

THE CTC NEWS

Monthly Newsletter of The Chamber of Tax Consultants

(For Private Circulation - Members Only)



“ True Leaders Always Practice the three R's: Respect for Self, Respect for Others, Responsibility for all their Actions. ”

-Anonymous

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Note : All the events will be held through virtual platform (Zoom App)

Kindly enrol at the earliest to avoid disappointment. Participation Fees to be paid online on the website : www.ctconline.org

Due to lock down, The Chamber's office is not fully functional.

If members have any query, kindly contact the following staff members.

Hitesh G. Shah : Chief Manager-9821889249 | Pradeep Nambiar - Dy Manager-Events-8080254129
Bindu Mistry : Dy Manager-Technical - 9637692312 Manisha Kasbe : Dy Manager- Accounts - 8104816841

RENEWAL NOTICE – 2020-21

Dear Members,

SUB: PAYMENT OF ANNUAL MEMBERSHIP FEES FOR 2020-21

1st September, 2020

It's our privilege to have been of service to you over the years. We truly appreciate and value your association. It's time to renew annual membership and subscription of The Chamber's Journal, Study Group and Study Circle Meetings and other subscription of The Chamber of Tax Consultants ("The Chamber"). The renewal fees for Annual Membership, Study Group and Study Circle and other Subscription for the financial year 2020-21 falls due for payment on 30th September, 2020. We thank you for your subscription. Your involvement is important and very much appreciated. We hope you will always continue to support The Chamber in its activities and growth as done in the past.

Thanking You,

For The Chamber of Tax Consultants

CA Parag S. Ved

Hon. Treasurer

Sr. No.	Particulars	Fees	GST @18%	Total
I	MEMBERSHIP			
1.	LIFE MEMBERSHIP FEES	15,000	2,700	17,700
2.	ORDINARY MEMBERSHIP FEES - YEARLY (APRIL TO MARCH)	2,500	450	2,950
3.	ADMISSION FEES - ORDINARY MEMBERSHIP	750	135	885
4.	ASSOCIATE MEMBERSHIP - YEARLY (APRIL TO MARCH)	7,500	1,350	8,850
5.	ADMISSION FEES - ASSOCIATE MEMBERSHIP	1,000	180	1,180
6.	STUDENT MEMBERSHIP - INCLUDING E-JOURNAL (APRIL TO MARCH)	500	90	590
II	CHAMBER'S JOURNAL SUBSCRIPTION - YEARLY (HARD COPIES)			
1.	JOURNAL SUBSCRIPTION - LIFE MEMBER	1,350	0	1,350
2.	JOURNAL SUBSCRIPTION - NON MEMBER	2,500	0	2,500
3.	JOURNAL SUBSCRIPTION - STUDENT MEMBER	1,000	0	1,000
III	CHAMBER'S E-JOURNAL SUBSCRIPTION (SOFT COPIES)			
1.	E-JOURNAL SUBSCRIPTION - LIFE MEMBERS (YEARLY)	700	126	826
2.	E-JOURNAL SUBSCRIPTION - NON MEMBERS (YEARLY)	1,000	180	1,180
3.	E-JOURNAL SUBSCRIPTION - SINGLE JOURNAL	200	36	236
IV	ITJ SUBSCRIPTION			
1.	INTERNATIONAL TAX JOURNAL SUBSCRIPTION	1,400	0	1,400
V	STUDY CIRCLES & STUDY GROUPS (RENEWAL)			
1.	STUDY GROUP (DIRECT TAXES)	2,400	432	2,832
2.	STUDY CIRCLE (DIRECT TAXES)	2,000	360	2,360
3.	STUDY CIRCLE (INTERNATIONAL TAXATION)	1,800	324	2,124
4.	STUDY CIRCLE (INDIRECT TAXES)	2,250	405	2,655
5.	STUDY CIRCLE (ALLIED LAWS) (REFER NOTE 1 BELOW)	1,500	270	1,770
6.	SELF AWARENESS SERIES	1,000	180	1,180
7.	INTENSIVE STUDY GROUP ON DIRECT TAX	2,000	360	2,360
8.	FEMA STUDY CIRCLE	1,800	324	2,124
9.	PUNE STUDY GROUP	3,500	630	4,130
10.	BENGALURU STUDY GROUP	4,200	756	4,956
11.	HYDERABAD STUDY GROUP	11,000	1,980	12,980

(Note: 10% Discount applicable for the registration of 3 or more Study Circles & Study Groups)

Notes:

- The Managing Council has decided to extend rollover benefit for one year to the Members of the Allied Laws Study Circle. (Accordingly those Members who have enrolled for this Study Circle in F.Y. 2019-20, need not renew their subscription for F.Y. 2020-21)
- 10% Discount applicable for the registration of 3 or more Study Circles & Study Groups.
- Members are requested to visit website www.ctconline.org for online payment.
- Payments should be made by Account Payee Cheque/Demand Draft in favour of "THE CHAMBER OF TAX CONSULTANTS". Outstation members are requested to send payments only by "Demand Draft or At Par Cheque". Members who are paying by NEFT are requested to share the UTR NO for the payment done.
- A consolidated Cheque/Draft may be sent for all payments.
- Please also update your Mobile number & e-mail address to ensure receipt of regular updates on activities of The Chamber.
- Please write your full name on the reverse of Cheque/DD.
- Kindly pay your membership fees by 30th September, 2020 for uninterrupted service of the Chamber's Journal.
- Members are requested to download the Renewal Form from Chamber's website www.ctconline.org
- Renewal Notices are also sent separately and members are requested to fill up the same and send it to The Chamber's office along with the cheque.
- Renewal Notice contains entire information of Members as per CTC database. In case of any change in information of Member as shown in form, kindly provide updated information along with the form.

DIRECT TAXES

Chairman: Dinesh Poddar | **Co-Chairman:** Ashok Mehta | **Vice-Chairman:** Abhitan Mehta
Convenors: Chintan Gandhi, Nimesh Chothani, Viraj Mehta | **Advisor:** Mahendra Sanghvi

Intensive Study Group Meeting (For ISG Members Only)

Day & Date:
 Thursday, 24th Sep., 2020
Time:
 6.00 p.m. to 8.00 p.m.

Sr. No.	Topic	Group Leader
1	Recent Important Direct Tax Decisions	CA Abhitan Mehta

Recent Developments in TDS & TCS provisions under the Income-tax Act

Day & Date:
 Tuesday, 22nd September, 2020
Time:
 06.00 p.m. to 08.00 p.m.

Withholding tax under the provisions of Direct Tax Law is a topic which is dealt with very frequently by almost all tax professionals. With a series of changes in Tax Deduction at Source [TDS] and Tax Collection at Source [TCS] regime enacted by the Finance Act, 2020, it becomes imperative for professionals to remain abreast with such

provisions, particularly so in these fast-changing times and changing business dynamics.

With a view to understand the subject in detail, the Direct Tax Committee has organized a meeting in web mode on the subject.

Sr. No.	Speaker
1	CA Atul Suraiya

Workshop on Practical and Legal Issues in Tax Audit

Day & Date:
 Wednesday, 16th and
 Thursday, 17th September,
 2020
Time:
 06.00 p.m. to 08.00 p.m.

Tax Audit is something which is very close to a Chartered Accountant ('CA') as it remains in the exclusive domain of a CA. The Income-tax Department also heavily rely upon the information furnished by the CA in the tax-audit report. As a result, Form 3CD undergoes constant changes so as to get more and more relevant information for the Department.

reporting under various clauses of the tax audit report. Further, the challenges faced by professionals on account of Covid, making the tax audit assignment more challenging and invite different approach to conclude the audit efficiently.

With a view to refresh ourselves, the Direct Tax Committee has organized a workshop for clause-by-clause analysis of the Tax audit report. The details of the workshop are as under:

Sr. No.	Topics	Speakers
1	Tax Audit - It would cover clause by clause analysis with reporting requirements under clause 1 to 12, 15 to 20 and 22 to 30 of Form 3CD, legal issues in applicability of tax audit u/s 44AB, 44AD and 44ADA, in presumptive taxation cases and calculation of limits, e-filing issues, Tax Audit Documentation, and relevant recent judicial pronouncements dealing with the disclosure requirement of the Tax Audit Report	Speaker – CA Ashok Mehta Speaker – CA Gopal Bohra Chairman – CA Mahendra Sanghvi
2	Tax Audit - It would cover clause by clause analysis with reporting requirements under clause 13 (ICDS), 14, 21 and 30A to 44 of Form 3CD, Tax Audit Documentation and relevant recent judicial pronouncements dealing with the disclosure requirement of the Tax Audit Report.	

Fees	
For CTC Members	₹ 300/- + ₹ 54/- (18% GST) = ₹ 354/-
Non-Members	₹ 500/- + ₹ 90/- (18% GST) = ₹ 590/-

Drafting of Deeds and Documents

Days & Dates:

Saturday, 12th September, 2020
 Friday, 18th September, 2020
 Sunday, 20th September, 2020
 Friday, 25th September, 2020
 Saturday, 3rd October, 2020

The legal profession thrives on the maxim “verba volant, scripta manent” which literally means “spoken words fly away, written words remain”. Drafting is one of the powerful instruments of legal communication. It is an art which strikingly requires knowledge of law, the ability to balance abstract as well practical issues with precision, a good grasp of the legal language and many more things.

The need of precise drafting is often felt by professionals in day to day practice. If not drafting, professionals are often approached for vetting of documents. In such scenarios, it becomes imperative for

professionals to be aware about the nitty-gritties of the drafting as well as importance of certain non-negotiable clauses.

In order to facilitate in-depth understanding of the subject, the Commercial & Allied Laws committee of the Chamber of Tax Consultants has organized a 5 day webinar series on “Drafting of Deeds and Documents”. These webinars not only intend to sharpen legal knowledge but also aim to nurture drafting skills among professionals with the help of eminent faculties.

Sr. No.	Days & Dates	Time	Topics	Speakers
1	Saturday, 12th September, 2020	03.00 p.m. to 05.00 p.m.	Overview of drafting (Indian Contract Act and Specific Relief Act)	Mr. Parimal Shroff, Advocate and Solicitor
2	Friday, 18th September, 2020	5.00 p.m. to 7.00 p.m.	Real estate contracts and conveyancing – Part 1 (Conveyance, Development agreement and JDA)	Mr. Mahesh Shah, Solicitor
3	Sunday, 20th September, 2020	11.00 a.m. to 1.00 p.m.	Real estate contracts and conveyancing – Part 2 (Tenancy, lease, license, release and gift deed)	Mr. P. A. Jani, Advocate and Solicitor
4	Friday, 25th September, 2020	5.00 p.m. to 7.00 p.m.	Shareholders agreement, franchise agreement and other commercial contracts –	Mr. Sharad Abhyankar, Partner, Khaitan & Co.
5	Saturday, 3rd October, 2020	5.00 p.m. to 7.00 p.m.	Trust Deed, LLP Deed, Partnership Deed	CA Pradip Kapasi

Fees	All Sessions	Individual Session
For Commercial & Allied Law Committee Study Circle Members	NIL	—
For CTC Members	₹ 800/- + ₹ 144/- (18% GST) = ₹ 944/-	₹ 200/- + ₹ 36/- (18% GST) = ₹ 236/-
Non-Members	₹ 1,000/- + ₹ 180/- (18% GST) = ₹ 1,180/-	₹ 300/- + ₹ 54/- (18% GST) = ₹ 354/-

Allied Law Study Circle Meeting Decoding the New Consumer Protection Act, 2019

Day & Date:

Monday, 19th October, 2020

Time:

5.00 to 7.00 pm

We are all aware that the Consumer Protection Act 2019 received the assent of the President on the 9th August, 2019. This law has introduced several new developments and concepts. The new consumer law seeks to establish a new regulatory authority known as the Central Consumer Protection Authority having wide powers.

The new act introduces a unique provision for protecting the consumers against unfair contracts by declaring them to be illegal. This act brings in

the provisions for dealing with the misleading advertisement and has also brought in its sweep the celebrity endorsers.

The Act also covers e-commerce transactions. Stringent provisions have been laid down on the product liability. It is therefore important to understand the basics of this law which has far reaching ramifications. Accordingly, Allied Law Study Circle Meeting has been planned on the above subject.

Sr. No.	Speaker
1	CS Surendra Kanstiya, Former Chairman, Consumer Guidance Society of India (CGSI)

Fees	
Members of Allied Law Study Circle	NIL
For CTC Members	₹ 200/- + ₹ 36/- (18% GST) = ₹ 236/-
Non-members of CTC	₹ 300/- + ₹ 54/- (18% GST) = ₹ 354/-

INTERNATIONAL TAXATION

Chairman: Rajesh L. Shah | **Vice-Chairman:** Kirit Dedhia, Shabbir Motorwala

Convenors: Isha Sekhri, Ronak Doshi, Kartik Mehta

FEMA Study Circle Meeting on FEMA Compliance Audit

Day & Date:
Tuesday, 8th September, 2020
Time:
06.00 p.m. to 08.00 p.m.

While auditing entities where there are international transactions, it is pertinent for the Auditor to check whether provisions of the Foreign Exchange Management Act (FEMA) have been complied with. If the provisions are not complied with then the entities may be subject to the compounding proceedings and it may have to provide

for a contingent liability. To equip the Auditors, the FEMA Study Circle of the Chamber of Tax Consultants is pleased to announce a Webinar on "FEMA Compliance Audit", the details of which is given as under:

Sr. No.	Speakers
1	CA Rajesh P. Shah
Fees	
For FEMA Study Circle Members	NIL
Others	₹ 300/- + ₹ 54/- (18% GST) = ₹ 354/-

INDIRECT TAXES

Chairman: Atul Mehta | **Vice-Chairman:** Sumit Jhunjhunwala

Convenors: Hemang Shah, Kush Vora, Keval Shah | **Advisor:** Rajiv Luthia

IDT Study Circle Meeting on Issues connected with GST Annual Return GSTR 9 & GST Audit GSTR 9C for FY 2018-19

Day & Date:
Thursday, 3rd September, 2020
Time:
04.00 p.m. to 06.00 p.m.

Group Leader	Chairman
CA Keval Shah	CA Jatin Christopher

IDT Study Circle Meeting on GST Issues in OIDAR transactions

Day & Date:
Tuesday, 6th October, 2020
Time:
04.00 p.m. to 06.00 p.m.

Group Leader	Chairman
Vinay Jain, Advocate	Mr. A. R. Krishnan

Fees	
For IDT Study Circle Members	NIL
For CTC Members	₹ 200/- + ₹ 36/- (GST) = ₹ 236/-
Non-Members	₹ 400/- + ₹ 72/- (GST) = ₹ 472/-

STUDENT

Chairperson: Varsha Galvankar | **Vice-Chairperson:** Niyati Mankad | **Vice-Chairman:** Vitang Shah

Convenors: Raj Khona, Charmi G. Shah | **Advisor:** Ajay Singh

4th The Chamber of Tax Consultants National Tax Moot Court Competition, 2020

(Jointly with Government Law College, Mumbai)

Days & Dates:
Saturday, 26th September, 2020
and Sunday, 27th September,
2020

Sessions:	All sessions/oral rounds shall be held online and shall consist of - Preliminary Round, Quarter Final Round, Semi-final Round & Final Round
Who can participate?	Any student of any recognized law college in the country
Registration Fees	₹ 1,800/- Per Team Team must consist of two speakers and one researcher
Who should attend?	Open to all
The Objective:	To give an opportunity to students of various Law Colleges from all over the country to prepare and argue on a case involving Income Tax provisions vis-à-vis General Anti-Avoidance Rule (GAAR) before Eminent Lawyers, Members of the ITAT and Judges of the High Court. In view of the ongoing pandemic, this year the moot court is being held online.
Prizes	Best Team - ₹ 13,000/- 2nd Best Team - ₹ 7,000/- Best Speaker - ₹ 4,000/- 2nd Best Speaker - ₹ 3,500/- Best Memorial - ₹ 4,000/- 2nd Best Memorial - ₹ 3,500/-

**Enrollment
Closed**

STUDENT

Chairperson: Varsha Galvankar | **Vice-Chairperson:** Niyati Mankad | **Vice-Chairman:** Vitang Shah

Convenors: Raj Khona, Charmi G. Shah | **Advisor:** Ajay Singh

Tax Audit (Recent Changes and Do's & Don'ts)

Day & Date:
Saturday 26th September, 2020
Time:
5.00 to 7.00 pm

In the present scenario for the practicing professional, the responsibility has increased manifold in terms of Auditing Functions. Cost of negligence is very high and You, students are the initial executors for conducting Tax Audit. However the questions that arise are:

- Are you equipped to carry out Tax Audit?
- Do you understand the impact of Auditing Standards for carrying out Tax Audit?

- Are you able to co-relate the understanding of Income Tax while dealing with Tax Audit?
- Are you aware about the steps of caution while preparing proper working file for tax audit?

With this objective, the Students Committee of The Chamber of Tax Consultants is pleased to announce a webinar on Tax Audit – Recent Changes and Do's & Don'ts.

Who should attend: Article Students, anyone who performs or wants to learn about Tax Audit

Sr. No.	Topic	Speaker
1	Tax Audit (Recent Changes and Do's & Don'ts)	CA Chintan Gandhi

Fees	
Student Member	NIL
All Other Participants	₹ 200 + ₹ 36 (18% GST) = ₹ 236/-

STUDY CIRCLE & STUDY GROUP

Chairman: Ashok Sharma | **Co-Chairman:** Dilip Sanghvi | **Vice-Chairman:** Sanjay Choksi
Convenors: Dinesh Shah, Dipesh Vora, Dhaval Shah | **Advisor:** Keshav Bhujle, Akbar Merchant

Study Group Meeting

Day & Date:
Sunday, 13th September, 2020
Time:
11.30 am - 1.30 pm

Sr. No.	Topic	Speaker
1	Recent Judgments under Income Tax	Mr. Vipul Joshi, Advocate
Fees		
For Study Group Members	NIL	
For CTC Members	₹ 200/- + ₹ 36/- (GST) = ₹ 236/-	
Non-Members	₹ 400/- + ₹ 72/- (GST) = ₹ 472/-	

Study Group Meeting

Day & Date:
Sunday, 11th October, 2020
Time:
11.30 am - 1.30 pm

Sr. No.	Topic	Speaker
1	Recent Judgments under Income Tax	Mr. Ajay Singh, Advocate
Fees		
For Study Group Members	NIL	
For CTC Members	₹ 200/- + ₹ 36/- (GST) = ₹ 236/-	
Non-Members	₹ 400/- + ₹ 72/- (GST) = ₹ 472/-	

HYDERABAD STUDY GROUP

Co-ordinators: Manindar Kakarla, Neelesh Vitlani, Ram Murthy T., Ravi Ladia, Samba Murthy P.

Hyderabad Study Group Meeting

Day & Date:
Saturday, 5, September, 2020
Time:
5.00 p.m. - 7.00 p.m.

Sr. No.	Topic	Speaker
1	Overview of Auditing Standards	CA Sekkhizhar Balasubramanian
Fees		
For Study Group Members	NIL	
For CTC Members	₹ 100/- + ₹ 18/- (18% GST) = ₹ 118/-	
Non-Members	₹ 200/- + ₹ 36/- (18% GST) = ₹ 236/-	

Refresher Course on Transfer Pricing 2020

Days & Dates:

Friday, 4th September, 2020
 Saturday, 5th September, 2020
 Friday, 11th September, 2020
 Saturday 12th September, 2020
 Saturday, 19th September, 2020

Tax Authorities worldwide are trying to bring consistency and transparency in Transfer Pricing (TP) Regulations. In light of enormous recent developments in the tax landscape including BEPS and MLI, TP is still one of the most critical issues faced by Corporates. Application of arms length principle remains an important principle through which Income and Expenses are justified.

The International Taxation Committee and the Delhi Chapter of the Chamber of Tax Consultants is pleased to announce the Refresher Course on Transfer Pricing 2020. This course is designed to provide conceptual clarity to the professionals desiring to commence

transfer pricing practice and will also help professionals to get themselves updated with the recent developments and procedures. This course has been spread over a period of 8 sessions to get in-depth knowledge. The focus of this course will be on both practical and theoretical aspects including Concepts of TP Audit & Documentation, Benchmarking Principles, Safe Harbour Principles, TP Assessment including DRP and also alternate dispute resolution through APA or MAP.

The Course will be addressed by experienced and expert professionals in this area.

Sr. No.	Days & Dates	Time	Topics	Speakers
1	Friday, 4th September, 2020	05.30 p.m. – 07.30 p.m.	Basic Concepts of Transfer Pricing	CA Vispi Patel
2	Saturday, 5th September, 2020	03.00 p.m. – 05.00 p.m.	Various Compliances in Transfer Pricing	CA Bhavesh Dedhia
3	Saturday, 5th September, 2020	05.30 p.m. – 07.30 p.m.	Selection of comparable – Benchmarking Exercise	CA Maulik Doshi
4	Friday, 11th September, 2020	05.30 p.m. – 07.30 p.m.	Assessment and Alternate Dispute Resolution Mechanism through APA or MAP (Effects of APA, Process and Procedure of entering into an APA, etc.), Safe Harbour Rules	Mr. Mahesh Kumar, APA, Commissioner of Income Tax
5	Saturday 12th September, 2020	10.00 a.m. – 12.00 p.m.	TP Recent issues surrounding taxable income of non-resident in India, Debatable issues in TP Assessment and Appeal Process, Secondary Adjustments, Limitation of Interest Deductions.	CA Paresch Parekh
6	Saturday, 12th September, 2020	05.30 p.m. – 07.30 p.m.	Important/ Recent Judicial Rulings on Transfer Pricing	Dr. (CA) Sunil Moti Lala (Advocate)
7	Saturday, 19th September, 2020	10.00 p.m. – 12.00 p.m.	Global Perspective on Transfer Pricing Law	CA Kunj Vaidya
8	Saturday, 19th September, 2020	04.30 p.m. – 07.30 p.m.	Panel discussion on Case Studies	Moderator - CA Vispi Patel Panelists: CA Karishma Phatarphekar CA Vijay Iyer CA Ajit Kumar Jain – Ex-IRS Officer

Fees

For CTC Members

₹ 1,250/- + ₹ 225/- (18% GST) = ₹ 1,475/-

Non-Members

₹ 1,500/- + ₹ 270/- (18% GST) = ₹ 1,770/-

IMPORTANT DECISIONS UNDER GST

By Vinay Jain & Sachin Mishra, *Advocates*

1. **Who is the recipient of service rendered by Foreign Intermediary Bank in relation to transfer of money relating to exports made by the exporters in India, the exporter on whose behalf the Indian bank acted or the Indian bank itself?**

Facts and Pleadings: M/s. State Bank of Bikaner & Jaipur (herein after referred to as 'The Appellant') is inter alia engaged in providing banking services to the importers/exporters by facilitating the settlement of payment between them for import and export of goods/services. In an export transaction from India, the exporter submits the export documents to the Appellant and informs the name and address of buyer's bank for sending the export documents against acceptance and payment of Bill of Exchange. The Appellant forwards these documents to the Foreign Bank for collection of payment from the importer. If the exporter decides to bear all the bank charges, then the Foreign Bank charges its fees from the exporter for handling of export documents and collection of export proceeds. The foreign bank charges are then recovered from the exporter by deducting the same from the amount collected from the importer. There is no agreement between the Appellant and Foreign Bank. The aforesaid settlement transactions are governed by the URC 522 and UCP 600 protocols issued by International Chamber of Commerce. A trade notice was issued in 2014 inter alia clarifying that the Banks availed the services of the Foreign Bank and were, therefore, liable to pay service tax on the bank charges/commission deducted by the Foreign Bank under the reverse charge mechanism, both before and after July 01, 2012. Based on this a SCN was issued to the Petitioner demanding service tax on foreign bank charges under Reverse Charge Mechanism

The Appellant argued that the foreign bank charges cannot be considered as 'consideration' received by the Appellant and included in the value of services. The Appellant cannot be considered as the recipient of the service provided by the Foreign Bank. The nexus between consideration (i.e. foreign bank charges) and the services provided by the Foreign Bank is established between the Foreign Bank and the exporter/importer and not between the Foreign Bank and the Appellant Bank. Accordingly, as per the Appellant, the Foreign Bank and the Appellant Bank are co-service providers to the exporters/importers.

The department argued that the Appellant being service recipient of the services provided by the Foreign Bank, the Appellant is liable to pay service tax on the aforesaid foreign bank charges under reverse charge mechanism. The department alleged that there exists a flow of service chain between the Exporter, the Appellant, the Foreign Bank and the importer, in which each of them is rendering independent service to one another, reliance was placed on CST vs Melange Developers Pvt. Ltd. 2019-TIOL-1684-CESTAT-DEL-LB. The department further alleged that the Appellant acted as guarantor for the Indian exporter in the financing of international trade, and, therefore, it cannot be a pure agent of the Indian exporter.

Judgement: The Hon'ble CESTAT held that the Appellant provides service to the exporters by sending the export documents to the bank of the importer abroad and collects payment. Thus, the role of the Appellant is to settle the payment relating to export/import. For performance of such activity, the Appellant charges service tax to the exporters. The Hon'ble CESTAT held that the Appellant cannot be said to be the recipient of service for the activities undertaken by the Foreign Banks situated outside India. The Appellant merely acts on behalf of the Indian exporter and facilitates the service. The Hon'ble CESTAT further observed that the Appellant has not paid any consideration to the Foreign Bank and, therefore, the Appellant cannot be said to be the recipient of any service by the Foreign Bank. Thus, the Hon'ble CESTAT held that since the Appellant is not the recipient of any service rendered by the Foreign Bank, there is no liability to pay service tax on a RCM. Further, the Hon'ble CESTAT relied upon the decision of Madras High Court in BGR Energy Systems Limited, 2019-VIL-574-MAD-ST, wherein the Trade Notice dated 10.2.2014 was examined and it was held that it cannot be said that the bank of the exporter in India was the recipient of service provided by the Intermediary Bank or the Foreign Bank situated in Iraq. In fact, the Indian Bank of the exporter had only facilitated the service to be rendered by the Foreign Bank for the purpose of providing Bank Guarantee on behalf of the exporter. Accordingly, it was held that the Appellant is not the recipient of the services rendered by foreign bank. Interestingly, the Hon'ble CESTAT has not commented on the question as to whether the Indian exporter is the recipient of the service.

M/s. State Bank of Bikaner & Jaipur Vs. Commissioner of Central Excise & Service Tax, Alwar, CESTAT New Delhi decided on 5.8.2020 in Final Order No. 50737/2020

2. **Whether the amended Rule 89(5) of the Central Goods and Services Tax Rules, 2017 ("CGST Rules") is ultra vires Sections 54(3) and 164(1) of the Central Goods and Services Tax Act, 2017 ("CGST Act") to the extent it excludes the input service within the ambit of inverted duty structure refund?**

Facts and Pleadings: M/s. VKC Footsteps India Pvt. Ltd. (hereinafter referred to as the "Petitioner") is inter alia engaged in manufacture and supply of goods attracting GST @ 5%. Majority of the inputs/input services used by Petitioner attracted GST at the rate of 12% / 18%, thereby resulting in accumulation of Input Tax Credit ("ITC"). By way of Notification No. 21/2018-CT, dated 18.4.2018, a revised formula was prescribed under Rule 89(5) of CGST Rules resulting in denial of refund of credit accumulated on account of "input services". Further, by way of Notification No. 26/2018-CT, dated 13.6.2018, the said formula was made effective from 1.7.2017. Aggrieved by the same, the Petitioner had challenged the validity of amended Rule 89(5) of CGST Rules as being ultra vires Section 54(3) of CGST Act in as much as it denied refund of ITC accumulated on account of "input services".

The Petitioner argued that GST being a consumption tax, tax burden is borne only by the final consumer and not the business. In order to avoid cascading effect of taxes in the form of unabsorbed excess tax on inputs with consequent increase in cost of product, a mature GST law provides for refund of accumulated unutilised excess input tax credit. Rule 89(5) of CGST Rules, under the garb of fixing formula for determining pro-rata amount of credit relatable to inverted duty structure turnover vis-à-vis total turnover, has instead, erroneously restricted the refund of ITC to inputs alone. There is nothing either in Section 54(3) of CGST Act or under proviso (ii) to said section to restrict refund to ITC on inputs. Restrictive formula prescribed in Rule 89(5) of CGST Rules, in effect, whittles down the effect of the word “any” employed in Section 54(3) of CGST Act. Such an exercise cannot be considered as a rule “for carrying out the provisions of the Act”, thereby rendering it violative of rule-making power conferred by Section 164(1) of CGST Act.

Whereas refund of unutilized ITC in respect of tax paid on input services is permitted in case of zero-rated supplies, there is no intelligible differentia supporting rejection of refund of such ITC accumulated on account of inverted duty structure alone. On this count, the amended rule is discriminatory.

The Department argued that Rule 89(5) of CGST Rules only provides the mode of calculation of refund available, and to that extent, there is no embargo placed by Section 54(3) of CGST Act. Rule-making power conferred by Section 164 of CGST Act is worded in the widest possible manner. Therefore, amendment made to Rule 89(5) of CGST Rules is intra vires the provisions of the CGST Act.

Judgement: The Hon’ble High Court held that Sub-section (3) of Section 54 of CGST Act, 2017 provides for claim of refund of “any unutilised input tax credit”. The phrase “input tax credit” is defined in Section 2(63) of CGST Act to mean the credit of input tax. The phrase “input tax” as defined in Section 2(62) of CGST Act means the tax charged on any supply of goods or services or both made to any registered person. The term “input” is defined in Section 2(59) of CGST Act to mean any goods other than capital goods, and “input service” as per Section 2(60) of CGST Act means any service used or intended to be used by a supplier. Thus, “input” and “input service” are both part of the “input tax” and “input tax credit”. Therefore, as per provisions of Section 54(3) of CGST Act, the legislature has provided that registered person may claim refund of “any unutilised input tax credit”. By way of Rule 89(5) of CGST Rules, such claim of the refund cannot be restricted only to “input”, excluding the “input services” from the purview of “input tax credit”. Moreover, clause (ii) of proviso to sub-section (3) of Section 54 of CGST Act also refers to both supply of goods or services and not only supply of goods as per amended Rule 89(5) of the CGST Rules. Intent of the government by framing the rule restricting the statutory provision cannot be the intent of law as interpreted in Circular No. 79/53/2018-GST, dated 31.12.2018. Accordingly, the Hon’ble High Court held that the Explanation (a) to Rule 89(5) which denies the refund of unutilised input tax paid on input services as part of input tax credit accumulated on account of inverted duty structure is ultra vires the provision of Section 54(3) of the CGST Act, 2017.

M/s. VKC Footsteps India Pvt. Ltd. v. Union of India and others, Gujarat High Court Judgement dated 24.7.2020 in R/Special Civil Application No. 2792 of 2019 and others.

3. Whether Section 13(8)(b) of the Integrated Goods and Services Tax Act, 2017 (“IGST Act”) which deem the place of provision of intermediary service as location of service provider is ultra vires Articles 14, 19, 265 and 286 of the Constitution of India (“Constitution”)?

Facts and Pleadings: M/s. Material Recycling Association of India (hereinafter referred to as the ‘Petitioner’) was an association comprising of recycling industry engaged in manufacture of metals and casting etc. for various upstream industries in India. The members of the association facilitated sale of recycled scrap goods in India and other countries on behalf of their foreign principals. As per Section 2(13) of the IGST Act, the members were regarded as “intermediaries” of the foreign principals. As per Section 13(8)(b) of the IGST Act, since the foreign principal (recipient of the service) is located outside India, the place of supply shall be the location of supplier of services i.e. India. Accordingly, the supply being an intra-state supply, the members were held liable to pay Central Goods and Services Tax (“CGST”) and State Goods and Services Tax (“SGST”).

The Appellants argued that the aforesaid services cannot be regarded as “intermediary services” but are “export of service” as per Section 2(6) of the IGST Act. Being a “zero-rated supply” as per Section 16(1) of the IGST Act, they are eligible to claim refund of Integrated Goods and Services Tax (“IGST”) paid in view of Section 16(2) of the IGST Act. As per Article 286(2) of the Constitution, Parliament is not authorized to legislate and artificially assign the place of supply to be within India when clearly the services are being exported out of India. The powers under Article 286(2) are confined within the scope of Article 286(1). Though the intermediary services are rendered outside India, assessee are subjected to CGST and SGST. Further, despite the recipient of services being outside India, the services are still deemed to be rendered within the state. Nature of intermediary services remains substantially same as compared to advisory services. However, the place of supply in case of advisory services is the location of the recipient. When the service remains the same, there appears to be no intelligible differentia as to why they are treated differently. Such differentiation also does not have any nexus with the object sought to be achieved. Entry 12AA of Notification No. 20/2019-Integrated Tax, dated September 30, 2019 exempts services provided by an intermediary when location of both supplier and recipient of goods is outside India. There is discrimination between cases where recipient is in India and where recipient is outside India. The provisions in the service tax regime whereby similar rules were available for intermediary services cannot be applied in GST regime since the term “recipient” is clearly defined in the GST regime which was not the case in the service tax regime. Section 13(8)(2)(b) is against the basic principle of GST being a destination based tax since the tax is leviable in India even though the services are consumed outside India. Section (13)(8)(b) of the IGST Act suffers from incurable defect of vagueness and is therefore, liable to be struck down. The Petitioner further submitted

that it contributes to tax cascading and double taxation since the same transaction would be subjected to tax as import of service in the country of the recipient of service. The section suffers from unreasonableness as it creates a deeming fiction for a clear case of export of service which is contrary to the object of GST law.

The department alleged that as per Section 13(8)(b) of the IGST Act, since the place of supply is in India, the transaction cannot be regarded as export of services since the conditions specified in Section 2(6) are not satisfied. Going by the strict interpretation of the aforesaid provisions, the question of violation of Articles 265 and 286 does not arise. The reason for deferential treatment for determining place of supply in case of an intermediary is that an intermediary provides service to both supplier and recipient, and hence, it may not be feasible to apply the general rule by prescribing one person as the recipient. The provisions in GST regime, being in consonance with the provisions in service tax regime, the determination of place of supply in case of an intermediary as location of supplier is a policy decision of the government which cannot be said to be unlawful or violative of the Constitution. Parliament has got wide amplitude to create deeming fictions under taxation matters and to levy tax thereon. Benefits accruing to exporters of services are meant for those who actually export services and not to every other entity which is directly or indirectly associated with the exporter, like an intermediary. Violation of Article 14 of the Constitution is not tenable, because one service cannot be compared with other service to justify Article 14. The challenge on lack of intelligible differentia is also not tenable since it is very much within the powers of the government to categorize goods and services for the purpose of taxation in such manner as it meets the policies and objectives of the government. There are exceptions to the default rule under Section 13(2) of the IGST Act for determining place of supply as specified in Section 13(3) to 13(12) of the IGST Act. This is within the legislative competence as the legislature is free to pick and choose the supply that it intends to tax and the manner in which it intends to tax.

Judgment: The Hon'ble High Court held that the Section 13(8)(b) of the IGST Act is framed by the Parliament in consonance with Article 246A(2) of the Constitution. The legislature thought it fit to consider the place of supply in case of "intermediary services" to be the location of the supplier of services. On a conjoint reading of Sections 2(6) and 2(13) of the IGST Act, person who is an intermediary cannot be considered as an exporter of services because he is only a broker who arranges and facilitates the supply of goods or services or both. On reading Notification 20/2019-Integrated Tax, it can be inferred that Section 13(8)(b) was enacted to levy CGST and SGST and such intermediary services therefore, are kept out of the purview of IGST. There is no distinction between the intermediary services provided by a person in India or outside India. Merely just because the invoices are raised on the person outside India with regard to the commission and foreign exchange is received in India, it would not qualify to be export of services when the place of supply is in India. There is no deeming provision in the present case as submitted by the petitioner, but instead there is a clear stipulation in the Act legislated by the Parliament to consider the location of the service provider of intermediary

to be the place of supply. Provision similar to Section 13(8)(b) existed in the service tax regime as well. Therefore, this being a consistent stand of the government, it cannot be treated as "export of services" under the IGST Act. There is no double taxation since the commission paid would not be taxable in the hands of the recipient, but on the contrary, would be entitled to get deduction of such payment by way of expenses.

M/s. Material Recycling Association of India v. Union of India & Ors. Gujarat High Court Judgment dated 24.7.2020 in R/Special Civil Application No. 13238 of 2018 and 13243 of 2018.

4. **Whether the expression "quantified" under Section 121(r) of the Finance Act, 2019 for filing of a declaration under Sabka Vishwas (Legacy Dispute Resolution) Scheme, 2019 ("SVLDRS, 2019") will also include duty liability admitted in an oral statement prior to 30.06.2019?**

Facts and Pleadings: M/s. Seventh Plane Networks Private Limited (hereinafter referred to as the 'Petitioner') has filed the present Writ challenging the rejection order whereby the declaration filed by the Petitioner under SVLDRS, 2019 was rejected on the ground that the amount of duty involved in the audit had not been quantified on or before the 30.6.2019.

According to the department that petitioner was ineligible to apply under the SVLDRS, 2019 as the amount of duty involved in the audit had not been quantified before 30.6.2019 as the expression "quantified" under Section 121(r) of the Finance Act, 2019 means a written communication of the amount of duty payable under the indirect tax enactment.

The Appellant contended that though audit memo was issued in writing on 2.7.2019, yet the petitioner had accepted the demand on disputed points on 28.6.2019. In this regard, the Petitioner relied upon para 2(v) of Circular No. 1074/07/2019-CX dated 12.12.2019 read with paras 4(a) and 10(g) of Circular dated 27.8.2019 that allow relief under SVLDRS for cases under investigation and audit where the duty involved had been admitted by the assessee/declarant in a statement on or before 30.6.2019.

Judgement: The Hon'ble High Court observed that the expression "quantified" in Section 121(r) has been extended /widened by way of para 2(v) of Circular dated 12.12.2019 read with paras 4(a) and 10(g) of Circular dated 27.8.2019. The Hon'ble High Court held that the audit in the present case was concluded on 28.6.2019 and the amount due and payable was not only determined as well as communicated to the petitioner but was also admitted by the Petitioner on 28.6.2019. Accordingly, the Hon'ble High Court was of the view that the duty liability stood admitted in an oral statement by the Petitioner before 30.6.2019 and consequently stood quantified prior to the cut-off date in accordance with the beneficial circulars dated 12.12.2019 and 27.8.2019. The Hon'ble High Court further observed that a liberal interpretation has to be given to the SVLDRS, 2019 and the circulars issued thereunder as their intent is to unload the baggage relating to legacy disputes under the Central Excise and Service Tax and to allow the businesses to make a fresh beginning.

M/s. Seventh Plane Networks Private Limited vs. UOI, High Court of Delhi, decided on 14.08.2020 in W.P.(C) 3934/2020.

5. Whether the Appellant is liable to pay Service Tax on Sale of water? Whether the Appellant is liable to pay service tax on the advances received for construction of terminal which in turn was used for bunkering under 'Renting of Immovable Property Service'?

Facts and Pleadings: M/s. United Port Services Pvt Ltd (hereinafter referred to as 'the Appellant') is inter-alia engaged in purchase and sale of water at port and the differential of the sale and purchase price is the profit earned by the Appellant. The Appellant has also received some advance from M/s Asian Tanking Pvt Ltd. for construction of terminal which in turn was used for bunkering.

According to the department that the aforesaid sale of water by the Appellant at port falls within the ambit of Port Services under Section 65 (105) (zn) of the Finance Act, 1994. The department has also alleged that the amount was an advance paid by M/s Asian Tanking Pvt Ltd. towards hiring or renting of bunkers and the same is taxable under the Renting of Immovable property service under Section 65 (105 (zzzz) of the Finance Act, 1994.

The Appellant submitted that the Water supply done by the Appellant is actually a sale of water which is outside the purview of the Finance Act, 1994 and was also specifically excluded during a negative list period in view of Section 66D(e) of the Finance Act, 1994. The Appellant submitted that they have purchased the water from their suppliers at a lower price than their sale price and thus earned a profit. Therefore, no service tax can be levied upon them on the value of sale of water. The Appellant further contended that the advances have been received from their customers for

construction of a terminal which is to be used for bunkering. The activity has not come to fruition and in terms of their agreement they were entitled to retain the advances received which they did. The Appellant submitted that the merely, because they have received some amount from their customers it does not mean that they are liable to pay service tax on such amounts unless the amounts were received towards rendering of a taxable service.

Judgement: The Hon'ble CESTAT observed that selling goods on their own account to customers does not qualify as a service or else, every merchant in the country should be held to be rendering a service. Thus, the Hon'ble CESTAT was of the considered view that sale of water is not exigible to Service Tax rather it is squarely covered by the definition of purchase and sale of goods. The Hon'ble CESTAT further observed that a plain reading of the definition of port service also shows, it is a service rendered within a port or other port, in any manner. It is not sale of goods (including water) within the port. Many goods may be sold or bought within the port, but all these do not become services merely because the venue of the sales happens to be the port area. Accordingly, the aforesaid demand under Port Services was set aside. Further, the Hon'ble CESTAT held that the Appellant have received amounts as advances for construction of a terminal for bunkering and merely because the Appellant has received some amounts from their customers they do not have to automatically pay service tax unless such amounts are relatable to rendition of a taxable service. Accordingly, as the department failed to show that the aforesaid advance was received for any Renting of Immovable property service, demand on this count was also set aside.

M/s. United Port Services Pvt Ltd vs. CCE, CESTAT Hyderabad, decided on 21.02.2020 in Service Tax Appeal No. 2820 of 2012.

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UNREPORTED TRIBUNAL DECISION

By Ajay R. Singh, *Advocates*

S. 10(38)/68: Bogus Capital Gains from Penny Stocks – third party statement - cross examination not provided:

The Tribunal observed that the primary material to make additions in the hands of assessee was the statement of one Shri Vipul Bhat and the outcome of search proceedings on his associated entities including M/s. SAL. However, there is nothing on record to establish vital link between the assessee group and Shri Vipul Bhat or any of his group entities. The assessee, all along, denied having known Shri Vipul Bhat or any of his group entities. However, nothing has been brought on record to controvert the same and establish the link between Shri Vipul Bhat and the assessee. The opportunity to cross-examine Shri Vipul Bhat was never provided to the assessee which is contrary to the decision of Hon'ble Supreme Court in M/s. Andaman Timber Industries V/s. CCE (CA No. 4228 of 2006) wherein it was held that not allowing the assessee to cross-examine the witnesses by the adjudicating authority though the statement of those witnesses were made the basis of the impugned

order is a serious flaw which makes the order nullity in as much as it amounts to violation of principal of natural justice because of which the assessee was adversely affected

The AO has not discharged the onus of controverting the documentary evidences furnished by the assessee and by bringing on record any cogent material to sustain the addition. The allegation of price rigging / manipulation has been levied without establishing the vital link between the assessee and other entities. The whole basis of making additions is third party statement and no opportunity of cross-examination has been provided to the assessee to confront the said party. As against this, the assessee's position that that the transactions were genuine and duly supported by various documentary evidences, could not be disturbed by the revenue .

Dipesh Ramesh Vardhan vs. DCIT (alongwith other appeals) [I.T.A. No. 7648/Mum/2019 dated : 11/8/2020, AY : 2014-15 "D" BENCH, MUMBAI]

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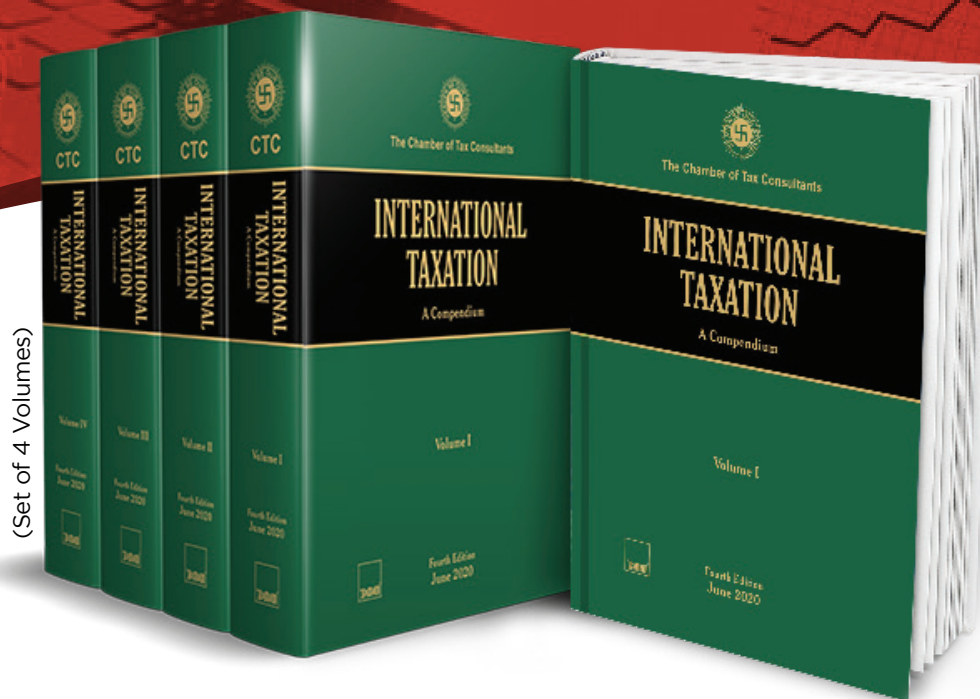
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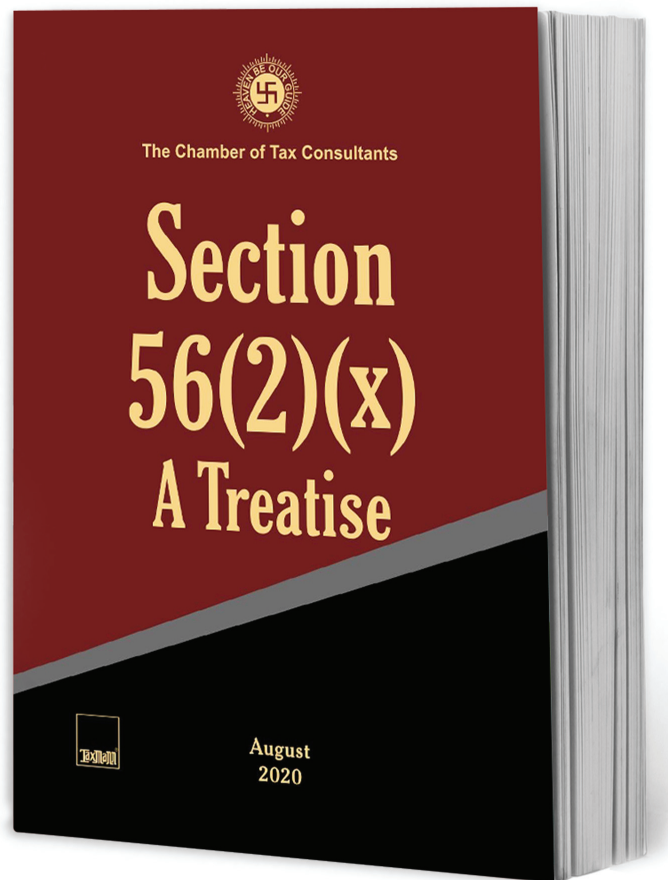
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Non-receipt of the CTC News must be notified within one month from the date of publication, which is 1st of Every Month.

Printed by Shri Kishor Dwarkadas Vanjara and published by him on behalf of **The Chamber of Tax Consultants (owners)**, 3, Rewa Chambers, Ground Floor, 31, New Marine Lines, Mumbai-400 020 and Printed at **The Great Art Printers**, 25, S. A. Brelvi Road, Unique House Opp, Apurva Restaurant, Next to Poddar Chambers, Ground Floor, Fort, Mumbai-400 001. and published at **The Chamber of Tax Consultants (owners)**, 3, Rewa Chambers, 31, New Marine Lines, Mumbai 400 020.

Editor : Shri Kishor Dwarkadas Vanjara

Posted at Mumbai Patrika Channel Sorting
Office-Mumbai 400 001.

Date of Publishing 1st of Every Month
Date of Posting : 1st or 2nd September, 2020

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