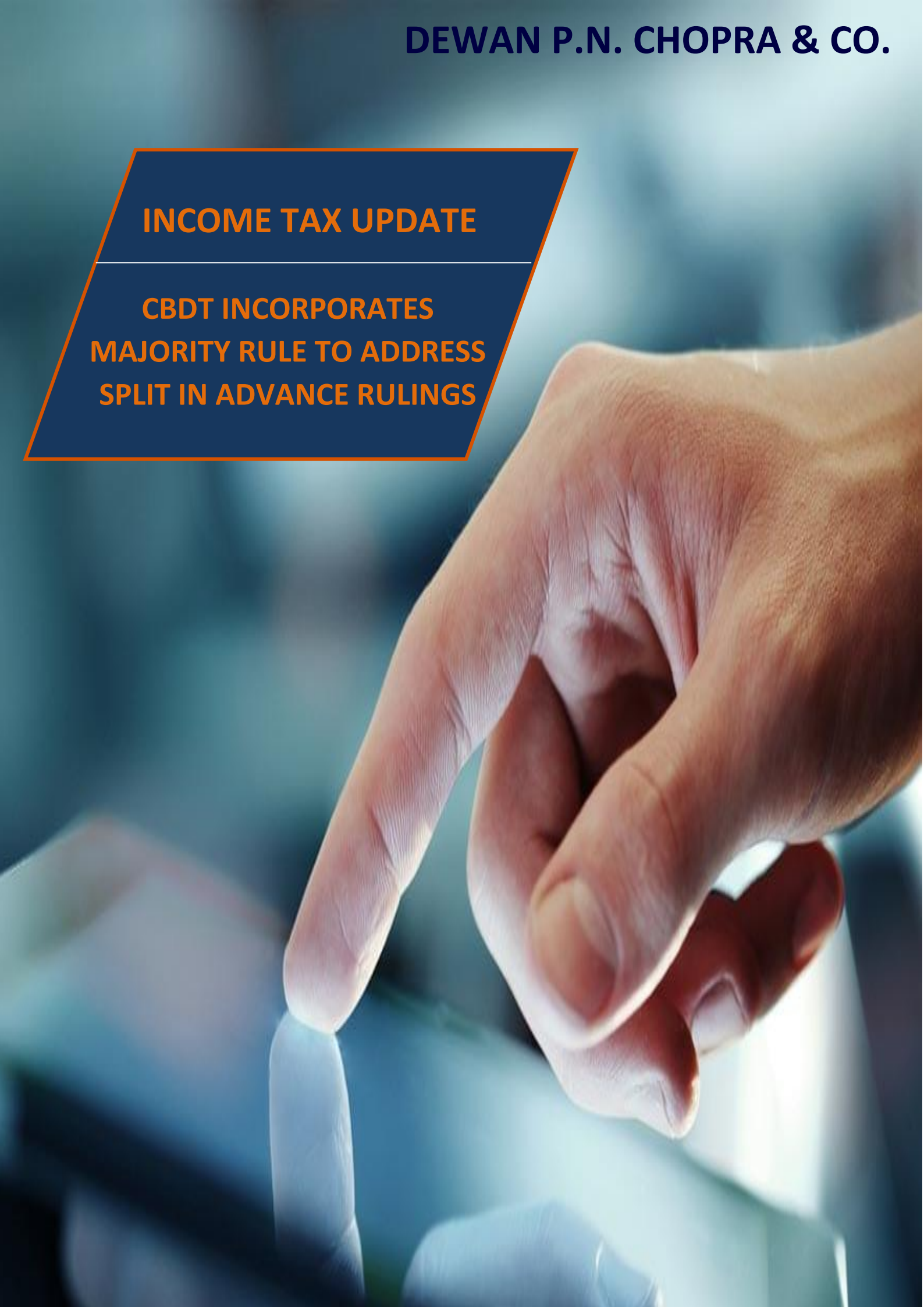


INCOME TAX UPDATE

**CBDT INCORPORATES
MAJORITY RULE TO ADDRESS
SPLIT IN ADVANCE RULINGS**



**CBDT Provides for Reference on Point of Difference
Between the Members of the Board for Advance
Rulings**

Central Board of Direct Taxes (CBDT) vide Notification No. 38/2023 dated 12th June, 2023 amends the e-Advance Rulings Scheme, 2022(Scheme), substitutes clause (iv) in Para 6(C) of the Scheme with new clause (iv) and inserts clause (v) in Para 6(C) of the Scheme. This amendment provides that in case of a difference of opinion among the Members of a Board for Advance Rulings (Board) on any point or points, the Board shall refer the matter to PCCIT (International Taxation). PCCIT will then nominate one Member from another Board, and the decision on the disputed point(s) will be made based on the majority opinion of the Members.

For details, please refer the CBDT Notification No. 38/2023 dated 12.06.2023:

<https://egazette.gov.in/WriteReadData/2023/246456.pdf>

DISCLAIMER:

The summary information herein is based on CBDT Notification No. 38/2023 dated 12.06.2023. While the information is believed to be accurate, we make no representations or warranties, express or implied, as to the accuracy or completeness of it. Readers should conduct and rely upon their own examination and analysis and are advised to seek their own professional advice. This note is not an offer, advice or solicitation. We accept no responsibility for any errors it may contain, whether caused by negligence or otherwise or for any loss, howsoever caused or sustained, by the person who relies upon it.