H N A & Co. LLP
Chartered Accountants
(Formerly known as Hiregange & Associates LLP)

Pre-Budget Memorandum

(Budget 2024)

Indirect Taxes

Dated: 02-01-2024

Index

Sl. No	Suggestion	Page No.
Suggestions for GST Law		
Suggestions for changes in CGST Act, CGST Rules & IGST Act:		
1	Relaxation in interest payable on reversal of ITC if consideration is not paid within 180 days from date of supplier's invoice	6
2	Rectification of Compliance requirement in Section 16(2)(c) w.r.t. discharge of tax by supplier through "admissible credit"	6
3	Ensuring demand of tax is made on supplier before approaching the recipient and bringing "intelligible differentia" between genuine & fraudulent taxpayers	7
4	To provide a mechanism for correcting the availment of wrong ITC without any time restriction, interest and penalties	8
5	Interest on net cash liability in case where outward supply invoice is reported belatedly	9
6	TR-06 challan to be made as a valid document to avail credit	9
7	Specified timeline to be provided to issue ASMT-12	10
8	Removal of the time limit for availing input tax credit	11
9	Changing the Annual Returns due date to 31st January from 31st December	12
10	Enabling ITC in case of hotel services/renting of immovable property services procured from other states by amending the place of supply	12
11	Formula to be prescribed for refund of accumulated ITC in case of recipient of deemed exports in Rule 89(4A):	13
12	Formula to be prescribed for refund of accumulated input tax credit in case of recipient of deemed exports in Rule 89(4B):	14
13	Remittance advice issued by Banks to be considered as proof of receipt of export proceeds in CFE	15
14	Time limit to be prescribed for re-credit after rejection of refund	15
15	Proof of receipt of goods in SEZ to be sufficient for refund instead of endorsement from specified officer	16
16	Allowing refund of GST paid on Capital goods used in making Zero-rated supply of goods or services without payment of IGST under Bond/LUT	17
Suggestions for Clarification/Circular sought:		
17	Clarification for non-applicability of Section 16(4) of CGST Act, 2017	18
18	Clarification on taxability of sharing of intangible assets between distinct persons having same PAN	18
19	Circular on taxability of services provided by HO to BO, to clarify inclusion of invoices on which GST is not charged	19

20	Clarification on ITC eligibility on IPO & FPO expenses	20
21	Clarification regarding applicability of Rule 96(10) (qua person/ qua FY/ qua consignment)	20
22	One-time opportunity to be given to rectify and regularise wrong availment of ITC without interest & penalty.	21
23	Clarification on eligibility of ITC on promotional goods distributed in the course of business	21
24	Clarification on the adjustment of Credit Notes in Table 4 and not in the outward supplies under Table 3 of GSTR-3B for FY 17-18 & 18-19	22
25	Capacity-building for Department Officials	23
26	ITC eligibility on leasehold land and TDRs	24
27	Valuation not to be questioned if recipient related party is eligible for full ITC	25
28	Guidelines to be provided relating to payment of tax under protest	26
Suggestions for Changes in GST Common Portal		
29	Personal Hearing option to be made default in GST portal for DRC-01A	26
30	Specify timeline & automate issuance of DRC-04	27
Suggestions for Customs Law		
31	Interest waiver for pre-import condition violation	28
32	Correction of drafting error in Advance Authorisation Exemption	28

Suggestions for GST Law

Suggestions for changes in CGST Act, CGST Rules & IGST Act:

Suggestion 1: Relaxation in interest payable on reversal of ITC if consideration is not paid within 180 days from date of supplier's invoice:

Present Position	As per proviso to Section 16(2) of CGST Act, 2017 read with Rule 37 of CGST Rules, 2017, interest is payable on reversal of ITC from the date of availment, in cases where the recipient of goods/services has failed to make payment to the supplier within 180 days from the date of vendor's invoice.
Difficulties faced	Interest is being paid from the date on which ITC is availed till the date of reversal, although reversal is liable only after expiry of 180 days from date of vendor's invoice. This creates a disparity and a cash burden for the businesses.
Proposed changes	Proviso to Section 16(2) and Rule 37 to be amended such that interest becomes payable only for the period after expiry of 180 days till the actual date of ITC reversal.
Justification	As per the above-mentioned provisions, ITC is liable to be reversed only upon expiry of 180 days from date of supplier's invoice. Accordingly, interest is also required to be payable only for the period from expiry of 180 days till the date of actual ITC reversal made. Further, as per Article 19(1)(g), the citizens of India have the right to practice any profession or to carry on any occupation, trade or business. Provisions such as Rule 37 cannot restrict how citizens undertake their business. Additionally, under Income Tax law, expenses for which consideration is not paid to MSMEs within specified time limit is disallowed. Thus, having the provisions under Rule 37 of CGST Rules would be redundant.

Suggestion 2: Rectification of Compliance requirement in Section 16(2)(c) w.r.t. discharge of tax by supplier through "admissible credit"

Present Position	As per section 16(2)(c) of CGST Act, availment of ITC is subject to the following: *"subject to the provisions of section 41, the tax charged in respect of such supply has been actually paid to the Government, either in cash or through utilisation of input tax credit* ***admissible*** *in respect of the said supply;"*
Difficulties faced	It is an impossible for the recipient to check whether the supplier has utilised eligible ITC or not. This condition, being impossible to fulfil, lead to demand of ITC reversal by

	the department, years after availment of such credit, creating financial burden for the businesses.
Proposed changes	Amend Section 16(2)(c) to provide as follows: *"subject to the provisions of section 41, the tax charged in respect of such supply has been actually paid to the Government, either in cash or through utilisation of input tax credit."*
Justification	Given the system of indirect taxes as such and also the current mechanism in GST, it is an impossible task for the recipient to ensure that the supplier has paid tax by using "eligible" credit. The recipient does not and shall not have access to the purchase details of the supplier in order to ensure fulfilment of this condition. Thus, this condition being impossible to fulfil, is required to be removed from the provisions of CGST Act. This would facilitate seamless flow of credit without any time/money spent on unnecessary litigation upon a condition which is by itself impossible to perform.

Suggestion 3: Ensuring demand of tax is made on supplier before approaching the recipient and bringing "intelligible differentia" between genuine & fraudulent taxpayers

Present Position	Section 16(2)(c) of CGST Act, 2017 provides for a condition wherein the recipient would only be entitled to ITC if the tax charged in respect of such supply has been actually paid by the Supplier. Section 73 & 74 of CGST Act allows for proper officer to issue notice in cases of wrongful availment or utilisation of ITC. Section 74 specifically provides for cases which involves fraud, wilful misstatement and suppression of facts.
Difficulties faced	In cases of non-fulfilment of Section 16(2)(c), the recipients are being demanded to reverse ITC along with interest, despite entering in *bona fide* transactions. This is creating working capital issues & cash outflow burden for the businesses, especially when such demands are raised years after ITC was availed.
Proposed changes	Proviso to be included in Section 73(1) to provide that notices relating to non-fulfilment of Section 16(2)(c) condition cannot be issued under Section 73. Further, proviso to be included in Section 74(1) that in case of demand of reversal of ITC due to non-fulfilment of condition in Section 16(2)(c), notice can be issued only when there is substantial evidence that recipient has colluded or engaged in fraudulent activities along with the supplier, with an intent to evade tax.
Justification	Section 16(2)(c) is arbitrary as it doesn't differentiate between tax evaders and *bonafide* taxpayers violating the principle of ***"intelligible differentia"*** under article 14 of the constitution as held by Supreme Court in case of Arise India Limited Vs Commissioner of Trade and Taxes 2022 (60) G.S.T.L. 215 (S.C.).

	Approaching recipients first (especially in case of genuine recipients) before approaching the supplier for tax recovery jeopardises the trust in the GST system by such *bonafide* businesses. Such businesses are also being forced into litigation and are compelled to reverse eligible ITC, which affects their working capital. Further, it is also seen that the present system gives way to dual recovery of taxes on the same transaction – i.e., in the form of ITC reversal from recipient and tax recovery on supplies from the supplier. Amending the law in line of the above suggestion could mitigate such issues. This is especially the case for period before Rule 37A was introduced.

Suggestion 4: To provide a mechanism for correcting the availment of wrong ITC without any time restriction, interest and penalties.

Present Position	Section 77 of the CGST Act, 2017 allows the supplier to rectify taxes (IGST instead of CGST+SGST or vice versa) that were mistakenly collected and paid to the government without any interest implications in the form of refund. However, there is no specific provision for correcting ITC availed by the recipient when the supplier has corrected the type of tax charged (within 30th November time limit).
Difficulties faced	In cases where the supplier amends invoice to change the type of tax the recipient becomes unable to avail the correct type of tax due to time limit restriction, given that the time limit for amendments and ITC availment are both 30th Nov of next FY.
Proposed changes	A new provision, similar to Section 77, may be introduced to address ITC reversal and re-availment issues by the recipient in cases where the supplier amends its invoice by changing the type of tax. The said facility may be provided without imposing interest implications and by specifying an extended time limit (such as 31st December of next FY) to rectify their wrongly availed credits.
Justification	The onus of charging of correct type of tax on supplies made is on the supplier. The recipient cannot be denied any benefit in case where the supplier has charged incorrect type of tax. In certain cases, interest is also being demanded for such wrongful availment of ITC. Introduction of a provision for reversal of wrong ITC and claiming of correct ITC, similar to Section 77, would mitigate many issues for the business as well as reduce unwarranted time spent on litigation by the Department officials. Specifically since the said scenario is a revenue-neutral situation creating no loss to the Govt, such cases need not be taken into litigation. (Supreme Court judgement in SRF Ltd. vs. Commissioner 2016 (331) ELT A138 (S.C.)].

Suggestion 5: Interest on net cash liability in case where outward supply invoice is reported belatedly

Present Position	The proviso to Section 50(1) of CGST Act provides that the interest on tax payable in respect of supplies made during a tax period and "declared in the return for the said period" furnished after the due date as per section 39 shall be payable on that portion of the tax which is paid by debiting the electronic cash ledger.
Difficulties faced	Where an invoice has been reported in subsequent months (which may be due to oversight, clerical errors etc.), demand is raised for payment of interest on the said invoice on gross amount. This is causing undue hardship to business in the form of cash payments, although sufficient balance of ITC is available.
Proposed changes	Amend proviso to Section 50(1) to provide that interest is payable on net cash liability in all cases, even if an invoice has been declared in subsequent month returns. The liabilities for the particular month to be considered as a whole.
Justification	It is a settled law that interest in tax statutes is compensatory in nature [Pratibha Processors Vs UOI 1996 (88) E.L.T. 12 (S.C.)]. Interest is payable to the Govt only when it is deprived of the funds representing tax component. In a case where there is availability of sufficient ITC in the electronic credit ledger of the assessee, then it is said that the State is enriched to that extent. [Refex Industries Limited Vs Asstt Commr of CGST & C. Ex]. Thus, demand of interest on gross amount of GST where invoice is declared in subsequent month returns would be contrary to the law of the land and economic fairness to the taxpayers. This also creates unwarranted litigation and loss of time & money to the genuine taxpayers.

Suggestion 6: TR-06 challan to be made as a valid document to avail credit

Present Position	TR-6 challan is not a prescribed document to avail ITC, and only bill of entry, tax invoice etc., are the prescribed documents to avail credit as per rule 36(1) of the CGST Rules. [also referred in Para 5.1 (b) circular 16/2023-Cus dated 7th Jun 2023]
Difficulties faced	Loss of credit to the importers on IGST paid through TR-06 challan, thus creating dent in working capital for them.
Proposed changes	Amend Rule 36(1) of CGST Rules, 2017 to include TR-6 challan as a prescribed document to avail ITC.
Justification	Since there are various reasons where department is advising to discharge tax vide TR-6 challan (including de-bonding by EOUs) and there is no other facility to discharge the tax, such credit cannot be denied only on the basis of document used

	for payment. Importers are losing out on credit of IGST paid, which they would have been eligible for, if paid through BoE. Further, it may be noted that under erstwhile law, CENVAT credit was allowed to be availed based on TR-6 challan. Thus, the same needs to be included in GST law as well. Non-prescription of TR-6 challan as a relevant document to avail credit is just procedural in nature. Considering the objective of GST, i.e., to allow seamless flow of credit, availment of credit based on TR-6 challan would be beneficial.

Suggestion 7: Specified timeline to be provided to issue ASMT-12

Present Position	As per Section 61 of the CGST Act read with Rule 99 of CGST Rules, the proper officer is required to inform the registered person in ASMT-12 if the explanation furnished by the registered person is found satisfactory. No time limit to issue ASMT-12 prescribed.
Difficulties faced	Due to absence of time limit, cases still remain open although required tax payments have been made/satisfactory explanation provided to Officer. Having cases open due to such ambiguity leads to unwarranted inquires during Statutory audits as well as during due diligence processes and such cases can be neither be classified as Open nor as Closed.
Proposed changes	Rule 99 of CGST Rules may be amended to specify the time limit to issue Form ASMT-12 (within 15 days from the date of submission of explanation in ASMT-11 or from date of payment). Additionally, the provision may also provide that the proceedings would be dropped automatically if ASMT-12 is not issued within the time limit specified.
Justification	The registered persons should be aware that the proceedings against them are dropped. Accordingly, they can focus on their business aspects and other matters. This would contribute to reducing the burden on the taxpayers. This would also ensure proper disclosure of open cases in Financial Statements/Auditor's report, etc. Further, a timeline would also lead to maintaining a system and consistency among department officials.

Suggestion 8: Removal of the time limit for availing input tax credit

Present Position	As per Section 16(4) of the GST Act, ITC cannot be availed after 30th November following the end of the Financial Year to which such invoice or credit note pertains or furnishing of annual return, whichever is earlier.
Difficulties faced	Taxpayers are losing out on eligible ITC considering the time limit specified in Section 16(4) due to practical difficulties in business, such as: • delay in receipt of goods/services • delay in receipt of invoice • clerical error/omission in accounting for ITC • consolidation & reconciliation of accounts (especially in case where the due date for supplier's ITR falls in November) • approval of ledgers/contracts from suppliers leading to delay accounting of the purchase transaction either due to commercial aspects or where the due date for supplier's ITR falls in November
Proposed changes	Amend the provisions of Section 16(4) such that ITC is made eligible even after the time limit of 30th November of following FY, but subject to payment of certain amount/percentage as penalty. Additionally, a one-time opportunity may be given to taxpayers to avail such time-lapsed ITC for the financial years 2017-18, 18-19 and 19-20 which we not availed due to ignorance of law or adaptation with the new law.
Justification	GST law was implemented with the objective of seamless flow of credit and to avoid cascading of indirect taxes. Denial of credit would be opposed to this objective [Mohit Minerals Pvt Ltd 2020 (033) GSTL (Guj.)]. Further, given the nature of indirect taxation, credit is a vested right, which ensures that tax is ultimately paid on value additions and there is no double taxation [Eicher Motors Ltd Vs UOI 1999 (106) ELT 3 (SC) & Dai Ichi Karkaria Vs UOI 1999 (112) ELT 353 (SC)]. Thus, allowing availment of ITC even past the time limit specified in Section 16(4) would advance the objective of GST and would reduce impact on working capital of the businesses. Further, provision of certain amount/percentage of penalty for availment of ITC after 30th November time limit would help increase compliance. This would also reduce litigation as multiple High Court have given varied judgements regarding the validity of Section 16(4).

Suggestion 9: Changing the Annual Returns due date to 31st January from 31st December

Present Position	Rule 80 of CGST Rules, 2017 provides that the due date for filing the Annual Return for every FY to be 31st December of the following FY.
Difficulties faced	Insufficient time to file correct & complete GSTR-9/9C given the compliances to be done for November month (Such as section 16(4), Credit/debit notes, amendments etc.). Further, there are also compliances to be fulfilled under other laws such as Income Tax returns, filing of annual returns with ROC etc., in the month of November, which would have impact on the disclosures to be made in GSTR-9/9C.
Proposed changes	To amend the law to change the due date for filing Annual Returns from 31st December to 31st January of the following FY.
Justification	Considering the following reasons, an extension of time limit to file GSTR-9/9C till 31st January of next FY would ensure that all adjustments are considered while filing the annual returns: 1. Extension in the last date for availing ITC for FY from 20th October to 30th November of the following FY. 2. Extension in the last date for amendment of GST returns as well as issuance of debit/credit notes from 20th October to 30th November of the following FY. 3. Very less time gap between due date for other compliances such as filing Income Tax Returns (under TP provisions)/Annual Returns with ROC and Annual returns under GST. Since the above compliances have impact on disclosures made in GSTR-9/9C, changing the due date to 31st January would ensure correct & complete disclosures in GSTR-9/9C.

Suggestion 10: Enabling ITC in case of hotel services/renting of immovable property services procured from other states by amending the place of supply

Present Position	As per Section 12(3)(a) and (b) of the IGST Act, 2017, the place of supply of services directly relating to an immovable property (say, renting of immovable property or lodging accommodation) is the location of the immovable property. Thus, all hotels and property owners are charging CGST + respective SGST, irrespective of the fact whether the customer is registered in that State or not.
Difficulties faced	Loss of ITC to the recipient due to CGST+SGST charged by the supplier on rent and hotel accommodation services, as they are registered in a different State. This creates

	working capital issues since a significant portion of ITC gets blocked due to place of supply provisions.
Proposed changes	Section 12(3)(a) and (b) of IGST Act 2017 to be amended to provide that place of supply in case of the said services provided to "registered persons" shall be the location of such person.
Justification	Section 12(7)(a) of the IGST Act, which provides for the place of supply of services by way of organizing a cultural, artistic, sporting event in relation to a conference, fair, exhibition or any other event to be: • location of the registered person if service supplied to a registered person • the place where the event is held in any other case. This provision enables all the B2B registered persons to avail the credit of GST paid on such events. A similar amendment could be brought for Section 12(3)(a) & (b) to enable seamless flow of ITC. Further, the recent changes w.r.t the place of supply in case of 'Over the counter sales' by insertion of clause (ca) to Section 10 of the IGST Act 2017, vouches for GST being a destination-based tax, providing that place of supply even in case of supply to unregistered person shall be the location as per address (or State) of the recipient mentioned in invoice. This is to ensure the GST revenue reaches the consuming state and not the mere handover state. The aforesaid proposed changes resonate with the object of GST being "Destination-based tax" and "Seamless flow of credit".

Suggestion 11: Formula to be prescribed for refund of accumulated ITC in case of recipient of deemed exports in Rule 89(4A):

Present Position	Rule 89(4A) of CGST Rules, 2017 provides for claim of refund of accumulated ITC on inputs & input services (other than inputs on which the supplier has claimed refund) which are used for zero-rated supplies, by recipient of deemed export.
Difficulties faced	Refund applications are being rejected due to want of formula in Rule 89(4A), although the claimant is eligible for refund as per Section 54 read with Rule 89(4A).
Proposed changes	Amend Rule 89(4A) to provide a formula for determining the value of accumulated ITC based on which refund claim can be made.
Justification	Rule 89(4A) does not specify how to determine the value of accumulated ITC on "other" inputs and input services used in making zero-rated supplies. Thus, the refund

	applicants are option for the default formula given in Rule 89(4). This is leading to rejection of refund applications by the officers. Further, given that it is impractical to correlate every input and input services received from suppliers other than deemed exporters, it is suggested that a formula similar to formula in Rule 89(4) be provided for Rule 89(4A) so that refund claims can be filed and processed faster. This would also avoid delays or rejection in refund merely because of absence of computation mechanism in the law. This ensures providing of substantial benefit to the exporters, who earn foreign exchange for the country.

Suggestion 12: Formula to be prescribed for refund of accumulated input tax credit in case of recipient of deemed exports in Rule 89(4B):

Present Position	Rule 89(4B) provides for claim of refund by a merchant exporter of accumulated ITC on inputs charged to them at 0.1% and on other inputs & input services which are used for zero-rated supplies. Rule 89(4B) also provides for claim of refund of accumulated ITC on "other" inputs & input services by persons claiming exemption under Notification No. 78 or 79/2017-Cus.
Difficulties faced	Refund applications are being rejected due to want of formula in Rule 89(4B), although the claimant is eligible for refund as per Section 54 read with Rule 89(4B).
Proposed changes	Amend Rule 89(4B) to provide a formula for determining the value of accumulated ITC based on which refund claim can be made.
Justification	Rule 89(4B) does not specify how to determine the value of accumulated ITC on "other" inputs and input services used in making zero-rated supplies. Thus, the refund applicants are option for the default formula given in Rule 89(4). This is leading to rejection of refund applications by the officers. Further, given that it is impractical to track inputs obtained without exemption in Notification 78/2017 or 79/2017-Cus, it is suggested that a formula similar to formula in Rule 89(4) to be provided for Rule 89(4B) so that refund claims can be filed and processed faster. This would also avoid delays or rejection in refund merely because of absence of computation mechanism in the law, providing substantial benefit to the exporters, who earn foreign exchange for the country.

Suggestion 13: Remittance advice issued by Banks to be considered as proof of receipt of export proceeds in CFE

Present Position	Rule 89(2)(c) of CGST Rules, 2017 requires submission of statement of Bank Reconciliation Certificates (BRCs) and Foreign Inward Remittance Certificates (FIRCs) for refund on account of export of services.
Difficulties faced	Due to discontinuance of FIRCs vide RBI Circular – AP(DIR) Circular No 74 of 26 May 2016 and due to time-consuming & restricted procedure for obtaining e-BRCs, refund applications are rejected even though the claimant has realised proceeds in convertible foreign currency.
Proposed changes	Amend Rule 89(2)(c) to provide that FIRAs and Remittance advices issued by AD banks can also be submitted as proof of receipt of export proceeds in CFE in case of export of services.
Justification	As per RBI Circular – AP(DIR) Circular No 74 of 26 May 2016, RBI decided to discontinue with immediate effect issuance of FIRC for any export related payment. It has also been decided that FIRC may be issued for inward remittance covering FDI/FII. Further, obtaining e-BRCs is a time-consuming procedure, and which is generally given under export promotional schemes by the GOI. Currently, AD Banks are issuing Foreign Inward Remittance Advice (FIRA) or other Remittance Advice as proof for export proceeds realisation in CFE. Such FIRAs are not being accepted by the GST refund issuing officer as the Rule specifies only FIRCs and e-BRCs. It is a settled law that undue delay or rejection of refund applications merely due to procedural lapse is improper, especially where it comes in the way of a substantial benefit (i.e., tax refund for earning CFE for the economy). [Mangalore Chemicals & Fertilizers Ltd. Vs Deputy Commissioner [1991 (55) ELT 437 (SC)] and Tvl. Mehar Tex Vs Commissioner of CGST & C. Ex [2021 (50) G.S.T.L. 357 (Mad.)]

Suggestion 14: Time limit to be prescribed for re-credit after rejection of refund

Present Position	Rule 93 of CGST Rules, 2017 provides that where Deficiency Memo has been issued for a refund application, the amount debited in electronic credit ledger equal to the amount of refund claim shall be credited back to the electronic credit ledger. Further, there is no specific provision for re-credit of refund amount upon passing of refund rejection order.

Difficulties faced	Delays in re-credit to the electronic credit ledger of the applicants is thereby causing delays in filing fresh refund application for the said period.
Proposed changes	Amend Rule 93 to provide for time-limit of maximum 15 days from date of Deficiency Memo, for re-credit of rejected refund amount. A similar time limit to be provided in case of refund rejection order as well.
Justification	Delay in grant of refunds due to taxpayers being unable to file refund applications because of no/delayed re-credit to electronic credit ledger leads to working capital issues for the businesses. Exporters, being earners for foreign exchange for the country, shall be given substantial benefit of tax refund without procedural delays and lapses. Providing a time limit for Officers to re-credit the rejected refund amount would lead to faster processing of refund applications.

Suggestion 15: Proof of receipt of goods in SEZ to be sufficient for refund instead of endorsement from specified officer

Present Position	As per proviso to Rule 89(1) read with Rule 89(2)(e) & (f), supplier of goods/services to an SEZ unit/developer shall file refund application after the goods have been admitted in full to the SEZ for authorized operations upon endorsement by the SEZ officer. Similarly, evidence for receipt of services into the SEZ for authorized operations upon endorsement of SEZ officer is required.
Difficulties faced	Refund claims being rejected due to delays in procurement of endorsement from SEZ officers.
Proposed changes	Amend 1st proviso to Rule 89(1) and Rule 89(2)(e) & (f) to provide that proof of receipt of goods instead of endorsement is sufficient for the purpose of claiming GST refund by the supplier.
Justification	As per Rule 30(5) of SEZ Rules, endorsement is only required for goods & not for services. Pursuant to Section 51 of SEZ Act, 2005, which provides that SEZ law shall prevail in case of inconsistency, requirement of endorsement for services received by SEZ for the purpose of GST refund would be invalid. Further, under SEZ Act, 2005, the Development Commissioner, provides a Letter of Approval (LoA) to the SEZ unit/developer wherein the operations mentioned in the LoA are considered to be "authorised operations". Also, as per Section 16 of SEZ Act, the Approval Committee may cancel the Letter of Approval if the entrepreneur has persistently contravened any of the terms and condition or its obligation provided in

	the LoA. Based on this, it is clear that no SEZ can undertake operations other than authorised operation as mentioned in the LoA, else it gets cancelled. Therefore, the requirement of endorsement by SEZ officer to prove that the goods/services are received for authorized operations, for the purpose of GST refund becomes redundant. This condition unnecessarily creates compliance burden on the supplier, wherein they are compelled to deal with multiple authorities for obtaining GST refund which they are rightfully eligible for.

Suggestion 16: Allowing refund of GST paid on Capital goods used in making Zero-rated supply of goods or services without payment of IGST under Bond/LUT

Present Position	Refund of accumulated ITC under Bond/LUT option for Zero-rated supply of goods or services or both, is presently allowed only for Inputs and Input Services and not for Capital goods based on the formula provided under Rule 89(4) of the CGST Rules 2017.
Difficulties faced	Disallowing refund of ITC on capital goods leads to accumulation of ITC on the electronic credit ledger of the exporter, which remains unusable especially in case where the exporter is an SEZ/EOU or does not deal in domestic supplies. This would ultimately lead to inflation in the prices of goods or services exported, making the Indian products non-competitive in the international market.
Proposed changes	Amend Section 54 and Rule 89(4) to allow refund of accumulated ITC of capital goods in case of zero-rated supplies.
Justification	When refund of GST paid on the capital goods is not allowed, it would get added to the cost of goods and services exported which hamper the competitiveness of the Indian made goods and services in the International Market and goes against the foundation of Make in India scheme. Further, Government schemes encourage FDI in India and are welcoming setting up of manufacturing plants in India (such as for Apple) which encourages the capex investments. When the goods assembled or manufactured in India are exported, denial of refund of ITC of GST paid on capital goods would be a hindrance and discourages capex investments in India.

Suggestions for Clarification/Circular sought:

Suggestion 17: Clarification for non-applicability of Section 16(4) of CGST Act, 2017

Present Position	As per section 16(4) of CGST Act, 2017, the time limit for availing ITC on any **invoice** or **debit note** is restricted to earlier of the following dates: a. 30th November of the next financial year to which invoice/debit note pertains or b. Furnishing of annual return for such FY.
Difficulties faced	Demand from Department for reversal of credit along with interest in case of RCM when time limit under Section 16(4) is exceeded. Further, demand of reversal of IGST paid on imports 16(4) the time limit exceeded based on date of Bill of Entry, although the time limit does not apply to credit taken through Bill of Entry
Proposed changes	A Circular may be issued for clarifying that time limit under Section 16(4) does not apply to RCM cases and import of goods.
Justification	Rule 36(1)(b) allows recipient to avail ITC on the basis of self-invoice raised under section 31(3)(f). Further, the time limit for availing credit under RCM is date of payment as entered in books of accounts of the recipient or the date on which payment debited in his bank account whichever is earlier. Thus, the payment of tax under is not based on invoice. Thus, Section 16(4) would not apply. Providing this clarification would enhance compliance with RCM provisions. In case of IGST paid on import of goods, the document evidencing payment of IGST is Bill of entry which is neither a tax invoice nor a debit note to attract the applicability of time limit u/s. 16(4) of the Act. Exclusion of "bill of entry" in Section 16(4) makes it clear that the time limit does not apply in case of IGST credit on imports. Thus, a Circular to clarify this stance would be beneficial to the businesses and reduce unwarranted litigation.

Suggestion 18: Clarification on taxability of sharing of intangible assets between distinct persons having same PAN

Present Position	Currently, Circular No. 199/11/2023-GST dated 17th July, 2023 clarifies that in case of internally generated services between Head Office (HO) and Branch Offices (BO), where full ITC is not available to the BO, then the most plausible valuation shall be 110% of the cost of the services, excluding employee costs.

Difficulties faced	In cases where certain products are being sold under the same brand name (say, ABC) in multiple states where different GSTINs are obtained, then there is absence of supply, since such intangible assets are created for the entity as a whole.
Proposed changes	Issue a circular to clarify no supply occurs when products are sold under the same brand name in multiple states, wherein different GSTINs are obtained.
Justification	Intangible assets (such as patents, franchisee, technical know-how etc.) form part of the core of any business. Every BO of a distinct person would have equal interest and rights in usage of such patents, know-how etc., as without the same, businesses cannot be conducted. Thus, there would apparently be no "supply" between the entities in different states as such intangible assets are common to all.

Suggestion 19: Circular on taxability of services provided by HO to BO, to clarify inclusion of invoices on which GST is not charged

Present Position	Currently, Circular No. 199/11/2023-GST dated 17th July, 2023 clarifies that in case of common input services procured by Head Office (HO) which is attributable to multiple BOs, then the HO is given the option to either distribute credit through ISD mechanism or raise invoice to the BOs as per valuation in Rule 28.
Difficulties faced	The Circular does not clarify whether cost of services procured by HO on which GST was not charged, needs to be included in the invoice raised by HO to BO. This leads to indirectly paying GST on transactions on which GST is not payable.
Proposed changes	Issue a new circular or to amend the existing Circular No. 199, to clarify that supplies procured by HO, on which the supplier did not charge GST, need not be included in valuation under Rule 28 for the purpose of invoice raised by HO to BO.
Justification	Circular No. 199/11/2023-GST was a welcome move by the Govt, which clarified significant issues in case of services between HO & BO and distribution of credit. Providing a clarification that in case of supplies procured by HO, on which the supplier did not charge GST, need not be included in valuation under Rule 28 for the purpose of invoice raised by HO to BO, would provide a completion of the existing Circular. This also ensures that tax is not collected on supplies which are essentially exempt/not liable to GST, merely due to procedure followed for passing on the credit.

Suggestion 20: Clarification on ITC eligibility on IPO & FPO expenses

Present Position	Section 16(1) allows availment of credit in the course of business. However, the Department contends that expenses towards IPO/FPO related to trading of securities and thus ITC related to the expenses requires to be reversed as per Rule 42 of CGST Rules.
Difficulties faced	Due to absence of clarity on ITC eligibility on IPO/FPO expenses, the taxpayers are being demanded to reverse such ITC, which creates working capital issues and leading to prolonged litigation.
Proposed changes	Issue a circular to clarify the ITC on IPO/FPO expenses is eligible as the proceeds would be ultimately used for in the course or furtherance of business.
Justification	Raising of funds through IPO/FPO becomes a significant part of capital infusion in the businesses and is ultimately used for supply of goods and services. Such expenses are clearly in the course and furtherance of business and are eligible as credit as per Section 16(1) of CGST Act. However, given the varied stands taken by Officials throughout the country, it would be imperative to clarify regarding eligibility of ITC on IPO/FPO expenses.

Suggestion 21: Clarification regarding applicability of Rule 96(10) (qua person/ qua FY/ qua consignment)

Present Position	Rule 96(10) seeks to restrict a claim of refund of IGST paid in following cases: a. If the said exporter has received supplies on which benefit of Deemed Export except EPCG or Merchant Export Scheme has been availed. b. If the said exporter is importing goods without payment of duty under EOU or under advance authorization as per Notification No. 78/2017-Custom dated Oct 13, 2017 and Notification No. 79/2017-Custom dated Oct 13, 2017
Difficulties faced	• Due to absence of clarity that restriction under Rule 96(10) applies on consignment basis, exporters are being disqualified from making exports with payment of tax even if it has received a single supply of goods on which the benefit of the specified notifications have been availed.
Proposed changes	Issue a circular to provide clarification that restriction from opting for export with payment of tax as per Rule 96(10) is on consignment-basis.
Justification	Importers avail benefit of Notification No. 78/2017 or 79/2017 of Customs based on each consignment imported. Such importers also have the option of opting out of such duty exemption and import goods upon payment of appropriate customs duty.

	Accordingly, streamlining the applicability of Rule 96(10) as being based on consignment would provide clarity to both the taxpayers as well as the GST Officials. Further, providing such a clarification would ensure that adequate refunds are provided to the benefit of exporters, ultimately aiding in generating foreign currency for the country.

Suggestion 22: One-time opportunity to be given to rectify and regularise wrong availment of ITC without interest & penalty.

Present Position	If ITC wrongly taken (I instead of C+S), then there are int & penalty implications on wrong availed ITC reversal and right ITC cannot be availed due to time limit u/s16(4).
Difficulties faced	Although RN, resulting in loss of credit, cash outflow and burden of int & penalty.
Proposed changes	Provide a one-time window for correction of erroneous availment and utilization of ITC in the wrong heads and allowing availment of ITC under correct head (for the period during 2017-18 & 2018-19) where the cases are revenue neutral.
Justification	Availment of ITC under wrong head would still lead to a revenue neutral situation for the Government and the taxpayers shall not be penalised or forced into litigation, especially when the law was in its nascent stage and the GST portal experienced multiple technical glitches. [Commissioner of C.EX & CUS., Vadodara Vs Narmada Chematur Pharmaceuticals Ltd 2004-TIOL-113-SC-CX-LB]. Many taxpayers are being demanded to reverse the ITC claimed under wrong head during initial period of GST, even if such wrong availment/utilisation was out of genuine reasons. An amnesty scheme for this issue would largely benefit the industry and would not be revenue-adverse also since it is a revenue neutral situation.

Suggestion 23: Clarification on eligibility of ITC on promotional goods distributed in the course of business

Present Position	As per section 17(5)(h) of the Act, Input tax credit is blocked in respect of goods disposed of by way of gift or free samples.
Difficulties faced	Demand is raised for reversal of ITC in case of promotional items given to customers/prospective customers even when it is in the course or furtherance of business.

Proposed changes	Issue a clarificatory circular regarding ITC eligibility on promotional goods given free of cost, in the form of promotional items such as calendars, pens etc., with or without a brand name engraved on it, for the purpose of give-away to customers.
Justification	In a business any goods given free of cost is with expectation of further commercial business with the recipient. Thus, there is no existence of a "gift" in business which is given without consideration. This especially holds true when promotional items are given to customers/prospective customers, which is given with the intention of obtaining/increasing business with them. Providing promotional items to customers/prospective customers is a normal part of business in various industries. The same is done for boosting sales and revenue of the business. Further, purchase of such promotional items forms part of cost of sales of goods/cost of provision of services. Therefore, these sales promotion goods or services is not required to be regarded as "gifts". A circular clarifying the scope of "gifts" in Section 17(5)(h) and the ITC eligibility on promotional items in various scenarios would create more transparency and reduce unwarranted litigation, considering the interest of large number of businesses.

Suggestion 24: Issuance of clarification on the adjustment of Credit Notes in Table 4 and not in the outward supplies under Table 3 of GSTR-3B for F.Y. 2017-18 and 2018-19

Present Position	The credit notes issued by the suppliers are required to be disclosed in Table 9 of GSTR-1 and adjusted with the taxable turnover in Table 3 of the GSTR-3B.
Difficulties faced	In the early stages of GST implementation, GST being a new law, and return filing made mandatory through the GST portal, the registered persons who had issued GST Credit Note had added the value of credit note to the ITC in Table 4 of GSTR-3B, due to ignorance of return filing procedure and continuance of old practices. Accordingly, for the FY 2017-18 and 2018-19, the registered persons are receiving notices from the GST Department demanding reversal of such value of credit notes included in Table 4, along with interest.
Proposed changes	Considering the aforesaid difficulties, a Circular may be issued in this regard clarifying that a procedural lapse in Table disclosures will not warrant reversal of ITC, for FY 2017-18 and 2018-19 as there is no revenue loss to the exchequer.

Justification	It is a settled law that revenue neutral situations shall not lead to denial of benefit for the taxpayers. [SRF Ltd. vs. Commissioner [2016 (331) ELT A138 (S.C.), UOI vs. Zenith Spinners 2015 (326) ELT 23 (S.C)]. Hon'ble High Court of Rajasthan in the matter of National Engineering Industries Ltd [2016-TIOL-922-HC-RAJ-CX] held that substantial benefit cannot be denied because of procedural irregularity. In this case, especially, given that GST law was new to both the taxpayers as well as the Department and given that these scenarios are revenue neutral, a Circular specifying that demand of tax in such revenue neutral scenarios can be avoided and would also be beneficial as it would reduce time & money spent on unwarranted litigation and proceedings for both taxpayer and the Department.

Suggestion 25: Capacity-building for Department Officials

Present Position	While conducting proceedings which require face-to-face interaction with taxpayers such as inspection, audit, search/seizure, summons or even attachment of bank accounts, proper procedures for conduct of such proceedings is provided to the Officials and where such procedures/guidelines are given, there is no process to confirm adherence to them.
Difficulties faced	It is being seen that in cases such as summons, although guidelines have been issued, the proper officer, in certain circumstances, are issuing summons to senior management and to merely obtain documents. Absence of specific guidelines for bank account attachment, is sometimes leading to attachment of bank account without knowledge of the taxpayer and their business is hampered due to restriction to access bank account for salary or vendor payments.
Proposed changes	Detailed instructions/guidelines to be provided to Department officials for procedure to be followed for all kinds of proceedings. This could specifically be in the case of bank attachments where no threshold is provided in law. A mechanism needs to be put in place to ensure that bank attachment is done only when there is clear evidence that tax has been evaded with *mala fide* intent. Further, a capacity-building program may also be conducted for the department officials to make them aware of their powers and the boundaries within which the powers should be exercised (including behavioural training).
Justification	Proceedings undertaking without following adequate procedure also leads to tarnishing the name of the business as well as fear for the Department officials. Given that the attitude of taxpayers has changed in recent times. Government and the public

	services are no longer on a solemn and supreme level in society. More and more citizens expect to be dealt with by public services and their staff of civil service on a level of equality, understanding and respect. The most cost-effective means of collecting taxes is through the voluntary compliance with the tax laws. The performance of any department depends on motivation, teamwork and competence and performance related skills of the staff. Motivation and interpersonal skills are other critical factors that facilitate user friendly and effective department performance. Ensuring optimum deliverables at workplace to ensure effectiveness of tax collection through improved staff performance is the priority strategy taken up by the GST Department. Considering the pace of changes happening in GST regime, it is very much essential for all the officers of GST Department to get updated with the changes made on day-to-day basis. It is very much essential to conduct capacity Building Program for all the officers of GST department on regular basis.

Suggestion 26: ITC eligibility on leasehold land and TDRs

Present Position	Section 17(5)(d) restricts ITC of goods/services procured for construction of immovable property.
Difficulties faced	Citing the above-mentioned provisions, ITC of GST paid on lease charges of leasehold land and w.r.t. TDRs are being held as ineligible by the Department and reversal of such ITC is being demanded. A significant portion of credit is being lost by businesses due to the same.
Proposed changes	To issue clarification that GST paid on lease of leasehold land and TDRs are not included in Section 17(5)(d) and is eligible as ITC, since the provisions only restrict ITC on goods and services for used construction of immovable property.
Justification	Section 17(5)(d) restrict ITC on *"goods or services or both received by a taxable person* ***for construction*** *of an immovable property (other than plant or machinery) on his own account including when such goods or services or both are used in the course or furtherance of business."* Obtaining lease on land/TDRs are mere facility made available to a person, who may use such leasehold land/TDR for purposes other than for construction. Restricting ITC of GST paid on lease/TDRs would go against the scope of Section 17(5)(d) and lead to blockage of huge amounts of credits for businesses.

Suggestion 27: Valuation not to be questioned if recipient related party is eligible for full input tax credit.

Present Position	The 2nd Proviso to Rule 28 of CGST Rules, 2017 provides that where the recipient related party is eligible for full ITC, then the value declared in the invoice shall be deemed to be the open market value for the purpose of valuation for GST.
Difficulties faced	Irrespective of the valuation provided in the 2nd proviso to Rule 28, the Department continues to demand for valuation as per Rule 28(1) i.e., open market value/Rule 30/Rule 31, even in cases where the recipient is eligible for full ITC. This is leading to unwarranted litigation and cash crunch due for the recipient due to reversal of credits in this regard.
Proposed changes	To issue clarification/guidelines to Officers that based on 2nd proviso to Rule 28(1), valuation of goods/services between related parties need not be questioned, when the recipient is eligible for full ITC.
Justification	The rationale behind the 2nd proviso to rule 28(1) which deems that value declared in invoice is the open market value when the recipient is eligible for full ITC, considers the concept of revenue neutrality. In the case of Mahindra & Mahindra Ltd Vs CCE [2019 (368) E.L.T. 105 (Tri. - Mumbai)] affirmed by the Supreme Court in [2019 (368) E.L.T. A41 (S.C.)], the Department had demanded inclusion of R&D expenses & royalty for discharge of duty for removal of goods to sister unit. The Supreme Court accepted the contention of revenue neutrality and set aside the demand since the receiving sister entity would anyhow be eligible for CENVAT Credit. Relying on similar decisions of Supreme Court in various other cases, it would go against the concept of revenue neutrality in cases where valuation is questioned for supplies between related parties where the recipient is eligible for full ITC. Thus, providing a guideline to the Officers to not consider questioning valuation in such cases would be beneficial for various business and saves time of the Officers as well as unnecessary litigation can be avoided.

Suggestion 28: Guidelines to be provided relating to payment of tax under protest.:

Present Position	Currently, the GST law does not have any specific provision or Circular regarding procedure for payment of tax under protest and refund thereof, wherever applicable.
Difficulties faced	Due to absence of provisions or guidelines for payment of tax under protest, there is non-acceptance of payments of tax under protest by assessees, hindering the litigation process. Further, absence of guidelines relating to refund of tax paid under protest is also causing undue financial hardship to the assessees.
Proposed changes	A proviso to be inserted to Section 54(1) to clarify that time limit (of 2 years) for filing refund application would not apply in case of payment of tax under protest (similar to provisions under Customs law and erstwhile Central Excise law). Further, issue a circular providing guidelines regarding: a) Procedure for payment of tax under protest b) Payments made which would be considered as payment under protest c) Procedure for refund of tax paid earlier under protest
Justification	As per the Constitution of India, 'to protest' is a fundamental right for a taxpayer, paying duty/tax under protest is a luxury of fundamental right, and no special rules to enable the same are required. 'Under protest' is an essential component of the 'natural justice principles. Payment of taxes under protest implies a legal challenge to the matter on its grounds. Not accepting the judgement, order, notification, or circular in order to pursue natural justice, and especially not at the expense of revenue, is a challenge to the basic right or constitutional privilege.

Suggestions for Changes in GST Common Portal:

Suggestion 29: Personal Hearing option to be made default in GST portal for DRC-01A

Present Position	As per Section 75(4) of the CGST Act, the person chargeable with tax is being provided with an opportunity to be heard where such a person requests such opportunity in writing.
Difficulties faced	The GST portal, while filing reply to pre-SCN intimation in Form DRC-01A, the portal does not provide an option for "Personal Hearing". The preview of reply to DRC-01A post submission shows "No" under "Personal Hearing required". This is creating disability to the taxpayers from exercising right of opportunity of being heard.

Proposed changes	To change the interface in the portal and allow for "Personal Hearding required?" button with Yes/No option, with "Yes" option as default.
Justification	Providing opportunity of being heard is the basic foundation of law system in India. Any citizen cannot be deprived of it in any circumstance. The taxpayers cannot be denied their basic right of being heard merely because of online system. Thus, changing the interface of the portal to allow Personal Hearing option for DRC-01A also (similar to SCN Reply) would uphold the doctrine and ensure assessees are given opportunity of being heard in all circumstances.

Suggestion 30: Specify timeline & automate issuance of DRC-04

Present Position	As per Rule 142 of CGST Rules, the proper officer is required to issue Form GST DRC-04 as an acknowledgment against the information received by the proper officer in GST DRC-03 for the payment made by the taxpayer.
Difficulties faced	Non-issuance of DRC-04 is leading to confusion among the assessees as to whether the payment has been considered/acknowledged. There are also instances where due to change in jurisdictional officers, re-investigation is being done on payments made through DRC-03.
Proposed changes	Issuance of DRC-04 acknowledgement could be made automatic on the GST portal so that it reduces Official's time as well as provides a closure to the taxpayers regarding such payments made.
Justification	The registered persons should be made aware that, the proper officer has acknowledged the payment made by the registered person. Making the payment acknowledgement in DRC-04 automated would also save time spent by officers by mitigating re-visit of payments made earlier through DRC-03.

Suggestions for Customs Law

Suggestion 31: Interest waiver for pre-import condition violation

Present Position	Pursuant to the Supreme Court in the case of UOI Vs. Cosmo Films, in April 2023, which upheld the validity of the pre-import condition during the period from 13.10.17 to 8.1.19, the CBIC issued Circular No. 16/2023 dated 7th June 2023, which provided for payment of IGST, along with interest, for the period **13.10.17 to 8.1.19** where pre-import conditions were not fulfilled.
Difficulties faced	Providing for payment of interest for the said period of 13.10.17 to 8.1.19 in the year 2023 (after almost 4 years) is leading to high amount of interest, sometimes even equal to the amount of duty involved. This is leading to financial hardships for the importers creating a dent in their working capital management, considering the ambiguity of law present during the said period.
Proposed changes	Waive off interest on IGST payable vide Circular No. 16/2023 and allow refund of interest where it was already paid by importers under the Circular.
Justification	Given the impracticality of fulfilment of pre-import condition and the ambiguity of the provisions applicable for the said period, charging interest for the said period would be unwarranted. The Supreme Court judgement was given in the public interest and levying of interest on payment of IGST due to non-fulfilment of pre-import condition would be discriminatory to the Advance Authorisation holders (although export obligation was fulfilled) as against importers opting for other schemes.

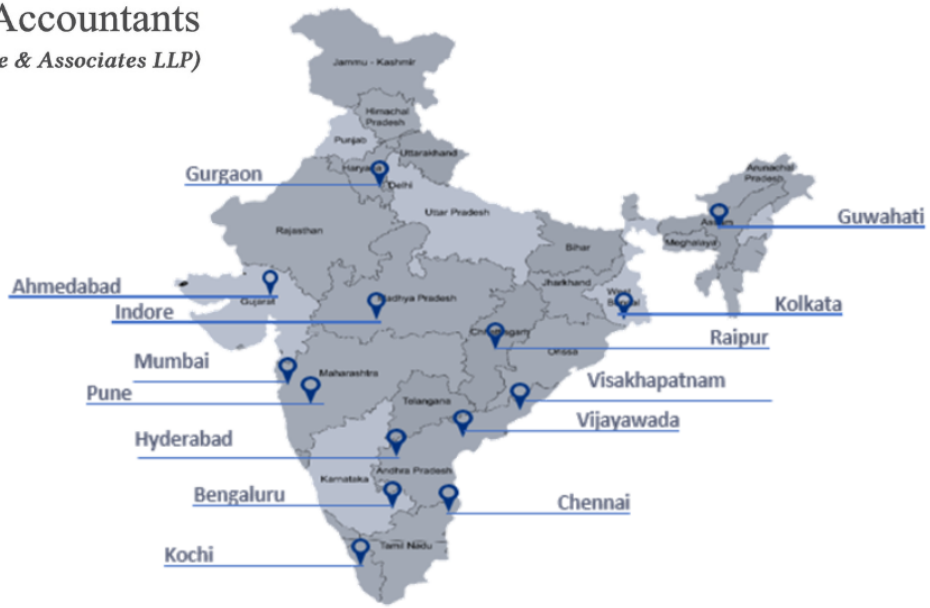
Suggestion 32: Correction of drafting error in Advance Authorisation Exemption

Present Position	Notification No. **21**/2023-Cus exempts various duties of customs, including IGST & compensation cess, on import of goods by Advance Authorisation holders. Notification No. **22**/2023-Cus exempts various duties of customs, (but excluding IGST & compensation cess) on import of goods by holders of Advance Authorisation for deemed exports.
Difficulties faced	Ambiguity in applicability of notification for IGST exemption in case of Advance Authorisation for deemed exports. (Whether Notification 21/2023 applies or Notification 22/2023 applies?)
Proposed changes	Amend Notification 22/2023-Cus to include exemption for IGST and compensation cess for Advance Authorisation for deemed exports. Or provide clarification that in case of

	Advance Authorisation for deemed exports, exemption from IGST can be claimed vide Notification No. 21/2023-Cus
Justification	The ambiguity in determining the Notification applicable for IGST & compensation cess exemption in case of Advance Authorisation for deemed exports is creating practical issues for the industry for claiming the benefit by selection of appropriate notification in the Bill of Entry. This leads to rejection of benefit and delay in assessment of bill of entry, which leads to delay in receipt of goods for manufacture and impact the exports. Providing this clarification would also lead to parity between all types of AA holders with respect to exemption from IGST & compensation cess.

H N A & Co. LLP
Chartered Accountants

(Formerly known as Hiregange & Associates LLP)



Bengaluru (HO)
1010, 2nd floor, 26th Main,
(Above Corporation Bank)
4th T Block, Jayanagar,
Bengaluru - 560 041.
Tel:+918041210703
roopa@hnaindia.com

Pune
K Square, Office No 206, 207,
& 208, 2nd Floor, Foundry
Preschool Rd, Baner, Pune,
Maharashtra - 411045.
Tel:+912029910717
ravikumar@hnaindia.com

Hyderabad
4th Floor, Anushka Pride,
Road Number 12, Banjara Hills,
Hyderabad, Telangana – 500 034.
Tel:+919908113787
sudhir@hnaindia.com

Gurugram (NCR)
509, Vipul Trade Centre,
Sohna Road, Sector 48,
Gurugram – 122 009.
Tel:+918510950400
ashish@hnaindia.com

Mumbai
No.409, Filix, Opp. Asian Paints,
LBS Marg, Bhandup West,
Mumbai – 400 078.
Tel:+919867307715
vasant.bhat@hnaindia.com

Guwahati
2A, 2nd Floor, Royal Silver Tower,
Ulubari, Guwahati- 781 007.
Tel:+917670087000
mannu@hnaindia.com

Chennai
Fagun Chambers,
Third Floor,
No.26, EthirajSalai, Egmore,
Chennai – 600 008.
Tel:+919962508380
vikram@hnaindia.com

Vishakhapatnam
D.No 8-1-112, Premier House,
2nd Floor, Vidyanagar, Opp.III
Town Police Station,
PeddaWaltair,
Visakhapatnam-530017 Tel:
+918916009235
anil@hnaindia.com

Kolkata
Unit#1009, 10th Floor, Merlin
Infinite DN - 51, Street Number 11,
DN Block, Salt Lake Sector V,
Kolkata - 700 091
Tel:+919830682188
gagan@hnaindia.com

Raipur
503, Babylon Capital,
VIP Chowk, Raipur
Tel: +917415790391
bhaveshmittal@hnaindia.com

Indore
107, B Block, The One, 5 RNT
Marg, Indore – 452001
Tel: +916366775136
vini@hnaindia.com

Vijayawada
D. No. 40-26/1-8, Sri Ram Nagar,
Mohiddin Estates,
Labbipet, Vijayawada – 520010
Tel: +9199000 68920
rajeshmaddi@hnaindia.com

Kochi
62/6742C, 2nd Floor,
Jos Brothers Building, Jos Jn,
MG Road, Kochi - 682 015.
Tel: +918547853584
arjun@hnaindia.com

Ahmedabad
908, Mauryansh Elanza,
Shyamal Cross Roads, Satellite,
Ahemedabad - 380015
Tel: +919409172331
yash@hnaindia.com