



# Shaily Gupta

## Partner

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**Shaily Gupta is a Partner in the Direct Tax practice group. Prior to joining the Firm, Shaily was an executive director at Vaish Associates Advocates (New Delhi).**

### Practice:

Direct Tax

### Education:

LL.B., Indraprastha Law College,  
CCS University, Meerut (2019)

Chartered Accountant, The  
Institute of Chartered  
Accountants of India (2009)

B. Com. (Hons.), University of  
Delhi, New Delhi (2007)

### Professional Affiliation:

Bar Council of Delhi

Delhi Income Tax Appellate  
Tribunal Bar Association

### Representative Matters

In her area of expertise, Shaily has advised and represented the following clients:

- Various companies on tax due diligence, mergers and acquisitions, transaction structuring and implementation;
- Several multinationals on tax implications arising on capital reduction; cash repatriation; secondment structuring; debt refinancing; PE implications and tax treaty interpretation;
- A Chinese automotive company in search and assessment proceedings;
- A Russian Bank on diverse tax, accounting and regulatory issues in relation to activities to be undertaken upon registering as a Foreign Portfolio Investor in India;
- A Swedish automotive company on tax treaty interpretation related to the MFN clause before Courts;
- A Swiss tobacco company on tax advisory and litigation before Courts.
- Leading UK law firm on landmark ruling involving virtual service PE issue;
- A Large US Glass manufacturing company India's largest publicly listed electronic goods contract manufacturer, ITeS company in tax litigation, advisory (including restructuring) and tax compliance;
- A German automotive group in handling tax compliances; advising and implementation of global restructuring transactions; and
- An India's biggest alcohol company on issues related to GAAR, beneficial ownership and satisfaction of principal purpose test.

## Publications and Presentations:

Shaily has authored the following contributions:

- “India EL 2021 - Expansion of Provisions or Hidden Inconsistencies?”, published on Bloomberg Tax and Bloomberg Terminal (July 2021);
- “INSIGHT: India - Non residents Exempt from Filing Income Tax Return”, published on Bloomberg Tax, International Tax News (March 2020);
- “INSIGHT: India Returns to the Conventional Regime of Taxation of Dividends”, published on Bloomberg Tax, International Tax News (February 2020);
- “International Taxation - Emerging Indian Experience”, published in the book issued by International Fiscal Association (2019); and
- “India’s Equalization Levy—Genesis, Provisions and Interpretation Issues”, published in Tax Planning International, Asia-Pacific Focus, Bloomberg (July 2017).