



ICAI SETU SERIES

BY:WOMEN MEMBER EMPOWERMENT COMMITTEE

OVERVIEW OF TDS TDS COMPLIANCES RECENT AMENDMENTS IN TDS AND TCS

Disclaimer

TDS is direct tax

Regular Amendments and updates received from CBDT

Views , explanations in ppt – (slides) is for general information, view of the speaker is purely for general discussion at the seminar and it should not be construed and binding either on the part of the speaker or institute.

It is not intended to be legal advice on any particular matter.

It is advised in your own interest to refer to Government publication including the Income Tax Act and Rules before arriving to any final conclusion.

Members requested to refer Act, Law , Rules and decision of various court of law from time to time depending on a particular case to case as may be applicable.



All you need to
know all about
TDS

Overview of
TDS



TDS and TCS that is Tax deduction at source and tax collection at source is the very important part of Income Tax. Whether you are in practice or not one should have knowledge of **applicability** of TDS and TCS.

The concept of TDS was introduced by Income Tax Department, with an aim to collect tax from the very source of income.

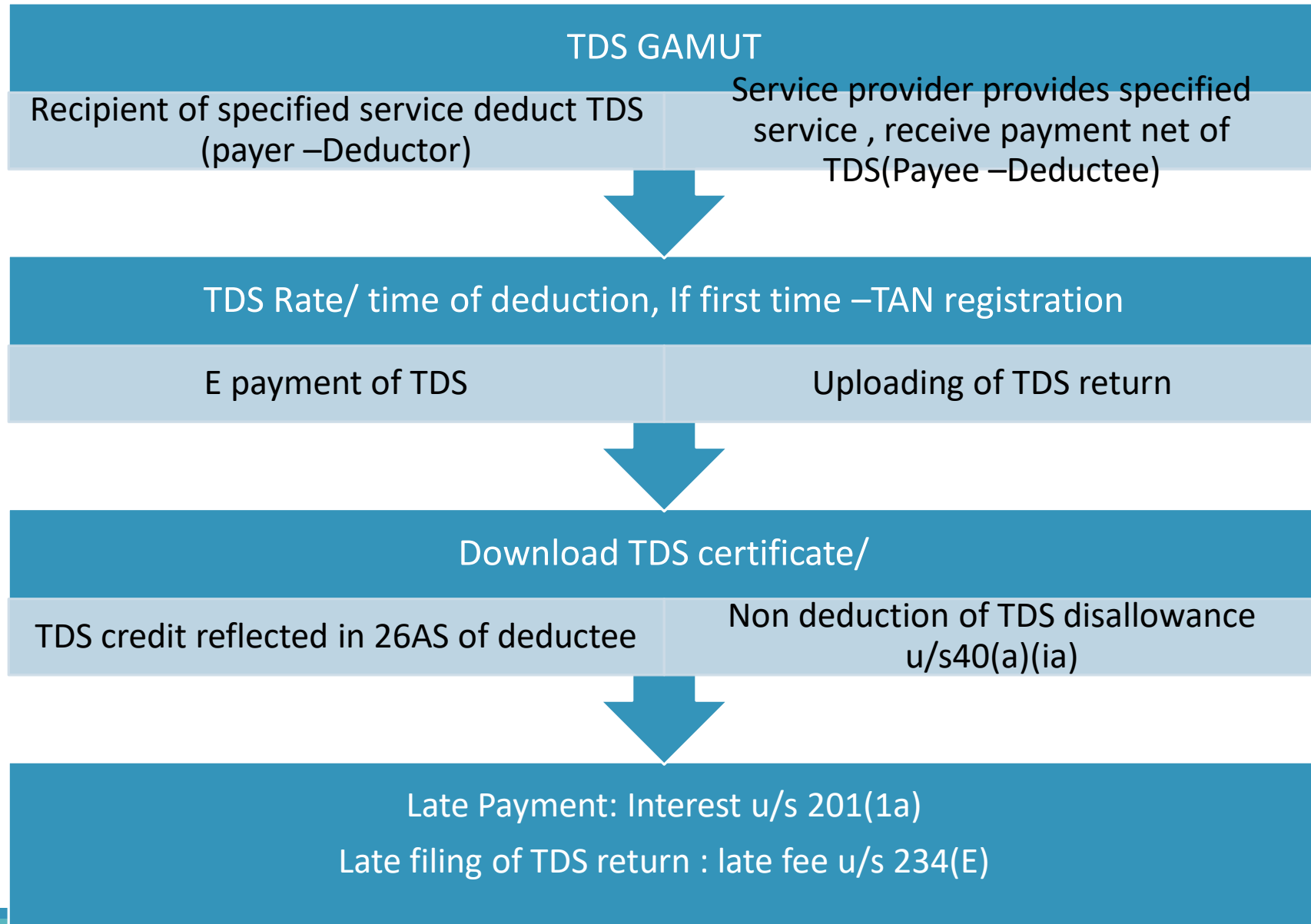
where a person (deductor) responsible for making specified payments such as

professional fees, commission, works contract, advertisement, interest, rent, salary, etc, is liable to deduct a certain percentage of tax before making payment.

The recipient (deductee) of such income receives the net amount (after reducing TDS).

The recipient will add the gross amount to his income and the amount of TDS is adjusted against his final income tax liability.

The recipient takes credit of the amount already deducted and paid on his behalf.



WHAT IS TDS



TDS introduced by ITD, where a person responsible for making specified payments such as salary, commission, professional fees, interest, rent etc is liable to deduct a certain percentage of tax as prescribed in the Act before making payment in full to the receiver of the payment.

Deductor



Person who is making the payment, payer is known as deductor.

Deductee



Person who receives the net payment, payee is known as deductee.

When TDS should be deducted



**Any person making specified payment mentioned under the income tax act at the time of making payment or credited to books of account, whichever is earlier.
(Explain)**

TDS to be
deducted by
whom



- Individual and HUF whose accounts are required to be audited
- As per amendment in Finance Act 2020, every person is required to **deduct TDS** if during **the** previous year **the turnover** or gross receipts is **more than** Rs. **1 crore** in case **of** assessee carrying business or Rs. 50 Lakhs in case **of** assessee carrying profession.
- In case of rent payments made by individuals and HUF exceeding Rs 50,000 per month, are required to deduct TDS @ 5% even if the individual or HUF is not liable for a tax audit.
- Employer deducts TDS at the applicable income tax slab rates.

Due date for
depositing TDS
to the
government



The Tax Deducted at Source must be deposited to the government by 7th of the subsequent month from the date of deduction.
For March month: 7th April (for government Deductors)
30th April (for other Deductors)

TDS rates (Check the updated rate when one want it for real case scenario)

Section	Particular	Rates	Threshold limit
192	TDS on salary	Does not specify TDS rates	Income tax slabs and rates applicable to relevant F.Y. for which salary is paid
194A	TDS on interest, Interest other than interest on securities – Banks Time deposits, Recurring deposit and Deposit in Co-op Bank	10%	<ul style="list-style-type: none"> • Senior Citizen Rs. 50000.00 • Others Rs. 40000.00
194C	TDS on payment to contractors	<ul style="list-style-type: none"> • Individual -1% • Company - 2% 	<ul style="list-style-type: none"> • Single payment Rs.30,000 • Aggregate payment Rs.1,00,000
194H	TDS on commission or brokerage	5%	Rs.15,000
PAN	Note: Deductee should provide PAN to the deductor No PAN case	20%	As per section 206AA

Section	Particular	Rates	Threshold limit	
194J	<ul style="list-style-type: none"> Fees for professional or technical services. If recipient is engaged in business of operation of call Centre If sum is payable towards fees for technical services (other than professional services) 	<ul style="list-style-type: none"> Individual - 2% Company - 2% 	The Threshold Limit of Rs.30,000 on Any sum paid	

Section	Particular	Rates	Threshold limit
194J	In all other cases	<ul style="list-style-type: none"> • Individual 10% - Company 10% 	The Threshold Limit of Rs.30,000 on Any sum paid
195	<ul style="list-style-type: none"> • Income from investments made by NRI 	20%	NA

Compliance and procedure

Registration

- Person liable to deduct TDS apply for TAN (Tax deduction account number)
- Application in Form 49B. One can apply for **TAN** online at the NSDL-TIN website
- TAN : MUMC14256F (Example)

Payment of TDS

- Tax Deducted at Source has to be deposited using Challan ITNS-281 on the government portal.

Detail of challan

- F.Y., Amount, TAN of the deductor ,
- Minor head : TDS /TCS payable tax payer (200) | (Explain)
- Nature of payment : section
- Major head: whether deductee is Non Company or Company

How to file TDS return

- The deductor/collector of TDS/TCS can file Return using Return Preparation Utility (RPU)
 - Download the Return Preparation Utility (RPU) from TIN NSDL website

TDS return can be filed in two ways

- Through TIN FC Centre
- Through Income Tax E filing portal

Steps to Prepare TDS File using Return Preparation Utility

Open the executable JAR file

Click on the “Ok” option to move forward

Select TDS Return Form Type based on Nature of Payment

Select the Type of Return i.e, Regular or Correction












Fill in the required details in the Form. ..

Fill in the Challan details

Fill Deductee details

Click on “Create file “ option

Once the file is created from RPU, one needs to add this file and Challan Inquiry File into FVU(File validation Utility) of TDS/TCS Return and create an FVU file. And this FVU file will be used to file TDS/TCS Return.

 TDS_FVU_L.bat	Windows Batch File	1 KB
 TDS_RPU.bat	Windows Batch File	1 KB
 TDS_FVU_L.bat	Windows Batch File	1 KB
 TDS_RPU.bat	Windows Batch File	1 KB
 TDS_RPU_3.0.jar	Executable Jar File	1,976 KB
 TDS_STANDALONE_FVU_2.161.jar	Executable Jar File	653 KB
 TDS_STANDALONE_FVU_6.5.jar	Executable Jar File	688 KB
 tin_common.jar	Executable Jar File	1,562 KB
 VersionValidator.jar	Executable Jar File	10 KB
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Various types of TDS return

Form No	Type of Transactions reported in the return	Due Date
Form 24Q	TDS on Salary	Q1 – 31st July Q2 – 31st October Q3 – 31st January Q4 – 31st May
Form 26Q	TDS other than salary	Q1 – 31st July Q2 – 31st October Q3 – 31st January Q4 – 31st May
Form 27Q	TDS on all payments made to non-residents except salaries	Q1 – 31st July Q2 – 31st October Q3 – 31st January Q4 – 31st May
Form 26QB	TDS on sale of property (finance bill 2013)	30 days from the end of the month in which TDS is deducted
Form 26QC	TDS on rent	30 days from the end of the month in which TDS is deducted

TDS certificate

Form	Certificate	Frequency	Due date
Form 16 (Explain part A and B)	TDS on salary payment	Yearly	31st May
Form 16 A	TDS on non-salary payments	Quarterly	15 days from due date of filing return
Form 16 B	TDS on sale of property	Every Transaction	15 days from due date of filing return
Form 16 C	TDS on rent	Every Transaction	15 days from due date of filing return

TDS credits in Form 26AS : How TDS is linked to PAN

- TDS deductions are linked to PAN numbers for both the deductor and deductee
- 26AS is a consolidated tax statement which is available to all PAN holders.
- Since all TDS is linked to your PAN, this form lists out the details of TDS deducted on your income by each deductor for all kinds of payments made to you – whether those are salaries or interest income .
- This form also has income tax directly paid by you – as advance tax or self assessment tax.
- it becomes important for assessee to mention PAN correctly, wherever TDS may be applicable on one's income.

Amendment in TDS – Finance Act 2021

TDS/TCS AMENDMENTS IN FINANCE ACT 2021

Amendments in Finance Act 2021

- Sec 194P – TDS in case of Specified Senior Citizens (**Applicable from 1st April, 2021-New section inserted**)
- Sec 206AB – TDS on Non Filers of Income Tax Return (**Applicable from 1st July, 2021-New section inserted**)
- Sec 206CCA – TCS on Non Filers of Income Tax Return (**Applicable from 1st July, 2021 –New section inserted**)
- Sec 194Q – TDS on Purchase of Goods (**Applicable from 1st July, 2021- New section inserted**)

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TDS/TCS AMENDMENTS IN FINANCE ACT 2021

*Amendment in Section 194 – Exemption from TDS on payment of Dividend to business trust-
(w.e.f. 01/04/2021)

*Amendment in Section 194A- No TDS on payment of interest by an infrastructure debt fund-
(w.e.f.01/04/2021)

*Amendment in Section 194-IB – Higher rate of TDS for non-filers of ITR-**(w.e.f. 01/07/2021)**

Section 194P in case of specified senior citizen: New inserted w.e.f.01/04/2021

Applicable to whom?	Specified senior citizen being resident in India: 1.Age of 75 years and more 2.Pension income and interest income from the same specified bank in which pension is received. 3.Declaration to the specified bank in the prescribed format.
Specified Bank	Notified Bank (it will notified by the government)
What will be TDS deduction rate	Income tax rate applicable in force after granting deduction under chapter VIA and rebate u/s 87A
Exemption (relief to senior citizen)	Specified senior citizen shall be exempted from filing of ITR for the year in which tax is deducted under said section 194P
Applicability	01/04/2021

Analyse the section

- Interest on saving account and fixed deposits should be eligible.
- Exempt income
- **Literal interpretation of section vs liberal interpretation**
 - ✓ Bank to test tax liability in old regime vs. new regime, should apply most beneficial regime.
 - ✓ If senior citizen is having account with more than one bank shall not be eligible from exemption to file ITR. Declaration to contain such clause.

Section 206AB Non filer of ITR

New section inserted w.e.f. 01/07/2021

Which Transaction will cover

Tax to be deducted in the respective sections under chapter XVIIB except:

1. Sec 192- TDS on salary
2. Sec 192A-TDS on accumulated balance in PF of an employee
3. Sec 194B-Winning from lottery or crossword puzzle
4. Sec 194BB-Winning from Horse Race
5. Sec 194LBC-Income from investment in securitization trust
6. Sec 194N-Payments of certain amount in cash

Who will cover under the TDS liability	<p>Specified person : Specified person means</p> <ol style="list-style-type: none"> 1. who has not filed Income Tax Return for immediately 2 previous year from the year in which tax is deducted 2. the due date for original return (u/s 139) has expired on the date of deduction 3. Aggregate of TDS and TCS > 50,000 in each of the 2 previous years .Does not Include NR who does not have PE in India
TDS rate	<p>Higher of following</p> <ol style="list-style-type: none"> 1.2 times X the rate of relevant section 2.2 times X the rate or rates in force 3.5%
Rate in case both Sec 206AA and Sec 206AB applicable	Higher of the rates provided in both the Section
Applicable w.e.f.	01/07/2021

Amendments in section 206 AA

1. Consequential amendment to Sec 194-IB

2. Inclusion to section 206AA

1. TDS shall not exceed rent payable of last month

2. For section 194Q higher rate of TDS will be 5%

As per section 206AA (amendment to section 206AA)

Sec 206CCA – TCS for Non filers of Income Tax Return New Section inserted w.e.f.01/07/2021.

Which Transaction will cover	Tax to be collected in the respective section under Chapter XVIIBB
Who will cover under the TCS liability	<p>Specified person : Specified person means</p> <ol style="list-style-type: none">1. who has not filed Income Tax Return for immediately 2 previous year from the year in which tax is collected2. the due date for original return (u/s 139) has expired on the date of deduction3. Aggregate of TDS and TCS > 50,000 in each of the 2 previous years Does not Include NR who does not have PE in India

Sec 206CCA – TCS for Non filers of Income Tax Return New Section inserted w.e.f.01/07/2021 (Contd)

TCS rate	Higher of following: 1. 2 times X the rate of relevant section 2. 5%
Rate in case both Sec 206CC and Sec 206CCA applicable	Higher of the rates provided in both the section
Applicable from w.e.f.	01/07/2021

Consequences /issues/considerations: Section 206AB and 206CCA

1. If assessee has filed belated returns then too section will be applicable.
2. The said provisions are not applicable : If assessee has filed ITR even in 1 of the 2 immediate preceding previous year.
3. Nothing has clarified in the said provisions : If assessee is not liable to file ITR.

Lets understand:

1. Specified senior citizen not required to file ITR as per Section 194P
2. Non residents or Foreign companies not required to file return of Income in India by virtue of exemption granted u/s. 115A(5)
3. Ecommerce operator deducting TDS of Farmers (Ecommerce participant) selling agriculture produce who is not required to file income tax return (agriculture income being only source of income)

Consequences /issues/considerations: Section 206AB and 206CCA

4. Resistance of other party to share ITR copy with the Deductor or the Collector

5. **"ITR Filing Compliance Check"** –In the absence of a proper portal/ mechanism to check deductee compliance, deductors may find it difficult to conform to the new legal provisions. Until the government finds a way out, deductors may ask for declarations/ ITR acknowledgement/ Form 26A to verify whether or not the deductee falls in the purview of the new law.6.

"Aggregate of TDS and TCS **in his case** exceed Rs. 50,000/-" words used **"in his case"** not giving clarity as to threshold limit to be checked for transaction with the deductor or with others also.

7. Data of aggregate TDS and TCS deducted / collected by other parties not available or not in control with the Deductor or the Collector and hence better view should be limits to be checked by the deductor

Section 194Q- Definition

ANY PERSON BEING A BUYER WHO IS RESPONSIBLE FOR PAYING ANY SUM TO ANY **RESIDENT** (HERE IN AFTER THIS SECTION REFERRED TO AS THE SELLER)

FOR PURCHASE OF ANY GOODS OF THE **VALUE** OR AGGREGATE OF SUCH VALUE EXCEEDING FIFTY LAKH RUPEES IN ANY PREVIOUS YEAR

SHALL AT THE TIME OF CREDIT OF SUCH AMOUNT TO THE ACCOUNT OF THE SELLER OR AT THE TIME OF PAYMENT THERE OF BY ANY **MODE**, WHICHEVER IS EARLIER

DEDUCT AN AMOUNT EQUAL TO 0.1 PERCENT (%) OF SUCH SUM EXCEEDING FIFTY LAKH RUPEES AS INCOME TAX.

DECODING SECTION 194Q

NATURE OF EXPENSES	PURCHASE OF GOODS
TO WHOM IT IS APPLICABLE	BUYER PURCHASING GOODS FROM THE SELLER (RESIDENT) BUYER MEANS A PERSON WHOSE SALES, TURNOVER OR GROSS RECEIPTS EXCEEDS 10 CRORES IN IMMEDIATELY PRECEDING FINANCIAL YEAR BUYER WILL NOT INCLUDE ANY PERSON SPECIFIED BY THE CENTRAL GOVERNMENT BUYER SHOULD NOT BE IN THE LIST OF THE PERSONS EXCLUDED FROM THE PROVISION OF DEDUCTION
WHAT IS THRESHOLD LIMIT	50 LAKH RUPEES (VALUE OR AGGREGATE OF VALUE)
WHAT IS RATE OF TDS	0.1% ON PURCHASES EXCEEDING RS. 50 LAKHS
WHEN TO DEDUCT (TIME)	AT THE TIME OF CREDIT OR PAYMENT WHICH EVER IS EARLIER
APPLICABLE FROM WHICH DATE	01/07/2021
WHEN THIS PROVISIONS NOT APPLICABLE	1.TAX IS DEDUCTIBLE UNDER ANY OTHER PROVISIONS.(EXAMPLE 194 C) 2. TCS IS COLLECTED U/S. 206C (OTHER THAN 206C (1H))

DECODING SECTION 194Q

Applicable on import of goods?	No, seller is a non resident
Applicable on export of goods?	Amendment to section 204 in fa 2020: Here buyer can be resident or non resident, Sec 204 – person responsible for paying to include non resident as well his authorised person as well as his agent.(e2)
If seller does not have pan-no pan case	Higher of rate as per section i.e. 0.1% or 5%(sec 206AA)
If seller has not filed ITR- non income tax filer	Higher of 2 X rate as per the relevant section or 5% (sec 206AB)
If both No pan case Non income tax filer	Then higher of 2 shall apply i.e. 5%
Can buyer apply for lower TDS certificate?	No. No corresponding amendment in sec 197, Similarly can not apply for lower TCS certificate for TCS u/s 206C(1h)

CO-RELATION BETWEEN SEC 194Q AND SEC 206C(1H)

Particulars	Sec 194Q - TDS on Purchase of Goods	Sec 206C(1H) – TCS on Sale of Goods
Who is liable	Buyer whose sales, turnover or gross receipts exceeds Rs. 10 crores in immediately preceding financial year	Seller whose sales, turnover or gross receipts exceeds Rs. 10 crores in immediately preceding financial year
Threshold limit	Goods purchased exceeds 50 lakhs rupees	Goods sold exceeds 50 lakhs rupees
Rate of TDS /TCS	0.1% on purchases exceeding 50 lakhs rupees	0.1% on sales exceeding 50 lakhs rupees
Non PAN Case	Higher of rate prescribed ie.0.1% or 5%	Higher of rate prescribed ie.0.1% or 5%
Non filer Case	Higher of rate prescribed ie.0.1% or 5%	Higher of rate prescribed ie.0.1% or 5%
Time of deductibility/collectability	At the time of credit or payment whichever is earlier	At the time of receipt of the payment

CO-RELATION BETWEEN SEC 194Q AND SEC 206C(1H)

Particulars	Sec 194Q - TDS on Purchase of Goods	Sec 206C(1H) – TCS on Sale of Goods
When both sections are applicable which, which section shall apply	Tax to be mandatorily deducted by the Purchaser, if threshold limits satisfied	Tax to be collected if the Purchaser is not liable to or if liable has not deducted the same
Applicable W.E.F	1 st July 2021	1 st October 2020

Case Study

SN	Turnover of buyer in immediate preceding F.Y.(in crores)	Turnover of seller in immediate preceding FY(in crores)	Purchase / Sale of goods	Liability
1	28	8	70	TDS(70-50)*.1%
2	7	23	68	TCS(68-50)*.1%
3	9	8	65	Not applicable
4	12	28	45	Not applicable
5 *	24	15	79	Buyer (79-50)*.1%

* : In case 5: If the buyer does not fulfill his liability to deduct TDS u/s. 194Q, then the Seller shall be bound to collect TCS u/s. 206C(1H)

SEC 194Q – Meaning of Goods

- Goods not defined neither u/s. 194 Q nor u/s. 206C(1H), neither under Sec 2 of the Income Tax Act, 1961

- **Sale of Goods Act, 1930**

'Goods' means every kind of **movable property** other than actionable claims and money; and includes stock and shares, growing crops, grass, and things attached to or forming part of the land which are agreed to be severed before sale or under the contract of sale"

- **Central Goods and Services Tax Act, 2017**

'Goods' means every kind of movable property other than money and securities but includes actionable claim, growing crops, grass and things attached to or forming part of the land which are agreed to be severed before supply or under a contract of supply"

- The Sale of Goods Act, 1930 is a specific statute which deals with the '**sale of goods**' whereas the CGST Act, 2017 deals with tax on 'supply of goods'. Thus, the definition of term 'goods' can be referred to from the Sale of Goods Act, 1930 for the purpose of Section 194Q.
- Therefore, the tax is to be deducted under this provision from the purchase value of Movable property, Any commodity, Shares or Securities, Electricity, Agriculture produce, Fuel, Motor vehicle, Liquor, Jewelry or bullion, Art or Drawings, Sculptures, Scraps, Forest produce, etc.

Sec 194Q and Sec 206C(1H) - FAQ

- 1. Services** - Act has specifically stated goods and services separately in various sections, hence services not to be included in goods.
- 2. Shares and Securities** - is a good as per definition of Sale of Goods Act, 1930, however exemption of applicability of Sec 206C(1H) under CBDT Circular no. 17/2020 on shares transactions on recognized stock exchanges as trade executed on exchange platform and no contract between buyer and seller. **Similar exemption should be granted u/s. 194Q.** However both section shall be applicable on transfer of unlisted shares.
- 3. Immovable Property** – Goods are movable property, hence not applicable. Further covered under specific section – 194IA
- 4. Electricity** – Held as good by Apex court decision in case of National Thermal Power Corporation (5 SCC 203), however CBDT vide CBDT Circular no. 17/2020 exempted transaction in electricity, renewable energy certificates and energy-saving certificates traded through power exchanges from applicability Section 206C(1H). **Similar exemption should be granted u/s. 194Q**

Sec 194Q and Sec 206C(1H) – FAQ (Contd)

5. Software - The Supreme Court in its landmark decision of Tata Consultancy Services v. State of A.P [2004] 141 Taxman 132 (SC) held that Canned software (off the shelf computer software) are 'goods'.

Therefore, purchase of Canned software (off the shelf computer software) is purchase of 'goods' and will be liable to TDS under section 194Q even if buyer-entity capitalizes the same in its books. (3)

Purchase of customized or tailor-made software may be "services" and liable to TDS under section 194J or section 194-O.

6. Whether TDS under Section 194Q be deducted on inclusive of GST?:

GST levied as part of invoice for services shall not be considered for TDS in view of the clarifications from CBDT vide circular no. 23/17 dated 19/07/2017.

(explanation – Value)

Sec 194Q and Sec 206C(1H) – FAQ (Contd)

6. However, in respect of Section 206C(1H), the CBDT vide Circular No. 17, dated 29-09-2020, has clarified that since the collection is made with reference to receipt of the amount of sale consideration, no adjustment on account of indirect taxes including GST is required to be made for the collection of tax under this provision. Since deduction under Section 194Q is to be made with reference to the purchase value, applying the same principle it can be concluded that GST shall form part of the purchase value, therefore, the TDS is deductible on the purchase value inclusive of GST.

7. Whether the threshold for TDS be reckoned for each seller and for the FY 2021-22, should it be from 01-Apr-2021 or 01-Jul-2021?

Yes, the threshold of INR 50 Lakhs is Seller wise.

Regarding the Cut off date for the purpose of reckoning the threshold of INR 50 lakh, As a prudent measure, it is advisable that the purchase/s made prior to 01st July 2021 during FY 2021-22 shall be included.

SEC 194Q/ SEC 206C (1H) – Various Issues in implementation of section

- **Claim of TDS credit**

Sec 194Q – TDS to be claimed in the year in which Income is offered **(Rule 37BA)**.

- **Claim of TCS credit**

Sec 206C(1H) – TCS can be claimed in the year in which the same is collected **(Rule 37-I)** no requirement of matching expense and corresponding TCS.

- .

SEC 194Q/ SEC 206C (1H) – Other issues / Considerations

- **TDS applicable on branch Transfers**

Pre requisite of a buyer and a seller and hence TDS not applicable on branch transfers

- **Seller having multiple units, then purchases to be aggregated for TDS applicability**

Purchases shall be aggregated to compute threshold limit, if the multiple units fall under the same PAN of the seller.

SEC 194Q/ SEC 206C (1H) – Other issues / Considerations

- Whether **barter** transactions covered under the scope of TDS u/s. 194Q and TCS u/s. 206C(1H)?
- Sales, turnover, or gross receipts – whether GST shall be considered while determining the threshold limit?
- Purchase of Goods / Sale of Goods - whether GST shall be considered while determining the threshold limit?
- Ad hoc on account payments received by the Seller – TCS u/s. 206C(1H) – Grossing up to be done for GST & TDS both

Non deduction and Non payments

- Sec 40(a)(ia) - Disallowance of 30% of the expenditure for non deduction or non payment / 194Q
- Sec 201 – TDS, 206C - TCS
 - a. Assessee in default
 - b. Recovery of Tax
 - c. Interest u/s. 201 for TDS and Interest u/s. 206C(7)
- Penalty
 - a. Sec 271C - Penalty for failure to deduct TDS
 - b. Sec 271CA – Penalty for failure to collect TCS
- Prosecution

Sec 276B / 276BB Prosecution for failure to pay the tax collected from vendors / customers

Implementation

- **Management / Accounts Team have to keep themselves update**
 - a. Software updation – Automation, technology.
 - b. Continuous Knowledge upgradation of the Accounts Team handling TDS
 - c. Regular Communication with the accounts team of the Buyer / Seller
 - d. Ledger Reconciliations at regular intervals,
 - e. Regular account confirmation to get from buyer or seller
 - f. Regular Reconciliation of TDS / TCS credit to be claimed in a FY
 - g. Declarations from Buyer to be procured by the Seller for TCS collection u/s. 206C(1H)
- **CA's office**
 - a. Thorough Knowledge of the provisions of TDS and TCS before going on Audit
 - b. Continuous knowledge upgradation for staff
 - c. Audit workings – Reconciliations –reporting under Clause 34 of Tax Audit Report
 - d. Judgements / case of opinions / Circulars to be documented

Thank you

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