

Tax Street

A flagship publication that captures key developments in the areas of Tax and Regulatory environment

September 2025



Introduction

Tax Street

● Focus Point	3
● Events and Webinars	4
● From the Judiciary	5
● In The News	6
● Tax Talk	9
● Insights	12
● Compliance Calendar	14

We are pleased to present the latest edition of Tax Street – our newsletter that covers all the key developments and updates in the realm of taxation in India and across the globe for the month of September 2025.

- The '[Focus Point](#)' elaborates upon a pivotal judgment in case of *Hyatt International Southwest Asia Ltd.*
- Under the '[From the Judiciary](#)' section, we provide in brief, the key rulings on important cases, and our take on the same.
- Our '[Tax Talk](#)' provides key updates on the important tax-related news from India and across the globe.
- Under '[Compliance Calendar](#)', we list down the important due dates with regard to direct tax, transfer pricing and indirect tax in the month.

We hope you find our newsletter useful and we look forward to your feedback.

You can write to us at taxstreet@nexdigm.com. We would be happy to hear your thoughts on what more can we include in our newsletter and incorporate your feedback in our future editions.

Warm regards,
The Nexdigm Team

Focus Point

Supreme Court of India in case of Hyatt International Southwest Asia Ltd. v/s Additional Director of Income-tax

The concept of Permanent Establishment (PE) lies at the heart of international taxation, defining the nexus between a foreign enterprise and a taxing jurisdiction. Recently, the Supreme Court of India delivered a pivotal judgment in case of Hyatt International Southwest Asia Ltd ([2025] 176 taxmann.com 783 (SC)) that sheds crucial light on the scope and application of PE under the India-UAE Double Taxation Avoidance Agreement (DTAA). This ruling marks a significant evolution in how Indian tax authorities and courts interpret the PE threshold, especially concerning strategic and managerial functions exercised by foreign entities within India.

The Court's judgment emphasizes that the absence of a formal office or branch does not automatically exclude the existence of a PE if the foreign enterprise exercises substantial control and operational involvement in Indian business activities. This decision firmly establishes the principle of "substance over form" in assessing PE, underscoring that strategic oversight and managerial roles, when continuous and integral, can give rise to a taxable presence in India.

Background

The assessee, Hyatt International Southwest Asia Ltd (Hyatt) is a company incorporated in Dubai, UAE. It entered into agreements with AHL India, AHL Delhi, and AHL Mumbai.

- **Strategic Oversight Services Agreements (SOSA):** Under these agreements, Hyatt provided strategic planning, technical know-how, and managerial oversight to facilitate the efficient development, operation, and management of Hyatt hotels across India.

For the Assessment Year 2009-10, Hyatt declared nil income in India and sought a refund of approximately INR 8.8 million, basing its claim on two principal contentions:

- **Non-taxability under DTAA:** Hyatt argued that the India-UAE DTAA did not have an explicit provision taxing Fees for Technical Services (FTS), and therefore, its income earned under SOSA was not taxable in India.
- **Absence of Permanent Establishment:** Hyatt contended that it did not have a PE in India. It lacked a fixed place of business, did not maintain an office or branch, and the visits by its employees to India were occasional, temporary, and below the nine-month threshold specified in Article 5(2) of the India-UAE DTAA.

Despite these arguments, the Indian tax authorities, the Assessing Officer (AO), the Dispute Resolution Panel (DRP), the Income Tax Appellate Tribunal (ITAT), and eventually the High Court, concluded that Hyatt did have a PE in India by virtue of its operational presence and control over the hotel operations through the SOSA.

Assessee's Arguments

Hyatt's defence rested on several legal and factual points:

- **No Fixed Place of Business:** Hyatt did not have any designated office, branch, or other premises in India exclusively at its disposal. It did not exercise exclusive control over any hotel premises. Further, the visits of Hyatt employees to India were brief, intermittent, and for supervisory purposes only, not sufficient to constitute a fixed place of business.
- **Threshold for PE Not Met:** The presence of its personnel in India was limited and did not meet the minimum threshold (nine months) under Article 5(2)(i) of the DTAA.
- **Distinct Operational Agreements:** The High Court, according to Hyatt, wrongly merged the SOSA with the separate Hotel Operating Services Agreement (HOSA), under which Hyatt India Pvt. Ltd. managed day-to-day operations independently.

- **Nature of Services:** The activities under SOSA were limited to policy formulation, strategic planning, and advisory functions, which did not constitute 'carrying on business' through a fixed place in India.
- **Insufficient Physical Presence:** The infrequent visits of employees across various hotels, with no fixed physical office, could not establish a PE.

Supreme Court's Analysis and Conclusion

The Supreme Court meticulously examined the facts, the provisions of the India-UAE DTAA, the SOSA, and judicial precedents, including the landmark Formula One judgment and international tax conventions (OECD and UN Model Tax Conventions).

Key observations and conclusions include:

- **Definition of PE Under DTAA:** The Court affirmed that a PE requires a 'fixed place of business' at the disposal of the enterprise where business activities are wholly or partly carried on. The notion of disposal implies control and availability for conducting business, not necessarily exclusive possession.
- **Exclusive Possession Not Mandatory:** The Court ruled that having exclusive possession of the premises is not an absolute requirement to establish a PE. Shared or temporary use suffices, as long as business activities are carried out there and the enterprise maintains control.
- **Substantive Control and Operational Involvement:** The SOSA conferred Hyatt with extensive, enforceable rights over the strategic, operational, and financial aspects of the hotels. The assessee's activities extended well beyond advisory roles to active participation in core operations including staff appointments, policy enforcement, marketing, and financial management.
- **Long-Term Stability and Dependence:** The 20-year term of the SOSA, coupled with a fee structure tied to hotel revenues, demonstrated stability, productivity, and economic dependence are hallmark indicators of a PE.
- **Economic Reality Prevails:** The Court underscored the principle that substance prevails over form. Despite the separate legal existence of Hyatt India Pvt. Ltd., the economic substance of Hyatt's operations indicated a PE.
- **Reliance on Formula One Case:** Hyatt leaned heavily on the Supreme Court's precedent in Formula One World Championship Ltd v. CIT which two essential conditions must be satisfied:
 - (i) the place must be 'at the disposal' of the enterprise, and
 - (ii) the business of the enterprise must be carried on through that place mandates
- **Taxability Affirmed:** Based on these facts, the hotel premises were rightly held to constitute a fixed place of business PE under Article 5(1) of the DTAA.

Consequently, the profits attributable to this PE are taxable in India under Article 7.

Thus, the Supreme Court upheld the tax authorities' decision and dismissed Hyatt's appeal.

Our Comments

This ruling represents a watershed moment in India's international taxation jurisprudence, reinforcing the increasingly stringent approach adopted by Indian courts and tax authorities towards the PE concept under DTAA. This decision reinforces the stringent approach of Indian courts and tax authorities on the **PE concept under DTAA**, particularly:

- The ruling highlights that mere absence of formal lease or exclusive office space does not negate PE, so long as there is effective control and business activity conducted through the premises.
- It stresses that strategic oversight and managerial functions, when coupled with continuous and substantive involvement, can amount to a PE.
- The case draws heavily on the Formula One test emphasizing 'disposal' and 'business carried on' as core elements, showcasing the importance of economic substance over legal form.
- The Court's reliance on OECD and UN Model Convention commentaries reaffirms India's alignment with international tax norms.
- For foreign companies, especially those rendering management, consultancy, or technical services, this ruling serves as a cautionary note on potential PE exposure in India.
- From a practical perspective, foreign enterprises must carefully structure contracts and operational modalities to mitigate PE risks, keeping in mind that long-term control and operational involvement may trigger tax liability in India.

Upcoming Events

GST in Action: A Practical Perspective

14 November 2025

Nexdigm | Prabhat Ranjan



From the Judiciary

Direct Tax

Whether a Foreign Portfolio Investor can simultaneously claim capital gains exemption under the India–Mauritius DTAA for grandfathered shares and carry forward long-term capital losses on non-grandfathered shares under the Income tax Act?

Atyant Capital India Fund - I [TS-1136-ITAT-2025(Mum)]

Facts

The assessee is a Foreign Portfolio Investor (FPI) and a tax resident of Mauritius. For the relevant Assessment Year 2022–23, the assessee filed its return of income, claiming a carry forward of long-term capital loss. During the year, the assessee also earned long-term capital gains from the sale of listed equity shares that were acquired prior to 1 April 2017 (referred to as grandfathered shares). Relying on Article 13(4) of the India–Mauritius DTAA, the assessee claimed such capital gains as exempt from tax in India. The Revenue accepted this claim of exemption under the DTAA.

In the same year, the assessee incurred long-term capital losses from the sale of listed shares acquired after 1 April 2017 (i.e. non-grandfathered transactions). The assessee claimed the carry forward of these losses under Section 74 of the Income-tax Act, 1961 (ITA). In the intimation issued by the CPC, it disallowed the assessee's claim to carry forward the long-term capital loss and, additionally, adjusted the dividend income declared under the head 'Income from Other Sources' against the capital loss, effectively nullifying both items.

Aggrieved, the assessee appealed to the CIT(A), arguing that the CPC lacked jurisdiction under Section 143(1) to disallow the claim, especially since capital gains exemption under the DTAA was accepted and the capital loss was from a different transaction category. However, the CIT(A) upheld the CPC's action, stating the assessee cannot selectively apply the DTAA to exempt gains while using the ITA to carry forward losses from the same income stream. This selective approach was deemed incorrect and inconsistent, falling within the scope of adjustments

allowed under Section 143(1). The CIT(A) emphasized that the choice between the Act and the Treaty must be applied consistently for the entire income stream, not selectively.

Held

The ITAT held in favour of the assessee, observing that the assessee had correctly applied the provisions of the India–Mauritius DTAA and the ITA in respect of two distinct and independent sources of income. It was noted that the assessee claimed exemption under Article 13(4) of the DTAA for capital gains arising from the grandfathered transactions and separately claimed a carry forward of long-term capital loss under Section 74 of the Act for non-grandfathered transactions. The ITAT rejected the CIT(A)'s view that the DTAA or Act must be applied uniformly to the entire stream of income, holding instead that each capital transaction constitutes a separate source of income. Therefore, the assessee was entitled to claim benefit of the DTAA in respect of exempt gains from grandfathered transactions and simultaneously claim carry forward of loss under the Act for taxable post-2017 transactions.

Further, the Tribunal clarified a fundamental principle of international tax law that tax treaties do not themselves levy taxes but only provide relief where taxability arises under domestic law. In this case, while Article 13(4) of the DTAA allocated taxing rights for pre-2017 shares to Mauritius (resulting in exemption in India), Article 13(3A) applied to post-2017 shares, giving India taxing rights. Since the sale of such post-2017 shares resulted in a long-term capital loss, the assessee rightfully claimed carry forward of the same under Section 74 of the Act. The Tribunal also held that dividend income declared under the head 'Income from Other Sources' could not be adjusted against capital losses, as such adjustment is not permissible under the law. Accordingly, the AO was directed to allow the carry forward of long-term capital loss of INR 17,96,11,994 to subsequent years.

Our Comments

The case underscores that tax treaties and Indian tax law apply independently to different capital gains transactions, ensuring consistent and fair tax treatment. It reinforces the fact that treaties allocate taxing rights but do not themselves impose taxes.

Whether a Foreign Tax Credit claim can be denied solely on the grounds of delayed filing of Form 67 and procedural deficiencies, even when the assessee has filed a valid revised return, paid the foreign taxes, and furnished supporting documents?

Krishna Dalal [TS-1204-ITAT-2025(Bang)]

Facts

The assessee, an individual, originally filed his income tax return for the Assessment Year 2018-19 on 31 August 2018, declaring a total income of INR 3,12,400 comprising long-term capital gains and bank interest. Subsequently, he discovered that foreign income in the nature of bank interest amounting to INR 10,23,166 and dividend income of INR 1,54,460 earned from the USA had been inadvertently omitted. To rectify this, he filed a revised return on 30 January 2019, including the foreign income and claiming Foreign Tax Credit (FTC) of INR 1,85,150/- for taxes paid in the USA. Prior to filing the revised return, he also submitted Form 67 on 24 January 2019 as prescribed under Rule 128 of the Income Tax Rules.

The revised return was processed under Section 143(1) of the ITA, and the claim for FTC was disallowed without providing any reasons or prior intimation. A rectification application filed under Section 154 was also rejected. On appeal, the CIT(A) upheld the disallowance, citing failure to file supporting documents required under Rule 128(8) (ii), and noted that Form 67 was not submitted within the due date of filing the original return under Section 139(1). Aggrieved by this, the assessee filed the present appeal, contending that there was substantial compliance with the law, that Form 67 was filed prior to the revised return, and that the denial of FTC on technical grounds without giving an opportunity to be heard violated the principles of natural justice.

Held

The Tribunal reviewed submissions and evidence, including the assessee's paper book, which showed foreign tax paid in the USA and a revised return claiming Foreign Tax Credit (FTC) of INR 1,85,150. It noted that Form 67 was submitted before the revised return, fulfilling procedural requirements. The lower authorities had denied FTC due to lack of documentation, but the Tribunal found valid proof, such as the US Tax Return and payment voucher. Emphasizing substance over procedure, the Tribunal ruled that FTC should not be denied for technical lapses, especially when

proper documents were later provided, and referred to legal precedents treating the Form 67 deadline as directory, not mandatory.

Accordingly, the Tribunal held that the assessee was entitled to claim the FTC of INR 1,85,150 as per law. It directed the Assessing Officer to verify the documents submitted (Federal Tax Payment Voucher and US Tax Return) and to allow the FTC claim upon satisfaction. As a result, the assessee's appeal was allowed, subject to this verification. The order was pronounced on 26 August 2025.

Our Comments

This ruling highlights the importance of substantial compliance over mere procedural technicalities in claiming Foreign Tax Credit. It reinforces that genuine payment of foreign taxes and timely furnishing of relevant documents, even if delayed, should not deprive an assessee of the credit. The decision also underscores the need to uphold principles of natural justice by providing opportunity before denying such substantive benefits.

Quotes & Coverage

Global Sourcing and Singapore's Electronics Industry: From Cost to Resilience

ET Manufacturing | Arjit Agarwal

24 September 2025

<https://tinyurl.com/ypasdt7u>

New IBC rules to force quick settlements, block tactical delays by promoters

LiveMint | Subodh Dandawate

18 September 2025

<https://tinyurl.com/4a74atse>

Who Wins Big In The India-UK Trade Pact - BW Businessworld

Business World | Prabhat Ranjan

16 September 2025

<https://tinyurl.com/mpz7bsf6>

Global Capability Centres Trends: Strategic Progression & Workforce Management

GCC Rise | Alpana Shirgaonkar

5 September 2025

<https://tinyurl.com/bd99bnr9>

Will GST rate cut on insurance lead to a re-rating of sector stocks?

Fortune India | Prabhat Ranjan

5 September 2025

<https://tinyurl.com/3uznmsfu>



Indirect Tax

Whether refund of unutilized Input Tax Credit (ITC) is eligible upon discontinuation or closure of business?

SICPA India Pvt. Ltd. vs. Union of India [(2025) 34 Centax 200 (Sikkim)]

Facts

- In June 2025, the Single Judge Bench of Sikkim HC had allowed the petitioner to claim refund of accumulated unutilized ITC upon closure of business.
- The judgment was founded on the following key considerations:
 - Section 49(6), when read with Section 54 of the CGST Act, 2017, contains no express bar on refund of credit in cases of business closure.
 - Under Article 265 of the Constitution, no tax can be retained without legal authority; withholding ITC in such circumstances would amount to unauthorized retention of property.
 - Reliance was placed on Karnataka HC ruling in the case of Union of India vs. Slovak India Trading Co. Pvt. Ltd. [(2006) 5 STT 332 (Karnataka)], which had delivered similar verdict in the context of Rule 5 of CENVAT Credit Rules, 2002.
- Assailing the said decision, Revenue filed an appeal before the Division Bench.

Ruling

- Disagreeing with the view of the Single Judge Bench, the Division Bench observed that the same was contrary to the opinion of Supreme Court in Union of India vs. VKC Footsteps India (P) Ltd. [2021 (52) GSTL 513 (SC)].
- In the said judgement, the Apex Court had clarified inter alia that while recognizing an entitlement to refund, it is open to the legislature to define the circumstances in which a refund can be claimed.
- The Bench emphasized that Section 49(6) does not create an independent right to refund but merely provides that the balance in the electronic credit ledger may be refunded in accordance with Section 54 and in no other manner.
- Since Section 54(3) envisages only two scenarios, viz. zero-rated supplies without payment of tax and inverted duty structure, the opinion of Single Judge Bench would involve a judicial re-writing of the provision, which is impermissible in law.
- In fact, Section 54(3) is a restriction on refund on account of closure of business as it does not fall in either of its two clauses, held the Court.
- Accordingly, the Bench observed that the impugned opinion deviated from the well-established principles of

statutory interpretation of taxing statutes and ventured into the legislative domain of the Parliament. '*Perceived hardship or inequality cannot permit interpreting taxing statute beyond well-settled parameters laid down by the Hon'ble Supreme Court*,' it remarked.

- Given this, it held that the rejection of refund application vis-à-vis closure of business was within the parameters of Section 54 and therefore lawful. In such view of the matter, it could not have been held (by the Single Judge Bench) that the Revenue was retaining tax without the authority of law.
- Moreover, it found considerable force in the submission of Revenue that the accumulated ITC must be reversed under Section 29(5) of the CGST Act, 2017. However, it did not delve further into this issue as it would involve fact finding that was beyond the pleadings before the Bench.

Our Comments

This ruling reaffirms the Supreme Court's binding interpretation in VKC Footsteps India (P) Ltd.

The Division Bench has applied this precedent to emphasize that a taxing statute must be interpreted based solely on its clear and unambiguous language, and that judicial expansion of refund eligibility would amount to impermissible judicial legislation.

However, a broader and more purposive reading of the GST framework particularly in light of constitutional principles presents an alternative view.

Moreover, Section 29(5), which governs cancellation of registration, mandates reversal of ITC on inputs, semi-finished goods, finished goods, and capital goods held in stock, but remains silent on the treatment of any residual ITC balance remaining in the electronic credit ledger after such reversal. The provision does not expressly provide for the lapse or extinguishment of this surplus balance.

This legislative vacuum creates uncertainty. Once the statutory reversals are completed, there is no clarity on the fate of the unutilized ITC that represents tax already paid but not passed through the value chain. Retaining such amounts in the absence of an express provision for lapsing of credit can arguably be said to contravene Article 265 of the Constitution, which forbids retention of tax without lawful authority.

Transfer Pricing

Assessment order stands vitiated due to procedural lapse – Draft order not issued

Zuari Cement Limited. [ITA no 927 / HYD / 2025] for Assessment Year (AY) 2010-11

Facts

The assessee is engaged in the business of manufacturing and selling cement. For AY 2010-11, the assessee filed its income tax return, and the assessment was completed by the Ld. AO by making an addition in the total income of the assessee. Pursuant to the directions of the Dispute Resolution Panel (DRP), the Ld. AO issued the final AO order.

Aggrieved by the final AO order, the assessee filed an appeal before the ITAT. The ITAT set aside the Ld. AO's order and remanded the case back to the file of the Ld. Transfer Pricing Officer (TPO) and Ld. AO for fresh consideration.

Following the remand, the Ld. AO relooked into the facts of case and passed the final assessment order. Aggrieved with the Ld. AO's final order, the assessee filed an appeal before the Ld. Commissioner of Income Tax (Appeals) ('CIT(A)'), who ruled in favor of the assessee.

Aggrieved by the appeal the Revenue filed an appeal before the ITAT in the second round of proceeding.

Assessee contention before the Hon'ble ITAT

The assessee contended that during the first round of proceedings, the Ld. AO issued a draft assessment order in accordance with Section 144C(1) of the ITA. This section mandates that the AO shall issue a draft order to the assessee whenever any variation is proposed in the income or loss declared, which adversely affects the assessee. Subsequently, following the directions of the DRP, the Ld. AO passed the final assessment order.

However, in the second round of proceedings, the Ld. AO passed the final assessment order without issuing a draft order, thereby violating the provisions of Section 144C(1) of the Act. The assessee stated that the requirements of Section 144C(1) of the Act are applicable even when the case is remanded back for fresh consideration. The assessee placed its reliance on judicial precedent by the High Court (HC) in its own case.

Held by the ITAT

The ITAT observed that during the first round of proceedings, the Ld. AO issued the final assessment order in accordance with the DRP's directions, following the issuance of a draft assessment order under Section 144C(1). However, in the second round of proceedings, the Ld. AO directly passed the final assessment order without issuing a draft order.

Relying on Section 144C(1) of the Act and the judicial precedent by the Hon'ble HC in the assessee's own case, the ITAT noted that Section 144C(1) clearly states that the Ld. AO is required to issue draft order to the assessee before making any variation in income that is prejudicial to its interest.

Considering these facts, the Hon'ble ITAT upheld the Ld. CIT(A)'s decision which in favor of the assessee, holding the impugned order to be invalid.

Our Comments

It is pertinent to note that the language of the Section 144C(1) of the Act is clear that where the Ld. AO proposes to make any variations in the income of the eligible assessee, which is prejudicial to its interest, the AE 'shall' first forward the draft assessment order to the assessee. The word 'shall' makes the provisions mandatory and non-negotiable.

It is imperative for the assessee to carefully examine the procedural compliance of any order issued by the tax authorities - such as whether a draft assessment order was properly issued, whether the Document Identification Number (DIN) is correctly mentioned, and whether other mandatory procedural requirements have been fulfilled. Even if the assessment is legally and factually correct on merits, any lapse in following the prescribed procedure may render the entire order invalid in the eyes of law. Therefore, attention to procedural details is as critical as challenging the substantive aspects of the assessment.

Quotes & Coverage

GST 2.0: Major Tax Cuts On Farm Equipment, Fertilisers And Dairy To Empower Farmers in Business World

Business World | Prabhat Ranjan

5 September 2025

<https://tinyurl.com/ym7kc4m5>

GST 2.0: A Game-Changing Reform Reshaping India's Business Landscape

The Hindu Business Line | Prabhat Ranjan

5 September 2025

<https://tinyurl.com/mzvtbyde>

GST reforms a bold and timely step to ease pressure on export chains: GJEPC

Jewelbuzz | Prabhat Ranjan

4 September 2025

<https://tinyurl.com/2mcdw3pf>



Tax Talk

Indian Developments

Direct Tax

Section 246 of the Income-tax Act, 1961 – Scope of e-Appeals Scheme 2023 (Amendment to Appealable Orders Before Joint Commissioner (Appeals))

ORDER F. NO. 279/MISC./M-53/2025-ITJ Dated – 17 September 2025

The Central Board of Direct Taxes (CBDT), vide F.No. 370149/97/2023-TPL, has amended its earlier order dated 16 June 2023 to specify the revised scope of e-Appeals before the Joint Commissioner.

Earlier, appeals against orders passed under Sections 143(3) or 144 before 13 August 2020 with disputed demand exceeding INR 1 million were exempted from the e-Appeals Scheme.

As per the revised order, the exemption now applies to appeals filed before 1 October 2020 against such orders with disputed demand exceeding INR 2.5 million.

This amendment is effective from 17 May 2025.

Waiver of Interest Payable u/s 220(2)

Circular NO. 13/2025 [F. NO. 275/09/2025-IT(BUDGET)] Dated – 19 September 2025

In some cases, it was observed by the CBDT that taxpayers were incorrectly granted rebate under Section 87A on incomes chargeable to special tax rates (e.g LTCG u/s 112A) under Chapter XII while opting new regime under Section 115BAC(1A). Subsequent rectifications by department to disallow such rebates resulted in demands being raised. Further any delay in paying these demands attracts interest under Section 220(2). To reduce genuine hardship, the CBDT has directed that such interest will be waived if the demand raised through rectification is paid on or before 31 December 2025. However, if payment is delayed, interest will apply from the expiry of the time allowed u/s 220(1).

Indirect Tax

Customs

Inclusion of defense and aerospace equipment under concessional duty regime

Notification No. 37/2025-Customs Dated 17 September 2025

The Ministry of Finance has expanded customs duty exemption on a wide range of defense-related imports, which include military aircraft, unmanned underwater vessels, etc., w.e.f. 22 September 2025 and will remain valid up to and inclusive of 1 July 2029.

IGST exemption on import of works of art and antiques

Notification No. 38/2025-Customs Dated 17 September 2025

In addition to basic customs duty exemption, the Ministry of Finance has granted exemption from integrated tax (IGST) on the import of works of art and antiques w.e.f. 22 September 2025. The said exemption shall be subject to certain conditions specified in Notification No. 29/2025-Customs (Tariff) issued on 9 May 2025.

Government revises IGST rate on specified goods required for petroleum operations

Notification No. 39/2025-Customs (Tariff) Dated 17 September 2025

The Ministry of Finance has revised the IGST rate from 5% to 18% on the goods used for petroleum exploration operations specified under List 33 of Notification No. 50/2017-Customs dated 30 June 2017. The change is effective from 22 September 2025

Government notifies first tranche of customs duty concessions on imports from Switzerland, Norway, and Iceland under India-EFTA Trade Deal

Notification Nos. 41, 42 and 43/2025-Customs Dated 30 September 2025

The Finance Ministry has provided tariff concessions on over 10,000 specified goods imported from Switzerland, Norway, and Iceland, effective 1 October 2025. The relief covers BCD rates, AIDC rates, and Health cess rates, which can be availed only upon fulfilling certain conditions, including proof of origin under the India-EFTA Trade and Economic Partnership Agreement. The move aims to boost trade, reduce import costs, and strengthen economic cooperation with these countries.

Further, vide Notification 59/2025-Customs (NT) dated 29 September 2025, the Customs Tariff (Determination of Origin of Goods under the Trade and Economic Partnership Agreement between India and the EFTA States) Rules, 2025 have been notified effective 1 October 2025.

Communication to taxpayers through e-Office - requirement of DIN

Circular No. 23/2025-Customs Dated 23 September 2025

The Central Board of Indirect Taxes and Customs (CBIC) has streamlined the verification of official communications with taxpayers wherein communications sent via CBIC's e-Office "public option" will now carry a unique "Issue number" that can be verified online at <https://verifydocument.cbic.gov.in>, thereby eliminating the need for a separate DIN.

The system confirms details such as file number, issue date, type of communication, issuing office, and masked recipient information. For other communications outside this system, quoting of DIN remains mandatory.

SEZ

Government extends APR filing due date for FY 2024-25; aligns with Income Tax and GST returns timelines

Communication No. K-43022/83/2025-SEZ Dated 29 September 2025

The Ministry of Commerce & Industry, with the approval of Competent Authority has extended the due date for filing of Annual Performance Report (APR) for SEZ units for FY 2024-25, from 30 September 2025 to 31 December 2025.

This move is aimed at promoting ease of doing business, facilitating regulatory compliance and enabling submission of APRs based on finalized returns (as against provisional figures presently being submitted).

Foreign Trade Policy

RoDTEP scheme extended till 31 March 2026 for exports from DTA, AA, SEZ, and EOU

Notification No. 35/2025 Dated 30 September 2025

The Government has extended RoDTEP Scheme until 31 March 2026 for exports made from Domestic Tariff Area (DTA) units, Advance Authorisation (AA) holders, Special Economic Zone (SEZ) units, and Export Oriented Units (EOUs). The existing RoDTEP rates and per-unit value caps remain unchanged, and the scheme will continue to operate within the current budgetary framework.

Government restricts import of certain Jewelry articles till 31 March 2026

Notification No. 34/2025 dated 24 September 2025

The import of jewelry items covered under below ITC (HS) Codes now require specific authorization or licensing until 31 March 2026.

Sl. No.	ITC (HS) Code	Description Policy	Existing Import Policy	Revised Import Policy
1	71131141	Other Jewelry: Unstudded	Free	Restricted
2	71131149	Other Jewelry: Other	Free	Restricted

The Directorate General of Foreign Trade (DGFT) updates Handbook of Procedures 2023 to facilitate DFIA corrections

Public Notice No. 22/2025 Dated 09 September 2025

Para 4.53(e) has been inserted in the Handbook of Procedures, 2023, which permits systemic and corrective amendments to unutilized and untransferred Duty-Free Import Authorizations (DFIAs). The key features include:

- Amendments must be system-related and corrective in nature;
- Applications should be submitted through ANF-4G and would require approval of Head of Office;
- Permissible changes include corrections to the unit of measurement (UOM), ITC (HS) code of import item, or the value of the import item, etc.

Tax Talk

Global Developments

Indirect Tax

Brazil advances Indirect Tax Reform with dual VAT system under Complementary Law 214/2025

Excerpts from various sources

The indirect tax reform initiated earlier this year through Complementary Law 214/2025 has been extended to consolidate multiple federal, state, and municipal taxes into a dual Value-Added Tax (VAT) system, introducing two new taxes:

- The Contribution on Goods and Services (CBS) at the federal level, and
- The Goods and Services Tax (IBS) at the state and municipal levels

The reform is designed to simplify compliance, reduce tax distortions, and create a more predictable tax environment. The transition to this new system is scheduled to begin in January 2026, with full implementation expected by 2033.

Sri Lanka delays implementation of VAT Rules for non-resident Digital Service Providers

Excerpts from various sources

In July 2025, the Inland Revenue Department (IRD) issued Gazette Notification No. 2443/30 mandating the non-resident persons supplying services via electronic platforms to consumers in Sri Lanka to register for Value Added Tax (VAT), charge 18% VAT on applicable services, and remit the tax to the IRD. However, the implementation of VAT on such cross-border provision of digital services has been postponed to 1 April 2026, which was originally scheduled to take effect from 1 October 2025.

Transfer Pricing

Amendments to Transfer Pricing Regulations – Mauritius

The Income Tax Act introduced in 1995 in Mauritius talks about the application of arm's length test and empowers the Mauritius Revenue Authority (MRA) to adjust the taxable income of a taxpayer if its related-party transactions are not considered to be at arm's length.

Mauritius government via the Finance Act 2025 (FA 2025), gazetted on 9 August 2025 provides for changes/ amendments in Transfer Pricing Regulations as detailed in Section 75 of the ITA which are as summarized below:

- Mandatory maintenance of Transfer Pricing Documentation (TPD)
- Introduction of definitions of "Connected Person" and "Transaction"

The aforementioned amendments were introduced with an intention to bring the Mauritius TP regulations in line with the guidelines issued by the Organization for Economic Co-operation and Development (OECD).

Amendments as per The Income Tax Act

Maintenance of TPD

Under the existing regulations as detailed in the ITA under Section 75, there was no obligation to maintain any TPD for application of arm's length test by the taxpayer in Mauritius wherein a taxpayer engaged in transaction between connected persons.

However, pursuant to the latest amendment, introduced by the FA 2025, the new subsection (2A) under Section 75 mandates that a taxpayer which engages in a transaction between connected persons and falls under the purview of application of arm's length test shall prepare and keep records in such manner as may be prescribed.

Mauritius had implemented Country-by-Country Reporting (CbCR) requirements from FYs starting 1 July 2018. With

the introduction of master file and local file requirements in Mauritius, three-tier documentation would be implemented in Mauritius, aligning with the OECD guidelines. The detailed guidance (including documentation timing and format) is expected to be introduced by way of issuance of separate guidelines in due course.

The regulations are expected to provide detailed guidance as to the form, content, and details of the documentation required to be kept by taxpayers with introduction of practical thresholds which shall define applicability of the newly introduced provisions.

Definitions

The latest amendment has also introduced two essential definitions to provide more clarification on the aspect of transactions between related parties under TP regulations prevalent in Mauritius. The FA 2025 defines the following:

- **Connected persons:** Means any two (2) or more persons, where one controls the business or income earning activity of the other, in Mauritius or from Mauritius.
- **Transaction:** Any transaction or series of transactions, carried out directly or indirectly, between connected persons regardless of whether these transactions are legally binding or intended to be enforced through legal action; and includes cross-border transactions

Our Comments

With the introduction of mandatory TPD requirements under the Transfer Pricing Regulations in Mauritius, the scrutiny of related party transactions would be on the rise by the MRA. To conclude, the impact of these amendments will lead to:

- The new documentation requirements which are expected to align with OECD standards, including the Master File and Local File framework.

Businesses would require maintaining robust and contemporaneous TPD which shall also serve as a defense mechanism and reduce the risk of disputes with MRA

Alerts

Enhancing Certainty, Transparency and Uniformity in Permanent Establishment and Profit Attribution for Foreign Investors in India

10 October 2025

<https://tinyurl.com/sxhbkfcp>

Key Highlights of GST Notification and Clarification Circulars in September 2025

8 October 2025

<https://tinyurl.com/2ndmkkec>

IASB announcement on adoption of international standards in MENA region

6 October 2025

<https://tinyurl.com/kkec5wr5>

Ministerial Decision No. 243 and 244 of 2025 – Electronic Invoicing System Implementation Framework

1 October 2025

<https://tinyurl.com/2s3c5625>

Amendments in Executive Regulations of Federal Decree Law on Account E-Invoicing

26 September 2025

<https://tinyurl.com/5brhjbtt>

Mandatory e-filing of appeals & staggered timelines for dealing with backlog of appeals

26 September 2025

<https://tinyurl.com/4zd6nvk2>

MCA extends the conducting of general meetings through audio-visual means

22 September 2025

<https://tinyurl.com/ysfvun36>

Government relaxes revised MRP affixation condition; waives advertisement requirement

19 August 2025

<https://tinyurl.com/3hteabdr>



Quotes & Coverage

Shifting GST Rates: What Business Leaders Say About the Road Ahead in CXO Today

CXO Today | Prabhat Ranjan

4 September 2025

<https://tinyurl.com/5b3pry5d>

Travelling after GST 2.0: Tax hike hits premium flights, will rail passengers pay more too?

Times Of India | Prabhat Ranjan

4 September 2025

<https://tinyurl.com/mr2yew3j>

GST reforms 2025: A catalyst for economic transformation in Manufacturing Today

Manufacturing Today | Prabhat Ranjan

4 September 2025

<https://tinyurl.com/bdeefzf2>

GST impact: Like premium air travel tickets, will premium railway tickets cost more after GST 2.0?

Economic Times | Prabhat Ranjan

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<https://tinyurl.com/d9zvm9x7>

GST rate revision receives Industry backing, seen as boost for consumers and businesses

Adgully | Prabhat Ranjan

4 September 2025

<https://tinyurl.com/3pjshksc>

GST Council Meet Expectation: Toothpaste, AC, Washing Machine, TV, To Your New House, What Can Get Cheaper?

Good Returns | Prabhat Ranjan

2 September 2025

<https://tinyurl.com/mw9mkw7p>

Upcoming GST reforms will ensure open, transparent economy: FM Sitharaman ahead of GST council meet

Business Today | Prabhat Ranjan

2 September 2025

<https://tinyurl.com/ywdba63k>



Compliance Calendar

- Direct Tax
- Indirect Tax

7 October 2025

- Securities Transaction Tax - Due date for deposit of tax collected for the month of September, 2025
- Commodities Transaction Tax - Due date for deposit of tax collected for the month of September, 2025
- Declaration under sub-section (1A) of section 206C of the Income-tax Act, 1961 to be made by a buyer for obtaining goods without collection of tax for declarations received in the month of September 2025 in Form 27C
- Due date for deposit of tax deducted/collected for the month of September 2025. However, all sum deducted/collected by an office of the government shall be paid to the credit of the Central Government on the same day where tax is paid without production of an Income tax Challan
- Due date for deposit of TDS for the period July 2025 to September 2025 when Assessing Officer has permitted quarterly deposit of TDS under Section 192, 194A, 194D, or 194H

15 October 2025

- Due date for furnishing of Form 24G by an office of the Government where TDS/TCS for the month of September, 2025
- Due date for issue of TDS Certificate for tax deducted under Section 194-IB in the month of August, 2025 in Form 16B
- Due date for issue of TDS Certificate for tax deducted under Section 194-IA in the month of August, 2025 in Form 16C
- Due date for issue of TDS Certificate for tax deducted under Section 194M in the month of August, 2025 in Form 16D
- Due date for issue of TDS Certificate for tax deducted under Section 194S in the month of August 2025 in Form 16E
- Quarterly statement in respect of foreign remittances (to be furnished by authorized dealers) in Form No. 15CC for quarter ending September, 2025
- Quarterly statement of TCS deposited for the quarter ending September 30, 2025 in Form 27EQ

10 October 2025

- GSTR-7 for the month of September 2025 to be filed by persons liable to Tax Deduction at Source (TDS)
- GSTR-8 for the month of September 2025 to be filed by E-Commerce Operators liable to Tax Collection at Source (TCS)

11 October 2025

- GSTR-1 for the month of September 2025 to be filed by all registered taxpayers not under QRMP scheme

13 October 2025

- GSTR-6 for the month of September 2025 to be filed by Input Service Distributors (ISDs)
- Uploading B2B invoices using Invoice Furnishing Facility (IFF) under QRMP scheme for the month of September 2025 by taxpayers with aggregate turnover of up to INR 50 million
- GSTR-5 for the month of September 2025 to be filed by Non-Resident Foreign Taxpayers
- GSTR-1 for the quarter of July 2025 to September 2025 to be filed by taxpayers under QRMP scheme

- Upload declarations received from recipients in Form No. 15G/15H during the quarter ending September, 2025
- Monthly statement to be furnished by a stock exchange in respect of transactions in which client codes been modified after registering in the system for the month of September, 2025 in Form 3BB
- Monthly statement to be furnished by a recognized association in respect of transactions in which client codes have been modified after registering in the system for the month of September, 2025 in Form 3BC
- Quarterly statement to be furnished by a unit of an International Financial Services Centre, as referred to in subsection (1A) of section 80LA, in respect of remittances, made for the quarter of July to September of 2025-26 (Financial Year) in Form 15CD
- Quarterly statement to be furnished by specified fund or stock broker in respect of a non-resident referred to in rule 114AAB in respect of the quarter ending 30 September 2025

Compliance Calendar

- Direct Tax
- Indirect Tax

20 October 2025

- GSTR-5A for the month of September 2025 to be filed by non-resident Online Database Access and Retrieval (OIDAR) service providers
- GSTR-3B for the month of September 2025 to be filed by all registered taxpayers not under QRMP scheme

25 October 2025

- Payment of tax through GST PMT-06 by taxpayers under QRMP scheme for the month of September 2025
- ITC-04 for the period April 2025 to September 2025 to be filed by taxpayers sending goods for job work

31 October 2025

- Report from an accountant to be furnished under sub-section (2AB) of Section 35 of the Act relating to in-house scientific research and development facility (if due date of submission of return of income is 31 October 2025) in Form 3CLA
- Quarterly statement of TDS deposited for the quarter ending 30 September 2025 in Form 24Q/26Q/27Q
- Due date for furnishing of Annual audited accounts for each approved programs under Section 35(2AA)
- Quarterly return of non-deduction of tax at source by a banking company from interest on time deposit in respect of the quarter ending 30 September 2025 in Form 26QAA
- Due date for e-filing of a declaration in Form No. 61 containing particulars of Form No. 60 received during the period 1 April 2025 to 30 September 2025 to the concerned Director/Joint Director
- Due date for filing of return of income for the AY 2025-26 if the assessee (not having any international or specified domestic transaction) is (a) corporate assessee or (b) non corporate assessee (whose books of account are required to be audited) or (c) partner of a firm whose accounts are required to be audited) or the spouse of such partner if the provisions of section 5A applies to such spouse
- Audit report under Section 44AB for the Assessment Year 2025-26 in the case of an assessee who is also required to submit a report pertaining to international or specified domestic transactions under Section 92E in Form 3CA_CD and in Form 3CB_CD

22 October 2025

- GSTR-3B for the quarter of July 2025 to September 2025 to be filed by taxpayers under QRMP scheme and having principal place of business in Category 1 States

24 October 2025

- GSTR-3B for the quarter of July 2025 to September 2025 to be filed by taxpayers under QRMP scheme and having principal place of business in Category 2 States

30 October 2025

- Quarterly TCS certificate in respect of tax collected by any person for the quarter ending 30 September 2025 in Form 27D
 - Due date for furnishing of challan-cum-statement in respect of tax deducted under Section 194-IA in the month of September 2025 in Form 26QB
 - Due date for furnishing of challan-cum-statement in respect of tax deducted under Section 194-IB in the month of September 2025 in Form 26QC
 - Due date for furnishing of challan cum statement in respect of tax deducted under Section 194M in the month of September 2025 in Form 26QD
 - Due date for furnishing of challan cum statement in respect of tax deducted under Section 194S in the month of September 2025 in Form 26QE
-
- Report to be furnished in Form 3CEB in respect of international transaction and specified domestic transaction
 - Intimation by Pension Fund of investment under clause (23FE) of Section 10 of the Income-tax Act, 1961 for the quarter ending 30 September 2025, in Form 10BBB
 - Intimation by Sovereign Wealth Fund of investment under clause (23FE) of Section 10 of the Income-tax Act, 1961 for the quarter ending 30 September 2025, in Form II SWF
 - Payment of Self Assessment Tax (if due date of submission of return of income is 31 October 2025)
 - Audit report under clause (ii) of Section 115VV of the Income-tax Act, 1961 (if due date of submission of return of income is 30 November 2025) in Form 66

Compliance Calendar

● Direct Tax
● Indirect Tax

31 October 2025

- Audit report under clause (b) of the tenth proviso to clause (23C) of Section 10 and sub-clause (ii) of clause (b) of sub-section (1) of Section 12A of the Income-tax Act, 1961, in the case of a fund or trust or institution or any university or other educational institution or any hospital or other medical institution. (if due date of submission of return of income is 30 November 2025) in Form 10B
- Statement by scientific research association, university, college or other association or Indian scientific research company as required by rules 5D, 5E and 5F (if due date of submission of return of income is 31 October 2025)
- Intimation by a designated constituent entity, of an international group in Form No. 3CEAB for the accounting year 2024-25
- Certificate from the principal officer of the amalgamated company and duly verified by an accountant regarding achievement of the prescribed level of production and continuance of such level of production in subsequent years. (if due date of submission of return of income is 30 November 2025) in Form 62
- Audit report under (sub-rule (12) of rule 17CA) of the Income-tax Rules, 1962, in the case of an electoral trust (if due date of submission of return of income is 31 October 2025) in Form 10BC
- Application for exercise of option under sub-section (4) of Section 115BA of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 10-IB
- Application for exercise of option under sub-section (7) of Section 115BAB of the Income-tax Act, 1961 in Form 10-ID
- Annual Statement of Exempt Income under sub-rule (2) of rule 21AJA and taxable income under sub-rule (2) of rule 21AJAA (if due date of submission of return of income is 31 October 2025) in Form 10-IK
- Report from an accountant to be furnished for purpose of Section 9A regarding fulfilment of certain conditions by an eligible investment fund in Form 3CEJA
- Application for exercise of option under sub-section (5) of Section 115BAA of the Income - tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 10-IC

31 October 2025

- Certificate under sub-section (3) of Section 80QQB for authors of certain books in receipt of royalty income, etc. (if due date of submission of return of income is 31 October 2025) in Form 10CCD
- Certificate under sub-section (2) of Section 80RRB for Patentees in receipt of royalty income, etc. (if due date of submission of return of income is 31 October 2025) in Form 10CCE
- Report under section 80LA (3) of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 10CCF
- Taxation of income from retirement benefit account maintained in a notified country (if due date of submission of return of income is 31 October 2025) in Form 10-EE
- Certificate of foreign inward remittance (if due date of submission of return of income is 31 October 2025) in Form 10H
- Certificate of the medical authority for certifying person with disability, severe disability, autism, cerebral palsy and multiple disability for purposes of Section 80DD and Section 80U (if due date of submission of return of income is 31 October 2025) in Form 10IA
- Application for exercise of option under sub-section (5) of Section 115BAD of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 10-IF
- Statement of Exempt income under clause (4D) of section 10 of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 10IG
- Statement of income of a Specified fund eligible for concessional taxation under section 115AD of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 10IH
- Statement of exempt income under clause (23FF) of section 10 of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 10-II
- Form for opting for taxation of income by way of royalty in respect of Patent (if due date of submission of return of income is 31 October 2025) in Form 3CFA
- Income attributable to assets located in India under section 9 of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 3CT

Compliance Calendar

● Direct Tax
● Indirect Tax

31 October 2025

- Particulars to be furnished under clause (b) of sub-section (1B) of section 10A read with clause (b) of sub-section (2) of Section 10AA of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 56FF
- Details of amount attributed to capital asset remaining with the specified entity (if due date of submission of return of income is 31 October 2025)) in Form 5C
- Declaration to be filed by the assessee claiming deduction under Section 80GG (if due date of submission of return of income is 31 October 2025) in Form 10BA
- Form for furnishing particulars of income under Section 192(2A) for claiming relief u/s 89 (if due date of submission of return of income is 31 October 2025) in Form 10E
- Statement of eligible investment received in Form 10BBD
- Quarterly statement of tax deposited in relation to transfer of virtual digital asset under Section 194S to be furnished by an exchange for the quarter ending 30 September 2025, in Form 26QF
- Authorization for claiming deduction in respect of any payment made to any financial institution located in a Notified jurisdictional area. (if due date of submission of return of income is 31 October 2025) in Form 10FC
- Certificate of accountant in respect of compliance to the provisions of clause (23FE) of section 10 of the Income-tax Act, 1961 by the notified Pension Fund in Form 10BBC
- Application for Opting for Safe Harbor in respect of Specified Domestic Transactions (if the assessee is required to submit return of income on 31 October 2025) in Form 3CEFB
- Application for exercise of option under clause (i) of sub-section (6) of Section 115BAC or withdrawal of option under the proviso to sub-section (6) of Section 115BAC of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 10-IEA
- Application for exercise of option under sub-section (5) of Section 115BAE of the Income Tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 10-IFA
- Report under section 10AA of the Income -tax Act, 1961 (if due date of submission of return of income is 30 November 2025) in Form 56F

31 October 2025

- Audit report under clause (b) of the tenth proviso to clause (23C) of Section 10 and sub-clause (ii) of clause (b) of sub-section (1) of Section 12A of the Income-tax Act, 1961, in the case of a fund or trust or institution or any university or other educational institution or any hospital or other medical institution which is required to be furnished under clause (b) of the tenth proviso to clause (23C) of Section 10 or a trust or institution which is required to be furnished under sub-clause (ii) of clause (b) of section 12A (if due date of submission of return of income is 30 November 2025) in Form 10BB
- Audit report under Sections 80-I(7)/ 80-IA(7)/ 80-IB/ 80-IC/80-IAC/80-IE (if due date of submission of return of income is 30 November 2025) in Form 10CCB
- Report under Section 80JJAA of the Income-tax Act, 1961 (if due date of submission of return of income is 30 November 2025 in Form 10DA
- Certificate to be issued by accountant under clause (23FF) of Section 10 of the Income-tax Act, 1961 (if due date of submission of return of income is 30 November 2025) in Form 10-IJ
- Verification by an Accountant under sub-rule (3) of rule 21AJAVerification (if due date of submission of return of income is 30 November 2025) in Form 10-IL
- Report under Section 115JB of the Income-tax Act, 1961 for computing the book profits of the company (if due date of submission of return of income is 30 November 2025) in Form 29B
- Report under Section 115JC of the Income-tax Act, 1961 for computing Adjusted Total Income and Alternate Minimum Tax of the person other than a company (if due date of submission of return of income is 30 November 2025) in Form 29C
- Due date for filing audit report under Section 33AB(2) (if due date of submission of return of income is 30 November 2025) in Form 3AC
- Due date for filing audit report under Section 33ABA(2) (if due date of submission of return of income is 30 November 2025) in Form 3AD
- Audit Report under Section 35D(4)/35E(6) of the Income- tax Act, 1961 (if due date of submission of return of income is 30 November 2025) in Form 3AE

Compliance Calendar

- Direct Tax
- Indirect Tax

31 October 2025

- Statement regarding preliminary expenses incurred to be furnished under proviso to clause (a) of sub-section (2) of Section 35D of the Income-tax Act, 1961 by the assessee (if due date of submission of return of income is 30 November 2025) in Form 3AF
- Audit report under sub-section (2) of Section 44DA of the Income-tax Act, 1961 (if due date of submission of return of income is 30 November 2025) in Form 3CE
- Report of an accountant to be furnished by an assessee under sub-section (3) of Section 50B of the Income -tax Act, 1961 relating to computation of capital gains in case of slump sale (if due date of submission of return of income is 30 November 2025) in Form 3CEA
- Audit report to be filed by the Sovereign Wealth Fund claiming exemption under clause (23FE) of Section 10 of the Income -tax Act, 1961. (if due date of submission of return of income is 30 November 2025)
- Certificate of accountant in respect of compliance to the provisions of clause (23FE) of section 10 of the Income-tax Act, 1961 by the notified Pension Fund in Form 10BBC

13 November 2025

- GSTR-6 for the month of October 2025 to be filed by ISDs
- Uploading B2B invoices using IFF under QRMP scheme for the month of August 2025 by taxpayers with aggregate turnover of up to INR 50 million
- GSTR-5 for the month of October 2025 to be filed by Non-Resident Foreign Taxpayers

7 November 2025

- Securities Transaction Tax - Due date for deposit of tax collected for the month of October, 2025
- Commodities Transaction Tax - Due date for deposit of tax collected for the month of October, 2025
- Declaration under sub-section (1A) of Section 206C of the Income-tax Act, 1961 to be made by a buyer for obtaining goods without collection of tax for declarations received in the month of October, 2025 in Form 27C
- Due date for deposit of Tax deducted/collected for the month of October 2025. However, all sum deducted/collected by an office of the government shall be paid to the credit of the Central Government on the same day where tax is paid without production of an Income tax Challan

10 November 2025

- GSTR-7 for the month of October 2025 to be filed by persons liable to TDS
- GSTR-8 for the month of October 2025 to be filed by E-Commerce Operators liable to TCS

11 November 2025

- GSTR-1 for the month of October 2025 by all registered taxpayers not under QRMP scheme

Category 1 states - Chhattisgarh, Madhya Pradesh, Gujarat, Maharashtra, Karnataka, Goa, Kerala, Tamil Nadu, Telangana, Andhra Pradesh, the Union territories of Daman and Diu and Dadra and Nagar Haveli, Puducherry, Andaman and Nicobar Islands, or Lakshadweep.

Category 2 states - Himachal Pradesh, Punjab, Uttarakhand, Haryana, Rajasthan, Uttar Pradesh, Bihar, Sikkim, Arunachal Pradesh, Nagaland, Manipur, Mizoram, Tripura, Meghalaya, Assam, West Bengal, Jharkhand or Odisha, the Union territories of Jammu and Kashmir, Ladakh, Chandigarh, or Delhi.

Easy Remittance Tool

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Form 15CA/CB Automation



Review of tax position by experts



Issuance of bulk certificates through Automated tool



Repository - Access to entire set of documents



Access to Detailed transaction wise reports



Representation Support



Generation 15CA bulk files & utility to generate Form A2

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