

## Basic Concepts

### PERSON

An individual; A Hindu Undivided Family (HUF); A Company; A Firm; An Association of Persons (AOP) or a Body of Individuals (BOI); A local authority; Artificial juridical person.

### Basic Rates of Tax for P.Y. 2018-19:-

|                                                                                                                                                              |     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 1) In case of Individuals (both male & female) (age < 60 years) HUF, AOP, BOI & every other artificial juridical person & NON RESIDENT (irrespective of age) |     |
| Total income ≤ 2,50,000                                                                                                                                      | Nil |
| 2,50,001 – 5,00,000                                                                                                                                          | 5%  |
| 5,00,001 – 10,00,000                                                                                                                                         | 20% |
| > 10,00,001                                                                                                                                                  | 30% |
| 2) In case of Individuals (age 60 – 79 years)                                                                                                                |     |
| Total income ≤ 3,00,000                                                                                                                                      | Nil |
| 3,00,001 – 5,00,000                                                                                                                                          | 5%  |
| 5,00,001 – 10,00,000                                                                                                                                         | 20% |
| > 10,00,001                                                                                                                                                  | 30% |
| 3) In case of Individuals (age > 80 years)                                                                                                                   |     |
| Total income ≤ 5,00,000                                                                                                                                      | Nil |
| 5,00,001 – 10,00,000                                                                                                                                         | 20% |
| > 10,00,001                                                                                                                                                  | 30% |
| 4) In the case of every co-operative society -                                                                                                               |     |
| ≤ 50,000                                                                                                                                                     | 10% |
| 50,001 – 20,000                                                                                                                                              | 20% |
| > 20,001                                                                                                                                                     | 30% |

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- 5) In the case of every firm/limited liability Partnership (LLP)/ local authority/domestic company  
On the whole of the total income 30%
- 6) In the case of a domestic company:  
(i) Where the total turnover or gross receipt in the previous year 2018-17 does not exceed Rs. 250 crore - 25% of the total income  
(ii) In case of other domestic companies - 30% of the total income

**Classification - Attaining prescribed age of 60 /80 years on 31st March itself, in case of senior/city senior citizens whose date of birth falls on 1st April**  
(Circular No. 28/2016, dated 27-07-2016)

The rates of surcharge applicable for P.Y. 2018-19 are as follows:-

| Type of Person                                                 | Where Total Income exceeds Rs. 50 L/ Rs. 5 Crore                            | Rate of Surcharge |
|----------------------------------------------------------------|-----------------------------------------------------------------------------|-------------------|
| (i) Individual / HUF / AOP / BOI / Artificial juridical person | Where the total income exceeds Rs. 50 lakhs but does not exceed Rs. 1 crore | 10% of Income Tax |
|                                                                | Where the total income exceeds Rs. 1 crore                                  | 15% of Income Tax |
| (ii) Co-operative societies/local authorities/Firms/LLPs       | Where the total income exceeds Rs. 1 crore                                  | 12% of Income Tax |
| (iii) Domestic company                                         | Where total income >Rs. 1 crore but is ≤ Rs. 10 crore                       | 7% of Income-tax  |
|                                                                | Where total income >Rs. 10 crore but is ≤ Rs. 1 crore                       | 12% of Income Tax |
| (iv) Foreign company                                           | Where total income is >Rs. 1 crore but is ≤ Rs. 10 crore                    | 2% of Income-tax  |
|                                                                | Where total income is >Rs. 10 crore                                         | 5% of Income-tax  |

### Marginal relief

(i) Where the total income >Rs. 50 lakh but is ≤ Rs. 1 crore  
Eg.: Mr. A (aged 42), having total income of Rs. 51 lakhs

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### Computation of tax liability of Mr. A

|                                                                                     |            |
|-------------------------------------------------------------------------------------|------------|
| 1A) Tax payable deducting surcharge on total income of ₹ 5,00,000                   |            |
| ₹ 2,50,000 × 5% = ₹ 12,500                                                          | ₹ 12,500   |
| ₹ 5,00,000 × 20% = ₹ 1,00,000                                                       | ₹ 1,00,000 |
| ₹ 10,00,000 × 30% = ₹ 3,00,000                                                      | ₹ 3,00,000 |
| Total                                                                               | ₹ 4,12,500 |
| 1B) Add: Surcharge @ 10%                                                            | ₹ 41,250   |
| 1C) Tax payable on total income of ₹ 5 lakhs @ 12.50% plus ₹ 1,00,000 plus ₹ 92,500 | ₹ 1,32,500 |
| 1D) Add: Health & Education cess @ 4%                                               | ₹ 5,300    |
| 1E) Marginal Relief of ₹ 41,250                                                     | ₹ 41,250   |
| 1F) Total tax payable (1C) + (1D) + (1E) + (1F)                                     | ₹ 1,84,050 |

**Cess @ 4%** is applicable to all types of persons.

### Provisions relating to rounding off:

Rounding off of income [Sec. 288A]

Rounding off of tax [Sec. 288B]

Rebate of up to Rs. 2,500 for resident individuals having total income of up to Rs. 3.5 lakh [Section 87A]

### Undisclosed sources of income [Section 115BBF]

- These would attract Tax @ 78% (60% Tax + 25% Surcharge + 4% Cess)

- No basic exemption or allowance or expenditure shall be allowed to the assessee under any provision of the Income-tax Act, 1961 in computing such deemed income

- Set-off of losses not permissible against unexplained income, investments, money etc. chargeable under sections 68/69/69A/69B/69C/69D

**Certain cases when income of a previous year will be assessed in the previous year itself:**

- Shipping business of non-resident
- Persons leaving India
- AOP / BOI / Artificial Juridical Person formed for a particular event or purpose
- Persons likely to transfer property to avoid tax
- Discontinued business

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## Residential Status & Scope of Total Income

### A) RESIDENTIAL STATUS OF AN INDIVIDUAL:

#### Resident:

if he fulfils any one of the following two basic conditions [Section 6(1)]

- 1) He is in India in that year for a period or periods amounting in all to 182 days or more OR
- 2) 60 days or more during the previous year and 365 days or more during the 4 years immediately preceding that previous year.

#### Exception I [Explanation to Sec. 6(1)]

In the case of following special individuals, the 2<sup>nd</sup> basic condition is not applicable:

- 1) who leaves India for the purpose of employment outside India or
- 2) An Indian Citizen who leaves India during the previous year as a member of the crew of an Indian ship
- 3) An Indian Citizen or a person of Indian Origin, who comes on a visit to India during the previous year.

**Determining the period of stay in India for an Indian citizen, being a crew member of foreign bound ship:**

Period to be excluded

From leaving date entered in Continuous Discharge Certificate

To landing off date entered in Continuous Discharge Certificate

#### Resident and Ordinarily Resident:

In addition to fulfilling one of the above basic conditions, the individual shall have to fulfil both the following additional conditions for him to be considered as resident and ordinarily resident [Section 6(6)]

- 1) He has been resident in India in at least 2 out of 10 years preceding the relevant previous year

AND

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- 2) He has been in India for a period of 730 days or more during 7 years preceding the relevant previous year.

### RESIDENTIAL STATUS OF H.U.F. : [Section 6(2)]

**Resident:** A Hindu Undivided Family is said to be resident in India, if control and management of its affairs is wholly or partly situated in India.

#### Non-resident

A Hindu Undivided Family is non-resident in India, if control and management of its affairs is wholly situated outside India.

#### Resident and Ordinarily Resident:

A resident H.U.F. will be treated as Resident and Ordinarily Resident only if its Karta (or manager) has satisfied the two additional conditions of Sec. 6(6)

| INDIAN INCOME                                                                                                                      |     |     |     |
|------------------------------------------------------------------------------------------------------------------------------------|-----|-----|-----|
| Income received/deemed to be received in India/accrues or arises or is deemed to accrue or arise in India during the previous year | Yes | Yes | Yes |
| FOREIGN INCOME                                                                                                                     |     |     |     |
| Income which accrues or arises outside India and received outside India from PGBP controlled/set up from India                     | Yes | Yes | No  |
| Income, which accrues or arises outside India and received inside India in the previous year from any other source.                | Yes | No  | No  |
|                                                                                                                                    | No  | No  | No  |

# Ipcc Service Tax Notes For May 2013

**Siddappa N.Byrareddy**



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