

**GOVERNMENT OF INDIA  
FINANCE  
LOK SABHA**

UNSTARRED QUESTION NO:3986  
ANSWERED ON:03.12.2010  
TAX ON MERGER  
Lal Shri Pakauri

**Will the Minister of FINANCE be pleased to state:**

- (a) whether the domestic and foreign companies commit irregularities in the payment of tax arising out of their merger; and  
(b) if so, the names of those companies which are under investigation by Central Board of Direct Taxes (CBDT)?

**Answer**

MINISTER OF STATE IN THE MINISTRY OF FINANCE(SHRI S. S. PALANIMANICKAM)

(a) & (b)

(i) A few cases relating to cross border merger and acquisition deals have been identified for further examination by the Department. These deals are being examined for possible tax implications. Some of these cases are:

- # Deal of Vodafone International Holding BV with Hutchison Telecommunication for acquiring Hutchison Essar Ltd
- # Deal of Sanofi Pasteur Holding with Merieux Alliance and Groupe Industrie! Marcel Dassault for acquiring Shantha Biotechnics Ltd
- # Deal of New Cingular Wireless Services Inc with AT&T Mauritius for acquiring Idea Cellular Ltd
- # Deal of SKR BPO Services Pvt Ltd with Barclays (H&B) Mauritius Ltd for acquiring Intelnet Global Services Pvt Ltd
- # Transfer of stake in GE Capital International Services/Genpact India

(ii) Information regarding domestic cases is being collected.