

Tax Street

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

August 2025



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Tax Street

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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 August 2025.

- The '[Focus Point](#)' elaborates upon the sectors that are sure to benefit from the India–UK Trade Pact.
- 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

Sector Spotlight: Who Wins Big in the India–UK Trade Pact

The India–UK Comprehensive Economic and Trade Agreement (CETA) is more than just a trade pact, it is a game-changer for Indian exporters. With steep tariff cuts, improved market access, and facilitation in services and mobility, the deal is set to unlock targeted growth in high-potential sectors. Industries where every percentage point of duty can make or break a deal, from textiles and leather to engineering goods and processed foods, this deal could tilt the playing field in favor and stand to gain a competitive edge in the UK market. When exports rise because of a trade deal, two indirect-tax realities immediately follow. First, exporters will generate higher unutilized input tax credits (ITC) at the domestic stage and will rely more on IGST refunds and zero-rated procedures to recover that cash. Second, schemes such as Remission of Duties and Taxes on Exported Products (RoDTEP)/Rebate of State and Central Taxes and Levies (RoSCTL) become more valuable because they refund non-creditable duties and levies which directly improve exporters' cash flows and unit economics. The sectoral winners which could capitalize on the India–UK CETA are mapped herein below:

Highest gaining sectors

Textiles, Apparel and Fashion (Highest Visible Gain)

Textiles and apparel are labor-intensive, price-sensitive, and face significant tariff competition in developed markets. Even small duty reductions can change buying decisions and open new large contracts for volume suppliers. Over the years, the UK market has already seen imports in sizeable quantities of textiles from India. With the CETA, many clothing categories are set to face lower UK import duties, thus improving margin competitiveness. Industry groups and trade bodies have specifically flagged textiles as a principal beneficiary.

The UK factsheet records growing bilateral trade and highlights fashion as a headline sector. We can expect export order books for both mass apparel and premium heritage categories (handloom, artisanal work) to expand

in the next 12–36 months window, thus encouraging more partnerships between Indian apparel manufacturers and UK brands.

Gems and Jewelry (Value Play + Origin Rules)

Gems and jewelry are high-value, low-weight goods where duty changes materially alter landed cost and competitiveness. London has long been one of the world's largest jewelry and diamond trading hubs. Tariff relief or preferential treatment under Rules of Origin (ROO) will encourage Indian cutters, polishers and branded jewelry houses to step up exports.

Pharmaceuticals and Fine Chemicals (Margin + Regulatory Access)

India is a global supplier of generic medicines and APIs. The UK's demand for affordable generics and its sophisticated healthcare procurement systems make pharmaceuticals a natural CETA beneficiary, particularly where regulatory alignment and mutual recognition can speed market entry. Such CETA concessions combined with services mobility (professional movement of doctors) can help contract research and clinical trial services tied to pharma exporters.

Engineering Goods and Automobiles (Scale + Structural Change)

Engineering goods from capital machinery to automotive components are India's largest merchandise export sector by value. The CETA's tariff reductions (and, in some cases, quota arrangements) can make Indian components and certain Indian-built cars (like Tata, Mahindra & Mahindra, and Maruti-Suzuki) more competitive in the UK market. The agreement's reported cut in automobile duties (with quota modalities) could incentivize new export models.

Engineering goods typically account for a large single-digit to double-digit share of India's goods exports.

Leather and Footwear (Labor-Intensive, ROO Friendly)

Leather and footwear are classic winners from trade deals because tariff savings directly feed retail pricing. India is a global player in leather goods and can scale exports to the UK fashion market, particularly for mid-market branded footwear. Trade bodies already expect gains for this cluster.

Marine Products, Agro-food and Processed Foods (Niche + High Demand)

British consumers exhibit a sustained demand for specialty food items and processed food products. Under the CETA, the progressive reduction or elimination of applicable customs tariffs, coupled with the potential streamlining and mutual recognition of Sanitary and Phytosanitary (SPS) measures, is expected to significantly enhance market access for Indian exporters. In particular, exporters engaged in the supply of seafood, spices, ready-to-eat packaged foods, and other specialty agricultural commodities are likely to derive substantial commercial benefit. Furthermore, as numerous agricultural tariff lines already fall within the ambit of the RoDTEP scheme, the continued budgetary allocation by the Government of India towards RoDTEP (currently valid till 30 September 2025) serves as a policy signal of sustained fiscal support to this sector, thereby further improving the competitiveness of Indian exports in the UK market.

Electronics and IT services (Services Angle + Embedded Goods)

While trade in goods is expected to capture the primary headlines, the export of services continues to represent India's comparative advantage in bilateral commerce. The CETA incorporates binding commitments on cross-border trade in services, including provisions aimed at facilitating the temporary movement of natural persons (Mode 4 supply), mutual recognition of professional qualifications, and enhanced market access for service providers. These measures have the potential to materially augment India's exports in the Information Technology (IT), Business Process Outsourcing (BPO), and Knowledge Process Outsourcing (KPO) sectors to the UK, while also enabling Indian professionals to access short-term work opportunities in the UK market with reduced procedural barriers.

A Possible Global Supply Chain Redesign

One major opportunity arising due to this CETA is routing of UK origin goods via India to take advantage of preferential access for onward export or regional distribution. Businesses can evaluate the feasibility of setting up or partnering with low-cost contract manufacturing hubs in India, for goods meant for exports to the UK market subject to the ROO thresholds.

Checklist For Turning the CETA into a Competitive Advantage

- **IGST Refunds and Cash Flow:** Higher export volumes will naturally push up IGST refund claims, and if refunds are delayed, short-term working capital pressures could arise. Businesses should tighten refund processes by reconciling export invoices with ICEGATE filings on a regular basis and eliminating any documentation gaps that could trigger scrutiny. For sectors with long project cycles such as heavy equipment or capital goods, IGST refund timelines should be factored into cash-flow projections so that funding gaps do not derail execution.
- **Export Incentives (RoDTEP/RoSCTL):** Labor-intensive product lines continue to be eligible for RoDTEP or RoSCTL benefits, which means exporters should map each SKU to its corresponding RoDTEP rate and to the CETA's tariff concessions. This mapping will allow companies to quantify the per-unit after-tax price advantage and feed that directly into pricing strategies for both tenders and existing customer contracts, ensuring that benefits are not lost in margin compression.
- **ROO Compliance:** To qualify for preferential tariffs under the trade pact, products must meet substantial processing or value-addition thresholds. Companies should review and align supplier agreements to include clear origin clauses, maintain documentation to prove value addition (particularly for subcontracted production), and where necessary, seek advance rulings to remove ambiguity in origin or classification. Accurate classification is not just a customs duty requirement it will also be critical for claiming export incentives.
- **Supply Chain and Contract Structuring:** Exporters should revisit place-of-supply rules, GST implications for contract manufacturing or subcontracting, and invoicing terms to ensure that tax treatment is optimized. Bonded warehouses, FTWZs, or light processing hubs may be used strategically to meet ROO requirements while maintaining cost efficiency. In the case of services exports, contract terms should be reviewed to address GST place-of-supply, reverse charge applicability, and potential UK VAT obligations so that after-tax competitiveness is preserved.
- **Operational and Regulatory Delays:** For sectors such as marine products and processed foods, SPS compliance and export documentation can create bottlenecks that delay shipments and refund claims. These timelines should be budgeted into operational plans, and wherever possible, compliance documentation should be prepared and cleared in advance to avoid demurrage and missed delivery schedules.

- **Tax Modelling:** Companies should re-price contracts after factoring in the combined impact of RoDTEP incentives, IGST refunds, and the revised UK duty structures. This will provide customers with accurate landed cost calculations and allow exporters to capture early pricing advantages, rather than letting competitors undercut them once the market adjusts to the new tariff environment.

The India–UK CETA sets up a multi-sector opportunity: textiles, gems and jewelry, pharmaceuticals, engineering goods, leather, marine products and services each have specific, quantifiable upside. But the advantage goes not to the sector but to companies that translate tariff relief into real pricing, operational changes, and rigorous compliance. From an indirect-tax viewpoint, the twin levers of IGST refunds and RoDTEP will be the primary mechanisms that convert export volumes into better cash flows. Companies that prepare early by mapping HS codes, availing advance rulings, and redesigning supply chains where needed will definitely capture the lion's share of incremental gains.

Alerts

Govt to monitor MRP revision of 54 commodities for 6 months, pursuant to GST rejig

15 September 2025

<https://bit.ly/4ncdwPz>

MCA widens the scope of mergers that can be handled by the Central Government

11 September 2025

<https://bit.ly/46EGRw5>

ITAT Mumbai Clarifies: MLI Provisions Require Separate Notification to Be Enforceable

10 September 2025

<https://bit.ly/48mQrVC>

GST 2.0: Ministry of Consumer Affairs permits additional revised MRP on unsold stock up to 31 December 2025

10 September 2025

<https://bit.ly/4n9bm2X>

UAE Corporate Tax - Ministerial Decision No. 229 and 230 of 2025: Practical Implications for Free Zone Businesses

5 September 2025

<https://bit.ly/4pvvxK9>

Key Highlights: GST Notifications and Clarification Circulars

5 September 2025

<https://bit.ly/3liEMwA>

GST 2.0: Council's Mega Overhaul Slashes Daily Costs, Boosts Refunds, and Targets Sin Goods

4 September 2025

<https://bit.ly/4gqYq5Y>

ADGM Penalizes Company and its Directors for Repeated Non-Compliance

29 August 2025

<https://bit.ly/46aMJgp>



From the Judiciary

Direct Tax

Whether the secondment of employees to an Indian subsidiary constitutes a Permanent Establishment (PE) for the foreign company in India?

Mitsui Mining and Smelting Company Limited [TS-1028-ITAT-2025(DEL)]

Facts

The assessee was a non-resident company incorporated/established in Japan. It was engaged in the business of manufacturing and sale of functional engineered materials and electronic materials. It had a subsidiary named MKCI in India, engaged in the business of manufacturing Catalytic convertors and selling catalytic convertors in India. These convertors were used in automobile industries. The assessee used to provide certain precious metal/chemicals as Offshore sales to its India subsidiary.

The assessee received certain receipts from the Indian subsidiary as reimbursement of remuneration of seconded employees. These employees were getting part of their salary in India and part of their salaries in Japan via present assessee.

After analyzing the agreements of seconded employees between assessee and the India subsidiary, the Assessing Officer (AO) held that the employees of the assessee were exercising complete control over the physical premises of the Indian subsidiary and also carrying out sales operations in India and, hence, the assessee was having Permanent Establishment (PE) in India under Article 5 of India-Japan Treaty. The Dispute Resolution Panel (DRP) upheld the view of the AO.

Held

Tribunal held that AO and DRP misunderstood the Secondment Agreement. The agreement clearly says that:

- The seconded employees would work as part of the MKCI and help with its business in India.

- The seconded employees would be full-time employees of MKCI, working under its control, direction, and supervision.
- These employees would work in their personal capacity, not on behalf of the foreign company (MMS).
- The foreign company is not responsible for any losses caused by these employees while working at MKCI.
- The foreign company has no rights over MKCI's assets and employees.

This means that there was no employer-employee relationship between the foreign company (assessee) and the seconded employees.

According to Article 5 of the India-Japan Tax Treaty, a PE exists only if a foreign company has a fixed place of business in India and conducts business through it. Since these conditions are not met, the tribunal upheld the view of assessee.

Our Comments

This case highlights that a foreign company does not create a Permanent Establishment in India through seconded employees if those employees are fully controlled and employed by the Indian subsidiary.

Whether the Principal Purpose Test (PPT) provisions under the Multilateral Instrument (MLI) can be invoked to deny benefits under the India-Ireland DTAA in the absence of a specific notification under Section 90(1) of the Income-tax Act?

Sky High Appeal XLIII Leasing Company Limited [TS-1085-ITAT-2025(Mum)]

Facts

The assessee, an Ireland-based company, was engaged in the global business of aircraft leasing and had entered into dry operating lease agreements with IndiGo, a leading

Indian airline. In its return of income, the assessee declared nil taxable income in India, asserting that (i) lease rentals received were not “royalty” under Article 12(3)(a) of the India-Ireland DTAA, which specifically excludes payments for the use of aircraft; (ii) in the absence of a PE in India under Article 5, the income constituted business profits taxable only in Ireland under Article 7; and (iii) alternatively, the income was exempt under Article 8(1) of the DTAA as it was derived from the operation of aircraft in international traffic.

The DRP upheld the AO’s key findings, highlighting that the use of an Irish SPV, lacking operational infrastructure or employees, did not establish a genuine presence in Ireland. The DRP also observed that the lease arrangements bore hallmarks of finance leases, based on risk allocation, non-cancellable terms, sub-leasing rights, and the alignment with the aircraft’s economic life. It will lead to addition of tax at the rate of 10% on gross receipts.

Held

The Mumbai ITAT ruled in favor of Sky-High Appeal XLIII Leasing Company, an Ireland-based aircraft lessor, holding that lease rentals earned from IndiGo under dry operating lease arrangements were not taxable in India under the India-Ireland DTAA. This decision represents a significant setback for the Revenue, which had sought to deny treaty benefits by invoking the PPT under the MLI.

The Tribunal categorically rejected the Revenue’s reliance on Articles 6 and 7 of the MLI, which house the PPT provisions, citing the Supreme Court’s ruling in *Nestlé SA*. The ITAT held that no treaty modification via MLI can be enforced under Indian law unless separately notified under Section 90(1) of the Income-tax Act. Although both the India-Ireland DTAA and the MLI were notified independently, the Tribunal noted that the specific impact of the MLI on the India-Ireland DTAA had not been separately notified — a legal requirement per *Nestlé*.

The Tribunal dismissed the Revenue’s argument that the DTAA, being a ‘Covered Tax Agreement’, automatically incorporated the PPT provisions. It clarified that the so-called ‘synthesized text’ of the treaty (which includes MLI modifications) was merely explanatory, carried no legal force, and had not been notified in the Official Gazette. Therefore, the MLI provisions could not be treated as self-executing, and their application against the assessee was legally unsustainable. The ITAT emphasized that while the MLI is intended to enhance efficiency in implementing BEPS-related treaty measures, domestic legal requirements, particularly a Section 90(1) notification, cannot be bypassed. As such, the Revenue’s invocation of the PPT under the MLI failed on jurisdictional grounds.

Even assuming *arguendo* that the MLI applied, the ITAT found no abuse of the treaty. The assessee held a valid Irish Tax Residency Certificate (TRC), had substantial commercial presence in Ireland, and operated under a genuine business model supported by Ireland’s globally

recognized aircraft leasing infrastructure. The Tribunal ruled that mere tax advantage or SPV structure does not imply treaty shopping or artificial avoidance, particularly when supported by commercial rationale.

The ITAT further rejected the existence of a PE in India under Article 5 of the DTAA. It ruled that the mere physical presence of the aircraft in India did not amount to a fixed place PE, and there were no personnel or business operations carried out by the assessee in India.

Lastly, the Tribunal upheld the applicability of Article 8(1) of the DTAA, ruling that lease income from aircraft deployed on both domestic and international routes by IndiGo qualifies as income from the operation of aircraft in international traffic, and is therefore taxable only in the state of residence (Ireland).

Our Comments

This ruling highlights the importance of strict statutory compliance for treaty modifications under Indian tax law, especially concerning the applicability of the MLI and PPT provisions. It underscores that treaty benefits cannot be denied without a valid Section 90(1) notification and reaffirms that genuine commercial substance in cross-border structures must be respected, not merely disregarded on perceived tax motives.

ITAT: Quashes GAAR proceedings; Can’t question timing of stock market transactions by investor

Anvita Bandi TS-1110-HC-2025(TEL)

Facts

The petitioner, a long-term investor, earned long-term capital gains in FY 2019–20 but incurred a INR 176.5 million short-term capital loss trading HCL Technologies shares. The tax authorities invoked General Anti-Avoidance Rules (GAAR), deemed the loss booking an Impermissible Avoidance Arrangement (IAA), and disallowed set-off of the short-term loss against long-term gains under Section 144BA(6). The petitioner challenged this order through a writ petition.

Assessee’s Argument

The trades were genuine, conducted through a recognized stock exchange via her sole DEMAT account, with no knowledge of counterparties or pre-arranged arrangements. The transactions were part of a continuous investment portfolio, not isolated events. The Revenue failed to show any tax-avoidance motive or dealings with related parties, and there was no evidence linking the acquisition and disposal of shares to a tax-avoidance scheme. Mere timing of transactions without lack of commercial substance or contrivance does not satisfy GAAR’s requirements under Section 96.

Respondent's Argument

The authorities contended that the HCL share trades were executed with the primary purpose of manufacturing a loss to offset substantial long-term capital gains, thereby invoking GAAR. They viewed the entire sequence of transactions as a scheme lacking any bona fide commercial purpose, qualifying it as an IAA under GAAR. Consequently, the GAAR invocation was formalized through a valid order issued under Section 144BA(6).

ITATs Decision

The Department failed to establish any collusive or structured arrangement in the HCL share trades, which were genuine and conducted at arm's length. Lacking evidence of a dominant tax avoidance motive and a tainted element, GAAR invocation was unsustainable. Consequently, the order under Section 144BA(6) was set aside, and the writ petition was allowed without costs.

Our Comments

This ruling sets a precedent that protects genuine investors from arbitrary GAAR proceedings. It underscores the importance of substance over form and cautions tax authorities against overreach in interpreting tax avoidance. For M&A and investment professionals, it serves as a reminder to maintain robust documentation and ensure transparency in trading practices, but also offers reassurance that legitimate transactions will not be penalized merely for their timing.

Indirect Tax

Whether initiation of overlapping departmental proceedings for the same contravention is barred under Section 6(2)(b) of the CGST Act, and what constitutes 'initiation of proceedings' for the purposes of this Section?

Armour Security (India) Ltd. vs. Commissioner, CGST, Delhi East Commissionerate [(2025) 33 Centax 222 (S.C.)]

Facts

- The petitioner received show cause notice under Section 73 of the CGST Act/SGST from the State GST authorities alleging under-declaration of turnover vis-à-vis E-way Bills, and excess claim of ITC during FY 2020-21.
- Subsequently, the Central GST authorities conducted a search at the registered premises of the petitioner under Section 67(2) of the CGST Act whereby certain electronic gadgets and documents were seized. This was followed by issuance of summons to four directors under Section 70.
- Pursuant to receipt of one more summons from the Central GST authorities, the petitioner approached the Delhi High Court challenging both summons.
- They argued that the Central GST authorities investigated same 'subject matter' that was previously investigated by State GST authorities and condemned the jurisdiction for initiating parallel proceedings by two different authorities under Section 6(2)(b).
- However, the High Court refused to interfere with the summons issued, holding that the expression "any proceeding" in Section 6(2)(b) cannot be construed to include a search or investigation.
- The High Court noted that the intent of the statute, viz. Section 6(2)(b), is to prevent parallel proceedings relating to assessment, particularly those initiated under Sections 73 and 74 respectively of the CGST Act or any other analogous provisions.
- Aggrieved thereby, the petitioner approached the Apex Court.

Ruling

While dismissing the SLP, SC concluded as follows:

- Section 6(2)(b) of the CGST Act bars the 'initiation of any proceedings' on the 'same subject matter'.
- Any action arising from the audit of accounts or detailed scrutiny of returns must be initiated by the tax administration to which the taxpayer is assigned.
- Intelligence-based enforcement action can be initiated by any one of the Central or State tax administrations despite the taxpayer having been assigned to the other administration.

- Parallel proceedings should not be initiated when one of the tax administrations has already initiated intelligence-based enforcement action.
- All actions that are initiated as a measure for probing an inquiry or gathering of evidence or information do not constitute 'proceedings' within the meaning of Section 6(2)(b).
- The expression 'initiation of proceedings' in Section 6(2)(b) refers to the formal commencement of adjudicatory proceedings by issuance of show cause notice, and does not encompass the issuance of summons, or the conduct of any search, or seizure etc.
- The expression 'subject matter' refers to any tax liability, deficiency, or obligation arising from any specific contravention which the Department seeks to assess or recover.
- Where any two proceedings seek to assess or recover an identical or a partial overlap in the tax liability, deficiency or obligation arising from any specific contravention, the bar of Section 6(2)(b) would be immediately attracted.
- Where the proceedings concern distinct infractions, the same would not constitute a 'same subject matter' even if the tax liability, deficiency, or obligation is same or similar, and the bar under Section 6(2)(b) would not apply.
- The two-fold test for determining whether a subject matter is 'same' entails:
 - Determining if an authority has already proceeded on an identical liability of tax or alleged offence by the assessee on the same facts
 - Determining if the demand or relief sought is identical.

SC also issued following guidelines in cases where, after the commencement of an inquiry/investigation by one authority, another inquiry/investigation on the same subject matter is initiated by a different authority:

- The assessee is obliged to comply/respond to any summons/show cause notice issued by the Central/ State tax authority.
- The assessee shall forthwith inform, in writing, the later authority if another inquiry/investigation on the same matter is ongoing.
- If inquiries are on distinct subject matters, the authorities must clarify to the assessee in writing.
- Any show cause notice issued in respect of a liability already covered by an existing show cause notice shall be quashed.

- The authorities shall decide inter-se which of them will continue with the inquiry/investigation. The taxable person has no locus to claim which authority should proceed with the inquiry/investigation in a particular matter.
- However, where the authorities are unable to reach a decision, the authority that first initiated the inquiry/ investigation shall be empowered to carry it to its logical conclusion and the Courts in such case would be competent to pass an order for transferring the inquiry/ investigation to that authority.
- If it is found that the authorities are not complying with these aforementioned guidelines, it shall be open to the taxable person to file a writ petition before the concerned High Court under Article 226 of the Constitution.

Our Comments

The Apex Court has provided long-awaited and critical clarity on the interpretation of scope of Section 6(2)(b) of the CGST Act. It has unequivocally held that proceedings commence only with the issuance of a show cause notice, and not with summons, search, or investigation. It has thus settled the cleavage of opinions given by various High Courts till date.

The Court has also urged the Directorate General of GST Intelligence (DGGI) to create a robust real-time data-sharing system between Central and State authorities for better coordination and visibility.

The judgment strikes a balance between protecting Revenue's interests vis-à-vis safeguarding the taxpayers from undue harassment.

While taxpayers must comply with inquiries/summons, they are protected from duplicate show cause notices on the same liability, ensuring certainty and avoiding conflicting adjudications.

For tax authorities, the judgement bars parallel recovery notices, mandates harmonious vigilance between Central and State bodies, and cautions against mechanical use of summons.

Transfer Pricing

ITAT Remits TP addition qua interest on outstanding receivables

Acme Cleantech Solutions Pvt. Ltd [ITA No.: 508/Del/2022]

M/s Acme Cleantech Solutions Pvt. Ltd. is a provider of telecommunication equipment, comprehensive passive infrastructure solutions including enclosures, cooling and power solutions to wireless telecom players and related services to mobile operators in India as well as overseas. The assessee entered into international transactions with its associated enterprises ("AEs") during AY 2017-18 and AY 2018-19. Basis this fact, assessee's case was referred to Transfer Pricing Officer (TPO) by the AO.

The Ld. TPO vide its order dated 7 February 2012 computed the Arm's Length Price (ALP) of the international transactions after making certain adjustment and thereafter, the AO passed the draft assessment order, against which the assessee filed its objection before the DRP. The Ld. DRP vide its order dated 20 January 2022 upheld the adjustment made by the TPO as well as also upheld the disallowance of other expenses made by the AO under the provisions of Domestic Law. The issue in Transfer Pricing was addition of notional interest on outstanding receivables from AE of INR 23,014,135.

Aggrieved, the taxpayer appealed before the hon'ble Income Tax Appellate Tribunal (ITAT) that:

- that assessee has not charged any interest from the Non-Associated Enterprises.
- Similar disallowance was deleted by the Ld. CIT(A) in Assessment Year 2012-13 and 2013-14; and
- Revenue has not filed any appeal against that order;

and basis the principle of consistency, no TP addition shall be made.

The honorable Tribunal accepted the assessee's contention and held that in case an enterprise could not charge any interest from the Non Associated Enterprises (Non AEs), then no addition qua interest on receivables outstanding with AE can be made by the TPO. However, the ITAT remitted the file to TPO for the fresh adjudication to consider the facts and figure i.e., what are the figures of amounts qua Non-AE, what was the period of credit given to the Non-AEs as well as AEs, etc.

Our Comments

The assessee relied on the principle of consistency in rebutting the contentions of the AO. Accordingly, it is recommended that there should be consistency in submissions made across multiple assessment years. Further, it is important to align credit period offered to AEs vis-à-vis Non-AEs.

ITAT: Upholds TPO's segregation but remits ALP-determination qua IGS for substantiating need, benefit etc

Portescap India Pvt. Ltd. [ITA No.: 6749/Mum/2024]

Portescap India Pvt. Ltd. is engaged in the business of manufacturing of special purpose motors and sub assemblies for electronic industries. Assessee filed its return for AY 2021-22, declaring income of INR 2.193 billion. During the year under consideration, the assessee has availed the Intra-Group Services (IGS) from its AEs and benchmarked such transaction along with other international transaction using the Transactional Net Margin Method (TNMM) on an aggregation basis.

During assessment proceedings, the case was referred to the TPO, wherein the taxpayer's contention regarding benchmarking the transaction on aggregation basis using TNMM method were rejected. Thereafter, TPO segregated the IGS transactions on the ground that they were not closely linked and questioned the commercial expediency of the payments made towards such services. Further, TPO observed that the assessee had not furnished sufficient evidence to demonstrate the need for, actual rendition of, and benefits derived from the services received. Consequently, the TPO proposed an adjustment by treating the ALP of such services effectively as nil.

Aggrieved by the TPO order, the assessee appealed to DRP, which upheld the addition proposed by the Ld. AO/TPO. Thereafter, the assessee filed its appeal before ITAT.

Before the ITAT, the assessee argued that the payments were genuine, supported by agreements and invoices, and that benefits had been received during the rendition of the services. The assessee also contended that the aggregation approach was consistently followed from previous years which was accepted by TPO earlier. The Revenue, on the other hand, defended the segregation and the adjustment.

In the appeal to the ITAT, the ITAT ruled the matter partially in favor of both the assessee and TPO. It held that the actions of TPO was justified in segregation of intra group services from other transactions as they are not interlinked with each other. Further, ITAT stated that 'every year is separate year, and the transactions have to be analyzed independently qua the year' and therefore, rejected the assessee's contention on the applicability of principle of res judicata.

Our Comments

The taxpayer cannot place sole reliance on aggregation under TNMM for IGS. Further, the taxpayer cannot justify the treatment of transactions on the basis of acceptance by the TPO in earlier years, as the ITAT has held that 'each assessment year is a separate year, and transactions must be examined independently with reference to that

year.' Accordingly, robust documentation is required to be maintained in order to substantiate the need, rendition, benefit, and to demonstrate that the services are neither duplicative nor in the nature of shareholder activities.

Quotes & Coverage

Can India Inc Shield Small Players From Trumpocalypse?

Business World | Prabhat Ranjan

29 August 2025

<https://tinyurl.com/2mw83nra>

Proposed GST reform raises hopes of rate cut on gold; even a 1% drop could save buyers thousands

Fortune India | Prabhat Ranjan

26 August 2025

<https://tinyurl.com/bdd6dayw>

GSTAT's first anti-profiteering ruling expands probe scope, rejects cost-based defences; hospitality, retail on notice

ET CFO | Prabhat Ranjan

14 August 2025

<https://tinyurl.com/262h6ns8>

IBC Amendment 2025: Faster resolutions or more roadblocks?

ET CFO | Subodh Dandawate

14 August 2025

<https://bit.ly/3ljvJLW>

The Clash between IBC and PMLA is nearing a solution

Mint | Subodh Dandawate

11 August 2025

<https://bit.ly/47Lf91P>

Gems & jewelry, textiles to carpets: How Trump's tariffs are wrecking Indian MSMEs

Economic Times | Prabhat Ranjan

8 August 2025

<https://bit.ly/3VTYYb5>

PHDCCI Optimistic On Economy But RBI, Experts Flag Tariff Risks

Business World | Prabhat Ranjan

6 August 2025

<https://bit.ly/3W1BnVX>



Tax Talk

Indian Developments

Direct Tax

Twenty-Second Amendment to Income-Tax Rules, 2025 – Insertion of Rules 3C And 3D

Notification G.S.R. 555(E) [NO. 133/2025/F. NO. 370142/27/2025-TPL] dated 18 August 2025

CBDT has notified the Income-tax (Twenty-Second Amendment) Rules, 2025, inserting Rule 3C and Rule 3D to the Income-tax Rules, 1962.

- As per Section 17(2)(iii), perquisites include the value of any benefit or amenity provided to an employee (other than a director or an employee having substantial interest in a company) by employer, where the employee's salary excluding non-monetary benefits exceeds prescribed amount during the relevant financial year. Rule 3C is inserted to prescribe the salary as INR 400,000 for the purpose of the said sub-.
- As per clause (vi) of proviso to Section 17(2), expenditure incurred by employer on medical treatment of employee or family of employee, travel and stay abroad for such treatment shall not be taxable as perquisite provided the gross total income of employee excluding such expenditure does not exceed specified limits. Rule 3D is inserted to prescribe the gross total income limit as INR 800,000 for the purpose of the said clause.

Indirect Tax

Customs

No import duty on import of cotton till 31 December 2025

Notification No. 35/2025-Customs (Tariff) dated 18 August 2025 and Notification No. 36/2025-Customs (Tariff) dated 28 August 2025

The Ministry of Finance has granted exemption from Basic Customs Duty (BCD) and Agriculture Infrastructure & Development Cess (AIDC) on imports of all forms of raw cotton falling under CTH 5201. The said relief has come into force w.e.f. 19 August 2025 and will remain valid up to and inclusive of 31 December 2025.

Government revises duty drawback rates for gold and silver jewelry/articles

Notification No. 51/2025-Customs (NT) dated 25 August 2025 r/w Notification No. 77/2023-Customs (NT) dated 20 October 2023

Tariff Item	Earlier DBK Rate	Revised DBK Rate
711301 – Articles of jewelry (Gold)	INR 335.50	INR 466.76
711302 – Articles of jewelry (Silver)	INR 4468.10	INR 5234.00
711401 – Articles of silver	INR 4468.10	INR 5234.00

Note: The above rates are prescribed on a per 10-gram basis.

Government extends anti-dumping duty levy on certain products

Notification No.	Date	Tariff item	Country	Extension upto
26/2025-Cus (ADD)	4 August 2025	Black Toner (Powder)	China PR, Malaysia, and Taiwan	5 years
27/2025-Cus (ADD)	6 August 2025	Flax Fabric	China PR and Hong Kong	9 February 2026
28/2025-Cus (ADD)	19 August 2025	Toluene Di-Isocyanate (TDI)	European Union and Saudi Arabia	1 March 2026
29/2025-Cus (ADD)	19 August 2025	Fluoroelastomers (FKM)	China PR	26 February 2026

CBIC updates Authorized Officers for additional 6 Entry Points for food imports

Instruction No. 25/2025-26-Customs dated 6 August 2025

CBIC has updated the list of Authorized Officers (FSSAI officials and Customs officials) at 6 points of entry for food imports, taking the total to 165. The new entry points are included in the states of Assam, Tamil Nadu, Chhattisgarh, Gujarat, and Orissa. Accordingly, importers must ensure that food consignments are routed only through these notified points, where FSSAI-authorized officers are available. Shipments at non-notified locations risk delays, non-clearance, or rejection.

CBIC issues guidelines for export of items suspected to be covered under SCOMET

Instruction No. 26/2025-26-Customs dated 14 August 2025

CBIC has clarified that the Directorate General of Foreign Trade (DGFT) remains the ultimate authority on the issue of classification of SCOMET items. An Inter-Ministerial Working Group (IMWG) under the DGFT is specifically tasked with providing final determination on SCOMET classifications.

To make the process more transparent and efficient, CBIC has established an online repository of SCOMET classification clarifications. Customs officers have been directed to first consult this repository before escalating any matter. If the classification remains unresolved, the case should be referred (with the prior approval of Commissioner) to the Single Nodal Point for Strategic Controls in CBIC i.e., Customs-III Section in Customs Policy Wing.

It has also been reiterated that there is no requirement for a Chartered Engineer certificate for SCOMET classification and export clearance.

Foreign Trade Policy

DGFT revises norms for Diamond Imprest Authorizations to Two Star Export Houses

Notification No. 25/2025-26-DGFT dated 19 August 2025

DGFT has amended the norms for issuance of Diamond Imprest Authorization to Two Star Export Houses. Now,

such exporters can submit a Chartered Accountant certificate in place of the latest Income Tax Return (ITR), if it is not yet filed, with the condition that proof of filing the ITR must be furnished by 31 December of the application year.

Moreover, the imports under Diamond Imprest Authorizations are no longer exempted from whole of IGST and Compensation Cess. On the other hand, the exemption from Basic Customs Duty, Additional Customs Duty, Education Cess, Anti-Dumping Duty, Countervailing Duty, Safeguard Duty, Transition Product Specific Safeguard Duty, wherever applicable, continues.

India imposes port restrictions on import of certain goods from Bangladesh

Notification No. 24/2025-26-DGFT dated 11 August 2025

DGFT has restricted with immediate effect import of certain jute-related products, including bleached and unbleached woven fabrics, twine, cordage, ropes, and sacks from Bangladesh. Such goods are no longer allowed from any land port on the India-Bangladesh border. On the other hand, they are allowed only through Nhava Sheva Seaport.

DGFT relaxes Export Obligation period under Advance Authorizations for chemical products

Notification No. 28/2025-26 dated 28 August 2025

DGFT has removed the 180-day export obligation limit for Advance Authorization holders importing products that are subjected to mandatory QCOs by the Department of Chemicals and Petrochemicals. Henceforth, the export obligation must be fulfilled within 18 months, as prescribed under Para 4.40 of Handbook of Procedures.

DGFT suspends SIONs for food products

Public Notice No. 20/2025-26 dated 26 August 2025

DGFT has suspended the Standard Input Output Norms (SIONs) for several food products, including confectionery, biscuits, rice, refined mustard oil, starches, and other ingredients. Exporters of these items can no longer rely on the suspended SIONs to claim duty-free imports. Instead, they must apply under the Advance Authorization scheme using self-declaration or norms fixed by the Norms Committee.

Tax Talk

Global Developments

Indirect Tax

Malaysia announces cancellation of proposed High Value Goods Tax

Excerpts from various sources

Malaysia has officially cancelled the planned High-Value Goods Tax (HVGST) and instead, has opted to tax the luxury items under revised sales tax system at 5% or 10%. Other key measures remain in force, including the capital gains tax on unlisted share transactions, updates to the sales and services tax and the low-value goods tax on imports.

Czech Republic introduces new VAT Rule requiring repayment of deductions for unpaid liabilities from 2025

Excerpts from various sources

Effective 1 January 2025, the Czech Republic has introduced a new VAT rule (Section 74b) requiring VAT payers to reduce or repay input VAT deductions if they fail to pay for a taxable supply within six months of its due date (Six-month period starts from the end of the month when the invoice became due). If unpaid, the VAT deduction must be adjusted in the tax period when the six-month deadline lapses. Once the liability is paid, whether fully or partially, the taxpayer would regain the right to reclaim the corresponding portion of the VAT deduction in the payment period.

However, the VAT payers must make the correction within two calendar years after the first period when they were required to adjust i.e. after expiry of six months. The rule applies only to supplies received from 2025 onwards and excludes reverse-charge transactions.

Tariff escalation on Indian exports to the USA

Excerpts from various sources

As of 27 August 2025, the U.S. has imposed a 50% tariff on a wide array of Indian exports, doubling the initial 25% rate introduced in early August.

The new increased duty will cover a wide range of exports ranging from textiles, gems, jewellery, leather products, machinery, marine goods (sea food), etc. However, sensitive sectors like pharmaceuticals, medical devices, critical technology components electronics including smart phones, computers and semiconductors remain untouched. 'Made-in-India' Apple iPhones and chips will not see immediate price increases. The notification also clarifies that exceptions will apply to in-transit shipments with valid certification, humanitarian aid consignments, and goods covered under reciprocal trade agreements.

Upcoming Events

Nexdigm UAE Tax Event

6 October 2025

Nexdigm | Nishit Parikh

Middle East Taxation Summit 2025

10 October 2025

Nexdigm | Nishit Parikh



Compliance Calendar

- Direct Tax
- Indirect Tax

7 September 2025

- Securities Transaction Tax - Due date for deposit of tax collected for the month of August 2025
- Commodities Transaction Tax - Due date for deposit of tax collected for the month of August 2025
- Declaration under sub- (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 August 2025 in Form 27C
- Due date for deposit of Tax deducted/collected for the month of August 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

13 September 2025

- GSTR-6 for the month of August 2025 to be filed by Input Service Distributors (ISDs)
- Uploading B2B invoices using Invoice Furnishing Facility (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 August 2025 to be filed by Non-Resident Foreign Taxpayers

14 September 2025

- Due date for issue of TDS Certificate for tax deducted under Section 194-IA in the month of July, 2025 in Form 16B
- Due date for issue of TDS Certificate for tax deducted under Section 194-IB in the month of July, 2025 in Form 16C
- Due date for issue of TDS Certificate for tax deducted under Section 194M in the month of July, 2025 in Form 16D
- Due date for issue of TDS Certificate for tax deducted under Section 194S in the month of July 2025 in Form 16E

10 September 2025

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

11 September 2025

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

15 September 2025

- Return of income except ITR-6 for the Assessment Year 2025-26 for all assessee other than (a) corporate assessee or (b) non-corporate assessee (whose books of account are required to be audited) or (c) working 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 or (d) an assessee who is required to furnish a report under Section 92E.
- 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 July 2025).
- Payment of Self Assessment Tax (if due date of submission of return of income is 31 July 2025).
- Certificate under sub- (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 July 2025) in Form 10CCD.
- Certificate under sub- (2) of Section 80RRB for Patentees in receipt of royalty income, etc. (if due date of submission of return of income is 31 July 2025) in Form 10CCE.
- Report under 80LA(3) of the Income-tax Act, 1961 (if due date of submission of return of income is 31 July 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 July 2025) in Form 10-EE.
- Certificate of foreign inward remittance (if due date of submission of return of income is 31 July 2025) in Form 10H.

Compliance Calendar

- Direct Tax
- Indirect Tax

15 September 2025

- Certificate of the medical authority for certifying person with disability, severe disability, autism, cerebral palsy and multiple disability for purposes of 80DD and 80U (if due date of submission of return of income is 31 July 2025) in Form 10IA.
- Application for exercise of option under sub- (5) of 115BAD of the Income-tax Act, 1961 (if due date of submission of return of income is 31 July 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 July 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 July 2025) in Form 10IH.
- 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 July 2025) in Form 10IK.
- 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 July 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 July 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 July 2025) in Form 3CT.
- Particulars to be furnished under clause (b) of sub- (1B) of Section 10A of the Income-tax Act, 1961 (if due date of submission of return of income is 31 July 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 July 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 July 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 July 2025) in Form 10E.
- 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 July 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 exercise of option under clause (i) of sub- (6) of Section 115BAC or withdrawal of option under the proviso to sub- (6) of Section 115BAC of the Income-tax Act, 1961 (if due date of submission of return of income is 31 July 2025) in Form 10-IEA.
- Due date for furnishing of Form 24G by an office of the Government where TDS/TCS for the month of August 2025.
- Second instalment of advance tax for the assessment year 2026-27.
- 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 August, 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 August, 2025 in Form 3BC.
- 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.

20 September 2025

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

Compliance Calendar

- Direct Tax
- Indirect Tax

25 September 2025

- Payment of tax through GST PMT-06 by taxpayers under QRMP scheme for the month of August 2025

30 September 2025

- Due date for filing of audit report under Section 44AB for the Assessment Year 2025-26 in the case of a corporate assessee or non-corporate assessee (who is required to submit his/its return of income on 31 October 2025, in Form 3CA_CD and Form 3CB_CD.
- Due date for furnishing of challan-cum-statement in respect of tax deducted under Section 194-IA in the month of August 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 August 2025 in Form 26QC.
- Due date for furnishing of challan cum statement in respect of tax deducted under Section 194M in the month of August 2025 in Form 26QD.
- Due date for furnishing of challan cum statement in respect of tax deducted under Section 194S in the month of August 2025 in Form 26QE.
- Audit Report under clause (ii) of Section 115VW of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 66.
- Audit report under clause (b) of the tenth proviso to clause (23C) of Section 10 and sub-clause (ii) of clause (b) of sub (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 31 October 2025) in Form 10B.
- Audit report under clause (b) of the tenth proviso to clause (23C) of Section 10 and sub-clause (ii) of clause (b) of sub- (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 12A (if due date of submission of return of income is 31 October 2025) in Form 10BB.
- Audit report under s 80-I(7)/ 80-IA(7)/ 80-IB/ 80-IC/80-IAC/80-IE (if due date of submission of return of income is 31 October 2025) in Form 10CCB.
- Report under Section 80JJAA of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 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 31 October 2025) in Form 10-IJ.
- Verification by an Accountant under sub-rule (3) of rule 21AJA Verification (if due date of submission of return of income is 31 October 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 31 October 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 31 October 2025, in Form 29C.
- Due date for filing audit report under Section 33AB(2) (if due date of submission of return of income is 31 October 2025, in Form 3AC.
- Due date for filing audit report under Section 33ABA (2) (if due date of submission of return of income is 31 October 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 31 October 2025) in Form 3AE.
- Statement regarding preliminary expenses incurred to be furnished under proviso to clause (a) of sub- (2) of Section 35D of the Income-tax Act, 1961 by the assessee (if due date of submission of return of income is 31 October 2025) in Form 3AF.
- Audit report under sub- (2) of 44DA of the Income-tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 3CE.
- Report of an accountant to be furnished by an assessee under sub- (3) of 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 31 October 2025) in Form 3CEA.

Compliance Calendar

- Direct Tax
- Indirect Tax

30 September 2025

- Application for exercise of option under clause (2) of the Explanation to sub- (1) of 11 of the Income - tax Act, 1961 (if the assessee is required to submit return of income on 30 November 2025) in Form 9A.
- Audit report to be filed by the Sovereign Wealth Fund claiming exemption under clause (23FE) of 10 of the Income -tax Act, 1961. (if due date of submission of return of income is 31 October 2025).
- Statement to be furnished to the Assessing Officer/Prescribed Authority under clause (a) of the Explanation 3 to the third proviso to clause (23C) of 10 or under clause (a) of sub- (2) of Section 11 of the Income-tax Act, 1961 (if the assessee is required to submit return of income on 30 November 2025) in Form 10.
- 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 31 October 2025) in Form 62.
- Report under Section 10AA of the Income -tax Act, 1961 (if due date of submission of return of income is 31 October 2025) in Form 56F.

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- (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

10 October 2025

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

11 October 2025

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

13 October 2025

- GSTR-6 for the month of September 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 September 2025 to be filed by Non-Resident Foreign Taxpayers

Easy Remittance Tool

by Nexdigm



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

About Nexdigm

Nexdigm is a privately held, independent global organization that helps companies across geographies meet the needs of a dynamic business environment. Our focus on problem-solving, supported by our multifunctional expertise, enables us to deliver customized solutions tailored for our clients.

We provide integrated, digitally-driven solutions encompassing Business and Professional Services across industries, helping companies address challenges at all stages of their business lifecycle. Through our direct operations in the USA, Poland, the UAE, and India, we serve a diverse range of client base, spanning multinationals, listed companies, privately-owned companies, and family-owned businesses from over 50 countries. By combining strategic insight with hands-on execution, we help businesses not only develop and optimize strategies but also implement them effectively. Our collaborative approach ensures that we work alongside our clients as partners, translating plans into tangible outcomes that drive growth and efficiency.

At Nexdigm, quality, data privacy, and confidentiality are fundamental to everything we do. We are ISO/IEC 27001 certified for information security and ISO 9001 certified for quality management. Additionally, we comply with GDPR and uphold stringent data protection standards through our Personal Information Management System, implemented under the ISO/IEC 27701:2019 Standard.

We have been recognized over the years by global organizations, including the Everest Group Peak Matrix® Assessment, International Tax Review, World Commerce and Contracting, ISG Provider Lens™ Quadrant Report, International Accounting Bulletin, Avasant RadarView™ Market Assessment, and Global Sourcing Association (GSA) UK.

Nexdigm resonates with our plunge into a new paradigm of business; it is our commitment to **Think Next**.

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