**Direct Taxes**

**Decoding Nri Taxation Landscape**

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**Who is Non-Resident Indian?**

A Non-Resident Indian (NRI) is an individual of Indian origin who lives outside India for various reasons - personal, business, employment, education, etc.

The term "Non-Resident" refers to the fact that these individuals do not reside in India on a permanent basis. They may hold Indian citizenship or another country's citizenship. NRIs typically hold Indian citizenship or are of Indian origin but have obtained citizenship of another country.

NRIs maintain connections to India and contribute to the economy through remittances, investments, and cultural activities. Therefore, there are clear provisions for the taxability of NRIs in India.

Two main laws that govern and prescribe the rules for NRI in India are as follows: -

•· Income tax Act – Governs the tax liability of NRI

•· Foreign Exchange and Management Act (FEMA)– Governs all transactions and Investments of NRI

**How to Determine Residential Status?**

Section 6 of Indian Income Tax Act defines NRIs based on the duration of their stay in India.

Under Section 6(1) of Income Tax Act 1961, if an individual stays in India for less than 182 days during a financial year or has been outside India for a total of 365 days or more in the preceding four financial years, he will be termed as NRI.

To determine status, previous year is period of 12 months from 1st April to 31st March. To determine status, number of days of stay in India is to be counted during this period.

Both the Day of Arrival into India and the Day of Departure from India are counted as the days of stay in India (i.e.2 days stay in India). Dates stamped on Passport are normally considered as proof of dates of departure from and arrival in India.

Wherein an assessee has worked outside India for more than 182 days in a given financial year, he will be treated as an NRI and the salary earned thereby for services rendered outside India will not be considered as income taxable in India- *Chandrashekhar Mundirka Singh, Nagpur vs I.T.O. Ward -5(2), Nagpur on 6 January, 2017 (S.M.C.) I.T.A. Nos. 605 & 606/Nag/2016 Assessment Years: 2008-09 & 2009-10.*

**Section 68 read with section 6: -**

Section 68 states that any income earned by an NRI, which is not taxed in the country of residence, shall be taxed in India. In other words, NRIs who do not meet the residential status criteria under Section 6 shall be taxed only on their Indian-sourced income as per Section 68 - Hon'ble Delhi High Court in the case of *DCIT vs. Finlay Corp, Ltd. [2003] 86 ITD 626.*

Section 69A of the Act states that where an NRI has earned income from a source outside India, and such income is not taxable in India, the NRI shall be deemed to have earned such income in India if:

•· The income is received or deemed to be received in India; or

•· The income is accrued or deemed to accrue in India.

Section 69A has significant tax implications for NRIs. If an NRI earns income from a source outside India, but such income is received or accrued in India, the NRI shall be taxed on such income in India.

For example, where an NRI earns rental income from a property located outside India, but the rent is received in India, the NRI shall be taxed on such rental income in India.

Where an NRI earns interest income from a foreign bank account, but the interest is accrued in India, the NRI shall be taxed on such interest income in India.

In a case where in none of relevant assessment years assessee stayed in India for 182 days or more, be regarded as non-resident and, therefore, amount transferred from his foreign account to domestic account could not be brought to tax by invoking provisions of section 68 and also the addition made u/s. 69A of the Act- *ITO Ahmedabad vs Madhav Vasant Dalvi, Ahmedabad on 27 July, 2022 ITA No. 995/Ahd/2019.*

**Jurisdiction of NRI**

As per section 163 of the Act, the Assessing Officer having jurisdiction over the NRI's income in India shall be responsible for assessing their tax liability.

As per section 172 the Assessing Officer having jurisdiction over the NRI's income in India shall be the Assessing Officer of the area where the NRI's agent or manager is located, or where the NRI's business is carried out.

Section 593A allows the Chief Commissioner or Commissioner of Income Tax to designate an Assessing Officer to exercise jurisdiction over an NRI's income in India.

Where a notice has been issued u/s 148A(b) of Income tax Act 1961 to NRI will be considered as invalid due to lack of jurisdiction - *Nimir Kishore Mehta v. Assistant Commissioner of Income-tax [2024] 161 taxmann.com 553 (Bombay) [28-03-2024],* the Bombay High Court.

While Indian corporations are always deemed to be residents of India, companies that incorporate or register outside India will have their residential status determined by the location of control and management.

A company’s residential status is based on the company’s de-facto control and management. Control and management means not merely theoretical control and power i.e., not de jure control and power, but de facto control and power actually exercised in the course of the conduct and management of the affairs of the entity. The domicile or the registration of the company is not at all relevant and the determinate test is where the sole right to management and control of the company lies. - *Mansarovar Commercial Pvt Ltd vs Commissioner of Income-tax, Delhi (Civil Appeal No. 5769 of 2022).*

Control and management of the company lies where the ‘head & brain’ is situated i.e., it is irrelevant where the business is done and income is earned, what is relevant is the place from where the affairs were controlled and managed: -*V.V.R.N.M. Subbayya Chettiar v. CIT, Madras [1951] 19 ITR 168 (SC); Erin Estate, Galah, Ceylon v. CIT [1958] 34 ITR 1 (SC);Narottam and Pereira Ltd. v. CIT [1953] 23 ITR 454 (BOM.); CIT v. Bank of China [1985] 23 Taxman 46 (Calcutta); CIT v. Nandlal Gandalal [1960] 40 ITR 1 (SC).*

**Implications of Residential Status for NRIs/Person OF Indian Origin (PIOs)**

The complexities of determining the residential status for individual NRI/PIO under various statutes and regulations are as follows:

1. The concepts and rules for determining the residential status income-tax laws and FEMA are quite different and it would be possible to be a resident under one law and non-resident under the other.

2. For exemption of income tax in respect of NRE and FCNR deposits investor should be non-resident under FEMA.

3. The special tax rate concessions on income and long-term capital gains on specified assets, purchased in convertible foreign exchange are available to non-residents under the Income-tax Act.

4. A “non-resident” pays tax only on his taxable Indian income and his foreign income (earned and received outside India) is totally exempt from Indian taxes.

A “not ordinarily resident” pays tax on taxable Indian income and on foreign income derived from a business controlled in or a profession set up in India.

An individual upon acquiring the status of “not ordinarily resident” would not pay tax, for a period of two years, on the interest on:

(a) the continued Foreign Currency Non-Resident (FCNR) account;

(b) the Resident Foreign Currency (RFC) account; and

(c) on income earned from foreign sources unless such income is directly received in India or is earned from a business controlled in or a profession set up in India.

**Double Tax Avoidance Agreement (DTAA):**

The Government of India has entered into double taxation avoidance agreements (tax treaties) with several countries with the principal objective of evolving a system for the respective countries to allocate the right to tax different types of income on an equitable basis. Tax treaties serve the purpose of providing full protection to taxpayers against double taxation and also aim at preventing discrimination between the taxpayers in the international field. The NRIs/ PIO would, therefore, be well advised to take advantage of such treaties in tax planning for their investments in India. DTAA can be defined as an “international agreement between two sovereign States reaching an understanding as to how their residents will be taxed in respect of cross border transactions in order to avoid double taxation on the same income”.

If in case, an individual who had earned income from foreign sources was exempt from Indian taxation under the provisions of the relevant DTAA between India and the foreign country involved then he can claim the benefit for the same. - *DCIT v. Rajeev Kumar Agarwal (2010) 124 TTJ 757 (Delhi).*

The Mauritius-India Double Taxation Avoidance Agreement (DTAA) was being misused by foreign investors to avoid paying taxes on capital gains in India. The treaty allowed investors to route their investments through Mauritius to benefit from tax exemptions on capital gains.

The Supreme Court in *Union of India v. Azadi Bachao Andolan* upheld the Mauritius-India DTAA, affirming that tax avoidance through legal means is not illegal. It clarified that challenges to tax treaties should be based on constitutional violations, and misuse of treaty benefits does not automatically invalidate the treaty. The judgment reinforced India’s commitment to international trade norms and clarified the application of tax treaties in the Indian context. - *Union of India v. Azadi Bachao Andolan (2003) 263 ITR 706 (SC)*

The Tiger Global Case involves a legal dispute between Tiger Global entities, private companies incorporated in Mauritius, and Indian tax authorities regarding the taxation of capital gains. Between 2011 and 2015, Tiger Global acquired shares in Flipkart Singapore and, in 2018, transferred them to Fit Holdings S.A.R.L. as part of a broader Walmart acquisition of Flipkart. The dispute arose when Indian tax authorities rejected Tiger Global's claim for exemption under the India-Mauritius Double Taxation Avoidance Agreement (DTAA), arguing that the entities were not independent and were controlled from the U.S., making them ineligible for treaty benefits. The case, which went through the Authority for Advance Rulings (AAR) and the Delhi High Court, centred on whether Tiger Global could claim the treaty benefits and tax exemption under Article 13 of the DTAA, with the High Court ultimately ruling in Tiger Global's favour, upholding the treaty protection- May 16, 2024 Delhi High Court W.P.(C) 6764/2020 & CM APPL. 23479/2020.

The income earned by the foreign insurance company from life insurance premiums paid by Indian residents was not subject to tax in India, considering the provisions of the DTAA between India and the United States.

In case of New York Life Insurance Company, the above provision is well elaborated. A foreign insurer, operating in India through a branch, providing life insurance services was of the view that its income was exempt from Indian tax. The Director of Income Tax (DIT) challenged the taxability of the company's income from life insurance premiums paid by Indian residents. The Supreme Court upheld the India-U.S. DTAA, concluding that income from life insurance premiums paid by Indian residents to a foreign insurance company is not taxable in India. The case is significant in confirming the importance of DTAAs in determining tax liability and clarifying the concept of permanent establishment in international tax law - *Director of Income Tax v. New York Life Insurance Company (2011) 330 ITR 1 (SC).*

**Facilities Available to an NRI:**

The following facilities are available to NRI:

1) Maintenance of bank accounts in India;

2) Investment in shares/securities of Indian companies/firms; and

3) Investment in immovable properties in India.

Each of the aforesaid has been detailed herein below:

**1) Maintenance of Bank accounts in India:**

NRIs are permitted to open bank accounts in India with such banks specially authorised by RBI in this regard. There are mainly the following 3 types of non-resident accounts which can be opened:

a. Non-Resident (External) Rupee Account **(“NRE Account”)**;

b. Foreign Currency Non-Resident (Bank) Account **(“FCNR (B) Account”)**;

c. Non-Resident (Ordinary) Deposit Account **(“NRO Account”)**.

**a. Key Features of NRE Account:**

NRE Accounts are rupee-denominated accounts which can be maintained in the form of savings, current, recurring or fixed deposit accounts.

The deposits can be used for all local disbursements, remittance outside India and investments in India. Transfer to NRE/FCNR account of the account-holder or any other NRI is permitted. The balance in the account (principal plus interest) is freely repatriable. Interest lying to the credit of NRE accounts is exempt from tax in the hands of the NRI.

Returning NRI should take steps to re-designate the NRE Account as resident account or funds should be transferred to Resident Foreign Currency **(“RFC Account”)** immediately upon return to India for taking up employment or on change in the residential status.

**b. Key Features of FCNR (B) Account:**

FCNR (B) Accounts are deposits designated in such foreign currency as may be specified by RBI. The account is maintained in foreign currency in the form of fixed deposits for a period not less than 1 year and not more than 5 years. The account can be opened for inward remittance from outside India, interest accruing on the account, interest on investment, transfer from other NRE/ FCNR(B) accounts, maturity proceeds of investments (if such investments were made from this account or through inward remittance).

The balance in the account (principal plus interest) is freely repatriable. Interest lying to the credit of FCNR accounts is exempt from tax in the hands of the NRI. This amount lying in this account can be used for local disbursements, investment in shares/securities of an Indian company or any other transaction if covered under general or special permission granted by the Reserve Bank of India.

Returning NRI can continue to maintain the FCNR account until maturity. Upon maturity, the account should get converted into resident rupee deposit accounts or RFC account (if the depositor is eligible to open RFC account), at the option of the account holder.

**c. Key Features of NRO Account:**

These are Rupee denominated non-repatriable accounts and can be in the form of savings, current, recurring or fixed deposits. When some Indian National leaves for taking up employment, etc. outside the country, other than Nepal or Bhutan, his bank account in India gets designated as NRO account. The accounts are not convertible / non-repatriable and are maintained in Indian rupees in the form of savings, current and recurring or fixed deposit accounts.

The deposits can be used to make all legitimate payments in rupees. Interest income from NRO accounts is taxable. Interest income, net of taxes is repatriable. Balance amount may be repatriated up to the US $1 million, per financial year.

Returning NRI is required to re-designate the NRO account as resident account immediately upon return.

**2. Investment in Shares/Securities of Indian Companies:**

Reserve Bank has granted general permission to NRIs, for undertaking investments in Indian companies under the automatic route, purchase of shares under PIS (defined hereinafter) and investment in proprietorship/partnership concerns on non-repatriation basis.

Therefore, NRI can directly invest in India in any of the following manners:

I. Investment in shares/convertible debentures of Indian companies on repatriation basis;

II. Investment without repatriation benefits;

III. Investment under Portfolio Investment Scheme (“PIS”);

IV. Other investments with or without repatriation benefits;

V. Investment in partnership/proprietorship firms.

If the shares sold were held on repatriation basis, the sale proceeds (net of taxes) may be credited to his NRE /FCNR(B)/NRO accounts of the NRI, whereas sale proceeds of non-repatriable investment can be credited only to NRO accounts.

As per section 10(4)(i), in the case of a non-resident any income by way of interest on certain notified securities or bonds (including income by way of premium on the redemption of such bonds) is exempt from tax.

**I. Investment in shares/convertible securities of Indian companies on repatriation basis:**

NRI is permitted to freely invest in shares and/or convertible debentures of Indian companies carrying on almost every kind of business in India under automatic route except for few sectors (for eg, Real estate business, agriculture, plantation business, etc.,) wherein prior approval of the Reserve Bank of India is necessary or where the investment can be made only up to a certain percentage of paid-up capital of the Indian company or wherein the investment is prohibited. The investment can be made from NRE or FCNR account or from foreign exchange remitted from abroad. The sale proceeds (after payment of taxes) can be repatriated out of India or credited to NRE / FCNR/ NRO account if the shares are purchased on a repatriation basis.

**II. Investment without repatriation benefits:**

NRIs have been granted general permission to subscribe to the shares/convertible debentures of an Indian company on non-repatriation basis, and general permission is also available to an Indian company to issue shares or convertible debentures by way of new/rights/bonus issue to NRIs on the non-repatriation basis provided that the investee company is not engaged in sectors which are prohibited or require government approval. If the shares are purchased on a non-repatriation basis, the amount of consideration shall be paid by way of inward remittance through normal banking channels from abroad or out of funds held in NRE/FCNR /NRO/NRSR/NRNR account and the sale proceeds (after payment of taxes) can only be credited to the NRSR account when purchased through funds held in such account or NRO/NRSR account when purchased out of funds from inward remittance or funds held in NRE/FCNR/NRO/NRNR account.

**III. Investment under the Portfolio Investment Scheme:**

NRIs can purchase or sell FDI compliant instruments of Indian companies on the Stock Exchanges under the Portfolio Investment Scheme. For this purpose, the NRI has to apply to a designated branch of a bank, which deals in Portfolio Investment. All sale/ purchase transactions are to be routed through the designated branch.

An NRI can purchase shares up to 5 per cent of the paid-up capital of an Indian company on a fully diluted basis. All NRIs taken together cannot purchase more than 10 per cent of the paid-up value of the company. The aggregate limit of 10 per cent can be increased by the Indian company concerned up to 24 per cent, with the approval of its Board of Directors and its General Body through a resolution and a special resolution, respectively.

**IV. Other investments with or without repatriation benefits:**

NRIs can also invest in the following securities:

a) With repatriation benefits:

•· Government dated securities,

•· Treasury bills,

·• Units of domestic mutual funds,

·• Bonds issued by Public sector undertaking bonds (PSU)

·• Shares of public sector enterprise under the dis-investment programme

b) Without repatriation benefits:

• Government dated securities,

• Treasury bills,

• Units of domestic mutual funds;

• National Plan/Savings Certificate.

**V. Investment by NRI in Partnership/proprietorship firms:**

NRIs can also invest by way of capital contribution in any proprietary or partnership concern in India provided the firm or the proprietary concern is not engaged in any agricultural/plantation activities or real estate business i.e. dealing in land and immovable property with a view to earning profit or earning income therefrom, on the non-repatriation basis provided that the amount is invested by inward remittance or out of NRE/FCNR/NRO account maintained with Authorised Dealer. Investment in sole proprietorship concerns/ partnership firms with repatriation benefits can only be done with prior approval of the Government of India.

**3. Investment in Immovable Properties in India:**

An NRI can acquire by way of purchase any immovable property (other than agricultural land/ plantation property/farm house) in India. The purchase price ought to be paid can be paid out of funds received from abroad through normal banking channels or balance held in an NRE/FCNR/NRO account maintained with a bank in India. NRIs can avail housing loan in Rupees from an authorized dealer or housing finance Institution in India subject to conditions.

An NRI may transfer any immovable property in India to a person resident in India. An NRI also does not require any permission to transfer any immovable property other than agricultural or plantation property or farmhouse, to a person who is an NRI.

Citizens of Pakistan, Bangladesh, Sri Lanka, Afghanistan, China, Iran, Nepal, Bhutan, Macau or Hong Kong cannot, without prior permission of the Reserve Bank, acquire or transfer immovable property in India, other than lease, not exceeding five years.

NRIs can remit the sale proceeds of immovable property (other than agricultural land/ farmhouse/ plantation property) in India subject to the following conditions:

1. The immovable property was acquired in accordance with the provisions of the foreign exchange law in force at the time of acquisition by him;

2. The amount to be repatriated does not exceed the amount paid for acquisition of the immovable property received through normal banking channels or out of funds held in FCNR(B) account or NRE account;

3. In the case of residential property, the repatriation of sale proceeds is restricted to not more than two such properties.

**Implications of tax in case of Gifts:**

When a non-resident Indian parent, child or relative transfer cash or property as a gift, it is not taxable in the hands of the resident recipient.

•· Gifts of immovable property abroad are not taxable.

•· Gifts to parents from NRE accounts of children are not taxable.

Gift Tax can be in the form of:

**1. Money/Liquid funds: -**

An NRI is allowed to receive money as gift from a resident Indian under the Liberalized Remittance Scheme (“LRS"), within the limit of USD 250,000 in a financial year. The donor and the recipient need not be close relatives. It is allowed under the FEMA provisions. However, the gift will be taxable in the hands of the NRI recipient (if exceeding INR 50,000) under the Income Tax Act. A resident individual can also gift money to a close relative NRI vide a cheque or net banking to his NRO account in India, subject to overall limit of USD 250,000 in a financial year.

The NRI can take out the money already lying in his NRO account subject to a limitation of USD 1 million per financial year. Definition of Relative in FEMA to mean the definition as per the Companies Act, 2013 which include- spouse, father, mother, son, son's wife, daughter, daughter's husband, brother and sister of the individual.

**2. Immovable Property: -**

Gift of immovable property located in India, is permitted to NRI. Exceptions to the immovable properties to be received on gift by NRI are

• Agricultural land;

• Farmhouse;

• Plantation property.

The gift of immovable property is allowed even to the NRI who is not a relative, however, in case of Income Tax Act, if the gift is without consideration and to a non-relative, the receipt of the gift is taxable in the hands of the recipient where the stamp duty value would be the basis for computing deemed income.

The NRI can take out the sale proceeds of such properties outside India, from his NRO account within the allowed limit of USD 1,000,000 per financial year. This is also applicable where the property has been received by the NRI/ PIO by way of inheritance/ legacy.

A person resident in India can hold, own, transfer or invest in any immovable property situated outside India if such property was acquired, held or owned by him/ her when he/ she was resident outside India or inherited from a person resident outside India.

**3. Shares and Securities in an Indian Company: -**

A resident individual can gift the securities held in an Indian company, such as equity shares, debentures, preference shares, share warrants etc. to an NRI subject to a prior approval from the Reserve Bank of India.

Also, the following conditions need to be fulfilled;

• The NRI recipient is eligible to hold such a security under relevant Regulations;

• The gift does not exceed 5% of the paid-up capital of the Indian company;

• The applicable sectoral cap in the Indian company is not breached;

• The donor and the recipient are ‘relatives' within the meaning of section 2(77) of the Companies Act, 2013; and

• The value of security to be transferred by the donor together with any security transferred to any person residing outside India as gift during the financial year does not exceed the rupee equivalent of Rs. 50,000.

Gift of securities are regulated by the FEMA provisions which puts bar to a certain quantum and also prior approval from the Reserve Bank of India is required and the parties to the gift transaction are required to be “relatives". The gift of securities between the relatives are exempt from taxes, however between non-relatives, it is taxable, where the fair market value of such shares is the basis for computing the deemed tax liability in the hands of the NRI recipient. The NRI can receive the Securities on inheritance and there are no such restrictions. The remittance of sale proceeds (post capital gains tax) should be within the USD 1 million limit.

**4. Interest in LLP: -**

NRI can contribute to the capital of an LLP; however, the LLPs should be engaged in sectors where 100% FDI is allowed under automatic route. There is no clear provision on transfer of an interest in LLP from resident to NRI under the FDI policy. Unless specifically permitted, gift of an interest in LLP to an NRI is prohibited.

**5. Share Issuance: -**

In a move to sync the Indian foreign exchange regulations with Income Tax Act, the government proposed to bring issuance of shares to non-residents above the fair market value within tax purview. This will prevent generation and circulation of unaccounted money from non-resident investors in a closely held company in excess of its fair market value.

This is also to ensure that the shares issued to the non-resident are not at a substantial premium. Any such excess premium would be brought under the tax net and would become taxable as ‘Income from other sources' in the hands of the Indian company.

**Fiscal effects in case of returning NRI:**

If an NRI has returned to India with the intention to stay back, he/she has to inform their bank for a change in residential status in their records and re-designate existing NRO account to resident Savings account. Also, existing NRI Demat account under the PIS cannot be continued anymore and a separate resident Demat account should be opened and shares/units in that account should be transferred to the new account. The FCNR deposits can run till maturity but the earnings in NRE savings account will have to be transferred to a resident savings account, or they even have an option to transfer it to RFC account.

The account is a safe way to park foreign exchange earnings in India. As per the extant RBI regulations, one can open an RFC account and credit their foreign exchange earnings. Interest is taxable and there is a penalty on early foreclosure of RFC deposit. Repatriation is allowed and both funds and interest thereon are free from all restrictions and can be transferred to NRE/FCNR accounts or investment outside India.

As per the Indian income tax law, the moment an individual becomes a resident Indian (which given the income tax rules generally happens a couple of years after one is back in India), their income starts getting taxed as ‘global income’. Of course, the benefit of Double Taxation Avoidance Agreements, or DTAA, may be availed if the overseas income is also getting taxed locally. One effective method to manage one’s global tax obligations, as mentioned above, is to structure one’s stay in India in a manner that allows one to retain Resident and Not Ordinary Resident (RNOR) status for the longest possible duration. In this case, most of the foreign income, with a few exceptions, will remain exempt from taxation.

As per RBI norms, an individual is free to hold, own, transfer assets outside India if such assets were acquired by such person when he was resident outside India or inherited from a person resident outside India. However, if one plans to sell those assets after becoming a resident Indian, there might be a capital gains tax liability under the Indian tax laws. To prevent this, it’s better to consider selling those assets before one acquires Indian resident status.

Returning NRIs assume RNOR (Resident, Non-Ordinary Resident) status under specific conditions:

1. Duration of NRI Status: They must have been an NRI for 9 out of the 10 financial years preceding the year of their return to India.

2. Residency Period in India: Upon their return, they must have lived in India for 2 years or less (equivalent to 729 days or less) in the last 7 financial years.

The Income Tax Department allows RNORs to retain certain exemptions available to NRIs for a period of 2 years after their return. This means that deposits held in foreign currency, which are exempt from tax for NRIs, remain exempt for returning NRIs during this 2-year transition period. However, after this transitional period ends, returning NRIs are treated as resident individuals for tax purposes.

This transitional period provides returning NRIs with some time to adjust to the tax regulations applicable to resident individuals, allowing for a smoother transition.

**Conclusion:**

Understanding the NRI taxation landscape is crucial for Non-Resident Indians (NRIs) to ensure compliance with tax regulations while optimizing their tax liabilities. The tax obligations of NRIs vary based on factors like their residential status, income sources, and the country of residence. Key areas of focus include income from India, such as rental income, interest, and capital gains, which are subject to Indian tax laws. Additionally, NRIs must navigate tax treaties between India and their country of residence to avoid double taxation.

Effective tax planning is essential for NRIs to leverage exemptions, deductions, and the proper classification of income. Staying updated with evolving regulations, including the introduction of GST, changes in tax rates, and reporting requirements, will help NRIs avoid legal complications. Seeking professional advice from tax consultants or financial advisors is advisable for optimizing tax strategies and ensuring compliance with both Indian and foreign tax systems.

By decoding the NRI taxation landscape, NRIs can take advantage of available benefits while ensuring smooth financial operations and securing their financial future.

**(Source : AIFTP Journal December 2024)**