

**IN THE INCOME TAX APPELLATE TRIBUNAL
BANGALORE BENCHES : "B", BANGALORE**

**BEFORE SHRI B.R.BASKARAN, ACCOUNTANT MEMBER
AND**

SMT.BEENA PILLAI, JUDICIAL MEMBER

**IT(TP)A Nos.464 & 525(Bang)/2017
(Assessment years : 2009-10 & 2012-13)**

M/s Nova Nordisk India Pvt.Ltd.,
Plot No.32, 47-50,
EPIP Area, Whitefield,
Bangalore-560 006

Appellant

Vs

The Asst. Commissioner of Income-tax,
Circle-5(1)(1),
Bangalore

Respondent

**Appellant by : Shri Chavali Narayan, CA
Revenue by : Miss. Neera Malhotra, CIT**

Date of hearing : 19-09-2019

Date of pronouncement : 19-09-2019

ORDER

PER BENCH:

At the outset, Ld.AR submitted Mutual Agreement Procedure has been reached between Danish Competent Authority and Indian competent authority, as per the terms of double taxation avoidance agreement between India and Denmark for transfer pricing adjustments made in case of assessee for assessment years 2009-10 and 2012-13. He further submitted that assessee filed acceptance of MAP resolution with the Assessing Officer and has

discharged the additional tax demand as per order giving effect passed by Ld.AO, pursuant to the MAP resolution for assessment years 2009-10 and 2012-13.

2. Assessee submitted aforesaid facts vide its letter dated 24/07/19 filed with the registry of this *Tribunal* and has expressed for withdrawal of the appeals filed for assessment years 2009-10 and 2012-13.

3. Ld.CIT,DR do not object to the withdrawal of appeals filed by assessee.

4. Having regard to the aforesaid submissions advanced by both sides and on the basis of submissions made by assessee vide letter dated 24/07/19 for assessment years 2009-10 and 2012-13, appeals filed by assessee are allowed to be withdrawn.

5. In the result, present appeals for assessment years 2009-10 and 2012-13 stands dismissed as withdrawn.

Order pronounced in the open court on 19-19-2019.

Sd/-
(B.R.BASKARAN)
ACCOUNTANT MEMBER

Dated: 19-19-2019

***am**

Copy of the Order forwarded to:

- 1.Appellant;
- 2.Respondent;
- 3.CIT;
- 4.CIT(A);
5. DR
6. ITO (TDS)
- 7.Guard File

Sd/-
(BEENA PILLAI)
JUDICIAL MEMBER

By Order

Asst.Registrar