JIGnyasa

Vol. II | No. II | December 2020

Your Quarterly Companion on Tax & Allied Topics

Learning Today...
Leading Tomorrow

HEAVEN BE OUR GUIDE

Estd. 1926

ज्ञानं परमं बलम्

The Chamber of Tax Consultants

Mumbai | Delhi

www.ctconline.org

THE CHAMBER OF TAX CONSULTANTS
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Website : http://www.ctconline.org

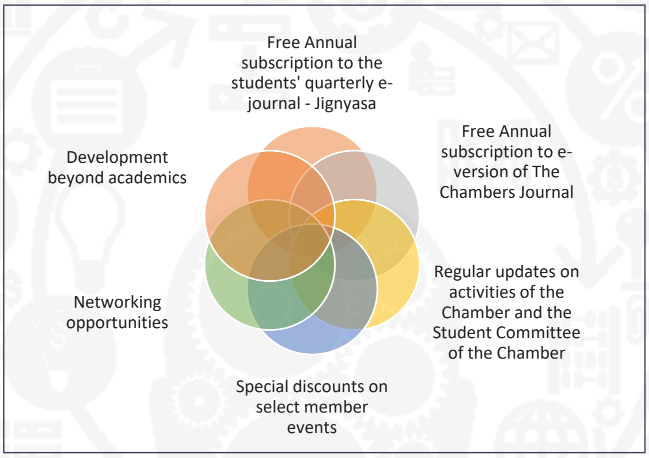
READER'S SUGGESTIONS AND VIEWS

We invite the suggestions and views from readers for improvement of ***Jignyasa***. Kindly send your suggestions to office@ctconline.org

Become a Student Member of The Chamber of Tax Consultants

What are the initiatives/programs organised by the Chamber for Students?

What are the benefits of becoming a student member of the Chamber?



Who can become a Student Member?

Any person, who:

✓ has completed 18 years of age;

✓ is not otherwise eligible to be a member of the Chamber;

✓ is pursuing his/her education as a student and has enrolled as a student of Law, Chartered Accountancy, Cost and Management Accountancy, Company Secretary, Chartered Financial Analysts, Business Management or Management Accountancy or Masters in Commerce or such other course approved for this purpose by the Managing Council shall be eligible to be a Student Member.

What are the fees for becoming a Student Member?

The fees for becoming a student member is merely Rs. 590/- [Rs. 500/- + Rs. 90 (GST @ 18%)]

How can one enroll as a Student Member?

You may download the membership form using the below mentioned link
Link : https://rb.gy/rw3xde

You can also get in touch with the Chamber's office at:
Address : 3, Rewa Chambers, Ground Floor, 31, New Marine Lines, Mumbai 400 020
Email : office@ctconline.org

For any queries, you can also get in touch with Mr. Hitesh Shah (Manager) at:
Mobile : 7977258507

POLICY FOR CONTRIBUTION OF ARTICLES FOR JIGNYASA

Who can contribute?

The Student Members of The Chamber of Tax Consultants shall be allowed to contribute articles to the students' e-journal ***"Jignyasa"***

For which columns shall contributions be accepted?

Every issue of Jignyasa shall have the following four columns for contributions from students:

1. Information Technology
2. Current topics related to the profession
3. SOP on subjects that are related to upcoming due dates
4. A general topic that is relevant to the student members of the Chamber

What is the selection process of the article for publishing?

The selection of the articles to be published shall be based on the following parameters:

1. The topics should be relevant to the Students Members of the Chamber covering the various areas of practice.
2. The Article to be published should be original and must adhere to strict originality guidelines of the Chamber. A declaration to this effect should be submitted to the Chamber.
3. Subjects related to current topics or subjects which are related to the due dates falling in the next quarter shall be given preference.

What are the technical requirements for the article?

1. The article should contain an executive summary of around 100 words.
2. The list of references should be submitted at the end of the article.
3. A photograph of the author should be provided along with the article.
4. The article should be shared only in word format. No other format shall be accepted.

5. There is no specific restriction on the number of words for the article, but preference shall be given to a well written, the most technically correct, complete and concise article.

What is the review process?

The student is advised to approach a member of the Chamber to be his/her mentor for the article. If the interested student cannot find a mentor, the committee shall help him/her approach the members.

Each article shall then be forwarded to an expert for vetting and verification.

The article post vetting and verification shall be forwarded to the author with suggestive changes. Once approved by the author, the amended article shall be forwarded for publishing.

The articles received which are not published in the current issue of Jignyasa shall be parked in the Chamber's locker for the next issue.

Articles that are not found suitable for publication, communication to the Author of the article shall be made to that effect.

INDEX

Invitation to STUDENT MEMBERS to contribute articles for Jignyasa

The Student Committee of the Chamber invites the **Student Members** to contribute articles for the e-journal for Students – **Jignyasa**. The objective of the committee is to make a major section of the journal - for the students by the students. The students can contribute articles on latest updates in the tax and allied laws, Standard Operating Procedures that can be used for the upcoming due dates, current scenarios in various industries or any other topic. You can send through your article in word format on office@ctconline.org along with your name, firm name/college name and a photograph. From among the articles received, the ones approved by the committee shall be published.

From the President

My Fellow Students,

> *"Take up one idea. Make that one idea your life – Think of it, Dream of it, Live on that idea"*
>
> **- Swami Vivekananda**

A Very Happy, Healthy, Safe and Successful New Year to you. The new year has ushered in a new decade, the second decade of this century, a decade of hope, a decade of renewal of brotherhood-yet a decade of change, of ever developing technology, of new social behaviour, of virtual working, and indeed virtual learning. A decade beginning with the arrival of the COVID -19 vaccine, a decade where many people resolve to get back their working lived into a semblance of routine. In short, a decade and also, a year to keenly watch out for, as it may have the potential to completely change our lives.

It is in these turbulent times, that Swami Vivekananda's message above becomes very relevant. A message of single minded focus, a message of never deviating from one's goal, come what may. A message to accept in one's stride, any change, may it even be change that can completely cause swings of great magnitude. A message of devotion.

A student's life has been probably the most impacted by the pandemic. Schools and Colleges have shut down. Uncertainties over when examinations have been or will be conducted stll continue to haunt, Face to face interaction with teachers, peers, friends etc. has become a bare minimum, as have 'fun' moments where one could let one's hair down (so the expression goes). Confusion over choice of career, derailment of previously made plans, we never had it so tough. I, as the parent of a 23 year old, recently qualified doctor, have lived this through the recent months.

And I know, it is very easy to preach, but let me tell you, friends, that it is only single minded devotion, that can take us through these tumultuous times and probably make us more focussed, more clear, and more driven to doing something bigger and better for the society. Let us not think that we do nothing for the society. Each individual, by playing his/her role, dutifully and with positive intent, makes the world a better place to live, and the results may not always be visible, but the work we do is indeed invaluable. We cannot see each weave of a cloth but can certainly see the beautiful pattern that has been crated as a result thereof. We therefore need to be focussed, be clear and be driven towards this ultimate objective.

What applies to each one of us also applies to the Chamber. We will, in the new year, once again renew with grater force, our pledge to impart better and more practically oriented education to you, through our very vibrant and focussed student committee. You will see elsewhere in this issue, announcements for the next interactive session, 'Udaan', with a very young, enterprising yet experienced lawyer, Ms. Almitra Gupta and also see a communication for our forthcoming Dastur debate competition. I encourage you to fully participate in these two excellent initiatives.

The Legal Practice Orientation Couse, the Committee conducted in November 2020, has received very positive feedback. I thank the Committee for their hard work and excellent conduct of the course.

Let me sign off for this communication by reinforcing to myself, and to all of us, something that our Prime Minister, Shri Narendra Modi said, which has resonated in my mind ever since I have heard it:

"Hard work never brings fatigue, it brings satisfaction"

Once again, a very Happy and Positive New Year to everyone.

Yours sincerely

Anish Thacker
President

Chairperson's Message

My Very Dear Students,

To all my dear Students friends... I wish you a very happy, healthy and successful 2021.

As we present the 3rd issue of Jignyasa, an e-journal for the students by the students, I take this opportunity yet again to connect with you, my young friends and discuss the importance of yet another virtue which may possibly be the King of all the human virtues...

To make a successful and extraordinary life out of this human birth that almighty has bestowed upon us, one needs to strive constantly to cultivate some extraordinary qualities and virtues. Such virtues include hard work, positivity, honesty, patience, gratitude, discipline, compassion and many more. However one virtue that triumphs them all is the virtue of "Courage".

We have all heard popular dialogs-slogan-phrases such as

जो डर गया... समजो वो मर गया (The one who got scared died.)

हिम्मते मर्दा मददे खुदा (When you dare, God helps.)

डर के आगे जीत है (Victory is beyond fear.)

Most of the childhood stories that we have heard, the movies that we have watched were to influence us with the great quality of being brave –heroic ... be it a fairy tale or a Bollywood movie or a katha from Puranas or any historical episode .... All taught us to be brave and not to be afraid of any situation, conquer one's weakness and aim at doing something courageous and be the Braveheart.

As we grew up, we learnt about many national and international personalities who showed extreme bravery in various situations and for various causes - be it a fight against racism & slavery, education for all or for religious / political freedom.

To name a few:

- **Helen Keller who overcame dual disability of deaf and blindness**
- **Nelson Mandela who was an anti-apartheid activist and fought for those who were disadvantaged by the system of racial segregation.**
- **Mahatma Gandhi who led a non-violence movement for India's Independence**
- **Panna Dai - a mother who sacrificed her own son for the Mevar**
- **Ranjitsinh Disale - UNESCO global teacher, award winner from Solapur India who shared half of his prizemoney with his fellow contestants teachers from the world for the said award**

These personalities have, without a doubt, set inspiring examples of heroic deeds and endangered their lives while also putting their wealth and repute at stake for a cause in the interest of the world at large. We must all learn from them and imbibe this great virtue of courage within us to dare dream of what we in our small tiny life feel is impossible or too big to be achieved.

However, does courage means being brave and not being afraid of anything? No. Courage is a lot more than that...

Courage is not absence of fear but strength and power to conquer fear...

Courage is to follow an unconventional path leading to your dreams and passion and to leave the set comfortable life to achieve something which your heart dreams of...

Courage is to take a position against what you believe is wrong and fight against it...

Courage is to stand up with dignity when destiny puts one in an emotional or a physical loss...

Courage is to scarify personal happiness and comfort for a worthy cause or a worthy relation...

Courage is to hold on to a situation which may sound financially, emotionally or physically utter hopeless...

Courage is to accept failure and rejection and rise again...

Courage is to position an institution or a cause above one's personal interest when it comes to matter of social, business or national importance.

So in a true sense courage is the king of all the virtues and once can certainly develop this virtue by constant and conscious training to one's mind to be courageous.

Life is full of worries – some real and some self-created. To have a clear and determined mind and to focus on what one wants to achieve one has to develop a courageous mind.

And the more you listen to or watch or read the inspirational stories of real life heroes, the more one learns about how great human beings have behaved in tough situations and if they could do such acts, why can't we?

So, let's make a resolution to read such inspirational stories at least once a month to develop a courageous mind that would help us face situations which have already been faced by these real life heroes with great spirits and who have come out victorious.

Especially during these unprecedented times of COVID, life is full of uncertainties about the way our educational, professional, family and social life shall be...But friends, this is the right time to show courage and withstand this situation, start with a small contribution to the lives of the people who need our help. If each of us contribute in some way, the world around us may be a much better place.

Also, this is the time to believe in your dreams and passion and follow the same by giving away the tested and comfortable paths of life and jump into the land of opportunities that this new normal life has given us.

Wishing you all a very happy and outstanding new year.

Varsha Rajaram Galvankar
Chairperson
Student Committee

FORTHCOMING PROGRAMMES

Student Orientation Course For The CA Students

We are pleased to announce a 8 sessions long Student Orientation Workshop for fresh articled students. The workshop is uniquely designed to acquaint the students in some of the important aspects of article ship. This course would give students a sneak-peek into the nature of work that they would be engaged in during article ship training.

Days & Dates - 4th (Thursday), 5th (Friday), 11th (Thursday) and 12th (Friday) March, 2021

Time - 11.30 am to 1.00 pm and 5.30 pm - 7.30 pm

Who should attend? - Articled Students and Others

The Objective - To provide basic knowledge of all the day to day activities undertaken during the course of article ship along with understanding of subjects in a practical manner

The Course is as follows:

Date	Time	Topics	Speaker
04-03-2021 (Thursday)	11.00 am - 1.00 pm	Introduction to Audit and its practical aspects	CA Mehul Sheth
	Break		
	5.30 pm - 7.30 pm	Accounting and Auditing Standards	CA Heneel Patel
05-03-2021 (Friday)	11.00 am - 1.00 pm	Basics of GST	CA Sachin Meher
	Break		
	5.30 pm - 7.30 pm	GST annual return & audit	CA Sumit Jhunjhunwala
11-03-2021 (Thursday)	11.00 am - 1.00 pm	Basics of Income tax and return filing	CA Kalpesh Katira
	Break		
	5.30 pm - 7.30 pm	Basics of TDS/TCS & advance tax	CA Avinash Rawani
12-03-2021 (Friday)	11.00 am - 1.00 pm	Company Law	CA N Jayendran
	Break		
	5.30 pm - 7.30 pm	Office etiquettes and Soft skills	CA Suresh Subramanian

Participation Fees:-

For Student Member : Rs 250/- + 45/- (GST) = Rs. 295/-

For Others:- Rs. 400/- + 72/- (GST) = Rs. 472/-

THE DASTUR DEBATE COMPETITION

Thursday, 28th & Saturday, 30th January, 2021

Venue: Virtual e-Platform

The Chamber of Tax Consultants in association with **H. R. College of Commerce and Economics** is pleased to announce its Fourth Debate Competition.

Objectives

Debate is the art of dialectic, that puts questioning, reasoning, critical thinking and logic at the heart of the trivium. These are all essential attributes of a great education and to be able to do them well can help ensure that young people perform well academically and, indeed, socially. The young students are the future of our nation. They have the potential to bring new ideas before society. The objective behind organising The Dastur Debate Competition is to ignite students' thought process and bring before us mint fresh thoughts.

Every year, the Competition is held physically at H.R.College of Commerce and Economics, Mumbai. However, due to the ongoing Covid-19 pandemic, we will be organizing the Debate Competition on e-platform which will enable a wider reach and participation from colleges/firms across India.

Details of the Debate Competition are as under:	
Each Team consist of :	Two participants (Colleges/Law firms/CA firms/Individual* are eligible to send their teams)
Eligibility of participants :	a. A student below 24 years of age AND b. A student studying in law/commerce college and not possessing any professional qualification such as CA, LLB, CS, ICWA etc. Note : CA/CS Articled Assistants are allowed to participate.

*Individual should enroll as an Independent Team

Enrolment is restricted on a First-Come-First-Served-Basis. Interested students may send their enrolment along with participation details on ctcdebatecompetition@gmail.com

Awards

- Trophies & prize vouchers shall be awarded to the winning team, first and second runner up.
- An award will also be presented to the Best and 2nd Best Speaker.
- Physical Certificate of Participation will be presented to each of the participants.

1st Prize worth ₹ 7,500/-

2nd Prize worth ₹ 5,000/-

3rd Prize worth ₹ 2,500/-

The pre-event will be organised on **Monday, 25th January, 2021** to brief participants about the event and to assign the topics at **12 p.m.** on a virtual e-platform.

Enrolment is restricted on a First-Come-First-Serve-Basis. Interested students may send their enrolment along with participation details on ctcdebatecompetition@gmail.com on or before 20th January 2021.

ENROLL ONLINE

For Rules & Regulations please visit our website www.ctconline.org
or call on CTC Office 2200 1787 / 2209 0423 / 2200 2455
or HR College - Ms. Trisha Dutta - 7738907722 / Ms. Pooja Wagh - 8433810168

The Chamber of Tax Consultants

January 13, 2020

Udaan ~ Learning Today... Leading Tomorrow
Episode 3 of the Chat Show with the Stalwarts of the Profession

The Student Committee of the Chamber of Tax Consultants is pleased to announce the 3rd Episode of its unique Chat Show "Udaan" with a very young and dynamic legal professional **Ms Almitra Gupta** from the **Magic Circle law firms.**

Magic Law firms are renowned for their top notch clients and have their offices at multiple locations across the globe.

In the current time, many Indian law students are keen on joining multinational law firms. The object of this chat show is to acquaint students with career prospects in the legal profession abroad. For this Third Episode of the Chat Show ~ Udaan - Learning Today...Leading Tomorrow, **Ms. Almitra Gupta, Advocate & Solicitor** has generously agreed to share her invaluable insights on her education abroad, her career with the Magic Circle Law Firm and global opportunities for Indian law students

Webinar Link Details

Day & Date	Thursday, 21st January, 2021
Time	5.30 pm - 6.30 pm
Guest	Ms. Almitra Gupta, Advocate & Solicitor, Member of NY Bar Association, Senior Associate at Linklaters, Singapore
Who should attend?	Anyone who wants a glimpse into the opportunities in legal field globally
Webinar Registration link	https://bit.ly/3rFX1Pe

After registering, you will receive a confirmation email containing information about joining the webinar. Then click on the link to join the webinar.

Enroll soonest to avoid disappointment.

Join our WhatsApp group "CTC – Learners to Leaders" for updates on all the programs by the Student Committee of the Chamber : https://bit.ly/3b6mDPJ

Thanking you,

For The Chamber of Tax Consultants

Sd/-

Varsha Galvankar
Chairperson
Student Committee

Digital Transformation Series 1

Alok Jajodia

Series 1 on Digital Transformation

From this issue, we are coming up with a series of articles on Digital Transformation.

Digital transformation is the 'buzzword' going around for quite some time. Due to the ongoing pandemic, not only the working locations of the people have changed, but the style of working has also changed. The requirement and the flow of information has changed as well. Therefore, the buzzword has become a reality and companies have aligned their workstation strategies to accommodate and invest in 'digital transformation'. The pandemic has forced businesses to reprioritize their strategic IT roadmaps, adopting cloud applications for communications, collaborative and online working.

What is digital transformation?

Our smartphones carry all the data needed (and much more) for us to be productive all day long, from calendars to calculators, home energy notifications to transportation options, and food delivery services to weather forecasts. But it is when technology doesn't work for us, that is when we feel its absence the most.

As per Oxford dictionary

(https://www.oxfordlearnersdictionaries.com/definition/english/digital_1)

Digital *adjective*

using a system of receiving and sending information as a series of the numbers one and zero, showing that an electronic signal is there or is not there; connected with the use of computer technology, especially the internet.

Transformation *noun*

[countable, uncountable] a complete change in somebody/something; [uncountable] (in South Africa) the process of making institutions and organizations more democratic.

Digital Transformation is the adoption of technology to transform business or organization through replacing manual processes with the digital process or replacing old technological process with new technological process.

In other words, 'digital transformation' is the process of using technology to create new/or modify existing business processes, culture, and customer experiences to meet changing business and market requirements.

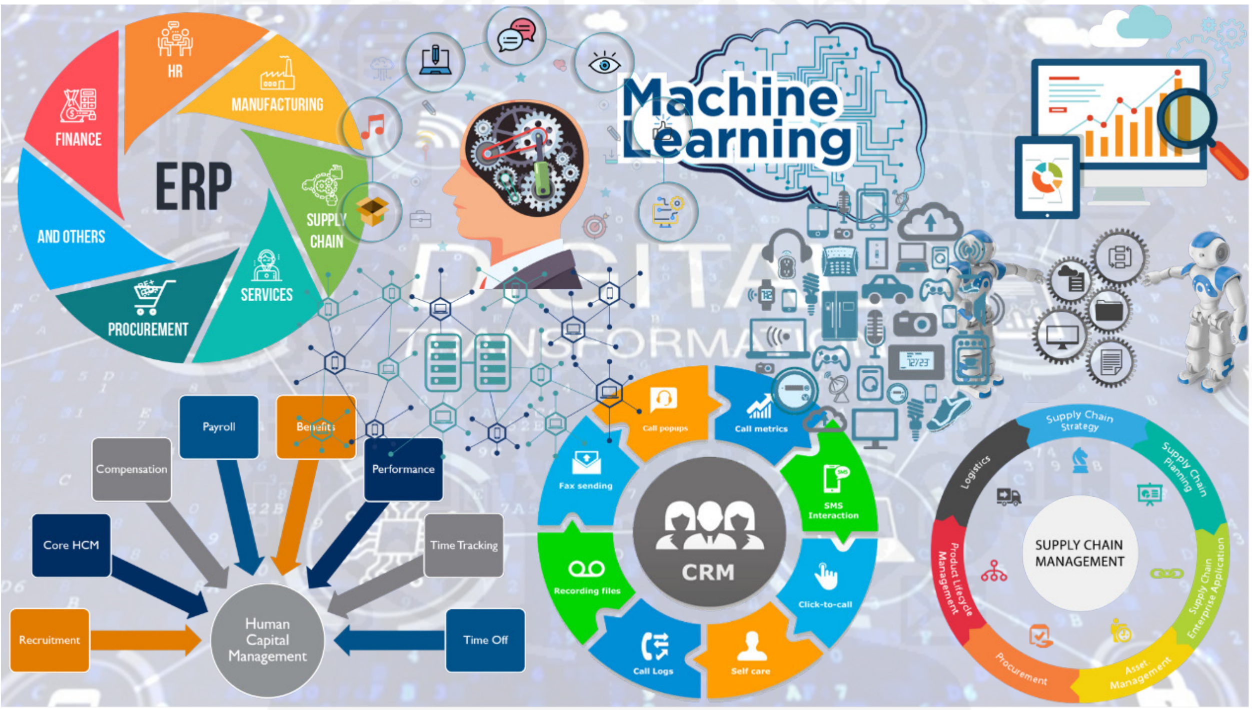
One aspect of digital transformation is 'going paperless', which affects business, process and people. The impact of a small digital transformation can be affecting the whole segment of the society, government, mass communications, commerce, art, healthcare and science.

Examples of digital transformations in our day to day life are –

- The physical files in the cabinets have become bits and bytes in the cloud storage (Google Drive).
- Hotel bookings and rental cars have replaced with spare rooms (AirBnB) and drivers are booked from the smart phones (Uber).
- Instead of typing ourselves asking the voice assistant to type for us (Siri).
- Income tax and various statutory filing has become paperless

Most common digital transformation technologies

Digital transformation need not always be a product or a solution to be purchased and implemented, but it affects everything IT touches in every industry and individual. Generally, it is looked upon as a solution or any sort of technology that can help automate the business processes. Solutions could be ERP, CRM, HCM, business intelligence and analytics, robotics automation, blockchain, artificial intelligence, Internet of Things (IoT), etc...



- **Finance and Accounting Software** – basic automation of the finance and accounting processes is generally taken up by the companies as the foremost transformation activity. This could be as simple as Tally or Quick books and even Excel spreadsheets for information capturing and reporting. Over the period, as the organization grows, the requirement arises to integrate the finance and accounting solution to other non-finance and accounting functions of the organization.
- **Enterprise Resource Planning (ERP)** – The most common system that the organizations implement to capture all the data. ERP can be a single platform that has integrated modules related to financial accounting, HCM, CRM, SCM, BI and

many others. ERP has the common look and feel across all solutions and therefore, some prefer to have one solution instead of many. But, all the modules of the ERP may not give the very best functionality that the organization might need.

- **Human Capital Management (HCM)** – all employee intensive companies and organizations having more than a certain number of employees, want to automate their HR business processes and would have HCM solution implemented. The solutions provide automation right from the recruitment or hiring process, benefits estimation and payroll process, performance management to retirement or exit of employees. The solution helps to treat the human capital (employees) as an asset.
- **Customer Relationship Management (CRM)** – for the sales-driven organization, CRM solution helps the sales team to track the pipeline. The solution gives the single source of truth across the sales team with who, what, where is performing. It assists in managing process and helps in taking decisions which can increase the revenue and better performance of the sale team. In addition, it can also integrate with other solutions to provide information to the operations team to get ready for the execution.
- **Supply Chain Management (SCM)** – for the companies who have to manage the supply of goods, SCM solution helps to efficiently track inventory for raw materials, getting them to the production house on time for producing finished goods, and getting the finished goods to the requisite warehouse or to the customers directly on time. The solution would automate the global and even complicated supply chain and manage the whole supply chain in most effective and efficient manner.
- **Business Intelligence (BI)** – one of the most popular technology; all businesses have, over a period, accumulated data related to all aspects of business-like sales, expense, production, operations transactions and so on. BI solution takes the raw data and converts it into actionable and actual information. It helps to create reports showing trends over time-series, assisting management to make real-time, better and informed decisions. BI Solution has the presentation layer presenting the data that is more understandable via dashboards and reports.
- **Mobile Applications** – the biggest trend in the current situation. Mobile applications help to have functionalities move to mobile devices. It helps to make it more user friendly and experience for the employees, customers and the vendors. Some off-the-self products would have native apps on the mobile and for some, the mobile applications might be needed to be developed and integrated. It also helps with access controls and does not give access to the whole system. It also helps in completing the specific process faster.
- **Custom Technology** – though there are off-the-shelf products available for almost all the requirements, some complicated and unique requirements are better-off met with custom solutions. There could be requirements to fill the gaps of the off-the-shelf solutions, which could be custom developed. It may also involve the customization to the off-the-shelf solution to meet the requirements.

- **Other Emerging Technologies** – various new-age technologies like Artificial intelligence, Machine learning, Robotic automation, Predictive analytics, Internet of things, etc… are emerging and talked about a lot. These technologies are now being used in the above-mentioned solutions. Vendors are constantly upgrading their offerings and solutions so that they are cloud-ready and at par with new-age technologies.

For every company, the meaning of digital transformation is different. It all depends on the priority and needs, the dynamics, the industry vertical in which they are, the customer base, and the technology used and so on.

Difference between Digital Transformation and ERP Implementation

One of the most common question asked is that 'if we already have ERP or we are implementing ERP, what more digital transformation is required'. Therefore, it is necessary to understand the difference between ERP implementation and complete Digital transformation.

	ERP Implementation	Digital Transformation
Overview	Traditionally, it has been a back-office technology system.	Wider set of technology solutions that hovers across organization.
	Usually a single platform.	Generally, involves multiple technologies from multiple vendors.
Modules/ Functionalities	All the back-office solutions like Financials, Inventory, Distributions, Operations, etc…	Including ERP, it can have solutions like eCommerce, Web applications, Analytics, Artificial Intelligence, Machine Learning, Robotic Automation, etc…
Value to Business'	Operational efficiency enhancements, back-office automation, comparatively lower maintenance costs and operating costs.	Top-line revenue enhancements, concentration on customer satisfaction and loyalty, strategic out-comes, efficiency enhancements of entire organization.
Time and costs	Since quite a few processes are standardized over time, it takes comparatively reasonable timeframe and costs. Based on the implementation success, ROI is faster.	Typically, longer duration and short-term costs are higher. Since it covers revolutionary changes, it requires more time and costs. Phased implementation is always recommended.
Business Process Changes	The aim is to optimize, automate and enhance existing business processes. Proper controls are established in the processes.	Might involve new business models and ways of doing business; therefore, new processes are to be defined, process re-engineering and optimization can lead to quantum leaps in business.

	ERP Implementation	Digital Transformation
Organizational Change Management	Process change training, new technology training and better efficiency of existing resources form part of change management.	Redesigning and realignment of organization structure due to new business models would involve higher change management activities. It could also evolve the organization culture.
Risk Assessment	Comparatively moderate risk	High risk, as it involves significant changes in people, process and technologies.

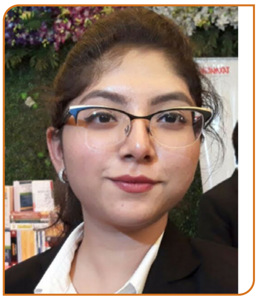
Digital Transformation is a journey and not the destination. It is about defining and identifying what needs to be transformed and how one would rather do things and then identifying the digital technologies that could implement the vision and adapt to the least disruptive strategies to manage the transition. It is always better to strategize the transformation and then plan the execution. To conclude, overall benefits of digital transformation can be summarized as below:

- Reduced human efforts
- Accurate, faster processes
- Value add by realignment of resources
- Increased productivity on routine tasks
- Integrated, connected IT ecosystems leading to faster decision making
- Edge over competitors, improved toplines and bottom-lines

Moving forward in the future series we would cover the following topics:

- *Strategy for digital transformation*
- *Assessing the readiness of digital transformation*
- *Role of Business Process Innovation in digital transformation*
- *Role of Change Management in digital transformation*
- *Project and Quality Assurance [Program Management] of digital transformation*
- *Key challenges or reasons for failure of digital transformation.*

Stock Audit



Sharwani Sawant   Priti Savla

As per the definition of ICAI, "An Audit is an Independent Examination of Financial Information of any entity whether profit oriented or not, and irrespective of its size or legal form, where such an examination is conducted with a view to express an opinion." An audit helps in the detection and prevention of errors and frauds, it helps in maintaining the records and verification of the books of accounts. Further it establishes a moral check on the staff of the business so that they became aware of not committing any irregularity. Stock Audit is one of the different types of audits that are performed with an objective of expressing an opinion, whether the physical stock are in lines with the maintained records and its valuation is appropriate. In this article we shall understand about the Stock Audit in detail.

➢ What is Stock?

Inventories can be defined as tangible property held for sale in the ordinary course of business, or in the process of production for such sale, or for consumption in the production of goods or services for sale, including maintenance supplies, consumable stores and spare parts meant for replacement in the normal course. Normally, the Inventories comprises of raw materials including components, work-in-process, finished goods including by-products, maintenance supplies, stores and spare parts, and loose tools.

➢ What is a Stock Audit?

Stock audit or inventory audit is a term that refers to physical verification of a company or institution's inventory assets. Inventories are the important constituent of the Business constituting of a significant portion of the total assets, particularly in the case of manufacturing and trading entities as well as some service rendering entities. Audit of inventories, therefore, assumes special importance.

Before understanding on how to conduct the stock audit let us first understand the Guidance Notes issued by ICAI. The Guidance Notes provides direction on procedures to be followed by an auditor in respects of Stock Audit. It highlights the peculiar features of inventories, which impact the audit procedures. The important features of the Guidance Note are stated as below:

1. Internal Control Evaluation

Internal Controls plays an important role. Therefore it is of the utmost importance that such Internal Controls must be evaluated and understood properly. This involves segregation of incompatible functions, standard form for recording movement of inventory, cross checking of data generated by different departments. The auditor should also review specific controls over receipts, issues, physical inventories, and inventory records.

2. **Verification**

Maintenance of Stock is the responsibility of the management. Further the management is also responsible for the maintenance of the stock records. While conducting the Audit of inventories, the auditor is particularly concerned with obtaining sufficient appropriate audit evidence to corroborate the management's assertions regarding the following:

Verification of inventories may be carried out by employing the following procedures:

- **Examination of Records:** The extent of examination of records by an auditor with reference to the relevant basic documents (e.g., goods received notes, inspection reports, material issue notes, bin cards, etc.) depends upon the facts and circumstances of each case.

  The auditor may come across cases where the entity does not maintain detailed stock records other than the basic records relating to purchases and sales. In such situations, the auditor would have to suitably extend the extent of application of the audit procedures.

- **Attendance at Stock Taking:** The need for auditor's attendance at stock taking would depend upon his assessment of the efficacy of relevant internal control procedures. The procedures concerning the auditor's attendance at stock-taking depend upon the method of stock-taking followed by the entity (i.e. Periodic or continuous method). The auditor should observe the procedure of physical verification adopted by the stock-taking personnel to ensure that the instructions issued in this behalf are being actually followed. He should also examine whether the entity has instituted appropriate cut-off procedures.

- **Confirmation from Third Parties:** Where significant stocks of the entity are held by third parties, the auditor should obtain and examine an evidence that the inventory is held with such third parties. The auditor may directly obtain from the third parties written confirmation of the stocks held.

- **Examination of Valuation and Disclosures:** The auditor should satisfy himself that the valuation of inventories is in accordance with the normally accepted accounting principles and is on the same basis as in the preceding year. The generally accepted accounting principles involved in the valuation of most types of inventories are dealt with in Accounting Standard (AS) 2, "Valuation of Inventories", issued by ICAI. Auditor should also examine the evidence supporting the assessment of net realizable value. The auditor should satisfy himself that the inventories have been disclosed properly in the financial statements.

Analytical Review Procedures: The analytical review procedures may often be helpful as a means of obtaining audit evidence regarding the various assertions relating to inventories such as:

i. reconciliation of quantities of opening stocks, purchases, production, sales and closing stocks;

ii. comparison of closing stock quantities and amounts with those of the previous year;

iii. comparison of the relationship of current year stock quantities and amounts with the current year sales and purchases, comparison of the composition of the closing stock, comparison of significant ratios relating to inventories, etc.

- **Work in Progress:** the auditor has to carefully assess the stage of completion of the work-in-process for assessing the appropriateness of its valuation. For this purpose, the auditor may examine the production/costing records (e.g., cost sheets), hold discussions with the personnel concerned, and obtain expert opinion, where necessary.
- **Management Representations:** The auditor should obtain from the management of the entity, a written statement describing in detail, the location of inventories, methods and procedures of physical verification and valuation of inventories. However, it does not relieve the auditor of his responsibility for performing audit procedures to obtain sufficient appropriate audit evidence to form the basis for the expression of his opinion on the financial information.
- **Documentation by the auditor:** The working papers are of the most importance therefore, the auditor should maintain adequate working papers regarding audit of inventories. He should maintain on his audit file a summary of inventory held, details of physical verification conducted, evidences, audited financial statements, third party confirmations, stock insurance details, extent of his verification conducted etc. The management representation letter concerning inventories should also be maintained on the audit file.

The nature, timing and extent of audit procedures to be performed is, however, a matter of professional judgement of the auditor.

We have understood the basic guideline on how one should perform Stock Audit. Now let us understand the practical application of the same.

➢ **Stock audit in the banking environment:**

The main purpose of audit in banks is to get an assurance on the quality and quantity of loan security. Inventories Audit in Bank verifies the Physical Verification of the Security ,Valuation of Security and Security of the Security.

An inventory audit helps to give the bankers an assurance regarding the following:

- Whether a suitable environment exists for preservation of Inventories.
- Whether the Inventories are being safeguarded by a responsible person.
- Whether degraded Inventories have been written off.
- Whether adequate safeguards exist against fire and natural calamities.
- Whether physical inventories tally with the Inventories statements submitted to bank.
- Whether the pledged/hypothecated Inventories is realizable.
- Whether Inventories is owned by the borrower.
- Whether all sanction terms have been adhered to.

Steps involved in stock audit

Stock audit is required to be conducted at the borrowers' place. But before visiting the borrower, understanding the entity, its banking operations and financial affairs is must. Therefore, it is advisable to visit the respective branch where the borrower is having the account so as to gather the information relating to Sanction, account operations, nature of business, performance of the borrower and other fundamental information along with the comments/observations noted by other auditors (like Internal Inspectors, Concurrent Auditors etc) to have a brief understanding about the borrower and its financial affairs.

Step I

Banks generally maintains the following set of documents: Original documents executed by the borrower i.e Demand Promissory Note, Hypothecation Deed, Guarantee Bond , Application form, project report, Sanction Letter, Audited Financial Statements, previous stock audit report. Stock statements are submitted every month by the borrower and the same are filed with the correspondence file or may be kept in a single file meant for keeping stock statements of all the borrowers. Scrutiny of the files along with the account operations and DP Register with reference to terms of Sanction helps stock auditor to gain insight about the borrower' affairs and conduct of the account. The Audit team should verify the following points at Bank branch:

The sanction letters, all mortgage documents and all records of the borrower as stated above.

Further the Audit team should also verify the Stock Statements and the audited financial statements to verify Whether the stock statements are sent to Bank regularly. Also one must check whether, the stock mentioned in the audited financial statement as on March 31 of previous year matches with stock statement given to Bank as on that date.

Further the Stock Statements should be verified along with the Bank computer system to verify whether the date of submission mentioned in the system, rate of interest & penal interest matches with the physical record.

Step II

After gathering basic information about the borrower and the nature of its business the Auditor should visit the borrower. Audit questionnaire should be carried at the time of visit so that all important points can be noted. Visit to borrower involves verification of stock and debtors, inquiry about internal control, future projections and financial plans of the borrower and analysis of past results and bank operations. Although audit is related to stock and debtors only, understanding of overall financial scenario and information about associates, sister concerns & their businesses may also help the stock auditor to finalize the report in a better manner.

The Audit questionnaire may consist of the following points:

- Verification of Books of Accounts & stock records & system. Whether the stock is kept in proper hygienic condition at the location mentioned at Bank.
- Does all the stock appear to be consistent with the records maintained by the Borrower.
- Whether the internal controls are satisfactory.
- Is the required stock insurance taken & that of Bankers' clause is mentioned in the policy.
- Is the stock bifurcated into Moving/ Non-moving – obsolete.

- The name plate of the Bank is mentioned at the location where the stock is maintained.
- Preparation of Draft Audit Report and discussion about audit findings with Bank official & Borrower

Step III

After the visits, stock audit report should be prepared in the prescribed format

which may vary from bank to bank. The report must cover all the areas and material information gathered during the audit.

The observations may include the following:

- Whether the borrower has complied with terms and conditions of sanction.
- Whether the borrower has submitted the stock statements in a Timely & adequate manner.
- Whether the operations of the account involve any frequent overdrawing, credit summation and cash withdrawals.
- Whether the Drawing power calculations are done by the banks and by the auditors & discrepancies, if any along with the reasons.
- Whether the Physical maintenance and storage of stock and adequacy of facilities at the borrowers place.
- Systems/procedures implemented by borrower to identify the slow and non-moving stock items.
- Borrower's Management information system, its adequacy & Internal controls to safeguard stock.
- Method of valuation of stock, time interval for valuation and adequacy & sufficiency of procedures thereof.
- Insurance of stock.
- Verification of Debtors.

During the Stock Audit the following irregularities are generally observed:

1. Stock/Book Debts statements not submitted/not submitted in time.
2. Inadequate details viz. rate, quantity and amount of different type of stock items not stated in the statement
3. Scrutiny of stock statements not done.
4. DP Register not written up to date.
5. Age wise analysis of Debtors not given. Debtors over 90 days (or as per sanction) considered for drawing power.
6. Drawing power not correctly calculated
7. Valuation of Stock is not done as per relevant accounting principles, Accounting standards (AS) and Engagement Standards [earlier Known as Auditing and Assurance standards (AAS)].
8. Details of stock statement are not timely updated in the bank's system.
9. Penal interest is not charged if the stock statement is not submitted/in time.
10. Latest visit report by branch official not on record. And Branch does not conduct frequent/timely visits for physical stock verification.
11. Defects pointed out by the Internal Auditors/Inspectors/Concurrent Auditors are not complied with.
12. All sales as per financial statements not routed through account.
13. Cash withdrawal during current period is abnormal.

14. Frequent overdrawing in the account.
15. Balance over drawing power although within Sanctioned Limit.
16. Insurance expired and not renewed, Premium for renewal policy paid but policy not on record.
17. Insurance Policy is obtained without Bank Clause. Or no coverage of all risks as per sanction.
18. Wrong items/description of goods on insurance policy
19. Stocks received under DA LCs are not excluded

Conclusion

Stock audit by external CA firm is one of the important tools of credit monitoring for the bank. Apart from ensuring safety of realizable security, it also helps the bank to discipline the borrower or may act as a warning signal against probable future NPA. It may aid the bank to take timely remedial measures to avoid substantial future losses. It also highlights the weaknesses, if any in the existing monitoring system of the branch through comments about maintenance of DP register, scrutiny of statements, review of accounts and compliance of audit findings. The scope of the Stock audit covers all the aspects that have a direct impact on the working capital of the unit as well as the aspects relating to Inventories.

Over and above, stock audit also has the utility for the borrower. It encompasses the aspects of Physical verification of inventories, Verification of condition of storage, Valuation of inventories and pointing out variances, Age-wise categorization of inventories, Evaluation of the Inventories management by the company, relating to quantity, rate, value of inventories, age, marketability, etc.

Comments about insurance inadequacies, wrong product description and locations stated in the policies etc; if rectified timely may save the borrower from avoidable future losses. Therefore, unlike Statutory Audit where there is thrust only on the compliance under respective statute, the Stock Audit is a knowledge value addition exercise for both – bankers as well as borrower.

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Errors and issues while filling E-TDS Return

Virati Rajawat Rushab Gandhi

As most of you must be aware that tax is levied on income earned by any person. The government of India in order to collect tax in advance (apart from advance tax) have one of the mechanisms called Tax Deducted at Source ('TDS'). The government uses TDS to collect tax in order to minimise tax evasion by taxing the income (partially or wholly) at the time it is generated rather than at the later date. As understood in general parlance, TDS is deducted by the payer as per the provisions mentioned in the relevant sections. The specified rates of TDS have been prescribed by the Government of India. The short summary of some of the popular section under Chapter XVII-B has been tabulated below:

Section	Nature of Payment	Limits	Rate
192	Salary	If taxable Income is more than basic exemption limit.	Average rate of income-tax computed on the basis of the rates in force for the financial year in which the payment is made, on the estimated income of the assessee for that financial year
194C	Payment to contractors	Single Payment texceeds more than ₹ 30,000OR Aggregate payment made during the financial year exceeds more than ₹ 1,00,000.	For Individual or HUF - 1%. Other than individual or HUF - 2%.
194H	Commission or brokerage	Payment exceeds more than ₹ 15,000/-.	5%
194I	Rent	If aggregate payment of rent exceeds ₹ 2,40,000/- during financial year	For land/building/furniture - 10%. For others 2%.
194J	Fees for Professional or Technical service	If aggregate payment exceeds ₹ 30,000/-. In case of directors sitting fees - No limit.	10%

Section	Nature of Payment	Limits	Rate
195	Other sums	If income is taxable in India	TDS rate to be decided basis the rate provided under the Income-tax Act or as per the Double Taxation Avoidance Agreement ('DTAA'), whichever is more beneficial to the assessee.

The above rates have been reduced by 25% in view of the Covid-19 pandemic (except for TDS on salary). Such reduced rates is applicable till March 2021. Reduction in rates will help to release of more funds to vendors resulting in more working capital in the hands of recipient.

Let's understand the concept of TDS with an example, suppose Company Y has charged professional fees of ₹ 1,00,000 on Company X. Company X will be liable to deduct TDS at 10% on ₹ 1,00,000/- i.e. ₹ 10,000. The said amount of ₹ 10,000 will have to be deposited with government by the payer or deductor i.e. Company X. Company Y will receive ₹ 90,000 as net payment from Company X and also tax credit of ₹ 10,000 which Company X would have deposited with government authorities on behalf of Company Y.

It is also important to note that any default in deducting TDS by Company X would result in interest liability for Company X apart from the penalty and prosecution proceedings which may be initiated by the Tax Authorities.

A general business may have multiple transactions with numerous parties whereby it is required to deduct tax at source while making payments. It is important for the deductor to keep records of all the parties on which tax is deducted at source so that there is no case of any default from its end.

While making payments of TDS to the government on monthly basis, the payment is made on cumulative basis and not transactions wise. For example, if an individual is required to deposit a sum of ₹ 1,00,000/- in respect of TDS liability under specific section for certain transaction, he/she can deposit the same in single challan by filling the basic details such as code, section number etc. instead of depositing challan for each transaction. However, it is also important for the government to know the details of the deductee for whom the tax have been deducted so that appropriate credit is received. The same is required to be reported by the deductor while filing the TDS return. Generally, TDS returns are filed on quarterly basis as follows:

Quarter ended on	Due Date of filing return
Transactions between 1 April to 30 June	31st July*
Transactions between 1 July to 30 September	31st October*
Transactions between 1 October to 31 December	31st January
Transactions between 1 January to 31 March	31st May
**The return filing dates have been changed considering the Covid-19 pandemic. The same has been extended till 31 March 2021.*	

The TDS return form generally contains the following details:

- Details of TDS paid i.e. amount, section, challan serial number, bank details, etc.
- Name of the deductee;
- Nature of payment;
- Section under which tax is deducted at source;
- Rate of Tax;
- Gross amount on which TDS is deducted;
- TDS amount;
- Date of payment or credit whichever is earlier;
- Date of deduction of TDS
- Date of payment of TDS
- Whether lower withholding tax certificate is available;
- Whether grossing-up;
- PAN number

Where PAN is not available in case of resident deductees, higher rate of TDS at 20% as per provisions of Section 206AA will apply.

Section 206AA of the Income-tax Act, 1961

To encourage more people to obtain PAN in India and to have a more legalised approach, the government has introduced a new section i.e. section 206AA, where the rates of TDS is kept at higher of 20% or actual TDS rate, if the receiver of money fails to furnish PAN to the deductor.

Considering the above background, we have provided below, some of the errors or issues while filing the TDS return and also suggestions for helping the assessee in ease of doing business and reduce compliance.

- Currently, TDS returns can be filed either by using offline method or online method. While the assessments and returns are now being fully automated, the submission of TDS return should also be made mandatorily online. Doing away with offline returns would save valuable time and efforts.

- For one such case, which we have observed that where a payment was made to non-resident who do not have PAN in India, tax was required to be deducted at 20% (being higher). The question was whether we need to include surcharge and cess to the rate of 20% or whether the same is already inclusive of it. Based on reading of law and various case laws, it can be concluded that rate of 20% specified is inclusive of surcharge and hence and cess. Often there are multiple interpretations on what rate to apply and whether the said rate includes surcharge and cess.

  The current format of TDS return do not provide for a comment/ remarks section in the TDS return. Providing the same would help the tax deductor to elaborate the basis on which tax has been deducted.

- Where a deductor inadvertently pay extra TDS, it can be utilised against subsequent TDS liability. However, the details of the said extra TDS paid has to be maintained by the deductor. Many times it happens, that the deductor forgot to maintain records and afterward the excess TDS paid is not set-off. they don't realise that such excess is paid and it needs to be set-off.

  Also, the TDS return does not get validated if there is any mismatch in sum of total tax as per deductee details in TDS return and total tax deposited as per challan.

- There are many parties which would have obtained lower withholding tax certificate from vendors. As a practice from FY 2019-20 onwards, the Income tax department is issuing emails to all recipients of service or goods [deductors] for a lower TDS certificate issued to their vendor(s), wherein details of deductor's TAN and an amount on which lower TDS rates will apply. In case if amount of fees/charges for that vendor exceeds the prescribed threshold limit mentioned in such lower deduction certificate, then the rate prescribed in the relevant section will apply. Hence, after receiving the lower deduction certification, the deductor has to deduct TDS at lower rate till the prescribed limit mentioned in the said certificate. Once the said limit is exceeded, deductor is liable to deduct TDS at normal rate as specified in the applicable section. In case amount on which lower deduction of TDS is made beyond the threshold amount mentioned in certificate, then default would get generated on filing of TDS return. One can also recheck the lower deduction amount issued to vendor through facility available at traces portal.

- In case of Non-resident who does not have a PAN in India, a rate of 20% as per section 206AA would apply. However, if the non-resident furnishes certain prescribed documents like TRC, name of the party, contact number, email id, etc., the rate of 206AA would not apply and DTAA benefit shall be available. The said details once entered in TDS software used at master level for the particular party, then default generation at a later stage can be avoided.

- TAN is issued to persons who are required to deduct and deposit TDS. For whatever reasons, if there is any insertion of incorrect TAN in challan, the payment of TDS made by the said deductor is not reflected and also the return is not validated.

- Many times it has been witnessed that incorrect PAN is entered in TDS return. Quoting of incorrect PAN results in non-availability of credit in hands of the deductee. Further, PAN if incorrectly quoted, can be modified only ONCE, hence ensure that PAN during second time is correctly quoted, as there is no modification allowed subsequently. Tax department has a master data base of PAN number and the holder of that PAN number, a system should be implemented whereby whenever the deductor enters PAN, the name of the party should appear against it. This will help cross check the party against the PAN number. However, certain third party software allows deductors to verify the PAN of parties, through interface with traces system, before the TDS return gets uploaded.

- In TDS return, date of TDS deposit must be the same as date of depositing of challan. If the details of challans are not entered properly, then there will be mismatch in data, such as date, serial number, BSR Code and amount of TDS. With AI tools, the income-tax can develop a system whereby the details of TDS paid and the details of challans are auto populated in the system.

- Also, while validating the TDS return, a number of minor technical errors come-up pertaining to form, Challan details and deductee annexure. Some of common errors that appear during the e-tds return filing are populated below. A pop-up providing possible solutions to the problem should also come

Line No.	Record Type	Error Code T-FV-	Description	Solution normally proposed
3	Challan	3021	Invalid Bank Challan No	This error normally occurs, if challan number or BSR code or both is given when deposited by book entry.
3	Challan	3035	Invalid Bank Branch Code	This error normally occurs when BSR code is less than 7 characters.
3	Challan	3043	Invalid Section/ Collection Code	This error normally occurs, if value of section code is incorrect/not given in Challan Detail.
5	Challan	3048	TDS/Income Tax Amount is not equal to Total Tax Deposited	This error normally occurs, if TDS/Income Tax + Surcharge + E. Cess + Others is not equal to Total Tax Deposited
3	Challan	3066	Sum of TDS/TCS-Interest Amount + TDS/TC S-Others (amount) + Total Tax Deposit Amount as per deductee annexure is greater than Total of Deposit Amount as per Challan/Transfer Voucher number	This error normally occurs where whether Total Tax Deducted is greater than Total Tax Deposited by challan. Check whether Total of TDS/TCS ~ surcharge ~ E. Cess ~ Interest in Challan detail is mismatch with deductee detail annexure.
3	Challan	3104	Invalid By Book entry/ Cash	This error normally occurs, where challan number if not given, and select no in 'Deposited by Book Entry'. Delete challan no. and Bank BSR code if deposited by book entry.

Line No.	Record Type	Error Code T-FV-	Description	Solution normally proposed
3	Challan	3115	Invalid Cheque/DD number	This error normally occurs, where the value of Cheque/ DD No. present in Challan Detail Table. If deposited in Cash then give value 0 in Cheque/DD No. column.
4	Deductee	4010	Invalid PAN Reference number	This error normally occurs, where value is given in PAN reference No. Column when given PAN number in deductee detail table is given.
4	Deductee	4020	File Does Not Exist/ Empty	This error normally occurs where the correct file name is not provided. Ideally file name should start with alphabet.
4	Deductee	4098	Invalid Date on which tax Deducted/Collected	This error normally occurs when Date of Deduction/Collection is after quarter ending or check the date format as per s/w or check the A.Y. selected for given quarter.
4	Deductee	4212	'Date of Deposit' must be same as 'Date of Bank Challan No./ Transfer Voucher No.'	This error normally occurs, where date of Challan and Date of Tax Deposited are different.

Taxation of Income from Financial Instruments


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Introduction

With a considerable increase in investment in financial instruments over the past few years, it has become important for each of us to be aware about the basic provisions of Income Tax Act, 1961 (the Act) dealing with taxation of income from financial instruments.

But, before we divulge into the taxation aspect, let us first understand what financial instruments are and what factors decide the taxation of income arising therefrom?

Financial instruments (FI)

i. Are monetary contracts between parties.

ii. They can be created, traded, modified and settled.

iii. They can be cash or evidence of an ownership interest in an entity or a contractual right to receive or deliver in the form of currency, debt, equity, or derivatives.

Thus Financial Instruments are real or virtual documents representing a legal agreement involving any kind of monetary value & thus are assets that can be traded, or they can also be seen as packages of capital that may be traded.

Financial instruments can be classified as cash instruments and derivative instruments. These FI may be classified as debt-based or equity based. While Some of these instruments may be listed on stock exchanges for trading purposes.

Financial instruments broadly include assets like shares, debentures, bonds, units, exchange traded funds, derivatives, crypto currencies etc. The inherent nature of each of these instruments help in deciding the taxability of income from these assets.

Income arising from investment in financial instruments include gains on sale of investment and interest or dividend received during the period on investment. These incomes are generally taxed under the heads, Capital Gains and Income from Other Sources. However, in some cases, where a person is into business of trading of financial instrument, the income arising therefrom may be taxed under the head, Profit and Gains from Business or Profession.

Every financial instrument (other than cash and similar instruments) fall within the definition of Capital assets as defined under section 2(14) of the Act, unless specifically excluded. In fact, even crypto currencies are covered under the definition of capital asset since they have not been specifically excluded.

Accordingly, listed equity shares are taxed differently as compared to non-listed equity shares, preference shares are taxed differently as against equity shares, debt instruments are taxed differently as against equity instruments, instruments held for longer period are taxed differently as against those held for shorter period and so on.

The residential status of the assessee also become a critical aspect while deciding the rate and manner of taxation of income from such instruments.

In this article, we will discuss taxation of different types of income from each of the following financial instruments:

(a) Equity shares of a company listed on a recognized stock exchange

(b) Units of an equity oriented fund

(c) Units of a business trust

(d) Equity shares in a company not listed on recognized stock exchange

(e) Futures and Options

(f) Debt oriented mutual funds

(g) Bonds & Debentures

(h) Gold ETF

For better discussion and understanding, we have grouped instruments appearing at (a), (b) and (c) together as the income arising therefrom are taxed in a similar manner under the Act.

I. Equity share of a company listed on a recognized stock exchange, Units of an equity oriented fund and Units of a business trust:

Equity shares represent ownership interest in a company. Individuals who hold equity shares are said to hold fractional ownership of a company. Equity shares of a company may be listed or unlisted. The taxation under the Act shall vary considering if they are listed or not and more so specifically on a recognized stock exchange[1].Taxation of income from shares shall also vary based on whether Securities Transaction Tax (STT) is paid on the acquisition or transfer or both.

An **equity-oriented fund** invests predominantly in equity stocks. As per the regulations of SEBI, an equity mutual fund scheme must invest at least 65 percent of the scheme's assets in equities and equity-related instruments. STT is payable on equity-oriented funds at the time of redemption of units.

A **business trust** as defined under section 2(13A) of the Act is either an Infrastructure Investment Trust (InvIT) or a Real Estate Investment Trust (REIT). These trusts are like mutual funds that raise resources from many investors to be directly invested in realty or infrastructure projects. Up to March 31, 2020, the definition of business trusts under the Act included only listed InvITs and REITs registered with SEBI. But with effect from April 1,2020, it includes unlisted InvITs and REITs registered with SEBI as well.

The Various Tax Impact on the above stated Class of Investments is discussed hereunder :

a) Capital Gain

The chargeability to capital gains is under section 45 of the Act, which arises only upon the transfer of a capital asset and the word "transfer in relation to Capital asset has been defined in section 2(47) of the act. However the exception to the definition of transfer is provided in section 47 of the act.

For calculating capital gains, an important aspect to be looked into is the period of holding. **Period of holding** as defined under section 2(42A) of the Act read with its first proviso states that for equity shares and unit of an equity-oriented fund

1. Recognized stock exchange shall be the recognised stock exchange as referred to in clause (f) of section 2 of the Securities Contracts (Regulation) Act, 1956 and which fulfils such conditions as may be prescribed and notified by the Central Government for this purpose.

to be considered as short-term capital assets, they must be held for not more than 12 months i.e. 1 year, Whereas in case of units in business trust the period of holding is less than 3 years, the assets would be considered as short-term assets. Accordingly, if these assets are held for more than 1 year or 3 years as stipulated hereinabove, then the assets are to be considered as long-term capital assets.

Capital gain arising on transfer of **short-term assets**, being equity shares of a company or a unit of equity oriented fund or a unit of business trusts is governed by section 111A of the Act. Under this section, income tax at the rate of 15% is chargeable on capital gain arising on sale of these short-term capital assets. The only condition is securities transaction tax (STT) must have been paid on transfer (sale) of these assets.

Till March 31, 2018, transfer of **long-term capital assets**, being equity shares of a company listed on a recognized stock exchange or an unit of equity oriented fund or an unit of business trusts was fully exempt under section 10(38) of the Act, which created biased against manufacturing activity and encouraged diversion to investment in financial assets. The problem was further compounded by abusive use of tax arbitrage opportunities created by these exemptions. To overcome such situation, vide insertion of a new **section 112A** of the Act, tax was introduced at the rate of 10% on such gains earned with effect from April 1, 2018. Such tax would be payable only on gains of over ₹ 1,00,000/.

But due to such sudden change in the tax scheme, the financial markets of India could take a huge hit and the prices of the stocks would crash. As the budget came before the start of the previous year, the people would try to sell all their stock before the end of financial year 2017-18 to avoid tax on long term capital gains in financial year 2018-19. To tackle such situation and to tax such long term capital gain, a unique taxation policy of Grandfathering provision was brought in action based on the fair market value (FMV) on the day before the Budget 2018 was announced i.e January 31, 2018:

Under the grandfathering provisions, the taxpayers are allowed to consider the market price of the asset as on 31/01/2018 to be the cost of acquisition instead of the actual cost of acquisition, if the former is higher than latter[2]. Accordingly, if a capital asset being taxed under the new section 112A was purchased before February 1, 2018, then the cost of acquisition will be calculated as follows:

Cost of acquisition will be ***higher*** of Step 1 and 2:

Step 1: Actual cost of acquisition			XXX
Step 2: *Lower* of:			
a)	FMV as on 31/01/2018	XX	
b)	Full Value of Consideration	XX	XXX

For calculating the above cost of acquisition in the case of a listed capital asset, FMV shall be the highest price of the capital

2. Clause (ac) of section 55(2) of the Act.

asset quoted on the exchange on January 31, 2018 or where there is no trading in such asset on such exchange on January 31, 2018, the highest price of such asset on such exchange on a date immediately preceding 31st January, 2018 when such asset was traded on such exchange. In a case where the capital asset is a unit and is not listed on recognized stock exchange, the net asset value of such asset as on 31st January, 2018.

W.E.F 01/04/2018, the benefit of Indexation, to the resident as well non-resident assessee, shall not be available to the class of assets covered u/s 112A i.e. to the class of assets to whom the above stated the Grandfathering clause applies.

To simply Put together the taxation in respect of class of assets where STT paid is as per the following Chart

Particulars	Equity share in a company	Unit of an equity-oriented fund	Unit of a business trust
Short Term Capital Gains **Section 111A – 15%**			
Period of Holding	<=1 yr	<=1 yr	<=3 yrs
STT must be paid on	Transfer only	Transfer only	Transfer only
In case of Resident Individual/ Resident HUF, they shall get the benefit of basic exemption if their total income (excl. STCG) falls below maximum amount not chargeable to tax. After setting off such differential amount against STCG, the remaining STCG will be taxed @15%.			
Long Term Capital Gains **Section 112A – 10%**			
Period of Holding	>1 yr	>1 yr	>3 yrs
STT must be paid on	Acquisition (if acquired after 1.10.2004) and Transfer (in all case)	Transfer only	Transfer only

In case of **short-term capital gain** arising on sale of any of the above assets when **STT is not paid** on transfer, the short-term capital gain shall be taxed at the slab rates as applicable to the assessee.

In case of **long term capital gain** arising on account of transfer of shares of company listed on a recognized stock exchange, where **STT is not** paid on acquisition (if acquired after October 1, 2004) or on transfer, it shall be taxed under section 112 of the Act and the benefit of Indexation shall be available to the assessee and will be taxed @ 20%. However, the benefit of Indexation is not available to Non

Resident assessee, where such assets are acquired in the foreign currency.

The provisions in respect of taxation of shares of company not listed on a recognized stock exchange and the first and second proviso to section 48 of the Act is discussed at sr no II below.

It is important to note that the **benefit of deduction under chapter VIA** of the Act cannot be claimed against capital gain taxable under section 112A of the Act and the **rebate under section 87A** of the Act is not available against tax payable on such capital gain.

Benefits of concessional rates given under section 111A and section 112A of the Act can be availed, also if the transaction is undertaken on recognized stock exchange located in **International Financial Services Centre** and the proceeds of the same are received in foreign currency, even though STT is not paid on such transactions.

Though the rate of **surcharge** in case of a person being an individual, HUF, association of persons, body of individuals or artificial juridical person may be as high as 37% (depending on the income level), the rate of surcharge on the income taxable as per section 111A and 112A of the Act shall not be more than 15%.

b) Gains on Buyback

Buyback of shares ordinarily means repurchasing of shares previously issued by the company. Such repurchasing is done by the company for various reasons.

Until July 5, 2019, the gain on buyback of shares of listed companies was taxed in the hand of the shareholders. Budget 2019 amended section 115QA of the Act to include all buybacks announced by listed companies after July 5, 2019 under the buyback tax. Now buyback tax at the rate of 20% is payable by the listed companies on income distributed vide buyback.

Before buyback tax was applicable to listed companies, the shareholder was liable to pay tax on the gains on buyback. Since STT was not paid on buyback, the capital gains would be taxable in the same fashion as gains on sale of shares of listed company where STT is not paid. With the applicability of buyback tax, the gains are no longer taxable in the hands of the shareholders. Section 10(34A) of the Act specifically exempts income arising to assessee, being a shareholder, on account of buy back of shares by the company on which buy back tax is paid by the company under section 115QA of the Act.

c) Business Income

Buying and selling of listed shares may or may not be delivery based. Usually when shares are bought and sold of stocks on the same day, the trader does not receive actual delivery of shares in the demat account. Taxation of such intra-day trading is different from regular trading in shares. Let us understand their taxation individually.

i. Trading in equity shares of company listed on recognized stock exchange

Buying and selling of equity shares does not always amount to capital gain. The Central Board of Direct Taxes (CBDT) through instruction no. 1827, dated August 31, 1989 had brought to the notice of the Assessing Officers that there is a distinction between shares held as investment which is a capital asset and shares held as stock-in-trade which is a trading asset. Further circular no 4/2007 dated June 15, 2007 clarified that it is possible for a taxpayer to have two portfolios, i.e., an investment portfolio comprising of securities which are to be treated as capital assets and a trading portfolio comprising of stock-in-trade which are to be treated as trading assets. Where an assessee has two portfolios, the assessee may have income under both heads, i.e., capital gains as well as business income.

Disputes, however, continued to exist on the application of these principles to the facts of an individual case since the taxpayers found it difficult to prove their intention in acquiring such shares/securities. CBDT on realizing that major part of shares/securities transactions takes place in respect of the listed ones and with a view to reduce litigation and uncertainty in the matter, it partially modified the aforesaid Circulars. Vide Circular No. 6/2006 dated February 29, 2006, it further instructed that where the assessee itself, irrespective of the period of holding of the listed shares and securities, opts to treat them as stock-in-trade, the income arising from transfer of such shares/securities would be treated as its business income. It further instructed that in respect of listed shares and securities held for a period of more than 12 months immediately preceding the date of its transfer, if the assessee desires to treat the income arising from the transfer thereof as Capital Gain, the same shall not be put to dispute by the assessing officer. However, this stand, once taken by the assessee in a particular assessment year, shall remain applicable in subsequent assessment years also and the taxpayers shall not be allowed to adopt a different/contrary stand in this regard in subsequent years. The circular however does not cover unlisted shares and securities and thus each case shall be individually decided on merits and litigation may prevail.

Upon treating these transaction as Business Income, the assessee can claim all expenses which are incurred in earning such business income. In such cases, the profits would be added to your total income for the financial year, and consequently be taxed at slab rates as applicable to the assessee.

However, in case companies, which incurs losses on the transactions of purchase and sale the Explanation to section 73 comes into play which creates a fiction that the loss suffered by certain companies from the business of purchase & sale of shares shall be deemed to be speculation loss. The Explanation is not inconsistent with the object of introduction. The CBDT Circular dated 24.7.1976 cannot be treated as guide for interpretation of S. 73 when the provision is very clear and free from any ambiguity. The fact that the Explanation to S. 73 was introduced to curb manipulation does not mean that it has to be confined to only those cases in view of the clear language of the provision. The definition of "speculative transaction" in S. 43(5) is not applicable to the Explanation to S. 73.

Also, another aspect which must be looked into is the calculation of turnover of the business. The turnover shall be the sale consideration of the shares sold that have been considered as stock-in-trade. The provisions of tax audit shall be applicable based on the turnover and other several conditions.

ii. *Intra-day trading*

All intraday transactions (long and short) are squared off by the end of the trading day. In such a case, the trader does not take actual delivery of shares. The intention is not to invest but to earn profits from fluctuations in prices of the stock. The activity is purely speculative in nature. Section 43(5) of the Act states that a transaction of purchase or sale of a commodity including stocks and shares settled otherwise than by actual delivery or transfer of the commodity or scrip is a speculative transaction. Thus, profits or losses from intra-day trading shall always be classified as speculative.

No special tax rate has been provided for speculative profits. It is taxed at slab rate as applicable to the assessee. In case of speculative losses, the losses can be set off only against speculative profits. In case, there are no profits from speculative business in the relevant year, the losses can be carried forward only for 4 years and can again be set off only against speculative profits.

Turnover in case of intra-day trading shall be calculated as per Para 5 of "Guidance Note on Tax Audit under Section 44AB of the Income Tax Act,1961" issued by the Institute of Chartered Accountants of India (ICAI), which states that for speculative transactions, the turnover is net of all positive and negative income from various transaction and not total of all sales transaction.

Eg: On day 1, Mr. A buys 1,000 shares of ABC Ltd at Rs.10 per share and sells them at Rs.15 per share at the end of the day, earning a profit of Rs.5,000/-. On day 2, he buys 1,000 shares of XYZ Ltd at Rs.20 per share and sells them at Rs.18 per share at the end of the day, incurring a loss of Rs.2,000/-. The turnover of Mr. A shall be Rs.7,000/-.

The provisions of section 44AB (tax audit) and section 44AD (presumptive taxation) of the Act shall be applicable based on the turnover so calculated and other several conditions.

d) Dividend

Each of the assets under this Class, distribute profits by way of dividends.

Till 31st March, 2020, tax on dividend distributed by domestic company or specified company or mutual funds was exempt in the hands of shareholder/unitholder as the company or the mutual fund had to pay Dividend Distribution Tax (DDT) under section 115-O of the Act at the rate of 15% (plus surcharge and cess). This provision was introduced in 2003 as it was easier to collect tax at a single point.

But this provision levied tax at a flat rate on the distributed profits, across the board irrespective of the marginal rate at which the recipient is otherwise taxed and also did not allow the foreign investors to take credit of such taxes paid in their residence or source country (since they were not considered as income-tax paid by the investor on their income in India). Accordingly, to address the issue with the support of advanced technology and higher reporting requirements which helps in easy tracking of the investors at the relevant time, dividend as well as income from units are now taxable in the hands of shareholders or unit holders at the applicable rate. But if the recipient is a non-resident/ foreign company, dividend will be taxed at the rate 20% (subject to DTAA) as per section 115A of the Act. Thus, now the domestic company or specified company or mutual funds are not required to pay any DDT.

Prior to the above amendment, any dividend received by a resident individual, HUF or partnership from a domestic company was liable to 10% tax if the dividend amounts exceeding Rs.10 lakhs. Post amendment, the said provision of section 115BBDA are not applicable. However, note that as per section 115BBDA of the Act, if the domestic company had declared dividend before 1st April, 2020 but the dividend was distributed on a later date, it shall still be covered by previous tax provision i.e. it shall be exempt under section 10(34) of the Act up to Rs.10 lakhs and any dividend received above Rs.10 lakhs shall be taxable at the rate of 10% under section 115BBDA of the Act. In such a scenario, the company shall be liable to pay DDT under section 115-O of the Act.

Now, since the exemption on dividend income under section 10(34) and 10(35) of the Act has been omitted and the dividend has been made taxable in the hands of recipient, deduction of expense incurred to earn such income is permissible under section 57 of the Act, subject to the nature and quantum of such expenses that can be claimed as deduction. The allowable expenses shall only be in respect of interest expense and deduction of such expense must not exceed 20% of the dividend income before such deduction.

Section 80M of the Act provides deduction against inter-company dividends. Such provision was part of the Act even earlier but was deleted with introduction of DDT to remove the cascading effect. But now since tax is payable by recipient and DDT is not payable by the company, the section has been re-introduced. According to this section, if a domestic company receives dividend from another domestic company and former declares dividend, then deduction shall be allowed of lower of the following amounts:

i.	Aggregate dividend received (includes deemed dividend)	XX
ii.	Dividend distributed to shareholder	XX

Also note that, to claim this deduction, the dividend by the company must be distributed atleast 1 month prior to the due date of return filing under section 139(1) of the Act.

II. Equity shares in a company not listed on recognized stock exchange

Equity shares as discussed above may not always be listed on a recognized stock exchange. This includes shares of company of private company as well as shares of public company which are not listed on a recognized stock exchange.

a) Capital Gain

Section 2(42A) of the Act read with its third proviso defines the period of holding and states that equity shares in a company not listed on a recognized stock exchange which are held for a period of less than 24 months i.e. 2 years, will be classified as Short Term Capital Asset. In case such shares are held for more than 2 years, they shall be considered as Long-Term Capital Asset.

No special provision of tax rate is made for capital gain from short-term capital assets on such shares & thus, it is subject to tax as per assessee's respective slab rate.

However, in case of long term capital gain on such shares, section 112 of the Act shall apply. Under section 112 of the Act, in case of such asset being transferred, long term capital gain is taxed at the rate of 20% post the benefit of indexation under the second proviso to section 48 of the Act.

In case of an assessee being non-resident, the benefit of first proviso to section 48 of the Act gives the assessee the benefit of converting the sale consideration and cost of acquisition on account of such assets into the same foreign currency as was initially utilized to purchase the shares, while computing the capital gains and the resultant gains is then converted into Indian rupee for calculating applicable taxes. This proviso is applicable while calculating both short-term and long-term capital gains.

There shall not be any change in tax rate for short term capital gain in this case. However, in case of long term capital gain shall be Chargeable to tax @ 10% section 112(1)(c)(iii) of the Act and the aforesaid benefit i.e the benefit of the 1st and 2nd proviso to S. 48 shall not be available.

b) Gains on Buyback

Buyback tax under section 115QA of the Act was introduced by the Finance Act 2013. As per the said section, the unlisted companies are liable to pay tax at the rate of 20% on income distributed by the company through the buyback of shares. The gains arising from such buyback is exempt in the hands of the shareholder under section 10(34A) of the Act.

c) Dividend

Dividend received on account of equity shares held in a company not listed on recognized stock exchange is taxed in the same manner as that received on account of equity shares held in a company listed on recognized stock exchange, discussed above.

III. Futures and Options

A derivative is a financial instrument whose value is derived from an underlying asset. It has no value of its own. Futures and Options of commodity, stocks and indices that are traded on Indian stock exchanges are the most popular form of derivatives in India.

On the face of it, trading in futures and options seem to be speculative transactions. But since these instruments are used for hedging and also for taking/giving delivery of underlying contract, trading in derivatives has been specifically excluded from the definition of speculative transaction under section 43(5) of the Act. Even though currently almost all equity, currency, & commodity contracts in India are settled in cash, but by inherent nature they give rise to giving/ taking delivery. There are also a few commodity future contracts like gold and almost all agri-commodity contracts with delivery option to it.

With such specific exclusion, even intra-day trading in these instruments shall not be speculative activity. Thus, trading in futures and options shall specifically be considered as business income and not speculative income.

Similar to intra-day trading, turnover in case of trading in futures shall be calculated as per Para 5 of "Guidance Note on Tax Audit under Section 44AB of the Income Tax Act,1961" issued by the Institute of Chartered Accountants of India (ICAI), which states that for Derivative , future and options, the turnover is net of all positive and negative income from various transaction and not total of all sales transaction. In case of trading in options, premium received on sale of options is to be included in turnover.

The provisions of section 44AB (tax audit) and section 44AD (presumptive taxation) of the Act shall be applicable based on the turnover so calculated and other several conditions.

IV. Debt oriented mutual funds

A debt oriented fund is a mutual fund scheme that invests in fixed income instruments, such as corporate and government bonds, corporate debt securities, and money market instruments etc. that offer capital appreciation.

a) Capital Gain

As per section 2(42A) of the Act, units of debt mutual fund are considered as short term assets when the period of holding is not more than 36 months i.e. 3 years. If the period of holding of units of debt mutual fund is more 3 years, they are considered as long-term capital assets.

Capital gain on transfer of such short-term capital asset shall be taxed according to the slab rate as applicable to the assessee & No special rate of tax has been provided. As per section 112 of the Act, in case of capital gain on transfer of such long-term asset, tax at the rate of 20% shall be payable after availing the benefit of indexation.

In case of a non-resident and a foreign company, there shall be no additional benefit while calculating short term capital gains. Taxation of long term capital gain on transfer of units of debt oriented mutual fund for both non-resident and foreign company shall be the same as taxation of gains on account of transfer of shares of a company not listed on recognized stock exchange by a foreign company.

b) Dividend

Dividend received on account of debt oriented mutual funds is taxed in the same manner as that received on account of equity shares held in a company listed on recognized stock exchange.

V. Bonds & Debentures

A bond or a debenture is a fixed income financial instrument that represents a loan made by an investor to a borrower. They are used by companies and governments to finance projects and operations. Details of the bond/debenture include the end date when the principal of the loan is due to be paid to the bond/debenture owner and usually includes the terms for variable or fixed interest payments made by the borrower.

a) **Capital Gain**

As per section 2(42A) of the Act, classification of bonds/debentures into long-term and short-term capital assets varies based on the period of holding as well as based on whether it is listed on a recognized stock exchange or not. In case of bonds/ debentures listed on recognized stock exchange, if the period of holding is not more than 1 year, then they are considered as short-term capital asset. In case of bonds/ debentures not listed on recognized stock exchange, only if the period of holding is not more than 3 years, they are considered as short-term capital asset. In all other cases, they are treated as long term capital asset.

Capital gain on transfer of bond/ debenture being short term capital asset is taxed at the slab rate applicable to the assessee.

As per fourth proviso to section 48 of the Act, indexation on long term capital asset is available only on two types of bonds i.e. capital indexed bonds issued by government and Sovereign Gold Bond issued by the Reserve Bank of India under the Sovereign Gold Bond Scheme, 2015. These bonds are always listed on recognized stock exchange. Thus, long-term capital gain on transfer of such bonds are to be taxed at 20% along with indexation benefit as per section 112 of the Act which as per first proviso to section 112 of the Act or shall be restricted to maximum of 10% of **long-term** capital gain calculated without claiming the benefit of indexation under second proviso to section 48 of the Act. But in a case where Sovereign Gold Bonds are redeemed by an individual at the end of the tenure of the bond, no tax shall be payable at the time of redemption since such redemption is excluded from the definition of transfer under section 47(viic) of the Act.

In case of other listed bonds/ debentures including zero coupon bond, long-term capital gain will be taxed at the rate of 10% as per first proviso to section 112 of the Act.

Long-term capital gain arising on account of transfer of other unlisted bonds/debentures shall be taxed at the rate of 20%, as per section 112(1) of the Act.

Any gain arising due to forex fluctuation on **redemption** of the rupee denominated bonds of an Indian Company to a non-resident is not chargeable to tax, as per fifth proviso of section 48.

b) **Interest**

Interest on Bonds is taxed at slab rate as applicable to the assessee except interest received on tax free bonds which is exempt under section 10(15)(iv)(h) of the Act.

VI. Gold ETF

Gold Exchange Traded Fund (ETF) is a commodity-based mutual fund that invests in gold. These ETFs perform like individual stocks and are traded similarly on the stock exchange. The price of these units are based on the actual gold prices. An investor invests in stock instead of the actual metal, and once it is bought, they are credited with the equivalent units instead of actual gold. One Gold ETF unit is equal to 1 gram of gold and is backed by physical gold of very high purity. No interest or dividend is paid on these units.

For the units of Gold ETF to be considered as short-term capital asset, the period of holding is less than 36 months. If the period of holding is 36 months or more, than the same are classified as long-term capital asset.

Capital gains arising on transfer of short-term capital asset being Gold ETF shall be taxable at the slab rate as applicable to the assessee.

In case of capital gains arising on transfer of such long term asset, the gains calculated after claiming the benefit on indexation under the second proviso to section 48 of the Act shall be taxed at the rate of 20% under section 112 of the Act.

Reader may note that we have not covered provisions dealing with specific situation such as ESOP, sweat equity, dividend stripping, bonus stripping and hybrid and other complex financial instruments considering that the article is addressed to a larger and younger sections of society. It has been conveyed that the taxation of crypto currencies shall be covered in a later issue of Jignyasa and hence the same is also not covered by us.

Report on Law Orientation Course

The **Student Committee of the Chamber of Tax Consultants** organised the webinar series **"Legal Practice Orientation Course – from Classroom to Courtroom"** for Students, Young Professionals and anyone who desired to understand the legal field from a practitioner's perspective starting from 20th November, 2020 to 6th December, 2020.

This course was designed to provide a glimpse into the practical aspects of the legal profession in India. The distinguished speakers acquainted the participants with concepts which are required to bridge the gap between academic knowledge and the actual practice of law.

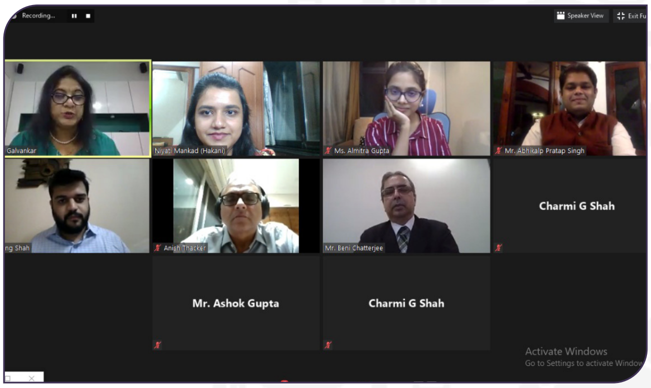
This webinar series in its first year received an overwhelming response from **118 persons from all over India**. In view of the COVID-19 Pandemic, the course was held on e-platform of Zoom.

The course comprised of 8 topics, each of which were conducted by various legal luminaries. This course awarded the participants an opportunity to not only get access to the first-hand information and experience of our distinguished speakers but also an opportunity to interact with them. Following were the topics and speakers for the course:

SR. NO.	TOPICS	SPEAKERS
1.	Overview & Opportunities In Legal Field	Panel of :- - Mr. Beni Chatterjee, Senior Advocate - Mr. Ashok Gupta, Chief Legal Officer, Aditya Birla Group - Mr. Abhikalp Pratap Singh, Adocate on Record, SC and - Ms. Almitra Gupta, Associate at Linklaters, Singapore, Solicitor- Bombay Incorporated Law Society and Member of New York Bar Association
2.	Selected Topics of Interpretation of Statutes	Mr. V. Sridharan, Senior Advocate
3.	Civil and Commercial Law Practice and Procedure	Mr. Prakash Shah, Advocate & Solicitor and Mr. Jas Sanghavi, Advocate
4.	Law of Writs in India	Mr. Girish Godbole, Advocate (Former Judge of Bombay High Court)
5.	Criminal Law Practice and Procedure	Mr. Niranjan Mundargi, Advocate

SR. NO.	TOPICS	SPEAKERS
6.	General Corporate Law Practice in India	Ms. Anuradha Iyer, Advocate & Solicitor
7.	Alternate Dispute Resolutions	Mr. Ankoosh Mehta, Advocate & Solicitor
8.	Drafting & Conveyancing	Mr. Murtuza Federal, Advocate & Solicitor

All the participants were awarded a Certificate of Participation at the end of the course.



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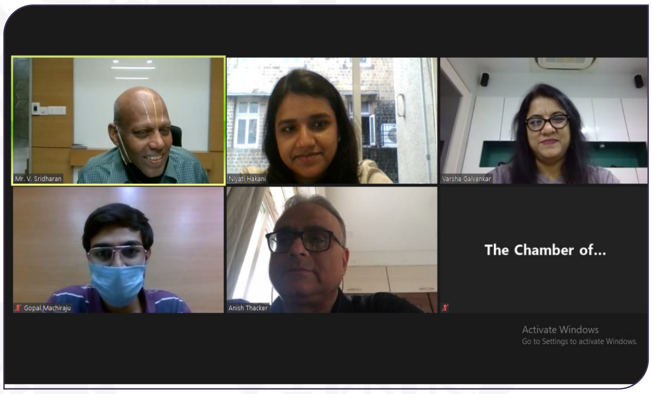

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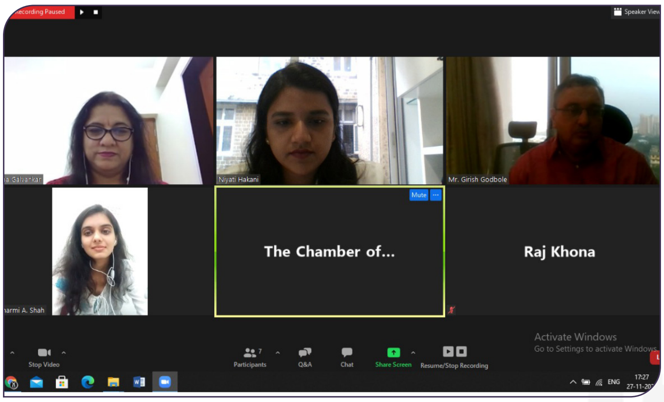

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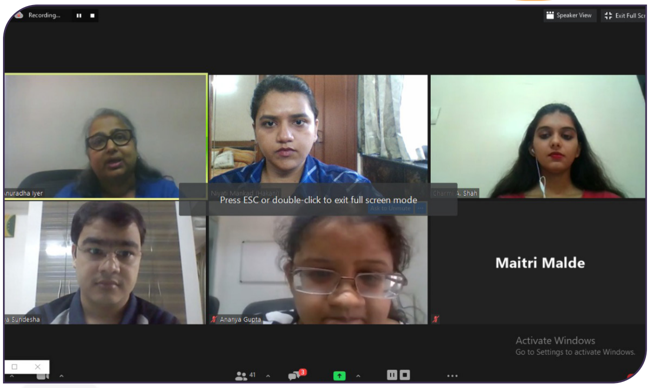

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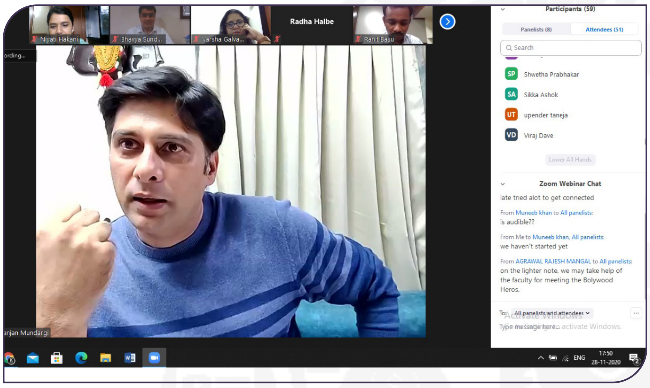

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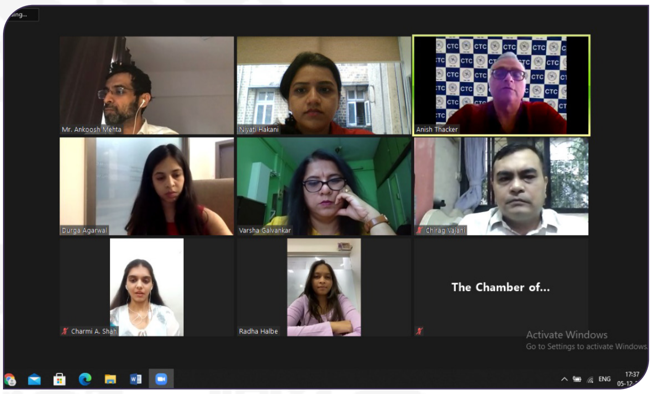

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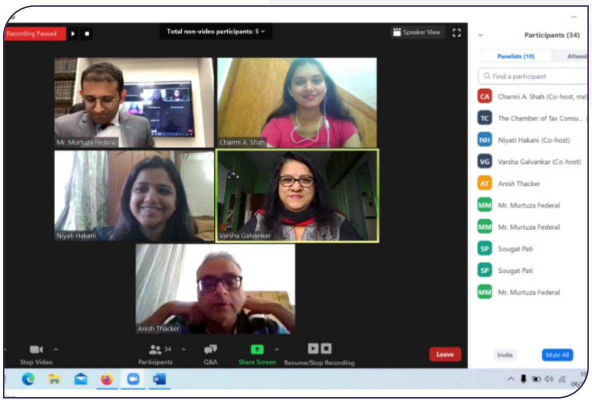

The Chamber of Tax Consultants

Estd. 1926

Vision Statement

The Chamber of Tax Consultants (The Chamber) shall be a powerhouse of knowledge in the field of fiscal laws in the global economy.

The Chamber shall contribute to the development of law and the profession through research, analysis and dissemination of knowledge.

The Chamber shall be a voice which is heard and recognised by all Government and Regulatory agencies through effective representations.

The Chamber shall be pre-eminent in laying down and upholding, among the professionals, the tradition of excellence in service, principled conduct and social responsibility.

Unveiled by Shri S. E. Dastur, Senior Advocate on 30th January, 2008.

JIGnyasa

THE CHAMBER OF TAX CONSULTANTS

Estd. 1926

HEAVEN BE OUR GUIDE

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