

# INDIRECT TAX DIGEST

19 July 2024 <u>www.bdo.in</u>

> GOODS & SERVICES TAX



## LEGISLATIVE UPDATES

### NOTIFICATION

GSTN Update <sup>1</sup>	Based on the analysis of tickets and user feedback, Goods and Services Tax Network (GSTN) has implemented system enhancements to the address-related fields in GST registration functionalities, viz. New Registration, Amendment Application (Core and Non-Core) and Geocoding Business Addresses.
GSTN Update <sup>2</sup>	GSTN has increased the size of documents that can be uploaded as proof of Principal Place of Business and Additional Place of Business from 100 KB to 500 KB.
GSTN Update <sup>3</sup>	GSTN is in the process of developing a separate category of refund application in Form GST RFD-01 in respect of additional IGST paid on account of upward revision in the price of goods after its exports. Pending such development, the exporter may claim refund of additional IGST by filing a refund application in Form GST RFD-01 under " <i>Any other</i> " category with remarks " <i>Refund of additional IGST paid on account of increase in price subsequent to export of goods</i> ".
GSTN Update <sup>4</sup>	NIC is releasing the integrated services from e-invoice-1 and e-invoice-2 portals on 18 July 2024 on sandbox portals and on the production portals on 1 August 2024.
12 to 15/2024- Central Tax, 01/2024 - Integrated Tax, 01/2024 - Union Territory Tax and Circular Nos. 223/17/2024- GST to 227/21/2024- GST <sup>5</sup>	The 53rd GST Council meeting was scheduled on 22 June 2024 in New Delhi <sup>6</sup> . The GST Council in this meeting had approved various clarifications to be issued. In furtherance to these recommendations, the Central Board of Indirect Taxes and Customs (CBIC) had issued Circular nos. 207/1/2024 to 222/16/2024, all dated 26 June 2024 <sup>7</sup> . Pursuant to the above, CBIC has issued additional notifications and Circulars implementing the recommendations made by the 53rd GST Council meeting <sup>8</sup> .

<sup>1</sup> Dated 4 July 2024 <sup>2</sup> Dated 9 July 2024 <sup>3</sup> Dated 14 July 2024

	Further to the recommendations made by the GST Council in its 53rd meeting, GST rates on various goods have been inter alia amended as follows:							
02/2024- Central Tax	<ul> <li>Following goods to attract 12% GST:</li> </ul>							
	- Cartons, boxes and cases of:							
	Corrugated paper or paper board; or							
	Non-corrugated paper or paper board.							
(Rate),	• (HSN 4819 10 or 4819 20)							
02/2024-	- Milk cans made of Iron, Steel, or Aluminium (HSN 7310, 7323, 7612 or 7615)							
Integrated Tax (Rate) and	- Solar cookers (HSN 7321 or 8516)							
02/2024-Union Territory Tax	<ul> <li>All goods falling under HSN 4819 except cartons, boxes and cases of corrugated/ non-corrugated paper or paper board (as mentioned above) will attract GST at the rate of 18%.</li> </ul>							
(Rate) <sup>9</sup>	A proviso in Explanation to these notifications is inserted to provide that notwithstanding anything contained in the Legal Metrology Act, 2009 and the rules made thereunder, supply of agricultural farm produce in package(s) of commodities containing quantity of more than 25 kilogram or 25 litre shall not be considered as a supply made within the scope of the expression 'pre-packaged and labelled'. Similar amendments have been made to the notifications providing exemption on various goods vide Notification Nos. 03/2024-Central Tax (Rate), 03/2024-Integrated Tax (Rate) and 03/2024-Union Territory Tax (Rate) dated 12 July 2024.							
04/2024-	Effective 15 July 2024, the notifications exempting various services from the levy of GST are amended to <i>inter alia</i> provide exemption on the following services:							
Central Tax (Rate), 04/2024-	<ul> <li>Services provided by the Ministry of Railways (MoR) to individuals by way of sale of platform tickets facility of retiring rooms/ waiting rooms, cloak room services and battery-operated car services.</li> </ul>							
Central Tax	<ul> <li>Services provided by one zone/ division of MoR to another zone/ division of MoR.</li> </ul>							
(Rate) and 04/2024-Union Territory Tax	<ul> <li>Services provided by Special Purpose Vehicles (SPVs) to MoR by way of allowing MoR to use the infrastructure built and owned by such SPVs during the concession period and maintenance services supplied by MoR to SPVs in relation to such infrastructure during such period.</li> </ul>							
(Rate) <sup>10</sup>	<ul> <li>Accommodation services having a value of supply less than or equal to INR 20,000 per person per month, provided that such services are supplied for a minimum continuous period of 90 days.</li> </ul>							
01/2024- Compensation Cess (Rate) <sup>11</sup>	Effective 15 July 2024, goods falling under HSN 2202 supplied by a Unit Run Canteen (URC) to authori customers are exempted from the levy of Goods and Services Tax Compensation Cess (Cess).							
CIRCULAR								
	Pursuant to the recommendations of the 53rd GST Council Meeting held on 22 June 2024, CBIC has issued clarifications on taxability of the following services:							
Circular No. 228/22/2024- GST <sup>12</sup>	<ul> <li>Specified services provided by MoR to individuals (as mentioned above) are exempted vide Notification No. 04/2024-Central Tax (Rate). GST liability for the past period, i.e., from 20 October 2023 to 14 July 2024 is regularised on 'as is where is' basis.</li> </ul>							
	• Specified services provided by SPV to MoR and <i>vice versa</i> are exempted vide Notification No. 04/2024-Central Tax (Rate). GST liability for the past period, i.e., from 1 July 2017 to 14 July 2024 is regularised on 'as is where is' basis.							
	<ul> <li>Statutory collections by Real Estate Regulatory Authority are covered under SI. No. 4 of Notification No. 12/2017-Central Tax (Rate) and hence, exempted.</li> </ul>							
	<ul> <li>Incentive amount shared by acquiring bank with other stakeholders up to the point where the incentive is distributed in the proportion and manner decided by National Payments Corporation of India under the notified Incentive scheme (for promotion of RuPay Debit Cards and low-value BHIM- UPI transactions), is subsidy and hence, not taxable.</li> </ul>							
	• GST liability on services by way of reinsurance of the specified insurance schemes for the past							
	period, i.e., from 1 July 2017 to 24 January 2018 is regularised on 'as is where is' basis.							

	<ul> <li>The term 're-insurance' mentioned in SI. No. 36A of Notification No. 12/2017-Central Tax (Rate) includes 'retrocession' services.</li> <li>GST liability on supply of accommodation services where value of supply does not exceed INR 20,000 per person per month for the past period is regularised from 1 July 2017 to 14 July 2024, subject to the condition that the said service was supplied for a minimum continuous period of 90 days.</li> </ul>
Circular No. 229/23/2024- GST <sup>13</sup>	<ul> <li>Pursuant to the recommendations of the 53rd GST Council Meeting held on 22 June 2024, CBIC has issued clarifications on taxability of the following goods:</li> <li>Solar cookers that work on dual energy of solar energy and grid electricity are classifiable under the heading 8516 attracting GST at the rate of 12%.</li> <li>GST liability on all types of sprinklers, including fire water sprinklers (being taxable @ 12%) for the past period is regularised on 'as is where is' basis.</li> <li>GST liability on parts of poultry keeping machinery (HSN 8436 9100), being taxable @ 12% for the past period is regularised on 'as is where is' basis.</li> <li>Supply of agricultural farm produce in package(s) containing a quantity of more than 25 kilogram or 25 litre will not attract GST @ 5%. The issues pertaining to the past period is regularised on 'as is where is' basis.</li> <li>GST liability on supply of pulses and cereals made to or by a specified agency engaged by the Government for the past period i.e., from 1 July 2017 to 17 July 2022 is regularised on 'as is where is' basis, subject to certain conditions and restrictions.</li> </ul>

## JUDICIAL UPDATES

#### Issuance of Form GST ASMT-10 is not a mandatory pre-requisite for adjudication

# Mandarina Apartment Owners Welfare Association Vs. Commercial Tax Officer/State Tax Officer [TS-424-HC(MAD)-2024-GST]

#### lssue

• Whether a show cause notice can be issued without issuing notice in Form GST ASMT-10?

#### Ratio

- The purpose of scrutiny under Section 61 of the Central Goods and Services Tax Act, 2017 (CGST Act) is to verify the correctness of returns and inform the taxpayer of any discrepancies. If it is construed mandatory, it would mean that every return of every registered person shall be verified by the tax authorities. Consequently, self-assessment would be rendered otiose.
- Under Section 61(1) of the CGST Act, the obligation to issue notice is not triggered merely by the selection of the returns for scrutiny but by the discovery of discrepancies in such returns. Thus, upon fulfilment of the following two conditions, there exists an obligation to issue notice:
  - Selection of returns for scrutiny, and
  - Discoveries of discrepancies on such scrutiny.

The purpose of such notice would be to enable the registered person to provide an explanation, discontinue action if the explanation is in order or initiate actions under Sections 65, 66 or 67 of the CGST Act or determine tax or other dues under Sections 73 or 74 of the CGST Act.

- The consequence of not issuing notice in Form GST ASMT-10, in spite of noticing discrepancies after selecting and scrutinising the returns would be that it vitiates the scrutiny process including the discrepancies noticed thereby and the quantification, if any, done in course thereof. As regards adjudication, the limited impact would be that the scrutiny under Section 61 of the CGST Act cannot be relied upon for adjudication.
- On close examination of Sections 61 and 73 of the CGST Act, there is no indication that scrutiny of returns and the issuance of notice in Form GST ASMT-10 constitutes a mandatory pre-requisite for adjudication even in cases where the returns were scrutinised.

## Proceedings cannot be initiated against a non-existing company after its amalgamation

Trelleborg India Private Limited Vs. State of Karnataka [TS-414-HC(KAR)-2024-GST]

### lssue

- Trelleborg Sealing Solutions (India) Pvt. Ltd. (TSSIPL) was amalgamated with Trelleborg India Pvt. Ltd. (TIPL) in terms of the order passed by the National Company Law Tribunal on 13 June 2017. Subsequently, TSSIPL had filed an application for cancellation of GST registration on 29 November 2021. Vide order dated 3 December 2021, the tax authorities allowed the application, and the effective date of cancellation of GST registration was stipulated as 29 November 2021.
- Pursuant to the above, TSSIPL received intimations in Form GST DRC-01A for various tax periods. In response, TIPL had
  filed a response intimating the tax authorities about the amalgamation of TSSIPL with TIPL. Despite this, the tax
  authorities proceeded to issue a show cause notice in Form GST DRC-01 to TSSIPL.

## lssue

• Whether proceedings can be initiated against TSSIPL, being a non-existing company after its amalgamation with TIPL?

Ratio

- Relying on the Supreme Court decision in Principal Commissioner of Income Tax, New Delhi Vs. Maruti Suzuki (India) Limited [2020 (18) SCC 331], it is clear that once an amalgamating entity ceases to exist upon an approved scheme of Amalgamation, the question of continuing the proceedings as regards the non-existent company cannot be permitted. A similar view was also taken by the Karnataka High Court in M/s. Rajdisle Private Limited v. The Income Tax Officer and Another [W.P. No. 14156/2024]
- In the present case, since the notices/ endorsements are issued to TSSIPL, being a non-existent entity, the same are set aside. However, the tax authorities are at liberty to pursue the proceedings against the appropriate entity in the manner permissible in law.



# **CUSTOMS**

# LEGISLATIVE UPDATES

## NOTIFICATION

27/2024- Customs <sup>14</sup>	Effective 15 July 2024, goods imported by SEZ unit or SEZ developer for authorised operations is exempted from the levy of Cess leviable.
28/2024- Customs <sup>15</sup>	<ul> <li>Effective 15 July 2024, Notification No. 50/2017-Customs dated 30 June 2017 which <i>inter alia</i> prescribes the effective rate of customs duties is inter alia amended as under:</li> <li>Uniform rate of 5% IGST would be levied on import of components or parts, prescribed in specified manuals, when imported into India for servicing, repair, maintenance or overhauling, subject to certain conditions and restrictions.</li> <li>Exemption from payment of IGST on import of equipment or buoys required for Research Moored Array for African Asian Australian Monsoon Analysis and Prediction (RAMA) programme, subject to certain conditions and restrictions. The exemption will remain in effect till 31 July 2026.</li> </ul>
14/2024- Customs (ADD) <sup>16</sup>	Notification No. 14/2020-Customs (ADD) dated 9 June 2020 inter alia imposing of Anti-dumping Duty on import of ' <i>Flexible Slabstock Polyol of molecular weight 3000-4000</i> ' falling under HSN 3907 20, originating in Singapore and produced by M/s. Shell Eastern Petroleum (Pte) Ltd. is amended to change the name of Producer to 'M/s. Shell Singapore Pte. Ltd.'

Circular No. 09/2024- Customs <sup>17</sup>	Circular No. 29/2020-Customs dated 22 June 2020 is amended to also allow transhipment of goods by road from Land Customs Station Petrapole to Air Cargo Complex, Kempegowda International Airport, Bengaluru with effect from 15 July 2024, subject to the procedure prescribed in above mentioned Circular.
Instruction No. 17/2024- Customs <sup>18</sup>	Instruction No. 07/2024 dated 1 April 2024 <sup>19</sup> which notified the list of authorised officers (FSSAI and Customs officials) at 155 prescribed Points of Entry has been expanded to provide 4 additional Points of Entry.
Instruction No. 18/2024- Customs <sup>20</sup>	<ul> <li>The applicability of SCOMET policy on Irregular Aluminium Powder falling under the three categories viz, 3A301.c, 6A008.c and 6A008.h as clarified by DGFT is as follows:</li> <li>Aluminium Powder under category 3A301.c and 6A008.c will fall under SCOMET if the aluminium powder is spherical or spheroidal in shape. Accordingly, a report of any government or NABL-accredited laboratory can be produced (to the satisfaction of tax authorities) for determination of the shape and size of the particle as to whether it is spherical or spheroidal or otherwise, if required.</li> <li>Aluminium Powder under category 6A008.h will fall under SCOMET if it is in the nature of reactive material (viz., powder manufactured under vacuum conditions or by use of noble gases) and would require a SCOMET license.</li> </ul>

## INSTRUCTION/ CIRCULAR





# LEGISLATIVE UPDATES

#### NOTIFICATION

19/2024-25 <sup>21</sup>	Effective 5 July 2024, Notification No. 52/2023 dated 12 December 2023 <sup>22</sup> is amended to the extent that export of Rice (Basmati and Non-Basmati) to EU member states and other European Countries namely the United Kingdom, Iceland, Liechtenstein, Norway and Switzerland only will require Certificate of Inspection from Export Inspection Council (EIC)/ Export Inspection Agency (EIA). Exports to remaining European countries will not require Certificate of Inspection by EIC / EIA for export for a period of six months.
20/2024-25 <sup>23</sup>	Import of Potatoes under ITC (HS) code 0701 9000 is allowed from Bhutan without any Import Licence, up to 30 June 2027.

## TRADE NOTICE/ CIRCULAR/ PUBLIC NOTICE

<i>Vide</i> Trade Notice No. 07/2024-2025 dated 28 June 2024 <sup>25</sup> , Interest Equalisation Scheme (IES) for Pre and Post shipment Rupee Export Credit was extended for two months (up to 31 August 2024). In this regard, it is clarified that:
<ul> <li>IES will be capped at INR 16.6mn per IEC from 1 July 2024 to 31 August 2024.</li> </ul>
<ul> <li>IES, extended vide the abovementioned Trade Notice, is applicable only to MSME Manufacturer Exporters who are eligible for IES benefit of 3%.</li> </ul>
<ul> <li>Applicants would not be required to generate revised UIN for the extended period if they have already generated UIN for the FY 2024-2025.</li> </ul>
The use of SEZ-Online portal for filing of documents by SEZ units is extended till 12 August 2024. However, units who have migrated to ICEGATE are not allowed to file through SEZ-Online and shall continue to file their future transactions through ICEGATE only. It is also clarified that Remission of Duties and Taxes on Exported Products (RoDTEP) benefits shall not be available to the SEZ units unless they migrate to ICEGATE.

# SPECIAL ECONOMIC ZONE



# LEGISLATIVE UPDATES

## INSTRUCTION/ CIRCULAR

No. J.16/3/2007-SEZ Vol-V<sup>27</sup> The use of SEZ-Online portal for filing of documents by SEZ units is extended till 12 August 2024. However, units who have migrated to ICEGATE are not allowed to file through SEZ-Online and shall continue to file their future transactions through ICEGATE only. It is also clarified that Remission of Duties and Taxes on Exported Products (RoDTEP) benefits shall not be available to the SEZ units unless they migrate to ICEGATE.

# CENTRAL EXCISE/ SERVICE TAX/ VALUE ADDED TAX



# LEGISLATIVE UPDATES

## NOTIFICATION

18/2024- Central Excise <sup>28</sup>	Effective 16 July 2024, the applicable rate of Special Additional Excise duty on production of 'Petroleum Crude' (HSN 2709) has been increased from INR 6,000 per tonne to INR 7,000 per tonne.
No.F.12(26)FD/ Tax/2024-81 (Rajasthan) <sup>29</sup>	<ul> <li>The Rajasthan Amnesty Scheme, 2024 (Scheme) notified <i>vide</i> Notification F.12(7)FD/ Tax/2024-72 dated 8 February 2024<sup>30</sup> is inter alia amended as under:</li> <li>The Scheme will remain applicable till 31 December 2024 (earlier 31 July 2024).</li> <li>Further, where the outstanding demand does not exceed INR 1mn in a single entry in DCR, the whole amount of tax, interest, penalty and late fee, if any, along with interest accrued up to the date of order under this scheme shall be waived, without any condition.</li> </ul>

## TRADE NOTICE/ CIRCULAR/ PUBLIC NOTICE

Circular No. 1086/01/2024- CX <sup>31</sup>	<ul> <li>The revised monetary limits (subject to certain conditions) are prescribed for adjudication of Show Cause Notices under the Central Excise Act, 1944 (CE Act), for commodities classified under Chapter 24 of Schedule IV of the CE Act.</li> </ul>
	<ul> <li>The Circular also provides that the show cause notice by the adjudicating authority under the CE Act shall be assigned to the relevant adjudicating authority under the Central Goods and Services Tax Act, 2017 (CGST Act).</li> </ul>

# JUDICIAL UPDATES

# Remuneration paid to Managing Director (MD) does not attract service tax liability under the reverse charge mechanism (RCM)

## Amara Raja Batteries Ltd. Vs. Commissioner of Central Tax [TS-273-CESTAT-2024-ST]

## Issue

Whether the remuneration paid to MD attracts service tax liability under the RCM?

## Ratio

- Under the Finance Act, 1994 (FA), service tax is levied only on the services provided by Directors and not on the services
  provided by an employee to the employer. The mode of appointment of MD, CEO, whole-time director, Manager, etc. can
  vary depending on the Companies Act, 2013 (Companies Act) as well as Articles of Association (AoA) of the Company but
  the fact remains that all these officers are "key managerial persons" (KMP) under the Companies Act.
- In Ram Prasad Vs. CIT [1972 (86) ITR 122 (SC)], it was held that a managing director may have a dual role, in as much as he may be both, a director as well as an employee. In the present case, merely because there is a restrictive clause or a flawed selection process in the appointment of MD, the MD cannot be termed as a non-employee if he is performing certain functions assigned to him by the Board. A mere director or an independent director who is not an employee cannot take administrative or managerial decision whereas MD is not only a director but also manages the affairs of the Taxpayer and in that sense, he is serving the Taxpayer.
- Under the Companies Act, a MD/ director can also be appointed as director on the boards of other companies. Therefore, in his capacity as a director, he is eligible to be a director on the Board of other companies and to that extent, it cannot be said that he ceases to be a whole-time director or MD and instead, becomes a part-time MD or director.
- Circular No. 140/10/2020-GST dated 10 June 2020 clarified that a director may have dual capacities; one as a director of the company and based on contractual relationship of master and servant with the company, i.e., under a contract of service (employment). While the Circular deals with respect to taxability under GST law, the same is applicable under the Service tax law.
- A holistic perusal of the contract/ agreement between the Taxpayer and the MD indicates that the same is an employment agreement. The Income tax department has not raised any objection on TDS deduction qua remuneration/ commission paid to MD. Thus, if one Department has not objected that it is not salary, the same ought to have relevance to decide the context in which the employer-employee relationship is to be decided.
- In view of the above, the appeal filed by the Taxpayer was allowed and the Impugned Order holding that the Taxpayer is liable to discharge service tax under RCM is set aside with consequential reliefs.

# INDIRECT TAX NEWS FLASH



Economic Times (7 July 2024, 12 July 2024 and 15 July 2024)	<ul> <li><u>Budget 2024: Ombudsman body and more on Nirmala Sitharaman's to-do list for PLI scheme</u></li> <li><u>CBIC issues fresh norm for recovery of GST dues</u></li> <li><u>Govt implements uniform 5% tax for all aircraft, aircraft engine parts</u></li> </ul>
Moneycontrol (4 July 2024 and 9 July	<ul> <li>Industry expects correction of inverted duty structure on leather, textiles in Budget 2024-25</li> <li>Budget 2024 Expectations Highlights: Global minimum tax legislation likely to be proposed on July 23</li> </ul>
Business Standard (11 July 2024)	<ul> <li>FinMin notifies GSTR-1A, allows taxpayers to amend outward supply form</li> <li>Budget 2024: Travel agents expect GST rate rationalisation for tourism</li> <li>In a relief to companies, CBIC clarifies taxability on corporate guarantee</li> </ul>
The Hindu (8 July 2024 and 16 July 2024)	<ul> <li>Govt. reopens PLI scheme for white goods till October 12</li> <li>ICEU seeks removal of GST on insurance premium</li> </ul>
Business Today (10 July 2024)	<ul> <li>Union Budget 2024: What India Inc is expecting from FM in terms of reforms in GST arena</li> </ul>

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