

Government of India
Ministry of Finance
Department of Revenue
Central Board of Direct Taxes

New Delhi, 31st March, 2025

PRESS RELEASE

CBDT Signs 174 Advance Pricing Agreements in FY 2024-25

The Central Board of Direct Taxes (CBDT) entered into a record 174 Advance Pricing Agreements (APAs) with Indian taxpayers in FY 2024-25. These includes Unilateral APAs (UAPAs), Bilateral APAs (BAPAs) and Multilateral APAs (MAPAs). With this, the total number of APAs since the inception of the programme has reached 815, comprising 615 UAPAs, 199 BAPAs and 1 MAPA.

This marks the highest number of APAs signed in a single financial year since the programme's launch. Of the 174 APAs signed, 65 were BAPAs, the highest number of BAPAs finalized in any year so far. These were a result of Mutual Agreements with India's treaty partners, including Australia, Japan, South Korea, The Netherlands, New Zealand, Singapore, the UK, and the US.

CBDT has maintained a consistent pace in concluding APAs, having signed 125 in FY 2023-24 and 95 in FY 2022-23. Notably, this year also saw the signing of India's first-ever MAPA. Additionally, on 27th March, 2025 a record 34 APAs were signed on a single day.

The APA Scheme aims to provide certainty to taxpayers in the area of transfer pricing by specifying pricing methods and determining the arm's length price of international transactions in advance for up to five years. BAPAs offer the added benefit of protection against potential or actual double taxation.

The APA programme has significantly contributed to the Government of India's mission to enhance ease of doing business, particularly for multinational enterprises engaged in extensive cross-border transactions. CBDT recognizes the collaborative spirit of taxpayers and values their role as key stakeholders in the successful implementation of the APA programme.

(V. Rajitha)
Commissioner of Income Tax
(Media & Technical Policy) &
Official Spokesperson, CBDT