



## Udayan Choksi

Partner

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### Practice:

Indirect Tax

### Education:

LL.B., University of Mumbai  
(2004)  
A.C.A., The Institute of Chartered  
Accountants of India (2002)  
B.Sc. (Hons.), University of  
Warwick (1997)

### Professional Affiliations:

IMC Chamber of Commerce &  
Industry (Member of Indirect Tax  
Committee)  
Bombay Chartered Accountants'  
Society  
(Member of Indirect Tax  
Committee)  
Chamber of Tax Consultants

### Directorships:

Udayan serves as Independent  
Non-Executive Director on the  
boards of public and private  
companies

Udayan Choksi is a Partner in the Indirect Tax practice group in the Mumbai office. He is a senior indirect tax professional and practising counsel.

Udayan has been working in indirect taxes for close to 20 years serving multinational corporations and India's largest businesses. He has been recognised in International Tax Review's listing of Indirect Tax Leaders in India for the past 6 years.

He advises on all indirect taxes including GST, pre-GST taxes, customs and Foreign Trade Policy, and trade remedial measures. He also strategises and represents clients in tax litigations. Udayan has also been actively involved in tax policy initiatives, and been part of representations made to Government on various tax matters.

Udayan's area of focus is tax-optimised supply chains, including valuation aspects across direct and indirect tax regulations, and trade remedial measures. Udayan is also an active member of the tax committees of prominent professional bodies and business chambers.

Udayan is also a member of the boards of private and public limited companies.

### Representative Matters:

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

#### GST Transition

- **Castrol India Limited;**
- **Ion Exchange (India) Limited;**
- **Navin Fluorine International Limited;**
- **Parle Biscuits Private Limited;**
- **Singapore Airlines;**
- **SMA Solar India Private Limited;**



- **Teleperformance Global Services Private Limited;** and
- **Universal Sampo General Insurance Company Limited.**

#### Tax Advisory

- **Baxter India Private Limited** and **Castrol India Limited** on obtaining Authorised Economic Operator (AEO) certification;
- **Cadbury India Limited** on tax optimisation opportunities;
- **FMC India Private Limited** on supply chain restructuring considering 'related' party aspects;
- **Ion Exchange (India) Limited** on the taxability and classification of various EPC contracts;
- **National Stock Exchange of India Limited** and its group entities on taxability of transactions;
- **Parle Biscuits Private Limited** on the applicability of anti-profiteering provisions, compilation and preparation of data and drafting of legal submissions before the National Anti-Profiteering Authority;
- **SMA Solar India Private Limited** on labelling requirements under the Legal Metrology Act and Packaged Commodities Rules; and
- **thyssenkrupp Industrial Solutions India Private Limited** on AOP taxability, consortium structures, and taxability and credits in connection with tender documents and contract negotiations.

#### Transaction Advisory and Due Diligence

- **Navin Fluorine International Limited** and **Confluence Chemicals Private Limited** on alternative transaction structures in an M&A context from a GST, customs and tax regulatory perspective;
- **Nepal Doorsanchar Company Ltd. (Nepal Telecom)** on tax due diligence;
- **Teleperformance Global Services Private Limited** on contracts, taxation of inter se and third-party transactions during transition, and migration of credits in an M&A context from a tax and accounting perspective; and
- A leading auto components manufacturer on tax due diligence.

#### Tax Disputes and Litigations

- **Castrol India Limited** in central excise, customs, service tax and VAT litigations, before various fora, including appeals before the Central Sales Tax Appellate Authority and writ petitions before the Bombay High Court relating to the transitional provisions in GST;



- **Dilip Buildcon Limited** in central excise and customs litigations, before various fora;
- **Housing Development Finance Corporation** on various service tax litigations relating to financial services, before various fora;
- **Navin Fluorine International Limited** before the Gujarat High Court and writ petitions before the Bombay High Court in customs and Foreign Trade Policy litigations;
- **Parle Biscuits Private Limited** and its contract manufacturers in central excise, service tax and VAT litigations, before various fora.
- **Raj Petro Specialities Private Limited** before the Bombay High Court in customs and Foreign Trade Policy litigations;
- **Singapore Airlines** on various service tax litigations specific to the airlines industry, before various fora; and
- **Tata Communications Limited** and **Vodafone India Limited** before the Bombay High Court and Supreme Court of India in customs and Foreign Trade Policy litigations.

#### Advance Rulings

Preparing submissions and representing clients before the Customs Authority for Advance Rulings and GST Authority for Advance Rulings / Appellate Authority for Advance Rulings:

- **Bloomberg Data Services Private Limited** on the classification of electronic equipment;
- **Dosti Group** on the taxability of a business transfer; and
- **The Ruby Mills Ltd.** on the classification of fusible interlining fabrics.

#### Customs SVB

Examining the business and contractual arrangements and transfer pricing arrangements / policies, preparing a pricing justification for Customs, and representing clients in hearings before Customs SVB:

- **Brother International (India) Private Limited;**
- **Castrol India Limited;**
- **Henkel Adhesive Technologies Private Limited;**
- **Nagase India Private Limited;**
- **Perstorp Chemicals Private Limited;**
- **SMA Solar India Private Limited;** and
- **Schreiber Dynamix Dairies Private Limited.**

#### Anti-Dumping / Trade Remedial Measures



**KHAITAN  
&CO**

*Advocates since 1911*

Preparing submissions and representing clients before the Directorate General of Trade Remedies in anti-dumping investigations:

- **BP plc (formerly British Petroleum plc)** entities on imports of purified terephthalic acid (PTA); and
- **NOCIL Limited** on imports of aniline.

### **Publications and Presentations:**

Udayan has authored several articles and papers on various issues relating to Indirect tax, customs and related topics. His contributions are regularly published by the Bombay Chartered Accountants' Society, the Chamber of Tax Consultants, various tax and legal websites, and in leading newspapers.

He is often invited as a speaker at professional seminars by the Institute of Chartered Accountants of India, the Institute of Company Secretaries of India, by various professional bodies and by trade and industry associations. Udayan has also been invited to speak at in-house training programmes for leading business houses.

### **Recognitions and Accomplishments:**

Udayan has been acknowledged for his experience and expertise by:

- **World Tax** (The comprehensive guide to the world's leading tax firms) as "Highly Regarded" in Indirect Tax; and
- International Tax Review** as an 'Indirect Tax Leader' every year since 2015.