India abroad:
Navigating the global landscape for overseas investment

August 2025

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FORE

India's growing prominence in the global investment landscape reflects not just economic momentum but also the ambition and strategic intent of its businesses. Over the past few years, Indian companies have expanded their global footprint. They are investing overseas to secure resources, access new markets, and strengthen their long-term competitiveness.

This publication, India abroad: Navigating the global landscape for overseas investment (2025 edition) takes a closer look at the structures and jurisdictions that are shaping this outward journey. As Indian enterprises explore opportunities beyond borders, they are navigating a rapidly evolving landscape. They must balance commercial goals with tax, regulatory and operational considerations.

The choices around investment structures and jurisdictional routes are no longer straightforward. From traditional hubs to newer, more agile jurisdictions, the decision-making now demands a more nuanced lens. This lens must consider cost, compliance, substance and long-term sustainability. Layered onto this are global shifts, including OECD-led reforms, heightened substance requirements and a broader push for transparency and responsible investing. All of these factors are influencing how Indian companies chart their course abroad.

WORD

While brief references have been made in this report to certain global developments—such as the recent announcement of tariffs by the United States and the India-UK Free Trade Agreement— these developments continue to shape the broader investment landscape. However, the scope of this report remains focused on evaluating investment structures and jurisdictional pathways. In particular, it highlights the growing strategic relevance of intermediary jurisdictions and examines the emerging trends reshaping how Indian businesses structure their outbound investments.

This report seeks to provide practical insights into these emerging dynamics. By unpacking jurisdictional trends, evolving structural preferences and regulatory headwinds, it aims to support business leaders as they rethink and reimagine their global strategies. We hope you find the insights informative.

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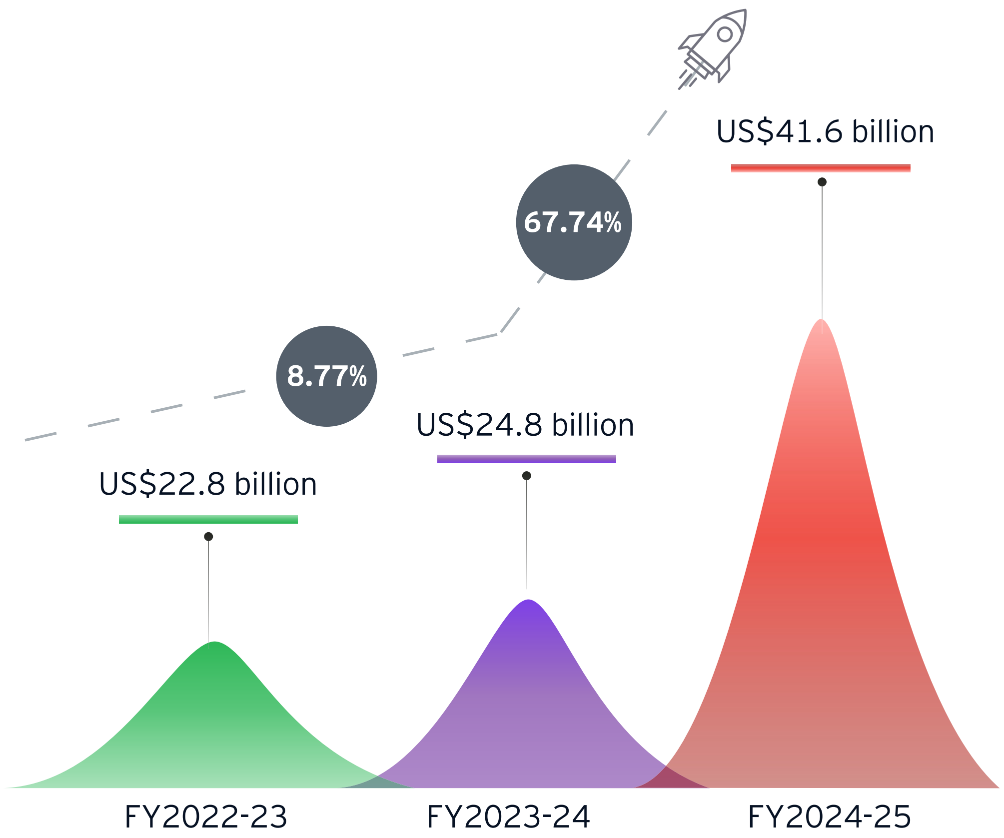
CONTENT

Introduction

India's global investment ambitions have entered a new era—shaped by visionary strategies, supportive policies and robust domestic capital markets.

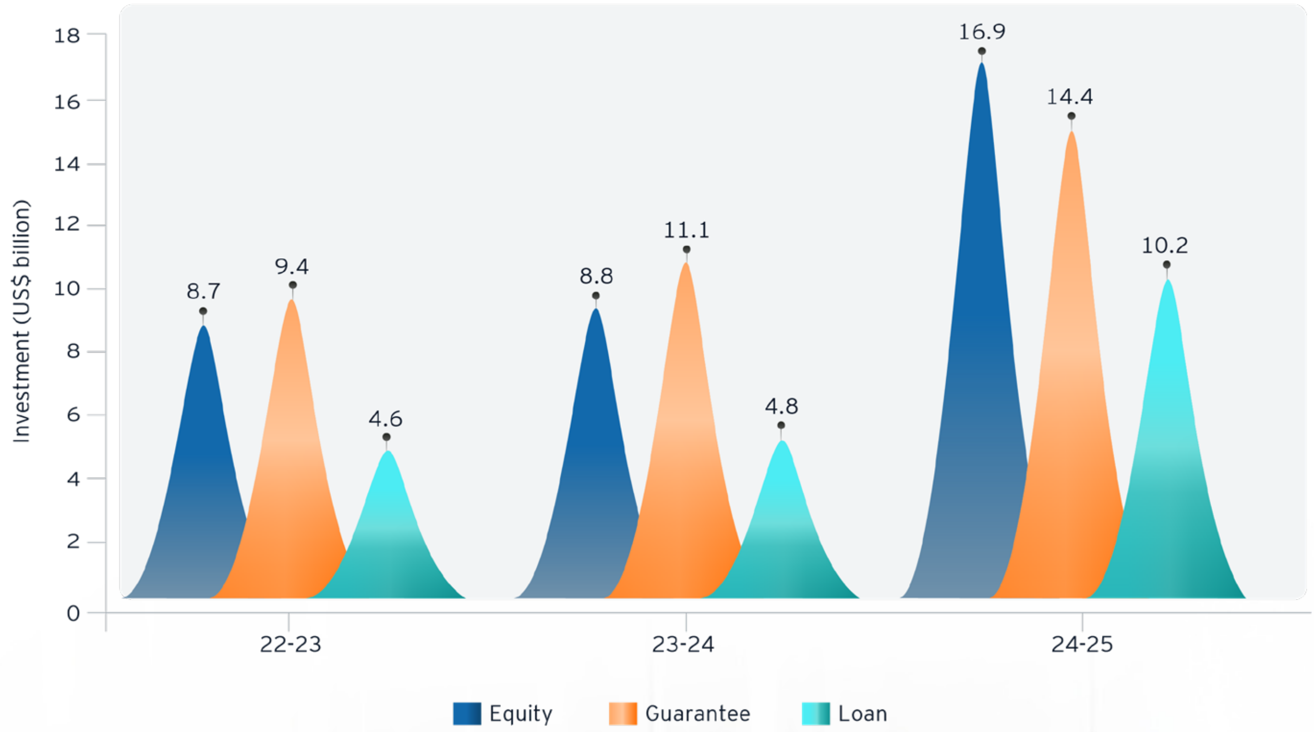
In 2025, Indian enterprises are navigating both unprecedented opportunities and emerging complexities. These complexities arise from the current geopolitical environment and evolving trade landscape as they seek to strengthen their presence on the world stage.

The sharp rise in Outward Direct Investment (ODI) reflects this momentum. As per the Reserve Bank of India (RBI) data ,ODI grew steadily from



The number of outbound investments also rose by about 15%, showcasing the growing confidence of Indian companies in expanding their international presence.

ODI Investments in (US$ billion)



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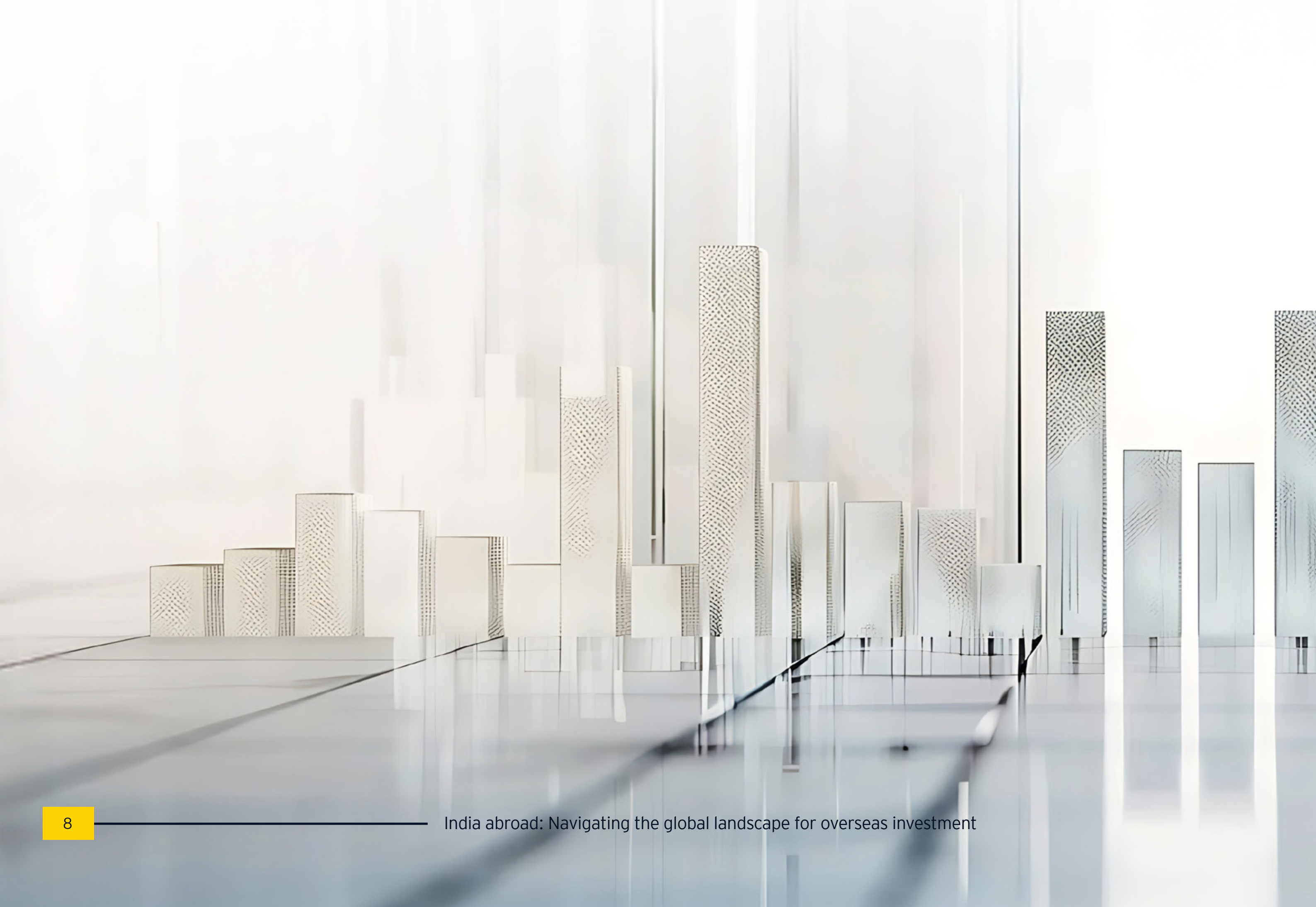
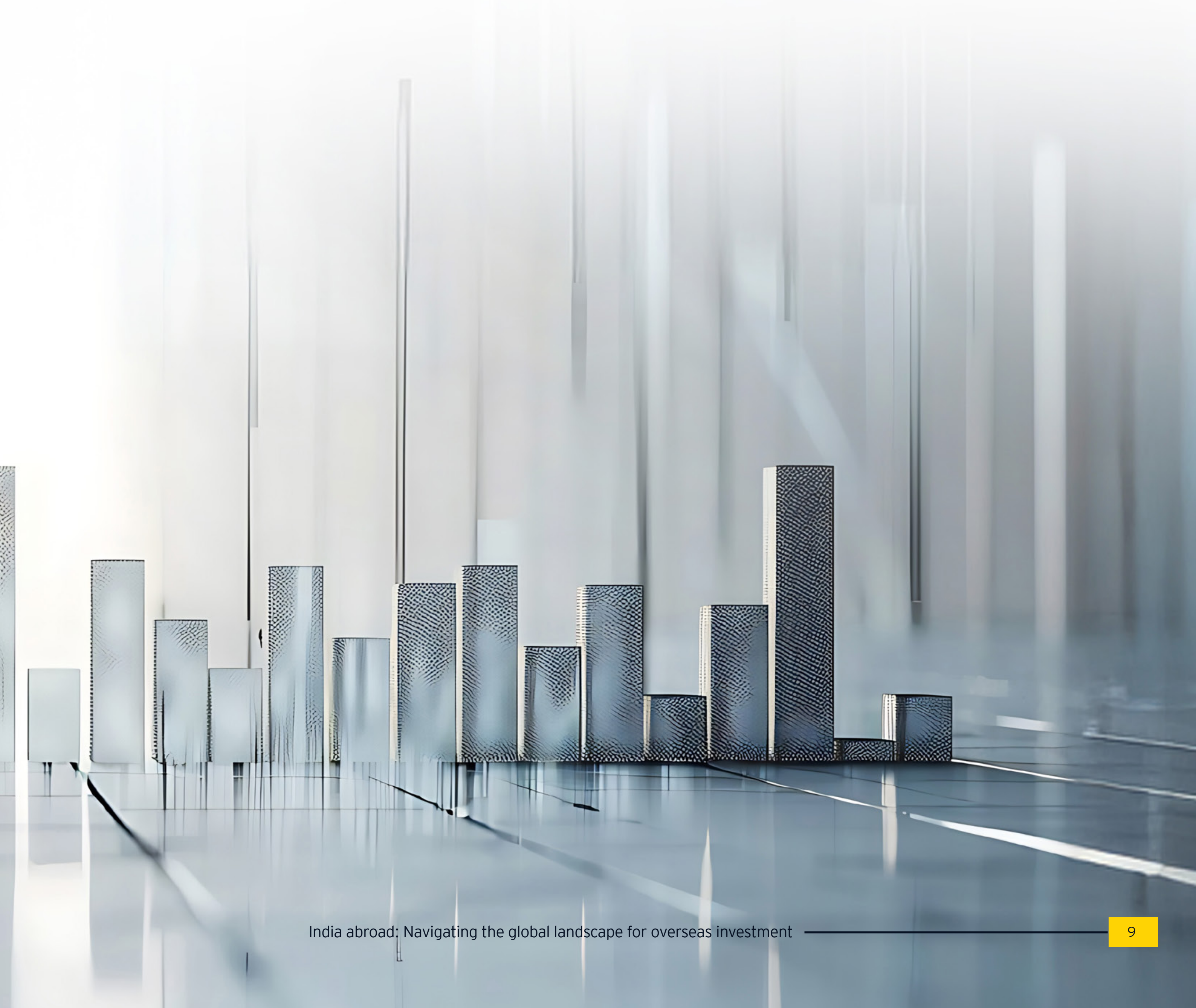


As Indian enterprises continue to expand their global footprint, the choice of destination markets is evolving. This evolution is shaped by shifting geopolitical realities and emerging economic opportunities. Today, businesses are not merely reacting to global developments; they are actively rethinking where and how they invest to secure their future.

Consider recent policy moves by the US. The announcement of targeted import tariffs and the wide-ranging tax changes enacted through the ‘One Big Beautiful Bill’ have added fresh layers of complexity for companies operating across borders. For Indian businesses, these changes are more than just headline news — they are strategic signals that necessitate a decisive pivot in outbound direct investment strategies.

We see Indian enterprises broadening their horizons, diversifying beyond the traditional focus, and accelerating expansion into Europe, the Middle East, Southeast Asia and Africa. This reflects a deeper strategic realignment, i.e., reconfiguring global value chains, advancing free trade agreement (FTA) negotiations, and prioritizing jurisdictions that offer tariff and cost advantage along with stability in an uncertain trade environment.

At its core, Indian companies are strengthening resilience, de-risking operations, and creating more balanced global revenue streams.

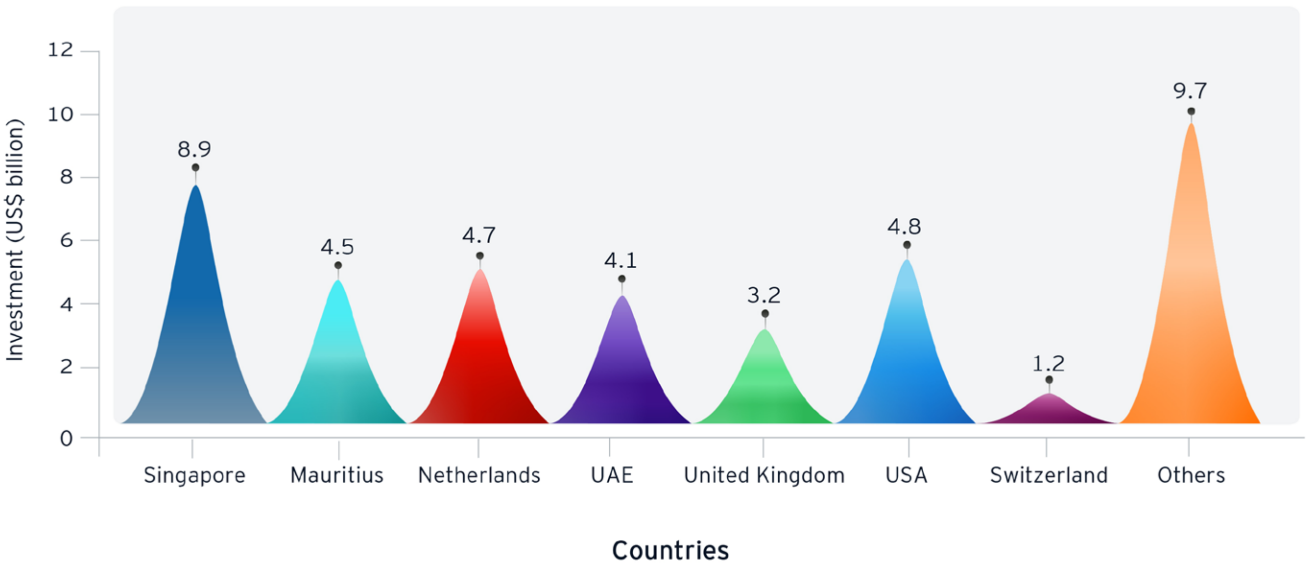


Evolution of jurisdictional preferences and outbound structures

Indian companies are proactively recalibrating their jurisdictional strategies and outbound investment structures to keep pace with shifting global dynamics and domestic reforms. This evolution reflects not just a response to external challenges, but also a deliberate move to future-proof their global operations.

In this section, we explore how outbound investment patterns have transformed over time. We highlight key drivers behind these shifts, the rise of new destination markets, and the increasing significance of Gujarat International Finance Tec-City (GIFT City) as an emerging hub for international financial activity.

FY 2024-25 ODI Investments (US$ billion)



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The above chart illustrates how Indian business groups have allocated outbound investments across major global jurisdictions. Notably, there is a strong focus on sectors such as business services, IT/ITES, energy, automotive, pharmaceuticals and hospitality. While these jurisdictions appear as reported ODI destinations in Reserve Bank of India data, it is important to look deeper. Many of these locations serve as intermediary hubs, with the ultimate investments directed toward end-market jurisdictions where actual commercial activities and value creation take place.

2.1 Historically preferred intermediary jurisdictions

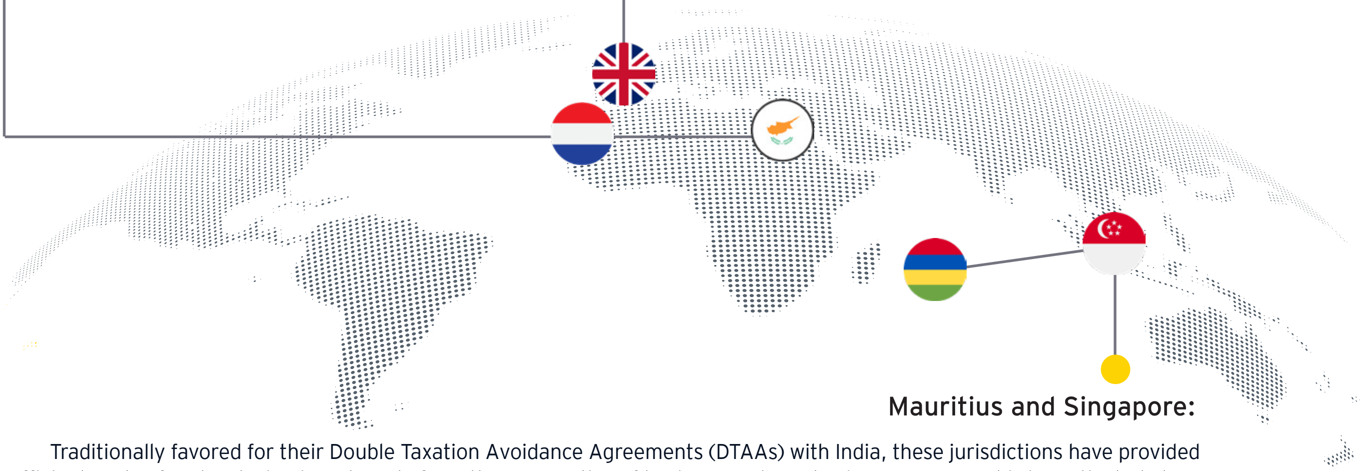
Historically, Indian outbound investments were channeled through a select group of core jurisdictions. This approach was shaped by long-standing trade relationships, favorable regulatory frameworks, and, in many cases, geographic proximity. Key examples include:

Netherlands and Cyprus:

European jurisdictions like the Netherlands and Cyprus gained traction as they offered unique tax treaties and strategic entry points into the broader European market.

United Kingdom:

The United Kingdom, being a developed economy as well as favorable tax jurisdiction, attracted investments from Indian companies looking to access large consumer markets, advanced technology, and strong legal frameworks. These frameworks provide robust intellectual property protection—particularly in sectors such as IT, pharmaceuticals and manufacturing.



Mauritius and Singapore:

Traditionally favored for their Double Taxation Avoidance Agreements (DTAAs) with India, these jurisdictions have provided efficient routes for structuring investments from the perspective of business and non-business reasons. This is particularly true in relation to financial services and holding companies. Mauritius became a dominant jurisdiction owing to its capital gains tax exemptions and treaty benefits. Meanwhile, Singapore's robust financial infrastructure, strategic location in Southeast Asia, and favorable tax regime have maintained its appeal. Recent treaty revisions, however, have reduced some of the traditional advantages offered by these hubs.

2.2 Key drivers influencing shifts to new jurisdictions

Several factors are prompting Indian companies to rethink their jurisdictional choices and actively seek out new investment destinations. This shift reflects not only the need to adapt to an evolving global environment, but also a broader ambition to build more resilient, future-ready international operations. Key drivers behind this diversification include:

Geopolitical realignment and supply chain diversification:

Geopolitical tensions and the imperative for supply chain resilience have catalyzed a 'China+1' strategy. This strategy has led to increased interest in Southeast Asia, Africa and the Middle East.

Energy transition investments:

With a growing emphasis on sustainability, Indian firms are expanding investments in renewable energy projects. This includes solar and wind, particularly in regions with favorable regulatory policies.

Resource security:

Strategic investments in resource-rich regions, such as South America and Australia for lithium extraction, are aimed at securing critical supply chains and supporting India's clean energy transition. Based on publicly available information, following the Russia-Ukraine conflict, India's oil imports from Russia have increased However, stricter sanctions on Russian shipping and financial companies have prompted Indian companies to explore alternative energy sources, including solar projects in Africa and strategic investments in Latin America.

Tax reforms and treaty revisions:

Amendments to tax treaties have reduced the earlier tax benefits associated with historically preferred jurisdictions. Corporations have therefore pivoted their choices to jurisdictions that justify economic substance and strategic benefits beyond tax optimization.

Rise of emerging markets:

Rapid economic growth in Southeast Asia, Africa and parts of Latin America is opening new market opportunities. These regions offer an expanding consumer base, a rising middle class, and sector-specific growth potential in areas such as renewable energy, infrastructure and digital services.

Trade agreements and strategic alliances:

India's proactive engagement in bilateral and multilateral trade agreements is facilitating preferential market access. The India-Middle East-Europe Economic Corridor (IMEC), India-Australia Economic Cooperation and Trade Agreement (ECTA), India-UK Free Trade Agreement further signals a strategic pivot towards enhanced connectivity and investment flows across key regions.

Technological competition:

The global race for technological leadership in sectors such as artificial intelligence and semiconductor manufacturing is influencing investment flows. This is prompting Indian firms to acquire overseas assets in high-growth technology sectors.

Focus on ESG and sustainability:

A growing global focus on Environmental, Social and Governance (ESG) factors is increasingly shaping overseas investment decisions — and Indian companies are no exception. Businesses are aligning their cross-border strategies with international sustainability standards. They are favoring jurisdictions that offer strong ESG frameworks, incentives for renewable energy, and opportunities linked to sustainable infrastructure. In the European Union, for instance, regulatory developments such as the Corporate Sustainability Reporting Directive (CSRD) and the Carbon Border Adjustment Mechanism (CBAM) are reinforcing the imperative for ESG integration. These measures highlight the importance of embedding sustainability into business models—not just to ensure compliance, but also to mitigate risks and drive long-term value creation. As ESG considerations move from being a differentiator to a core business requirement, Indian companies are positioning themselves to compete and thrive in this new global order.

Regulatory and political stability:

As Indian companies explore new markets; they prioritize regions with stable regulatory and political environments that offer investor protection and operational ease.

2.3 Emerging intermediary jurisdictions

While traditional intermediary jurisdictions such as Singapore, the Netherlands and Mauritius continue to play a significant role in structuring outbound investments, the landscape is clearly shifting. Evolving global tax norms, heightened regulatory expectations, and changing strategic priorities are prompting Indian companies to look beyond these established hubs. Increasingly, businesses are exploring emerging destinations that offer complementary advantages—whether through favorable tax and trade frameworks, access to new markets, or alignment with sustainability and digital economy goals:

Middle East (UAE)

Beyond their traditional role in energy investments, the United Arab Emirates (UAE) is broadening opportunities across infrastructure, technology and tourism. Over the years, the UAE has gained a lot of investor confidence and is emerging as a key investment destination with the introduction of 9% corporate tax. Strategic agreements such as the India-UAE Comprehensive Economic Partnership Agreement (CEPA) are generating new avenues for Indian investment. This is beyond trading company setups for which UAE attracted investments from Indian HQ groups.

Europe (Luxembourg, Switzerland)

Europe remains a significant destination for Indian investors, with Luxembourg and Switzerland standing out for their favorable investment climates. Luxembourg, as a global financial center, offers opportunities in investment funds and green finance initiatives. Switzerland's stable economy, IP protection laws and advanced infrastructure make it an attractive investment destination.

2.4 GIFT City as a holding and treasury jurisdiction for outbound investments

GIFT City in Gujarat is redefining how Indian enterprises structure their outbound investments. Positioned as a compelling onshore alternative, GIFT City blends the advantages of traditional offshore jurisdictions with the regulatory clarity, cost efficiencies, and operational proximity that come from being based in India.

Recent measures, over the past two years, by the International Financial Services Centres Authority (IFSCA)—the regulator overseeing GIFT City—have added further momentum. Regulatory relaxations, fiscal incentives and a business-friendly framework are encouraging companies to route their global investments through this emerging hub. The result: lower compliance costs, enhanced operational flexibility, and a future-ready platform that aligns with India’s broader globalization agenda. Some of the key features that make GIFT City an attractive choice include:

Regulatory framework and tax incentives:

GIFT City provides a business-friendly regulatory environment with streamlined processes. It offers attractive tax benefits, including a 10-year tax holiday for International Financial Services Centre (IFSC) units and exemptions from certain taxes. This positions GIFT City as a cost-effective hub for international financial activities.

Benefits as a holding and treasury jurisdiction:

The structure of GIFT City is designed to facilitate efficient holding company structures and treasury operations for Indian multinationals. It enables easier fund mobilization, repatriation of profits, and effective management of global investments.

Strategic hub for global expansion:

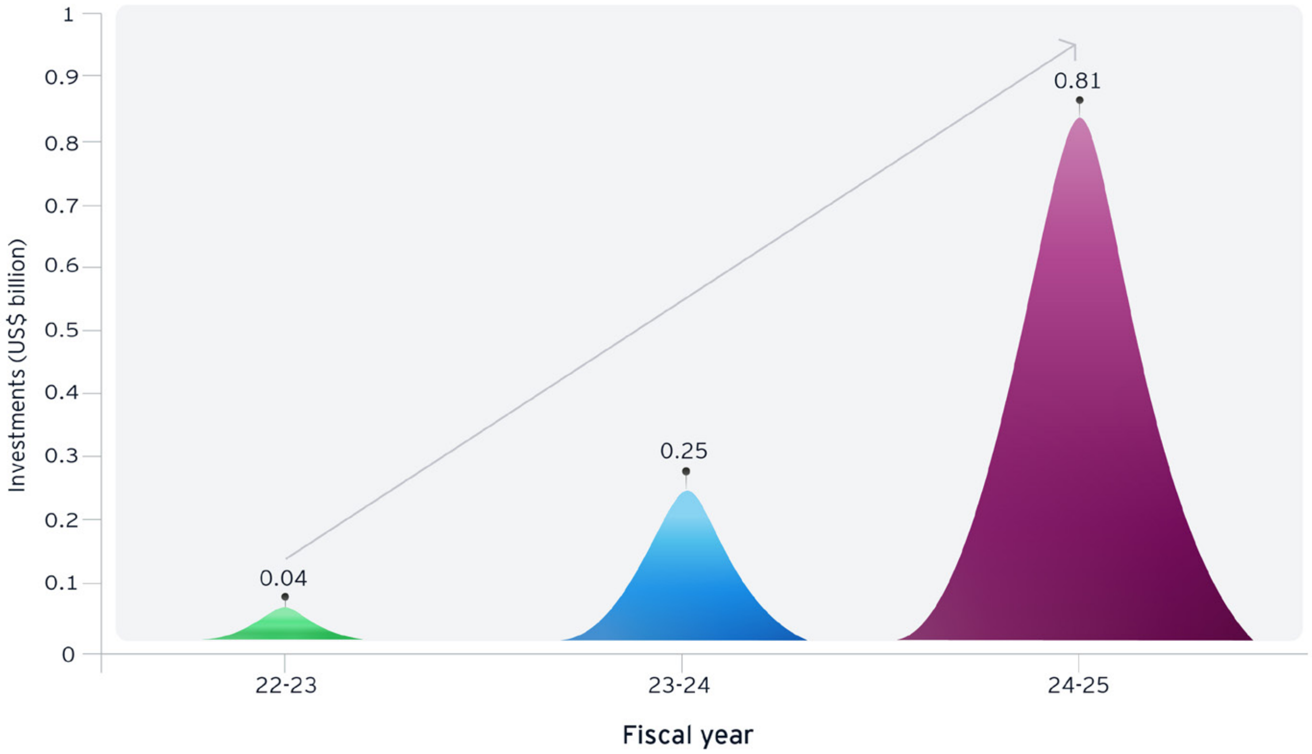
By leveraging the capabilities of GIFT City, Indian companies can streamline their outbound investment structures, reduce compliance burdens, and capitalize on a growing network of international financial institutions.

POEM and tax residency:

GIFT City structures allow Indian companies to retain their place of effective management (POEM) and tax residency in India. This helps them avoid permanent establishment (PE) and substance-related challenges in foreign jurisdictions while still enjoying the benefits of an international financial hub.

The growing preference for GIFT City among Indian companies is further underscored by a 100% increase in investments over the past two years.

ODI Investments in IFSC GIFT City (US$ billion)



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As GIFT City continues to expand, it is fast emerging as a pivotal platform for Indian businesses looking to optimize their global investment footprint. By strategically rethinking jurisdictional choices and leveraging emerging financial hubs like GIFT City, Indian enterprises are not only adapting to an evolving global landscape—they are positioning themselves to lead within it. This forward-looking approach enables them to unlock new avenues for sustainable, diversified outbound investments while strengthening resilience and long-term competitiveness on the world stage.

International developments impacting Indian outbound investments

3.1 OECD BEPS and Pillar reforms

The Organisation for Economic Co-operation and Development (OECD) has initiated the Base Erosion and Profit Shifting (BEPS) initiative. This initiatives aims to ensure that profits are taxed where economic activities occur. It addresses tax avoidance strategies that exploit gaps in international tax rules. Building upon the initial BEPS actions, the OECD introduced two major Pillars impacting multinational enterprises (MNEs):

Pillar One

Allows source countries (market jurisdictions where customers are located) to tax a share of the profits of multinational companies doing business activities in such source jurisdictions. The agreement to implement this is still being finalized and has not yet been approved.

Pillar Two

Introduces a 15% global minimum tax for MNEs with turnover above €750 million. Implementation is progressing globally, with the EU, UK, Australia, Japan, and others taking the lead. The US has adopted a nuanced stance on the OECD's Pillar reforms, adding further complexity to the global tax framework affecting Indian MNEs. The US has expressed reservations regarding the imposition of a global minimum tax. It emphasizes the need to protect national competitiveness and retain fiscal policy sovereignty. These positions signal that US policymakers are rigorously evaluating how the reforms might affect cross-border investments and domestic economic interests.

In this evolving landscape, Indian MNEs must reassess their global tax strategies, considering:

Country-by-Country Reporting (CbCR):

Enhanced transparency mandates MNEs to report income, profits, taxes paid and economic activity by jurisdiction. This facilitates better assessment of tax liabilities.

Pillar Two notifications:

MNEs falling under the scope of Pillar Two will face new notification requirements to inform tax authorities about their status and potential tax liabilities under the global minimum tax rules.

GloBE[1] Information Return:

Pillar Two introduces a standardized reporting mechanism known as the GloBE Information Return. This will require detailed information for calculating and allocating the top-up tax under the global minimum tax regime.

These reforms necessitate that Indian MNEs continuously reassess their global tax strategies considering potential increases in tax liabilities and compliance requirements in this evolving landscape.

3.2 Substance requirements

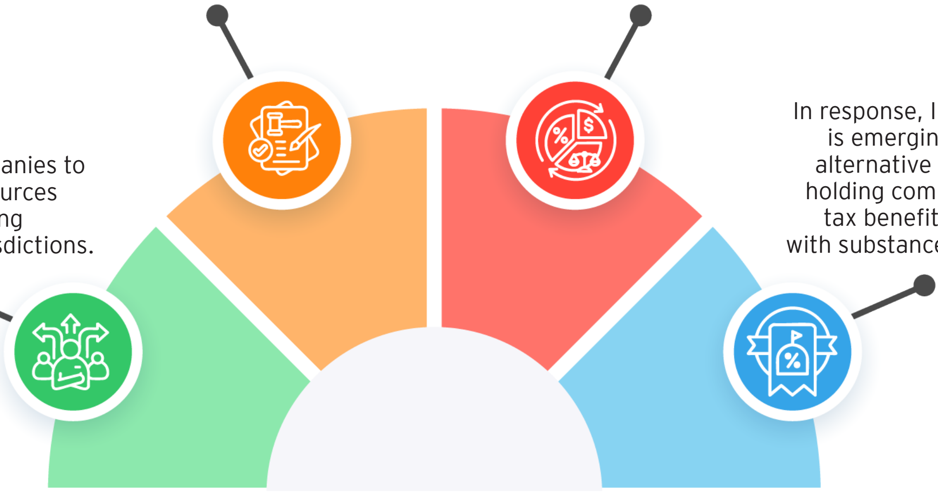
In international tax law, "substance" refers to the requirement for companies to have genuine economic activity in the jurisdictions where they claim tax benefits. The BEPS project emphasizes aligning taxation with actual economic substance. This affects outbound investment structures by:

Subjecting traditional holding jurisdictions like Mauritius, Singapore, and the Cyprus to increased scrutiny regarding the actual economic activities conducted there.

Parallelly, domestic tax laws are also increasingly emphasizing substance-related considerations. Evolving regulations and jurisprudence focus on the need to demonstrate commercial purpose and functional presence in cross-border structures. Under India's Place of Effective Management (POEM) regulations, foreign entities must demonstrate that strategic decisions, such as board meetings and key management activities, occur outside India. This drives Indian companies to structure outbound investments in jurisdictions with robust governance frameworks and local decision-making capabilities.

Requiring holding companies to maintain adequate resources and local decision-making capabilities in their jurisdictions.

In response, India's GIFT City is emerging as a potential alternative for establishing holding companies. It offers tax benefits while aligning with substance requirements.



1 Global Anti-Base Erosion

3.3 Regulatory landscape and environmental considerations

Global regulatory changes are influencing outbound investment strategies:

1

Environmental regulations:

The EU's Green Deal exemplifies stricter environmental standards, compelling companies to adopt sustainable practices to maintain market access.

2

Carbon Border Adjustment Mechanism (CBAM):

A significant development is the EU's Carbon Border Adjustment Mechanism (CBAM), which imposes a carbon price on imports of carbon-intensive goods such as cement, steel, aluminum, fertilizers, electricity and hydrogen. This mechanism, in its transitional phase since October 2023 and set to be fully effective in 2026, aims to equalize the cost of carbon between domestic products and imports, thereby preventing carbon leakage. Indian exporters in these sectors may face increased costs, potentially affecting their competitiveness in the EU market.

3

Data protection laws:

Regulations like the EU's General Data Protection Regulation (GDPR), Indian Digital Personal Data Protection Act, 2023 (DPDP) and various US state laws necessitate robust data protection measures from companies handling personal data.

4

Labor Laws:

Variations in labor regulations across regions require Indian investors to thoroughly understand and comply with local employment standards.

3.4 Bilateral APAs for transfer pricing certainty

As Indian multinational enterprises (MNEs) expand their outbound investments, the need for certainty in transfer pricing becomes paramount. Bilateral Advance Pricing Agreements (APAs) offer a strategic solution to address this concern. By entering APAs with tax authorities in other countries, Indian MNEs can establish clear guidelines for pricing intercompany transactions. This reduces the risk of disputes and double taxation. This proactive approach not only enhances compliance but also fosters a stable business environment for MNEs operating internationally.

The implementation of bilateral APAs aligns with the global trend towards greater transparency and cooperation among tax authorities. In the 2024-25 financial year, a total of 65 bilateral APAs (BAPAs) were signed by the Indian tax authority (source: Central Board of Direct Taxes (CBDT) data). This number marks the highest number of BAPAs finalized in any year so far. By seeking APAs, Indian companies can demonstrate their commitment to fair tax practices while ensuring that their pricing strategies are aligned with market conditions. This not only facilitates smoother operations in foreign jurisdictions but also strengthens the overall reputation of Indian businesses on the global stage. As MNEs navigate the complexities of international tax regulations, bilateral APAs emerge as a vital tool for securing the necessary certainty in transfer pricing matters, supporting their outbound investment strategies.

Conclusion

The strong surge in outbound direct investment (ODI) during FY2024-25 reflects growing global confidence in Indian enterprises and lays a robust foundation for future cross-border growth. As India's global investment landscape evolves, businesses must reimagine and realign their strategies to navigate shifting geopolitical dynamics and market realities.

In particular, the rapidly changing international tax and regulatory environment—including developments around the BEPS Pillar reforms, ESG-linked trade policies, new US tariff announcements, and evolving substance norms—calls for Indian multinational enterprises (MNEs) to proactively reassess their global playbooks. To remain future-ready and competitive, the following strategic responses merit consideration:

1. **Reassessing existing operating and investment models:**
   Indian MNEs should evaluate the long-term sustainability of their existing operating frameworks, holding structures, and outbound investment models. They must ensure alignment with emerging global standards and heightened tax transparency requirements.

2. **Reconsidering existing supply-chain structures:**
   In light of recent developments such as the India-UK FTA and revised US tariffs, businesses may benefit from a fresh review of their supply chains. This review should factor in the impact of indirect taxes, available fiscal incentives, and opportunities to enhance cost efficiency.

3. **Evaluating international structures:**
   Companies should consider restructuring their overseas entities and functions to align with substance requirements and demonstrate genuine economic activity in tax-favorable jurisdictions, optimizing exposure to regulatory scrutiny.

4. **Investing in carbon reduction:**
   To comply with mechanisms like the CBAM, firms in impacted industries are seeking to adopt carbon reduction strategies. This includes investing in cleaner technologies and energy efficiency to mitigate potential cost increases and maintain competitiveness.

5. **Diversifying export markets:**
   To reduce dependency on markets with stringent environmental regulations, companies are exploring opportunities in regions with more favorable trade terms.

6. **Considering GIFT City:**
   As part of strategic restructuring, Indian MNEs are evaluating the advantages of establishing holding companies and treasury centers in GIFT City, leveraging its tax benefits and alignment with global substance requirements.

7. **Review of existing structure:**
   Forward-thinking MNEs are adopting a disciplined approach to periodically review their global investment and operational structures, ensuring alignment with evolving market conditions, regulatory shifts and commercial objectives.

These strategic initiatives are critical for Indian MNEs to successfully navigate a complex and evolving international environment. By embracing a proactive, adaptive mindset, Indian enterprises can strengthen resilience, ensure compliance, and secure long-term global competitiveness in the face of continued global change.

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