

P.R. GUPTA & CO.

CHARTERED ACCOUNTANTS

April 1, 2023

'TAX AMENDMENTS BY FINANCE ACT, 2023'

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"Budget is an annual ritual at this time of the year and the whole country looks at it keenly as it impacts each one of us and the economic growth of the country is dependent on it."

I. PREAMBLE:

The Budget for 2023-24 was presented in the Parliament on 1st February 2023 by the Hon'ble Finance Minister Nirmala Sitharaman. Finance Bill 2023 has already been passed by both houses of Parliament after considering some amendments and has now become an Act after assent of the President of India on 31st March, 2023.

II. FINANCE ACT, 2023 (DIRECT TAX AMENDMENTS):

The following are some of the important amendments in respect of Personal Income Taxes made in the Finance Act, 2023 including the amendments proposed while passing the Bill in the Lok Sabha.

A) PERSONAL TAXES:

1) Rates of Taxes:-

No Change in personal rates of Taxes under the old system where the deductions are allowed

However, there are beneficial changes in the New System under section 115BAC for availing benefit of reduced slab rates of taxes by foregoing certain deductions. Salient features are as follows:

- a) In fact, New System has been made the default regime and one will have to opt out of it on or before the due date of filing the return to choose the old system. This will mean that deductions can be availed under the old system only when the Tax Return is filed within the due date.
- b) Apart from Individual & HUF, now the benefit can also be taken by Body of Individuals whether incorporated or not, Association of Person (other than Co-operative society) & Artificial Juridical Person referred to in section 2(31)(vii).
- c) New Slab Rates are as follows:

Income	Rate of Tax
0-300,0000	NIL
3,00,001 – 6,00,000	5%
6,00,001 – 9,00,000	10%
9,00,001-12,00,000	15%
12,00,001-15,00,000	20%
Above 15,00,000	30%



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- d) From Assessment year 2024-25 relevant to financial year 2023-24, the standard deduction of Rs. 50,000 from Salary and deduction from family pension will also be allowed even under the new system which was not allowed earlier.
- e) The deduction under section 80CCD(2) will continue to be available
- f) Earlier there was no deduction under section 87A for new system. But from Assessment year 2024-25, for Taxable Income up to Rs. 7 Lacs. rebate will be allowed for the amount of tax due up to a maximum of Rs. 25,000. This means there will be no tax for Taxable Income up to Rs. 7 Lacs.
- g) Under the New System. Even Marginal relief will also be given where taxable income is up to Rs. 7.25 Lacs
- h) Under the New System, highest surcharge has been pegged at 25% on income above 5 Crores instead of 37% in the old System.
- i) A new deduction under Section 80CCH is proposed, which provides for deductions to Individual enrolled in Agnipath Scheme



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on or after 01st November, 2022. The deduction shall be equal to the amount of contributions made to the Agniveer Corpus Fund. This deduction is available in old as well as new tax regime.

- j) Scheme of partial integration of tax on non-agricultural income with agricultural income will be applicable in the case of residents.

2) **Taxability of Specified Debt Funds:**

Another important amendment is in respect of taxability of any gains or profits arising on transfer, redemption or maturity of market linked debentures and debt mutual funds.

- a) The Finance Bill has inserted a new section 50AA providing for the taxability of any gain on transfer, redemption or maturity of market linked debenture (MLD) on or after 1 April, as a short-term capital gain, irrespective of the period of holding.

Market linked debentures are where return is not fixed but linked to certain market index. These are structured fixed income securities with no periodic pay-outs except at maturity.



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- b) Presently, the units of debt mutual funds held for more than three years are taxable as long-term capital gains and are taxable at 20% plus applicable surcharge and cess, along with the indexation benefit.

However, Section 50AA now provides that the units of specified mutual funds, acquired on or after 1 April 2023 when sold will result in short term capital gains irrespective of the period of holding. The specified Mutual Funds shall be wherein not more than 35% of the total proceeds are invested in equity shares of domestic companies.

Thus, any gain or income arising on transfer, redemption or maturity of a unit of debt mutual funds, acquired on or after 1 April 2023, will be considered as short-term capital gains, and taxable at the applicable slab rate of the investor, irrespective of the period of holding. Indexation benefit is also not available in case of short-term capital gain.

The mutual funds are categorised under two categories:

i) Equity Oriented Funds:

As per explanation to Section 112A, “Equity Oriented Fund” means a fund setup under a scheme of a mutual fund specified



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under clause(23D) of section 10 or under a scheme of an insurance company comprising unit linked Insurance policies to which exemption under section 10(10D) does not apply because the policy is issued on or after 1st February,2021 and premium in any of the year exceeds two lacs fifty thousand rupees

And

In a case where the funds invest in the units of another fund which is traded on a recognised stock exchange, A minimum of ninety percent of its total proceeds of such fund is invested in the units of such other fund and such other fund also invests a minimum of ninety percent of its total proceeds in the equity shares of domestic companies listed on a recognised stock exchange and

In any other case , a minimum of sixty-five percent of the total proceeds of such fund is invested in the equity shares of domestic companies listed on the recognised stock exchange

ii) Debt Funds:

Any fund other than Equity Fund will be classified as Debt fund

Now a third category has been carved out i.e Debt Funds specified under section 50AA: Accordingly, the coverage of section 50AA include the units of specified mutual funds, wherein not more than



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35% of the total proceeds are invested in equity shares of domestic companies.

Therefore, it will be interesting to note that all Debt Funds will not be subjected to the new provisions and only some of the debt funds covered under section 50AA will be subjected to new regime.

3) Taxability of Receipts from Insurance Policies:

Receipts arising from life insurance policies issued on or after April 1st, 2023 shall be considered as income from other sources if the premium paid exceeds Rs. 5,00,000 in any given year. The exemption for receipts in the event of the insured person's death shall remain non-taxable.

4) Limit placed on availing deduction under section 54 & 54F:

The cost of new house in which re-investment is made will be restricted to 10 crores rupees. The amount exceeding 10 crore shall not be considered for availing exemption under section 54 or 54F

5) Cost of borrowing not to be included in certain cases:

As per court cases, assessee could avail deduction of interest on borrowed capital from income from house property as well as it could be added in the cost of acquisition for capital gains purposes. Now such



interest shall not be allowed as cost of asset if it has been claimed as deduction under section 24 (i.e against house property income) .

6) Conversion of Gold in Electronic Gold Receipt and Vice Versa:

The concept of Electronic Gold Receipt (EGR) is new and should pick up in times to come. EGR is issued by approved Vault operators regulated by SEBI. It is like keeping one shares in DMAT Account and shall be tradeable on stock exchange.

To give impetus, it has been specified that no capital gains will be levied at the time of conversion of Gold to EGR and from EGR to Gold.

Further section 2(42A) has been amended to provide that for the purpose of ascertaining short term or long term capital gains, holding period will include the period for which the Gold or EGR was held prior to conversion into EGR or Gold as the case may be.

7) Sum Received under Life Insurance Policies:

A new section 56(2)(xiii) has been introduced and taxable amount shall be computed as per the method prescribed. However, this will not be applicable where amount is exempt under section 10(10D).



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8) Cost of acquisition of certain assets :

The courts have held that in certain cases, the absence of ascertainment of cost which include cost of improvement will lead to capital gains being not taxed.

To obviate any ambiguity, Section 55 already provides that for the purpose of section 48 and section 49, cost of improvement in the case of “Goodwill of a business” and “right to manufacture, produce or process any article or thing or right to carry on business or profession is taken as NIL. In other words, cost can be taken only when purchased from someone else.

Now section 55 has further been amended and scope has been expanded to specify that cost of improvement of any “Intangible asset or Right” will also be deemed to be NIL.

9) Non-Residents within the ambit of angel tax:

Section 56(2)(viib), inter-alia provides that where a closely-held company receives any consideration from a *person resident in India* for issue of shares that exceeds the face value of the shares, then the consideration which exceeds the fair market value of shares, shall be chargeable as “Income from other sources”. Though some exemptions



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have been given in certain circumstances like money received from venture capital undertaking from venture capital fund.

Amendment has been now been made to cover cases under the ambit of 56(2)(viib) where money is received from “Non-Residents”. So far issue of shares to Non-resident, Fair value was considered by Reserve Bank of India on the basis of Discounted Free cash flow method and the valuation could be made by a Chartered Accountant. However now the fair value will have to be determined as per Rule 11UA. The valuation under Discounted Free Cash Flow will need to be made by Merchant Banker.

10) Gift to Not-Ordinary Resident:

Section 9 specifies those incomes which are deemed to accrue or arise in India regardless of the actual place of accrual. In July 2019 amendment was made to provide that gifts above Rs 50,000 made to Non-Residents abroad were deemed to accrue or arise in India and accordingly taxable in India.

Now Not-Ordinary Residents have also been covered. However, exemption to close relative as per section 56 shall continue to be available in genuine cases.



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11) **Distribution by Business Trust to unitholders:**

The Finance No. (2) Act, 2014 introduced a special taxation regime for business trusts (i.e Real Estate Investment Trust (REIT) and Infrastructure Investment Trust (In VIT). Section 115UA, inter-alia provides a pass-through status and accordingly if the distributed income is in the nature of rental income, interest or Dividend received by the business trust from the SPV (in which investment has been made by business trust), the income was taxable only in the hands of unitholder of the business trust.

Business trusts were giving funds to SPV in the form of equity and Debt. Accordingly, distribution to unitholders which is shown as repayment of debt, nothing is taxable in the hands of business trust and also escape taxation in the hands of investors. To check this dual non-taxation, section 56(2)(xii) has been inserted to provide that any specified sum by way of distribution by business trust will be taxable in the hands of investors as per prescribed formula.

Further it has been provided that cost of acquisition of units of a business trust shall be reduced by any sum received by unitholder from the business trust which is not in the nature of income referred to in section 10(23FC)/10(23FCA) and which is not chargeable to tax under section 56(2)(xii)/115UA(2).



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12) Tax Rates on certain income of Non-Resident:

Tax rates on dividend, royalty and technical fees in the case of non-residents/foreign companies is specified under section 115A. The modified rates are given below:

Nature of income	New Rates	Old Rates
Dividend received from a unit in an International Financial Services Centre (section 80LA(1A))	10%	20%
Royalty covered by section 115A(1)(b)	20%	10%
Technical Fees covered by section 115A(1)(b)	20%	10%

Identical changes have been made for Tax Deduction at Source for financial year 2023-24. Benefit of Double Taxation Treaty can be taken and lower of rates specified in treaty or these rates will be applicable.

13) Tax Collection at Source (TCS) on Remittance under Liberalised Remittance Scheme (LRS):

An authorised dealer (who receives an amount from a person resident in India for remitting out of India under LRS of RBI or a seller of overseas tour package is required to collect tax at source under section 206C(1G)



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Under LRS, a resident of India can remit up to \$2,50,000 in a financial year. However caution needs to be taken that any unused money for the purpose for which it was sent should be remitted back within 180 days of remittance.

The amended provisions w.e.f 1st July,2023 are as follows:

Scenario	TCS Rate & threshold limit
Remittance for education from any loan taken from financial institution specified in section 80E	0.5% of amount in excess of 7 Lacs rupees in a financial year
Remittance of education other than above and remittance for medical treatment	5% of the total amount remitted in excess of rupees seven lacs
Any other case & Overseas tour package	20% without any threshold limit

It may be noted that TCS is an amount collected by authorised dealer and credit of the same shall be accorded in the Income Tax Return.

14) **Adjustment / withholding of Refund :**

Section 245 has been substituted w.e.f 1st April,2023 to provide as follows:



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Where refund becomes due under any provisions of the Act, The assessing office or any higher authority may in lieu of payment of refund, set off the amount to be refunded against any sum remaining payable after giving an intimation in writing to the concerned person

Where a refund is due and assessing officer is of the opinion the grant of refund shall adversely affect the revenue, he may withhold refund after approval of Commissioner of Income Tax or Pr. CIT.

15) Interest on Refund :

As per section 244(1), interest at the rate of half percent per month is payable on refund amount from 1st day of financial year till the refund is granted .

Further as per section 244(1A), in a case refund is due as per appeal order, an additional interest on the amount of refund calculated at the rate of 3% per annum.

Now an amendment has been made that where refund is withheld by assessing officer for reason of assessment/re-assessment proceedings , for calculating the addition interest under 244(1A), the period beginning from the date on which refund is withheld under section 245(2) and ending with the date on such assessment/re-assessment is made shall be excluded.



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B) Business & profession related amendments:

1) Increasing threshold limit for Presumptive Taxation Regime:

A resident assessee (Individual, HUF or a partnership firm other than LLP) carrying on eligible business and having a turnover up to Rs two crores needs to declare income at the rate of 6%/8% of the Turnover/Gross receipt or the actual profit earned whichever is more as per presumptive scheme.

Now from financial year 2023-24, if in the case of an assessee, the amount received in cash/(cheque which is not account payee) does not exceed 5% of the total turnover/Gross Receipt, the threshold limit for business shall be Rs three crores for the purpose of declaring profits on presumptive basis under section 44AD(1).

A resident assessee (Individual, HUF or a partnership firm other than LLP) engaged in a profession referred to in 44AA(1) and whose total gross receipts do not exceed 50 Lakhs, can declare profit at 50% of the gross receipt or actual profit claimed to be earned, whichever is more as per presumptive scheme.

Now from financial year 2023-24, if in the case of an assessee, the amount received in cash/(cheque which is not account payee) does not exceed 5% of the total turnover/Gross Receipt, the threshold limit in



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the case of Profession it will be seventy five lakhs for the purpose of declaring profits on presumptive basis under section 44ADA(1).

2) **Tax Audit limits:**

Amendment has been made in section 44AB basically to accommodate cases where profits are declared as per presumptive tax regime. Latest Provisions are explained below for applicability of Tax Audit from assessment year 2024-25.

For Business:

- a) If Turnover exceeds 10 Cr—Applicable in all such cases.
- b) If turnover is above 3 Cr and up to 10 Cr—then not applicable if both cash Receipt and cash Payment do not exceed 5% of Total Receipts or Total Payments respectively.
- c) If turnover is above 2 Cr and up to 3 Cr—then not applicable
 - i) if profits declared as per section 44AD(1) or
 - ii) if profits declared lower, then both cash Receipt and cash Payment do not exceed 5% of Total Receipts or Total Payments respectively and case does not fall under section 44AD(4)
- d) If turnover is above 1Cr but up to 2 Cr---Then not applicable
 - i) if profits declared as per section 44AD(1) or



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- ii) if profit is declared lower but both Cash Receipt and cash Payment do not exceed 5% of Total Receipts or Total Payments respectively and case does not fall under section 44AD(4)
- e) If turnover is below 1 Cr, then not applicable except if covered under point (f)
- f) If section 44AD(4) is applicable for a particular year , then Tax audit is applicable irrespective of turnover because he is debarred from filing under section 44AD(1) for that year.

For Profession:

- a) If gross receipts from profession does not exceed 50 Lakhs, then Tax audit is not applicable
- b) If gross receipts exceed 50 Lakhs but does not exceed 75 Lakhs, Tax Audit is not applicable if Profits declared under section 44ADA(1)
- c) If gross receipts exceed 75 Lakhs, then applicable in all cases.

3) Consequences of late payment to Micro and Small Enterprises:

In order to promote timely payment to “Micro”, “Small” and “Medium” enterprises, the provisions of MSMED Act are already in place. As per those provisions if the payments are not made in time as



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specified in the MSMED Act, then Interest on the delayed payment is not allowable in the Income Tax Act under any circumstances. In addition, such cases are to be reported to MCA by companies.

To give further impetus to Payments to “Micro” and “Small” enterprises, provisions of section 43B have been modified from assessment year 2024-25. Accordingly, if payments to these two categories by an assessee is delayed beyond the time limit specified under MSMED Act, then such payments will be allowed in the year in which payment is made. It may be noted that the benefit of payment made up to due date of filing the return shall not be accorded as in other cases of 43B.

However, if payment is made to these two categories of enterprises within due date specified under MSMED Act, it will be allowed on accrual basis.

Further it may be noted that the delayed payments to “Medium” enterprises will not be covered under section 43B and these will continue to be allowed on accrual basis.



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4) Time Limits specified in the case of SEZ (Section 10AA):

Deduction under section 10AA will be allowed only if the Income tax return is filed within the due date as specified under section 139(1)

Further deduction under section 10AA shall be allowed , if export proceeds are remitted back to India within 6 months from the end of previous year or within such extended period allowed by competent authority.

5) Benefits /perquisites may be in cash or in kind for section 28(iv):

Section 28(iv) provides that the value of any benefit or perquisite whether convertible into money or not, arising from business or the exercise of profession shall be chargeable to income tax under the head “Profits & Gains from Business or Profession”.

Though the Board had clarified earlier that benefit or perquisite can be in cash or in kind but Supreme Court in CIT v. Mahindra & Mahindra Ltd. held that benefit or perquisite should be other than in the shape of money. For example waiver of loan is in the form of cash/money and could not be taxed under section 28(iv).



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Amendment has been made from assessment year 2024-25 to plug this loophole. It has now been specified in section 28(iv) that benefit or perquisite can also be in the form of cash/money.

6) Extension of date of incorporation for eligible start-up :

Section 80-IAC, inter-alia provides for 100% deduction in the case of profits derived from an eligible business by an eligible start-up for 3 consecutive years out of 10 years, beginning from the year of incorporation, at the option of assessee subject to certain conditions. The eligible start-up should have been incorporated up to 31st March,2023.

The sun set clause for incorporation of eligible start-up has been extended till 31st march,2024.

Carry Forward and Set Off of Losses: Section 79 of the IT Act restricts the ability of a company, in which public are not substantially interested, from carrying forward tax losses in case of a change in shareholding beyond 51%. However, this Section allows a relaxation to 'eligible start-ups' provided all the shareholders of such company as on the last date of the year in which loss was incurred, continue to remain shareholders of the company on the last day of the year in which the loss is sought to be set-off, provided the loss has been



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incurred during the period of seven years beginning from the year in which the company is incorporated. It is now proposed to extend this period of seven years to ten years. These amendments will take effect from April 01, 2023 and will apply in relation to AY 2023-24 and subsequent AYs.

7) Preventing undervaluation of Inventory (Section 142):

For valuation of Inventory, one has to follow ICDS-II. Section 148 of Companies Act, 2013 also mandates maintenance of cost records and cost audit in applicable cases.

Section 142 has been amended to provide that during any assessment proceedings, directions can be issued if having regard to nature and complexity of the accounts and if the assessing officer it is necessary to do so and a cost accountant shall be appointed for this purpose.

III. FINANCE ACT, 2023 (INDIRECT TAX AMENDMENTS):

Amendments carried out in the Finance Bill, 2023 except those in clause 142 will come into effect from the date when the same will be notified concurrently, as far as possible, with the corresponding amendments to the similar Acts passed by the States & Union territories with legislature. Amendments carried out in the Finance



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Bill, 2023, vide clause 142 will come into effect retrospectively from 1st July, 2017.

AMENDMENTS IN THE CGST ACT, 2017

Clause 128 of Finance Bill 2023:

Clause (d) of sub-section (2) and Clause (c) of sub-section (2A) in section 10 of the CGST Act is being amended so as to remove the restriction imposed on registered persons engaged in supplying goods through electronic commerce operators from opting to pay tax under the Composition Levy.

Clause 129 of Finance Bill 2023:

Second and third provisos to sub-section (2) of section 16 of the CGST Act are being amended to align the said sub-section with the return filing system provided in the said Act.

Clause 130 of Finance Bill 2023:

Explanation to sub-section (3) of section 17 of the CGST Act is being amended so as to restrict availment of input tax credit in respect of certain transactions specified in para 8(a) of Schedule III of the said Act, as may be prescribed, by including the value of such transactions in the value of exempt supply.



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Further, sub-section (5) of said section is also being amended so as to provide that input tax credit shall not be available in respect of goods or services or both received by a taxable person, which are used or intended to be used for activities relating to his obligations under corporate social responsibility referred to in section 135 of the Companies Act, 2013.

Clause 131 of Finance Bill 2023:

Sub-section (1) and sub-section (2) of section 23 of the CGST Act are being amended, with retrospective effect from 01st July, 2017, so as to provide that persons for compulsory registration in terms of sub section (1) of section and section 22 of the Act need not register if exempt under sub section (1) of section 23.

Clause 132 of Finance Bill 2023:

A new sub-section (5) in section 37 of the CGST Act is being inserted so as to provide a time limit upto which the details of outward supplies under sub-section (1) of the said section for a tax period can be furnished by a registered person. Further, it also seeks to provide an enabling provision for extension of the said time limit, subject to certain conditions and restrictions, for a registered person or a class of registered persons



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Clause 133 of Finance Bill 2023:

A new sub-section (11) in section 39 of the CGST Act is being inserted so as to provide a time limit upto which the return for a tax period can be furnished by a registered person. Further, it also seeks to provide an enabling provision for extension of the said time limit, subject to certain conditions and restrictions, for a registered person or a class of registered persons.

Clause 134 of Finance Bill 2023:

A new sub-section (2) in section 44 of the CGST Act is being inserted so as to provide a time limit upto which the annual return under sub-section (1) of the said section for a financial year can be furnished by a registered person. Further, it also seeks to provide an enabling provision for extension of the said time limit, subject to certain conditions and restrictions, for a registered person or a class of registered persons.

Clause 135 of Finance Bill 2023:

A new sub-section (15) in section 52 of the CGST Act is being inserted so as to provide a time limit upto which the statement under sub-section (4) of the said section for a month can be furnished by an electronic commerce operator. Further, it seeks to provide an enabling



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provision for extension of the said time limit, subject to certain conditions and restrictions, for an electronic commerce operator or a class of electronic commerce operators.

Clause 136 of Finance Bill 2023:

Sub-section (6) of section 54 of the CGST Act is being amended so as to remove the reference to the provisionally accepted input tax credit to align the same with the present scheme of availment of self-assessed input tax credit as per sub-section (1) of section 41 of the said Act.

Clause 137 of Finance Bill 2023:

Section 56 of the CGST Act is being amended so as to provide for an enabling provision to prescribe manner of computation of period of delay for calculation of interest on delayed refunds.

Clause 138 of Finance Bill 2023:

A new sub-section (1B) in section 122 of the CGST Act is being inserted so as to provide for penal provisions applicable to Electronic Commerce Operators in case of contravention of provisions relating to supplies of goods made through them by unregistered persons or composition taxpayers.



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Clause 139 of Finance Bill 2023:

Sub-section (1) of section 132 of the CGST Act is being amended so as to decriminalize offences specified in clause (g), (j) and (k) of the said sub-section and to increase the monetary threshold for launching prosecution for the offences under the said Act from one hundred lakh rupees to two hundred lakh rupees, except for the offences related to issuance of invoices without supply of goods or services or both.

Clause 140 of Finance Bill 2023:

First proviso to sub-section (1) of section 138 of the CGST Act is being amended so as to simplify the language of clause (a), to omit clause (b) and to substitute the clause (c) of said proviso so as to exclude the persons involved in offences relating to issuance of invoices without supply of goods or services or both from the option of compounding of the offences under the said Act. It further seeks to amend sub-section (2) so as to rationalize the amount for compounding of various offences by reducing the minimum as well as maximum amount for compounding.



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Clause 141 of Finance Bill 2023:

A new section 158A in the CGST Act is being inserted so as to provide for prescribing manner and conditions for sharing of the information furnished by the registered person in his return or in his application of registration or in his statement of outward supplies, or the details uploaded by him for generation of electronic invoice or E-way bill or any other details, as may be prescribed, on the common portal with such other systems, as may be notified.

Clause 142 of Finance Bill 2023:

Schedule III of the CGST Act is being amended to give retrospective applicability to Para 7, 8 (a) and 8 (b) of the said Schedule, with effect from 01st July, 2017, so as to treat the activities/ transactions mentioned in the said paragraphs as neither supply of goods nor supply of services. It is also being clarified that where the tax has already been paid in respect of such transactions/ activities during the period from 01st July, 2017 to 31st January, 2019, no refund of such tax paid shall be available.

AMENDMENTS IN THE IGST ACT, 2017**Clause 143 of Finance Bill 2023:**

Clause (16) of section 2 of the IGST Act is being amended so as to revise the definition of "non-taxable online recipient" by removing the



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condition of receipt of online information and database access or retrieval services (OIDAR) for purposes other than commerce, industry or any other business or profession so as to provide for taxability of OIDAR service provided by any person located in non-taxable territory to an unregistered person receiving the said services and located in the taxable territory. Further, it also seeks to clarify that the persons registered solely in terms of clause (vi) of Section 24 of CGST Act shall be treated as unregistered person for the purpose of the said clause.

Also, clause (17) of the said section is being amended to revise the definition of "online information and database access or retrieval services" to remove the condition of rendering of the said supply being essentially automated and involving minimal human intervention.

Clause 144 of Finance Bill 2023:

Proviso to sub-section (8) of section 12 of the IGST Act is being omitted so as to specify the place of supply, irrespective of destination of the goods, in cases where the supplier of services and recipient of services are located in India.



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IV. CONCLUSION :

There are many other amendments relating to Tax Deduction at Source, Charitable Trusts, Transfer pricing regulations, International Financial Services Centers, Assessments proceedings and Appeals etc. which are not being included here for the sake of brevity .Income Tax Law is getting complicated day by day and needs to be understood very carefully by professionals and Income Tax Payers.

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*****END*****



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