**DIRECTORATE OF DISTANCE EDUCATION**
**NALSAR UNIVERSITY OF LAW, HYDERABAD**

***M.A. (International Taxation)***

**Academic Year: 2022-2023**

**Fourth Semester - End Semester Examination (June, 2023)**

# Paper IV – 2.4.16. BEPs, MLIs and Future of International Taxation- The way ahead

**Duration of the Examination: 2 ½ hours** **Total Marks : 70 marks**

**INSTRUCTIONS TO CANDIDATES**

a) **Read the instructions carefully and adhere to the same.**
b) **Please mention your DDE ID No., date of the exam, name of the programme & subject on the Answer Sheet and the Additional Answer Sheets, if any.**
c) **The questions to be interpreted as given and no clarification can be sought from the Invigilator.**
d) **Clearly indicate the question numbers while answering them. Answers without question numbers / wrong question numbers will not be evaluated.**
e) **Write the answers clearly and neatly. Answers in illegible handwriting will not be taken into consideration.**
f) **Candidates are prohibited to carry phones or any other electronic devices, books, material etc. in the Examination Hall.**
g) **Copying is strictly prohibited and is considered as a serious academic mis-conduct and the University will take action as it deems fit.**

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**1)** In the backdrop of the Multilateral Instruments (MLI), consider the following questions and answer the questions:

**(i)** Country A - Country B DTAA is a CTA under Article 2 of the MLI as both the countries have notified the concerned DTAA. Country A has ratified the MLI under their domestic laws and has deposited the ratification instrument. Country B has not ratified the MLI owing to political instability in their country. In this regard, Country A wishes to invoke the MLI provisions while accessing the Country A – Country B DTAA. Is the action of Country A valid? **(10 marks)**

**(ii)** Country A and Country B are signatories to the MLI. Both countries have ratified the MLI agreement as per their domestic legislative process. Country A has notified DTAA with Country B as a CTA, however, Country B has not notified DTAA with Country A. What will be the consequence of Country B not notifying DTAA with Country A? **(10 marks)**

**2)** Write a short note **<u>on any two</u>** of the following: **(2 x 25 marks = 50 marks)**

**a)** Two Pillar Approach.

**b)** Green Financing and Taxation in view of Climate Change

**c)** Challenges of Digital Economy and BEPS.

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