



Sanjay Sanghvi

Partner

One Indiabulls Centre
13th Floor, Tower 1
841 Senapati Bapat Marg,
Mumbai 400 013
India

T: +91 22 6636 5000

F: +91 22 6636 5050

E: sanjay.sanghvi@khaitanco.com

Practices:

Direct Tax
Domestic & International Tax
Tax Litigations/Tax
controversies
Mergers and Acquisitions
(Restructuring)

Education:

LL.B., K.C. Law College, Mumbai
(2009)
Chartered Accountant, Institute
of Chartered Accountants of
India (1995)

Professional Affiliations:

Bar council of Maharashtra and
Goa
Bombay Chartered Accountants
Society
Chamber of Tax Consultants

Sanjay Sanghvi is a Partner in the Direct Tax Practice Group in the Mumbai office. With over 24 years of professional experience in advising and helping clients on domestic and international taxation matters across various sectors of the economy; advising and assisting on M&A transactions and advising on and handling large tax litigations and high end representation before Tax and Transfer Pricing Authorities.

Sanjay's core competency is advising on both domestic and cross border taxation and advising and representing in high end tax representation and tax controversies/ tax disputes matters of Indian corporates; HNIs and MNCs / Foreign companies right up to the Supreme Court of India and before the Authority for Advance Rulings. He is a versatile tax professional with varied experience on advising and representing before Income Tax Appellate Tribunal, High Courts and tax Authorities. Clients value Sanjay for his sound and comprehensive legal tax counselling and the ability to handle tax matters before tax authorities and Courts in India in a time bound manner, besides assisting clients in Tax Investigations related matters.

Sanjay has authored numerous tax articles in various Indian and international tax journals of repute like International Tax Review, IBFD Asia Pacific Tax Bulletin, Business India etc. Sanjay is also regularly quoted in leading business newspapers on important tax rulings and other tax policy related developments in India. His timely and impactful comments and insights on significant tax matters and Government tax policies are quoted by leading business journals in India including prestigious 'Business India'.

Representative Matters:

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

Mergers and Acquisitions and Joint Ventures:

- **E*TRADE Mauritius** before Authority for Advance Rulings in the landmark case concerning applicability of India-Mauritius tax treaty on capital gains taxation issues;
- **Fortune 500 Group** on a large Transfer Pricing related dispute;

Bengaluru

Kolkata

Mumbai

New Delhi



- **A multi-national fast food chain** on an important matter concerning transfer pricing disputes;
- **A global apparel brand** on tax structuring, negotiation assistance for a tax efficient M&A transaction;
- **Mahindra-British Telecom Investment Co (Mauritius) Ltd** – before Authority for Advance Rulings on taxability of capital gains on divestment of equity in an Indian listed Company, under India-Mauritius Tax Treaty including advising and representing before Bombay High Court on a subsequent ‘Writ Petition’ proceedings taken out by the tax authorities seeking to challenge advance ruling;
- **Various Clients (corporates, HNIs, etc)** on cross border foreign assets matters including advising/assistance on multi jurisdictional proceedings;
- **A large corporate group** before Authority for Advance Rulings for a high value cross border transaction in the context of Double Tax Avoidance Agreement;
- **A large MNC group** based in USA for acquiring controlling interest in an Indian entity engaged in credit rating related services;
- **A leading Indian pharmaceutical company and a private sector bank** before the Bombay High Court on a large tax litigation; and
- Tax Due Diligence Review (DDR) for merger of two large **private sector banks** in India.

Academics:

- Assisted (Late) Mr Dinesh Vyas, Senior Tax counsel, Supreme Court of India in revising the renowned commentary of Income-tax law by legal luminary late Mr Nani Palkhivala, Ninth Edition; and
- Assisted Ministry of Finance on issues concerning Non-resident taxation in India through Working Group which was formed by the Ministry under Chairmanship of the then Director General of Income Tax (International Taxation).

Publications and Presentations:

Sanjay has authored articles in various Indian and international legal journals. His contributions include:

- **“India | Paper on ‘Managing Tax Disputes’ – Some Legal and Practical Strategies”**
- **“Undertake Diligence: Income tax issues in buying a business in India”** published by Business India in January 2018;
- **“Is GAAR sour?”** published by Business India in March 2018;



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- **"Should Government relook at AAR mechanism? Is having more benches a solution?"** published by Taxsutra in July 2014;
- **"Indian High Court rules on payments for intra-group services"** published by TP weekly of 'International Tax Review' in June 2014;
- **"Legal Issues in Transfer Pricing"** published by Chamber of Tax Consultants in June 2014;
- **"India: Profit Attribution to Permanent Establishments"** published by International Tax Review in April 2014;
- **"India: The Important and Evolution of Substance"** published by International Tax Review in February 2014 and
- Was a speaker at Chamber of Tax Consultants Seminar on **"Taxation of EPC Contracts"**

Recognitions and Accomplishments:

- Sanjay has been highly recommended for his Tax expertise and excellent service in RSG Consulting Ltd's '2017 Client Recommendations';
- He has been recognised / rated as:
 - (i) one of the leading Tax Controversy Leaders in Asia Pacific in **'International Tax Review'** 2015, 2016, 2017 and 2018 Survey;
 - (ii) as a leading Tax Lawyer by Chambers & Partners' 2015, 2016, 2017 and 2018 and appraised of for 'outstanding level of service' in Direct Tax matters, regulatory instructions and tax litigation by Legal 500 in their 2017 survey; and
- Sanjay was also nominated as one of the leading tax advisors by Euromoney's Tax Advisers Guide 2014 and acknowledged by Asialaw as one of the prominent Lawyers of taxation for the years 2011, 2012 and 2013.