



**INDIA JURIS**  
International Law Firm

# **Global Regional Corporate Treasury Centre IFSC, GIFT CITY**



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# Foreword

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It is with great pride that I present this publication titled “Global Regional Corporate Treasury Centre: IFSC, GIFT CITY” This work offers a comprehensive and timely examination of India’s evolving position in the global financial ecosystem through the development of Gujarat International Finance Tec-City (GIFT City).

Conceived as a forward-looking policy initiative, GIFT City represents India’s strategic response to the long-standing migration of financial services to offshore jurisdictions. Over the years, it has steadily transformed into a dynamic International Financial Services Centre (IFSC), supported by world-class infrastructure and a progressive regulatory framework. The establishment of the International Financial Services Centres Authority (IFSCA) marks a significant milestone in this journey, bringing regulatory coherence, operational efficiency, and global alignment to financial activities within the IFSC.

This publication thoughtfully explores the 2025 GRCTC regulatory landscape, highlighting key developments that strengthen GIFT City’s position as a competitive and credible global treasury hub. The emphasis on expanded permissible activities, robust substance requirements, and alignment with international standards such as BEPS reflects India’s commitment to fostering transparency, compliance, and sustainable financial growth.



At India Juris, we recognize the transformative potential of GIFT City in redefining corporate treasury operations and attracting global capital. As regulatory frameworks continue to evolve, it is essential for stakeholders to understand both the opportunities and responsibilities that accompany this shift.

I commend the efforts of everyone involved in the preparation of this work and am confident that it will serve as a valuable resource for professionals, corporates, and policymakers navigating the evolving financial landscape.

Warm Regards,  
**Sameer Rastogi**  
Managing Partner  
India Juris



# **Introduction:** GIFT City and the IFSC Framework

## India's Purpose-Built Financial Centre

Gujarat International Finance Tec-City (GIFT City) is India's first and only operational International Financial Services Centre (IFSC). Located in Gandhinagar, Gujarat, it was conceived as a deliberate policy initiative to repatriate financial activity that had long migrated to offshore centres such as Singapore, Dubai, and Hong Kong. The project broke ground in 2008 and received its formal designation as an IFSC under the Special Economic Zones Act, 2005, positioning it as a jurisdiction that sits within India's sovereign territory but operates under a distinct, internationally calibrated regulatory and tax framework.

The city is designed as a fully integrated smart city, a mixed-use development combining office towers, residential zones, retail infrastructure, and institutional facilities within a single, planned environment. Its financial district already hosts hundreds of entities, banks, brokers, fund managers, insurance companies, and corporate treasury centres, and the infrastructure continues to expand. GIFT City's strategic location in western India places it within easy reach of major commercial hubs, including Ahmedabad, Mumbai, and Surat, while its dedicated metro connectivity and international-standard utilities make it operationally self-sufficient.

## Regulatory Architecture: The Role of IFSCA

The International Financial Services Centres Authority (IFSCA), established under the IFSCA Act, 2019, is the unified regulator for all financial products, services, and institutions within GIFT City's IFSC. Before IFSCA's creation, entities operating in the IFSC were subject to overlapping regulatory oversight from multiple bodies, RBI, SEBI, IRDAI, and PFRDA. The consolidation of this oversight into a single regulator eliminated significant compliance friction and gave GIFT City a regulatory

identity comparable to the Financial Services Authority model used in mature offshore centres.

IFSCA is empowered to regulate banking, capital markets, insurance, fund management, and financial services, and to frame rules, circulars, and guidelines applicable across all these activities. Its mandate is explicitly international in orientation: to develop a world-class financial centre that attracts global capital, talent, and institutions while maintaining standards consistent with OECD, FATF, and Basel norms. The 2025 updates to the GRCTC framework, expanding permissible activities, reinforcing substance requirements, and aligning with Base Erosion and Profit Shifting (BEPS), are a direct expression of this mandate.

## The IFSC Structural Advantage

The IFSC at GIFT City operates under a liberalised foreign currency framework, meaning that transactions within the IFSC are conducted in freely convertible foreign currencies rather than Indian Rupees, and are largely exempt from the capital account restrictions imposed by the Foreign Exchange Management Act (FEMA) on domestic Indian entities. This structural separation gives GIFT City its defining characteristic: it is simultaneously onshore (within India's legal and sovereign perimeter) and offshore (exempt from many of the exchange controls and domestic regulatory requirements that govern the Indian financial system). For corporates, this duality creates opportunities, particularly in treasury management, that no other Indian jurisdiction can replicate.



# The GRCTC Model: Purpose, Structure, and Strategic Value

## The Strategic Case for Treasury Centralisation

For any multinational group operating across multiple jurisdictions, the management of cash, currency risk, and financing costs is one of the most consequential operational decisions a CFO can make. Decentralised treasury, where each subsidiary manages its own liquidity, hedging, and banking relationships, is operationally simple but strategically costly. It leaves surplus cash trapped in subsidiaries that cannot deploy it, creates duplicated hedging positions that offset one another at a net cost, and denies the group the pricing power that comes with consolidated banking relationships. Corporate treasury centralisation addresses all these inefficiencies by bringing liquidity, risk management, and capital markets activity under a single roof, the in-house bank.

Global treasury hubs have become standard practice for large multinationals. Amsterdam, Singapore, Dublin, and Hong Kong have each built sophisticated ecosystems, combining favourable tax regimes, treaty networks, skilled talent pools, and deep banking infrastructure, to attract treasury centres from groups headquartered across Asia, Europe, and the Americas. GIFT City, through the GRCTC framework, positions India as a credible addition to this list, with the added distinction of providing direct, structured access to one of the world's fastest-growing major economies.

## Defining the GRCTC: Structure and Mandate

A Global/Regional Corporate Treasury Centre (GRCTC) is a licensed entity registered within GIFT City's IFSC under the IFSCA (Finance Company) Regulations, 2021. It is the IFSC equivalent of what treasury practitioners call an 'in-house bank', a centralised treasury vehicle through which a multinational group can pool liquidity, raise and deploy capital, manage financial risk, and provide

treasury services to its group entities from a single, tax-advantaged jurisdiction. GRCTC is not a bank; it does not take deposits from the public or extend credit to unrelated third parties. Its mandate is exclusively intra-group, and every entity it serves, referred to as a Service Recipient, must be a related group company.

The operative framework is [IFSCA Circular](#), issued on April 4, 2025, and updated on June 9, 2025. This circular superseded the inaugural 2021 GRCTC framework and is materially more comprehensive, expanding permissible activities to fourteen categories, reinforcing economic substance requirements, and aligning the regime with OECD BEPS and FATF standards. A GRCTC may be established as a Finance Company, a separately incorporated entity with its own balance sheet, or as a Finance Unit, a branch of an existing Indian or foreign entity. The minimum Owned Fund required is USD 0.2 million, to be maintained at all times.

## How GRCTC Operates

The GRCTC sits at the apex of the group's treasury structure, interfacing with subsidiaries across multiple jurisdictions on one side and with external banks, derivative counterparties, and capital markets on the other. In operational terms, it replicates the functions of a commercial bank, but exclusively for the benefit of related group entities. Subsidiaries direct their surplus cash to GRCTC through inter-company deposits or cash pooling arrangements; GRCTC consolidates these balances, invests them efficiently, and redeploys them as working capital loans or credit facilities to entities that need funding. Hedging requirements, currency forwards, interest rate swaps, commodity options, are aggregated at GRCTC level and executed with external counterparties at group-level pricing, typically at materially better rates than individual subsidiaries could achieve independently.

The master cash pool account must be held at an IFSC Banking Unit or IFSC Banking Company within GIFT City, ensuring that the primary liquidity management function is anchored in the jurisdiction. From this hub, the GRCTC may also execute exchange-traded derivatives on NSE IX and India INX, engage in factoring and forfaiting of group receivables, and interpose itself as a re-invoicing centre for group trade flows, provided it never takes physical possession of goods. A Board-approved derivatives policy must govern all hedging activity, and three mandatory policies, on corporate governance, risk management, and permissible activities, must be in place before operations commence.

## The Commercial Rationale : Four Structural Inefficiencies Addressed

The case for GRCTC rests on four structural inefficiencies that it directly addresses. First, trapped liquidity: subsidiaries in cash-rich jurisdictions often cannot efficiently transfer surplus funds to cash-poor affiliates without triggering withholding taxes, regulatory approvals, or repatriation delays. Cash pooling through a GRCTC eliminates most of these frictions. Second, hedging duplication: when subsidiaries hedge independently, offsetting positions are common; a subsidiary in one country buys EUR while another sells EUR, and both pay transaction costs. Centralising hedging at the GRCTC net-settles these positions before execution, reducing cost and counterparty exposure. Third, financing cost disparity: smaller subsidiaries borrow from local banks at rates reflecting their standalone credit quality; the GRCTC can borrow at group level and on-lend at more favourable rates. Fourth, regulatory arbitrage risk: routing treasury flows through traditional offshore centres, British Virgin Islands, Cayman Islands, Mauritius, attracts increasing scrutiny from tax

authorities and is inconsistent with BEPS substance requirements. GRCTC provides the same efficiencies within a jurisdiction that meets international governance standards

## Key Advantages of the GRCTC Framework

The GRCTC regime offers a distinctive combination of advantages unavailable through most alternative treasury jurisdictions. On the tax side, entities operating within GIFT City's IFSC enjoy a 100% profit deduction for twenty consecutive years out of the first twenty-five years of operation. Crucially, the 2025 Framework's substance requirements, mandatory staffing, physical office presence, and board-governed policies, ensure that these benefits are defensible under OECD BEPS Action Plans, unlike the low-substance offshore structures that tax authorities across the G20 have systematically dismantled over the past decade.

Operationally, GRCTC's authority to execute OTC derivatives with counterparties both inside and outside the IFSC, combined with access to exchange-traded products on IFSC exchanges, provides unmatched flexibility for a group's hedging programme. The ability to raise equity, borrow in any currency, extend guarantees and performance bonds, and invest in financial instruments issued globally makes GRCTC a fully-functional capital markets platform, not merely a cash manager. The additional permissions for advisory services, across financial management, risk management, and capital markets, allow the treasury centre to function as the group's internal centre of expertise, reducing reliance on external advisers.

## Who Can Establish GRCTC?

The GRCTC is available to any multinational corporate group, Indian or foreign, that has related entities on whose behalf treasury services will be provided. Indian multinationals with global operations can use a GRCTC to centralise their offshore treasury activity within India's regulatory perimeter, achieving the efficiency of an offshore hub without the reputational and substance risks. Foreign multinationals with subsidiaries, joint ventures, or significant supply chain relationships in India can leverage the GRCTC as their primary interface with the Indian financial ecosystem,

managing INR exposures, extending inter-company credit to Indian affiliates, and accessing Indian capital markets within a FEMA-compliant framework. Mid-sized regional groups across South Asia, Southeast Asia, and the GCC, for whom a Singapore or Amsterdam treasury hub is operationally disproportionate, represent a particularly natural fit.



A close-up photograph of a person's hands in a dark suit jacket writing on a white document with a gold and black fountain pen. The background is blurred, showing more of the person's suit and a white shirt. The lighting is dramatic, highlighting the hands and the pen.

## **Establishing a GRCTC:** Eligibility, Requirements and Registration

Establishing a GRCTC in GIFT City is open to both Indian and foreign corporate groups, subject to eligibility conditions and a structured registration process administered by IFSCA. The requirements are designed to ensure that only genuine, well-governed treasury operations are admitted, and that the entities that do establish themselves in GIFT City have the substance, intent, and organisational capacity to sustain active operations.

## Baseline Eligibility Conditions

Regardless of whether the applicant is an Indian group or a foreign multinational, the following baseline conditions apply. The applicant's parent entity must not be incorporated into or resident of a jurisdiction on the FATF blacklist of high-risk countries subject to a call for action. All Key Managerial Personnel, including directors, the Head of Treasury, and the Compliance Officer, and all persons exercising control must satisfy the Fit and Proper criteria prescribed in Annex I of the Framework. These criteria cover financial integrity (no wilful defaults or insolvency proceedings), legal soundness (no criminal convictions for economic offences or fraud), and regulatory standing (no debarment orders from any financial regulator in any jurisdiction). Declarations of fit and proper status must be filed with IFSCA, with undertakings to report any material change.

The entity must register under the IFSCA (Finance Company) Regulations, 2021, either as a Finance Company or a Finance Unit, and must concurrently obtain a valid Letter of Approval under the Special Economic Zones Act, 2005. A minimum Owned Fund of USD 0.2 million, defined as paid-up capital plus free reserves and share premium, net of accumulated losses, must be maintained at all times. For Finance Units, this may be held at the parent level. All applications are submitted through IFSCA's Single Window IT System (SWIT) at <https://swit.ifsca.gov.in/>, and must include an identified list of proposed Service Recipients.

## Registration Process and Fee Structure

On prima facie satisfaction of entry conditions, IFSCA may issue a Provisional Registration, which is not a guarantee of final approval but permits the applicant to advance with hiring, infrastructure buildout, and systems integration in parallel. The final Certificate of Registration is granted on full payment of fees and compliance with all conditions. Business may only commence after the Certificate is received. Once registered, GRCTC must commence operations within six months, extendable by three months at the Authority's discretion.

The fee structure prescribed by the Framework is as follows:

Fee Type	Amount (USD)	Nature
Application Fee	USD 1,000	One-time
Registration Fee	USD 12,500	One-time
Recurring Fee	USD 25,000	Per annum

Entities registered as both a GRCTC and a Factor under the IFSCA (Registration of Factors) Regulations, 2024 incur no incremental registration or annual fee for the Factoring activity, a meaningful concession for groups intending to use the GRCTC for receivables management.

## Indian Multinational Groups

Indian multinational groups, including conglomerates with global manufacturing, technology, pharmaceutical, or services operations, can establish a GRCTC as a Finance Company or Finance Unit within GIFT City. The GRCTC provides these groups with a compliant vehicle to manage their offshore treasury operations from within India's regulatory perimeter, eliminating the need to route group treasury flows through Mauritius, Singapore, or the Netherlands purely for tax and regulatory efficiency reasons. This is particularly significant in the context of India's evolving approach to controlled foreign corporation rules and transfer pricing, a GIFT City GRCTC, with its verifiable substance and IFSCA oversight, presents a materially more defensible structure than a Mauritius holding or treasury vehicle.

For Indian groups, the GRCTC also enables access to global capital markets from within the IFSC, issuing foreign currency bonds, borrowing from international banks, and managing group-wide FX exposure through a single regulated entity. The onshore-offshore liquidity pool is particularly valuable: Indian parent companies can receive dividend and interest flows from the GRCTC in a structurally efficient manner, while keeping overseas subsidiaries funded through inter-company lending at arms-length pricing that can withstand transfer pricing scrutiny. Groups such as Tata, Infosys, Reliance, and Wipro, each with extensive cross-border treasury requirements, represent the archetype of Indian corporates for whom a GIFT City GRCTC would deliver material operational and cost benefits.

## Foreign Multinational Companies

Foreign multinationals that have established or are scaling operations in India face a structural challenge that is unique to the Indian market: FEMA's capital account restrictions impose significant friction on direct cross-border financial flows between a foreign parent and its Indian subsidiary. Extending inter-company loans, charging management fees, or transferring excess cash out of India all require regulatory navigation that increases cost, delay, and compliance burden. A GRCTC in GIFT City addresses this directly by creating a supervised, FEMA-compliant interface between the foreign group's treasury and its Indian operations, one that IFSCA and RBI recognise as a legitimate and structured channel for intra-group financial flows.

Foreign groups establishing a GRCTC do so as a Finance Unit, a branch of the foreign parent or an intermediate holding entity, which allows the Owned Fund requirement to be satisfied at the parent level without the need to capitalise a new standalone entity in India. The GRCTC can then extend loans to Indian group entities, issue performance bonds on their behalf, manage their FX exposure through derivative instruments, and receive service fee income from the Indian subsidiary, all within a framework that is transparent to the regulator and defensible under transfer pricing rules. For large multinationals in sectors such as automotive, consumer goods, chemicals, and technology, where India represents both a major manufacturing base and a rapidly growing consumer market, the GRCTC provides the treasury infrastructure that their India operations have long lacked.

## Economic Substance and Operational Requirements

Economic Substance and Operational Requirements  
Regardless of entity type or nationality, all GRCTCs must demonstrate genuine economic substance in GIFT City before commencing operations. The Framework requires at least five qualified personnel physically based in GIFT City, including a designated Head of Treasury and a Compliance Officer. The 2025 update introduces a practical concession: the IFSCA Chairperson may grant a relaxation from this five-person requirement for up to one year from commencement, assessed case-by-case against the proposed activity scope and anticipated transaction volumes. This is particularly relevant for entities establishing in phases or with initially limited transaction volumes.

Beyond staffing, adequate office space, communication infrastructure, and IT systems are required. Best practice, and increasingly, the expectation of sophisticated counterparties and auditors, involves integration with a recognised Treasury Management System (TMS) and Enterprise Resource Planning (ERP) platform. The substance requirement is not merely procedural: in a post-BEPS environment, it is the condition precedent for the tax benefits that make GRCTC commercially attractive. Without demonstrable substance, transfer pricing arrangements and interest deductions claimed at GRCTC level become vulnerable to challenge by home-country tax authorities, potentially unwinding the principal commercial rationale for the structure.





**Corporate Treasury Hubs:**  
Global Precedents and  
India's Emergence

The corporate treasury centre model has a well-documented history. Over the past three decades, the world's largest multinationals have systematically consolidated their treasury operations into purpose-built financial hubs, drawn by favourable tax regimes, deep derivatives markets, and large pools of finance talent. Understanding how those hubs were built, and who built them, provides the clearest possible lens through which to evaluate GIFT City's ambition and its current state of development.

## **Established Treasury Hubs: Three Case Studies**

### **The Netherlands - Europe's Treasury Capital**

The Netherlands became Europe's dominant treasury jurisdiction through its unmatched tax treaty network, a participation exemption that shelters inter-company dividends and capital gains from Dutch corporate tax, and a regulatory culture that actively welcomed treasury and finance companies. Shell established its global treasury operations in the Netherlands as a centre of gravity, with Shell Treasury Centre East Pte Ltd (Singapore) managing Asia-Pacific flows, a structure that influenced the industry for decades. Philips centralised its group treasury in Amsterdam, managing multi-currency cash pooling and interest rate risk across its global operations from a single Netherlands-based entity. IKEA's treasury and inter-company financing operations were similarly structured through Dutch vehicles. At its peak, the Netherlands hosted multiple special purpose and holding entities with treasury functions at their core. The model came under sustained pressure following OECD BEPS Actions 4 and 6, which targeted thin capitalisation and treaty shopping, forcing a gradual shift towards

entities with demonstrable local substance, a transition that informs GIFT City's substance-first design.

### **Singapore - The Asia-Pacific Benchmark**

Singapore's rise as Asia's premier treasury hub was engineered through the Monetary Authority of Singapore's Finance and Treasury Centre (FTC) incentive scheme, offering approved entities a concessional corporate tax rate on qualifying treasury income. Procter & Gamble established its Asia-Pacific treasury centre in Singapore to manage multi-currency cash pooling and FX hedging across its APAC subsidiaries. ExxonMobil operates significant financing and treasury operations from Singapore, managing commodity-linked financial risk and inter-company financing across the region's refining and chemicals operations. Hewlett-Packard has Asia-Pacific treasury, receivables management, and supply chain financing in Singapore, leveraging the FTC framework and proximity to its manufacturing operations in Malaysia and China. Shell's Asia-Pacific treasury centre, Shell Treasury Centre East Pte Ltd, manages liquidity, FX, and funding for Shell's entire APAC business portfolio from Singapore, with a dedicated team of treasury professionals covering markets from Japan to Australia. Singapore is today the third-largest FX trading centre globally after London and New York, a liquidity depth that makes it indispensable for large treasury operations and a standard against which GIFT City's ambitions must ultimately be measured.

### **Dublin - The EMEA Platform for US Multinationals**

Ireland attracted the EMEA regional treasury of US multinationals, drawn by its low corporate tax rate and EU membership, which granted access to the EU Parent-Subsidiary Directive and European capital

markets. Google Ireland Holdings managed significant portions of the group's non-US treasury and royalty income from Dublin before restructuring under BEPS pressure. Ireland has updated its transfer pricing and substance rules in line with BEPS but remains one of the most active treasury jurisdictions in Europe for US-headquartered groups.

## Financial Treasury Centres in Practice: Global Corporate Examples

The benefits of centralised treasury are not theoretical. Several of the world's largest multinationals have built in-house banking structures that deliver recurring, measurable gains across liquidity management, funding efficiency, and risk control. The following examples illustrate what those structures look like in practice, and, by extension, the value that the GRCTC framework at GIFT City is designed to replicate.

Unilever operates its treasury through internal finance companies that function as an in-house bank, managing group liquidity, intra-group loans, capital markets funding, and hedging on a consolidated basis. According to the Unilever Annual Report 2024, the company held approximately €6.1 billion in cash and cash equivalents at year-end, with an estimated €0.6–0.9 billion maintained within central treasury entities, reflecting active cash pooling across jurisdictions. Total financial liabilities stood at approximately €31.7 billion as at mid-2024, a funding base raised centrally and on-lent to subsidiaries at more favourable terms than those entities could access independently. The treasury also manages FX exposures in the range of €5–7 billion, benefiting from netting and aggregation efficiencies unavailable to subsidiaries hedging in isolation.

Shell PLC operates one of the most sophisticated managing group-wide liquidity, funding, and financial

risk across more than 70 countries. According to Shell's Full Year 2024 Results, the company held approximately \$39.1 billion in cash and cash equivalents as of 31 December 2024, centrally deployed across subsidiaries, against total debt of approximately \$77.1 billion raised at group level. Shell's Asia-Pacific treasury is managed through a dedicated entity, Shell Treasury Centre East Pte Ltd in Singapore, which handles liquidity, FX, and funding for the group's entire APAC portfolio, a structural model directly analogous to what the GRCTC framework enables at GIFT City.

Siemens AG manages its treasury through Siemens Treasury GmbH and Siemens Financial Services (SFS), which together act as the group's in-house bank. The structure aggregates subsidiary cash balances through global cash pooling, raises debt centrally, and distributes funding internally, reducing reliance on external borrowing at subsidiary level and enabling centralised hedging of FX and interest rate exposures. The Siemens Annual Financial Report for fiscal year 2024 (year ended 30 September 2024) reported net income of €9.0 billion and free cash flow of €9.5 billion, reflecting the scale of the financial flows that the treasury infrastructure supports.

Procter & Gamble illustrates the multi-hub model adopted by global consumer goods groups. According to P&G's Annual Report for fiscal year 2025 (year ended 30 June 2025), the company generated operating cash flows of \$17.8 billion, with an adjusted free cash flow productivity ratio of 87%. Its Asia-Pacific treasury centre in Singapore operates under the MAS Finance and Treasury Centre (FTC) scheme, which offers a concessional corporate tax rate of 8% on qualifying treasury income, and serves as the regional hub for cash pooling, FX management, and intercompany funding across APAC subsidiaries, demonstrating the tax and operational efficiencies that a well-structured regional treasury centre can generate.

Caterpillar demonstrates that a treasury centre can serve as both a cost centre and a direct revenue contributor. Caterpillar Financial Products Corporation (Cat Financial) provides equipment financing to dealers and customers, generating revenues of \$3.25 billion in fiscal year 2023 and \$3.49 billion in 2024, against a finance receivables portfolio of approximately \$28 billion at year-end 2023, all within a group reporting total revenues of \$67.1 billion in 2023.[1] The treasury function provides the capital markets access, intercompany borrowing, and liquidity infrastructure that enables Cat Financial to operate at scale, illustrating how the GRCTC's intra-group lending and working capital financing permissions can support an integrated financing business.

GE's regional treasury centre in Singapore, established in 2018, shows what a purpose-built APAC hub looks like in operation: aggregating subsidiary cash balances, enabling multi-currency pooling, managing intercompany funding and FX risk, and deploying real-time cash visibility tools to support faster decision-making. Singapore's role as a host jurisdiction is integral to the model, the MAS FTC scheme offers a concessional 8% tax rate on qualifying income, capital controls are absent, and the city-state ranks as the world's third-largest FX trading centre, with daily volumes reaching approximately \$1.5 trillion in April 2025 (BIS data), providing the liquidity depth essential for large-scale currency risk management.

Across these examples, three themes recur. Centralised treasury delivers compounding benefits, liquidity, funding, and risk management gains reinforce one another, and the aggregate is greater than the sum of its parts. The benefits are recurring, not one-time, once integrated with subsidiary banking relationships and ERP systems, the efficiency gains are structural. And the host jurisdiction matters, tax treatment, regulatory

stability, market depth, and banking infrastructure directly determine how much of the theoretical benefit a treasury centre can realise in practice. These are precisely the conditions that Singapore, Amsterdam, and Dublin have developed over decades, and that GIFT City, through the GRCTC framework, is now building

## Corporate Treasury in India: Closing the Pre-GIFT City Gap

Before GIFT City, India offered no domestic mechanism for hosting a centralised corporate treasury centre. Indian multinationals with global treasury requirements routed their offshore treasury operations through Mauritius, Singapore, or the Netherlands, not because those jurisdictions offered superior operational infrastructure, but because India's regulatory framework provided no comparable vehicle. FEMA's capital account restrictions, the RBI's limits on offshore borrowing and currency derivatives, and the shallow depth of India's onshore OTC market collectively made it structurally impossible to run a global in-house bank from within Indian territory. The result was a persistent leakage of sophisticated financial activity, along with the employment, tax revenue, and institutional relationships that accompany it, to foreign jurisdictions. This is precisely the dynamic that GIFT City's GRCTC framework was designed to reverse.

## Early Registrants: GIFT City's GRCTC Ecosystem Takes Shape

As of the date of this publication, the IFSCA's entity directory confirms that eight entities have been registered as Global/Regional Corporate Treasury Centres at GIFT City's IFSC. The registrants span India's major public sector energy companies and a growing cohort of private sector groups:

IOC Global Capital Management IFSC Ltd (IGCMIL), established by Indian Oil Corporation in May 2023 as the first finance company set up at GIFT City IFSC by any commercial non-financial corporation in India; OVL Overseas IFSC Limited (OOIL), the overseas treasury arm of ONGC Videsh; GAIL Global IFSC Limited, incorporated by GAIL (India) Limited in April 2025; AMNS Global Treasury Centre IFSC Private Limited, established by the ArcelorMittal Nippon Steel joint venture and the first private sector GRCTC at GIFT City; ATSOL Global IFSC Limited, incorporated by Adani Energy Solutions in December 2025; ReNew Treasury IFSC Private Limited; Welspun Global IFSC Limited, established by Welspun Corp Limited; and Amefird Treasury IFSC Private Limited. Taken together, these registrants provide the clearest available evidence that the GRCTC framework has moved from regulatory concept to operational reality.

## What the Early Registrations Reveal

The composition of the eight registered GRCTCs is instructive. The early movers are dominated by India's major public sector energy companies, IndianOil, ONGC Videsh, and GAIL, reflecting the urgency of the GRCTC model for groups with significant multi-currency borrowing requirements, commodity price exposure, and overseas subsidiaries that need structured funding channels. The transactions executed by these entities confirm that the framework is not merely theoretical: IGCMIL executed over USD 500 million in transactions within its first year and OOIL raised a USD 500 million foreign currency term loan from Bank of Baroda within two years of incorporation. The private sector is following closely: AMNS's entry as the first private GRCTC in 2024 has been followed by Welspun Corp (manufacturing/infrastructure), ReNew Energy (renewables), and the Adani Group (diversified conglomerate), a broadening of the sectoral base that mirrors the pattern seen in

Singapore's FTC ecosystem as it matured from an energy-dominated cluster to a multi-sector treasury hub.

## The Growth Trajectory: From Proof-of-Concept to Scale

The GIFT City GRCTC ecosystem is at an inflection point. The 2021 framework created legal architecture; the 2024 consultation process gathered the market feedback that identified its shortcomings; and the absence of a staffing concession for phased entry, and the lack of clarity on certain derivative permissions.

The parallels with Singapore's FTC ecosystem in the early 2000s are instructive, but GIFT City's trajectory is arguably steeper. Singapore spent roughly a decade building the banking infrastructure, talent pool, and institutional relationships that made its treasury hub viable at scale; GIFT City benefits from 20 years of that blueprint, a domestic economy that is growing generates its own treasury demand, and a regulatory authority, IFSCA, that has demonstrated an unusually consultative and responsive approach to framework development. The transaction volumes already being recorded by early GRCTC registrants suggest that the ecosystem has moved past proof-of-concept. The question now is velocity: how quickly will the second and third waves of registrants follow the trailblazers that IndianOil, ONGC Videsh, and AMNS have been.



The GIFT City GRCTC framework arrives at a moment of genuine strategic opportunity, for India as a financial centre, and for the multinationals that move quickly enough to capitalise on it. The 2025 update to the framework is not a minor regulatory revision; it is the result of a deliberate effort to close the gap between what GIFT City offers on paper and what sophisticated treasury practitioners require in practice. Expanded activity permissions, verifiable economic substance requirements, BEPS and FATF alignment, and a unified regulatory authority have transformed the GRCTC from a promising concept into a commercially deployable structure.

For Indian multinationals, the strategic calculus is straightforward. The era of routing treasury operations through low-substance offshore vehicles, Mauritius, British Virgin Islands, Cayman, is drawing to a close, accelerated by India's own evolving general anti-avoidance rules and the global implementation of BEPS. A GIFT City GRCTC offers the same functional efficiency as a Singapore or Amsterdam treasury centre, within a jurisdiction that is simultaneously onshore for Indian regulatory purposes and offshore for foreign currency and capital account purposes. It is, in structural terms, the most India-aligned treasury solution available, and it now meets international standards of governance and substance.

For foreign multinationals with India operations, the GRCTC resolves a friction point that has long complicated their India treasury strategy: the absence of a structured, supervised channel for intra-group financial flows that satisfies both FEMA requirements and home-country transfer pricing norms. The GRCTC provides this channel, with IFSCA's regulatory imprimatur providing the institutional credibility that tax authorities and auditors require. The fee structure is modest relative to the operational savings available, the activity

scope is broad, and the regulatory framework is designed to evolve alongside the ambitions of the entities it governs

The global precedents, Amsterdam, Singapore, Dublin, each took a decade or more to reach their full potential as treasury hubs. GIFT City will not be different. But the regulatory architecture is now in place, the institutional infrastructure is developing, and the macroeconomic context, India's sustained growth, its deepening capital markets, and its growing weight in global supply chains, provides the demand-side fundamentals that no amount of regulatory design can substitute. The question for treasury executives is not whether GIFT City will emerge as a significant treasury hub. The question is whether their group will be among those that helped build it.

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## Our Offices

- 📍 **New Delhi**  
Lajpat Nagar-1 New Delhi  
[newdelhi@indiajuris.com](mailto:newdelhi@indiajuris.com)
- 📍 **Gurugram**  
Sohna Road, Gurugram  
[gurugram@indiajuris.com](mailto:gurugram@indiajuris.com)
- 📍 **Bengaluru**  
Indira Nagar, Bengaluru  
[bengaluru@indiajuris.com](mailto:bengaluru@indiajuris.com)
- 📍 **Mumbai**  
Andheri East, Mumbai  
[mumbai@indiajuris.com](mailto:mumbai@indiajuris.com)
- 📍 **GIFT CITY, Gujarat**  
Processing Area GIFT SEZ, GIFT CITY  
[giftcity@indiajuris.com](mailto:giftcity@indiajuris.com)

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