

Niti

Developments in Tax Laws
March, 2026



*"Krishna controls the Finite and the Infinite with inconceivable supernatural transcendental force.
This is the power of inner energy."*

.....Bhagavad Gita



Section I – Direct Tax Laws

A. CBDT Clarifies Condonation of Delay in Form 10A Filing for Charitable Trusts

<https://www.incometaxindia.gov.in/documents/d/guest/circular-no-1-2026-pdf>

Section 12A of the Income Tax Act, 1961 provides the framework for registration of trusts/institutions to claim tax exemption on their income and Form 10A is the prescribed application form for obtaining such registration.

Central Board of Direct Taxes has clarified that delay in filing Form 10A can be condoned by the jurisdictional PCIT/ CIT if there is a reasonable cause. This resolves ambiguity regarding authority and ensures that genuine trusts are not denied exemption benefits merely due to procedural delays, with applicability to pending and future cases.

B. Revised Mandatory DIN Framework for Income-tax communications

<https://www.incometaxindia.gov.in/documents/d/guest/circular-4-2026-pdf>

The Central Board of Direct Taxes (CBDT) vide the said circular has overhauled the DIN (Document Identification Number) system, mandating that every notice, order, summons, or official communication issued by income-tax authorities to taxpayers must carry a system-generated DIN, thereby invalidating any communication issued without DIN (except in specified cases) and replaced the earlier 2019 framework.

The circular clarifies that DIN must be quoted on every page of the communication and in all forms of correspondence (including emails), ensuring that taxpayers can verify the authenticity of the document and safeguard against fake or unauthorized notices.

In limited exceptional situations (such as technical failure or lack of system access), manual communications without DIN are permitted only with recorded reasons, mandatory approval within 15 days, and subsequent uploading on the system with DIN, failing which such communication shall be treated as invalid, reinforcing strict compliance and accountability.

C. India–Brazil DTAA Amended Protocol Notified (Effective FY 2026-27)

<https://www.incometaxindia.gov.in/documents/d/guest/notification-no-39-2026-pdf>

CBDT has vide Notification No. 39/2026, amended the India–Brazil Double Taxation Avoidance Agreement (DTAA) to curb treaty shopping and enhance transparency. The said notification will be effective in India from FY 2026-27 (from October 18, 2025).

Key changes:

- **Principal Purpose Test (PPT):** Denies treaty benefits (such as reduced withholding tax rates, exemptions, or relief from double taxation) if arrangement lacks commercial substance



and aims primarily at tax benefit/ advantage (commonly referred to as treaty shopping), thereby ensuring that only genuine business transactions with real economic activity can avail treaty relief.

- **Strengthened Exchange of Information (EOI):** Enabling both countries to share foreseeably relevant financial and taxpayer information, including banking details, and broadens the scope of taxes covered, ensuring that the treaty remains effective even as domestic tax laws evolve.
- **Improved Mutual Agreement Procedure (MAP):** Providing a more structured mechanism for taxpayers to resolve double taxation disputes across jurisdictions, improving certainty and reducing litigation.

D. Clarification on GAAR applicability for Pre-2017 Investments

<https://www.incometaxindia.gov.in/documents/d/guest/notification-no-54-2026-pdf>

The CBDT vide Notification No. 54/2026 and the Income-tax (Tenth Amendment) Rules, 2026, has resolved General Anti-Avoidance Rules (GAAR) ambiguity, affirming grandfathering for investments made before April 1, 2017.

The amendment clarifies that while GAAR applies to arrangements where the tax benefit arises on or after April 1, 2017, irrespective of when the arrangement was entered into, it shall not apply to income arising from the transfer of investments made before April 1, 2017. Accordingly, even if such investments are transferred after 2017 and could give rise to tax benefits, GAAR cannot be invoked, ensuring certainty and reinforcing the grandfathering protection for pre-2017 investments.



Section II – Indirect Tax Laws

E. Exemption of Special Additional Excise Duty (SAED) Component on Imported Aviation Turbine Fuel (ATF)

<https://taxinformation.cbic.gov.in/view-pdf/1010606/ENG/Notifications>

The notification has been issued under Section 25(1) of the Customs Act, 1962, which allows the government to grant exemptions in public interest. Earlier, as per Section 3(1) of the Customs Tariff Act, 1975, imported goods such as Aviation Turbine Fuel (ATF) were subject to an Additional Duty of Customs (commonly known as CVD), which is meant to be equivalent to excise duty on similar domestic goods. This duty also included a component equivalent to the Special Additional Excise Duty (SAED) levied under Section 147 of the Finance Act, 2002.

Through this notification, the government has now exempted imported ATF from the portion of the Additional Duty of Customs that is equivalent to SAED. In simple terms, while ATF imports were earlier taxed with an extra excise-like component, this specific portion has now been removed. As a result, the overall tax burden on imported ATF is reduced, making it cheaper to import and providing cost relief primarily to the aviation sector.

F. Inclusion of SBER Bank (largest bank in Russia) in Eligible List under Customs Notification

<https://taxinformation.cbic.gov.in/view-pdf/1010589/ENG/Notifications>

This notification has been issued under Section 25(1) of the Customs Act, 1962 and Section 3(12) of the Customs Tariff Act, 1975, allowing the government to amend earlier exemptions in public interest. It makes a change to the earlier Notification No. 45/2025-Customs dated October 24, 2025, which contained a list of specified entities eligible for certain import-related benefits or permissions. Earlier, SBER Bank was not included in the specified list (List 14 of Table I) under the said notification, meaning imports linked to this entity were not covered under the given framework. Through this amendment, SBER Bank has now been added as a new entry (Item No. 3) in List 14.

However, this inclusion comes with conditions:

- It is effective retrospectively from June 25, 2025 till March 31, 2026, and
- Imports are allowed only for domestic consumption (i.e., not for re-export or other purposes).

In simple terms, the change expands the scope of the earlier notification by allowing transactions involving SBER Bank to qualify under the specified customs framework, subject to the given time period and usage restriction.

**Section III – Some Reminders for April, 2026**

	Particulars	Due Date
Payment of	Tax Deducted at Source for the month of March, 2026	30 th April 2026
	Provident Fund (includes EDLI) for the month of March, 2026	15 th April 2026
	ESIC for the month of March, 2026	15 th April 2026
	Annual Listing Fees to the Stock Exchange(s)	30 th April, 2026
Filing of	GSTR- 1 for March, 2026 (turnover of more than or less than Rs. 5 crores)	11 th April, 2026
	GSTR-1 for January-March 2026 (for taxpayers under the QRMP scheme)	13 th April, 2026
	GSTR-8 for March, 2026 [return to be filed by the e-commerce operators who are required to deduct TCS (Tax collected at source) under GST]	10 th April, 2026
	GSTR-7 for March, 2026 [return to be filed by the persons who is required to deduct TDS (Tax deducted at source) under GST]	10 th April, 2026
	GSTR - 3B for March, 2026 (turnover of more than Rs. 5 crores)	20 th April, 2026
	GSTR - 3B for January-March 2026 (Quarterly Filers under QRMP Scheme)	22 nd April, 2026 - Certain States
		24 th April, 2026 - Other States
GSTR-4 Composition Tax	30 th April, 2026	
SEBI / Listed Entity Compliances	Annual Disclosure under SEBI (SAST) Regulation by certain Persons and Promoters	7 working days from the end of the FY
	Statement of Investor Complaints (Q4 FY 2025-26)	30 th April, 2026
	Shareholding Pattern (Q4 FY 2025-26)	21 st April, 2026
	Corporate Governance Report (Q4 FY 2025-26)	30 th April, 2026
	Reconciliation of share capital audit report	30 th April, 2026
	Disclosure of Large Entity (SEBI Circular)	30 th April, 2026
Companies Act Compliances	MSME Form-1 (Oct 2025 – Mar 2026)	30 th April, 2026
	MBP-1 / DIR-8 / Independent Director Declaration	At First Board Meeting of FY 2026-27
	Related Party Transactions / Omnibus Approval	At First Board Meeting of FY 2026-27



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