



INTRODUCTION With international trade increasing, taxation also has become an area of sharper focus. Taxation of cross border transactions has become even more significant and with initiatives being taken to harmonise tax treatment of contentious issues, by the G-20 and the OECD, it has become more important to understand how tax treaty concepts like beneficial ownership, TREATY ACCESS, Permanent Establishment etc. are being looked at by different countries. While invoking the provisions of a Double Tax Avoidance Agreement (DTAA or Tax Treaty), it is useful to understand how the other treaty partner is looking at a particular concept. To take a very simple example, India looks at possession of a valid Tax Residency Certificate (TRC) by a non-resident as a necessary condition for availing treaty benefit whereas some other countries may not. It is therefore important to keep track of w.....