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Meaning of international transaction.. 92B. (1) For the purposes of this section and sections 92, 92C, 92D and 92E, "international transaction" means a transaction between two or more associated enterprises, either or both of whom are non-residents, in the nature of purchase, sale or lease of tangible or intangible property, or provision of services, or lending or borrowing money, or any ...

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International Transactions | U.S. Bureau of Economic ...
In taking this plea, what learned counsel for the assessee essentially ignores us is that unlike, for instance, in taxation of capital gains- as held by Hon'ble Supreme Court in the case of Vodafone International Holdings BV (supra), existence of "legal rights" is not a sine qua non for treating a transaction as an international transaction under section 92B.

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CHAPTER 24 TAXATION OF INTERNATIONAL TRANSACTIONS ...
What is International Transaction?. Section 92B of the Income-tax Act, 1961 defines the term "international transaction as under: "92B. (1) For the purposes of this section and sections 92, 92C, 92D and 92E, "international transaction" means a transaction between two or more associated enterprises, either or both of whom are non-residents, in the nature of purchase, sale or lease of ...

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