<u>Court No. - 21</u>

Case :- INCOME TAX APPEAL No. - 47 of 2021

Appellant :- Je Energy Ventures Pvt Ltd
Respondent :- Deputy Commissioner Income Tax
Counsel for Appellant :- Suyash Agarwal

<u>Hon'ble Naheed Ara Moonis,J.</u>
<u>Hon'ble Saumitra Dayal Singh,J.</u>

Heard Shri Suyash Agarwal along with Shri Divyansh Agarwal, learned counsel for the appellant.

Admit on the following substantial question of law:-

a. Whether the ITAT was legally correct in holding that corporate guarantee by appellant on behalf of its AE, as international transaction u/s 92B of the Act without recording finding that the transaction is of such a nature as to have bearing on profits, income, losses or assets of enterprise?

b. Whether the ITAT is justified in treating corporate guarantee by appellant on behalf of its AE, as international transaction u/s 92B of the Act disregarding the fact that the provision of corporate guarantee to the AE was in the nature of shareholder service for which arm's length compensation is not required?

Connect with Income Tax Appeal No. 53 of 2019.

Paper book, if any, may be filed within one month.

List for hearing in due course.

Order Date :- 6.12.2021
Saurabh