

**IN THE INCOME TAX APPELLATE TRIBUNAL
PUNE BENCH "A", PUNE**

**BEFORE SHRI INTURI RAMA RAO, ACCOUNTANT MEMBER
AND
SHRI S. S. VISWANETHRA RAVI, JUDICIAL MEMBER**

Sl. No.	ITA/C.O. No.	Name of Appellant	Name of Respondent	Asst. Year
1	1464/PUN/2017	ACIT, Circle-11, Pune.	HSBC Software Development (India) Pvt. Ltd., HSBC Centre, Riverside, West Avenue, 25B, Kalyani Nagar, Pune-411006. PAN : AABCH0517M	2010-11
2	25/PUN/2019	HSBC Software Development (India) Pvt. Ltd., HSBC Centre, Riverside, West Avenue, 25B, Kalyani Nagar, Pune-411006. PAN : AABCH0517M	ACIT, Circle-11, Pune.	2010-11
3	2348/PUN/2017	ACIT, Circle-11, Pune	HSBC Software Development (India) Pvt. Ltd., HSBC Centre, Riverside, West Avenue, 25B, Kalyani Nagar, Pune-411006. PAN : AABCH0517M	2011-12

Revenue by : Shri Abhinay Kumbhar &
Shri S. P. Walimbe

Revenue by : Shri Percy Jal Pardiwalla

Date of hearing : 22.07.2022

Date of pronouncement : 30.08.2022

आदेश / ORDER

PER INTURI RAMA RAO, AM:

These are five appeals under consideration. The appeals being ITA No.1464/PUN/2017 for A.Y. 2010-11, ITA No.2348/PUN/2017 for A.Y. 2011-12 are filed by the Revenue against the respective orders of Id. Commissioner of Income Tax (Appeals), Pune for the respective assessment years on record. The Cross Objection being C.O. No.25/PUN/2019 for A.Y. 2010-11 filed by the assessee in ITA No.1464/PUN/2017 for A.Y. 2010-11.

2. Since the identical facts and common issues are involved in all the above captioned five appeals, we proceed to dispose of the same by this common order.

3. First, we shall take up the appeal of the Revenue in ITA No.1464/PUN/2017 for A.Y. 2010-11 and Cross Objection filed by the assessee in C.O. No.25/PUN/2019 for A.Y. 2010-11 for adjudication.

4. Briefly, the facts of the case are that the assessee is a company incorporated under the provisions of the Companies Act, 1956. It is engaged in the business of development and sale of software development services and IT solutions to HSBC group of companies. The return of income for the assessment year 2010-11 was filed on 05.10.2010 declaring total income of Rs.36,01,71,190/-

after claiming exemption under the provisions of section 10B of the Income Tax Act, 1961 ('the Act'). Against the said return of income, the assessment was completed by the Dy. Commissioner of Income Tax, Circle-1(2), Pune ('the Assessing Officer') vide order dated 28.03.2014 passed u/s 143(3) r.w.s. 144C of the Act at total income of Rs.121,42,56,739/-. While doing so, the Assessing Officer made a disallowance under the provisions of section 10A(7) read with section 80IA(10) of Rs.85,40,85,549/-. The factual matrix of the above addition, is as under :

During the previous year relevant to the assessment year under consideration, the assessee company made a claim for exemption on profits of Rs.358,95,85,650/- under the provisions of section 10B of the Act. The profits are derived from the business of development and sale of software and IT solutions to HSBC group of companies from the units STPI in Pune. The Assessing Officer referred the matter to the TPO for the purpose of benchmarking the international transactions entered into by the assessee with its associated enterprises. The TPO accepted that the transactions between the assessee and its AEs are arm's length and no TP addition was suggested.

5. During the course of assessment proceedings, the Assessing Officer issued a show-cause notice to the assessee to explain as to

why the deduction u/s 10B should not be restricted under the provisions of section 80IA(10) as the margins earned by the assessee is at 42.49% as against the average margin of the comparables companies is 22.31%.

6. In response to the show-cause notice, the assessee company made detailed submissions vide his letter dated 25.03.2014 denying that it arranged its affairs with its AE entities to earn more than ordinary profits. It is further submitted that the average profit of the comparable determined as required under transfer pricing regulation cannot be regarded as the ordinary profits, and it is further contended that the TPO held that the transactions with its AEs are at arm's length, the profits earned by the assessee company should be accepted as ordinary profits. Rejecting the above submissions, the Assessing Officer held that the assessee company earned more than ordinary profits from transactions entered into with its AEs considering the average profits earned by the comparable companies is 22.31% as the ordinary profits, the balance was held to be extraordinary profit invoking the provisions of section 10B(7) r.w.s. 80IA(10) of the Act and proceeded to make disallowance of Rs.85,40,85,549/-.

7. Being aggrieved by the order of assessment, an appeal was filed before the ld. CIT(A) challenging the action of the Assessing

Officer invoking the provisions of sub-section (7) of section 10B r.w.s. 80IA(10) on the ground that without bringing the material on record establishing that the assessee company earned extraordinary profits on account of existence of arrangement between the assessee company and its AEs. During the course of proceedings before the ld. CIT(A), the ld. CIT(A) held that the appellant is not entitled for deduction u/s 10B on the ground that the assessee company was not approved as 100% export oriented unit as required under Explanation to section 10B of the Act. However, the ld. CIT(A) granted relief to the assessee under the provisions of section 10A of the Act.

As regards to the disallowance of Rs.85,40,85,549/-, the ld. CIT(A) after examining the sample copies of invoices, employee cost charged by the assessee company on the basis of hours spent by employee in the project on sample basis, observed that there was no abnormality in the billing pattern followed by the assessee company, accordingly held that there is no arrangement as alleged by the Assessing Officer between the assessee company and its AEs leading to the abnormal profits. The ld. CIT(A) held that mere close connection between the assessee company and its AE is not sufficient, onus lies on the Assessing Officer to demonstrate that extraordinary profits had been earned by the assessee company by

virtue of arrangement between the assessee company and its AEs. In the absence of such arrangement, the Assessing Officer cannot invoke the provisions of section 10B(7) r.w.s. 80IA(10) of the Act. Accordingly, the ld. CIT(A) directed the Assessing Officer to delete the addition u/s 10B(7) r.w.s. 80IA(10) of the Act of Rs.85,40,85,549/-.

8. Being aggrieved by that part of the order of ld. CIT(A), which is against the Revenue i.e. allowing of deduction u/s 10A and deleting the addition of Rs.85,40,85,549/- u/s 10B(7) r.w.s. 80IA(10), the Revenue is in appeal before us in ITA No.1464/PUN/2017 for A.Y. 2010-11. The assessee is in Cross Objection being C.O. No.25/PUN2019 for A.Y. 2010-11 challenging the decision of the ld. CIT(A) disallowing the deduction under the provisions of section 10B.

C.O. No.25/PUN/2019 – By Assessee :

9. At the first instance, we shall take up the Cross Objection filed by the assessee in C.O. No.25/PUN/2019. The assessee company derived profits from unit registered under Software Technology Park of India as a 100% Export Orient Unit ('EOU'). The unit at Pune was granted approval by the Director, STPI as 100% EOU vide approval letter dated March, 26, 2002 whereas unit at Hyderabad was granted approval by the Director, STPI as 100%

EOU vide approval letter dated May 16, 2006. Therefore, the unit at Pune has been claiming the deduction u/s 10B of the Act since A.Y. 2003-04 and unit at Hyderabad has been claiming deduction u/s 10B of the Act since A.Y. 2007-08. The provisions of section 10B provides for exemption of income in the case of 100% EOU subject to prescribed conditions. The Explanation (2)(iv) below the said section defines 100% EOU, as approved by the Board appointed in this behalf by the Central Government u/s 14A of Industrial Development and Regulation Act, 1951. The assessee company was of the opinion that the registration with STPI is equivalent to an approval envisaged under the above said Explanation. The Assessing Officer, during the course of assessment proceedings, examined the claim and satisfied himself as to fulfilment of the conditions precedent for claiming deduction u/s 10B, had allowed the deduction u/s 10B of the Act. During the course of proceedings before the ld. CIT(A), the ld. CIT(A) held that the appellant was not eligible for deduction u/s 10B in the absence of an approval by the Board appointed by the Central Government under this section 14 of Industrial Development and Regulations Act, 1951. However, he allowed the deduction u/s 10A of the Act.

10. Being aggrieved by the decision of the ld. CIT(A), assessee company in Cross Objection challenging the correctness of the findings of the ld. CIT(A) denying the benefit of deduction u/s 10B of the Act.

11. It is contended before us that the ld. CIT(A) had seriously fell in error in denying the claim for deduction u/s 10B by holding that the assessee is a merely registered as 100% EOU under STPI scheme, on the ground that there is no approval by the Board appointed by the Central Government u/s 14 of Industrial Development and Regulations Act, 1951. It is also contended that the registration under the STPI is sufficient compliance to enable the assessee company to claim deduction u/s 10B, as all approvals issued by the STPI director have authority of inter ministerial standing committee, the approval of STPI directors is same as Board's approval as required under the Explanation 2(iv) of section 10B of the Act. The ld. Counsel also placed reliance on the decision of the Ahmedabad Bench of the Tribunal in the case of DCIT vs. M/s Hitech Infosoft in ITA No.1625/Ahd/2016 for A.Y. 2007-08 order dated 03.10.2018 and the decision of the Pune Bench of the Tribunal in the case of ITO vs. Cat Labs Pvt. Ltd. in ITA No.131/PUN/2013 for A.Y. 2009-10 order dated 26.02.2014.

12. On the other hand, ld. Sr. DR placed reliance on the orders of the lower authorities prayed that the ld. CIT(A) had rightly denied the deduction u/s 10B of the Act.

13. We heard the rival submissions and perused the material on record. The issue in the present Cross Objection relates to whether or not the benefit of exemption u/s 10B can be granted to an assessee, registered under STPI as 100% EOU in respect of profits derived from business of development of software and sale to the HSBC subsidiary companies. It is undisputed fact that both the units of the assessee company are registered under STPI as 100% EOU. There is also no dispute that all other necessary conditions precedent for availing benefit u/s 10B were complied with by the assessee company. The dispute is only with regard to whether a mere registration with STPI as 100% EOU is sufficient enough for claiming deduction u/s 10B of the Act. We find that this issue was examined by the CBDT and the CBDT issued a clarification dated 09.03.2009 as corrected by Corrigendum No.178 dated 08.05.2009, to clarify that the Board of Approval to grant the approval u/s 14 of Industrial Development and Regulations Act, 1951 has been delegated to Development Commissioner and, therefore, the same shall be considered valid for the purpose of exemption u/s 10B of

the Act. This issue was dealt by the Ahmedabad Bench of the Tribunal in the case of M/s Hitech Infosoft (supra) as follows :-

“This issue has been further clarified by Inter Ministerial Committee Communication dated 23.03.2006 issued by Secretary, Ministry of Telecommunications and Technologies. The salient features of this communication dated 23.03.2006 are reproduced as under:-

1. *Software Technology Park of India (STPI) is a society owned and administered by the Govt. of India and therefore is state under Article 12 of the Constitution of India.*
2. *The STPI Directors are duly authorized and fully empowered to issue approvals as 100% EOUs to the unit under the STP Scheme under delegated powers granted as per para 9.36 of the Handbook of Procedures (Vol.1) 1997-2002.*
3. *All the approvals issued by the STPI Directors have the authority of Inter-Ministerial Standing Committee (IMSC). The IMSC has periodically reviewed the various approvals granted by the STPI Directors in accordance with the Govt. of India guidelines/notifications. All the current approvals granted by the STPI Directors are therefore, deemed to be valid.”*

14. Thus, it is clarified that the approvals issued by STPI directors having Board of approvals satisfied the conditions of approval as envisaged under Explanation 2(iv) of section 10B of the Act. The decision of the Hon’ble Delhi High Court in the case of CIT vs. Regency Creations Ltd., 27 taxmann.com 322 (Delhi) was held to be incorrect by the Ahmedabad Bench of the Tribunal in the case of M/s Hitech Infosoft (supra) and the recently the Hon’ble Calcutta High Court in the case of PCIT vs. Wizard Enterprises (P.) Ltd., 136 taxmann.com 235 after referring to the CBDT’s clarification dated 09.03.2009 had upheld the exemption u/s 10B even in the absence

of approval from Board of Approvals u/s 14 of Industrial Development and Regulations Act, 1951. In the above circumstances, we are of the considered opinion that the assessee is entitled for deduction u/s 10B of the Act, on registration with STPI as 100% EOU. Accordingly, the order of the Id. CIT(A) on this issue is reversed. We allow the Cross Objection filed by the assessee company.

15. Now, we shall take up the Revenue's appeal in ITA No.1464/PUN/2017 for A.Y. 2010-11.

ITA No.1464/PUN/2017 – By Revenue :

16. The Revenue challenges the decision of the Id. CIT(A) allowing the deduction u/s 10A though no such claim was made in the return of income claiming exemption under the provisions of section 80IA(10) placing reliance on the decision of Hon'ble Supreme Court in the case of Goetze (India) Ltd. vs. CIT, 157 Taxman 1 (SC). The Id. Sr. DR also relied upon the decision of the Bombay High Court in the case of EBR Enterprises vs. Union of India, 107 taxmann.com 220 (Bombay).

17. In the Cross Objection filed by the assessee company, we held that the assessee is entitled for exemption on profits derived from unit registered with STPI under the provisions of section 10B of the Act. Therefore, the issue raised by the Revenue in these grounds of

appeal no.1 to 6 had become academic. Therefore, grounds of appeal no.1 to 6 raised by the Revenue stands dismissed.

18. Ground of appeal no.7 challenges the decision of the Id. CIT(A) deleting the addition made by the Assessing Officer u/s 10B(7) r.w.s. 80IA(10) of the Act. During the course of assessment proceedings, the Assessing Officer noticed that the assessee company rendered software services to its AEs. The assessee company renders the software services from two software STPI units situated at Pune and Hyderabad. The assessee company had claimed the exemption of the profits derived from STPI under the provisions of section 10B of the Act. The Assessing Officer also observed that by virtue of arrangement entered into between the assessee company and its AEs, the assessee company made profits more than ordinary profits. In coming to this conclusion, the Assessing Officer observed that the assessee company reported profit margin of 44.29% as compared to 32.31% earned by the comparable companies in the TP study report submitted by the assessee company. Therefore, the Assessing Officer formed an opinion that the provisions of section 10B r.w.s. 80IA(10) are squarely applicable and, accordingly, computed the ordinary profits at 22.31% of the business receipts and the balance amount working out to sum of Rs.85,40,85,549/- was disallowed by the Assessing

Officer invoking the provisions of section 10B(7) r.w.s. 80IA(10) of the Act.

19. On appeal before the ld. CIT(A), the ld. CIT(A) had deleted the addition by holding that the Assessing Officer had not brought any material on record establishing any arrangement between the assessee company and its AEs resulting in more than the ordinary profits and also by considering the sample copies of invoices of employees cost etc. gave a finding that there was no such arrangement as alleged by the Assessing Officer further held that mere close connection between the assessee company and its AEs is not sufficient enough, in the absence of any arrangement between the assessee company and its AEs, to invoke the provisions of section 10B(7) r.w.s. 80IA(10). Accordingly, directed the Assessing Officer to delete addition of Rs.85,40,85,549/-.

20. Being aggrieved, the Revenue is in appeal before us vide this ground of appeal no.7.

21. It is submitted that the ALP determined under the provisions of 92CA is best indicator determining the fair market value of any goods and services. The ld. Sr. DR further submits that the close connection between the assessee company and its AEs cannot be ruled out and the requirement of existence of arrangement should be found out by over all conduct of the assessee company and its AEs.

Even in the absence of any agreement, placing reliance on the definition of section 102(1) of the Act, he submitted that the “arrangement” means any step in, or a part or whole of, any transaction, operation, scheme, agreement or understanding, whether enforceable or not, and includes the alienation of any property in such transaction, operation, scheme, agreement or understanding. Thus, it is contended that the findings of the Id. CIT(A) does not support that there is no arrangement between the assessee company and its AEs, leading to more than the profits in the hands of the assessee company.

22. On the other hand, Id. Sr. Counsel submits that the Assessing Officer ought not to have taken recourse to the provisions of section 10B(7) r.w.s. 80IA(10), inasmuch as, the assessee company’s transactions are only with foreign entities and there is no loss of revenue in India as the provisions of section 80IA(10) are applicable only in respect of profits earned in India with domestic entities. He also submits that the Assessing Officer had failed to prove the existence of any arrangement between the assessee company and its AEs, as a result of which, the assessee company made more than ordinary profits. He also placed reliance on the decision of the Hon’ble Karnataka High Court in the case of CIT vs. H.P. Global Soft Ltd., 342 ITR 263 (Kar.) He further submitted that in the

absence of any material on record to indicate that the course of business is so arranged, to inflate profits, the Assessing Officer was not justified in invoking the provisions of section 10(7) of the Act. He also submitted that in the absence of any material on record to show that the profits derived by the assessee company are more than the ordinary business, the abnormal high profits were due to the extraordinary arrangement between the assessee and its foreign AEs, the provisions of section 10(7) cannot be invoked. Mere extraordinary profits cannot lead to the conclusion that there is an arrangement between the assessee company and its AEs.

23. We have heard the rival contentions and perused the material on record. The issue in the present grounds of appeal relates to the restriction of the amount of deduction u/s 10B invoking the provisions of sub-section (7) of section 10B r.w.s. 80IA(10) of the Act. The provisions of sub-section (7) of section 10B are enacted by importing the provisions of section 80IA(8) and 80IA(10) to restrict the amount of deduction u/s 10B. The provisions of section 80IA(8) and 80IA(10) empowers the AO to re-compute the profits of eligible business, as defined under the provisions of section 80IA, in case where any goods and services of eligible business are transferred for any business carried on by the assessee and vice-versa and the consideration recorded in the books of account of

eligible business does not correspond to the market value of such goods or services as on the date of transfer, in such cases, it is open to the AO to substitute the consideration recorded in the books of account by market value of goods and services. The Finance Act, 2012 has substituted the Explanation to section 80IA(8) to clarify that the market value to be arm's length price determined under the provisions of section 92F(ii) as a consequence to transfer pricing rules for domestic transactions. It is worth noting that neither the provisions of section 80IA(8) and 80IA(10) have application to the international transactions nor the Explanation appended to section 80IA as amended by the Finance Act, 2012. In the present case, indisputably, the transactions between the assessee company and its AE are international transactions as defined u/s 92B of the Act. The provisions of section 80IA(8) and 80IA(10) have been bodily lifted and incorporated into the body of provisions of section 10B(7) of the Act. The provisions of section 80IA(8) and 80IA(10) have application only in respect of domestic transactions involving transfer of goods and services of eligible business for transfer of any business carried on by the assessee and vice-versa. When the provisions of a particular section of the same Statute are incorporated in the provisions of another section, all that we have to do is to read the provisions plainly and apply the interpretation, if

any ambiguity exists. In the present case, as stated supra, the provisions of section 80IA(8) and 80IA(10) have application only in respect of domestic transactions and the language of the provisions of section 80IA(8) and 80IA(10) is very clear and offer no ambiguity as to scope of operating of said provisions, therefore, the provisions of section 10B(7) of the Act have application only in respect of domestic transactions. In the present case, admittedly there is no domestic transactions attracting the provisions of section 80IA(8) and 80IA(10).

24. Further, we find that the AO had not brought on record any material to demonstrate that the assessee company had indulged in an arrangement with its foreign AE to produce the assessee more profits than ordinarily, what profit the assessee might have earned arising out of such business, and the AO had not indicated any material evidence to disclose any such arrangement between the assessee company and its AE. The Hon'ble Karnataka High Court in the case of CIT vs. HP Global Soft Ltd. 342 ITR 263 (Kar) held that in the absence of any material indicating existence of an arrangement, the AO was not justified in invoking the provisions of section 80IA(9) analogous to provisions of sections 80IA(8) and 80IA(10). Therefore, upshot of the above discussion is that in the absence of any material demonstrating the existence of any

arrangement between the assessee and its foreign AE to produce the assessee more profits than ordinarily, what profit the assessee might have expected to arise out of such business and resort to provisions of section 10B(7) of the Act cannot be made to restrict the amount of deduction u/s 10B(7) and also provisions of section 10B have no application in respect of international transactions entered into between the assessee and its foreign AE. In the present case, the AO had not brought any material indicating the existence of an arrangement between the assessee company and its foreign AE, as a result of which more profits than ordinarily have been produced to the assessee company and therefore, the provisions of section 10B(7) r.w.s. 80IA have no application to the present case. The CIT(A) has rightly deleted the addition of Rs.85,40,85,549/- made by the Assessing Officer, we do not find any illegality or perversity in the findings of CIT(A). Accordingly, the appeal filed by the Revenue stands dismissed.

ITA No.2348/PUN/2017

25. The Revenue in ITA No.2348/PUN/2017 has raised the following grounds of appeal:

- “1. The order of Ld. Commissioner of Income Tax (Appeals) is contrary to the law and on facts and in the circumstances of the case.*
- 2. The Ld Commissioner of Income Tax (Appeals) erred on the facts and in the circumstances of the case and in law in allowing alternate claim of the assessee for deduction u/s. 10A of the Act, once he had upheld the order of AO in denying deduction u/s. 10B.*

3. *The Ld Commissioner of Income Tax (Appeals) erred on the facts and in the circumstances of the case and in law in allowing alternate claim of the assessee for deduction u/s. 10A of the Act ignoring the provisions of section 80A(5) of the I. T. Act, 1961 which mandate that no deduction u/s. 10A would be allowable unless so claimed by the assessee in the Return of Income.*
4. *The Ld Commissioner of Income Tax (Appeals) erred on the facts and in the circumstances of the case and in law in allowing alternate claim of the assessee for deduction u/s. 10A of the Act ignoring the decision of the Hon'ble Supreme Court in the case of Goetze India Ltd vs CIT reported in 157 Taxmann 1, wherein it has been held that an assessee can amend a return filed by him for making a claim for deduction only by filing a revised return.*
5. *The Ld Commissioner of Income Tax (Appeals) erred on the facts and in the circumstances of the case and in law in allowing alternate claim of the assessee for deduction u/s. 10A of the Act ignoring decision of the Hon. Supreme Court in the case of CIT vs Shelly Products reported in 129 Taxmann 271 wherein it has been held that the assessing authority may grant relief to an assessee if an assessee by mistake or inadvertence or on account of ignorance, included in his income any amount, which is exempted from payment of income-tax, or is not income within the contemplation of law, which is clearly not established in this case.*
6. *On the facts & circumstance of the case, the learned Commissioner of Income Tax (Appeals) grossly erred in ignoring the section 10A(5) of the Act as per which deduction u/s 10A cannot be allowed unless report of an accountant is furnished in prescribed Form No.56F certifying that deduction has been correctly claimed as per law in this case, Form No.56F has been filed on 26/10/2016 which is beyond the prescribed date as Form No.56F was not filed with the Return of Income. Claiming deduction u/s. 10B in original return by filing Form No. 56G and making alternate claim u/s. 10A by filing Form No. 56F cannot be permitted.*
7. *The Ld CIT(A) has erred in law and on the facts and in the circumstances of the case in directing the AO to delete the addition made on account of disallowance under section of Rs.1,13,15,18,134/- without appreciating the fact that the assessee company has earned substantial excessive profits as determined by the Assessing Officer in his assessment order.*
8. *For these and such other grounds as may be urged at the time of hearing, the order of the Ld. CIT(A) may be vacated and that of the AO restored.*
9. *The appellant craves to add, amend, alter or delete any of the above ground of appeal during the course of appellate proceedings before the Hon'ble Tribunal.*

26. The grounds of appeal No.1, 8 and 9 are general in nature hence, does not require adjudication.

27. The grounds of appeal No.2 to 6 challenges the correctness of decision of CIT(A) in holding that the assessee is entitled for deduction u/s 10A. The issue raised in the present grounds of appeal becomes academic in view of the fact that in the appeal filed by the assessee in ITA No.2402/PUN/2017 we held that the assessee is entitled for deduction u/s 10B of the Act. Thus, these grounds of appeal No.2 to 6 stands dismissed.

28. The ground of appeal No.7 challenges the correctness of decision of CIT(A) in deleting the addition made by the AO u/s 10B r.w.s. 80IA of the Act. This identical issue was dealt by us in the earlier years in the appeal filed by the assessee in ITA No.2402/PUN/2017. For the reason stated therein, this ground of appeal stands dismissed.

29. In the result, CO of assessee is allowed and the appeals of Revenue are dismissed.

Order pronounced on this 30th day of August, 2022.

Sd/-
(S. S. VISWANETHRA RAVI)
JUDICIAL MEMBER

Sd/-
(INTURI RAMA RAO)
ACCOUNTANT MEMBER

पुणे / Pune; दिनांक / Dated : 30th August, 2022.
Sujeet/ GCVSR

आदेश की प्रतिलिपि अग्रेषित / Copy of the Order forwarded to :

1. अपीलार्थी / The Appellant.
2. प्रत्यर्थी / The Respondent.
3. The CIT(A) concerned.
4. The Pr. CIT concerned.
5. विभागीय प्रतिनिधि, आयकर अपीलीय अधिकरण, "A" बेंच,
पुणे / DR, ITAT, "A" Bench, Pune.
6. गार्ड फ़ाइल / Guard File.

आदेशानुसार / BY ORDER,

// True Copy //

Senior Private Secretary
आयकर अपीलीय अधिकरण, पुणे / ITAT, Pune.