



Jimmy Bhatt

Partner

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Practice/s

Direct Tax

Education

LLB (2021)

Chartered Accountant,

Institute of Chartered

Accountants of India (2011)

Company Secretary, Institute

of Company Secretaries of

India (2012)

B.Com., Mumbai University

(2009)

Professional Affiliation/s

The Institute of Chartered

Accountants of India

Jimmy Bhatt is a Partner in the Direct Tax practice at Khaitan & Co, Mumbai. He is a Chartered Accountant and lawyer with over 14 years of experience advising corporate income tax and regulatory matters, including M&A tax, inbound investment structuring and entry strategies, cross-border transactions, transfer pricing, tax treaty interpretation, litigation, trust taxation, and expatriate taxation. Jimmy primarily focuses on M&A tax negotiations, corporate restructuring, international tax (including POEM, PE, GAAR and MFN), transfer pricing, and tax litigation.

Prior to joining Khaitan & Co, Jimmy has worked with PwC and extensively advised clients on corporate taxation, cross border transactions, setting up businesses in India in a tax efficient manner, expatriate taxation and on tax litigation matters.

REPRESENTATIVE MATTERS

In his areas of expertise, Jimmy has represented and advised the following clients::

Media & Entertainment:

- Number of clients on M&A tax, negotiations and documentation concerning business/asset/share acquisition and sale;
- Number of clients on their India entry strategy;
- Number of clients on taxability of the IP and software services;
- A group of CRS companies in relation to their tax litigation before the Supreme Court of India on matters pertaining to permanent establishment and profit attribution;
- A mass media and information major in the United States of America on its ongoing tax litigations in India;
- A leading telecom company in the United Kingdom on evaluating its taxability in India and providing assistance on its ongoing litigation in India;

- A leading professional association in the United Kingdom on approaching alternative tax dispute mechanism to mitigate substantial litigation in India;
- Motilal Oswal Financial Services Limited and Motilal Oswal Securities Limited in relation to merger of Motilal Oswal Securities Limited with its 100% parent entity, Motilal Oswal Financial Services Limited and slump sale of Lending Business of Motilal Oswal Financial Services Limited to its wholly owned subsidiary pursuant to a business transfer agreement;
- An information technology company in Israel on structuring its India entry strategy and its implementation from an Indian tax and regulatory perspective; and
- An international cosmetics major on tax and regulatory matters arising in relation to its exit from the Indian market;
- A software major in the United States of America on structuring its Indian operations in a tax efficient manner and providing regulatory advice;
- A leading multinational manpower supply company in the United Kingdom on developing an optimum tax structure and successfully defending it before the Indian tax authorities; and
- Rakesh Gangwal, Shobha Gangwal, Dr Asha Mukherjee and The Chinkerpoo Family Trust, on their exit in the initial public offering of InterGlobe Aviation Ltd.

Publications and Presentations:

- Jimmy is a regular speaker at various fora on Indian tax matters and international tax matters.
- Jimmy has authored several articles and publication on matters of both domestic and international tax.
- Advised Samsung Electronics Co. Ltd. on applicable legal framework in India for its television streaming platform.