



Shardul Amarchand Mangaldas



Gouri Puri

Partner
Tax

Gouri Puri is a Partner with the Tax practice group of the Firm.

Gouri works closely on international tax planning matters and digital taxation. She is experienced in tax aspects of mergers and acquisitions, investment structures, establishment of funds and private capital arrangements, joint venture formations, restructurings, spin offs, cash-repatriation techniques and cross border transactions. She has represented clients such as Facebook, Walmart, Ctrip, Flipkart, Hutchison Telecommunications International Limited, Bata, Kagome, American Express, American Insurance Group, among others.

Gouri is actively involved in various thought leadership initiatives and policy advocacy through her collaboration with industry chambers, business and legal media. She regularly contributes articles to leading business journals and publications including Mondaq, Indian Business Law Journal, Legal 500, Thomson Reuters, Economic Times, Financial Express, Mint, Financial Times, and Indian Express.

Gouri holds a master's degree in taxation laws from Harvard Law School. Gouri is admitted to the New York State Bar and Bar Council of India. Prior to Shardul Amarchand Mangaldas, she has worked as a tax associate with Lakshmikumaran and Sridharan.

Select Experience Statement

- **Walmart** on its US\$ 16 billion acquisition of Flipkart's e-commerce business
- **Ctrip** on its US\$ 1.3 billion acquisition of Naspers's stake in Makemytrip.com.
- **Facebook Inc. and Whatsapp Inc.** on taxation of their business in India
- **Navyuga group** on sale of its stake in Krishnapatnam Ports Company Limited (to Adani Group) for an Enterprise Valuation of US\$ 2 billion
- **Apollo Group** on sale of its majority stake in Apollo Munich Health Insurance Company to Housing Development Finance Corporation Limited.
- **Walmart Inc.** on acquisition of Flipkart's shares from its founder, Binny Bansal for US\$ 76 million.
- **Prodigy Finance Limited** on its financing and securitization business involving Indian borrowers

Location

- Delhi

Education

- LL.M (Taxation), Harvard Law School
- BBA LL.B, Symbiosis Law School

Practices

- Tax

Professional Membership

- New York State Bar
- Bar Council of Delhi





- **Gates Foundation and Doctors without Borders** in India on grants and operations in India
- **Kagome** in the sale of its indirect investment in Tasty Bites to Mars International
- **American Express** in its acquisition of Payback India.
- **Hutchison** in connection with the tax controversy on the indirect sale of Hutchison's telecom business to Vodafone.
- **Abu Dhabi National Oil Company** on settling India's first energy agreement for building strategic crude oil reserves.
- **US embassy, UK Government, UNICEF, Asian Development Bank**, etc. on issues relating to tax privileges and immunities.
- **Dassault** on supply of goods and provision of services to the Ministry of Defense, Indian Government
- **American Insurance Group** and **Blackstone** on structuring back office operations
- **Stadler, Reunert, World First, Babilou** and **Airborne Inc.** on structuring investments and technique for cash repatriation.
- **Vodafone, Dharampal Satyapal Limited, HT Media** and **Jindal Stainless Limited** on corporate restructurings.
- **Government of Guernsey** on matters pertaining to exchange of information with India
- **Ireo** and **Rabo** on structuring on setting up private equity funds.
- Foreign multinationals on structuring inbound investments, entailing the interpretation of source rules, evaluation of permanent establishment exposure and application of tax treaties.
- Clients in the telecommunications and out of home advertising industry on transfer pricing matters.
- Large domestic and multinational businesses on Indian income tax implications arising from restructuring of business and ownership interests.
- Advised on the income tax implications arising from land development and real estate service franchise agreements.
- Indian entities, from a tax and regulatory perspective, on structuring outbound investments, entailing the assessment of income tax exposures and obligations under the income tax laws of foreign jurisdictions.
- Rendered litigation support to several clients in income tax proceedings before the Authority of Advance Rulings, Dispute Resolution Panel, Income-tax Appellate Tribunal and the Supreme Court of India.

