

CHAPTER - 1

Introduction

Earlier the provisions related to exemptions were contained in section 10 of the Income-tax Act, 1961. There were around 140 clauses in said section 10, providing exemption to different persons and incomes.

Difficulties in comprehending the existing provisions

Since section 10 of the Income Tax Act, 1961 provided different exemptions therein which were in the form of clauses, there were inherent limitations in the drafting. Clause 23C of section 10 contains 15 sub-clauses with numbers such as 10(23C)(i), (ii), (iii), (iiia), (iiiaa), (iiiaaa), (iiiaaaa), (iiiaab), (iiiaac), (iiiaad), (iiiaae), (iv), (v), (vi), and (via).

Clause (23C) has 24 provisos. The 3rd proviso to clause (23C) has 7 Explanations and Explanation 2 to the 3rd proviso has again 8 provisos. Thus, there are provisos within clauses, Explanations to these provisos and again provisos to the Explanations making it difficult to comprehend the provisions.

Approach followed while considering the provisions of section 10 presently in the Income Tax Act, 1961, writing the Income Tax Act, 2025

The following approach has been followed while redrafting the provisions:

- (i) All the provisions related to exemptions have been drafted in 6 different Schedules related to specific category of taxpayers as mentioned below.
- (ii) Redundant provisions have been removed.
- (iii) Income eligible for exemption, eligible persons and the applicable conditions have been provided in different columns of the Table under each of these Schedules for the ease of understanding.

All the clauses of section 10 have been placed in 6 different schedules as follows:

Schedule II	Income such as agricultural income
Schedule III	Certain eligible persons for exemption such as partners of Firm & HUF etc.
Schedule IV	Exemption to Non-Residents
Schedule V	Exemption to Business Trusts. Sovereign Wealth Funds etc.
Schedule VI	Exemption to IFSC units
Schedule VII	Persons eligible for exemption from Tax

Provisions related to exemptions are taken to Schedules

Section 11 of the Income Tax Act, 2025 contained certain provisions relating to exemptions while the rest of the provisions contained in Section 10 of the Income Tax Act, 1961 are placed in the Schedules

Exemptions

An exemption refers to the deduction allowed by the law to reduce the amount of income that would otherwise be taxed. It is a legal deduction from the income that would otherwise be taxed for a qualifying reason.

Basic Principles - Onus of the burden of proof

- On the revenue authorities to show that the receipt constitutes income and that income is liable to tax
- A claim that a particular income is exempt from taxation lies upon the assessee

Burden of Proof – judicial precedents

Onus is on assessee to prove that income qualifies for exemption

Where however a receipt is of the nature of income, the burden of proving that it is not taxable because it falls within an exemption provided by the Act lies upon the assessee. – [*Parimisetti Seetharamamma v. CIT (1965) 57 ITR 532 (SC)*]

The law is well settled that it is for a person who claims exemption to establish it, and therefore, it was for the assessee to prove that the income sought to be taxed was agricultural income exempt from taxation. – [*CIT v. Ramakrishna Deo (1959) 35 ITR 312 (SC)*]

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Income Tax Department Cracks Down on Bogus Claims of Deductions & Exemptions

The Income Tax Department initiated a large-scale verification operation across multiple locations in the country on 14th July, 2025, targeting individuals and entities facilitating fraudulent claims of deductions and exemptions in Income Tax Returns (ITRs). This action follows a detailed analysis of the misuse of tax benefits under the Income-tax Act, 1961, often in collusion with professional intermediaries.

Investigations have uncovered organized rackets operated by certain ITR preparers and intermediaries, who have been filing returns claiming fictitious deductions and exemptions. These fraudulent filings involve the abuse of beneficial provisions, with some even submitting false TDS returns to claim excessive refunds.

To identify suspicious patterns, the Department has leveraged financial data received from third-party sources, ground-level intelligence, and advanced artificial intelligence tools. These findings are further substantiated by recent search and seizure operations conducted in Maharashtra, Tamil Nadu, Delhi, Gujarat, Punjab, and Madhya Pradesh, where evidence of fraudulent claims was found to have been used by various groups and entities.

Analysis reveals rampant misuse of deductions under sections 10(13A), 80GGC, 80E, 80D, 80EE, 80EEB, 80G, 80GGA, and 80DDB. Exemptions have been claimed without valid justification. Employees of MNCs, PSUs, Government bodies, academic institutions, and entrepreneurs are among those implicated. Taxpayers are often lured into these fraudulent schemes with promises of inflated refunds

in return for a commission. Despite a fully e-enabled tax administration system, ineffective communication remains a significant hurdle in assisting taxpayers. It has been observed that such ITR preparers often create temporary email IDs solely for filing bulk returns, which are later abandoned, resulting in official notices going unread.

In line with its guiding principle of 'Trust Taxpayers First', the Department has emphasized voluntary compliance. Over the past year, the Department has carried out extensive outreach efforts, including SMS and email advisories, nudging suspected taxpayers to revise their returns and pay the correct tax. Physical outreach programs, both on and off campus, have also been conducted. As a result, approximately 40,000 taxpayers have updated their returns in the last four months, voluntarily withdrawing false claims amounting to ₹ 1,045 crore. However, many remain non-compliant, possibly under the influence of the masterminds behind these evasion rackets.

The Department is now poised to take stern action against continued fraudulent claims, including penalties and prosecution wherever applicable. The ongoing verification exercise across 150 premises is expected to yield crucial evidence, including digital records, that will aid in dismantling the networks behind these schemes and ensure accountability under the law.

Further investigations are currently underway.

Taxpayers are again advised to file correct particulars of their income and communication coordinates and not be influenced by advice from unauthorized agents or intermediaries promising undue refunds.

V. Rajitha
Commissioner of Income Tax
(Media & Technical Policy) &
Official Spokesperson, CBDT

Government incurred a total revenue loss of over Rs. 13.71 lakh Cr. on account of tax exemptions, deductions, and incentives under direct taxes from Financial year 2019-20 to Financial year 2023-24

In response to a batch of questions from Lok Sabha Members [UNSTARRED QUESTION NO. 1184 ANSWERED ON 28.07.2025], the Minister of States in the Ministry of Finance Shri Pankaj Chaudhary shares the details w.r.t. Revenue loss on account of tax exemptions, deductions and incentives in respect of Direct and Indirect Taxes; The Minister states that from FY 2019–20 to FY 2023–24, the Government incurred a total revenue loss of over Rs. 13.71 lakh Cr. on account of tax exemptions, deductions, and incentives under direct taxes, with corporate taxpayers accounting for a significant portion; Regarding the revenue impact of tax incentives (indirect taxes), he apprises that a total of Rs. 2.5 lakh Cr. was foregone under Customs for FYs 2019-20, 2020-21, 2021-22, 2022-23 and 2023-24; On the query as to whether the Govt. has reviewed the impact of these tax incentives, Shri Chaudhary states that no such review has been carried out, while adding that phasing out the exemptions and incentives available to various taxpayers and

simplifying the tax structure is the stated policy of the Govt.; The Minister also mentions that, starting from the Finance Act, 2016, the corporate tax rates have been gradually reduced, and vide Taxation Laws (Amendment) Act, 2019, an option has been provided to corporates to pay tax at concessional rate of 22% if they do not avail specified deductions or incentives; Lastly, Shri Chaudhary highlights that “Taxation rates, exemptions and tax incentives in terms of employment generation, capital investment, wage growth, innovation or regional development are part of the overall fiscal policy of the Government which aims at holistic growth of the economy.”

Revenue Foregone from Financial years 2019-20 to 2023-24 (Direct Taxes) [In Rs. Crore]				
<i>Financial Year</i>	<i>Major Tax Incentives for Corporate Taxpayers (A)</i>	<i>Major Tax Incentives for Non-Corporate Taxpayers (Firms/AOPs/BOIs) (B)</i>	<i>Major Tax Incentives for Individual HUF Taxpayers (C)</i>	<i>Grand Total (A+B+C)</i>
2019-20	94109.83	8,043.07	1,55,429.45	2,57,582.35
2020-21	75,218.02	7,731.61	1,28,244.23	2,11,193.86
2021-22	96,892.39	9,018.68	1,68,566.30	2,74,477.37
2022-23	88,109.27	10,920.83	1,96,678.95	2,95,709.05
2023-24 (Projected)	98,999.57	12,270.64	2,20,988.47	3,32,258.68

Assessee’s inadvertent mistake of not showing capital-receipts under ‘exempt income’, no ground for disallowance

Mumbai ITAT holds that inadvertent mistake on the part of the Assessee to mention the details of exempt income in the relevant schedule of the income-tax return cannot be a ground to deny the relief, if the Assessee is found eligible, otherwise; Tribunal observes that the amount of Rs. 15,00,000 received by the Assessee was shown as ‘capital receipt’ under the head ‘business income’ in the return of income, but the same was not allowed by the Revenue on the ground that the said amount is not shown under the head ‘exempt income’; Notes Assessee’s contention that not disclosing the amount under the Schedule of ‘exempt income’ in the ITR was a *bona fide* mistake of the Assessee; Relies on Co-ordinate bench’s ruling in *Sumanchandra G. Mehta v. ITO in ITANo. 564 & 565/Mum/2012* and Bangalore ITAT’s ruling in *Goodwill Management (P) Ltd. v. DCIT in ITA No. 670/Bang./2020* wherein it was held that CBDT has powers to frame the rules but, at the same time, it cannot benefit from the ignorance of the taxpayers using the latest technology and that there is no reason why such error should not be rectified by the Assessing Officer; Thus, in view of the principles of natural justice, ITAT restores the matter with the Revenue, with the direction to allow the exemption claimed by the Assessee, if otherwise assessee is found eligible. [In favour of assessee] (Related Assessment year : 2018-19) – [Fancy Corporation Ltd. v. ACIT [TS-208-ITAT-2025(Mum)] – Date of Judgement : 25.02.2025 (ITAT Mumbai)]

Exemption Notifications to be interpreted strictly; Assessee cannot take benefit of ambiguity

5-Judge Constitution Bench of Supreme Court rules on interpretation of tax exemption provision / Notification when there is ambiguity as to its applicability w.r.t. entitlement of assessee or rate of tax to be applied; Holds that such exemption Notification should be interpreted strictly, and the burden of proving applicability would be on the assessee to show that his case comes within the parameters of the exemption clause or exemption notification"; States, When there is ambiguity in exemption notification which is subject to strict interpretation, the benefit of such ambiguity cannot be claimed by the subject/assessee and it must be interpreted in favour of the revenue"; Accordingly, rejects assessee's contention that rule of strict interpretation should be limited to eligibility conditions of an exemption Notification while conferring the benefits thereto; Noting the distinction in interpreting a taxing provision (charging provision) and an exemption Notification, Apex Court briefly reiterates the general principles of statutory interpretation and remarks, It is well accepted that a statute must be construed according to the intention of the Legislature and the Courts should act upon the true intention of the legislation while applying law and while interpreting law"; However, referring to plethora of judicial pronouncements, Supreme Court reiterates the well settled rule that in a taxing statute, one has to strictly look to language used and there is no room for searching intendment nor drawing any presumption; States, It is axiomatic that taxation statute has to be interpreted strictly because State cannot at their whims and fancies burden the citizens without authority of law"; Clarifies, while 'strict interpretation' principle cannot simply be juxtaposed with 'literal rule' inasmuch as it would result in ignoring an important aspect that is 'apparent legislative intent', one should not ignore the interplay between the two principles for strict interpretation of a statute certainly involves literal or plain meaning test; On the question of interpretation of exemption Notification, Constitution Bench refers to a catena of case laws and observes, exemptions from taxation have tendency to increase the burden on the other unexempted class of taxpayers and therefore, person claiming exemption has to establish that his case squarely falls within the exemption Notification, and while doing so, a Notification should be construed against subject in case of ambiguity; Accordingly, concurs with Constitution Bench view in *Commissioner of Central Excise, New Delhi v. Hari Chand Shri Gopal*, (2011) 1 SCC 236 case that once the ambiguity or doubt is resolved by interpreting the applicability of exemption clause strictly, the Court may construe the Notification by giving full play bestowing wider and liberal construction; Resultantly, holds that ratio in *Sun Export Corporation, Bombay v. Collector of Customs, Bombay*, (1997) 6 SCC 564 case viz. 'view favourable to assessee in matters of taxation has to be preferred' is not correct and accordingly, overrules all the decisions which took similar view. [In favour of revenue] – [*Commissioner of Customs (Import), Mumbai v. Dilip Kumar And Company & Ors* [TS-421-SC-2018] – Date of Judgement : 30.07.2018 (SC)]

Parliament has the competence to withdraw any exemption

If while legislating on a matter within its competence Parliament can grant an exemption, it is surely competent for it to withdraw that exemption in exercise

of the self-same power. By article 246(1) of the Constitution, Parliament has the exclusive power to make laws with respect to any of the matters in List I of the Seventh Schedule. Entry 82 in List I relates to “taxes on income other than agricultural income”. The Income-tax Act, 1961, and the annual Finance Acts are enacted by Parliament in exercise of the power conferred by article 246(1) read with entry 82 of List I. Once Parliament has the legislative competence to enact a law with respect to a certain subject-matter, the limits of that competence cannot be judged further by the form or manner in which that power is exercised. Accordingly, though it would be unconventional for Parliament to amend a taxing statute by incorporating the amending provision in an Act of a different pith and substance, such a course would not be unconstitutional. [In favour of revenue] (Related Assessment year : 1963-64) – [*Madurai District Central Co-operative Bank Ltd. v. Third ITO (1975) 101 ITR 24 (SC)*]

CHAPTER - 2

Incomes not included in Total Income

[Section 11]

{Corresponding to Section 10 of the Income Tax Act, 1961}

Section 11 provides for incomes not included in total income and, *inter alia*, provides for details of certain income enumerated in Schedules II, III, IV, V and VI which are not to be included in computing the total income of any person for a tax year. It also deals with certain persons enumerated in Schedule VII who are not chargeable to tax under the proposed legislation for a tax year.

Purpose:

Section 11 establishes which incomes and persons are excluded from the total taxable income under the Act, subject to specified conditions. It consolidates exemptions that were previously scattered across multiple provisions and ties them to detailed schedules.

Text of Section 11 of the Income Tax Act, 2025

11. Incomes not included in total income

- (1) *In computing the total income of any person for a tax year under this Act, any income enumerated in Schedules II, III, IV, V and VI shall not be included, subject to fulfilment of conditions specified therein.*
- (2) *Wherever the conditions referred to in the Schedules referred in sub-section (1) are not satisfied in any tax year in respect of any income enumerated in the said Schedules, such income shall be charged to tax under this Act for that tax year.*
- (3) *The persons enumerated in Schedule VII shall, subject to fulfilment of the conditions specified therein, not be chargeable to tax under this Act for a tax year.*
- (4) *Wherever the conditions referred to in Schedule VII are not satisfied in respect of the persons enumerated in the said Schedule, the income of such person shall be charged to tax under the provisions of this Act.*
- (5) *The Central Government may make rules or issue notifications for the purposes of this section as specified in the Schedules II, III, IV, V, VI and VII.*

	Schedule	Table S. No.	Corresponding section of the Income Tax Act, 1961	Income not to be included in total income
A	Incomes not to be included in total income [Section 11]			
1.	II	1	10(1)	Agricultural Income
2.	II	2	10(10D)	Any sum received under a life insurance policy, including the sum allocated by way of bonus on such policy (not being a key-man insurance policy)

3.	II	3	10(11)	Payments received from a provident fund to which the Provident Funds Act, 1925 applies, or from any other provident fund set up by the Central Government and notified by it in this behalf
4.	II	4	10(12)	Accumulated balance due and becoming payable to an employee participating in a recognized provident fund (under certain conditions)
5.	II	5	10(11A)	Any payment from any account opened as per the Sukanya Samriddhi Account Scheme, 2019
6.	II	6	10(12A)	Any payment from National Pension System Trust
7.	II	7	10(12C)	Any payment from the Agniveer Corpus Fund to a person enrolled under the Agnipath Scheme, or to his nominee
8.	II	8	10(13)	Any payment from an approved superannuation fund
9.	II	9	10(16)	Scholarships granted to meet the cost of education
10.	II	10	10(17A)	Any Awards, rewards instituted or approved by the Central/State Government for public interest
11.	II	11	10(15)(i)	Income by way of Interest, premium on redemption or other payment on securities, bonds, annuity certificates etc.
12.	II	12	10(15)(vi)	Interest on Gold Deposit Bonds
13.	II	13	10(15)(vii)	Interest income on notified bonds issued by— A local authority; or A State Pooled Finance Entity
14.	II	14	10(33)	Any income arising from the transfer of a capital asset, being a unit of the Unit Scheme, 1964 referred to in Schedule I to the Unit Trust of India (Transfer of Undertaking and Repeal) Act, 2002

15.	II	15	10(12AA)	Any payment from the National Pension System Trust received by an assessee, who is a subscriber to the Unified Pension Scheme
16.	II	16	10(15)(iii)	Interest on securities issued by the Department of the Central Bank of Ceylon
			10(15)(iv)(c)	Interest received from an industrial undertaking in India on money borrowed by it prior to 1st June, 2001 in a foreign country.
			10(15)(iv)(d)	Interest received from the specified Industrial Finance Corporation of India on money borrowed from sources outside India before 1st June, 2001.
			10(15)(iv)(e)	Interest received from other financial institution or banking company on money borrowed by it from sources outside India before 1st June, 2001 under a loan agreement approved by the Central Government.
			10(15)(iv)(f)	Interest received from an industrial undertaking in India, on money borrowed by it in foreign currency under the loan agreement approved by the Central Government before 1st June, 2001.
			10(15)(iv)(g)	Interest received from a public company, which is eligible for deduction under section 36(1) (viii). The main object of such a company should be providing of long-term housing finance.
			10(15)(iv)(h)	Interest received from public sector company in respect of notified bonds/ debenture.
			Section 10(15)(iii) or (15)(iv)(c), (15)(iv)(d), (15)(iv)(e), (15)(iv)(f), (15)(iv)(g) or (15)(iv)(h) or (36)	Any income covered under section 10(15)(iii) or (15)(iv)(c), (15)(iv)(d), (15)(iv)(e), (15)(iv)(f), (15)(iv)(g) or (15)(iv)(h) or (36) of the Income-tax Act, 1961, subject to the conditions as provided therein.

17.	III	1	10(2)	Any sum received by a member from Hindu undivided family
18.	III	2	10(2A)	Share of profit from a partnership firm – Exempt in the hands of the partners as the firm pays tax on its income
19.	III	3	10(10BC)	Any amount received or receivable from the Central Government or a State Government or a local authority by way of compensation on account of any disaster
20.	III	4	10(12B) & 10(12BA)	Partial amount paid by National Pension System Trust to an employee or guardian of a member under the pension scheme referred to in section 124
21.	III	5	10(17)(i)	Daily allowance received by any person by reason of his membership of Parliament or of any State Legislature or of any Committee thereof
22.	III	6	10(17)(ii)	Any allowance received by any person by reason of his membership of Parliament under the Members of Parliament (Constituency Allowance) Rules, 1986 made under the Salary, Allowances and Pension of Members of Parliament Act, 1954
23.	III	7	10(17)(iii)	Any constituency allowance received by any person by reason of his membership of any State Legislature under any State Act or rules made thereunder
24.	III	8	10(5)	Value of any travel concession or assistance
25.	III	9	10(7)	Any allowances or perquisites paid by the Government to its employees for rendering service outside India

26.	III	10	10(10CC)	Exemption on the income-tax paid by an employer on non-monetary benefits (perquisites) provided to an employee
27.	III	11	10(13A)	Exemption for House Rent Allowance
28.	III	12	10(14)(i)	Any special allowance or benefit to the extent to which such expenses are actually incurred for that purpose
29.	III	13	10(14)(ii)	Exemptions for allowances or benefits granted to meet personal expenses in performance of duties of office or employment or to compensate him for increased cost of living
30.	III	14	10(18)(i)	Pension received by individuals who have been awarded certain gallantry awards
31.	III	15	10(18)(ii)	Family pension received by any member of the family of an individual who has been awarded certain gallantry awards
32.	III	16	10(19)	Family pension received by family members of armed forces personnel killed in service (including paramilitary forces) of the Union.
33.	III	17	10(32)	Any income of a minor Child Clubbed under section 99(1)(d) in the parent's income (up to a specified limit)
34.	III	18	10(37)	Exemption of Capital Gain from the compulsory acquisition of urban Agricultural Land
35.	III	19	10(26)	Income of scheduled tribe members residing in certain areas
36.	III	20	10(26AAA)	Income of a "Sikkimese" individual exempt from tax subject to certain conditions

37.	III	21	10(30) & (31)	Subsidies received from or through the concerned Board by individuals growing and manufacturing tea, rubber, coffee, cardamom or such other commodity in India
38.	III	22	10(20)	Income of any local authority (such as municipalities
39.	III	23	10(21)	Exemption in respect of income of approved research associations
40.	III	24	10(23A)	Income of Professional associations or institution established in India having as its object the control, supervision, regulation or encouragement of the profession
41.	III	25	10(23B)	Income attributable to the business of production, sale, or marketing, of khadi or products of village industries
42.	III	26	10(23DA)	Income from the activity of securitisation trust
43.	III	27	10(23EA)	Income, by way of contributions received from recognised stock exchanges and the members thereof
44.	III	28	10(23EC)	Income, by way of contributions received from Commodity exchanges and the members thereof
45.	III	29	10(23ED)	Income by way of contributions received from a depository, of Investor Protection Fund set by a depository
46.	III	30	10(23EE)	Income of Core Settlement Guarantee Fund (SGF) of the Clearing Corporations
47.	III	31	10(24)	Income of Registered Trade Unions
48.	III	32	10(25)(i)	Interest on securities, and any capital gains of the fund arising from the sale, exchange or transfer of such securities held by Provident Funds to which the Provident Funds Act, 1925 applies

49.	III	33	10(39)	Income of the nature and to the extent, arising from the international sporting event held in India
50.	III	34	10(42)	Income of a body or authority which has been established or constituted or appointed under a treaty or an agreement entered into by the Central Government with two or more countries or a convention signed by the Central Government
51.	III	35	10(43)	Any amount received as a loan, either in lump sum or in instalment, in a transaction of reverse mortgage referred to in section 70(1)(zh)
52.	III	36	10(46)	Income of certain notified bodies, authorities, boards or Trust or commissions set up by the Central or State Governments for the benefit of the general public
53.	III	37	10(48C)	Income accruing or arising to the Indian Strategic Petroleum Reserves Limited, being a wholly owned subsidiary of the Oil Industry Development Board
54.	III	38	10(15)(i), 10(15)(iic) 10(19A) 10(40)	Any gratuity computed as per the provisions of section 19(1) - (Table : S. No. 3.C) to (Table: S. No. 6.C)
55.	III	38A	Inserted by the Finance Act, 2026, with effect from tax year 2026-2027	Exempts disability pension (service + disability element) received by armed forces/paramilitary personnel invalidated out due to service-related disability, provided they have not retired on superannuation
56.	III	38B	Inserted by the Finance Act, 2026, with effect from tax year 2026-2027	Interest on compensation awarded by the Motor Accident Claims Tribunal under the Motor Vehicles Act, 1988 to an individual or his legal heir

57.	III	38C	Inserted by the Finance Act, 2026, with effect from tax year 2026-2027	Income arising from compensation or award for compulsory acquisition of any land under the provisions of the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 (except section 46) received by an individual or HUF
58.	III	38D	Inserted by the Finance Act, 2026, with effect from tax year 2026-2027	Any income chargeable under the head "Capital gains" arising from the transfer of specified capital asset
59.	III	39	10(15)(iic)	Income in the case of an individual or a Hindu undivided family by way of Interest on specified securities, bonds, and savings certificates
			10(15)(iv)(i)	
			10(19A)	Income of a former ruler by way of privy purse
			10(40)	Income of certain subsidiaries of overseas financial organizations
60.	IV	1	10(4)(ii)	Any income by way of interest on moneys standing to his credit in a Non-Resident (External) Account in any bank in India in accordance with the Foreign Exchange Management Act, 1999 and the rules made thereunder
61.	IV	2	10(6)	Any remuneration received by specified diplomats and their staff
62.	IV	3	10(6)(vi)	Remuneration received as an employee of a foreign enterprise for services rendered by him during his stay in India
63.	IV	4	10(6)(viii)	Salary of a foreign employee and non-resident for services rendered in connection with his employment on a foreign ship

64.	IV	5	10(6)(ix)	Exemption of remuneration received by employees of foreign Governments in connection with their training in India in certain cases
65.	IV	6	10(6)(C)	Income arising by way of royalty or fees for technical services rendered in or outside India by a notified foreign company
66.	IV	7	10(6)(D)	Income arising by way of royalty from, or fees for technical services rendered in or outside India from National Technical Research Organisation
67.	IV	8	10(15)(viii)	Interest received in India on a deposit made on or after 01.04.2005 in an Offshore Banking Unit by Non-resident or a person who is not ordinarily resident in India
68.	IV	9	10(15B)	Exemption to be allowed to the foreign company for the lease rental received from cruise ships operating in India
69.	IV	10	10(23BBB)	Income derived in India by way of interest, dividends or Capital gains from investments made by the European Economic Community
70.	IV	11	10(48)	Income received in India in Indian currency by a foreign company on account of sale of crude oil or any other goods or rendering of services
71.	IV	12	10(48A)	Income of a foreign company accruing or arising from the storage and sale of crude oil in India, under an agreement with the Central Government
72.	IV	13	10(48B)	Exemption of income of Foreign Company from sale of leftover stock of crude oil from strategic reserves at the expiry of agreement or arrangement

73.	IV	13A	Inserted by the Finance Act, 2026, with effect from tax year 2026-2027	Exempt specific income earned by a non-resident foreign company arising from the supply of capital goods/equipment/tooling to an Indian contract manufacturer in a Custom Bonded Area
74.	IV	13B	Inserted by the Finance Act, 2026, with effect from tax year 2026-2027	Exempts foreign-source income (overseas income) of a non-resident individual from Indian taxation who was non-resident for the preceding 5 years and visits India to render services under a Government-notified scheme, for 5 consecutive tax years
75.	IV	13C	Inserted by the Finance Act, 2026, with effect from tax year 2026-2027	Exemption to Foreign company on any income accruing or arising in India or deemed to accrue or arise in India by way of procuring Data Centre Services from a Specified Data Centre
76.	IV	14	10(6A) 10(6B) 10(6BB) 10(15A) 10(15)(iiia) 10(15)(iiib) 10(15)(iiic) 10(15)(iv)(a) 10(15)(iv)(b) 10(15)(iv)(fa)	Income falling under section 10(6A), 10(6B), 10(6BB), 10(15A), 10(15)(iiia), 10(15)(iiib), 10(15)(iiic) or 10(15)(iv)(a), 10(15)(iv)(b) or 10(15)(iv)(fa) of the Income Tax Act, 1961
77.	V	1	10(23FBA)	Income of an investment fund other than the income chargeable under the head "Profits and gains of business or profession"
78.	V	2	10(23FBB)	Income referred to in section 224, accruing or arising to, or received being that proportion of income which is of the same nature as income chargeable under the head "Profits and gains of business or profession"

79.	V	3	10(23FC)	Income by way of—(a) interest received or receivable from a special purpose vehicle; or (b) dividend received or receivable from a special purpose vehicle
80.	V	4	10(23FCA)	Income of a business trust, being a real estate investment trust by way of renting or leasing or letting out any real estate asset owned directly by such business trust
81.	V	5	10(23FD)	Any distributed income referred to in section 223 received by any unit holder of a business trust
82.	V	6	10(23FB)	Income from investment in a venture capital undertaking
83.	V	7	10(23FE)	Income of a specified person in the nature of dividend, interest or long-term capital gains arising from an investment made by it in India, whether in the form of debt or share capital or unit
84.	V	8	10(23F)	Income falling under section 10(23F) and (23FA) of the Income-tax Act, 1961, subject to the conditions as specified therein
85.	VI	1	10(4D)	Income accrued or arisen to, or received, as a result of transfer of capital asset to specified fund with respect to certain specified income
86.	VI	2	10(4D)(b)	Income accrued or arisen to, or received, as a result of transfer of securities (other than shares in a company resident in India)
87.	VI	3	10(4D)(c), 10(4D)(d)	Income from securities issued by a non-resident where such securities are not issued by a permanent establishment of a non-resident in India

88.	VI	4	10(4D)(e), 10(4)(f)	Income from a securitisation trust, which is chargeable under the head "Profits and gains of business or profession"
89.	VI	5	10(4E)	Income accrued or arisen to, or received as a result of—(a) transfer of non-deliverable forward contracts or offshore derivative instruments or over-the-counter derivatives; or (b) distribution of income on offshore derivative instruments or over-the-counter derivatives
90.	VI	6	10(4F)	Income earned by a non-resident by way of royalty or interest on account of lease of aircraft to a unit in IFSC
91.	VI	7	10(4G)	Income earned by non-residents in respect of income arising from portfolio securities or financial products or funds managed through International Financial Services Centre (IFSC) or from specified activity carried out by the specified person
92.	VI	8	10(4H)	Capital gains tax for non-residents and units of an International Financial Services Centre (IFSC) engaged in the business of leasing aircraft or ships
93.	VI	9	10(23FBC)	Income of unit-holders of a specified fund
94.	VI	10	10(23FF)	Capital gains arising or received by a non-resident or a specified fund on account of transfer of share of a company resident in India by the resultant fund or specified fund to the extent attributable to units held by specified non-residents

95.	VI	11	10(34B)	Income-tax exemption for dividends from aircraft or a ship leasing within International Financial Services Centres (IFSC)
96.	VI	12	10(15)(ix)	Exemption for interest paid to a Non-resident by a unit situated in IFSC regarding funds borrowed by it on or after 01.09.2019
97.	VII	1	10(23AA)	Income received by any person on behalf of any regimental fund or non-public fund established by the armed forces of the Union for the welfare of the past and present members of the armed forces or their dependants
98.	VII	2	10(23AAA)	Income-tax exemption to funds established for welfare of employees of which such employees are members of such fund
99.	VII	3	10(23AAB)	Income-tax exemption to pension funds set up by the Life Insurance Corporation of India on or after 01.08.1996 or any other insurer under a pension scheme
100.	VII	4	10(23BB)	Income derived by Khadi and Village Industries Boards set up under the State Acts
101.	VII	5	10(23BBA), 10(29A)(c)	Income for administration of the Charitable or Religious Institution
102.	VII	6	10(23BBC)	Income of SAARC Fund
103.	VII	7	10(23BBE)	Income of the Insurance Regulatory and Development Authority
104.	VII	8	10(23BBG)	Income of Central Electricity Regulatory Commission
105.	VII	9	10(23BBH)	Income of the Prasar Bharati (Broadcasting Corporation of India)

106.	VII	10	10(23C)(i)	The Prime Minister's National Relief Fund or the Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES FUND).
107.	VII	11	10(23C)(ii)	The Prime Minister's Fund (Promotion of Folk Art).
108.	VII	12	10(23C)(iii)	The Prime Minister's Aid to Students Fund.
109.	VII	13	10(23C)(iiia)	The National Foundation for Communal Harmony.
110.	VII	14	10(23C)(iiaa)	The Swachh Bharat Kosh, set up by the Central Government.
111.	VII	15	10(23C)(iiiiaa)	The Clean Ganga Fund set up by the Central Government.
112.	VII	16	10(23C)(iiiiaaa)	The Chief Minister's Relief Fund or the Lieutenant Governor's Relief Fund in respect of any State or Union territory as referred to in section 133(1)(a)(xv).
113.	VII	17	10(23C)(iiiab)	Income of any University or other educational institution wholly or substantially financed by the Government
114.	VII	18	10(23C)(iiiac)	Income of any hospital or other institution which is wholly or substantially financed by the Government
115.	VII	19	10(23C)(iiiad), 10(23C)(iiiie)	Income Received by any University or other educational institution & any Hospital or Hospitals or Institution or Institutions if Annual Receipts do not exceed Rs. 5 crore
116.	VII	20	10(23D)(i)	Income of Mutual Funds registered under the Securities and Exchange Board of India Act, 1992 or regulations made thereunder & set up by a public sector bank or a public financial institution or authorised by the Reserve Bank of India
117.	VII	21	10(23D)(ii)	

118.	VII	22	10(25)(ii)	Income received by trustees or board of trustees of (i) Recognized Provident fund (ii) Approved superannuation fund (iii) Approved gratuity fund (iv) Coal Mines Provident Funds and Miscellaneous Provisions Act, 1948 (v) Employees' Provident Funds and Miscellaneous Provisions Act, 1952
119.	VII	23	10(25)(iii)	
120.	VII	24	10(25)(iv)	
121.	VII	25	10(25)(v)(a)	
122.	VII	26	10(25)(v)(b)	
123.	VII	27	10(25A)	Income received by the trustees on behalf of the Employees' State Insurance Fund
124.	VII	28	10(26AAB)	Income of an Agricultural Produce Marketing Committee or Board
125.	VII	29	10(26B)	Income of statutory bodies, etc., for promoting interests of members of Scheduled Castes/Tribes or notified Backward Classes
126.	VII	30	10(26BB)	Income of a corporation set-up to protect the interests of Minorities
127.	VII	31	10(26BBB)	Income of a Corporation established for Ex-Servicemen
128.	VII	32	10(27)	Income of co-operative societies promoting the interests of the members of the Scheduled Castes or the Scheduled Tribes
129.	VII	33	10(29A)(a)	Income of Coffee Board constituted under section 4 of the Coffee Act, 1942
130.	VII	34	10(29A)(b)	Income of Rubber Board constituted under section 4(1) of the Rubber Board Act, 1947
131.	VII	35	10(29A)(c)	Income of Tea Board established under section 4 of the Tea Act, 1953
132.	VII	36	10(29A)(d)	Any income of Tobacco Board constituted under the Tobacco Board Act, 1975