1.) Saurashtra Cement Ltd → Liquidated damage (delay in supply of
(S.C.) machine)

↓

Revenue/ Capital

↓

1.) Direct nexus with the procurement of asset.

2.) Compensation not received in profit-making process

3.) Compensation for sterlisation of profit making source

↓

Capital receipt.

2.) Softworks Computers Pvt. Ltd → Waiver of loan for relocation of
(Bombay HC) Office.

↓

1.) Capital exp nature → Object.
2.) Waiver of trading liab → Revenue
3.) Not liable to tax → Capital Exp.

3) Handicraft & Handloom Export Corp. Of → Grant given by H → S(100%) for
India Ltd recovering from losses (Capital/Revenue
(Delhi HC)

↓

(Sahni Steel & Press Works Ltd) → 1.) Purpose dekhna चाहिए grant का
(S.C)

2.) Source/Mechanism grant देने का
→ Irrelevant का

3.) Capital nature क्योंकि उसको cap. investment करना चाहता है।

4) Rassi Cements Ltd. (Madhya Pradesh HC) → Power sub. received by assessee from SG year after year → on the basis of ACTUAL power consumption (Capital / Revenue)

↓

1) Actual Power consumption → basis of computation of grant.

2) Purpose देखना है → Profit कमाना (after establishment)

3) Prodⁿ incentive

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5) Jagajit Industries Ltd. (Delhi HC) → Share capital foreign से issue → उस पैसा को सौंपकर day to day op. में use किया → Receipt from Forex Fluctuation Rate (Capital / Revenue)

(Against Sahni Steel & Press Work Ltd.)

↓

1) Due consideration → Source → Capital nature ↓ capital Receipt.

2) चाहे India या o/s India

3) Capital Receipt.

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6) Rasoi Ltd (Calcutta HC) → Sub. मिली scheme में Modernization और ~~[illegible]~~ को बढ़ाने के लिए (Capital / Revenue)

↓

1) Objective (Purpose) देखना जरूरी।

2) Mechanism देखना नहीं।

3) Capital Nature (irrelevant of basis of computation)

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7) Kisan Sahkari Chini Mill Ltd. (Allahabad HC) → Nature of incentive given for setting up & expansion of factory (Capital / Revenue)

↓

1) Objective → Repayment of loan & some of capital employed.

2) Scheme से पैसा मिला → loan