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Income Tax

+ **Transfer Pricing- Tolerance Range for AY 2025-26:** For computing the arm's length price for an international transaction or specified domestic transaction, CBDT has reiterated for AY 2025-26 the earlier tolerance range, whereby a variation of up to 1% for wholesale trading transactions and up to 3% for all other cases from the actual transaction price will be accepted. Wholesale trade continues to be defined as where:

- i. Purchase cost of finished goods is at least 80% of total cost and
- ii. Average monthly closing inventory is 10% or less of sales.

This notification is issued retrospectively, but the retrospectivity would not negatively impact taxpayers.

Notification No. 157/2025 F.No.500/1/2014-APA-III / SO 5053(E) dated 06.11.2025

+ **CGAS Scheme Update:** The Scheme allows any government- authorised scheduled bank to operate Capital Gains Account Scheme ('CGAS') accounts. Taxpayers can make deposits through various electronic methods, including UPI, IMPS, NEFT, RTGS, net banking, credit/debit cards, and BHIM Aadhaar Pay. Electronic account statements are also recognised in place of physical passbooks. The effective date of deposit is the date the bank receives the payment, subject to realisation. Additionally, from 01.04.2027, CGAS accounts can be closed online by filing Forms G and H using digital signatures or electronic verification codes under secure procedures set by the Income Tax Department. The banks authorised to operate as CGAS accounts can be referred to in the notification.

Notification No. 161/2025 F. No. 370142/23/2024-TPL/ SO 5293(E) and Notification No. 162/2025 F. No. 370142/23/2024-TPL / SO 5294(E) both dated 19.11.2025

+ **Revised India – Belgium DTAA:** India has notified the Protocol amending the Double Taxation Avoidance Agreement (DTAA) with Belgium, which entered into force on 26.06.2025. This Amending Protocol updates the original DTAA that was signed in April 1993 and earlier notified in 1997. The revised Protocol introduces, inter alia, expanded exchange of information provisions, assistance in tax collection, and updated definitions including those relating to competent authorities and criminal tax matters.

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'Criminal tax matters' is interestingly defined to mean tax matters involving intentional conduct, whether before or after the entry into force of the DTAA, which is liable to prosecution under the criminal laws and/or the tax laws of the concerned country.

Notification No. 160/2025 F. 505/2/1989-FTD-I / SO 5074(E) dated 10.11.2025

Goods and Services Tax (GST)

- + Simplified GST Registration Scheme implemented on GST portal:** A *Simplified GST Registration Scheme* has been introduced on the GST portal for small taxpayers whose monthly output tax liability (based on self-assessment) towards registered taxpayers does not exceed Rs. 2.5 lakh per month (in accordance with Rule 14A of the CGST Rules, 2017). GSTN has clarified that a person already registered under this rule in any State / UT cannot obtain another registration under the same PAN within that State / UT. Key features enabled on the GST portal and conditions prescribed for withdrawal from the scheme are provided below:

Particulars	Clarification
Features enabled on GST portal	<ul style="list-style-type: none"> ▪ While applying for registration in FORM GST REG-01, applicants should select "Registration under Rule 14A". ▪ Aadhaar authentication is mandatory for the Primary Authorized Signatory and at least one Promoter/Partner. ▪ Upon Aadhaar authentication, registration will be issued within 3 working days from the date of generation of Application Reference Number (ARN).
Conditions for withdrawal from the scheme	<ul style="list-style-type: none"> ▪ All returns from effective date of registration till date of withdrawal application date must be filed. ▪ Returns must be filed for minimum period of: <ol style="list-style-type: none"> i. 3 months- if withdrawing before 01.04.2026 ii. 1 month - if withdrawing on or after 01.04.2026. ▪ There should be no pending application for amendment / cancellation for registration. ▪ There should be no active / pending proceedings relating to cancellation of registration.

GST News and Advisory dated 01.11.2025

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- + **Advisory on furnishing of bank details on the GST portal:** The GSTN has issued an advisory in relation to compliance with *Rule 10A of the CGST Rules, 2017*, which mandates taxpayers (excluding those registered under TCS, TDS, or suo-moto registrations) to furnish their bank account details within 30 days of obtaining registration or before filing outward supplies in GSTR-1 / IFF, whichever is earlier. While the required changes to enforce the above will be implemented soon, taxpayers are advised to update their bank account information on priority (if not already done). Bank account details can be added through a non-core amendment navigating to: *Services > Registration > Amendment of Registration Non-Core Fields*. [GST News and Advisory dated 20.11.2025](#)

Foreign Trade Policy (FTP)

- + **Clarification on Redemption of Advance Authorisations – Rule 96(10) of CGST Rules:** The DGFT has issued Policy Circular No. 07/2025-26 dated 11.11.2025, clarifying on redemption of Advance Authorisations ('AA's) impacted by erstwhile Rule 96(10) of CGST Rules and imports effected between 13.10.2017 to 09.01.2019. It is clarified that issuance of Export Obligation Discharge Certificates (EODCs) shall not be withheld in the following cases, where:
 - i. IGST was paid in cash at the time of clearance of consignments under AA scheme for imports made during 13.10.2017 to 09.01.2019;
 - ii. IGST/Compensation Cess exemption was not availed (only BCD exemption is has been availed);
 - iii. the pre-import condition and other procedural requirements (as applicable at the time) were complied with.

[Circular No. 07/2025-26 dated 11.11.2025](#)

- + **Amendment to Para 2.08 of the Handbook of Procedures to FTP 2023:** The DGFT has amended Para 2.08 of the Handbook of Procedures, 2023 to streamline the IEC application process. The details earlier required in Form ANF-1A (Application form for profile of Exporter and Importer) is now fully incorporated into Form ANF-2A and ANF-1A stands deleted with immediate effect. Applicants, accordingly shall henceforth use only updated application in Form ANF-2A for making an application for IEC and updating Importer and Exporter Profile.

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Further, Para 2.08(c) has been updated to provide that the details furnished in the IEC application shall now be electronically validated through integrations with records maintained by relevant Ministries, Departments, Organizations, and Banks, to the extent feasible. Applicants must continue to upload prescribed documents unless the online system specifically exempts from requirement of uploading them during an application process.

In addition to the above, Para 2.08(d) has also been amended to state that, necessary guidelines for post-verification of online IECs will be issued by DGFT Headquarters from time to time (instead of having a fixed procedure as earlier).

Public Notice No. 32/2025-26 dated 20.11.2025

FEMA

+ **Trade Relief Measures for Exporters:** RBI has given some relief to exporters impacted by global trade disruptions. Banks and NBFCs are allowed to grant moratoriums on term-loan instalments and deferment of interest on working-capital facilities for the period from September 1 to December 31, 2025. Export credit periods may be allowed up to 450 days, and packing credit may be permitted to be liquidated through alternate legitimate sources. Fortnightly reporting on the reliefs provided is mandated to be submitted on the DAKSH platform. Directions No. RBI/2025-26/96 dated 14.11.2025

+ **Extension of timeline for exports:** The period for realization and repatriation of export proceeds has been increased from 9 months to 15 months. Further, the time limit relating to write-off of unrealized export bills has been extended from 1 year to 3 years. These timelines have been provided for greater flexibility for exporters.

RBI Notification dated 13.11.2025

+ **Compounding Payment Account Revised:** The RBI has revised the bank account details for depositing compounding amounts under FEMA, requiring all applicants to use the newly notified IFSC code, account number, and bank branch for making payments. The updated details will be reflected in all compounding orders issued by the RBI.

RBI Notification dated 24.11.2025

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Companies Act

- + **Meeting of Board and its powers:** The Ministry of Corporate Affairs amended Rule 11(2) of the Companies (Meetings of Board and its Powers) Rules, 2014 (G.S.R. 811(E), 03.11.2025), clarifying that "business of financing industrial enterprises" under Section 186(11)(a) of the Companies Act, 2013 includes lending, guarantees, and security provisions by RBI-registered NBFCs and IFSCA-regulated Finance Companies in their ordinary course of business. This amendment exempts these regulated financial entities from Section 186's loan and investment restrictions, eliminating the need for special shareholder resolutions and compliance burdens previously required for lending operations.

Notification No. G.S.R. 811(E) dated 03.11.2025



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