

आयकर अपीलीय अधिकरण, हैदराबाद पीठ  
**IN THE INCOME TAX APPELLATE TRIBUNAL**  
Hyderabad 'B' Bench, Hyderabad  
श्री विजय पाल राव, उपाध्यक्ष एवं श्री मधुसूदन सावडिया, लेखा सदस्य के समक्ष ।

**BEFORE SHRI VIJAY PAL RAO, VICE PRESIDENT  
AND  
SHRI MADHUSUDAN SAWDIA, ACCOUNTANT MEMBER**

**M.A. No.98/Hyd/2025**

(In आयकर अपीलसं./I.T.A. No.1320/Hyd/2024  
(निर्धारणवर्ष/ Assessment Year:2021-22)

INVESCO (INDIA) (P) Ltd, Hyderabad. PAN: AACCH8216L	VS.	Dy. CIT, Circle-2(1), Hyderabad.
(अपीलार्थी/ Appellant)		(प्रत्यर्थी/ Respondent)

करदाताकाप्रतिनिधित्व/ Assessee Represented by	:	Shri Kranthi Palivela, CA
राजस्वकाप्रतिनिधित्व/ Department Represented by	:	Dr. Sachin Kumar, Sr. AR
सुनवाईसमाप्तहोनेकीतिथि/ Date of Conclusion of Hearing	:	06/02/2026
घोषणा की तारीख/ Date of Pronouncement	:	11/02/2026

**ORDER**

**PER MADHUSUDAN SAWDIA, A.M.:**

This Miscellaneous Application has been filed by the assessee under section 254(2) of the Income Tax Act, 1961 ("the Act") seeking rectification of mistake apparent from record in the order of this Tribunal passed in ITA No.1320/Hyd/2024 for the assessment year 2021-22 dated 08.10.2025.

2. At the outset, the Learned Authorised Representative (“Ld. AR”) submitted that in para no. 16 of the impugned order, the Tribunal has dealt with and adjudicated the issue relating to inclusion of certain companies in the list of comparables. However, at two places in the said paragraph, due to an inadvertent typographical error, the word “exclusion” has been mentioned instead of “inclusion”. It was submitted that this error is apparent on the face of the record and requires rectification under section 254(2) of the Act. Accordingly, it was prayed that para no. 16 of the Tribunal’s order be suitably rectified.

3. Per contra, the Learned Departmental Representative fairly submitted that he has no objection to the rectification sought by the assessee.

4. We have considered the rival submissions and perused the material on record. On verification, we find that the Tribunal, while deciding the comparability issue in para no. 16 of the impugned order, intended to adjudicate upon the inclusion of certain companies in the list of comparables. However, at two places in the said paragraph, the word “exclusion” has been inadvertently used, which is inconsistent with the context, reasoning, and conclusion recorded therein. Such inadvertent use of an incorrect word constitutes mistake apparent from record, which is rectifiable under section 254(2) of the Act, without involving any re-appreciation of facts or review of the decision. Therefore, we deem it fit to rectify the impugned order to such limited extent. Accordingly, the para no. 16 of the Tribunal’s order dated 08.10.2025 in ITA No.1320/HYD/2024 is hereby substituted with the following paragraph:

“16. Under ground no.8, the assessee is seeking **inclusion** of the Iservices India Pvt. Ltd, Cheers Interactive India Pvt. Ltd. Maa Business Solutions Pvt. Ltd, R Systems International Ltd and Virinchi Ltd. However, the Ld. AR stated that the assessee is not pressing the **inclusion** of R Systems International Pvt. Ltd. With respect to inclusion of Iservices India Pvt. Ltd., the Ld. AR drew our attention to page no.35 of the order of the Ld. TPO, where the company was excluded by the Ld. TPO on the reasoning that it fails the RPT filter. However, according to the Ld. AR, this finding is factually incorrect. Referring to the related party disclosure of

audited financial statements of Iservices, placed at page nos. 2269 and 2270 of the paper book, it was pointed out that the total related party transactions during the year Rs.40,56,000/-(Rs.3,60,000/- Rs. 36,96,000/-). He further submitted that the total turnover of the company is Rs. 12,90,56,540/-. Therefore, the RPT works out to approximately 3% of turnover, which is well within the 25% threshold prescribed. It was contended that once the RPT filter is correctly applied, Iservices India Pvt. Ltd. passes the test and are therefore deserves to be included in the list of comparables. Accordingly, the Ld. AR prayed for a direction to the Ld. AO/TPO to include Iservices India Pvt. Ltd. in the final set of comparables.”

4.1 Except for the above rectification, all other findings and conclusions recorded in the order of the Tribunal dated 08.10.2025 shall remain unchanged.

5. In the result, the Miscellaneous Application filed by the assessee is allowed.

Order pronounced in the open court on 11<sup>th</sup> February, 2026.

<b>Sd/- (VIJAY PAL RAO) VICE PRESIDENT</b>	<b>Sd/- (MADHUSUDAN SAWDIA) ACCOUNTANT MEMBER</b>
--	---

Hyderabad, dated 11/02/2026.

OKK/sps

**आदेशकीप्रतिलिपिअग्रेषित/ Copy of the order forwarded to:-**

निर्धारित/ The Assessee	:	Invesco (India) (P) Ltd, 15 <sup>th</sup> Floor, B-6 North Tower, Divyasree Orion SEZ, Gachibowli SO, Serilingampally-500032.
राजस्व/ The Revenue	:	Dy. CIT, Circle-2(1), Signature Towers, Hyderabad-500084.
		The Principal Commissioner of Income Tax, Hyderabad.
		विभागीयप्रतिनिधि, आयकरअपीलीयअधिकरण /DR,ITAT, Hyderabad.
		The Commissioner of Income Tax
		गार्डफाईल / Guard file

आदेशानुसार / BY ORDER

Sr. Private Secretary  
ITAT, Hyderabad.