

IN THE INCOME TAX APPELLATE TRIBUNAL
DELHI BENCHES 'D' , NEW DELHI

BEFORE SHRI RAMIT KOCHAR, ACCOUNTANT MEMBER
AND
SHRI RAJ KUMAR CHAUHAN, JUDICIAL MEMBER

ITA No.3786/Del/2023
Assessment Year : 2021-22

CBRE Limited,
4TH Three Exchange Square
Hongkong

v. ACIT,
International Taxation Circle-1(2)(1),
Civic Centre, New Delhi-110002

PAN: AAEECC1557F

(Appellant)

(Respondent)

Assessee by	:	Shri Jaskaran Singh, CA
Revenue by	:	Shri M.S. Nethrapal, CIT, DR
Date of Hearing	:	14.01.2026
Date of Pronouncement	:	14.01.2026

ORDER

PER RAMIT KOCHAR, AM:

This appeal in ITA No.3786/Del/2023 for AY 2021-22 filed by the Assessee has arisen from the assessment order dated 30th October, 2023 passed by learned Assessing Officer u/s 143(3) r.w.s. 144C(13) of the Income Tax Act, 1961 (hereinafter referred to as 'the Act')(DIN & Order No. ITBA/AST/S/143(3)/2023-24/1057489905(1)). The assessee is incorporated in Hongkong. There were rectification proceedings u/s 154 which culminated into an rectification order dated 03.04.2025 passed by the AO u/s 154 , wherein

income assessed stood rectified to Rs. 4,96,62,718/-(DIN & Order No. ITBA/REC/S/154_1/2025-26/1075458543(1))

2. This appeal came up for hearing before the Bench on 13th January, 2026, wherein it was brought to the attention of the Bench by Id. Counsel for the assessee that the assessee has availed the Direct Tax Vivad Se Vishwas Scheme, 2024, and has filed necessary declarations with the Department . It was submitted that Now Form-4 dated 14.07.2025 (DIN/Acknowledgment No. 320915661140725) is also issued by the department which is order for full and final settlement of tax arrear under Sub-Section (2) of Section 92 read with Section 93 of Finance (No. 2) Act, 2024(Under the Direct Tax Vivad Se Vishwas Scheme, 2024). The copy of the same is placed on record by Id. Counsel for the assessee , which is now placed on record in file. The Id. CIT-DR was asked to verify the same and to submit comments of the department . Hence, the appeal was posted for hearing before the Bench for 14.01.2026 .

3. When this appeal came up for hearing before the Bench on 14.01.2026, the Ld. counsel for the assessee reiterated before the Bench that the assessee has availed the Direct Tax Vivad Se Vishwas Scheme, 2024 , and has filed necessary declarations with the Department. It was submitted that the Department has now accepted the declarations filed by the assessee under the Direct Tax Vivad Se Vishwas Scheme, 2024 , and has issued Form No.4 (DIN/acknowledgement No.320915661140725 dated 14th July, 2025). A copy of

the same is placed on record by the Ld. Counsel for the assessee . The ld. Counsel for the assessee prayed for the dismissal of the appeal as withdrawn on the grounds of availment of VSVS, 2024 scheme.

4. The Ld. CIT-DR, after verification of the records, submitted that the Department has no objection if the appeal of the assessee is dismissed on account of availing of the Direct Tax Vivad Se Vishwas Scheme, 2024.

5. Thus, after considering the contentions of both the parties and keeping in view that the assessee has availed VSVS, 2024 scheme , department having already issued Form No.4 under the scheme and department having no objection to dismissal of this appeal, the assessee's appeal in ITA No.3786/Del/2023 for AY 2021-22 stands dismissed as withdrawn on account of availing of Direct Tax Vivad Se Vishwas Scheme, 2024. We order accordingly.

6. In the result, the appeal of the assessee is dismissed.

Order pronounced in the open court on 14.01.2026 in the presence of both the parties, and reduced to writing and signed on 16.01.2026 at New Delhi

Sd/-
(RAJ KUMAR CHAUHAN)
JUDICIAL MEMBER

Sd/-
(RAMIT KOCHAR)
ACCOUNTANT MEMBER

Dated: 16th January, 2026.

dk

Copy forwarded to:

1. Appellant
2. Respondent
3. CIT
4. CIT(A)
5. DR

Asstt. Registrar, ITAT, New Delhi