

ABSTRACT

**ADVANCE PRICING AGREEMENTS – “ARE WE ENTERING THE GOLDEN AGE
OF TAX CERTAINTY”**

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This article refers to the emergence of Advance Pricing Agreements (APA) in India and corresponding APA provisions. APAs are in way cooperative governance that exists between the multinational corporate taxpayer and the tax administration; if an APA is bi-/multilateral, the negotiation is also between the tax authorities of the other countries. The Article deals with the APA provisions in detail and giving out the various merits and demerits to this system and its application in India. It strives to analyse whether these provisions will act as a game changer in the present scenario or will prove to be another lengthy piece of legislative enactment with lack of implementation.

