design and review of internal controls
- Advance rulings and approvals from tax authorities on proposed arrangements

### SINGAPORE SET-UP, COMPLIANCE AND SUPPORT SERVICES

- Business and Funds Set up
- Assistance with corporate tax compliance and audit support for queries raised by the tax authorities
- Withholding tax compliance and assistance with Voluntary Disclosure Program
- Support with application for Certificate of Residence
- Transfer Pricing compliance and documentation
- Goods and Services Tax registration and filing of tax returns

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# **Service Offerings Overview – Middle East**

#### **MIDDLE EAST VAT**

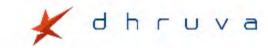
- VAT Impact Assessment, including Financial & Working Capital impact, Legal & IT Impact & Supply-Chain impact
- Awareness Sessions for business functions and verticals
- Redesigning Business Process, including in respect of documents, contracts, invoices, business processes & Technology
- Implementation Support/IT and System Upgrade Recommendation
- Hypercare Support

#### **UAE CORPORATE TAX**

- UAE Corporate Tax impact assessment, including financial impact and high-level assessment of the applicability of the CT regime on in-scope and exempt entities
- Conduct detailed impact assessment on business based on final CT and TP regulations, review pricing of inter-company transactions and policies and highlight potential uncertain tax and TP positions
- Assisting in CT implementation and advising on structural changes to incorporate tax function including CT registration
- Assistance in preparation of CT return and filing of CT return electronically and local TP compliances



# **Key Clients**



# Key clients (1/4)



Aerospace & Defense

- Airbus Defence & Space
- Laminaar Aviation Infotech
- Nova Integrated Systems Ltd
- Rane Group
- Tata Advanced Systems Ltd.



- ATC Tyres
- Bridgestone India
- CEAT
- Cummins Group
- Eicher Motors
- International Tractors
- MAN Energy
- Metro Tyres
- Minda Industries
- Tata Motors
- Volvo Group
- Mahindra & Mahindra



- · Aarti Industries Group
- Louis Dreyfus
- Mahyco
- Meghmani Group
- Sudarshan Chemicals



- Adani Group
- Haldia Petrochemicals Limited
- Hinduja Group
- ITC Limited
- JSW Group
- Nayara Energy Limited
- Reliance Industries
- Tata Group
- Torrent Gas
- Van Oord India Private Limited





# Key clients (2/4)



- ASK group
- Avanse
- Axis Burgandy
- Capital First
- Centrum Capital
- Edelweiss Alterative Asset **Advisors Private Limited**
- Edelweiss promoters
- HDFC Bank
- HDFC Capital
- IDFC
- IIFL

- IL&FS Group
- IndoStar Capital
- JM Financial
- Julius Baer Wealth
- Kotak
- Edelweiss Financial Services
   Nuvama Wealth Management (Edelweiss entity)
  - SBI Mutual Fund (SBIMF)
  - SREI
  - Tata Capital
  - Treeline Investments (a large Singapore Fund)



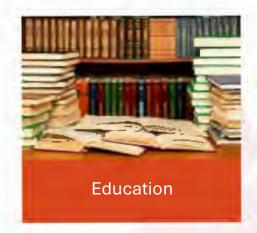
- ABB Group
- Ambuja Neotia
- Coats Limited
- Emaar
- Fluence Energy LLC
- Fuji Electric
- Genus Power
- **Greenply Group**
- House of Hiranandani
- IndoSpace Group
- **Inox Wind**
- Jupiter Wagons Limited
- Kalpataru Group
- Lodha Group

- Oriental Structural Engineers
- Owens corning
- Ralson
- Schneider
- Siemens Group
- Shyam Metalics and Energy Limited
- Sugee Group
- Super Shakti Metaliks (SAI Group)
- Suzlon
- Symphony
- Tata Bluescope
- Timex Group
- Vishwa Samudra group





# Key clients (3/4)



- American School of Bombay
- Apeejay
- Career Point
- Erulearning Solutions (Eruditus)
- Global University Systems
- Goethe Institute
- NIIT Group



- Ani Technologies
- Apar Technologies
- Aurinpro Solutions
- eClerx
- Genpact India
- HCL Technologies
- Hinduja Global Solutions
- IBM
- ITC Infotech Limited
- Juniper Network
- NTT India Group
- Samsung Data Systems
- Syntel
- Tata Technologies
- Virtusa



- Alembic Pharma
- Ami Organics
- Aviva
- Cipla
- Emcure Group
- Felix Pharmaceuticals
- Indoco Remedies
- Lupin
- Mankind Pharma
- Sun Pharma

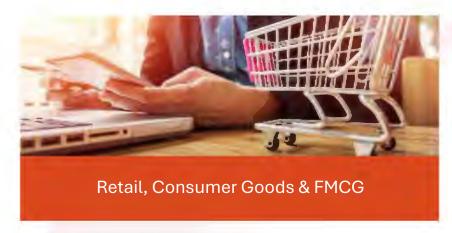


- Apax Partners
- Ares SSG Capital Management
- Bain Capital
- Blackstone
- Brookfield
- Enam Asset Management
- L Catterton
- Macquarie
- Olympus Capital
- OTPP
- Sequoia Capital
- The Everstone Group
- Warburg Pincus
- Xander





### Key clients (4/4)



- Apeejay Surrendra Park Hotels
- Blue Star
- Brain Bees (First Cry)
- Dollar Group
- Grupo Bimbo/Modern Foods
- Hershey India
- Kellogg
- L'Oréal India Private Limited.
- Marico Limited

- More Retail
- Pernod Ricard India
- Veeda
- Voltas
- Whirlpool India



- Allcargo Logistics Ltd
- Apeejay Shipping
- Balaji Telefilms
- Blue Dart Express Limited
- BusyBees
- DHL
- Ecom Express India
- Inox Leisure
- Maersk
- Shyam Telecom Group
- · Siemens Logistics

India Private Limited

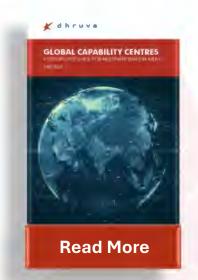
- Sony Network
- The Great Eastern Shipping Company Ltd.
- Transworld



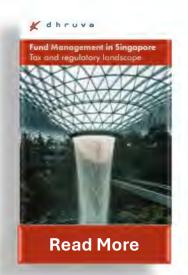
# **Thought Leadership**



### **Publications – 2025**













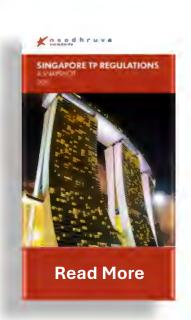


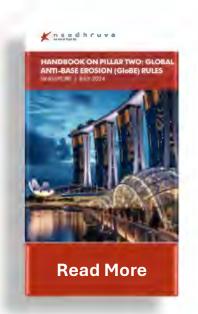




### **Publications – 2024**













### **Publications – 2023**









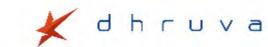








# Leadership



# **Dinesh Kanabar, CEO**

- » Dinesh Kanabar, winner of the "Asia Tax Practice Leader of the Year 2020," is a stalwart in the tax and regulatory domain and is widely regarded among India's top tax advisors. Over the decades, his peers have consistently recognised his deep expertise and unique ability to align business strategies with complex tax and regulatory frameworks, enabling transformative solutions for clients.
- » Before founding Dhruva Advisors, Dinesh held several leadership roles across major professional services firms in India. He served as Deputy CEO of KPMG India, Chairman of KPMG's Tax Practice, Deputy CEO of RSM & Co., and Head Tax and Regulatory at PricewaterhouseCoopers (PwC). He has also been on the Board of Shiv Nadar University in Chennai.
- » Dinesh has worked closely with the Government of India on several critical policy matters. He was a member of the Rangachary Committee, constituted by the Prime Minister to recommend tax reforms for the IT/ITES sector and to develop Safe Harbour Rules. He is also a member of the Body of Trade, formed by the Ministry of Commerce and Industry, and has served on the National Executive Committee of FICCI.
- » He currently serves on the boards of several of India's most prominent companies, including Reliance Industries Limited, Jio Platforms Ltd, Adani Green Energy Ltd, and PVR INOX Ltd, contributing to strategic governance and long-term vision.





### **Our Team**



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**Focus Areas**: M&A Tax and Succession Planning, Transfer Pricing (TP audit defence and litigation, APA, MAP, Global TP Doc., VC Asst., VCS, and BEPS), PE attribution, and Inbound & Outbound structuring



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**Focus Areas:** Corporate tax advisory, Transaction structuring, Tax controversies and litigation. Ashish has significant experience in advising clients across industry spectrum consisting of Media, Telecom, IT & ITeS and other manufacturing sectors.



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### **Our Team**



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### **Our Team**



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Focus Areas: Consulting large local and international businesses from a variety of industries on their VAT management, compliance, advising on M&A transactions and tax structuring, and helping clients in their interactions with tax authorities.





### **Our Team - Senior Advisors**



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