

# BUDGET ANALYSIS 2020

## **KKGS and Co., Chartered Accountants**



We are glad to present the Budget analysis of FY 2020-21. Our Budget analysis focuses on Direct Tax and Indirect tax amendments.

Unless otherwise specified all amendments are applicable effective 01 April 2020.

We hope you shall find this analysis useful and we also solicit your feedback to improve upon our service portfolio.

### **Our Offices:**

1. Plot No.22, Abhi -Ani Terrace,  
RF - 6, First Floor,  
Gangai Amman Koil 4th Street,  
Vadapalani, Chennai - 600026.  
Phone: 044 - 43805316  
**Email:** [www.kkgsandco.com](http://www.kkgsandco.com)  
[somug@kkgsandco.com](mailto:somug@kkgsandco.com)  
[kamaleshak@kkgsandco.com](mailto:kamaleshak@kkgsandco.com)
2. Door No. 10/19, Kumaran Rice  
Mill, Kasimajorpuram  
Nannagaram Road, Courtallam,  
Tenkasi - 627802.
3. Door No. 33-14-5b,  
Kadiyalavari Street,  
Sitaramapuram,  
Vijayawada - 520002.

# Budget Analysis 2020

## Contents

1	Direct Tax Rate Amendments .....	3
1.1	Options - Old Tax Regime and New Tax Regime .....	3
1.2	Tax Rates Individuals / HUF - Old Regime .....	3
1.2.1	Surcharge on Individuals .....	3
1.3	Tax Rates for Individuals / HUF – New Regime .....	3
1.3.1	Surcharge on Individuals .....	4
1.4	Tax Rates for Cooperative Societies .....	5
1.5	Corporate tax rates .....	5
1.5.1	Surcharge on Income Tax .....	5
2	Direct Tax – Other Amendments .....	6
2.1	Salaries .....	6
2.2	Income from Business or Profession .....	6
2.3	Capital gains .....	6
2.4	Residential Status .....	7
2.5	Source of Income .....	7
2.6	Weighted Deductions / Charitable Institutions and Trusts / Donations .....	8
2.7	Transfer pricing and DTAA .....	9
2.8	TCS Provisions .....	9
2.9	TDS Provisions .....	10
2.10	Abolition of Dividend Distribution Tax .....	11
2.11	Amendments Consequent to abolition of DDT .....	11
2.12	Shifting Due dates for certain Reports / Certification .....	11
2.13	Assessment / Appeal Proceedings .....	12
2.14	Penal provisions .....	12
2.15	Others .....	12
3	Indirect taxes – GST .....	13
3.1	General .....	13
3.2	Retrospective Amendments .....	13

# Budget Analysis 2020

## 1 Direct Tax Rate Amendments

### 1.1 Options - Old Tax Regime and New Tax Regime

Individuals, HUFs, BOI, AOP, Co-operative Societies have been given couple of options to choose while paying taxes.

### 1.2 Tax Rates Individuals / HUF - Old Regime

Category of Assessee	Exempt Slab	5% Slab	20% Slab	30% slab
Individuals not covered below	< = 2.50 Lakhs	>2.50 Lakhs < =5Lakhs	>5 Lakhs < =10 Lakhs	> INR 10 Lakhs
Resident Senior Citizens (60 Years and above)	< = 3 Lakhs	>3 Lakhs < = 5 Lakhs		
Resident Super Senior Citizens (80 Years and above)	< = 5 Lakhs	NA		

Tax Rebate u/s 87A for individuals is increased from INR 2,500 to INR 12,500 for those who has a total Taxable income of less than INR 5,00,000 enhanced from INR 3,50,000

#### 1.2.1 Surcharge on Individuals

Category of Assessee / Income Range	Surcharge on Income Tax (all in INR)				
	< = 50 Lakhs	TI > 50 Lakhs and < 100 Lakhs	TI > 100 Lakhs and < 200 Lakhs	TI > 200 Lakhs and < 500 Lakhs	TI > 500 Lakhs
Individuals, HUF	Nil	10%	15%	25%	37%

Benefit of Marginal Relief is available only on surcharge on the amount of income that exceeds the INR 50 Lakhs or INR 100 Lakhs or INR 1,000 Lakhs as applicable.

Health and Education Cess on income-tax continue to be levied at 4% and shall be applied on the aggregate of Income tax and Surcharge.

### 1.3 Tax Rates for Individuals / HUF - New Regime

Income Tax Slabs	New Tax Rate	Existing Tax Rate
Upto 2.50 Lakhs	Exempt	Exempt
2.50 - 5 Lakhs	5%	5%
5 - 7.50 Lakhs	10%	20%
7.50 - 10 Lakhs	15%	20%
10 - 12.50 Lakhs	20%	30%
12.50 - 15 Lakhs	25%	30%
Above 15 Lakhs	30%	30%

# Budget Analysis 2020

## Following exemptions / deductions / Reliefs to be foregone to qualify for above tax rates

1. Leave travel concession as contained in clause (5) of section 10;
2. House rent allowance as contained in clause (13A) of section 10;
3. Other than the prescribed allowances as contained in clause (14) of section 10;
4. Allowances to MLA, MPs etc. – clause (17) of Section 10
5. Exemption of Income of other person taxed in self INR 1,500 – clause (32) of Section 10
6. Exemption of Income from SEZ units Section 10AA
7. Standard deduction of INR 50,000 u/s 16;
8. Employment/professional tax deduction as contained in section 16;
9. Interest under section 24 in respect of self-occupied or vacant property referred to in sub-section (2) of section 23. (Loss under the head income from house property for rented house shall not be allowed to be set off under any other head and would be allowed to be carried forward as per extant law);
10. Any deduction under chapter VI-A ; [except 80CCD(2) - NPS Contribution by the employer] and 80JJAA – Addl employment
11. Additional Depreciation
12. Weighted Deduction
13. Brought forward loss in respect of the above
14. Others as prescribed

If the Assessee has business Income, the option to opt for new tax regime once exercised shall be applied for all subsequent years unless the conditions are not met, wherein he will be subject to tax at rates as per Old regime and he shall never opt for taxation under the new regime. He can change options only if he ceases to undertake business.

If the Assessee does not have business Income, the option of Old or new tax regime can be exercised year on year.

### 1.3.1 Surcharge on Individuals

Category of Assessee / Income Range	Surcharge on Income Tax (all in INR)				
	< = 50 Lakhs	TI > 50 Lakhs and < 100 Lakhs	TI > 100 Lakhs and < 200 Lakhs	TI > 200 Lakhs and < 500 Lakhs	TI > 500 Lakhs
Individuals, HUF	Nil	10%	15%	25%	37%

Health and Education Cess on income-tax continue to be levied at 4% and shall be applied on the aggregate of Income tax and Surcharge.

# Budget Analysis 2020

## 1.4 Tax Rates for Cooperative Societies

Description	Old Regime	New Regime
Income Upto INR 10,000	10%	Flat 22% after foregoing deductions and exemptions
From INR 10,001 to INR 20,000	20%	
Above INR 20,000	30%	
Surcharge on Income tax	12% on Income tax if Net Income exceeds INR 100 Lakhs	Flat 10%
Health and Education Cess on IT and SC	4%	

## 1.5 Corporate tax rates

Description	Conditions	Tax Rate
Domestic Co.	Turnover in FY 17-18 is <= INR 40,000 Lakhs	25%
Domestic Co. Sec 115BA	Set up after 01 Mar 2016 and Mfg	25%
Domestic Co. Sec 115BAA	Any existing Domestic Company foregoing weighted deductions / Addl depreciation etc.,	22%
Domestic Co. Sec 115BAB	Set up after 01 Oct 2019 and engaged in Mfg	15%
Other Domestic Co.	Not Applicable	30%
Foreign Co.	Not Applicable	40%
Partnership firms, LLPs and Local Authorities	Not Applicable	30%

Minimum Alternate Tax ("MAT") 15%

MAT is not applicable for companies opting u/s 115BAA and 115BAB

### 1.5.1 Surcharge on Income Tax

Category of Assesseees / Income Range	Surcharge on Income Tax (all in INR)		
	TI <= 100 Lakhs	TI > 100 Lakhs & < 1,000 Lakhs	TI > 1000 Lakhs
Domestic company	Nil	7%	12%
Foreign Company	Nil	2%	5%
Firms, LLP and Co-op society	Nil	12%	12%

- Surcharge for Domestic companies opting to rates u/s 115BAA and 115BAB is flat 10%
- Health and Education Cess on income-tax continue to be levied at 4% and shall be applied on the aggregate of Income tax and Surcharge.

# Budget Analysis 2020

## 2 Direct Tax – Other Amendments

### 2.1 Salaries

- Aggregate Contribution made by the employer to the account of the assessee in respect of the following in excess of INR 7.50 Lakhs per year and the Interest, Dividend or any other amount of similar nature in respect of such excess shall be taxed as Salaries
  - In a Recognised fund
  - NPS
  - In an approved superannuation fund
- Deduction of INR 1.50 Lakhs in respect of Interest on Housing loan for first time buyers of affordable house is available if loan is borrowed upto 31 Mar 21 extended from 31 Mar 20

### 2.2 Income from Business or Profession

- Tax Audit limit has been enhanced from INR 100 Lakhs to INR 500 Lakhs subject to the condition that the Aggregate of cash receipts and Aggregate of Cash payments shall not exceed 5% of such sums during the previous year.
- The Safe Harbour limit between the Actual Consideration and the Stamp duty value ('SDV') of an immovable property has been enhanced from 5% to 10% of Stamp duty value for Business taxation purposes
- Set off of accumulated losses and unabsorbed depreciation consequent to amalgamation of Banks / PSUs / Insurance companies is made available to the new company by rationalising the provisions of Section 72AA.
- Deduction of 100% of profits of eligible start ups shall be available for 3 years out of 10 years (increased from 7 years) at the option of the assessee and the ceiling limit of turnover to qualify as an eligible start up has also been enhanced from INR 2,500 Lakhs to INR 10,000 Lakhs

### 2.3 Capital gains

- Listing of units of a Infrastructure Investment Trusts and Real Estate Investment Trusts is no longer a requirement for construing the Trusts as 'Business Trust'
- Section 49 has been amended to determine the cost of units in respect of Main Portfolio, Total Portfolio and Segregated Portfolio to give effect to the SEBI's circular in December 2018.
- Tenure of holding of Main Portfolio units shall also be reckoned for the purpose of determining the nature of gains on sale of units of segregated portfolio i.e., short term or long term
- The Safe Harbour limit between the Actual Consideration and the Stamp duty value of an immovable property has been enhanced from 5% to 10% of Stamp duty value for Capital gains taxation purposes
- Cost of acquisition of an Immovable property purchased before 2001 shall be considered as the lower of the Fair Market Value and SDV as on 01 Apr 2001 for Capital Gains purposes
- Taxation of receipt of Immovable property without adequate consideration has been rationalised with the Safe Harbour limit between the Fair market value and SDV from 5% to 10%

# Budget Analysis 2020

## 2.4 Residential Status

Provisions determining Residential status of Individuals and HUF are rationalised. A screenshot of the existing and proposed provisions are narrated below:

Description	Existing	Proposed
Person of Indian Origin or an Indian citizen	Persons visiting India need to stay in India for 182 days and 365 days in the 4 previous years	Persons visiting India need to stay in India for 120 days and 365 days in the 4 preceding years
Not ordinary Resident of an Individual or Manager of a HUF	Such person is a Non Resident in India in 9 out 10 previous years or Has been in India for less than 730 days in the 7 previous years	Such person is a Non Resident in India in 7 out 10 previous years

A citizen of India not taxed in any other country because of his domicile or residence or any other criteria of similar nature; he shall be a Resident in India irrespective of his days of physical presence.

## 2.5 Source of Income

- Taxation based on Significant Economic Presence ('SEP') provisions has been deferred to AY 2022-23.
- Source of Income from India has been extended to include the following:
  - Income from Advertisement aiming at Indian customers / base
  - Income from sale of any data collated from India / customers in India
  - Income from Sale of goods or services using data collated from India
- The above is taxed in India only to the extent they are related to the Indian operations
- It has been clarified that Non resident holding shares or Interest in a Company shall not be considered as a source if such investments have been made either directly or indirectly in Category I or II foreign portfolio investors under the respective SEBI Regulations.
- Consideration received towards sale, distribution or exhibition of cinematographic films and brought to tax net in India as Royalty Income.
- Income of an Eligible Investment fund does not constitute a Business connection in India on account of its operations consequent to certain events / transactions. Aggregate participation or Investment in such funds by Indian residents shall not exceed 5% of the corpus of the fund. However, while calculating the 5%, the contribution made by the eligible fund manager upto INR 2,500 Lakhs shall not be considered.
- To qualify for not constituting a Business connection in India, by an Eligible Investment fund, the monthly average of the corpus of the fund shall not be less than INR 10,000 Lakhs. The time limit to be reckoned is 12 months as against 6 months earlier from the date of setting up of the fund in respect of the first year.

# Budget Analysis 2020

## 2.6 Weighted Deductions / Charitable Institutions and Trusts / Donations

- Institutions accepting deposits / donations / expenditure shall file an electronic form with the donor details and issue a certificate for the donation (similar to E-TDS returns and TDS Certificates) to enable the Donors to claim the deductions.
- Deduction for donations contributed is to be allowed based on returns submitted by the Donees.
- Institutions accepting donations shall be allowed a deduction u/s 35 only if the return comprising details of contributors are submitted in respect of such donations.
- Assessee eligible to claim deduction in respect of Capital expenditure on Specified business shall have the option not to claim such deduction and resort to classical depreciation claim.
- Mechanism of approvals for Eligible Institutions / funds / Donees and are summarised below
  - Institution or Fund is already approved and the approval is in vogue shall report the same within 31 August 2020 and approval shall remain valid for 5 years commencing from 01 Apr 2020
  - If such reporting is not made, the approval shall be deemed to be withdrawn for such Institution / funds / donees
  - Approved Institutions or funds for which the approval is likely to expire shall make an application atleast 6 months before the expiry of the approval.
  - Approved Institutions or funds for which the provisional approval is granted shall make an application atleast 6 months before the expiry of such approval or within 6 months from the date of commencement of specified activities whichever is earlier.
  - In any other case, atleast 1 month prior to the commencement of the previous year
- Cash donations towards Scientific Research and Rural development has been capped at INR 2,000 from INR 10,000 in line with other donations
- The registration process of the Trusts, Universities, Hospitals etc., has been rationalised to enable them to seek registration even after commencement of operations within the prescribed time and the registration granted is valid only for a specific period, post which a renewal is warranted. Application of renewal must be made at least six months prior to the expiry of the said period. Applicable from 01 June 2020.
- Certain income (interest, dividend, LTCG, etc.,) earned by Sovereign Wealth Fund subject to certain conditions specifically investing in Infrastructure activities in India including wholly owned subsidiaries of Abu Dhabi Investment Authority has been exempted
  - If investment is made prior to 31 March 2024
  - the investment is held for at least three years and
  - the investment is made in entities involved in maintenance and operation of Infrastructure facilities.



# Budget Analysis 2020

## 2.7 Transfer pricing and DTAA

- Safe Harbour Rules have earlier been applicable only for International transactions and such rules have been now made applicable to Income deemed to accrue or arise in India from any business connection in India, any property in India, any asset or source of income in India, or through the transfer of a capital asset situate in India.
- Scope of Advance Pricing Agreement is widened to include the Income deemed to accrue or arise in India
- Transfer Pricing Accountant report shall be submitted one month ahead of the due date for filing the Return of Income.
- Restriction of Interest deduction to 30% of EBITDA, in respect of Borrowings from Associated enterprises was earlier not applicable to Companies or PEs of Foreign Companies engaged in the Business of Banking. Such benefit has been now extended to entities, if the lender is an Indian PE of a foreign Company engaged in Banking business.
- DTAA's shall be entered into only to give relief in respect of genuine double taxation and shall be made without giving any opportunity resulting in treaty shopping, non taxation or reduced taxation leading to indirect benefits to residents of other countries.

## 2.8 TCS Provisions

- The applicability of TCS provisions for Individuals and HUFs from a deductor perspective, has earlier been linked to the turnover limits u/s 44AB and now it is linked to specified sum being INR 100 Lakhs and INR 50 Lakhs of Turnover in respect of Business and Profession respectively during the preceding previous year.
- Person who is selling overseas tour package shall collect tax at 5% additionally over and above the consideration and such TCS is not warranted if the payment is subject to TDS
- Any person who is selling goods other than those already covered under TCS provisions like Timber, Scrap, Motor vehicles for a consideration of over INR 10 Lakhs etc., shall collect 0.10% of the goods sold exceeding INR 50 Lakhs
- No TCS at 0.10% shall be collected, if the buyer is required to deduct Tax at source in respect of such Sale and actually deducted the Tax thereon.
- If the PAN / Aadhaar of the buyer is not available, the Rate of tax to be collected stands revised from 0.10% to 1%
- Provisions of TCS at 0.10% on Sales are not applicable to an assessee, if his Business turnover is less than INR 1000 Lakhs in the preceding financial year.

# Budget Analysis 2020

## 2.9 TDS Provisions

- The applicability of TDS provisions for Individuals and HUFs from a deductor perspective, has earlier been linked to the turnover limits u/s 44AB and now it is linked to specified sum being INR 100 Lakhs and INR 50 Lakhs of Turnover in respect of Business and Profession respectively during the preceding previous year.
- An eligible Start up shall deduct tax on ESOP perquisites to employees within 14 days from earliest of the following at the rates prevailing in the year of happening of the event:
  - After expiry of 48 months from the end of the AY in which ESOP was given
  - From the date of sale of securities by the assessee
  - From the date of ceasing to be an employee
- 10% TDS is proposed on all dividends payments subject to a threshold limit of INR 5,000 by Companies and mutual funds.
- Interest paid by Cooperative societies, (whose turnover from Business or profession exceeds INR 100 Lakhs or INR 50 Lakhs respectively in the preceding previous year) is subject to TDS at 10% with a threshold limit of INR 50,000 for senior citizens and INR 40,000 for others.
- 194C is amended to attract TDS on works including any work or manufacturing or supplying a product to the requirement or specification of a customer out of materials purchased from the relative of a customer as per section 40A(2)(b) (Earlier, material procured from customer was alone covered).
- A reduced TDS rate of 2% (from 10%) is prescribed in respect of Fees of Technical services u/s 194J
- TDS on Interest on Long term Bond or rupee denominated bond from abroad borrowed between 01 Apr 2020 to 30 Jun 2023 and listed in any International Financial Services centre is subject to TDS at 4%
- Reduced TDS rate of 5% on Interest on Borrowings from abroad is extended to loans borrowed upto 30 June 2023 extended from 30 June 2020.
- Reduced TDS rate of 5% on Interest paid to FII or QFI in respect of a Rupee denominated bond of Indian Company or a government security shall be extended till 30 Jun 2023 from 20 June 2020
- Similar reduced TDS rate of 5% is applicable on Interest paid to FII and QFI in respect of Municipal debt securities as well.
- Tax at 1% shall be deducted by the E-commerce operators (Flipkart, Amazon etc.,) u/s 194-O on Gross Turnover (including direct payments by customers) of a Ecommerce participant through the respective Ecommerce operator with a threshold limit of INR 5 Lakhs for Individuals and HUF with PAN / Aadhaar.
- If PAN / Aadhaar is not available, then the TDS rate on E-Commerce participants shall be revised upwards to 5%
- Any Authorised dealer in Foreign exchange while collecting money from a person for the purposes of remittance under Liberalised Remittance Scheme shall collect Tax at 5% subject to a threshold limit of INR 7 Lakhs per year and such TCS is not warranted if the payment is subject to TDS

# Budget Analysis 2020

## 2.10 Abolition of Dividend Distribution Tax

- Dividend Distribution Tax ('DDT') in respect of Dividends paid by Domestic companies and Mutual funds has been abolished effective from 01 Apr 2020 and reverted back to the classical system of taxation of Dividends in the hands of the recipients.
- Deduction in respect of Interest expenditure is allowed against Dividend receipts, however, such deduction is restricted to 20% of Dividend Income
- Deduction in respect of Inter Corporate dividends received by a domestic Company from another Domestic company is introduced to avoid cascading effect u/s 80M

## 2.11 Amendments Consequent to abolition of DDT

- Amendment of definition of Investment Income u/s 115C
- Foreign Companies subject to tax u/s 115A, 115AC and FII u/s 115AD of the IT Act shall pay tax on dividends received.
- Individual employees employed in specific knowledge based areas are required to pay tax u/s 115ACA in respect of dividends received by them.
- Income of Unit holders of Business Trust u/s 115UA shall pay tax on Dividends received and TDS is attracted at 10% upon payment.
- 10% TDS is proposed on all dividends payments subject to a threshold limit of INR 5,000
- Deduction in respect of Inter-corporate dividends as proposed by a new section 80M shall be available for domestic companies and Manufacturing companies opting to pay tax at reduced rate as per the Ordinance in September 2019.

## 2.12 Shifting Due dates for certain Reports / Certification

- Due dates for submission of the following Reports / Certificates shall be one month ahead of the due date for filing the Return of Income of the respective assessees.
  - Due date for furnishing Return of Income for Tax Audit Assesseees and Corporate Assesseees have been postponed from 30<sup>th</sup> September to 31 October
  - MAT / AMT Certification in Form 29B
  - Transfer Pricing Accountant's Report in Form 3CEB
  - Tax Audit Report in Form 3CA / 3CB
  - Certification of Capital Gains calculations in Slump Sale in Form 3CEA
  - Certifying the quantum of Exemption u/s 10AA – SEZ units in Form 56F
  - Accountant's Report for claiming benefit under Tonnage Taxation scheme in Form 66
  - Certificate of correctness of claim of deduction in respect of Income from Industrial undertaking u/s 80 IA in Form 10CCB
  - Certificate of correctness of claim of deduction in respect of Income from Multiplex Theatre, Convention Centre, Maintaining Hospital u/s 80 IB in Form 10CCBA, Form 10CCBB, Form 10CCBC, Form 10CCBD
  - Certificate of correctness of claim of deduction in respect of employment of new employees u/s 80 JJAA in Form 10DA
  - Audited accounts in respect of Income from Royalty and Fees for Technical services by Non residents in Form 3CE

# Budget Analysis 2020

- Audited accounts for claiming deduction u/s 33AB for Tea or coffee or rubber development account in Form 3AC
- Audited accounts for claiming deduction u/s 33ABA for Assessee engaged in prospecting, extraction or production of petroleum or natural gas in Form 3AD
- Audited accounts for claiming deduction u/s 35D / 35E for Assessee claiming deduction towards preliminary expenditure and Deduction for expenditure on prospecting for certain minerals in Form 3AE
- Due date for Return of Income for a Partner of a firm (earlier only working partner is covered) subject to Tax audit is 31 October

## 2.13 Assessment / Appeal Proceedings

- Scope of E-assessment scheme is extended to Best Judgement Assessment as well.
- Time limit for giving instructions in respect of E-Assessment scheme has been relaxed from 31 March 2020 to 31 March 2022.
- Dispute Resolution Panel can be resorted to by foreign non company assessee as well
- Appeal proceedings before the CIT(A) is proposed to be handled electronically
- No initial Stay order shall be passed by the ITAT without a condition that at least 20% of the tax, Interest, fees, Penalty or other sums payable is paid or security provided thereof
- Subsequent stay shall not be granted by the ITAT unless the condition of minimum payment is honoured by the assessee
- Conduct of any survey by income-tax authority below the rank of Joint Director or Joint Commissioner to be made with prior approval of the Joint Director or the Joint Commissioner to prevent abuse of powers. Sec 133A

## 2.14 Penal provisions

- Late fees of INR 200 per day of delay is leviable on Trusts, Institutions and funds which accept donations and do not file the return with the details of the donors.
- Any false entry in the Books of Accounts or omission of any entry required for computation of total income may attract a penalty equal to the aggregate amount of false entry and entries omitted
- Trust, Institution or fund failing to submit the returns may be subject to a penalty for INR 10,000 and can extend upto INR 1,00,000
- Penalty initiation and levy is also proposed to be made electronically

## 2.15 Others

- A Return of Income of a Company and Partnership firm shall be signed by any other person as prescribed for this purpose
- CBDT to adopt and declare a Taxpayer's Charter and issue orders, instructions, directions etc., to Income tax Authorities
- Person responsible for paying any sum to Non residents as per the Act to include Non resident himself, any person authorised by him and agents of such Non residents
- CBDT is empowered to make rules for tax compliance in respect of operations in India carried on by Non Residents and the transactions and activities of Non Residents. The former is applicable from 01 Apr 2020 and the latter is applicable from 01 Apr 2021.

# Budget Analysis 2020

## 3 Indirect taxes – GST

### 3.1 General

- Benefit of Composition levy extended to Inter-state Service providers
- Assesseees who opted for voluntary GST registration can also make an application for voluntary cancellation of GST Registration
- Time limit for restoration of cancelled registration shall be extended by 30 days by Addl Commissioner or Joint Commissioner and by another 30 days by Commissioner
- Late fees for non issuance of TDS certificate within the timeframe is abolished
- Applicability of Penal provisions have been extended to persons who causes to commit the offence and who retains the benefit from such offence
- Penalty provisions are also applicable to persons at whose instance the offences have been committed

### 3.2 Retrospective Amendments

- Time limit to claim the unavailed Transition credit and the manner of availing the same shall be prescribed to meet Judicial precedents.
- Supplies without consideration has been removed from being taxed under GST

### **Disclaimer**

Information in this publication intends to provide only an overall insight of the subjects covered herein. It shall neither be regarded as comprehensive nor sufficient for making any decisions, nor should it be used in place of a professional advice. KKGS and Co does not accept any responsibility for loss, if any arising from any action taken or not taken by anyone using this publication.

**THANK YOU**

