

International Tax Update

**India signs amended
DTAA with Belgium
to curb tax evasion**



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The Ministry of Finance (Department of Revenue) has issued Notification No. 160/2025 [F. No. 505/2/1989-FTD-I], dated 10th November 2025, published in the *Gazette of India (Extraordinary)*, Part II – Section 3(ii).

As per the Notification, Belgium has agreed to share past offshore and financial data with India in criminal tax matters following the entry into force of the Amending Protocol to the India–Belgium Double Taxation Avoidance Agreement (DTAA).

The revised treaty introduces a comprehensive framework under Article 26 (Exchange of Information), enabling the competent authorities of both countries to exchange information that is foreseeably relevant for the administration or enforcement of domestic tax laws. This includes information relating to all taxes of every kind and

description, irrespective of whether such data pertains to past or future periods.

Significantly, the amendment removes previous limitations that restricted access to information held by banks, financial institutions, fiduciaries, agents, or nominees. It expressly provides that a Contracting State cannot decline to supply information solely because it has no domestic interest in such information.

The new framework ensures that both countries can exchange information relevant to assessment, collection, enforcement, prosecution, and appeal proceedings in respect of taxes. It also clarifies that “criminal tax matters” include tax issues involving intentional conduct liable to prosecution under the criminal or tax laws of the applicant State—whether arising before or after the entry into force of the Protocol.

For more information, please refer to the link given below:

<https://incometaxindia.gov.in/communications/notification/notification-160-2025.pdf>

DISCLAIMER: -

The summary information herein is based on Notification No. 160/2025/F. No. 505/2/1989-FTD-IJ issued by Ministry of Finance (Department of Revenue) on 10.11.2025. While the information is believed to be accurate, we make no representations or warranties, express or implied, as to the accuracy or completeness of it. Readers should conduct and rely upon their own examination and analysis and are advised to seek their own professional advice. This note is not an offer, advice or solicitation. We accept no responsibility for any errors it may contain, whether caused by negligence or otherwise or for any loss, howsoever caused or sustained, by the person who relies upon it.