

AMENDMENTS BY FINANCE ACT, 2012

FOR CA IPCC/INTER
FOR MAY & NOVEMBER 2013

by
CA. Pankaj Saraogi
Visiting faculty – ICAI
FCA, B. Com. (H) – SRCC, B. Ed.,
Licentiate ICSI, M. Com., DISA (ICAI)

Contact:
96546 24201, ipcctax@saraogi.co.in

For latest amendments, expected questions &
revisionary notes
visit: www.saraogi.co.in



INCOME-TAX

Relevant Assessment Year – AY 2013-14

Relevant Previous Year – PY 2012-13

Rates of Taxation

Individual, HUF, AOP, BOI, Artificial Juridical Person

<u>Resident + age ≥ 60yrs.</u>	<u>Resident + age ≥ 80yrs.</u>	<u>Any other</u>	<u>Tax rate</u>
Upto Rs. 2.5L	Upto Rs. 5L	Upto Rs. 2L	Nil
Rs. 2.5L – 5L	---	Rs. 2L – 5L	10%
Rs. 5L – 10L	Rs. 5L – 10L	Rs. 5L – 10L	20%
> Rs. 10L	> Rs. 10L	> Rs. 10L	30%

W.e.f. AY 2013-14, both male & female have been treated at par.

*Tax rate for non-resident/foreign company in case of unlisted
securities – Section 112*

Assessee	– Non-resident or foreign company
Nature of CG	– LTCG
Capital Asset	– Unlisted securities
Tax rate	– Mandatorily 10% without indexation

Residential Status & Scope of Total Income

Offshore transactions

Section 9 (Income deemed to accrue or arise in India) – Following explanation has been added for transaction “income from the transfer of any capital asset situated in India”

A capital asset (being share in a company incorporated outside India) shall be deemed to be situated in India, if the share derives its value substantially from the assets located in India.

Section 2(14) (Definition of Capital asset) – Following explanation has been added

"Property" includes any rights in an Indian company, including rights of management or control.

Section 2(47) (Definition of Transfer) – Following explanation has been added

"Transfer" includes

- disposing of or parting with an asset or any interest therein,
- or creating any interest in any asset in any manner whatsoever,
- directly or indirectly, absolutely or conditionally, voluntarily or involuntarily,
- by way of an agreement (whether entered into in India or outside India) or otherwise,
- notwithstanding that such transfer of rights is dependent upon transfer of shares of a company incorporated outside India.

Section 195 (TDS deduction in case of payment to non-resident)

It has been clarified that u/s 195 TDS shall be deducted even if payment is being made by a non-resident, provided amount receivable by non-resident payee is taxable under Income-tax Act, 1961.

It shall not matter whether or not the non-resident person has -

- (i) a residence or place of business or business connection in India; or
- (ii) any other presence in any manner whatsoever in India.

Definition of Royalty clarified – Section 9

Following explanations added:

Transfer of rights in respect of any right, property or information includes transfer of right for use or right to use a computer software

(including granting of a licence) irrespective of the medium through which such right is transferred.

Royalty includes consideration in respect of any right, property or information, whether or not -

- (a) the possession or control of such right, property or information is with the payer;
- (b) such right, property or information is used directly by the payer;
- (c) the location of such right, property or information is in India.

The expression "process" includes transmission by satellite (including up-linking, amplification, conversion for down-linking of any signal), cable, optic fibre or by any other similar technology, whether or not such process is secret.

Profits & Gains of Business or Profession

Additional Depreciation – Section 32(1)(iia)

Benefit of additional depreciation extended to power sector undertakings w.e.f. AY 2013-14 provided they are following block of assets method and not SLM method. Earlier additional depreciation was restricted to assessee engaged in business of manufacturing only.

Deduction of expenditure on specified business – Section 35AD

	<i>Specified business</i>	<i>Eligible assessee</i>	<i>Starting</i>	<i>Deduction*</i>
1.	Cold chain facility	Any assessee	1/4/09	150%
2.	Warehousing facility for agricultural produce	Any assessee	1/4/09	150%
3.	Cross-country natural gas pipeline network	Indian company	1/4/07	100%

4.	Cross-country crude/ petroleum oil pipeline network	Indian company	1/4/09	100%
5.	Hotel	Any assessee	1/4/10	100%
6.	Hospital	Any assessee	1/4/10	150%
7.	Housing project for redevelopment or rehabilitation	Any assessee	1/4/10	100%
8.	Housing project for affordable housing	Any assessee	1/4/11	150%
9.	Production of fertilizer in India	Any assessee	1/4/11	150%
10.	Inland container depot or container freight station	Any assessee	1/4/12	100%
11.	Bee-keeping and production of honey and beeswax	Any assessee	1/4/12	100%
12.	Warehousing facility for sugar	Any assessee	1/4/12	100%

* Enhanced deduction of 150% shall be available only if business commenced on or after 01/04/2012. Even enhanced deduction of 150% shall be allowed for expenditure incurred prior to commencement of business.

Further, in case of business of hotel, if assessee transfers the operation (not ownership), he shall continue to claim deduction u/s 35AD.

Expenditure on agricultural extension project – Section 35CCC

Expenditure incurred on notified agricultural extension project shall be allowed as deduction @ 150% of expenditure incurred.

Expenditure on skill development project – Section 35CCD

Assessee - Company

Expenditure (except land or building) on notified skill development project shall be allowed as deduction @ 150% of expenditure incurred.

Tax Audit – Section 44AB

Limits increased to Rs. 1 crore for businesses and Rs. 25 lakhs for professions.

Presumptive basis of taxation – Section 44AD

Limit increased to Rs. 1 crore.

Further, section shall apply for all businesses or profession except:

- (i) specified profession as referred u/s 44AA
- (ii) a person earning income in the nature of commission or brokerage; or
- (iii) agency business.

Capital Gains **CII for FY 2012-13 = 852**

Fair market value deemed to be full value of consideration in certain cases – Section 50D

Where the full value of consideration is not ascertainable or cannot be determined, then fair market value of the said asset on the date of transfer shall be deemed to be the full value of the consideration.

Exemption on transfer of agricultural land – Section 54B

Benefit of said section extended to HUF also.

Capital gain on transfer of residential property not to be charged in certain cases – Section 54GB

<u>Assessee</u>	– Individual/HUF
<u>Capital gain</u>	– LTCG on residential property (house or plot of land)

Condition –

1. Invests net consideration in subscription of equity shares of eligible company on or before due date of ROI u/s 139(1)
2. Company in turn uses such net consideration for purchase of new asset within 1 year from the date of subscription.
3. If company is not able to invest net consideration for purchase of new asset before due date of ROI of assessee, then it may deposit under CGAS. If this amount not utilised within period of 1 year, amount exempted earlier shall become taxable in year in which 1 year expires.
4. If shares/new asset sold within next 5 years from the date of acquisition, then capital gains exempt shall become taxable in the year of default in the hands of assessee. Capital gains on transfer of shares/new asset shall be separately chargeable to tax in the hands of assessee/company.

Exemption – In proportion to net consideration invested.

Eligible company –

- (i) Company is incorporated between 1st April of the PY in which capital gain arises and due date of ROI of the assessee.
- (ii) It is engaged in the business of manufacture of an article or a thing;
- (iii) Assessee must have voting rights > 50% after subscription
- (iv) Company qualifies to be a small or medium enterprise under the Micro, Small and Medium Enterprises Act, 2006

"new asset" means new plant and machinery but does not include -

- (i) Second hand plant & machinery

- (ii) P&M installed in office premises or residential accommodation, including guest-house;
- (iii) any office appliances including computers or computer software;
- (iv) any vehicle; or
- (v) any machinery or plant, the whole of the actual cost of which is allowed as a deduction.

Income from Other Sources

Taxation of gift – Section 56(2)(vii)

Definition of relative has been extended to include member of HUF. Therefore, gift received by HUF from its member shall not be taxable.

Issue of shares at more than FMV – Section 56(2)(viib)

If shares are issued by a **closely held company** to a **resident assessee** and consideration received exceeds the **face value**, then difference between **issue price & FMV** shall be taxable in the hands of company u/h IOS.

FMV shall be calculated as per prescribed method or shall be FMV as proved by assessee based upon assets of the company, whichever is higher.

Deductions

Deduction u/s 80C

In case if life insurance premiums, limit of premium of 20% of capital sum assured has been reduced to 10% for **policies issued on or after 01/04/2012**. For earlier policies, limit of 20% shall be applicable.

Similarly, section 10(10D) regarding taxability of amount received on maturity of Life Insurance policies, for new policies limit of 10% shall be applied.

Deduction in respect of investment made under an equity savings scheme – Section 80CCG

<u>Assessee</u>	– resident individual
<u>Investment</u>	– in notified listed equity shares
<u>Deduction</u>	– 50% of investment, maximum deduction – Rs. 25,000.

Condition –

1. Deduction once in life time of the assessee
2. GTI ≤ Rs. 10,00,000
3. Assessee is a new retail investor (defined in scheme)
4. Shares not be sold in next 3 yrs. from the date of acquisition, otherwise deduction allowed shall be treated as income of PY in which shares are sold.

Investment in long-term infrastructure bonds – Section 80CCF

Not available w.e.f. AY 2013-14

Medical Insurance/Medical treatment of specified disease – Section 80D/80DDB

Age for senior citizen reduced to 60yrs.

U/s 80D deduction available for medical insurance premium or contribution to CGHS upto Rs. 15,000 (or Rs. 20,000) for self, spouse and dependent children and further Rs. 15,000 (or Rs. 20,000) for parents.

Now deduction shall also be available for preventive health check-up of self, spouse, dependent children and parents, but maximum of Rs. 5,000. Further, this deduction of Rs. 5,000 is not over & above deduction of Rs. 15,000 (or Rs. 20,000)

Lastly, deduction u/s 80D shall be allowed only if payment made by any mode other than cash in case payment is for medical insurance premium or contribution to CGHS. In case of preventive health check-up, payment may be by any mode including cash.

Deduction u/s 80G & 80GGA

Deduction for donation on any sum exceeding Rs. 10,000 shall be allowed only if made by any mode other than cash.

Deduction in respect of interest on deposits in savings account – Section 80TTA

<u>Assessee</u>	– Individual or HUF
<u>Income</u>	– Interest on saving account (not on FD) maintained with banks, co-operative society engaged in business of banking or post office. Deduction shall not be available to partner if interest received by firm.
<u>Deduction</u>	– maximum Rs. 10,000

TDS & Advance Tax

TDS on interest on securities – Section 193

No requirement to deduct TDS on interest in case of debentures issued by widely held company (**whether listed or not**) to resident

Individual/HUF if interest for the whole year upto Rs. 5,000 and payment made by account payee cheque.

TDS on payment to non-resident sportsmen – Section 194E

TDS rate increased to 20% (+2% +1%). Further, non-resident cum non-citizen entertainer performing in India is also covered under this section.

TDS on payment to non-employee director – Section 194J

If any payment is made to non-employee director, TDS shall be deducted @ 10%. Limit of exemption of Rs. 30,000 shall not apply in this case.

No TDS on following payment

Payment for acquisition of software from resident person. Conditions -

- (i) the software is acquired in a subsequent transfer and the payee has transferred the software without modification,
- (ii) tax has been deducted u/s 194J or u/s 195 on previous transfer of such software
- (iii) the payer obtains a declaration from the payee that the tax has been deducted.

Payment of compensation on acquisition of certain immovable property - Section 194LA

In case of compulsory acquisition of immovable property (except agricultural land whether urban or rural) TDS shall be deducted on compensation @ 10%.

No TDS shall be deducted if aggregate does not exceed Rs. 1,00,000 2,00,000.

Income by way of interest from Indian company – Section 194LC

<u>Payer</u>	– Indian Company
<u>Payee</u>	– Non-resident or foreign company
<u>Payment nature</u>	– interest on money borrowed between 01/07/2012 and 30/06/2015 in foreign currency under loan agreement or by issue of long-term infrastructure bonds
<u>TDS rate</u>	– 5% + cess.

Assessee in default in case of non-deduction of TDS – Section 201

In case deductor fails to deduct tax, he shall not be treated as assessee in default in case following conditions are satisfied:

1. Payee is resident
2. Payee has furnished ROI
3. Payee has considered such income in ROI and has paid tax
4. Deductor produces a certificate from CA in this regard.

If deductor satisfies the abovesaid conditions, it shall be deemed that deductor has deducted and deposited TDS on date of furnishing of ROI by the payee, resulting interest @ 1% shall be levied upto the date of furnishing of ROI by the payee.

Section 40(a)(ia) – If deductor satisfies the abovesaid conditions, expense shall be allowed to deductor in the year of furnishing of ROI by the payee. But same shall be disallowed in the year of accrual because TDS not deducted at that time.

Advance tax – Section 207

Advance tax shall not be payable by **individual resident in India + age 60 yrs. or more** if he does not have any income chargeable u/h PGBP. Resulting, such individuals shall not be liable for interest u/s 234B & 234C.

Calculation of advance tax – Section 209

While making calculations for advance tax liability and interest u/s 234B & 234C, actual amount of TDS deducted shall be considered and not the amount of TDS deductible.

Return of Income**Due date of filing ROI – Section 139(1)**

Due date of November 30 has been made applicable for all assesseees (earlier only for companies) required to submit report of CA u/s 92E.

Further, ROI filing on or before due date has been made compulsory for residents (except RNOR), if –

1. Such assessee has any asset (including any financial interest in any entity) located outside India or
2. Such assessee has signing authority in any account located outside India

It does not matter whether he has income chargeable to tax or not.

Miscellaneous**Unexplained cash credits – Section 68**

Where any sum is found credited in the books of an assessee, and the assessee offers no explanation about the nature and source thereof or the explanation offered by him is not satisfactory, then such sum may be charged to income-tax.

In case of ***closely held company***, explanation in regard to share application money (or share capital, share premium, etc.) shall be satisfactory only if ***share applicant*** offers satisfactory explanation about the nature & source.

Insertion of new Section 115BBE – Tax rates on incomes taxable by virtue of sections 68 to 69D

These incomes shall be taxable at flat rate of 30% and no allowance, deduction, expenditure, shall be allowed from these incomes. Even benefit of maximum amount which is not chargeable to tax shall not be available from such incomes.

Income of Prasar Bharati – Section 10(23BBH)

Any income of the Prasar Bharati (Broadcasting Corporation of India) established under sub-section (1) of section 3 of the Prasar Bharati (Broadcasting Corporation of India) Act, 1990 shall be exempt.

Sale of Crude Oil – Section 10(48)

Any income received in India in Indian currency by a foreign company on account of sale of crude oil to any person in India shall be exempt:

Provided that -

- (i) There is an agreement with the CG;
- (ii) Agreement & foreign company have been notified; and
- (iii) The foreign company is not engaged in any other activity in India.

UPCOMING BATCHES SCHEDULE FOR MAY 2013 & NOVEMBER 2013

by
CA. Pankaj Saraogi
Visiting faculty – ICAI
FCA, B. Com. (H) – SRCC, B. Ed.,
Licentiate ICSI, M. Com., DISA (ICAI)

CA IPCC/INTERMEDIATE TAXATION

Batch	Starting	Days	Timings	Venue
I	28/01/2013	MWF	5.45pm – 8.30pm	AOC Connaught Place & Satellite Centers
II	28/01/2013	MWF	11.00am – 1.45pm	AOC North Campus
III	19/06/2013	MWF Sun.	5.45pm – 8.30pm 12.00pm – 3.00pm	AOC Connaught Place & Satellite Centers
IV	19/06/2013	MWF	11.00am – 1.45pm	AOC North Campus
V	29/07/2013	MWF	5.45pm – 8.30pm	AOC Connaught Place & Satellite Centers
VI	31/07/2013	MWF	11.00am – 1.45pm	AOC North Campus

CA FINAL DIRECT TAX LAWS

Batch	Starting	Days	Timings	Venue
I	30/05/2013	TTS	5.45pm – 8.30pm	AOC Connaught Place
II	30/11/2013	TTS	5.45pm – 8.30pm	AOC Connaught Place

Contact:

96546 24201, ipcctax@saraogi.co.in

For latest amendments, expected questions & revisionary notes, visit: www.saraogi.co.in



SERVICE-TAX

Rate of Service Tax for FY 2012-13 – 12.36%

- Rate of service tax for FY 2012-13 is 12.36% (i.e. Service tax @ 12% + EC @ 2% + SHEC @ 1%)
- In case of life insurance policies, service tax shall be 3% of gross premium in first year of policy and 1.5% in subsequent years. (earlier it was 1.5% for all years)
- Purchase or sale of foreign currency

<u>Amount</u>	<u>Service Tax</u>
Minimum	Rs. 30
Upto Rs. 1,00,000	0.12%
Rs. 1,00,000 – Rs. 10,00,000	0.06%
> Rs. 10,00,000	0.012%
Maximum	Rs. 6,000

- In case of Distributor or Selling Agents of Lotteries

<u>Guaranteed lottery prize payout</u>	<u>Amount of service tax payable on every Rs. 10 Lakh</u>
	<u>Till 31.03.2012</u> <u>W.e.f. 01.04.2012</u>
More than 80%	Rs. 6,000 Rs. 7,000
Less than 80%	Rs. 9,000 Rs. 11,000

- In POTR, 2011 Rule 2A has been inserted to define date of payment.
Earlier of –
(a) date on which payment is entered in the books of accounts, or
(b) date on which payment is credited to the bank account
But, date of payment = date on which amount is credited in the books of accounts, if
(a) there is change in effective rate of tax (or service is taxed for the first time) between date of entry in books and credit in the bank account

- (b) credit in the bank account is after 4 working days from the date of change in effective rate of tax (or from the date on which service is taxed for the first time)
- (c) payment is made by cheque, etc. (which requires credited to be bank account)
- 6. In case of Rule 3 of POT Rules 2011, period of 14 days shall be taken as 30 days (45 days in case of banks & financial institutions)
- 7. As per Rule 5 of POT Rules 2011, no service tax is payable in case of new service if payment is received and invoice is issued before the service became taxable or payment is received before the service became taxable and invoice has been issued within 14 days of such payment but now 14 days shall be from the date when the service became taxable instead of the date of payment.
- 8. Rule 3 of POTR, 2011 – If service provider receives amount in excess of invoice amount by maximum Rs. 1,000, then service provider may opt to decide POT on the basis of invoice & completion only, ignoring date of payment. Further, in such a case, there is no need to issue invoice.
- 9. Rule 8A of POTR, 2011 – A residual rule has been inserted to determine the point of taxation by way of best judgment to handle situations where the tax-payer is unable to furnish one or more of the details needed i.e. date of payment or date of invoice or both to determine point of taxation.
- 10. Option of payment of service tax on receipt basis has been extended for all services, service providers being individual & partnership firms subject to condition that:
Aggregate value of services rendered in preceding financial year shall not exceed Rs. 50 lakhs and further this option shall be valid for first Rs. 50 lakhs of services rendered during the year. (Rule 6 of STR, 1994). Correspondingly Rule 7 of POTR, 2011 has been withdrawn.
- 11. As per Rule 2 of STR 1994, the term Partnership Firm shall include Limited Liability Partnership firm.

- 12. Maximum amount of self-adjustment was restricted to Rs. 2,00,000 except in case of delayed receipt of details. Now this limit has been withdrawn.
- 13. If a service provider has aggregate value of service rendered in the preceding year upto Rs. 10,00,000, exemption shall be allowed in the current year upto a value of Rs. 10,00,000 and such value shall be the value of the invoices issued. (earlier payment received)
- 14. "Continuous Supply of service" means any service which is provided, or agreed to be provided continuously or on recurrent basis, under a contract, for a period exceeding 3 months with the obligation for payment periodically or from time to time, OR where the CG notifies a particular service to be a Continuous Supply of service
- 15. In case of restaurant/catering services, value of taxable service shall be 40% (in case of restaurant) & 60% (in case of outdoor catering) of the total amount.
Total amount = 1. Gross amount charged + 2. FMV of goods supplied – 3. Amount charged for such goods – 4. VAT levied on such goods.
CENVAT credit of goods shall not be available.
- 16. "assessee" means a person liable to pay tax and includes his agent
- 17. "person" includes, -

(i) an individual	(ii) a HUF
(iii) a company	(iv) a society
(v) a LLP	(vi) a firm
(vii) an AOP or BOI	(viii) Government
(ix) a local authority	(x) any other person

SERVICE

Service – Section 65B(44)

"service" means any **activity** carried out **by a person for another** for **consideration**, and includes a declared service

Explanation 3:-

- an establishment of a person located in taxable territory and another establishment of such person located in non-taxable territory are treated as establishments of distinct persons.
- an unincorporated association or body of persons and members thereof are also treated as distinct persons.

Does not include

1. Transfer of title in goods or immovable property
2. Transaction in money except services by money exchanger
3. Service by employee to employer
4. Fees taken in Court/tribunal
5. Functions performed by the MP, Members of State Legislative, Members of Panchayats, Members of Municipalities and Members of other local authorities
6. Duties performed by Chairperson/Member/Director in a body established by CG/SG/local authority

Negative list of services – Section 66D

Not taxable

1. services **by** Government or a local authority

Taxable

- services by the Department of Posts by way of speed post, express parcel post, life insurance and agency services provided **to** a person **other than Government**;
- services in relation to an aircraft or a vessel;
- transport of goods or passengers; or

- support services provided **to business entities**;

Rationale behind taxing certain activities of the Government or local authorities

Only those activities of Government or local authorities are taxed where similar or substitutable services are provided by private entities. The rationale is as follows-

- to provide a level playing field to private entities in these areas as exemption to Government in such activities would lead to competitive inequities; and
- to avoid break in CENVAT chain as the support services provided by Government are normally in the nature of intermediary services.

2. services **by** the Reserve Bank of India
3. services by a foreign diplomatic mission located in India
4. services provided to a foreign diplomatic mission or consular post in India, or family members of diplomatic agents or career consular officers posted therein (Notification 27/2012 dated 20/06/2012)
5. services relating to agriculture or agricultural produce
6. trading of goods
7. any process amounting to manufacture or production of goods
8. selling of space or time slots for advertisements

Taxable

- selling of space or time slots for advertisements **broadcast by radio or television**
- 9. toll charges
- 10. betting, gambling or lottery
- 11. admission to entertainment events or access to amusement facilities
- 12. transmission or distribution of electricity
- 13.
 - pre-school education and education up to higher secondary school;
 - education as a part of a curriculum for obtaining a qualification recognised by any law;

- education as a part of an approved vocational education course;
- 14. services by way of renting of residential dwelling for use as residence
- 15. extending deposits, loans or advances in so far as the consideration is represented by way of interest or discount
- 16. inter se sale or purchase of foreign currency amongst banks and/or authorised dealers
- 17. transportation of **passengers** by stage carriage, railways, metro, monorail, tramway, inland waterways, public transport, metered cabs, radio taxis or auto rickshaws

Taxable

- Railways – first class, air-conditioned coach (passengers & goods exempt upto 30/09/2012)
 - 18. transportation of goods by road, inland waterways
- Taxable**
- Goods transportation agency, courier agency
 - 19. funeral, burial, crematorium or mortuary services including transportation of the deceased

"advertisement" means any form of presentation for promotion of, or bringing awareness about, any event, idea, immovable property, person, service, goods or actionable claim through newspaper, television, radio or any other means but does not include any presentation made in person.

"agriculture" means the cultivation of plants and rearing of all life-forms of animals, except the rearing of horses, for food, fibre, fuel, raw material or other similar products.

"agricultural produce" means any produce of agriculture on which either no further processing is done or such processing is done as is usually done by a cultivator or producer which does not alter its essential characteristics but makes it marketable for primary market.

"amusement facility" means a facility where fun or recreation is provided by means of rides, gaming devices or bowling alleys in amusement parks, amusement arcades, water parks, theme parks or such other places but does not include a place within such facility where other services are provided.

"entertainment event" means an event or a performance which is intended to provide recreation, pastime, fun or enjoyment, by way of exhibition of cinematographic film, circus, concerts, sporting event, pageants, award functions, dance, musical or theatrical performances including drama, ballets or any such event or programme.

"approved vocational education course" means, -

- (i) a course run by an industrial training institute or an industrial training centre affiliated to the National Council for Vocational Training offering courses in designated trades notified under the Apprentices Act, 1961; or
- (ii) a Modular Employable Skill Course, approved by the National Council of Vocational Training, run by a person registered with the Directorate General of Employment and Training, Union Ministry of Labour and Employment; or
- (iii) a course run by an institute affiliated to the National Skill Development Corporation set up by the Government of India.

"betting or gambling" means putting on stake something of value, particularly money, with consciousness of risk and hope of gain on the outcome of a game or a contest, whose result may be determined by chance or accident, or on the likelihood of anything occurring or not occurring.

"courier agency" means any person engaged in the door-to-door transportation of time-sensitive documents, goods or articles utilising the services of a person, either directly or indirectly, to carry or accompany such documents, goods or articles.

"interest" means interest payable in any manner in respect of any moneys borrowed or debt incurred (including a deposit, claim or other similar right or obligation) but does not include any service fee or other charge in respect of the moneys borrowed or debt incurred or in respect of any credit facility which has not been utilised.

"support services" means infrastructural, operational, administrative, logistic, marketing or any other support of any kind comprising functions that entities carry out in ordinary course of operations themselves but may obtain as services by outsourcing from others for any reason whatsoever and shall include advertisement and promotion, construction or works contract, renting of immovable property, security, testing and analysis.

"renting of immovable property" means any service provided or agreed to be provided by renting of immovable property or any other service in relation to such renting.

"business entity" means any person ordinarily carrying out any activity relating to industry, commerce or any other business or profession;

"bundled service" means a bundle of provision of various services wherein an element of provision of one service is combined with an element or elements of provision of any other service or services.

In case of bundled service, if services are **naturally bundled**, nature of whole service shall be determined acc. to the service which provides its main character.

If services are not naturally bundled, then such service shall be treated as provision of that service which results into highest tax liability. (Section 66F)

SCHEDULE OF AMENDMENT CLASSES FOR CA IPCC/INTER

VENUE

AOC Connaught Place

Arya Public School, Raja Bajar, Baba Kharak Singh
Marg, Connaught Place, New Delhi – 110 001

Ph.: 2336 2250, 93138 30650

Also at AOC Satellite Centers

DATE & TIME

February 19 to 21, 2013

3.00pm – 8.00pm

FEES/CHARGES - FREE

Join & feel the difference

For further details, soft copy of amendment notes &
other study material,

visit: **WWW.SARAOGI.CO.IN**