

BUDGET 2021, HIGHLIGHTS & ANALYSIS

"Faith is the bird that feels the light and sings when the dawn is still dark".

-Rabindranath Tagore

(Fireflies – A Collection of Aphorisms)

The world is facing a serious challenge of the pandemic and its aftershock. In these trying times, when many economies are struggling to revive, our people and our industry have exhibited remarkable resilience.

Post-pandemic, a new world order seems to be emerging, one in which Asia is poised to occupy a prominent position and India will have a leading role therein. In this scenario, our tax system has to be transparent, efficient, and should promote investments and employment in our country. At the same time it should put minimum burden on our tax payers.

The Finance Minister, Smt. Nirmala Sitharaman, has presented the Union Budget 2021 in the Parliament. It was the first-ever digital Union Budget as Govt. had decided not to print the budget documents. The Finance Bill 2021 which was tabled in the Parliament has proposed 80+ amendments to the Income-tax Act and other related Acts. The Govt. has decided not to change the tax rates for the next year. Increase in the tax audit turnover, Faceless Appeals, Dispute Resolution Committee, reduction in time-limit for re-opening of assessments, etc. are a few key proposals which have been introduced in the Finance Bill, 2021.

A QUICK GLANCE AT KEY TAKEAWAYS OF BUDGET 2020:

Income Tax:

- **No Changes in Tax Rates:** The government had already introduced a series of reforms in the Direct tax system for the benefit of our taxpayers and economy. Few months prior to the pandemic, in order to attract investments the government has slashed the corporate tax rate to make it among the lowest in



the world. The Dividend Distribution Tax too was abolished. The burden of taxation on small taxpayers was eased by increasing rebates.

- **Relief to senior citizen:** In the 75th Year of Independence of our country, Exemption from filing income tax returns for senior citizens who are 75 years and above and who only have pension and interest income. The paying bank will deduct the necessary tax on their income.
- **Reducing time limit for reopening of income tax assessment:** Presently, an assessment can be re-opened up to 6 years and in serious tax fraud cases for up to 10 years. As a result, taxpayers have to remain under uncertainty for a long time. Now it is proposed to reduce this time-limit for re-opening of assessment to 3 years from the present 6 years. In serious tax evasion cases too, only where there is evidence of concealment of income of Rs.50 lakh or more in a year, can the assessment be re-opened up to 10 years. Even this reopening can be done only after the approval of the Principal Chief Commissioner, the highest level of the Income Tax Department.

Further, it is proposed to completely remove discretion in re-opening and henceforth re-opening shall be made only in cases flagged by system on the basis of data analytics, objection of C&AG and in search/survey cases. Further, in order to bring certainty in income tax proceedings at the earliest, it is also proposed to reduce the time limits for general assessment or processing of income tax return by three months and also for filing of returns (belated and revised return).

- **Reduction of time limit for completing assessment:** The benefits of shorter time period for scrutiny proceedings are manifold. On the one hand, it reduces the compliance burden on the taxpayers who find it easier to explain matters pertaining to a recent previous year which also improve the ease of doing business. On the other hand, it enhances the ability of the Department to detect and bring to tax any leakages of revenue as the instances of tax evasion come to the notice of the Department within a shorter span of time. Hence, it has been

proposed that the time limit for completion of assessment proceedings may be reduced further by three months. Thus the time for completing of assessment is proposed to be nine months from the end of the assessment year in which the income was first assessable, for the assessment year 2021-22 and subsequent assessment years. This amendment will take effect from 1st April, 2021.

- **Constitution of a Dispute Resolution Committee for small tax payers:** In order to reduce litigation for small taxpayers, it is proposed to constitute a Dispute Resolution Committee for them, which will be faceless to ensure efficiency, transparency and accountability. Anyone with a taxable income up to Rs.50 lakh and disputed income up to Rs.10 lakh shall be eligible to approach the Committee. Consequently, the Settlement Commission shall be discontinued from 01.02.2021. However, the pending cases shall be decided by an Interim Board if opted by the applicant.
- **Income Tax Appellate Tribunal to be made faceless:** In order to provide transparent tax appellate mechanism, it is proposed to the make the Income Tax Appellate Tribunal faceless and jurisdiction-less. A National Faceless Income tax Appellate Tribunal Centre shall be established and all the communication between the Tribunal and the appellant shall be made electronically. Wherever personal hearing is needed, it shall be done through video-conferencing.
- **Relaxation to NRI for Income of Retirement:** When Non-Resident Indians return to India, they have issues with respect to their accrued incomes in their foreign retirement accounts. This is usually due to a mismatch in taxation periods. They also face difficulties in getting credit for Indian taxes in foreign jurisdictions. Therefore it is proposed to notify rules for aligning the taxation of income arising on foreign retirement benefit account.
- **Exemption from Tax Audit** – Currently, if your turnover exceeds Rs.1 crore, you have to get your accounts audited. In the February 2020 Budget, the said limit was increased to Rs.5 crore for those who carry out 95% of their transactions

digitally. To further incentivise digital transactions and reduce compliance burden, it is proposed to increase this limit for tax audit for such persons from Rs.5 crore to Rs.10 crore.

- **Relief for Dividend:** In the previous Budget, the government had abolished the Dividend Distribution Tax (DDT) in order to incentivise investment. Dividend was made taxable in the hands of shareholders. The dividend paid to Real Estate Infrastructure Trusts or Infrastructure Investment Trusts (REIT/InvIT) shall be exempt from TDS.

It is also proposed to clarify that deduction of tax on incomes including dividend income of Foreign Portfolio Investors may be made at treaty rate.

Further, as the amount of dividend income cannot be estimated correctly by the shareholders for paying advance tax, it is now proposed to provide that advance tax liability on dividend income shall arise only after the declaration/payment of dividend. Also, for Foreign Portfolio Investors, it is now proposed to enable deduction of tax on dividend income at lower treaty rate.

It is also proposed to exempt dividend payment from levy of Minimum Alternate Tax (MAT) for foreign company if the applicable tax rate is less than the rate of MAT.

- **Attracting foreign investment into infrastructure sector:** In the last budget, for attracting foreign investment in the infrastructure sector, government had granted 100% tax exemption, subject to certain conditions, to foreign Sovereign Wealth Funds and Pension Funds, on their income from investment in Indian infrastructure. It was noticed that few of such Funds are facing difficulties in meeting some of these conditions. In order to ensure that a large number of Funds invest in India, it is proposed to relax some of these conditions relating to prohibition on private funding, restriction on commercial activities, and direct investment in infrastructure. In order to allow funding of infrastructure by issue of Zero Coupon Bonds, it is proposed to make notified Infrastructure Debt Funds eligible to raise funds by issuing tax efficient Zero Coupon Bonds.

- **Tax Neutrality of conversion of Urban Cooperative Bank (UCB) into a Small Finance Bank (SFB):** In order to facilitate the transition of UCBs to SFBs, it is proposed to provide tax neutrality for the transition of UCBs to SFBs. Hence, the UCB shall not be required to pay capital gains for the assets transferred to the SFBs.
- **Affordable Housing/Rental Housing-** In order to incentivise purchase of affordable house, it is proposed to extend the eligibility period for claim of additional deduction for interest of Rs. 1.5 lakh paid for loan taken for purchase of an affordable house to 31st March 2022 under section 80-IBA. In order to increase the supply of affordable house, it is proposed to extend eligibility period for claiming tax holiday for affordable housing project by one more year to 31st March, 2022. In order to promote supply of Affordable Rental Housing for the migrant workers, it is also proposed to allow a new tax exemption for the notified Affordable Rental Housing Projects.
- **Relaxation of Condition for carry forward of loss for Disinvestment:** In order to promote strategic disinvestment of PSU, it is proposed to relax the condition regarding carry forward of loss for disinvested PSU in amalgamation.
- **Relaxation of Condition for tax neutral Demerger for disinvestment:** In order to promote strategic disinvestment, it is proposed to deem the transfer of assets by the PSU to the resulting company as tax neutral demerger.
- **Tax incentives to IFSC:** It is proposed to include, among others, tax holiday for capital gains for aircraft leasing companies, tax exemption for aircraft lease rentals paid to foreign lessors; tax incentive for relocating foreign funds in the IFSC; and to allow tax exemption to the investment division of foreign banks located in IFSC.

- **Pre-filing of return-** in order to ease compliance for tax payer, details of salary income, TDS, tax payment, etc – already come pre-fill for e-filing of income tax returns. To further ease filing of returns, details of capital gains from listed securities, dividend income, and interest from banks, post office, etc. will also be pre-filled.
- **Relief to Small Trusts:** So far there is a blanket exemption to small charitable trusts running educational institution and hospitals whose annual receipt does not exceed Rs.1 crore. Now the said limit is proposed to increase this amount to Rs.5 crore for non-applicability of various compliances like approval etc.
- **Carry Forward of loss by Charitable Organisations:** In order to provide certainty, it is proposed to clarify that charitable trusts shall not be permitted to claim carry forward of loss. However, the loan repayment and replenishment of corpus shall be allowed as application.
- **Timely deposit of Employees' contribution to labour welfare funds by Due Date:** Delay in deposit of the contribution of employees towards various welfare funds such as provident funds, superannuation funds, and other social security funds by employers result in permanent loss of interest/income for the employees. In order to ensure timely deposit of employees' contribution to these funds by the employers, it is proposed to reiterate that that the late deposit of employees' contribution by the employer **shall never be allowed** as deduction to the employer.
- **Non-filing of Return by Deductee/Collectee:** In order to discourage the practice of not filing returns by the persons in whose case substantial amount of tax has been deducted/collected, it is proposed to provide that a person in whose case TDS/TCS of Rs.50,000 or more has been made for the past two years and who has not filed return of income, the rate of TDS/TCS shall be at the double of the specified rate or 5%, whichever is higher. This provision shall not be applicable for the transactions where full amount of tax is required to be



deducted e.g. salary income, payment to non-resident, lottery, etc i.e. 192, 192A, 194B, 194BB, 194LBC or 194N of the Act.

If the provision of section 206CC of the Act is applicable to a specified person, in addition to the provision of this section, the tax shall be collected at higher of the two rates provided in this section and in section 206CC of the Act.

The specified person is a person who has not filed the returns of income for both of the two assessment years relevant to the two previous years which are immediately before the previous year in which tax is required to be deducted or collected, as the case may be. Further the time limit for filing tax return under sub-section (1) of section 139 of the Act has expired for both these assessment years. There is another condition that aggregate of tax deducted at source and tax collected at source in his case is rupees fifty thousand or more in each of these two previous years. Specified person shall not include a non-resident who does not have a permanent establishment in India Consequential amendment is proposed in sub-section (4) of section 194-IB of the Act

- **Levy of TDS on Purchase of Goods:** In order to widen the scope of TDS, it is proposed to levy a TDS of 0.1% on a purchase transaction exceeding Rs. 50 lakh in a year. In order to reduce the compliance burden, it is also proposed to provide that the responsibility of deduction shall lie only on the persons whose turnover exceeds Rs. 10 crore.

Central Government is proposed to be empowered by notification in the Official Gazette to exempt a person from obligation under this section on fulfilment of conditions as may be specified in that notification. Tax is required to be deducted by such person, if the purchase of goods by him from the seller is of the value or aggregate of such value exceeding fifty lakh rupees in the previous year. It is also proposed to provide that the provisions of this section shall not apply to,-

- a transaction on which tax is deductible under any provision of the Act;
- and

- a transaction, on which tax is collectible under the provisions of section 206C other than transaction to which sub-section (1H) of section 206C applies.

This means, if on a transaction a TDS or tax collection at source (TCS) is required to be carried out under any other provision, then it would not be subjected to TDS under this section. There is one exception to this general rule. If on a transaction TCS is required under sub-section (1H) of section 206C as well as TDS under this section, then on that transaction only TDS under this section shall be carried out. Board with the approval of the Central Government has been empowered to issue guidelines for removing difficulty in giving effect to the provisions of this section.

- **Relaxation in conditions for exemption to Sovereign Wealth Fund & Pension Fund (SWF/PF):** In order to incentivise more number of SWF/PF to invest in Indian Infrastructure, it is proposed to relax some of conditions for availing 100% tax exemption introduced in the last budget. The conditions which are proposed to be relaxed include prohibition on loans or borrowings, restriction on commercial activities, direct investment in entity owning infrastructure, etc.
- **Incentives for Start-ups:** In order to incentivise start-ups in the country, it is proposed to extend the eligibility for claiming tax holiday for start-ups by one more year i.e till 31st March, 2022. Further, in order to incentivise funding of the start-ups, it is proposed to extend the capital gains exemption for investment in start-ups by one more year i.e till 31st March, 2022.
- **Rationalisation of taxation of Unit Linked Insurance Plan (ULIP):** In order to rationalise taxation of ULIP, it is proposed to allow tax exemption for maturity proceed of the ULIP having annual premium up to Rs. 2.5 lakh. However, the amount received on death shall continue to remain exempt without any limit on the annual premium. The cap of Rs. 2.5 lakh on the annual premium of ULIP shall

be applicable only for the policies taken on or after 01.02.2021. Further, in order to provide parity, the non-exempt ULIP shall be provided same concessional capital gains taxation regime as available to the mutual fund.

- **Rationalisation of Tax free Income on Provident Funds:** In order to rationalise tax exemption for the income earned by high income employees, it is proposed to restrict tax exemption for the interest income earned on the employees' contribution to various provident funds to the annual contribution of Rs. 2.5 lakh. This restriction shall be applicable only for the contribution made on or after 01.04.2021.
- **Taxability of Surplus amount received by partners:** In order to provide certainty, it is proposed to rationalise the provisions relating to taxation of the assets or amount received by partners from the partnership firm in excess of their capital contribution.

It is proposed to substitute the existing sub-section (4) of section 45 of the Act with a new sub-section (4) and also insert a new sub-section (4A) to this section. New proposed sub-section (4) of section 45 of the Act applies in a case where a specified person who receives during the previous year any capital asset at the time of dissolution or reconstitution of the specified entity. The capital asset represents the balance in the capital account of such specified person in the books of the specified entity at the time of its dissolution or reconstitution. In this situation, the profit and gains arising from the receipt of such capital asset by the specified person shall be chargeable to income-tax as income of the specified entity under the head –capital gains and shall be deemed to be the income of such specified entity of the previous year in which the capital asset was received by the specified person. For the purposes of section 48 of the Act, the fair market value of the capital asset on the date of such receipt shall be deemed to be the full value of the consideration received or accruing as a result of the transfer of the capital asset. The balance in the capital account of the specified person in the books of account of the specified entity is to be calculated

without taking into account increase in the capital account of the specified person due to revaluation of any asset or due to self-generated goodwill or any other self-generated asset.

New proposed section sub-section (4A) of section 45 of the Act applies in a case where a specified person receives during the previous year any money or other asset at the time of dissolution or reconstitution of the specified entity. The money or other asset is required to be in excess of the balance in the capital account of such specified person in the books of accounts of the specified entity at the time of its dissolution or reconstitution. In this situation, the profits or gains arising from the receipt of such money or other asset by the specified person shall be chargeable to income-tax as income of the specified entity under the head "Capital gains" and shall be deemed to be the income of such specified entity of the previous year in which the money or other asset was received by the specified person. For the purposes of section 48 of the Act,

- Value of the money or the fair market value of other asset on the date of such receipt shall be deemed to be the full value of the consideration received or accruing as a result of the transfer of the capital asset; and
- The balance in the capital account of the specified person in the books of accounts of the specified entity at the time of its dissolution or reconstitution shall be deemed to be the cost of acquisition.

The balance in the capital account of the specified person in the books of account of the specified entity is to be calculated without taking into account increase in the capital account of the specified person due to revaluation of any asset or due to self-generated goodwill or any other self-generated asset.

For the purposes of these two sub-sections,-

- specified person is proposed to be defined as a person who is partner of a firm or member of other association of persons or body of individuals (not being a company or a cooperative society), in any previous year;
- specified entity is proposed to be defined as a firm or other association of persons or body of individuals (not being a company or a cooperative society);and

- self-generated goodwill and self-generated assets are proposed to be defined as goodwill or asset, as the case may be, which has been acquired without incurring any cost for purchase or which has been generated during the course of the business or profession.

Consequential amendment is also proposed in section 48 of the Act to provide that in case of specified entity, the amount included in the total income of such specified entity under sub-section (4A) of section 45 which is attributable to the capital asset being transferred, shall be reduced from the full value of the consideration to compute income charged under the head –capital gains||. This is to be calculated in the manner to be prescribed later. This is to mitigate the double taxation which may have happened but for this provision in a situation where an asset which was revalued and for which income under the proposed sub-section (4A) of section 45 of the Act was brought to tax is transferred subsequently by the specified entity.

These amendments will be effective from the 1st April, 2021 and will accordingly apply to the assessment year 2021-22 and subsequent assessment years.

- **Clarification on Depreciation on Goodwill:** In order to provide certainty, it is proposed to clarify that no depreciation on Goodwill shall be allowed. However, the deduction for the amount paid for acquiring Goodwill shall be allowed on sale of Goodwill.
- **Clarification for the Slump Sale:** In order to provide certainty, it is proposed to clarify that slump sale shall include all types of transfer.
- **Substitution of Authority for Advance Rulings with Board for Advance Rulings:** To ensure faster disposal of cases, it is proposed to replace the Authority for Advance Rulings with a Board for Advance Rulings. It is also proposed to provide appeal against the order of such Board to the High Court.

- **Alignment of Minimum Alternate Tax (MAT) for Advanced Pricing Agreement (APA) and secondary adjustment:** In order to provide relief to the taxpayers in whose case MAT liability has arisen in the year of repatriation on account APA or secondary adjustment, it is proposed to provide relief by aligning the MAT provisions with the year of taxability of such income.
- **Increase in safe harbour limit for primary sale of residential units:** In order to incentivise home buyers and real estate developers, it is proposed to increase safe harbour limit from 10% to 20% for the specified primary sale of residential units.
- **Fake Invoice/sham transaction:** In order to protect the revenue, it is proposed to provide that the penalty proceedings initiated for fake invoice/sham transactions of more than Rs. 2 crore shall also be eligible for provisional attachment of assets.
- **Exemption for Leave Travel Concession (LTC) cash scheme:** In order to provide relief to employees, it is proposed to provide tax exemption to the amount given to an employee in lieu of LTC subject to incurring of specified expenditure.
- **Clarification for Equalisation Levy:** In order to provide certainty, it is being expressly clarified that transaction taxable under income-tax are not liable for equalisation levy. Further, it is also proposed to clarify regarding applicability of equalisation levy on physical/offline supply of goods and services.
- **Miscellaneous :**
 - It is proposed to make consequential amendment in the provisions relating to processing of returns for allowing certain deductions and to provide clarification for adjustment of income reported in Audit Report.

- It is also proposed to enable issuance of notice for calling for returns by the prescribed authority.
- It is proposed to empower the Board to relax the rule relating to defective return for a class of taxpayers and to align due dates of return for certain taxpayers,
- It is proposed to clarify that Limited Liability Partnership shall not be eligible for presumptive tax for professionals.
- It is proposed to define the term “liable to tax” to provide certainty.

GST amendments

- As per Clause 99 of Finance Bill provides an new clause (aa) in sub-section (1) of Section 7 of the CGST Act shall be inserted, retrospectively with effect from the 1st July, 2017, so as to ensure levy of tax on activities or transactions involving supply of goods or services by any person, other than an individual, to its members or constituents or vice-versa, for cash, deferred payment or other valuable consideration.
- **Input Tax Credit:** As per clause 100 of Finance bill, In section 16 of the CGST Act in sub-section (2) inserted a new clause “(aa) the details of the invoice or debit note referred to in clause (a) has been furnished by the supplier in the statement of outward supplies and such details have been communicated to the recipient of such invoice or debit note in the manner specified under section 37”.
- Therefor input tax credit on invoice or debit note may be availed only when the details of such invoice or debit note have been furnished by the supplier in the statement of outward supplies and such details have been communicated to the recipient of such invoice or debit note
- **No GST Audit:** As per Sub-section (5) of Section 35 mandatory required to accounts audited under CGST Act. Now, as per clause 101 of Finance bill states Sub-section (5) of section 35 of the CGST Act is being omitted. So as to remove the mandatory requirement of getting annual accounts audited and reconciliation statement submitted by specified professional.

- **Exemption of filing Annual Return:** In Clause 102 of Finance bill Section 44 of the CGST Act is being substituted so as to remove the mandatory requirement of furnishing a reconciliation statement duly audited by specified professional and to provide for filing of the annual return on self-certification basis. Provided that the Commissioner to exempt a class of taxpayers from the requirement of filing the annual return.
- **Interest on net cash liability:** In clause 103 of finance bill amended under Section 50 of CGST Act, retrospectively, to substitute the proviso to sub-section (1) so as to charge interest on net cash liability with effect from the 1st July, 2017.
- Clause 104 of finance bill provides amendment in Section 74 of the CGST Act so as to make seizure and confiscation of goods and conveyances in transit a separate proceeding from recovery of tax.
- **Self-assessed Tax:** An explanation to sub-section (12) of section 75 of the CGST Act is being inserted under clause 105 of the finance bill to clarify that “self-assessed tax” shall include the tax payable in respect of outward supplies, the details of which have been furnished under section 37, but not included in the return furnished under section 39.
- Section 83 of the CGST Act is being amended so as to provide that provisional attachment shall remain valid for the entire period starting from the initiation of any proceeding under Chapter XII, Chapter XIV or Chapter XV till the expiry of a period of one year from the date of order made thereunder as stated in clause 106.
- **Penalty:** A proviso to sub-section (6) of section 107 of the CGST Act is being inserted under clause 107 to provide that no appeal shall be filed against an order made under sub-section (3) of section 129, unless a sum equal to twenty-five per cent of the penalty has been paid by the appellant.
- Section 129 of the CGST Act under Clause 108 of finance bill is being amended to delink the proceedings under that section relating to detention, seizure and release of goods and conveyances in transit, from the proceedings under section 130 relating to confiscation of goods or conveyances and levy of penalty.



- In Finance Bill, Clause 109 of amended Section 130 of the CGST Act to delink the proceedings under that section is relating to confiscation of goods or conveyances and levy of penalty from the proceedings under section 129 relating to detention, seizure and release of goods and conveyances in transit.
- **Power to Call Information:** Clause 110 of the Finance Bill mentioned in Section 151 of the CGST Act is being substituted to empower the jurisdictional commissioner to call for information from any person relating to any matter dealt with in connection with the Act.
- **No Information obtained:** Section 152 of the CGST Act under Clause 111 of Finance Bill is being amended so as to provide that no information obtained under sections 150 and 151 shall be used for the purposes of any proceedings under the Act without giving an opportunity of being heard to the person concerned.
- **Call for Information:** Clause 112 of finance bill amended Section 168 of the CGST Act to enable the jurisdictional commissioner to exercise powers under section 151 to call for information.
- Consequent to the amendment in section 7 of the CGST Act paragraph 7 of Schedule II to the CGST Act is being omitted retrospectively, with effect from the 1st July, 2017 under clause 113 of the Finance Bill.
- Further there is one more amendment even in the IGST tax under Section 16 which is being amended under Clause 114 so as to
 - zero rate the supply of goods or services to a Special Economic Zone developer or a Special Economic Zone unit only when the said supply is for authorised operations;
 - restrict the zero-rated supply on payment of integrated tax only to a notified class of taxpayers or notified supplies of goods or services; and
 - link the foreign exchange remittance in case of export of goods with refund.

Company Matters:

- **Decriminalising of LLP:** The decriminalizing of the procedural and technical compoundable offences under the Companies Act, 2013, is now complete. Therefore now it is proposed to next take up decriminalization of the Limited Liability Partnership (LLP) Act, 2008.
- **One Person Companies :**
 - No restriction on paid-up capital and turnover, to incentivise incorporation of one-person companies
 - Conversion of one-person company to any other kind, reducing residency limit from 182 days to 120 days
 - Allow non-resident Indians to incorporate one-person companies in India
- **Small Companies:** It is propose to revise the definition under the Companies Act, 2013 for Small Companies by increasing their thresholds for Paid up capital from “not exceeding Rs.50 Lakh” to “not exceeding Rs.2 Crore” and turnover from “not exceeding Rs.2 Crore” to “not exceeding Rs.20 Crore”. This will benefit more than two lakh companies in easing their compliance requirements.

Analysis of the change in above definition is as under:

Existing Provisions	Proposed Provisions
<ul style="list-style-type: none">➤ Paid-up share capital doesn't exceed fifty lakh rupees or such higher amount as may be prescribed which shall not be more than ten crore rupees and	<ul style="list-style-type: none">➤ Paid-up share capital doesn't exceed Rs. 2 Crores or such higher amount as may be prescribed which shall not be more than ten crore rupees and
<ul style="list-style-type: none">➤ turnover of which as per profit and loss account for the immediately preceding financial year does not exceed two crore rupees or such higher amount as may be prescribed which shall not be more than one hundred crore rupees	<ul style="list-style-type: none">➤ turnover of which as per profit and loss account for the immediately preceding financial year does not exceeding Rs. 20 Crores such higher amount as may be prescribed which shall not be more than one hundred crore rupees

The Hon'ble Finance Minister's aim is to further simplify the tax laws and procedures but the same will only be seen in the coming times. Considering that the tax laws need continuing reforms which is a massive challenge, it needs to be pursued with full vigour.

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