

**IN THE INCOME TAX APPELLATE TRIBUNAL,  
MUMBAI BENCH "C", MUMBAI**

**BEFORE SHRI NARENDER KUMAR CHOUDHRY, JUDICIAL MEMBER  
And  
SHRI PRABHASH SHANKAR, ACCOUNTANT MEMBER**

**ITA No.7163/M/2025  
Assessment Year: 2015-16**

<b>International Reinsurance and Insurance Consultancy and Broking Services Private Limited, 45, TATA Colony, G.D Ambedkar Marg, Best Staff Quarters S.O, Badgi, Mumbai, Maharashtra - 400012.</b>	Vs.	<b>DCIT, Circle 6(1)(2), 264, Aayakar Bhawan, M.K.Marg, New Marine Lines, Mumbai, Maharashtra - 400020.</b>
(Appellant)		(Respondent)

**PAN: AAACI 2859 J**

**Present for:**

Assessee by : Shri.Atul Suraiya, CA  
Revenue by : Shri.Virabhadra Mahajan, (SR.D.R)

Date of Hearing : 28.01.2026  
Date of Pronouncement : 09.03.2026

**O R D E R**

**Per:Narender Kumar Choudhry, Judicial Member:**

This appeal has been preferred by the Assessee against the order dated 13.09.2025, impugned herein, passed by the National Faceless Appeal Centre (NFAC)/Ld. Commissioner of Income Tax (Appeals) (in short Ld. Commissioner) u/s 250 of the Income Tax Act, 1961 (in short 'the Act') for the A.Y. 2015-16.

2. In this case, the Assessing Officer, vide Assessment Order dated 13.11.2017 u/s.143(3) of the Act, made the additions of Rs.23,503/- and 6,49,078/- on account of disallowances made qua club expenses and Annual Information Return (AIR) mismatch, respectively. The Assessee being aggrieved and by filing first appeal challenged the said additions before the Ld. Commissioner, who vide impugned order though deleted

the addition of Rs.23,503/- made on account of disallowance of club expenses, however, sustained the addition of Rs.4,57,120/- to the extent of **Rs.1,39,743/- + Rs.52,216/-**. However, in the conclusion mentioned the following result: -

**"5.Conclusion: - In the result, the appeal of the Appellant is dismissed.**

**3.** The Assessee before us has claimed that before the Ld. Commissioner, it has already filed a rectification application u/s. 154 of the Act, on dated 03.10.2025 inter-alia challenging the merits of the case and/or sustaining the addition in part and therefore it intends to continue with such rectification application in the context of the merits of the case and thus,not agitating the addition, sustained on merit. Thus, in view of above stand taken by the Assessee, the addition sustained, need no adjudication by this Court.

**4.** However, the Assessee agitating the sole grievance, which relates to the conclusion mentioned by the Ld. Commissioner in the impugned order, as **"dismissal of the Assessee's Appeal"**, whereas it is a fact that the Ld. Commissioner has partly allowed the claim of the Assessee by deleting the addition of Rs.23,503/- on account of club fees and expenses in total and the addition of Rs.4,57,120/- in respect of mismatch in Annual Information Return (AIR), in part and therefore, we are in agreement with the Ld. Counsel for the Assessee that the result of the Appeal by way of impugned order, would be as under:

**"Conclusion: - In the result, the Appeal of the Assessee is partly allowed".**

**5.** Thus, para No.5 of the impugned order, is rectified accordingly with the direction that result of the Assessee's appeal decided by the Ld. Commissioner, be read as under.

**"Conclusion: - In the result, the Appeal of the Assessee is partly allowed".**

6. In the result, the Assessee's Appeal is partly allowed.

**Order pronounced in the open court on 09.03.2026.**

**Sd/-**  
**(PRABHASH SHANKAR)**  
**ACCOUNTANT MEMBER**

**Sd/-**  
**(NARENDER KUMAR CHOUDHRY)**  
**JUDICIAL MEMBER**

M. Ranganath Vitthal  
Sr. Private Secretary.

Copy to: The Appellant  
The Respondent  
The CIT, Concerned, Mumbai  
The DR Concerned Bench

//True Copy//

By Order

Dy/Asstt. Registrar, ITAT, Mumbai.