

**IN THE INCOME TAX APPELLATE TRIBUNAL BENCH-RANCHI**  
**VIRTUAL HEARING AT KOLKATA**

**Before Shri Sonjoy Sarma, Judicial Member  
and Shri Ratnesh Nandan Sahay, Accountant Member**

**I.T.A. No.284/Ran/2024**

Assessment Year: 2016-17

**Jaiswal Steel Industries Pvt. Ltd. ....Appellant**  
Dropadi Bhawan, Station Road,  
Jugsalai, Jharkhand- 831006.  
[PAN: AABCJ4471C]

vs.

**ITO, Ward-2(1), Jamshedpur.....Respondent**

**Appearances by:**

Shri Akshay Ringasia, AR, appeared on behalf of the appellant.

Shri Sumit Dasgupta, appeared on behalf of the Respondent.

Date of concluding the hearing : January 15, 2026

Date of pronouncing the order : January 19, 2026

**ORDER**

**Per Sonjoy Sarma, Judicial Member:**

This appeal filed by the assessee is directed against the order of the NFAC, Delhi (hereinafter referred to as "CIT(A)") dated 02.04.2024 passed under Section 250 of the Income-tax Act, 1961 (hereinafter referred to as the "Act").

2. Brief facts of the case are that the assessee is a company, filed its return of income for the assessment year 2016-17 declaring income as per return. Subsequently, reassessment proceedings were initiated and the assessment was completed by the Assessing Officer under section 147 read with section 143(3) of the Act. While completing the reassessment, the Assessing Officer determined the total income of the assessee at ₹46,66,974 after adjusting carry forward business loss of ₹1,46,68,519. Further, additions aggregating to ₹1,93,35,493 were made

on account of unexplained money under section 69A, unexplained investment under section 69 and disallowance of depreciation.

3. Aggrieved by the assessment order, the assessee preferred an appeal before the Commissioner of Income Tax (Appeals). However, the appeal was dismissed by the Ld. CIT(A) due to non-compliance on various dates of hearing.

4. Before the Tribunal, the assessee submitted that the Ld. CIT(A) dismissed the appeal without properly considering the submissions and that the matter was decided ex parte. It was contended that although notices were issued, the assessee could not effectively represent its case, and therefore the appellate order was passed in violation of the principles of natural justice.

5. We, after hearing the submissions and perusing the material available on record, it is observed that the assessee did not get a reasonable opportunity of being heard before the CIT(A). Therefore, in the interest of justice, the order of the CIT(A) is set aside and the matter is restored to the file of the Ld. CIT(A) for fresh adjudication after providing due opportunity to the assessee. Accordingly, the appeal of the assessee is allowed for statistical purposes.

6. In the result, the appeal of the assessee is allowed for statistical purposes.

***Kolkata, the 19<sup>th</sup> January, 2026.***

Sd/-  
**[Ratnesh Nandan Sahay]**  
**Accountant Member**

Sd/-  
**[Sonjoy Sarma]**  
**Judicial Member**

Dated: 19.1.2026.

RS

*Copy of the order forwarded to:*

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

//True copy//

By order

Assistant Registrar, Kolkata Benches