



**Ankul Goyal**  
*Counsel*

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*Ankul Goyal, Counsel is part of the Delhi office and is part of taxation practice. Ankul has over 9 years of experience and specializes in tax advisory and litigation. Ankul advises and represents Multi-National Companies across industries on their tax disputes and has secured precedent setting decision for his clients. Global Transfer Pricing Policy and structuring are a particular area of expertise. Ankul also advises and assists clients in disputes, enquiry and investigation emanating under FEMA and Black Money Act.*

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**Experience**

- Counsel (October 2023 – Present)

**Key Practice Areas**

- Taxation

**Recent Work Highlights**

- Concentrix – Landmark ruling on interpretation of Most Favoured Nation clause in tax treaty and consequent reduction of tax rates on dividend income of non-residents
- Assisting and representing LG Group with regards to its Indian tax disputes with special focus on disputes pertaining to the issue of Permanent Establishment & Sponsorship Payments
- Assisting and representing Nokia Group in Indian tax disputes on various issues like transfer pricing, international tax, corporate tax, securing refunds
- Assisting and representing GE Group (Aviation and Steam Power Verticals) in international tax disputes
- Advised World's leading BPO service provider in realigning its Global Transfer Pricing Policy
- Advised and represented a multinational bank in securing a favourable order in a billion-dollar tax dispute pertaining to withholding obligation with respect to investment made in India

**Memberships**

- Bar Council of Delhi (2016)

**Professional Qualifications**

- BSL LLB, ILS Law College, Pune, 2009-2014
  - Diploma in Taxation Laws
  - Diploma in Corporate Laws
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