

**IN THE INCOME TAX APPELLATE TRIBUNAL,
BANGALORE BENCH 'A'**

**BEFORE SHRI N.V VASUDEVAN, JUDICIAL MEMBER
AND
SHRI. JASON P BOAZ, ACCOUNTANT MEMBER**

ITA No.753 & 1308/Bang/2016
(Asst. Year – 2009-10)

M/s. Hibu India Private Limited
(Formely known as Yell Adworks India (P) Ltd),
Kalyanai Magnum, 7th Floor,
No. 123/1, Doraisani Palya, IIM post,
J.P.Nagar, 7th Phase,
Bengaluru

.Appellant

Vs.

The Deputy Commissioner of Income-tax Officer,
Circle-12(5),
Bangalore.

. Respondent

Appellant by : Shri C. Ramesh, CA
Respondent by : Shri B.R Ramesh, JCIT

Date of Hearing : 11-04-2018
Date of Pronouncement : 18-04-2018

ORDER

PER SHRI N.V VASUDEVAN, JUDICIAL MEMBER :

These are appeals by the assessee against the order dated 15/2/2016 and 16.5.2016 of Commissioner of Income-tax (Appeals) – 7 & 3, Bangalore, respectively, relating to asst. year 2009-10 & 2010-11.

2. These appeals filed by same assessee for two different assessment years were heard together. Since common issues are involved in these appeals, we deem it convenient to pass a common order.

(ii) Profits attributable to disallowance of expenditure are also eligible for exemption U/s.10A of the act.

16. These grounds are identical to the grounds raised in ITA No.753/ Bang/2016 by the Assessee for AY 2009-10. For the reasons stated while adjudicating identical grounds of appeal. We allow ground No.3 to 6 raised by the assessee and dismiss ground No.2 raised by the assessee. The appeal is thus partly allowed

17. In the result, both the appeals are partly allowed.

Order pronounced in the open court on **18th April, 2018.**

Sd/-
(JASON P BOAZ)
ACCOUNTANT MEMBER

Sd/-
(N.V VASUDEVAN)
JUDICIAL MEMBER

Bangalore
Dated : 18 /4/2018
Vms

Copy to :1. The Assessee
2. The Revenue
3.The CIT concerned.
4.The CIT(A) concerned.
5.DR
6.GF

By order

Sr. Private Secretary, ITAT, Bangalore