Pm Q.32
13.66

# MAT

ADD if Debited.

(a) Amt. of Income Tax paid & payable & Prov.

Income tax
· CDT
234 A|B|C
· Surcharege
· Education cess

~~S.T.T~~
~~Int. under other Act~~
~~Penalties~~
~~commodities transaction Tax~~

(b.) Transfer to Reserve

(c.) Provision

Unascertained Liab.

Adhoc basis

~~Scientific basis~~
~~Actuary basis~~
~~Prov. for SALES TAX~~

(d) loss of Subsidiary Co.

(i.) Diminution in Value of Asset
Prov. for Doubtful Debts
Prov. for Diminution in value of Asset as per AS-13/28.

(e) Dividend Paid / Proposed

(h) Deferred Tax & Provision thereof.

(f) Expenditure Of Income U/S
10 EXCEPT 10(38)
11 & 12

Theory 1. Unit IN IFSC MAT @ 9%. (FA 2016)

2. → India → ✓ DTAA/TIEA → Country → Foreign co. Resident
X P.E in India

→ India → DTAA X → Country → Resident F.C.
X Reg. Requirement

MAT नहीं लगेगी In co. पे

Minus if Credited.

(i) Transfer from Res. if Res. is created by Debiting P&L

(v.) Deferred Tax (corresponding effect)

(iid) Income U/S
10 EXCEPT 10(38) (corresponding effect)
11 & 12

**APPOLLO TYRES LTD V/S CIT** → Sec-115JB does not empower the A.O. to make fresh enquiry of the entries made in Book of A/c of Co.

→ A.O. has only power to examine whether books of A/c are certify by authorities under Co. Act. & thereafter increase and decrease as per explanation 1 to 115JB

| | |
|---|---|
| fa | EXPENDITURE of income from AOP BOI (U/S 86) |
| (fb) | FOREIGN Co. |
| | Expenditure of Income |
| | → C.G. arising on Transaction in Securities |
| | → Int., Royalty, technical fees (115A) Taxable @ < 18.5% |
| | → 10(38) |
| fd. | Expenditure of Income Royalty (Patent 115BBF) |
| g | ENTIRE DEP (INCL. on Revalued Asset) |
| (j) | Untransferred Revaluation Amt. on the Disposal of Revalued Asset. |
| (K) | S.P. of Units − Cost of S.P.V. |
| | (2400 − 1000) = 1400 |
| | CRUX: Like 10(38) = No Treatment |
| | same way 1400 Add करके 1400 minus कर दिए दूसरे में। |
| (fc) vice versa of (iie) | F.M.V. of Unit − Cost of S.P.V → Due to Cap loss 100 ; Due to F.M.V 90 |
| | (810 − 1000) |
| | S.P. of unit − F.M.V. of Unit |
| | (720 − 810) = 90 |

**NJ Jose & Co. Pvt. Ltd.** → LTCG exemp u/s 54EC are part of book profit u/s 115JB and are liable to MAT

→ MAT credit C/F for 10 A.Y. → Not available to LLP.

| | |
|---|---|
| (ii c) | Income from share of AOP BOI (Corresponding effect) |
| (ii d) | Foreign Co. |
| | Income |
| | → C.G. on Securities (corresponding effect.) |
| | → Int., Royalties, technical fees (115A) Taxable @ ≤ 18.5% |
| | → 10(38) |
| iig | Royalty (Patent 115BBF) (Corres effect.) |
| ii.a | Dep. excluding Revaluation |
| ii b | Amt. from Rev. Res. limited to Dep. on Revalued Asset |
| iie | F.M.V. of Unit − Cost of S.P.V → (A) Due to C.G. 200 ; (B) Due to FMV 120 |
| | (1320 − 1000) |
| | (C.) S.P. of Unit − F.M.V. of Unit. |
| | (2400 − 1320) = 1080 |
| vice versa of (fc) (iif) | (S.P. of Unit − Cost of S.P.V.) |
| | (720 − 1000) = 280 |
| (iii) | B/f loss or B/f Dep. (L) as per Books of A/c |
| (iv) | Sick Industrial Co. upto Net worth ≤ Acc. losses |

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