

 सत्यमेव जयते	OFFICE OF THE DY. COMMISSIONER OF INCOME TAX (IT)-2(2)(1) Room No. 1722, 17 <sup>th</sup> Floor, Air India Building, Nariman Point Mumbai - 400 021. PHONE NO.: (022) 2202 9405 E-MAIL: <a href="mailto:vidya.r.kishore@incometax.gov.in">vidya.r.kishore@incometax.gov.in</a>
	No. DCIT(IT)-2(2)(1)/Interasia/2019-20

To

**The Principal Officer**

**M/s. Interasia Lines Singapore Pte. Ltd.**

Agent M/s. Interasia Shipping Lines India Pvt. Ltd.

Star Hub, Building No. 2, 401 & 403

Behind Hotel ITC Grand Maratha

Sahar Road, Andheri (E), Mumbai – 400 059.

M/s. Interasia Shipping Lines India Pvt. Ltd. (i.e. applicant), an agent of **M/s. Interasia Lines Singapore Pte. Ltd.** has filed applications on 26/03/2019 requesting for issue of a certificate so as to enable it to collect freight from landing charges, terminal handling charges and other miscellaneous charges, etc. from various parties on behalf of its principal without deduction of tax at source during the Financial Year 2019-20, as M/s. Interasia Shipping Lines India Pvt. Ltd. (agent) is paying taxes fully before remitting freight to Principal after claiming DIT relief. It is also submitted that M/s. Interasia Lines Singapore Pte. Ltd., a registered company in **Singapore**, is engaged in operation of vessels in international traffic from India through its agent M/s. Interasia Shipping Lines India Pvt. Ltd. and is liable to pay tax in India u/s. 172 read with section 44B of the Act.

As per clarification given by the CBDT vide Circular Nos. 723, dt.19/09/1995, the provisions of section 195 and 194C of the Act for deduction of tax at source are not applicable to foreign shipping companies or their agents in respect of payments made on account of carriage of goods in 'international traffic'.

Accordingly, in compliance to the afore mentioned Circulars, the provisions of section 195 & 194C of the Act for **deduction of tax at source are not applicable in respect of any payments made to M/s. Interasia Lines Singapore Pte. Ltd. or to its agent M/s. Interasia Shipping Lines India Pvt. Ltd.**

This Certificate is issued after prima facie verification of details / documents / information furnished before the undersigned and it is the subject of verification / scrutiny at the time of assessment proceedings or any other legal proceedings. This Certificate is valid up to **31/03/2020** unless the same is cancelled or modified before the expiry of the said Financial Year with prior intimation.

This Certificate is provisional in nature and is subject to final assessment and is without prejudice to the stand taken by the Department during the course of the assessment proceedings.



( RAJU B KULHAR )

Asst. Commissioner of Income Tax (IT)-2(2)(1), Mumbai