

Paper 15

DIRECT TAX LAWS AND INTERNATIONAL TAXATION (DIT) 100 Marks

Module No.	Module Description	Weight
Section A: Direct Tax Laws		60%
1	Assessment of Income and Computation of Tax Liability of Various Entities	60%
2	Tax Management, Return and Assessment Procedure	
3	Grievance Redressal	
4	Penalties and Prosecutions	
5	Business Restructuring	
6	Different Aspects of Tax Planning	
7	CBDT and Other Authorities	
8	E-commerce Transaction and Liability in Special Cases	
9	Income Computation and Disclosure Standards (ICDS)	
10	Black Money Act, 2015	
11	Case Study	
Section B: International Taxation		40%
12	Double Taxation and Avoidance Agreements (DTAA) [Sec.90, 90A and 91]	40%
13	Transfer Pricing	
14	GAAR	

SECTION A: DIRECT TAX LAWS**1. Assessment of Income and Computation of Tax Liability of Various Entities**

- 1.1 Individual including Non-resident
- 1.2 Company
- 1.3 Trust
- 1.4 Mutual Association

2. Tax Management, Return and Assessment Procedure

- 2.1 Return of Income
- 2.2 Assessment Procedure including Dispute Resolution Process
- 2.3 Interest and Fees
- 2.4 Survey, Search and Seizure
- 2.5 Collection, Recovery and Refund of Tax

3. Grievance Redressal

- 3.1 Appeal

- 3.2 Rectification
- 3.3 Revision
- 3.4 Settlement Commission
- 3.5 Advance Ruling

4. Penalties and Prosecutions

5. Business Restructuring

- 5.1 Amalgamation
- 5.2 Demerger
- 5.3 Slump Sale
- 5.4 Conversion of Sole Proprietary Business to Company
- 5.5 Conversion of Firm into Company
- 5.6 Conversion of Private Limited Company/Unlisted Public Company into LLP

6. Different Aspects of Tax Planning

7. CBDT and Other Authorities

8. E-commerce Transaction and Liability in Special Cases

9. Income Computation and Disclosure Standards (ICDS)

10. Black Money Act,2015

- 10.1 Introduction to Black Money Act
- 10.2 Highlights of Black Money Act

11. Case Study

SECTION B: INTERNATIONAL TAXATION

12. Double Taxation and Avoidance Agreements (DTAA) [Sec.90, 90A and 91]

- 12.1 Types of DTAA
- 12.2 Models of DTAA (OECD and UN)
- 12.3 Interlink of DTAA with Section 90 of Income Tax Act, 1961
- 12.4 Overview of Articles in DTAA

13. Transfer Pricing

- 13.1 Transfer Pricing including Specified Domestic Transactions
- 13.2 Determination of Arm's Length Price
- 13.3 Advance Pricing Agreement- Concept and Application
- 13.4 Safe Harbour Rules, Thin Capitalisation and Secondary Adjustment

14. GAAR