

Contents

<i>Analysis of Amendments brought in by the Finance Act, 2026</i>	1.2
CR 1: <i>Comparative table of Sections of Income Tax Act, 1961 and Income Tax Act, 2025</i>	1.42
CR 2: <i>Comparative table of Sections of New Income Tax Act, 2025 and Income Tax Act, 1961</i>	1.110
CR 3: <i>Comparative table of clause-wise definitions of Section 2 of New Income Tax Act, 2025 and Section 2 of Income Tax Act, 1961 & other relevant sections</i>	1.139
CR 4: <i>Repeal and Savings</i>	1.143
<i>Summarised Comparative Analysis of Provisions of Income Tax Act, 2025 vis-à-vis Provisions of Income Tax Act, 1961</i>	1.149
<i>How to approach the book</i>	1.189

CHAPTER I Preliminary

1. Short title, extent and commencement. <i>[Erstwhile Section 1 of ITA 1961]</i>	2.1
2. Definitions. <i>[Erstwhile Section 2 of ITA 1961]</i>	1
3. Definition of "tax year" <i>[Erstwhile definition of "Previous Year" was given under Section 3 of ITA 1961]</i>	2.39

CHAPTER II Basis of charge

4. Charge of income-tax. <i>[Erstwhile Section 4 of ITA 1961]</i>	2.39
5. Scope of total income. <i>[Erstwhile Section 5 of ITA 1961]</i>	2.41
6. Residence in India. <i>[Erstwhile Section 6 of ITA 1961]</i>	2.42
7. Income deemed to be received and dividend deemed to be income in a tax year. <i>[Erstwhile Section 7 and 8 of ITA 1961 merged]</i>	2.44
8. Income on receipt of capital asset or stock-in-trade by specified person from specified entity. <i>[Erstwhile Section 9B of ITA 1961]</i>	2.45
9. Income deemed to accrue or arise in India. <i>[Erstwhile Section 9 and 9A of ITA 1961 merged]</i>	2.47
10. Apportionment of income between spouses governed by Portuguese Civil Code. <i>[Erstwhile Section 5A of ITA 1961]</i>	2.59

CHAPTER III**Incomes which do not form part of total income***A.-Incomes not to be included in total income*

11. Incomes not included in total income. 2.60
 [Erstwhile Section 10, 10AA of ITA 1961 merged]

B.-Incomes not to be included in total income of political parties and electoral trusts

12. Incomes not included in total income of political parties and 2.60
 electoral trusts.
 [Erstwhile Sections 13A & 13B of ITA 1961 merged]

CHAPTER IV**Computation of total income***A.-Heads of income*

13. Heads of income. 2.60
 [Erstwhile Section 14 of ITA 1961]

14. Income not forming part of total income and expenditure in relation to 2.61
 such income.
 [Erstwhile Section 14A of ITA 1961]

B.-Salaries

15. Salaries. 2.63
 [Erstwhile Section 15 of ITA 1961]

16. Income from salary. 2.64
 [Erstwhile Section 17(1) of ITA 1961]

17. Perquisite. 2.65
 [Erstwhile Section 17(2) of ITA 1961]

18. Profits in lieu of salary. 2.68
 [Erstwhile Section 17(3) of ITA 1961]

19. Deductions from salaries. 2.70
 [Erstwhile Sections 16 and exemption which was allowed under erstwhile sections 10(10), 10(10A), 10(10AA), 10(10B) & 10(10C) of ITA 1961 now allowed as deduction after including the entire amount received in the meaning of salary]

C.-Income from house property

20. Income from house property. 2.77
 [Erstwhile Section 22 of ITA 1961]

21. Determination of annual value. 2.78
 [Erstwhile Section 23 of ITA 1961]

22. Deductions from income from house property. 2.80
 [Erstwhile Section 24 of ITA 1961]

23. Arrears of rent and unrealised rent received subsequently. 2.81
 [Erstwhile Sections 25 & 25A of ITA 1961 merged]

24. Property owned by co-owners. 2.82
 [Erstwhile Section 26 of ITA 1961]

25.	Interpretation. <i>[Erstwhile Section 27 of ITA 1961]</i>	2.82
	<i>D.-Profits and gains of business or profession</i>	
26.	Income under head "Profits and gains of business or profession." <i>[Erstwhile Section 28 of ITA 1961]</i>	2.83
27.	Manner of computing profits and gains of business or profession. <i>[Erstwhile Section 29 of ITA 1961]</i>	2.88
28.	Rent, rates, taxes, repairs and insurance. <i>[Erstwhile Sections 30, 31 & 38 of ITA 1961 merged]</i>	2.88
29.	Deductions related to employee welfare. <i>[Erstwhile Sections 36(1)(iv), (iva), (v), (va) with Explanation, 40A(7)(b) & 40A(9) of ITA 1961 merged]</i>	2.89
30.	Deduction on certain premium. <i>[Erstwhile Sections 36(1)(i), (ia), (ib) of ITA 1961 merged]</i>	2.90
31.	Deduction for bad debt and provision for bad and doubtful debt. <i>[Erstwhile Sections 36(1)(vii), 36(1)(viii) & 36(2) of ITA 1961 merged]</i>	2.91
32.	Other deductions. <i>[Erstwhile Sections 36(1)(ii), (iii), (iiia), (viii) and Explanation, 36(1)(xii), (xvii), (xviii), 36(1)(ix), 36(1)(vi), 36(1)(xvi) & 40A) merged]</i>	2.94
33.	Deduction for depreciation. <i>[Erstwhile Sections 32 & 38 of ITA 1961 merged]</i>	2.99
34.	General conditions for allowable deductions. <i>[Erstwhile Section 37 of ITA 1961]</i>	2.106
35.	Amounts not deductible in certain circumstances. <i>[Erstwhile Section 40 of ITA 1961]</i>	2.116
36.	Expenses or payments not deductible in certain circumstances. <i>[Erstwhile Section 40A of ITA 1961]</i>	2.120
37.	Certain deductions allowed on actual payment basis only. <i>[Erstwhile Section 43B of ITA 1961]</i>	2.124
38.	Certain sums deemed as profits and gains of business or profession. <i>[Erstwhile Section 41 of ITA 1961]</i>	2.126
39.	Computation of actual cost. <i>[Erstwhile Section 43(1) with Explanation of ITA 1961]</i>	2.130
40.	Special provision for computation of cost of acquisition of certain assets. <i>[Erstwhile Section 43C of ITA 1961]</i>	2.135
41.	Written down value of depreciable asset. <i>[Erstwhile Section 43(6) of ITA 1961]</i>	2.136
42.	Capitalising impact of foreign exchange fluctuation. <i>[Erstwhile Section 43A of ITA 1961]</i>	2.138
43.	Taxation of foreign exchange fluctuation. <i>[Erstwhile Section 43AA of ITA 1961]</i>	2.139

44.	Amortisation of certain preliminary expenses. <i>[Erstwhile Section 35D of ITA 1961]</i>	2.140
45.	Expenditure on scientific research. <i>[Erstwhile Section 35 of ITA 1961]</i>	2.143
46.	Capital expenditure of specified business. <i>[Erstwhile Section 35AD of ITA 1961]</i>	2.147
47.	Expenditure on agricultural extension project and skill development project. <i>[Erstwhile Sections 35CCC & 35CCD of ITA 1961 merged]</i>	2.152
48.	Tea development account, coffee development account and rubber development account. <i>[Erstwhile Section 33AB of ITA 1961]</i>	2.153
49.	Site Restoration Fund. <i>[Erstwhile Section 33ABA of ITA 1961]</i>	2.153
50.	Special provision in case of trade, profession or similar association. <i>[Erstwhile Section 44A of ITA 1961]</i>	2.153
51.	Amortisation of expenditure for prospecting certain minerals. <i>[Erstwhile Section 35E of ITA 1961]</i>	2.154
52.	Amortisation of expenditure for telecommunications services, amalgamation, demerger, scheme of voluntary retirement, etc. <i>[Erstwhile Sections 35ABA, 35ABB, 35DD & 35DDA of ITA 1961 merged]</i>	2.156
53.	Full value of consideration for transfer of assets other than capital assets in certain cases. <i>[Erstwhile Section 43CA of ITA 1961]</i>	2.159
54.	Business of prospecting for mineral oils. <i>[Erstwhile Section 42 of ITA 1961]</i>	2.160
55.	Insurance business. <i>[Erstwhile Section 44 of ITA 1961]</i>	2.161
56.	Special provision in case of interest income of specified financial institutions. <i>[Erstwhile Section 43D of ITA 1961]</i>	2.162
57.	Revenue recognition for construction and service contracts. <i>[Erstwhile Section 43CB of ITA 1961]</i>	2.162
58.	Special provision for computing profits and gains of business or profession on presumptive basis in case of certain residents. <i>[Erstwhile Sections 44AD, 44ADA & 44AE of ITA 1961 merged]</i>	2.163
59.	Computation of royalty and fee for technical services in hands of non-residents. <i>[Erstwhile Section 44DA of ITA 1961]</i>	2.167
60.	Deduction of head office expenditure in case of non-residents. <i>[Erstwhile Section 44C of ITA 1961]</i>	2.168

61.	Special provision for computation of income on presumptive basis in respect of certain business activities of certain non- residents. <i>[Erstwhile Sections 44B, 44BB, 44BBA, 44BBB, 44BBC and 44BBD of ITA 1961 merged]</i>	2.170
62.	Maintenance of books of account. <i>[Erstwhile Section 44AA of ITA 1961]</i>	2.174
63.	Tax audit. <i>[Erstwhile Section 44AB of ITA 1961]</i>	2.175
64.	Special provision for computing deductions in case of business reorganisation of co-operative banks. <i>[Erstwhile Section 44DB of ITA 1961]</i>	2.177
65.	Interpretation for purposes of section 64 <i>[Erstwhile Section 44DB of ITA 1961]</i>	2.178
66.	Interpretation. <i>[Erstwhile Section 43 of ITA 1961]</i>	2.179
	<i>E.-Capital gains</i>	
67.	Capital gains. <i>[Erstwhile Section 45 of ITA 1961]</i>	2.185
68.	Capital gains on distribution of assets by companies in liquidation. <i>[Erstwhile Section 46 of ITA 1961]</i>	2.191
69.	Capital gains on purchase by company of its own shares or other specified securities. <i>[Erstwhile Section 46A of ITA 1961]</i>	2.192
70.	Transactions not regarded as transfer. <i>[Erstwhile Section 47 of ITA 1961]</i>	2.194
71.	Withdrawal of exemption in certain cases. <i>[Erstwhile Section 47A of ITA 1961]</i>	2.203
72.	Mode of computation of capital gains. <i>[Erstwhile Section 48 of ITA 1961]</i>	2.204
73.	Cost with reference to certain modes of acquisition. <i>[Erstwhile Section 49 of ITA 1961]</i>	2.206
74.	Special provision for computation of capital gains in case of depreciable assets. <i>[Erstwhile Section 50 of ITA 1961]</i>	2.211
75.	Special provision for cost of acquisition in case of depreciable asset. <i>[Erstwhile Section 50A of ITA 1961]</i>	2.213
76.	Special provision for computation of capital gains in case of Market Linked Debenture. <i>[Erstwhile Section 50AA of ITA 1961]</i>	2.213
77.	Special provision for computation of capital gains in case of slump sale. <i>[Erstwhile Section 50B of ITA 1961]</i>	2.214

78.	Special provision for full value of consideration in certain cases. <i>[Erstwhile Section 50C of ITA 1961]</i>	2.215
79.	Special provision for full value of consideration for transfer of share other than quoted share. <i>[Erstwhile Section 50CA of ITA 1961]</i>	2.217
80.	Fair market value deemed to be full value of consideration in certain cases. <i>[Erstwhile Section 50D of ITA 1961]</i>	2.218
81.	Advance money received. <i>[Erstwhile Section 51 of ITA 1961]</i>	2.218
82.	Profit on sale of property used for residence. <i>[Erstwhile Section 54 of ITA 1961]</i>	2.218
83.	Capital gains on transfer of land used for agricultural purposes not to be charged in certain cases. <i>[Erstwhile Section 54B of ITA 1961]</i>	2.222
84.	Capital gains on compulsory acquisition of lands and buildings not to be charged in certain cases. <i>[Erstwhile Section 54D of ITA 1961]</i>	2.224
85.	Capital gains not to be charged on investment in certain bonds. <i>[Erstwhile Section 54EC of ITA 1961]</i>	2.225
86.	Capital gains on transfer of certain capital assets not to be charged in case of investment in residential house. <i>[Erstwhile Section 54F of ITA 1961]</i>	2.227
87.	Exemption of capital gains on transfer of assets in cases of shifting of industrial undertaking from urban area. <i>[Erstwhile Section 54G of ITA 1961]</i>	2.231
88.	Exemption of capital gains on transfer of assets in cases of shifting of industrial undertaking from urban area to any Special Economic Zone. <i>[Erstwhile Section 54GA of ITA 1961]</i>	2.232
89.	Extension of time for acquiring new asset or depositing or investing amount of capital gains. <i>[Erstwhile Section 54H of ITA 1961]</i>	2.234
90.	Meaning of "adjusted", "cost of improvement" and "cost of acquisition." <i>[Erstwhile Section 55 of ITA 1961]</i>	2.234
91.	Reference to Valuation Officer. <i>[Erstwhile Section 55A of ITA 1961]</i>	2.238
<i>F.-Income from other sources</i>		
92.	Income from other sources. <i>[Erstwhile Section 56 of ITA 1961]</i>	2.239
93.	Deductions. <i>[Erstwhile Section 57 of ITA 1961]</i>	2.244
94.	Amounts not deductible. <i>[Erstwhile Section 58 of ITA 1961]</i>	2.246

- | | | |
|-----|---|-------|
| 95. | Profits chargeable to tax.
<i>[Erstwhile Section 59 of ITA 1961]</i> | 2.247 |
|-----|---|-------|

CHAPTER V

Income of other persons included in total income of assessee

- | | | |
|------|---|-------|
| 96. | Transfer of income without transfer of assets.
<i>[Erstwhile Section 60 of ITA 1961]</i> | 2.247 |
| 97. | Chargeability of income in transfer of assets.
<i>[Erstwhile Sections 61 & 62 of ITA 1961 merged]</i> | 2.247 |
| 98. | "Transfer" and "revocable transfer" defined.
<i>[Erstwhile Section 63 of ITA 1961]</i> | 2.248 |
| 99. | Income of individual to include income of spouse, minor child, etc.
<i>[Erstwhile Section 64 of ITA 1961]</i> | 2.248 |
| 100. | Liability of person in respect of income included in income of another person.
<i>[Erstwhile Section 65 of ITA 1961]</i> | 2.252 |

CHAPTER VI

Aggregation of income

- | | | |
|------|--|-------|
| 101. | Total income.
<i>[Erstwhile Section 66 of ITA 1961]</i> | 2.252 |
| 102. | Unexplained credits.
<i>[Erstwhile Section 68 of ITA 1961]</i> | 2.252 |
| 103. | Unexplained investment.
<i>[Erstwhile Sections 69 & 69B of ITA 1961 merged]</i> | 2.256 |
| 104. | Unexplained asset.
<i>[Erstwhile Sections 69A & 69B of ITA 1961 merged]</i> | 2.258 |
| 105. | Unexplained expenditure.
<i>[Erstwhile Section 69C of ITA 1961]</i> | 2.260 |
| 106. | Amount borrowed or repaid through negotiable instrument, hundi, etc.
<i>[Erstwhile Section 69D of ITA 1961]</i> | 2.261 |
| 107. | Charge of tax. | 2.261 |

CHAPTER VII

Set off, or carry forward and set off of losses

- | | | |
|------|--|-------|
| 108. | Set off of losses under same head of income.
<i>[Erstwhile Section 70 of ITA 1961]</i> | 2.261 |
| 109. | Set off of losses under any other head of income.
<i>[Erstwhile Section 71 of ITA 1961]</i> | 2.262 |
| 110. | Carry forward and set off of loss from house property.
<i>[Erstwhile Section 71B of ITA 1961]</i> | 2.262 |
| 111. | Carry forward and set off of loss from Capital gains.
<i>[Erstwhile Section 74 of ITA 1961]</i> | 2.263 |

112.	Carry forward and set off of business loss. <i>[Erstwhile Section 72 of ITA 1961]</i>	2.263
113.	Set off and carry forward of losses computed in respect of speculation business. <i>[Erstwhile Section 73 of ITA 1961]</i>	2.264
114.	Set off and carry forward of losses computed in respect of specified business. <i>[Erstwhile Section 73A of ITA 1961]</i>	2.265
115.	Set off and carry forward of losses from specified activity. <i>[Erstwhile Section 74A of ITA 1961]</i>	2.266
116.	Treatment of accumulated losses and unabsorbed depreciation in amalgamation or demerger, etc. <i>[Erstwhile Section 72A of ITA 1961]</i>	2.267
117.	Treatment of accumulated losses and unabsorbed depreciation in scheme of amalgamation in certain cases. <i>[Erstwhile Section 72AA of ITA 1961]</i>	2.271
118.	Carry forward and set off of losses and unabsorbed depreciation in business reorganisation of co-operative banks. <i>[Erstwhile Section 72AB of ITA 1961]</i>	2.273
119.	Carry forward and set off of losses not permissible in certain cases. <i>[Erstwhile Sections 78 & 79 of ITA 1961 merged]</i>	2.275
120.	No set off of losses against undisclosed income consequent to search, requisition and survey. <i>[Erstwhile Section 79A of ITA 1961]</i>	2.277
121.	Submission of return for losses. <i>[Erstwhile Section 80 of ITA 1961]</i>	2.277

CHAPTER VIII

Deductions to be made in Computing Total Income

A.-General

122.	Deductions to be made in computing total income. <i>[Erstwhile Section 80A of ITA 1961]</i>	2.278
	<i>B.-Deductions in respect of certain payments</i>	
123.	Deduction for life insurance premia, deferred annuity, contributions to provident fund, etc. <i>[Erstwhile Section 80C of ITA 1961]</i>	2.280
124.	Deduction in respect of employer and assessee contribution to pension scheme of Central Government. <i>[Erstwhile Section 80CCD of ITA 1961]</i>	2.280
125.	Deduction in respect of contribution to Agnipath Scheme. <i>[Erstwhile Section 80CCH of ITA 1961]</i>	2.282
126.	Deduction in respect of health insurance premia. <i>[Erstwhile Section 80D of ITA 1961]</i>	2.282

Income-tax Act, 2025	Contents
127. Deduction in respect of maintenance including medical treatment of a dependant who is a person with disability. <i>[Erstwhile Section 80DD of ITA 1961]</i>	2.284
128. Deduction in respect of medical treatment, etc. <i>[Erstwhile Section 80DDB of ITA 1961]</i>	2.286
129. Deduction in respect of interest on loan taken for higher education. <i>[Erstwhile Section 80E of ITA 1961]</i>	2.287
130. Deduction in respect of interest on loan taken for residential house property. <i>[Erstwhile Section 80EE of ITA 1961]</i>	2.288
131. Deduction in respect of interest on loan taken for certain house property. <i>[Erstwhile Section 80EEA of ITA 1961]</i>	2.288
132. Deduction in respect of purchase of electric vehicle. <i>[Erstwhile Section 80EEB of ITA 1961]</i>	2.289
133. Deduction in respect of donations to certain funds, charitable institutions, etc. <i>[Erstwhile Section 80G of ITA 1961]</i>	2.290
134. Deductions in respect of rents paid. <i>[Erstwhile Section 80GG of ITA 1961]</i>	2.293
135. Deduction in respect of certain donations for scientific research or rural development. <i>[Erstwhile Section 80GGA of ITA 1961]</i>	2.294
136. Deduction in respect of contributions given by companies to political parties. <i>[Erstwhile Section 80GGB of ITA 1961]</i>	2.295
137. Deduction in respect of contributions given by any person to political parties. <i>[Erstwhile Section 80GGC of ITA 1961]</i>	2.295
<i>C.-Deductions in respect of certain incomes</i>	
138. Deductions in respect of profits and gains from industrial undertakings or enterprises engaged in infrastructure development, etc. <i>[Erstwhile Section 80-IA of ITA 1961]</i>	2.295
139. Deductions in respect of profits and gains by an undertaking or enterprise engaged in development of Special Economic Zone. <i>[Erstwhile Section 80-IAB of ITA 1961]</i>	2.296
140. Special provision in respect of specified business. <i>[Erstwhile Section 80-IAC of ITA 1961]</i>	2.296
141. Deduction in respect of profits and gains from certain industrial undertakings. <i>[Erstwhile Section 80-IB of ITA 1961]</i>	2.299
142. Deductions in respect of profits and gains from housing projects. <i>[Erstwhile Section 80-IBA of ITA 1961]</i>	2.300

143.	Special provisions in respect of certain undertakings in North-Eastern States. <i>[Erstwhile Section 80-IE of ITA 1961]</i>	2.300
144.	Special provisions in respect of newly established Units in Special Economic Zones. <i>[Erstwhile Section 10AA of ITA 1961]</i>	2.302
145.	Deduction for businesses engaged in collecting and processing of bio-degradable waste. <i>[Erstwhile Section 80JJA of ITA 1961]</i>	2.303
146.	Deduction in respect of additional employee cost. <i>[Erstwhile Section 80JJA of ITA 1961]</i>	2.303
147.	Deductions for income of Offshore Banking Units and Units of International Financial Services Centre. <i>[Erstwhile Section 80LA of ITA 1961]</i>	2.305
148.	Deduction in respect of certain inter-corporate dividends. <i>[Erstwhile Section 80M of ITA 1961]</i>	2.307
149.	Deduction in respect of income of co-operative societies. <i>[Erstwhile Section 80P of ITA 1961]</i>	2.307
151.	Deduction in respect of royalty income, etc., of authors of certain books other than text-books. <i>[Erstwhile Section 80QQB of ITA 1961]</i>	2.312
152.	Deduction in respect of royalty on patents. <i>[Erstwhile Section 80RRB of ITA 1961]</i>	2.313
	<i>D.-Deductions in respect of other incomes</i>	
153.	Deduction for interest on deposits. <i>[Erstwhile Section 80TTA & 80TTB of ITA 1961 merged]</i>	2.315
	<i>E.-Other deductions</i>	
154.	Deduction in case of a person with disability. <i>[Erstwhile Section 80U of ITA 1961]</i>	2.316
	CHAPTER IX Rebates and reliefs <i>A.-Rebates and reliefs</i>	
155.	Rebate to be allowed in computing income-tax. <i>[Erstwhile Section 87 of ITA 1961]</i>	2.316
156.	Rebate of income-tax in case of certain individuals. <i>[Erstwhile Section 87A of ITA 1961]</i>	2.317
157.	Relief when salary, etc., is paid in arrears or in advance. <i>[Erstwhile Section 89 of ITA 1961]</i>	2.317
158.	Relief from taxation in income from retirement benefit account maintained in a notified country. <i>[Erstwhile Section 89A of ITA 1961]</i>	2.318

<i>B.-Double taxation relief</i>		
159.	Agreement with foreign countries or specified territories and adoption by Central Government of agreement between specified associations for double taxation relief. <i>[Erstwhile Sections 90 & 90A of ITA 1961 merged]</i>	2.318
160.	Countries with which no agreement exists. <i>[Erstwhile Section 91 of ITA 1961]</i>	2.322
CHAPTER X		
Special provisions relating to avoidance of tax		
161.	Computation of income from international transaction and specified domestic transaction having regard to arm's length price. <i>[Erstwhile Section 92 of ITA 1961]</i>	2.323
162.	Meaning of associated enterprise. <i>[Erstwhile Section 92A of ITA 1961]</i>	2.324
163.	Meaning of international transaction. <i>[Erstwhile Section 92B of ITA 1961]</i>	2.325
164.	Meaning of specified domestic transaction. <i>[Erstwhile Section 92BA of ITA 1961]</i>	2.328
165.	Determination of arm's length price. <i>[Erstwhile Section 92C of ITA 1961]</i>	2.328
166.	Reference to Transfer Pricing Officer. <i>[Erstwhile Section 92CA of ITA 1961]</i>	2.331
167.	Power of Board to make safe harbour rules. <i>[Erstwhile Section 92CB of ITA 1961]</i>	2.334
168.	Advance pricing agreement. <i>[Erstwhile Section 92CC of ITA 1961]</i>	2.334
169.	Effect to advance pricing agreement. <i>[Erstwhile Section 92CD of ITA 1961]</i>	2.336
170.	Secondary adjustment in certain cases. <i>[Erstwhile Section 92CE of ITA 1961]</i>	2.337
171.	Maintenance, keeping and furnishing of information and document by certain persons. <i>[Erstwhile Section 92D of ITA 1961]</i>	2.339
172.	Report from an accountant to be furnished by persons entering into international transaction or specified domestic transaction. <i>[Erstwhile Section 92E of ITA 1961]</i>	2.339
173.	Definitions of certain terms relevant to computation of arm's length price, etc. <i>[Erstwhile Section 92F of ITA 1961]</i>	2.339
174.	Avoidance of income-tax by transactions resulting in transfer of income to non-residents. <i>[Erstwhile Section 93 of ITA 1961]</i>	2.341

175.	Avoidance of tax by certain transactions in securities. <i>[Erstwhile Section 94 of ITA 1961]</i>	2.343
176.	Special measures in respect of transactions with persons located in notified jurisdictional area. <i>[Erstwhile Section 94A of ITA 1961]</i>	2.346
177.	Limitation on interest deduction in certain cases. <i>[Erstwhile Section 94B of ITA 1961]</i>	2.347

CHAPTER XI

General Anti-Avoidance Rule

178.	Applicability of General Anti-Avoidance Rule. <i>[Erstwhile Section 95 of ITA 1961]</i>	2.349
179.	Impermissible avoidance arrangement. <i>[Erstwhile Section 96 of ITA 1961]</i>	2.349
180.	Arrangement to lack commercial substance. <i>[Erstwhile Section 97 of ITA 1961]</i>	2.349
181.	Consequences of impermissible avoidance arrangement. <i>[Erstwhile Section 98 of ITA 1961]</i>	2.351
182.	Treatment of connected person and accommodating party. <i>[Erstwhile Section 99 of ITA 1961]</i>	2.352
183.	Application of this Chapter. <i>[Erstwhile Sections 100 & 101 of ITA 1961 merged]</i>	2.352
184.	Interpretation. <i>[Erstwhile Section 102 of ITA 1961]</i>	2.352

CHAPTER XII

Mode of payment in certain cases etc.

185.	Mode of taking or accepting certain loans, deposits and specified sum. <i>[Erstwhile Section 269SS of ITA 1961]</i>	2.354
186.	Mode of undertaking transactions. <i>[Erstwhile Section 269ST of ITA 1961]</i>	2.356
187.	Acceptance of payment through prescribed electronic modes. <i>[Erstwhile Section 269SU of ITA 1961]</i>	2.357
188.	Mode of repayment of certain loans or deposits or specified advances. <i>[Erstwhile Section 269T of ITA 1961]</i>	2.357
189.	Interpretation. <i>[Erstwhile Section 269T of ITA 1961]</i>	2.358

CHAPTER XIII

Determination of tax in special cases

A.-Determination of tax in certain special cases

190.	Determination of tax where total income includes income on which no tax is payable. <i>[Erstwhile Section 110 of ITA 1961]</i>	2.359
------	---	-------

Income-tax Act, 2025	Contents
191. Tax on accumulated balance of recognised provident fund. <i>[Erstwhile Section 111 of ITA 1961]</i>	2.359
192. Tax in case of block assessment of search cases. <i>[Erstwhile Section 113 of ITA 1961]</i>	2.359
193. Tax on income from Global Depository Receipts purchased in foreign currency or capital gains arising from their transfer. <i>[Erstwhile Section 115ACA of ITA 1961]</i>	2.359
194. Tax on certain incomes.	2.361
195. Tax on income referred to in sections 102 to 106. <i>[Erstwhile Section 115BBE of ITA 1961]</i>	2.366
<i>B.-Special provisions relating to tax on capital gains</i>	
196. Tax on short- term capital gains in certain cases. <i>[Erstwhile Section 111A of ITA 1961]</i>	2.366
197. Tax on long-term capital gains. <i>[Erstwhile Section 112 of ITA 1961]</i>	2.367
198. Tax on long- term capital gains in certain cases. <i>[Erstwhile Section 112A of ITA 1961]</i>	2.369
<i>C. – New tax regime</i>	
199. Tax on income of certain manufacturing domestic companies. <i>[Erstwhile Section 115BA of ITA 1961]</i>	2.371
200. Tax on income of certain domestic companies. <i>[Erstwhile Section 115BAA of ITA 1961]</i>	2.371
201. Tax on income of new manufacturing domestic companies. <i>[Erstwhile Section 115BAB of ITA 1961]</i>	2.372
202. New tax regime for individuals, Hindu undivided family and others. <i>[Erstwhile Section 115BAC of ITA 1961]</i>	2.374
203. Tax on income of certain resident co- operative societies. <i>[Erstwhile Section 115BAD of ITA 1961]</i>	2.376
204. Tax on income of certain new manufacturing co-operative societies. <i>[Erstwhile Section 115BAE of ITA 1961]</i>	2.377
205. Conditions for tax on income of certain companies and co-op. societies. <i>[Erstwhile Sections 115BA, 115BAA, 115BAB, 115BAC, 115BAD & 115BAE of ITA 1961 merged]</i>	2.379
<i>D.-Special provisions relating to Minimum Alternate Tax and Alternate Minimum Tax</i>	
206. Special provision for minimum alternate tax and alternate minimum tax. <i>[Erstwhile Sections 115JA, 115JAA, 115JB, 115JC, 115JD, 116JE, 115JEE and 115JF of ITA 1961 merged]</i>	2.382
<i>E.-Special provisions relating to non-residents and foreign companies</i>	
207. Tax on dividends, royalty and fees for technical service in case of foreign companies. <i>[Erstwhile Section 115A of ITA 1961]</i>	2.395

208.	Tax on income from units purchased in foreign currency or capital gains arising from their transfer. <i>[Erstwhile Section 115AB of ITA 1961]</i>	2.397
209.	Tax on income from bonds or Global Depository Receipts purchased in foreign currency or capital gains arising from their transfer. <i>[Erstwhile Section 115AC of ITA 1961]</i>	2.399
210.	Tax on income of Foreign Institutional Investors from securities or capital gains arising from their transfer. <i>[Erstwhile Section 115AD of ITA 1961]</i>	2.400
211.	Tax on non- resident sportsmen or sports associations. <i>[Erstwhile Section 115BBA of ITA 1961]</i>	2.402
212.	Interpretation. <i>[Erstwhile Section 115C of ITA 1961]</i>	2.403
213.	Special provision for computation of total income of non-residents. <i>[Erstwhile Section 115D of ITA 1961]</i>	2.404
214.	Tax on investment income and long-term capital gains. <i>[Erstwhile Section 115E of ITA 1961]</i>	2.404
215.	Capital gains on transfer of foreign exchange assets not to be charged in certain cases. <i>[Erstwhile Section 115F of ITA 1961]</i>	2.405
216.	Return of income not to be furnished in certain cases. <i>[Erstwhile Section 115G of ITA 1961]</i>	2.406
217.	Application of benefits under sections 212 to 216. <i>[Erstwhile Section 115H of ITA 1961]</i>	2.406
218.	Tax on business income of Offshore Banking Units or International Financial Services Centre unit. <i>[Erstwhile Section 115-I of ITA 1961]</i>	2.407
219.	Conversion of an Indian branch of foreign company into subsidiary Indian company. <i>[Erstwhile Section 115]G of ITA 1961]</i>	2.407
220.	Foreign company said to be resident in India. <i>[Erstwhile Section 115]H of ITA 1961]</i>	2.408
	<i>F.-Special provisions relating to pass-through entities</i>	
221.	Tax on income from securitisation trusts. <i>[Erstwhile Section 115TCA of ITA 1961]</i>	2.409
222.	Tax on income in case of venture capital undertakings. <i>[Erstwhile Section 115U of ITA 1961]</i>	2.411
223.	Tax on income of unit holder and business trust. <i>[Erstwhile Section 115UA of ITA 1961]</i>	2.412
224.	Tax on income of investment fund and its unit holders. <i>[Erstwhile Section 115UB of ITA 1961]</i>	2.412

<i>G.-Special provisions relating to income of shipping companies</i>		
225.	Income from business of operating qualifying ships. <i>[Erstwhile Section 115VA of ITA 1961]</i>	2.414
226.	Tonnage tax scheme. <i>[Erstwhile Sections 115VB, 115VD, 115VE & 115VF of ITA 1961 merged]</i>	2.415
227.	Computation of tonnage income. <i>[Erstwhile Sections 115VG, 115VH & 115VX of ITA 1961 merged]</i>	2.416
228.	Relevant shipping income and exclusion from book profit. <i>[Erstwhile Sections 115V-I, 115VJ & 115V-O of ITA 1961 merged]</i>	2.418
229.	Depreciation and gains relating to tonnage tax assets. <i>[Erstwhile Sections 115VK & 115VN of ITA 1961 merged]</i>	2.420
230.	Exclusion of deduction, loss, set off, etc. <i>[Erstwhile Sections 115VL & 115VM of ITA 1961 merged]</i>	2.422
231.	Method of opting of tonnage tax scheme and validity. <i>[Erstwhile Sections 115VP, 115VR, 115VS & 115VQ of ITA 1961 merged]</i>	2.423
232.	Certain conditions for applicability of tonnage tax scheme. <i>[Erstwhile Sections 115VT, 115VU, 115VV, 115VW & 115VZA of ITA 1961 merged]</i>	2.425
233.	Amalgamation and demerger. <i>[Erstwhile Sections 115VY & 115VZ of ITA 1961 merged]</i>	2.428
234.	Avoidance of tax and exclusion from tonnage tax scheme. <i>[Erstwhile Sections 115VZB & 115VZC of ITA 1961 merged]</i>	2.429
235.	Interpretation. <i>[Erstwhile Sections 115V, 115VC & 115VD of ITA 1961 merged]</i>	2.430

CHAPTER XIV
Tax Administration

A.-Authorities, jurisdiction and functions

236.	Income-tax authorities. <i>[Erstwhile Section 116 of ITA 1961]</i>	2.432
237.	Appointment of income-tax authorities. <i>[Erstwhile Section 117 of ITA 1961]</i>	2.432
238.	Control of income-tax authorities. <i>[Erstwhile Section 118 of ITA 1961]</i>	2.433
239.	Instructions to subordinate authorities. <i>[Erstwhile Section 119 of ITA 1961]</i>	2.433
240.	Taxpayer's Charter. <i>[Erstwhile Section 119A of ITA 1961]</i>	2.435
241.	Jurisdiction of income-tax authorities. <i>[Erstwhile Section 120 of ITA 1961]</i>	2.435
242.	Jurisdiction of Assessing Officers. <i>[Erstwhile Section 124 of ITA 1961]</i>	2.436

243.	Power to transfer cases. <i>[Erstwhile Section 127 of ITA 1961]</i>	2.437
244.	Change of incumbent of an office. <i>[Erstwhile Section 129 of ITA 1961]</i>	2.439
245.	Faceless jurisdiction of income-tax authorities. <i>[Erstwhile Section 130 of ITA 1961]</i>	2.439
<i>B.-Powers</i>		
246.	Power regarding discovery, production of evidence, etc. <i>[Erstwhile Section 131 of ITA 1961]</i>	2.440
247.	Search and seizure. <i>[Erstwhile Section 132 of ITA 1961]</i>	2.441
248.	Powers to requisition. <i>[Erstwhile Section 132A of ITA 1961]</i>	2.448
249.	Reasons not to be disclosed. <i>[Erstwhile Sections 132 & 132A of ITA 1961 merged]</i>	2.450
250.	Application of seized or requisitioned assets. <i>[Erstwhile Section 132B of ITA 1961]</i>	2.450
251.	Copying, extraction, retention and release of books of account and documents seized or requisitioned. <i>[Erstwhile Section 132(9), (9A), (9B) & (10) of ITA 1961]</i>	2.452
252.	Power to call for information. <i>[Erstwhile Section 133 of ITA 1961]</i>	2.453
253.	Powers of survey. <i>[Erstwhile Section 133A of ITA 1961]</i>	2.454
254.	Power to collect certain information. <i>[Erstwhile Section 133B of ITA 1961]</i>	2.458
255.	Power to inspect registers of companies. <i>[Erstwhile Section 134 of ITA 1961]</i>	2.458
256.	Power of certain income-tax authorities. <i>[Erstwhile Section 135 of ITA 1961]</i>	2.458
257.	Proceedings before income-tax authorities to be judicial proceedings. <i>[Erstwhile Section 136 of ITA 1961]</i>	2.459
258.	Disclosure of information relating to assesseees. <i>[Erstwhile Section 138 of ITA 1961]</i>	2.459
259.	Power to call for information by prescribed income-tax authority. <i>[Erstwhile Section 133C of ITA 1961]</i>	2.460
260.	Faceless collection of information. <i>[Erstwhile Section 135A of ITA 1961]</i>	2.460
261.	Interpretation.	2.460

CHAPTER XV
Return of Income

A.-Allotment of Permanent Account Number

262.	Permanent Account Number. <i>[Erstwhile Section 139A & 139AA of ITA 1961 merged]</i>	2.462
	<i>B.-Filing of return of income</i>	
263.	Return of income. <i>[Erstwhile Section 139, 139C & 139D of ITA 1961 merged]</i>	2.465
264.	Scheme for submission of returns through tax return preparers. <i>[Erstwhile Section 139B of ITA 1961]</i>	2.474
265.	Return by whom to be verified. <i>[Erstwhile Section 140 of ITA 1961]</i>	2.474
266.	Self-assessment. <i>[Erstwhile Section 140A of ITA 1961]</i>	2.477
267.	Tax on updated return. <i>[Erstwhile Section 140B of ITA 1961]</i>	2.479

CHAPTER XVI
Procedure for assessment

A. – Procedure for assessment

268.	Inquiry before assessment. <i>[Erstwhile Section 142 of ITA 1961]</i>	2.483
269.	Estimation of value of assets by Valuation Officer. <i>[Erstwhile Section 142A of ITA 1961]</i>	2.486
270.	Assessment. <i>[Erstwhile Section 143 of ITA 1961]</i>	2.488
271.	Best judgment assessment. <i>[Erstwhile Section 144 of ITA 1961]</i>	2.494
272.	Power of Joint Commissioner to issue directions in certain cases. <i>[Erstwhile Section 144A of ITA 1961]</i>	2.495
273.	Faceless Assessment. <i>[Erstwhile Section 144B of ITA 1961]</i>	2.495
274.	Reference to Principal Commissioner or Commissioner in certain cases. <i>[Erstwhile Section 144BA of ITA 1961]</i>	2.499
275.	Reference to Dispute Resolution Panel. <i>[Erstwhile Section 144C of ITA 1961]</i>	2.502
276.	Method of accounting. <i>[Erstwhile Section 145 of ITA 1961]</i>	2.504
277.	Method of accounting in certain cases. <i>[Erstwhile Section 145A of ITA 1961]</i>	2.506
278.	Taxability of certain income. <i>[Erstwhile Section 145B of ITA 1961]</i>	2.507

279.	Income escaping assessment. <i>[Erstwhile Section 147 of ITA 1961]</i>	2.507
280.	Issue of notice where income has escaped assessment. <i>[Erstwhile Section 148 of ITA 1961]</i>	2.513
281.	Procedure before issuance of notice under section 280. <i>[Erstwhile Section 148A of ITA 1961]</i>	2.519
282.	Time limit for notices under sections 280 and 281. <i>[Erstwhile Section 149 of ITA 1961]</i>	2.521
283.	Provision for cases where assessment is in pursuance of an order on appeal, etc. <i>[Erstwhile Section 150 of ITA 1961]</i>	2.522
284.	Sanction for issue of notice. <i>[Erstwhile Section 151 of ITA 1961]</i>	2.523
285.	Other provisions. <i>[Erstwhile Section 152 of ITA 1961]</i>	2.523
286.	Time limit for completion of assessment, reassessment and recomputation. <i>[Erstwhile Section 153 of ITA 1961]</i>	2.524
287.	Rectification of mistake. <i>[Erstwhile Section 154 of ITA 1961]</i>	2.530
288.	Other amendments. <i>[Erstwhile Section 155 of ITA 1961]</i>	2.532
289.	Notice of demand. <i>[Erstwhile Section 156 of ITA 1961]</i>	2.540
290.	Modification and revision of notice in certain cases. <i>[Erstwhile Section 156A of ITA 1961]</i>	2.541
291.	Intimation of loss. <i>[Erstwhile Section 157 of ITA 1961]</i>	2.542
	<i>B. – Special procedure for assessment of search cases</i>	
292.	Assessment of total undisclosed income as a result of search. <i>[Erstwhile Section 158BA of ITA 1961]</i>	2.542
293.	Computation of total undisclosed income of block period. <i>[Erstwhile Section 158BB of ITA 1961]</i>	2.543
294.	Procedure for block assessment. <i>[Erstwhile Section 158BC of ITA 1961]</i>	2.545
295.	Undisclosed income of any other person. <i>[Erstwhile Section 158BD of ITA 1961]</i>	2.547
296.	Time-limit for completion of block assessment. <i>[Erstwhile Section 158BE of ITA 1961]</i>	2.548
297.	Certain interests and penalties not to be levied or imposed. <i>[Erstwhile Section 158BF of ITA 1961]</i>	2.550
298.	Levy of interest and penalty in certain cases. <i>[Erstwhile Section 158BFA of ITA 1961]</i>	2.550

Income-tax Act, 2025	Contents
299. Authority competent to make assessment of block period. <i>[Erstwhile Section 158BG of ITA 1961]</i>	2.552
300. Application of other provisions of Act. <i>[Erstwhile Section 158BH of ITA 1961]</i>	2.553
301. Interpretation. <i>[Erstwhile Section 158B of ITA 1961]</i>	2.553
CHAPTER XVII	
Special provisions relating to certain persons	
<i>A.-Association of persons, firm, Hindu undivided family, etc.</i>	
<i>1.-Legal representatives</i>	
302. Legal representative. <i>[Erstwhile Section 159 of ITA 1961]</i>	2.554
<i>2. – Representative assesseees – General provisions</i>	
303. Representative assessee. <i>[Erstwhile Section 160 of ITA 1961]</i>	2.555
304. Liability of representative assessee. <i>[Erstwhile Sections 161, 165, 166 & 167 of ITA 1961 merged]</i>	2.557
305. Right of representative assessee to recover tax paid. <i>[Erstwhile Section 162 of ITA 1961]</i>	2.558
<i>3. -Representative assesseees-Special cases</i>	
306. Who may be regarded as agent. <i>[Erstwhile Section 163 of ITA 1961]</i>	2.559
307. Charge of tax where share of beneficiaries unknown. <i>[Erstwhile Section 164(1) of ITA 1961]</i>	2.560
308. Charge of tax in case of oral trust. <i>[Erstwhile Section 164A of ITA 1961]</i>	2.562
<i>4. -Association of persons and body of individuals</i>	
309. Method of computing a member's share in income of association of persons or body of individuals. <i>[Erstwhile Section 67A of ITA 1961]</i>	2.562
310. Share of member of association of persons or body of individuals in income of association or body. <i>[Erstwhile Section 86 of ITA 1961]</i>	2.563
311. Charge of tax where shares of members in association of persons or body of individuals unknown, etc. <i>[Erstwhile Section 167B of ITA 1961]</i>	2.563
<i>5. -Executors</i>	
312. Executor. <i>[Erstwhile Sections 168 & 169 of ITA 1961 merged]</i>	2.564
<i>6. -Succession to business or profession</i>	
313. Succession to business or profession otherwise than on death. <i>[Erstwhile Section 170 of ITA 1961]</i>	2.565

314.	Effect of order of tribunal or court in respect of business reorganisation. <i>[Erstwhile Section 170A of ITA 1961]</i>	2.567
	<i>7. – Partition</i>	
315.	Assessment after partition of Hindu undivided family. <i>[Erstwhile Section 171 of ITA 1961]</i>	2.567
	<i>8. -Profits of non-residents from occasional shipping business</i>	
316.	Shipping business of non-residents. <i>[Erstwhile Section 172 of ITA 1961]</i>	2.569
	<i>9. – Persons leaving India</i>	
317.	Assessment of persons leaving India. <i>[Erstwhile Section 174 of ITA 1961]</i>	2.571
	<i>10. -Association of Persons or Body of Individuals or Artificial Juridical Person formed for a particular event or purpose</i>	
318.	Assessment of association of persons or body of individuals or artificial juridical person formed for a particular event or purpose. <i>[Erstwhile Section 174A of ITA 1961]</i>	2.572
	<i>11. -Persons trying to alienate their assets</i>	
319.	Assessment of persons likely to transfer property to avoid tax. <i>[Erstwhile Section 175 of ITA 1961]</i>	2.572
	<i>12. -Discontinuance of business, or dissolution</i>	
320.	Discontinued business. <i>[Erstwhile Section 176 of ITA 1961]</i>	2.572
321.	Association dissolved or business discontinued. <i>[Erstwhile Section 177 of ITA 1961]</i>	2.573
322.	Company in liquidation. <i>[Erstwhile Section 178 of ITA 1961]</i>	2.574
	<i>13.-Private companies</i>	
323.	Liability of directors of private company. <i>[Erstwhile Section 179 of ITA 1961]</i>	2.575
	<i>14.-Assessment of firms</i>	
324.	Charge of tax in case of a firm. <i>[Erstwhile Section 167A of ITA 1961]</i>	2.577
325.	Assessment as a firm. <i>[Erstwhile Section 184 of ITA 1961]</i>	2.577
326.	Assessment when section 325 not complied with. <i>[Erstwhile Section 185 of ITA 1961]</i>	2.578
	<i>15.-Change in constitution, succession and dissolution</i>	
327.	Change in constitution of a firm. <i>[Erstwhile Section 187 of ITA 1961]</i>	2.578
328.	Succession of one firm by another firm. <i>[Erstwhile Section 188 of ITA 1961]</i>	2.579

Income-tax Act, 2025	Contents
329. Joint and several liability of partners for tax payable by firm. <i>[Erstwhile Section 188A of ITA 1961]</i>	2.579
330. Firm dissolved or business discontinued. <i>[Erstwhile Section 189 of ITA 1961]</i>	2.579
<i>16.-Liability of partners of limited liability partnership in liquidation</i>	
331. Liability of partners of limited liability partnership in liquidation. <i>[Erstwhile Section 167C of ITA 1961]</i>	2.580
<i>B. -Special provisions for registered non-profit organisation</i>	
<i>1. -Registration</i>	
332. Application for registration. <i>[Erstwhile Section 12A(1)(ac) of ITA 1961]</i>	2.581
333. Switching over of regimes. <i>[Erstwhile Section 11(7) of ITA 1961]</i>	2.585
<i>2. -Income of registered non-profit organisation</i>	
334. Tax on income of registered non-profit organisation. <i>[Erstwhile Sections 115BBC, 115BBI & 164(2) of ITA 1961]</i>	2.585
335. Regular income.	2.585
336. Taxable regular income. <i>[Erstwhile Sections 11(1)(a) & 11(1)(b) of ITA 1961 merged]</i>	2.586
337. Specified income. <i>[Erstwhile Sections 115BBC, 115BBI of ITA 1961]</i>	2.586
338. Income not to be included in regular income.	2.589
339. Corpus donation. <i>[Erstwhile Section 11(1)(d) of ITA 1961]</i>	2.589
340. Deemed corpus donation. <i>[Erstwhile Explanation 3A under Section 11(1) of ITA 1961]</i>	2.589
341. Application of income.	2.589
342. Accumulated income.	2.592
343. Deemed accumulated income.	2.593
<i>3. -Commercial activities by registered non-profit organisation</i>	
344. Business undertaking held as property. <i>[Erstwhile Section 11(4) of ITA 1961]</i>	2.593
345. Restriction on commercial activities by a registered non-profit organisation. <i>[Erstwhile Section 11(4A) of ITA 1961]</i>	2.593
346. Restriction on commercial activities by registered non-profit organisation, carrying out advancement of any other object of general public utility. <i>[Erstwhile Section 2(15) (Proviso) and 13(8) of ITA 1961 merged]</i>	2.593
<i>4. -Compliances</i>	
347. Books of account. <i>[Erstwhile Section 12A(1)(b)(i) of ITA 1961]</i>	2.594

348.	Audit. <i>[Erstwhile Section 12A(1)(b)(ii) of ITA 1961]</i>	2.594
349.	Return of income. <i>[Erstwhile Section 12A(1)(ba) of ITA 1961]</i>	2.594
350.	Permitted modes of investment. <i>[Erstwhile Section 11(5) and 13(1)(d) of ITA 1961]</i>	2.594
	5. -Violations	
351.	Specified violation.	2.594
352.	Tax on accreted income. <i>[Erstwhile Sections 115TD, 115TE & 115TF of ITA 1961 merged]</i>	2.596
353.	Other violations. <i>[Erstwhile Section 13(10), 13(11) of ITA 1961]</i>	2.601
	6. -Approval for purpose of deduction under section 133(1)(b)(ii)	
354.	Application for approval for purpose of section 133(1)(b)(ii).	2.602
354A.	Merger of registered non-profit organisation in certain cases. 7. -Interpretation	2.605
355.	Interpretation.	2.605

CHAPTER XVIII

Appeals, revisions and alternate dispute resolutions

A.-Appeals

1. -Appeals to Joint Commissioner (Appeals) and Commissioner (Appeals)

356.	Appealable orders before Joint Commissioner (Appeals). <i>[Erstwhile Section 246 of ITA 1961]</i>	2.614
357.	Appealable orders before Commissioner (Appeals). <i>[Erstwhile Section 246A of ITA 1961]</i>	2.615
358.	Form of appeal and limitation. <i>[Erstwhile Section 249 of ITA 1961]</i>	2.617
359.	Procedure in appeal. <i>[Erstwhile Section 250 of ITA 1961]</i>	2.618
360.	Powers of Joint Commissioner (Appeals) or Commissioner (Appeals). <i>[Erstwhile Section 251 of ITA 1961]</i>	2.619
	2.-Appeals to Appellate Tribunal	
361.	Appellate Tribunal. <i>[Erstwhile Sections 252 & 252A of ITA 1961 merged]</i>	2.620
362.	Appeals to Appellate Tribunal. <i>[Erstwhile Section 253 of ITA 1961]</i>	2.621
363.	Orders of Appellate Tribunal. <i>[Erstwhile Section 254 of ITA 1961]</i>	2.623
364.	Procedure of Appellate Tribunal. <i>[Erstwhile Section 255 of ITA 1961]</i>	2.628

	Contents
<i>3. -Appeals to High Court</i>	
365. Appeal to High Court. <i>[Erstwhile Section 260A of ITA 1961]</i>	2.629
366. Case before High Court to be heard by not less than two Judges. <i>[Erstwhile Section 260B of ITA 1961]</i>	2.631
<i>4. -Appeals to Supreme Court</i>	
367. Appeal to Supreme Court. <i>[Erstwhile Section 261 of ITA 1961]</i>	2.632
368. Hearing before Supreme Court. <i>[Erstwhile Section 262 of ITA 1961]</i>	2.632
<i>5. -General</i>	
369. Tax to be paid irrespective of appeal, etc. <i>[Erstwhile Section 265 of ITA 1961]</i>	2.632
370. Execution for costs awarded by Supreme Court. <i>[Erstwhile Section 266 of ITA 1961]</i>	2.632
371. Amendment of assessment on appeal. <i>[Erstwhile Section 267 of ITA 1961]</i>	2.632
372. Exclusion of time taken for copy. <i>[Erstwhile Section 268 of ITA 1961]</i>	2.633
373. Filing of appeal by income-tax authority. <i>[Erstwhile Section 268A of ITA 1961]</i>	2.633
374. Interpretation of "High Court." <i>[Erstwhile Section 269 of ITA 1961]</i>	2.634
<i>B.-Special provisions for avoiding repetitive appeals</i>	
375. Procedure when assessee claims identical question of law is pending before High Court or Supreme Court. <i>[Erstwhile Section 158A of ITA 1961]</i>	2.634
376. Procedure where an identical question of law is pending before High Courts or Supreme Court. <i>[Erstwhile Section 158AB of ITA 1961]</i>	2.636
<i>C. -Revision by the Principal Chief Commissioner or Chief Commissioner or Principal Commissioner or Commissioner</i>	
377. Revision of orders prejudicial to revenue. <i>[Erstwhile Section 263 of ITA 1961]</i>	2.637
378. Revision of other orders. <i>[Erstwhile Section 264 of ITA 1961]</i>	2.643
<i>D. -Alternate Dispute Resolutions</i>	
<i>1.-Dispute Resolution Committee in certain cases</i>	
379. Dispute Resolution Committee. <i>[Erstwhile Section 245MA of ITA 1961]</i>	2.646
<i>2.-Advance rulings</i>	
380. Interpretation. <i>[Erstwhile Section 245N of ITA 1961]</i>	2.647

381.	Board for Advance Rulings. <i>[Erstwhile Section 245-OB of ITA 1961]</i>	2.649
382.	Vacancies, etc., not to invalidate proceedings. <i>[Erstwhile Section 245P of ITA 1961]</i>	2.649
383.	Application for advance ruling. <i>[Erstwhile Section 245Q of ITA 1961]</i>	2.649
384.	Procedure on receipt of application. <i>[Erstwhile Section 245R of ITA 1961]</i>	2.649
385.	Appellate authority not to proceed in certain cases. <i>[Erstwhile Section 245RR of ITA 1961]</i>	2.651
386.	Advance ruling to be void in certain circumstances. <i>[Erstwhile Section 245T of ITA 1961]</i>	2.651
387.	Powers of the Board for Advance Rulings. <i>[Erstwhile Section 245U of ITA 1961]</i>	2.652
388.	Procedure of Board for Advance Rulings. <i>[Erstwhile Section 245V of ITA 1961]</i>	2.652
389.	Appeal. <i>[Erstwhile Section 245W of ITA 1961]</i>	2.652
CHAPTER XIX		
Collection and recovery of tax		
<i>A.-General</i>		
390.	Deduction or collection at source and advance payment. <i>[Erstwhile Sections 190, 199 & 202 of ITA 1961 merged]</i>	2.652
391.	Direct payment. <i>[Erstwhile Section 191 of ITA 1961]</i>	2.654
<i>B.-Deduction and collection at source</i>		
392.	Salary and accumulated balance due to an employee. <i>[Erstwhile Section 192, 192A of ITA 1961 merged]</i>	2.654
393.	Tax to be deducted at source [all erstwhile sections of TDS (except s. 192 & 192A), 196, 197A & 195 merged].	2.658
394.	Collection of tax at source. <i>[Erstwhile Section 206C of ITA 1961]</i>	2.698
395.	Certificates. <i>[Erstwhile Sections 197, 206C(9), 203 & 206C(5) of IT Act 2025 merged]</i>	2.702
396.	Tax deducted is income received. <i>[Erstwhile Section 198 of ITA 1961]</i>	2.704
397.	Compliance and reporting. <i>[Erstwhile s. 203A, 206CA]</i>	2.704
398.	Consequences of failure to deduct or pay or, collect or pay. <i>[Erstwhile Sections 201 & 206C of ITA 1961 merged]</i>	2.708
399.	Processing. <i>[Erstwhile Sections 200A & 206CB of ITA 1961 merged]</i>	2.711

Income-tax Act, 2025	Contents
400. Power of Central Government to relax provisions of this Chapter.	2.712
401. Bar against direct demand on assessee. <i>[Erstwhile Section 205 of ITA 1961]</i>	2.713
402. Interpretation.	2.713
<i>C.-Advance payment of tax</i>	
403. Liability for payment of advance tax. <i>[Erstwhile Section 207 of ITA 1961]</i>	2.722
404. Conditions of liability to pay advance tax. <i>[Erstwhile Section 208 of ITA 1961]</i>	2.722
405. Computation of advance tax. <i>[Erstwhile Section 209 of ITA 1961]</i>	2.722
406. Payment of advance tax by assessee on his own accord. <i>[Erstwhile Section 210 of ITA 1961]</i>	2.723
407. Payment of advance tax by assessee in pursuance of order of Assessing Officer. <i>[Erstwhile Section 210 of ITA 1961]</i>	2.723
408. Instalments of advance tax and due dates. <i>[Erstwhile Section 211 of ITA 1961]</i>	2.725
409. When assessee is deemed to be in default. <i>[Erstwhile Section 218 of ITA 1961]</i>	2.725
410. Credit for advance tax. <i>[Erstwhile Section 219 of ITA 1961]</i>	2.726
<i>D.-Collection and Recovery</i>	
411. When tax payable and when assessee deemed in default. <i>[Erstwhile Section 220 of ITA 1961]</i>	2.726
412. Penalty payable when tax in default. <i>[Erstwhile Section 221 of ITA 1961]</i>	2.731
413. Certificate by Tax Recovery Officer and validity thereof. <i>[Erstwhile Sections 222 & 224 of ITA 1961 merged]</i>	2.731
414. Tax Recovery Officer by whom recovery is to be effected. <i>[Erstwhile Section 223 of ITA 1961]</i>	2.733
415. Stay of proceedings in pursuance of certificate and amendment or cancellation thereof. <i>[Erstwhile Section 225 of ITA 1961]</i>	2.734
416. Other modes of recovery. <i>[Erstwhile Section 226 of ITA 1961]</i>	2.734
417. Recovery through State Government. <i>[Erstwhile Section 227 of ITA 1961]</i>	2.737
418. Recovery of tax in pursuance of agreements with foreign countries. <i>[Erstwhile Section 228A of ITA 1961]</i>	2.737
419. Recovery of penalties, fine, interest and other sums. <i>[Erstwhile Section 229 of ITA 1961]</i>	2.738

420.	Tax clearance certificate. <i>[Erstwhile Section 230 of ITA 1961]</i>	2.738
421.	Recovery by suit or under other law not affected. <i>[Erstwhile Section 232 of ITA 1961]</i>	2.740
422.	Recovery of tax arrear in respect of non-resident from his assets. <i>[Erstwhile Section 173 of ITA 1961]</i>	2.740
	<i>E.-Interest chargeable in certain cases</i>	
423.	Interest for defaults in furnishing return of income. <i>[Erstwhile Section 234A of ITA 1961]</i>	2.741
424.	Interest for defaults in payment of advance tax. <i>[Erstwhile Section 234B of ITA 1961]</i>	2.745
425.	Interest for deferment of advance tax. <i>[Erstwhile Section 234C of ITA 1961]</i>	2.748
426.	Interest on excess refund. <i>[Erstwhile Section 234D of ITA 1961]</i>	2.750
	<i>F.-Levy of fee in certain cases</i>	
427.	Fee for default in furnishing statements. <i>[Erstwhile Section 234E of ITA 1961]</i>	2.751
428.	Fee for default in furnishing return of income, audited accounts and reports. <i>[Erstwhile Section 234F of ITA 1961]</i>	2.751
429.	Fee for default relating to statement or certificate. <i>[Erstwhile Section 234G of ITA 1961]</i>	2.752
430.	Fee for default relating to intimation of Aadhaar number. <i>[Erstwhile Section 234H of ITA 1961]</i>	2.753
CHAPTER XX		
Refunds		
431.	Refunds. <i>[Erstwhile Section 237 of ITA 1961]</i>	2.753
432.	Person entitled to claim refund in certain special cases. <i>[Erstwhile Section 238 of ITA 1961]</i>	2.753
433.	Form of claim for refund and limitation. <i>[Erstwhile Section 239 of ITA 1961]</i>	2.753
434.	Refund for denying liability to deduct tax in certain cases. <i>[Erstwhile Section 239A of ITA 1961]</i>	2.754
435.	Refund on appeal, etc. <i>[Erstwhile Section 240 of ITA 1961]</i>	2.754
436.	Correctness of assessment not to be questioned. <i>[Erstwhile Section 242 of ITA 1961]</i>	2.755
437.	Interest on refunds. <i>[Erstwhile Section 244A of ITA 1961]</i>	2.755

438.	Set off and withholding of refunds in certain cases. <i>[Erstwhile Section 245 of ITA 1961]</i>	2.758
CHAPTER XXI		
Penalties		
439.	Penalty for under-reporting and misreporting of income. <i>[Erstwhile Section 270A of ITA 1961]</i>	2.759
440.	[Waiver of penalty and immunity from prosecution.] <i>[Erstwhile Section 270AA of ITA 1961]</i>	2.764
441.	Failure to keep, maintain or retain books of account, documents, etc. <i>[Erstwhile Section 271A of ITA 1961]</i>	2.765
442.	Penalty for failure to keep and maintain information and document, etc., in respect of certain transactions. <i>[Erstwhile Section 271AA of ITA 1961]</i>	2.765
443.	[***]	2.766
444.	Penalty for false entry, etc., in books of account. <i>[Erstwhile Section 271AAD of ITA 1961]</i>	2.766
445.	Benefits to related persons. <i>[Erstwhile Section 271AAE of ITA 1961]</i>	2.767
446.	Penalty for failure to furnish information or for furnishing inaccurate information on transaction of crypto-asset. <i>[Erstwhile Section 271B of ITA 1961]</i>	2.767
447.	[***]	2.768
448.	Penalty for failure to deduct tax at source. <i>[Erstwhile Section 271C of ITA 1961]</i>	2.768
449.	Penalty for failure to collect tax at source. <i>[Erstwhile Section 271CA of ITA 1961]</i>	2.768
450.	Penalty for failure to comply with provisions of section 185. <i>[Erstwhile Section 271D of ITA 1961]</i>	2.768
451.	Penalty for failure to comply with provisions of section 186. <i>[Erstwhile Section 271DA of ITA 1961]</i>	2.769
452.	Penalty for failure to comply with provisions of section 187. <i>[Erstwhile Section 271DB of ITA 1961]</i>	2.770
453.	Penalty for failure to comply with provisions of section 188. <i>[Erstwhile Section 271E of ITA 1961]</i>	2.770
454.	Penalty for failure to furnish statement of financial transaction or reportable account after a notice. <i>[Erstwhile Section 271FA of ITA 1961]</i>	2.770
455.	Penalty for furnishing inaccurate statement of financial transaction or reportable account. <i>[Erstwhile Section 271FAA of ITA 1961]</i>	2.771
456.	Penalty for failure to furnish statement or information or document by an eligible investment fund. <i>[Erstwhile Section 271FAB]</i>	2.771

457.	Penalty for failure to furnish information or document under section 171. <i>[Erstwhile Section 271G of ITA 1961]</i>	2.771
458.	Penalty for failure to furnish information or document under section 506. <i>[Erstwhile Section 271GA of ITA 1961]</i>	2.772
459.	Penalty for failure to furnish report or for furnishing inaccurate report under section 511. <i>[Erstwhile Section 271GB of ITA 1961]</i>	2.772
460.	Penalty for failure to submit statement under section 505. <i>[Erstwhile Section 271GC of ITA 1961]</i>	2.773
461.	Penalty for failure to furnish statements, etc. <i>[Erstwhile Section 271H of ITA 1961]</i>	2.773
462.	Penalty for failure to furnish information or furnishing inaccurate information under section 397(3)(d). <i>[Erstwhile Section 271-I of ITA 1961]</i>	2.773
463.	Penalty for furnishing incorrect information in reports or certificates. <i>[Erstwhile Section 271] of ITA 1961]</i>	2.773
464.	Penalty for failure to furnish statements, etc. <i>[Erstwhile Section 271K of ITA 1961]</i>	2.774
465.	Penalty for failure to answer questions, sign statements, furnish information, returns or statements, allow inspections, etc. <i>[Erstwhile Section 272A of ITA 1961]</i>	2.774
466.	Penalty for failure to comply with the provisions of section 254. <i>[Erstwhile Section 272AA of ITA 1961]</i>	2.776
467.	Penalty for failure to comply with the provisions of [section 262 and 397]. <i>[Erstwhile Section 272B of ITA 1961]</i>	2.776
468.	Penalty for failure to comply with the provisions of section 397. <i>[Erstwhile Section 272BB of ITA 1961]</i>	2.776
469.	Power to reduce or waive penalty, etc., in certain cases. <i>[Erstwhile Section 273A of ITA 1961]</i>	2.777
470.	Penalty not to be imposed in certain cases. <i>[Erstwhile Section 273B of ITA 1961]</i>	2.778
471.	Procedure. <i>[Erstwhile Section 274 of ITA 1961]</i>	2.778
472.	Bar of limitation for imposing penalties. <i>[Erstwhile Section 275 of ITA 1961]</i>	2.779

CHAPTER XXII
Offences and Prosecution

473.	[Contravention of order made during search action.] <i>[Erstwhile Section 275A of ITA 1961]</i>	2.780
474.	[Failure to afford facility for inspection of books of account during search.] <i>[Erstwhile Section 275B of ITA 1961]</i>	2.780

475.	Removal, concealment, transfer or delivery of property to prevent tax recovery. <i>[Erstwhile Section 276 of ITA 1961]</i>	2.781
476.	Failure to pay tax to credit of Central Government under Chapter XIX-B. <i>[Erstwhile Section 276B of ITA 1961]</i>	2.781
477.	Failure to pay tax collected at source. <i>[Erstwhile Section 276BB of ITA 1961]</i>	2.782
478.	Wilful attempt to evade tax, etc. <i>[Erstwhile Section 276C of ITA 1961]</i>	2.783
479.	Failure to furnish returns of income. <i>[Erstwhile Section 276CC of ITA 1961]</i>	2.785
480.	Failure to furnish return of income setting forth undisclosed income. <i>[Erstwhile Section 276CCC of ITA 1961]</i>	2.786
481.	Failure to comply with a direction of special audit or valuation. <i>[Erstwhile Section 276D of ITA 1961]</i>	2.787
482.	False statement in verification, etc. <i>[Erstwhile Section 277 of ITA 1961]</i>	2.787
483.	Falsification of books of account or document, etc. <i>[Erstwhile Section 277A of ITA 1961]</i>	2.787
484.	Abetment of false return, etc. <i>[Erstwhile Section 278 of ITA 1961]</i>	2.788
485.	Punishment for second and subsequent offences. <i>[Erstwhile Section 278A of ITA 1961]</i>	2.788
486.	Punishment not to be imposed in certain cases. <i>[Erstwhile Section 278AA of ITA 1961]</i>	2.789
487.	Offences by companies. <i>[Erstwhile Section 278B of ITA 1961]</i>	2.789
488.	Offences by Hindu undivided family. <i>[Erstwhile Section 278C of ITA 1961]</i>	2.790
489.	Presumption as to assets, books of account, etc., in certain cases. <i>[Erstwhile Section 278D of ITA 1961]</i>	2.790
490.	Presumption as to culpable mental state. <i>[Erstwhile Section 278E of ITA 1961]</i>	2.791
491.	Prosecution to be at instance of Principal Chief Commissioner or Chief Commissioner or Principal Commissioner or Commissioner. <i>[Erstwhile Section 279 of ITA 1961]</i>	2.791
492.	Certain offences to be non-cognizable. <i>[Erstwhile Section 279A of ITA 1961]</i>	2.792
493.	Proof of entries in records or documents. <i>[Erstwhile Section 279B of ITA 1961]</i>	2.792
494.	Disclosure of particulars by public servants. <i>[Erstwhile Section 280 of ITA 1961]</i>	2.792

495.	Special Courts. <i>[Erstwhile Section 280A of ITA 1961]</i>	2.793
496.	Offences triable by Special Court. <i>[Erstwhile Section 280B of ITA 1961]</i>	2.793
497.	Trial of offences as summons case. <i>[Erstwhile Section 280C of ITA 1961]</i>	2.793
498.	Application of Bharatiya Nagarik Suraksha Sanhita, 2023 to proceedings before Special Court. <i>[Erstwhile Section 280D of ITA 1961]</i>	2.794
CHAPTER XXIII		
Miscellaneous		
499.	Certain transfers to be void. <i>[Erstwhile Section 281 of ITA 1961]</i>	2.794
500.	Provisional attachment to protect revenue in certain cases. <i>[Erstwhile Section 281B of ITA 1961]</i>	2.795
501.	Service of notice, generally. <i>[Erstwhile Section 282 of ITA 1961]</i>	2.796
502.	Authentication of notices and other documents. <i>[Erstwhile Section 282A of ITA 1961]</i>	2.797
503.	Service of notice when family is disrupted or firm etc., is dissolved. <i>[Erstwhile Section 283 of ITA 1961]</i>	2.798
504.	Service of notice in case of discontinued business. <i>[Erstwhile Section 284 of ITA 1961]</i>	2.798
505.	Submission of statement by a non-resident having liaison office. <i>[Erstwhile Section 285 of ITA 1961]</i>	2.798
506.	Furnishing of information or documents by an Indian concern in certain cases. <i>[Erstwhile Section 285A of ITA 1961]</i>	2.799
507.	Submission of statements by producers of cinematograph films or persons engaged in specified activity. <i>[Erstwhile Section 285B of ITA 1961]</i>	2.799
508.	Obligation to furnish statement of financial transaction or reportable account. <i>[Erstwhile Section 285BA of ITA 1961]</i>	2.799
509.	Obligation to furnish information on transaction of crypto-asset. <i>[Erstwhile Section 285BBA of ITA 1961]</i>	2.801
510.	Annual information statement. <i>[Erstwhile Section 285BB of ITA 1961]</i>	2.802
511.	Furnishing of report in respect of international group. <i>[Erstwhile Section 286 of ITA 1961]</i>	2.802
512.	Publication of information respecting assesseees in certain cases. <i>[Erstwhile Section 287 of ITA 1961]</i>	2.807

Income-tax Act, 2025	Contents
513. Appearance by registered valuer in certain matters. <i>[Erstwhile Section 287A of ITA 1961]</i>	2.807
514. Registration of valuers.	2.807
515. Appearance by authorised representative. <i>[Erstwhile Section 288 of ITA 1961]</i>	2.808
516. Rounding off of amount of total income, or amount payable or refundable. <i>[Erstwhile Section 288A, 288B of ITA 1961]</i>	2.811
517. Receipt to be given. <i>[Erstwhile Section 289 of ITA 1961]</i>	2.811
518. Indemnity. <i>[Erstwhile Section 290 of ITA 1961]</i>	2.811
519. Power to tender immunity from prosecution. <i>[Erstwhile Section 291 of ITA 1961]</i>	2.811
520. Cognizance of offences. <i>[Erstwhile Section 292 of ITA 1961]</i>	2.812
521. Probation of Offenders Act, 1958 and section 401 of Bharatiya Nagarik Suraksha Sanhita, 2023, not to apply. <i>[Erstwhile Section 292A of ITA 1961]</i>	2.812
522. Circumstances in which return of income, assessment, approvals, etc., not to be invalid <i>[Erstwhile Section 292B of ITA 1961]</i>	2.812
523. Notice deemed to be valid in certain circumstances. <i>[Erstwhile Section 292BB of ITA 1961]</i>	2.814
524. Presumption as to assets, books of account, etc. <i>[Erstwhile Section 292C of ITA 1961]</i>	2.814
525. Authorisation and assessment in case of search or requisition. <i>[Erstwhile Section 292CC of ITA 1961]</i>	2.815
526. Bar of suits in civil courts. <i>[Erstwhile Section 293 of ITA 1961]</i>	2.815
527. Power to make exemption, etc., in relation to participation in business of prospecting for, extraction, etc., of mineral oils. <i>[Erstwhile Section 293A of ITA 1961]</i>	2.815
528. Power of Central Government or Board to condone delays in obtaining approval. <i>[Erstwhile Section 293B of ITA 1961]</i>	2.816
529. Power to withdraw approval. <i>[Erstwhile Section 293C of ITA 1961]</i>	2.816
530. Act to have effect pending legislative provision for charge of tax. <i>[Erstwhile Section 294 of ITA 1961]</i>	2.816
531. Power to rescind exemption in relation to certain Union territories already granted under section 294A of the Income-tax Act, 1961. <i>[Erstwhile Section 294A, Power to make exemption in relation to certain Union</i>	2.816

	<i>territories]</i>	
532.	Power to frame schemes. <i>[Section to substitute erstwhile sections 142B, 151A, 157A, 231, 264A, 264B & 293D merged]</i>	2.817
533.	Power to make rules. <i>[Erstwhile Section 295 of ITA 1961]</i>	2.817
534.	Laying before Parliament. <i>[Erstwhile Section 296 of ITA 1961]</i>	2.820
535.	Removal of difficulties. <i>[Erstwhile Section 298 of ITA 1961]</i>	2.820
536.	Repeal and savings. <i>[Erstwhile Section 297 of ITA 1961]</i>	2.820
	SCHEDULE I	2.826
	SCHEDULE II	2.829
	SCHEDULE III	2.840
	SCHEDULE IV	2.863
	SCHEDULE V	2.873
	SCHEDULE VI	2.883
	SCHEDULE VII	2.891
	SCHEDULE VIII	2.903
	SCHEDULE IX	2.905
	SCHEDULE X	2.909
	SCHEDULE XI <i>[Erstwhile Sch. IV of ITA 1961]</i>	2.913
	SCHEDULE XII <i>[Erstwhile Sch. VII of ITA 1961]</i>	2.924
	SCHEDULE XIII <i>[Erstwhile Sch. XI of ITA 1961]</i>	2.927
	SCHEDULE XIV <i>[Erstwhile Sch. I of ITA 1961]</i>	2.928
	SCHEDULE XV	2.930
	SCHEDULE XVI	2.940
	<i>Appendix 1 (Relevant Circulars)</i>	3.1
	<i>Appendix 2 The Direct Tax Vivad Se Vishwas Scheme, 2024</i>	3.90
	<i>The Finance Act, 2026</i>	3.98
	<i>Subject Index</i>	3.199