

## Index - IBS ( DT )

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
<b>1</b>	<b><u>Basic Concept, Tax Rates and Exempt Income</u></b>		
	Overview of Tax		1.1
	Definition - Person, Assessee, AY & PY		1.2
	General Rule ( Taxability ) & Exception		1.3
	Application of Income V/s Diversion of Income		1.3
	Charging section	4	1.4
	Calculation of Total Income & Tax ( Format )		1.4
	Rounding Off		1.5
	General Tax Rates [Individual/HUF/AOP/BOI/AJP]		1.5
	Rebate [Old Scheme]	87A	1.6
	General Tax Rates [Firm/Local Authority/Company/Co-Op. Society]		1.6
	Surcharge [Individual/HUF/AOP/BOI/AJP]		1.7
	Surcharge [Firm/Local Authority/Company/Co-Op. Society]		1.8
	Health & Education Cess		1.8
	Marginal Relief		1.9
	Average Tax Rate		1.10
	Maximum Marginal Rate [MMR] @ 42.744%		1.10
	<b>Special Tax Rates [Compulsory]</b>		1.11
	<b>Concessional Tax Rates [Optional]</b>		1.11
	<i>(1) Company &amp; Co-Operative Society</i>	115BAA to BAE	1.11
	<i>(2) Individual/HUF/AOP/BOI/AJP</i>	115BAC	1.13
	Marginal Relief in Default tax regime u/s 115BAC	87A	1.14
	Exempt Income - Agriculture Income in India	10(1)	1.14
	Exempt Income - Amt Received by Member from HUF	10(2)	1.15
	Exempt Income - Share Income received by Partner from Firm/LLP	10(2A)	1.15
	Exempt Income - Compensation from Govt/Local Authority by Individual/Legal on account of Disaster	10(10BC)	1.15
	Exempt Income - Income of Sikkimese Individual	10(26AAA)	1.15
<b>2</b>	<b><u>Capital Gains</u></b>		
	Charging Section	45	2.1
	Definition - Capital Asset		2.1
	<b>Types of Capital Assets [STCG/LTCG] / Holding Period</b>		2.2
	Transfer		2.2
	Transactions not regarded as Transfer	47	2.2
	Period of Holding [Special Cases]		2.3
	Calculation of Capital Gain [LTCG/STCG]	48	2.4
	Full Value of Consideration / Sale Consideration (FVOC/SC)		2.5
	FVOC/SC - Land & Building	50C	2.5
	FVOC/SC - Unlisted Shares	50CA	2.6
	FVOC/SC - When sale price not ascertainable = FMV	50D	2.6
	Transfer Expenses		2.6
	Cost of Acquisition (COA) [Normal & Special Cases]		2.7
	Indexed Cost of Acquisition [ICOA]		2.7
	Cost of Improvement		2.8

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
	Indexed Cost of Improvement		2.8
	<b>Capital Gain in Special cases</b>		2.9
	(1) Capital Asset Destroyed & amount received from Insurance company	45(1A)	2.9
	(2) Capital Asset Converted from Stock in trade	45(2)	2.9
	(3) Capital Asset Introduced to Firm/AOP/BOI by Partner/Member as Capital Contribution	45(3)	2.10
	(4) Compulsory acquisition of Capital Asset	45(5)	2.10
	(5) Capital Gain in case of Joint Development Agreement	45(5A)	2.10
	(6) Distribution on liquidation of company	46	2.11
	(7) Buyback of Shares or securities [ Rate : 23.296% ]	46A / 115Q	2.11
	(8) Redemption / Transfer of Market Linked Debenture and Specified Mutual Fund	50AA	2.11
	(9) Slump Sale	50B	2.12
	(10) Capital asset distributed on dissolution/reconstruction of specified entity [Firm/AOP/BOI]	9B/45(4)	2.13
	(11) ULIP receipt on maturity	45(1B)	2.16
	Advance Money Forfeited	51	2.17
	Exemption from Capital Gain	54/54B/54D	2.17
	Exemption from Capital Gain	54EC/54F	2.18
	Exemption from Capital Gain [Eligible - Any Person]	54G/GA	2.19
	<b>Tax Rates on Capital Gains</b>	111A/112A/112	2.20
<b>3</b>	<b><u>Profit &amp; Gain from Business and Profession</u></b>		
	Charging Section	28	3.1
	Computation of PGBP Income	29	3.1
	Rent, Rates, Repairs & Insurance for Building used in B&P	30	3.2
	Repairs & Insurance of P&M, Furniture	31	3.2
	Depreciation	32	3.2
	Deduction for Tea/Coffee/Rubber Business	33AB	3.10
	Deduction for Petroleum and Natural Gas Business	33ABA	3.11
	Scientific Research Expenditure	35	3.12
	Expenses for obtaining Telecom Spectrum / Telecom License	35ABB	3.13
	Expenditure on Specified Business	35AD	3.14
	Deduction of Expenses incurred on Agricultural Extension Project	35CCC	3.15
	Deduction of Expenses incurred on Skill Development Project	35CCD	3.15
	Priliminary Expenses	35D	3.15
	Expenses on Amalgamation and Demerger	35DD	3.16
	Expenses incurred Voluntary Retirement Scheme (VRS)	35DDA	3.16
	<b>Other Deductions</b>	36	3.16
	<b>General Deductions</b>	37	3.19
	Non Deduction / Deposition of TDS	40(a)(i)/(ia)	3.21
	Non Deduction / Deposition of Equalisation Levy	40(a)(ib)	3.21
	Payment to Specified Person	40A(2)	3.22
	Cash Payment	40A(3)	3.22
	Payment of Interest and Remuneration [Salary/Bonus/Commission/Royalty] to Partners by Firm/LLP	40b	3.23
	Deemed PGBP Income	41	3.25
	Expenses Allowed on Actual Payment basis	43B	3.25
	Sale Consideration of land & Building (If held as Stock in Trade)	43CA	3.27

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
	Income from Construction and Service Contracts	43CB	3.27
	Special provision for Trade, Professional or Similar Associations	44A	3.27
	Compulsory Maintenance of Books of Accounts	44AA	3.28
	Tax Audit of Books of Accounts	44AB	3.28
	Presumptive Taxation u/s 44AD/44ADA/44AE		3.29
	Royalty Income in respect of Patent Developed & Registered in India	115BBF	3.31
	Income From Transfer of Carbon Credits	115BBG	3.31
	Method of Accounting for PGBP and IFOS	145	3.31
	Income Computation and Disclosure Standards	ICDS	3.32
<b>4</b>	<b><u>Income from Other source</u></b>		
	Charging Section	56	4.1
	Dividend Income		4.1
	Income from Units of UTI / Mutual Funds		4.3
	Casual Income Other Than Winnings from Any Online Game	115BB	4.3
	Winnings from Online Games	115BBJ	4.3
	Interest Income		4.5
	Interest on Compensation / Enhanced Compensation		4.5
	Advance Money Forfeited		4.5
	Income from Rention of Plant & Machinery/Furniture		4.5
	Family Pension		4.6
	Salary Income of MP/MLA		4.6
	Amount received under Life Insurance Policy other than ULIP & Keyman Insurance Policy		4.6
	Amount received in Excess of FMV of Shares Issued by Closely held Company		4.6
	Money or Property received Without consideration or for Inadequate Consideration in Excess of RS 50,000/ Taxability of Gifts	56(2)(x)	4.7
	Undisclosed Income		4.9
	Income from Transfer of Virtual Digital Assets	115BBH	4.10
	Other Income Not Taxable Under Other Heads and Not Exempt		4.10
<b>5</b>	<b><u>Clubbing of Income</u></b>		
	Clubbing of Income		5.1
	Clubbing of Spouse Income	64	5.1
	Clubbing of Son's Wife Income		5.2
	Clubbing of Minor Child Income	64(1A)	5.2
	Cross Transfer		5.2
	Asset Transfer to HUF	64(2)	5.3
	Other Point relating to Clubbing		5.3
<b>6</b>	<b><u>Set-Off and Carry forward of Losses</u></b>		
	Set-off of Losses		6.1
	Exceptions in Inter Source [Same Head] Set-Off		6.1
	Exceptions in Inter Head [Different Head] Set-Off		6.1
	Carry Forward of Losses		6.2
	Carry Forward & Set-off of Accumulated Business Losses and Unabsorbed Depreciation in case of Amalgamation / Demerger / Conversion	72A	6.2

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
	Carry Forward & Set-off Losses in case of Change in Constitution of Firm or Succession	78	6.3
	Special Provision for Carry Forward & Set-off of Losses in case of Closely Held companies	79	6.4
	No Set-off of Losses against Undisclosed Income found in Search and Survey	79A	6.5
	Order of Set-off [In case of Business]		
	Submission of Return of Losses	80	6.5
<b>7</b>	<b><u>Deductions under Chapter VI-A and Section 10AA</u></b>		
	Basics		
	<b>Payment / Investment Based Deductions</b>		7.1
	Speified Investment	80C	7.1
	Contribution to Pension Fund / Annuity Plan of LIC or Other Insurance Company	80CCC	7.2
	Contribution to pension Scheme of Central Government / New Pension Scheme / Atal Pension Yojana	8.CCD	7.2
	Aggregate Deduction u/s 80C + 80CCC + 80CCD(1)	80CCE	7.3
	Deduction in respect of Contribution to Agnipath Scheme	80CCH	7.3
	Deduction in respect of Medical / Health Insurance premium, CGHS, Preventive Health Checkup	80D	7.3
	Deduction in respect of Maintenance and Medical Treatment of Disabled Dependent Relative	80DD	7.4
	Deduction for Disabled Assessee	80U	7.5
	Deduction in respect of Medical Treatment of Specified Disease	80DDB	7.5
	Deduction in respect of Interest Paid on Loan taken for Higher Education in India or Abroad	80E	7.5
	Deduction in respect of Interest on Loan taken for Purchase of Residential House Property	80EEA	7.5
	Deduction in respect of Interest on Loan taken for Purchase of Electric Vehicle	80EEB	7.6
	Donations	80G	7.6
	Deduction in respect of Rent Paid for House Property	80GG	7.6
	Deduction in respect of Donation for Scientific Research or Rural Development	80GGA	7.7
	Donation given by Indian Company to Political Parties or Electoral Trust	80GGB	7.7
	Donation given by Any Other Person to Political Parties or Electoral Trust	801GGC	7.8
	<b>Income Based Deductions</b>		7.8
	Deduction in respect of Interest on deposits in Savings Account	80TTA	7.8
	Deduction in respect of Interest on deposits in Savings and FD Account in case of Resident Senior Citizens	80TTB	7.8
	<b>Income Based Deductions under Heading C</b>		7.9
	Deduction in respect of Profits of Certain Eligible Business	80IA/ 80IAB/ 80IB/ 80IC/ 80IE	7.9
	Deduction for Eligible Startup	80IAC	7.9
	Deduction in respect of Business of Developing & Building Housing Projects / Rental Housing Projects	80IBA	7.9
	Deduction in respect of Employment of New Employees	80JJAA	7.10
	Deduction in respect of Inter Corporate Dividend	80M	7.9

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
	Deduction in respect of Royalty Income from Books Literary, Artistic, Scientific Nature	80QQB	7.10
	Deduction in respect of Royalty Income from Patents	80RRB	7.11
	Deduction in respect of Income of Co-operative Societies	80P	7.11
	Deduction in respect of Income of Producer Companies	80PA	7.12
	Tax Holiday for Units Established in SEZ	10AA	7.12
<b>8</b>	<b><u>Assessment / Taxation of Various Entities</u></b>		
	Taxation of Local Authority	10(20)	8.1
	Taxation of Co-Operative Society	80P	8.1
	Taxation of AOP/BOI and their Members	167B	8.1
	Alternate Minimum Tax [AMT]	115JC	8.3
	Minimum Alternate Tax [MAT]	115JB	8.4
	Taxation of Buyback of shares by Domestic company	115QA	8.7
	Tonnage Taxation / Special Provision relating to Income of Indian Shipping Companies	115JV to 115VZC	8.8
	Taxation of Business Trust	115UA	8.9
	Taxation of Investment Fund	115UB	8.12
	Taxation of Securitisation Trust	115TCA	8.13
<b>9</b>	<b><u>Charitable Trust, Political Parties and Electoral Trust</u></b>		
	<b>Part I - Taxation of Charitable/Religious Trust</b>		9.1
	Meaning of Charitable		9.1
	Income of Educational Institution [School, College, University] or Medical Institution [Hospital] which exist solely for Educational or Medical Purpose and Not for Profit	10(23C)	9.1
	Income of Charitable / Religious Trust	11	9.2
	Special Provisions regarding Certain Incomes of Trust		9.4
	Condition for Applicability of Section 11	12A	9.6
	Procedure for Registration	12AB	9.6
	Section 11 Shall not Apply in Certain Cases	13	9.7
	Tax on Specified / Deemed Income of Certain Trust or Institutions	115BBI	9.8
	Format to Calculate Total Income of Trust		9.9
	Tax on Accreted Income of Certain Trust/Institution / Exit Tax @ <b>34.944%</b>	115TD	9.10
	<b>Part II - Taxation of Political Parties &amp; Electoral Trust</b>		9.13
	Taxation of Political Parties	13A	9.13
	Taxation of Electoral Trust	13B	9.13
<b>10</b>	<b><u>TDS, TCS, Advance Tax, Interest and Refund</u></b>		
	<b>Part I - Tax Deduction at Source [TDS]</b>		10.1
	TDS Basics		10.1
	Salary	192	10.2
	Accumulated Balance of RPF	192A	10.2
	Interest on Securities	193	10.2
	Dividend	194	10.3
	Interest [Other than Interest on Securities]	194A	10.3
	Casual Income [Other than Horse Race and Online Games]	194B	10.3
	Winnings from Online Games	194BA	10.4
	Horse Race	194BB	10.4
	Payment to Contractor / Sub-contractor	194C	10.4

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
	Insurance Commission	194D	10.5
	Life Insurance Policy Amount	194DA	10.5
	Payment to NR Sportman / Sports Association / Entertainer	194E	10.5
	Commission on Sale of Lottery Tickets	194G	10.6
	Commission or Brokerage	194H	10.6
	Rent	194I	10.6
	Purchase of Immovable property [other than Rural Agriculture Land]	194IA	10.7
	Rent of Immovable Property	194IB	10.7
	Payment under Joint Development Agreement	194IC	10.7
	Professional Fees, Technical Fees, Royalty, Non Compete Fees, Director Remuneration	194J	10.8
	Income from UTI/Mutual Fund Units	194K	10.8
	Compensation on Compulsory Acquisition Of Immovable Property	194LA	10.8
	Interest on Infrastructure Debt Fune	194LB	10.8
	Interest on Foreign Currency Borrowing made by Indian Co.or Business Trust	194LC	10.9
	Interest to FII/QFI	194LD	10.9
	Contract, Commission/Brokerage, Professional Fees	194M	10.9
	Cash Withdrawal	194N	10.9
	Certain Payments by E-Commerce Operator to E-Commerce participants	194O	10.10
	Income of Specified Senior Citizen	194P	10.10
	Purchase of Goods	194Q	10.10
	Benefits or Perquisite in respect of Business & Profession	194R	10.11
	Transfer of Virtual Digital Asset	194S	10.12
	Any Sum payable to NR/FC [Except Covered in other Sections	195	10.12
	<b>Other Points Regarding TDS</b>		10.12
	<i>Certificate of lower / No Deduction</i>		10.12
	<i>Assessee in default</i>	201	10.12
	<i>Mandotory requirement of furnishing PAN</i>	206AA	10.12
	<i>Higher rate of TDS for non filing of income tax return</i>	206AB	10.12
	<i>Due dates of payment of TDS</i>		10.13
	<i>Due dates of TDS Returns/Statement</i>		10.13
	<i>Interest on Late deduction/Late payment of TDS</i>	201(1A)	10.13
	<b>Part II- Tax Collection at Source [TCS]</b>		10.14
	TCS Basics		10.14
	TCS Applicability and Rates	206C	10.14
	Specified Goods	206C(1)	10.14
	Motor Vehicle	206C(1F)	10.14
	Lease or License	206C(1C)	10.14
	Remittance under LRS of RBI and Overseas Tour package	206C(1G)	10.15
	Sale of Goods	206C(1H)	10.15
	<b>Other Points Regarding TCS</b>		10.15
	<i>Mandotory requirement of furnishing PAN</i>	206CC	10.15
	<i>Higher rate of TCS for non filing of income tax return</i>	206CCA	10.15
	<i>Due dates of payment of TCS</i>		10.15
	<i>Due dates of TCS Returns/Statement</i>		10.16
	Fees for Default in Furnishing TDS/TCS Statement	234E	10.16
	Types of TDS/TCS Questions and Presentation of answer		10.16

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
	<b>Part III - Advance Tax, Interest, Recovery, Refund</b>		10.17
	Advance Tax		10.17
	Interest u/s 234A/234B/234C		10.17
	Interest for delay in filing of ROI	234A	10.17
	Interest for Short Payment of Advance Tax	234B	10.18
	Interest for Deferment of Advance tax installments	234C	10.18
	Fees for Default in Filing ROI	234F	10.19
	Modes of Recovery of Tax ( AO & RO )		10.19
	Refund / Interest on Refund		10.19
<b>11</b>	<b><u>Income tax Authorities, Return filing and assessment Procedures</u></b>		
	<b>Part I - Income Tax Authorities</b>		
	Level of Income Tax Authorities		11.1
	Central Board of Direct Taxes [CBDT]		11.1
	Powers of Income Tax Authorities		11.2
	General Powers	131	11.2
	Power to call for Information	133	11.2
	Power of Survey	133A	11.2
	Power to collect Information	133B	11.3
	Power of Search and Seizure	132	11.3
	<b>Part II - Return Filing &amp; Self Assessment</b>		11.6
	Filing of Return of Income [ROI]	139(1)	11.3
	Loss Return	139(3)	11.7
	Belated Return	139(4)	11.7
	Revised Return	139(5)	11.7
	Defective Return	139(9)	11.8
	Permanent Account Number [PAN]	139A	11.8
	Aadhaar Number	139AA	11.9
	Tax Return Preparer	139B	11.9
	Verification of Return	140	11.1
	Self-Assessment	140A	11.1
	Updated Return of Income	139(8A)	11.1
	<b>Part III - Assessment Procedure by Department</b>		11.12
	Inquiry Before Assessment	142	11.12
	Processing of Return / Intimation / Summary Assessment	143(1)	11.13
	Scrutiny Assessment	143(3)	11.13
	Best Judgement Assessment	144	11.14
	Reference to Dispute Resolution Panel (DRP)	144C	11.14
	Income Escaping Assessment	147 To 151	11.15
	Tiem Limit for Completion of Assessment	153	11.17
	Rectification of Mistake	154	11.17
	Demand Notice	156	11.18
	Notice of AO Deemed to be Valid in Certain Cases	292BB	11.18
	Faceless Assessment	144B	11.19
<b>12</b>	<b><u>Appeals and Revision</u></b>		
	Basics		12.1
	Appeal to JCIT(A) / CIT(A)	246 To 251	12.1
	Appeal ITAT	252 To 255	12.2
	Appeal to High Court	260A & B	12.4
	Appeal to Supreme Court	261 & 262	12.4

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
	Special Provision for Appeal by Department	268A	12.5
	Revision of Orders Rrejudicial to the Interest of Revenue	263	12.5
	Revision of Other Orders	264	12.6
<b>13</b>	<b><u>Dispute Resolution</u></b>		
	Dispute Resolution Committee [DRC]	245MA	13.1
<b>14</b>	<b><u>Penalties Offence and Prosecution</u></b>		
	<b>Part I -Penalties</b>		14.1
	Penalty for Under Reportion of Income	270A	14.1
	Other Penalties		14.2
	<b>Part II- Offences &amp; Prosecution</b>		14.5
<b>15</b>	<b><u>Miscellaneous Provisions</u></b>		
	Mode of Taking or Acception Loans, Deposit or Advance	269 SS	15.1
	Repayment Of Loan, Deposit or Advance	269T	15.2
	Mode of Undertaking Transactions	269ST	15.2
	Providing Facility for Acceptance of Payment Through Prescribed Electronic Modes	269 SU	15.3
	Transfers to Defraud Revenue Void	281	15.4
	Provisional Attachment to Protect the Interest of Revenue	281 B	15.4
	Service of Notice	282	15.4
	Appearance by Authorised Representative	288	15.5
	ROI etc. Not to become Invalid	292B	15.5
	Statement of Financial Transation (SFT) or Reportable Account	285BA	15.5
<b>16</b>	<b><u>Tax Planning, Tax Evasion and Tax Avoidance [GAAR]</u></b>		16.1
	Tax Management, Planning, Evasion and Avoidance		16.1
	General Anti Avoidance Rule	GAAR	16.1
<b>17</b>	<b><u>Tax Audit and Ethical Compliances</u></b>		17.1
	Tax Audit of Books of Accounts	44AB	17.1
	Form 3CA and Form 3CB		17.2
	Form 3CD - Statement of Particulars Required to be Furnished u/s	44AB	17.2
	Ethical Compliances and Implications		17.7
<b>18</b>	<b><u>Black Money Act &amp; Imposition of Tax Law</u></b>		
	Basic and charge of Black Money Tax ( @ 30% ) & Definitions		18.1
	Value of Undisclosed Foreign Assets		18.1
	Valuation Date ( 1st of relavant PY )		18.3
	Conversion rates used for conversion of FA into INR		18.3
	Deduction of expenses from undisclosed FI & FA		18.3
	Penalties		18.4
	Offences and Prosecution		18.4
<b>19</b>	<b><u>Double Tax Relief</u></b>		
	Basic of Double tax relief		19.1
	Bilateral Relief (DTAA Exist)	90	19.1
	Unilateral Relief (No DTAA between contries)	91	90.2
	Other Special points for Calculation		19.6
	Permanent Establishment [PE] - Definition		19.7

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
<b>20</b>	<b><u>Non Resident Taxation</u></b>		
	Residential Status of Individual	6	20.1
	Residential Status of HUF	6	20.2
	Residential Status of Firm/AOP/BOI/LA/AJP	6	20.2
	Residential Status of Company	6	20.3
	Scope of Total Income	5	20.4
	<b>Income deemed to be earned [Accrue or Arise] in India</b>	9	20.4
	Accrue or arise outside india	9(1)(i)	20.4
	Amendment due to vodafone Case	9(1)(i)	20.6
	<i>Salary Income from services rendered in India</i>	9(1)(ii)	20.7
	<i>Salary payable by Indian Govt. to Indian Citizen for services rendered outside india</i>	9(1)(iii)	20.7
	<i>Dividend</i>	9(1)(iv)	20.7
	<i>Interest Income</i>	9(1)(v)	20.7
	<i>Royalty Income</i>	9(1)(vi)	20.8
	<i>Fees for Technical Services</i>	9(1)(vii)	20.8
	<i>Gift money paid by Resident to RNOR/NR/FC</i>	9(1)(viii)	20.8
	Exempt income for Non-Resident		20.9
	<b>Presumptive Taxation for Non-Resident</b>		
	Regular Shipping Business ( <b>Compulsory</b> )	44B	20.9
	Occasional Shipping Business ( <b>Compulsory</b> )	172	20.9
	Aircraft Business ( <b>Compulsory</b> )	44BBA	20.10
	Business of providing services relating to supply of P&M on hire used in Prospecting, extrraction or production of mineral oils ( <b>Optional</b> )	44BB	20.10
	Foreign company engaged in business of civil construction or erection of P&M relating to turnkey power projects ( <b>Optional</b> )	44BBB	20.10
	Deduction in respect of Head office expenses of NR	44C	20.11
	Capital Gain Taxation in case of Non Resident		20.11
	First proviso to Section 48 for Capital Gain calculation	48	20.12
	Special Provisions for Non-Resident Indian [Ch XII-A]	115C to 115I	20.12
	Special Rates for Non Resident or Foreign Company		20.13
	Tax Rates on Interest, Dividend, Royalty, FTS	115A	20.13
	Income from Units of UTI/MF to Overseas Financial Organisation [Offshore Funds]	115B	20.14
	Income from Bonds or GDR of Indian Company purchased in Foreign Currency by NR	115AC	20.14
	Income of Foreign Institutional Investior (FII)	115AD	20.14
	Casual Income	115BB	20.15
	<b>Tax Rate on Certain Income of NR ( Non-Citizen) Sportman, Sport Association, Entertainer</b>	115BBA	20.15
	Common Points-115A, 115AB, 115AC, 115AD, 115BB & 115BBA		20.16
	Application of MAT on Foreign Company	115JB	20.16
	Statutory or Deemed Agent of NR	163	20.16
<b>21</b>	<b><u>Transfer Pricing</u></b>		
	Why transfer pricing?		21.1
	Charging section	92	21.1
	<b>Associate Enterprises (AE)</b>	92A	21.1
	International Transation	92B	21.3

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
	Deemed International Transaction via third person	92B(2)	21.4
	<b>Computation of Arm's Length Price</b>	92C	21.5
	Comparable Uncontrolled Price (CUP) by default if not given		21.5
	Resale Price Method		21.6
	Cost Plus Method		21.7
	Profit Split Method		21.8
	Transactional Net Margin Method (TNMM)		21.9
	Functional Adjustment Shortcut <b>(If extra / only to AE then WCB:ADD, DTFOB&amp;M:LESS)</b>		21.10
	If More than 1 ALP		21.10
	Arithmetic Mean Concept (ALP's More than 1 upto 5)		21.10
	Range Concept (If ALP's 6 or more)		21.11
	Circumstances where AO may determine ALP	92C(3)	21.13
	Consequences of ALP determined by AO	92C(4)	21.13
	Reference to Transfer Pricing Officer (TPO)	92CA	21.14
	Safe Harbour Rules	92CB	21.14
	Advance Pricing Agreement (APA)	92CC & 92CD	21.14
	Secondary Adjustment	92CE	21.16
	Documents to be maintained	92D	21.17
	Audit Report	92E	21.18
	Penalties		21.18
	Country by Country [CbC] Reporting Requirement	286	21.18
	Domestic Transfer pricing	92BA	21.20
	Special Provision for Avoidance of Tax by Certain Transactions in Securities	94	21.20
	Transaction with person in Notified Jurisdictional Area (NJA)	94A	21.20
	Limitation of Interest Deduction	94B	21.21
	<b><u>22 Advance Ruling</u></b>		
	Advance Ruling	245N to 245W	22.1
	Board for Advance Ruling (BAR)		22.1
	Application for Advance Ruling		22.1
	Application Fees		22.1
	Cases where application shaal not be allowed / Rejected by BAR		22.2
	Advance ruling to be Voide		22.2
	Pronouncement of Advance Ruling		22.2
	Powers of BAR		22.2
	Appeal against BAR Order		22.2
	<b><u>23 Taxation of Digital Transation [Equalisation Levy]</u></b>		
	Equalisation Levy [EL]		23.1
	Equalisation Levy on Specified Services (Advt) @ 6%		23.1
	Equalisation Levy on E-Commerce Operator		23.2
	Furnishing Statement		23.3
	Relavant provisions in Income tax Act relating to EL	10(50)/40(a)(ib)	23.3
	<b><u>24 Application and Interpretation of Tax Treaties</u></b>		
	Provision given for Court by Internation courts of Justice		24.1
	Source of International Tax Laws		24.1
	Overview of Tax Treaties /DTAA/Tax Conventions		24.1
	Features of Tax Treaties		24.2
	Application of Tax Treaties		24.2

S.N.	Chapter / Topic	Related Sec. / Rule	Page No.
	Interpretation of Tax Treaties		24.2
	Vienna Convention Law of Treaty (VCLT)		24.4
<b>25</b>	<b><u>Overview of Model Tax Conventions</u></b>		
	Model Convention / OECD and UN Model		25.1
	Title & Preamble		25.1
	Article 1 - Persons Covered		25.1
	Article 2 - Taxes covered		25.1
	Article 3 - General Definitions		25.1
	Article 4 - Resident		25.2
	Article 6 - Permanent Establishment (PE)		25.2
	Article 7 - Business Profit		25.3
	Article 11 - Interest Income		25.3
	Article 12/12A - Royalty /FTS		25.3
	Article 13 - Capital Gains		25.3
	Article 14 - Independent Personal Service (Only UN)		25.4
	Article 21 - Other Income		25.4
	Article 23 - Method for Elimination of Double Taxation		25.4
	Article 24 - Non Discrimination		25.4
	Article 25 - Mutual Agreement Procedure (MAP)		25.4
	Article 26 - Exchange Information		25.4
<b>26</b>	<b><u>Fundamentals of BEPS</u></b>		
	Base Erosion and Profit Shifting		26.1
	Action Plan 1 - Digital Economy		26.1
	Action Plan 2 - Hybrid Mismatch Arrangement		26.1
	Action Plan 3 - Controlled Foreign Corporation (CFC)		26.1
	Action Plan 4 - Interest Income		26.2
	Action Plan 5 - Counter Harmful Tax Practices		26.2
	Action Plan 6 - Preventing Treaty Abuse / Treaty Shopping		26.2
	Action Plan 7 - Prevent the Artificial Avoidance of PE Status		26.3
	Action Plan 8-10 - Transfer Pricing (High Risk Transaction)		26.3
	Action Plan 11 - Measuring and Monitoring BEPS		26.3
	Action Plan 12 - Disclosure of Aggressive Tax Planning Arrangement		26.3
	Action Plan 13 - Re-Examine Transfer Pricing Documentation		26.4
	Action Plan 14 - Making Dispute Resolution More Effective		
	Action Plan 15 - Multilateral Instruments		
<b>27</b>	<b><u>Annexure [Rule 115 &amp; 128]</u></b>		
	Conversion into INR from Foreign Currency	115	A1
	Foreign Tax Credit	128	A1