

आयकर अपीलीय अधिकरण, 'सी' न्यायपीठ, चेन्नई।  
IN THE INCOME TAX APPELLATE TRIBUNAL  
'C' BENCH: CHENNAI

श्री एबी टी. वर्की, न्यायिक सदस्य एवं सुश्री पदमावती यस, लेखा सदस्य के समक्ष  
BEFORE SHRI ABY T. VARKEY, JUDICIAL MEMBER AND  
MS. PADMAVATHY.S, ACCOUNTANT MEMBER

आयकर अपील सं./ITA No.3005/Chny/2025  
निर्धारण वर्ष /Assessment Year: 2022-23

Secureinteli Technologies Pvt. Ltd.,  
81, Thirumalaisamy Street,  
New Siddhapudur,  
Coimbatore – 641 044.  
PAN: AAFCB 9383H

Vs. The Dy. Commissioner of Income  
Tax,  
Corporate Circle-1,  
Coimbatore.

(अपीलार्थी/Appellant)

(प्रत्यर्थी/Respondent)

अपीलार्थी की ओर से/ Appellant by  
प्रत्यर्थी की ओर से /Respondent by

: Mr.N.V.Narayanan, Advocate  
: Mr. Bipin C.N, CIT

सुनवाई की तारीख/Date of Hearing  
घोषणा की तारीख /Date of Pronouncement

: 12.02.2026  
: 17.02.2026

आदेश / ORDER

PER PADMAVATHY.S, A.M:

This appeal by the assessee is against the order of the Commissioner of Income Tax (Appeals)/National Faceless Appeal Centre (NFAC), Delhi, (in short "CIT(A)") passed u/s. 250 of the Income Tax Act, 1961 (in short "the Act") dated 26.08.2025 for Assessment Year (AY) 2022-23. The grounds raised by the assessee pertain to the issue of addition towards share premium.

2. The assessee is company and filed the return of income for AY 2022-23 on 07.11.2022 declaring total income of Rs.1,66,03,040/-. During the year under consideration, the assessee has issued 1,43,360 shares whose face value

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is Rs.10/share at a premium of Rs.270.50/share to M/s.Accel Limited. The Assessing Officer (AO) called on the assessee to furnish the valuation report in support of the valuation of shares. Since the assessee did not furnish any further details, the AO completed the assessment by adding the entire premium amount as addition u/s.56(2)(viib) of the Act. Aggrieved the assessee filed further appeal before the CIT(A). The CIT(A) upheld the addition stating that the valuation report furnished by the assessee before him, is that of a different entity M/s.Bizbarta Technologies India Pvt Ltd. The assessee is in appeal before the Tribunal against the order of the CIT(A).

3. We heard the parties and perused the material on record. The AO made an addition u/s.56(2)(viib) towards shares issued at a premium for the reason that the assessee has not substantiated the premium with a valuation report. The CIT(A) upheld the addition on the ground that the valuation report furnished by the assessee pertain to a different entity. During the course of hearing the ld AR submitted that name of the assessee company is changed from M/s.Bizbarta Technologies India Pvt Ltd. to the present name i.e. Secureinteli Technologies Pvt. Ltd. The ld AR in this regard submitted the certificate incorporation issued in the present name of the assessee stating that the name has undergone change. The ld AR also submitted that the assessee furnished the valuation report in the erstwhile name of the assessee which has been rejected by the CIT(A) stating that the valuation report is that of a different entity. From the perusal of the records and the findings of the CIT(A), it is clear that the CIT(A) has rejected the valuation report submitted by the assessee based on the misunderstood fact and that the valuation report submitted in the name of M/s.Bizbarta Technologies India Pvt Ltd is that of the assessee. Accordingly we are of the view that the CIT(A) is not correct in

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rejecting the valuation report. Considering that the valuation report was not examined on merits by the lower authorities, we are inclined to give one more opportunity to the assessee to submit the report. Accordingly we are remitting the appeal back to the AO with a direction to consider the valuation report submitted by the assessee justifying the share premium and decide the correctness of the claim in accordance with law. The assessee is directed to submit the valuation report and other relevant documents as may be called for and cooperate with assessment proceedings. It is ordered accordingly.

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

*Order pronounced on 17<sup>th</sup> day of February, 2026 at Chennai.*

*Sd/-*  
**(एबी टी. वर्की)**  
**(ABY. T. Varkey)**

**न्यायिक सदस्य / Judicial Member**

*Sd/-*  
**(पदमावती यस)**  
**(Padmavathy.S)**

**लेखा सदस्य /Accountant Member**

चेन्नई/Chennai, दिनांक/Dated: 17<sup>th</sup> February, 2026.

EDN, Sr. P.S

आदेश की प्रतिलिपि अग्रेषित/**Copy to:**

1. अपीलार्थी/Appellant
2. प्रत्यर्थी/Respondent
3. आयकर आयुक्त/CIT, Chennai/Madurai/Coimbatore/Salem
4. विभागीय प्रतिनिधि/DR
5. गार्ड फाईल/GF