

IMPORTANT PROVISIONS OF INCOME TAX ACT, GST ACT & OTHER RULES AFFECTING RELIGIOUS/ CHARITABLE INSTITUTIONS

1. PREPARATION OF ACCOUNTS:-

i) Following are the Main documents to be kept ready for Statutory Auditing, Internal Auditing etc.

- Daybook or Cash Book
- Ledgers
- Trail Balance or Annual Statement.
- Bills & vouchers
- Receipt Books
- Bank Statement/Updated Passbook of all the bank accounts linked with the PAN for the financial Year
- Updated Receipt of Fixed Deposit maintained with banks

Note: If Sub accounts like construction accounts, Parish hall account, Pious associations etc are maintained, it has to be consolidated with main account. Hence details of such accounts also to be produced for verification.

- ii) At present most of the Income tax assessments are carried out electronically. Hence computerised books of accounts are more preferable. Also corrections can be done easily if any.
- iii) Please ensure that inter-group balance are tallied.
- iv) In case of Corpus donation please obtain letter from the Donor evidencing name and address of the donor along with the purpose of the donation
- v) Ensure that All the expense & Receipts are supported by proper documents.
- vi) Prepare bank reconciliation statements if bank balance as per bank statement and books are different
- vii) Verify and tally TDS and other financial information shown in 26AS statement with our Accounts.

2. PAN CARD& RELATED ACCOUNTS :-

PAN is an important tool that helps the Income Tax Department to monitor all the financial transactions of the institutions and trace any income leaks from the ITR filed by them. Currently quoting of PAN number is mandatory for many transactions like opening of bank account, Deposit with bank of more than Rs. 50,000, Sale or purchase of any immovable property for an amount exceeding Rs 10 lakh etc.

Income tax assessments are done on PAN basis. Hence in order to avoid demands from income tax department, all accounts related to a institution especially sub accounts like Construction account, Parish hall, Pious associations etc need to be consolidated while filing income tax return. (In other words, all sub-accounts, namely all accounts for which the PAN CARD of the Church/Institution/ Congregation/Diocese/Trust is given, are to be reflected in the main account and its IT Returns).

3. REGISTRTRATION OF CHURCHES, CONVENTS AS TRUSTS, SOCIETIES :-

Religious/charitable institutions in India are formed and working as per the provisions of Code of Canons of the Catholic Church. These religious institutions are not registered as a Trust or Society as per the Trusts Act or Societies Act since such Registration is not compulsory for Religious Institutions in Kerala. As per current practise, decree as per Canon Law from the Concerned Bishop is produced as a proof of establishment while registering with Income tax department for exemptions.

As per the Order of the Income Tax Tribunal (Cochin) in the case of Merciful Jesus Church vs. CIT (Exemption), Kochi dated 27-07-2016, a Decree as per Canon Law from the Concerned Bishop is sufficient to establish the nature of constitution. Hence Registration of church, Convents as trust, Society is not required in Kerala.

4. TDS (TAX Deducted at source) :-

i) When a person making the specified payment, which are mentioned under Income Tax Act, 1961, to another person then that Person (who is making the payment) has to deduct the TDS at specified rate when the amount of the payment exceeds the threshold limit. Non-deduction of tax at source would now attract disallowance in the hands of the charitable trust also. Thus, now trusts will be mandatorily required to deduct TDS while making certain expense to claim expense as the application of Income. Else the same will be taxable in the hands of Trusts. Following are the some of the payments on which Charitable Trust is required to deduct TDS.

Section	Nature of payment	Threshold Limit	Applicable from 01/04/2020 to 13/05/2020	Applicable from 14/05/2020 to 31/03/2021
		Rs.	TDS Rate (%)	TDS Rate (%)

192	Salaries	Rs. 2,50,000/-	Normal slab rate	Normal slab rate
194A	Interest (Any other person)	5000	10	7.5
194C	Payment to contractor/sub-contractor-Single Payment	30000		
	-Individual/HUF		1	0.75
	-Others (Company etc)		2	1.5
194C	Contractor – Consolidated Payment During the F.Y.	100000		
	- Individual/HUF		1	0.75
	- Others (company etc)		2	1.5
194H	Commission/Brokerage	15000	5	3.75
194I	Rent of -	240000		
	-Plant/Machinery /Equipment		2	1.5
	- Land and Building/Furniture & Fixture			10
194IA	Transfer of certain immovable property other than agriculture land	50 lakh	1	0.75
194J	Professional Fees	30000	10	7.5
194J	Technical Fees (w.e.f. 01.04.2020)	30000	2	1.5

ii) Due date for TDS Payment

A person who deducts the TDS is called Deductor. Such deducted amount is required to be deposited by the deductor to Government as Income Tax on behalf of deductee on monthly basis as below

- a) For the month of March – On or before 30th day of April
- b) In case of any other month – On or before 7 days from the end of the month in which the deduction is made

iii) Interest for Non deduction/Non Payment of TDS

Non deduction of TDS-1% per month from the date on which tax deductible to the date on which tax is actually deducted

Non payment of tax after deduction of tax - 1.5% per month from the date of deduction to the date of payment

iv) TDS Return

Filing Tax Deducted at Source returns is mandatory for all the persons who have deducted TDS. TDS return is to be submitted quarterly as below

Quarter	Period	Normal due date	Extended Due date for FY 2020-21 on account of Covid 19
1st Quarter	1st April to 30th June	31st July	31-03-2021
2nd Quarter	1st July to 30th September	31st October	31-03-2021
3rd Quarter	1st October to 31st December	31st January	31-03-2021
4th Quarter	1st January to 31st March	31st May	31-05-2021

As per section 234E, where a person fails to file the TDS/TCS return on or before the due date prescribed in this regard, then they shall be liable to pay, by way of fee, a sum of Rs. 200 for every day during which the failure continues. The amount of late fees shall not exceed the amount of TDS.

5. GST (GOODS AND SERVICES TAX) :-

All the activities of Charitable & Religious Trusts are not exempted from taxability under GST. Activities which fall within the meaning of Supply are taxable under GST unless these are specifically exempted under any Notification by the Government. A Charitable or Religious institution is liable for registration and pay tax on its taxable supply, if its aggregate turnover in a financial year exceeds Rs. 20 lakhs. Aggregate turnover includes both taxable & exempt supplies. But donations will not be considered in the calculation of Turnover. Hence in order to determine whether GST registration required or not understanding on taxable & exempted supply is very important.

Various activities performed by Charitable/Religious Institutions analysed from GST view which has discussed below

i) Conduct of any religious ceremony;

The amount charged, by whatever name called, for conduct of any religious ceremony is exempt from GST. Service other than by way conducting religious ceremony like advertisement on the premises of religious place or in the publications, Parking fee etc shall be leviable to GST.

ii) Renting of Parish Hall, Shopping Complex etc

If marriage halls, convention hall, shops situated within the premises of a religious place are rented out, income from letting out of such property is wholly exempt from GST if

- Room rents for accommodation is less than 1000/- Rs. per day.

- Parish hall rent is less than Rs.10,000/- per day
- Rent of shops is less than Rs.10,000/-per month,

But if such properties are not situated within walls or boundary walls of the religious place, income from such letting out will lose this exemption and income from it will be liable to GST.

iii) Interest on fixed deposit

As per Notification No. 12/2017 - Central Tax (Rate) dated 28th June, 2017 services provided by way of extending deposits to banks and receives consideration in the form of interest is exempt. However, they are not liable to pay GST on interest received on fixed deposit. But it shall be included while computing the aggregate turnover of Rs. 20 lakhs, for registration under GST.

iv) Sale of Scrap

Goods Supplied by Charitable Trusts are taxable under GST unless the goods are specifically exempt under any notification by the government. Sale of scrap is a taxable supply under GST. Consequently, they shall consider sale of scrap as their taxable supplies and shall include it while computing the aggregate turnover of Rs. 20 lakhs, for registration under GST.

v) Healthcare Service

"Health care services" means any service by way of diagnosis or treatment or care for illness, injury, deformity, abnormality or pregnancy in any recognised system of medicines in India. Charitable trusts run a hospital and appoint specialist doctors, nurses and provide medical services to patients, such services are not liable to GST. But Sale of Medicines is to out Patients is Taxable.

vi) Educational service

The services provided by an educational institution to its students, faculty and staff are exempt from GST. In addition to that, income from education is wholly exempt from GST if a charitable trust is running a school, college or education institution for abandoned, orphans, homeless children, physically or mentally abused persons, prisoners or persons over age of 65 years or above residing in a rural area. But sale of Uniform, stationery, and other non-academic related supplies are taxable under GST.

6. CASH DEALINGS :-

In order to restrict cash transactions, the government has come out with several provisions and related rules to prohibit various types of cash payments. Such provisions under income tax act are given below

- As per section 40A(3), where the assessee incurs any expenditure in respect of which a payment or aggregate of payments made to a person in a day, otherwise

than account payee cheque or account payee bank draft or use of electronic clearing system through a bank account, exceeds Rs 10000, no deduction shall be allowed in respect of such expenditure. Hence in the case of charitable/Religious institution, if payment exceeding Rs. 10,000 is made in cash or by bearer cheque, such payment will be disallowed from the assessment year 2019-20 while calculating application of income.

- As per section 269SS a person cannot accept loan or deposit or an advance or otherwise, in relation to the transfer of any immovable property amounting to Rs.20000 or more from another person otherwise than by an account payee cheque or account payee bank draft or use of electronic clearing system through a bank account. 100% of the loan or deposit amount will be the quantum of penalty that can be levied by the assessing officer on contravention of this provision
- Section 269T prohibits any person to repay the loan or deposit or specified sum of Rs.20000 or more ,otherwise than by an account payee cheque or account payee bank draft or by use of electronic clearing system through a bank account. 100% of the loan or deposit amount will be the quantum of penalty that can be levied by the assessing officer on contravention of this provision
- As per Section 269ST no person shall receive an amount of two lakh rupees or more—
 - a) in aggregate from a person in a day or
 - b) in respect of a single transaction or
 - c) in respect of transactions relating to one event or occasion from a person,otherwise than by an account payee cheque or an account payee bank draft or use of electronic clearing system through a bank account. If any person not comply with section 269ST then they shall be liable to pay an amount as penalty equal to such amount of the transaction.

7. INVESTMENTS ELIGIBLE U/S 11(5) :-

Surplus fund of the Religious and charitable entities should be invested as per forms and modes prescribed u/s 11(5) of Income Tax Act. The forms and modes of investing or depositing under section 11(5) as per Income Tax Act is as follows:

- Investment in savings certificates and any other securities or certificates issued by the Central Government under the Small Savings Schemes of that Government;
- Deposit in any account with the Post Office Savings Bank;

- Deposit in any account with a scheduled bank or a co-operative society engaged in carrying on the business of banking (including a co-operative land mortgage bank or a co-operative land development bank).
- Investment in units of the Unit Trust of India
- Investment in any security for money created and issued by the Central Government or a State Government;
- Investment in debentures issued by, or on behalf of, any company or corporation both the principal whereof and the interest whereon are fully and unconditionally guaranteed by the Central Government or by a State Government;
- Investment or deposit in any public sector company:
- Deposits with or investment in any bonds issued by a financial corporation which is engaged in providing long-term finance for industrial development in India and which is eligible for deduction under clause (viii) of sub-section (1) of section 36;
- Deposits with or investment in any bonds issued by a public company formed and registered in India with the main object of carrying on the business of providing long-term finance for construction or purchase of houses in India for residential purposes and which is eligible for deduction under clause (viii) of sub-section (1) of section 36;
- Deposits with or investment in any bonds issued by a public company formed and registered in India with the main object of carrying on the business of providing long-term finance for urban infrastructure in India.
- Investment in immovable property.
- Deposits with the Industrial Development Bank of India
- Investment in the units issued under any scheme of the mutual fund.

8. BUYING AND SELLING OF LAND :-

Following points should be considered while dealing with transaction related to Land:

- As per provisions contain in sec 194-IA of Income Tax Act, if any buyer responsible for paying to a resident seller any amount exceeding or equal to Rs. 50 Lakhs for sale of immovable property other than agricultural land, then the buyer is required to deduct TDS @ 1% of consideration for transfer of immovable property. It is to be deposited to Central Government within a period of 30 days from the end of the month in which deduction is made and it should be accompanied by a statement in Form 26QB.
- As per Section 269SS, no person shall accept from any person any sum of money, whether as advance or otherwise, in relation to transfer of an immovable property otherwise than by an account payee cheque or account payee bank draft or by electronic clearing system through a bank account, if the amount of such loan or

deposit or such specified sum is twenty thousand rupees or more.100% of such sum will be the quantum of penalty that can be levied by the assessing officer on contravention of this provision.(w.e.f 01-06-2015)

- Similarly, as per section 269T, no person shall repay any specified advance received by it, otherwise than by an account payee cheque or account payee bank draft or by electronic clearing system through a bank account, if the amount or aggregate amount of loans or deposits or specified advances is twenty thousand rupees or more. 100% of such sum will be the quantum of penalty that can be levied by the assessing officer on contravention of this provision. (w.e.f 01-06-2015),

As per the G.O (M.S)265/64/Rev.Dated 15/4/1964 property of religious institution can be transferred to Charitable institution at reduced stamp duty of 2.5%.

9. CONDUCTING OF KURIES& OTHER BUSINESSES :-

As per the Provisions of Chit Fund Act, 1982, religious/charitable institution are not permitted to run chit/kuri business. Or to invest in Chit/ Kuri.

10. REGISTRATION (Section 12AB) :-

All Charitable trusts and exempt institution which are already registered under section 12A or section 12AA and Section 10(23C) of Income Tax Act, 1961 will now be required to obtain **fresh registration** by December 31, 2020. All the existing registered trusts under the erstwhile section 12A or section 12AA would move to new provision section 12AB. Summary of Registration procedures u/s 12AB & Section 10(23C) is given below:

Category	Application	Validity Period	Income on which new provisions and registration shall apply	Time period in which order shall be passed
All applications pending under Section 12AA &	At least one month prior to the commencement of the previous year relevant to the assessment year for which approval is sought.	provisional registration for three years	Immediately following the financial year in which such application is made	Within one months, calculated from the end of the month in which the application was received
Charitable / religious trusts/ institutions etc. registered	Within three months from the Commencement of the new provisions i.e. 01.10.2020	Five years	Assessment year from which approval was earlier granted to it	Within three months, calculated from the end of the month in

under existing laws.				which the application was received
Charitable / religious trusts/ institutions etc. whose registration expired under the new provisions in 5 years.	At least Six months prior to the expiry of the registration.	for five years after verifying the genuineness of the activities and objects by calling for any document as, they may deem fit.	Immediately following the financial year in which such application is made	Within six months, calculated from the end of the month in which the application was received
Charitable / religious trusts institutions etc. having provisional registration under new provisions.	Within Six Months from the commencement of activities or six months prior to the expiry of provisional registration, whichever is earlier.	for five years after verifying the genuineness of the activities and objects by calling for any document as, he may deem fit.	From the first of the assessment years for which provisional Registration granted.	Within six months, calculated from the end of the month in which the application was received
In case of modification or alteration in the objects of the charitable/religious trusts institution	within 30 days from the day of modification of objects.	for five years after verifying the genuineness of the activities and objects by calling for any document as, they may deem fit.	Immediately following the financial year in which such application is made	Within six months, calculated from the end of the month in which the application was received

Registration becomes inoperative due to operation of first proviso to Section 11(7)	At least six months prior to the commencement of the assessment year from which the said registration is sought to be made operative.	for five years after verifying the genuineness of the activities and objects by calling for any document as, they may deem fit.		Within six months, calculated from the end of the month in which the application was received
Others Cases- New Registration	At least one month prior to the commencement of the previous year relevant to the assessment year for which approval is sought.	provisional registration for three years	Immediately following the financial year in which such application is made	Within one months, calculated from the end of the month in which the application was received

- If a Trust is registered u/s. 12A/ 12AA and either u/s. 10(23C) and makes an application either u/s. 10(23C) then the registration u/s.12AB will not be operative and vice versa if a Trust makes an application u/s. 12AB then the approval u/s. 10(23C) will be inoperative. In short henceforth the Trust will be able to enjoy exemptions either u/s. 10(23C) or u/s. 12AB.-[Section 11(7)]
- In case where Commissioner or Principal Commissioner is satisfied that the charitable/religious trusts institution etc. have not complied with the objects mentioned or any other law, shall cancel the registration of charitable/religious trusts institution etc. after providing the reasonable opportunity of being heard.

Note: Details of forms and other requirements for renewal of registration as per section 12AB & 10(23C) will be intimated when the same has been notified by the department.

11. INCOME TAX EXEMPTIONS FOR CHARITABLE/RELIGIOUS INSTITUTION :-

The two main sections that grant exemption to the income of trusts are Section 11 and Section 12 of the Income Tax ACT, 1961. In addition to these two sections, Section 10(23C) also exempts the income of institutions working in the field of education or medical relief. A brief analysis of the same is given below:

2.1 Applicable for all Charitable/Religious Institution

Charitable/Religious Institutions which are registered under section 12AA of the Act can claim exemptions under section 11 & 12 of the Income Tax Act. Also they are required to apply/accumulate 85% of its income to its objects.

2.2 Applicable to Educational Institution

- Any income received by educational institution which is wholly and substantially financed by the Government is exempt under 10(23C)(iiiab). When the Government grant to such educational institution, exceeds fifty percent of the total receipts including any voluntary contributions of such educational institution, during the relevant previous year, the institution is said to be substantially financed by the Government;
- Any income received by of educational institutions is exempt u/s 10(23C)(iiiad), if the aggregate annual receipts do not exceed Rupees one crore;
- Any income received by educational institution other than above is exempt under section 10(23C)(vi). In order to claim this exemption they are required to take registration and also they have to apply 85% of its income to its objects.

2.3 Applicable to Medical Institution

- Any income received by of medical institutions is exempt u/s 10(23C)(iii ae), if the aggregate annual receipts do not exceed Rupees one crore
- Any income received by medicinal institution other than above is exempt under section 10(23C)(vi a). In order to claim this exemption they are required to take registration and also they have to apply 85% of its income to its objects.

12. FILING OF INCOME TAX RETURN AND OTHER FORMS :-

The income earned by charitable trusts is not chargeable to tax if it satisfies the conditions provided in the income tax law. In order to claim exemption the trust has to be registered under Income Tax Act, 1961. In order to claim exemption, 85% of the income is applied for charitable purposes.

Following are the some of the forms to be filed with income tax department in order to avail the tax exemption:

- A Charitable Trust which enjoys exemption u/s 10(23C), 11 and 12 are required to file a return within the time prescribed by S. 139(1) if its total income without considering the exemption u/s 11&10 is above the taxable limit (Rs.2,50,000). Currently, Trusts which are required to get their accounts audited are required to file their Income Tax Return in the prescribed form (ITR-7) and audit report. Audit report has to be submitted in Form 10B for those who claim exemption u/s

11&12) and in Form 10BB for those who claim exemption u/s 10(23C). After amendments in the Income Tax Act, 1961 wide Finance Act, 2020, last date for filing (Income Tax Return is changed to 31st October but audit report is to be filed before 30th September. However for the financial year 2019-20 (AY 2020-21) **due to COVID -19, this date is extended till 30th November.**

- Where 85% of the income is not applied for charitable purposes, the trust is required to accumulate or set apart such income for specific purposes and it should be used within 5 years. In such case the trust should furnish a statement in the prescribed form 10 to the Assessing Officer. It should be furnished electronically by the trust within the time allowed for filing return of income u/s 139(1)
- From Asst year 2018-19 onwards, Exemption under sections 11,12 and 10(23C) to the trust shall not be allowed if it does not furnish the return of income within the time allowed under section 139(1)
- If a Trust is required to furnish a return of income under section 139, fails to do so within the time prescribed in section 139(1),they shall pay, by way of fee, a sum of,—
 - Rs. 5,000, if the return is furnished on or before the 31st day of December of the assessment year;
 - Rs. 10,000 in any other case:

However, the total income of the person does not exceed Rs. 5,00,000, the fee payable under this section shall not exceed Rs. 1,000.

13. LAND CEILING :-

i) Kerala Land Reforms ACT

The Act provides for imposition of ceiling on holdings of lands are covered by Section 82. However certain kinds of lands are exempted from ceiling limit (Section 81)

ii) Land ceiling provisions and exemption

Ceiling provisions are covered by Sec. 82 which read as follows

“82. *Ceiling area-*

The ceiling area of land shall be

<i>Sole Member</i>	<i>Standard Acre</i>	<i>Not More than</i>
<i>1</i>	<i>5</i>	<i>7.5</i>
<i>2 or more</i>	<i>10</i>	<i>15</i>
<i>5 or more</i>	<i>10</i>	<i>20</i>

(Word used in Section 82 is standard Ace. Standard Acre differ from area of measurement, it would be different in different districts and Taluk depending upon the Nature of land.

For Eg: Land used principally for growing arecanut trees is One standard Acre is equal to 50 cents only. Whereas land used for cultivation of Cashew one standard Acre equal to 200 cents.

Detail list given in Schedule II of Kerala Land Reforms Act 1963)

“The lands owned or held by a private trust or a private institution shall be deemed to be lands owned or held by the person creating the trust or establishing the institution, if he is not alive, by his successors-in-interest.

5. In computing the ceiling area, land exempted u/s 81 shall be excluded.”

iii) As per Sec. 81 (a) (t) (ii) and (iii) which appears in Chapter III of Kerala Land Reforms Act 1/1964, which deals with exemption from ceiling area provisions.

S.81 deals with exceptions from ceiling provisions which are applicable to various institutions, properties of State and Central Government, local authorities, Cochin Port Trust, lands under the management of Court of Wards, factories, workshops, private forests, plantations (as defined in S.2(44) lands mortgaged by Government, Co-operative Societies, Kerala Financial Corporation, Kerala Industrial Development Corporation, Small Scale Industries Corporation, Commercial or Industrial Undertaking, house sites, tanks, sites of temples, churches, mosques, cemeteries and burial and burning ground, warehouses, lands occupied by Educational Institutions including land necessary for the convenient use of the institutions and play grounds attached to such institutions:

Sec.81 (a) (t) (ii) relates to exemption for a religious, charitable or educational institution of a public nature. Sec.81 (a) (t) (iii) deals with exemption to public trust (which expression shall include a wakf) .

(As per GO(RT)No. 2544/2012(RD) dated 31/5/2012 issued by Revenue (N) Department, guidelines issued for getting certificate of exemption of places of public, religious, worships under Section 14 of the Land Reforms Act).

14. FOREIGN CONTRIBUTION (REGULATION) ACT, 2010 (FCRA) - AMENDMENTS:-

The Parliament has recently passed Foreign Contribution Regulation Amendment Bill 2020 which includes some provisions seriously affecting the smooth functioning of our Religious and Charitable Institutions.

The new rules will be made effective from the date notified by Government after getting approval from the President of India.

Major changes affecting our Institutions are shown below :-

- I. **SECTION-7 :-** Institutions registered under FCR Act cannot transfer those funds to any other Institutions.

(As per the existing provision, FCRA registered institutions can transfer FC funds to other FCRA registered Institutions without any limit. FCRA Registered Institutions can transfer a part of FC funds to other Institutions not registered under FCRA with prior approval of Central Government).

Comments :- In our case the Diocese or Major Institutions are accepting donations from abroad and distribute the same for implementation to churches and other small societies in rural areas. For example Caritas India is getting foreign Contribution from Donor Agencies abroad for various natural calamities and Rural Development Project and utilize the fund through various Dioceses or charitable societies all over India by transferring the fund to them. As per the new section such transfer is not permitted. Hence our Institutions in rural areas cannot implement such charitable activities for relief of the poor by utilizing Foreign Contributions. There are many charitable organizations in India like Caritas India, CNEWA India, SAFP India, CRS, etc., which are engaged in helping other Religious and Charitable organizations in India, out of Foreign Contributions for various religious and charitable activities for the welfare of the poor and needy. The working of such major organizations will be also be affected as per the new provisions.

- II. **SECTION -17 :-** Designated FCRA Account can be opened by the Institutions all over India at State Bank of India, New Delhi only.

(As per the existing provision exclusive bank account for the FCRA can be opened by Institutions at any branch of any nationalized or scheduled banks all over India as per the convenience of the Institutions)

Comments :- This will create many practical problems to the Institutions working at different part of India especially in rural and remote areas and working for the poor and needy.

III. **Section -8** :- Amount which can be spent by the FCRA registered institutions for administrative expenses should not exceed 20% of the FC funds received.
(As per the existing provisions, the administrative expenses can be up to 50% of the donations received)

Comments :-

Many of our major institutions which are implementing major projects at different parts of India has to employ qualified persons to regularly supervise and implement the programme. Salary, Travelling Expenses, office expenses and other Administrative Expenses are to be met by the Institutions. Hence the limit of 20% for administrative expenses will affect the effective implementation for the welfare projects.

Parliament has already passed the amendments hence it will be made effective immediately.

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