



OFFICE OF THE JOINT COMMISSIONER OF INCOME TAX (OSD)
INTERNATIONAL TAXATION 2(1), KOLKATA
110 , SHANTIPALLY , KOLKATA – 700 107

NO. JCIT (OSD)(IT)-2(1)/KOL./DIT Relief / 2019-20/333

Date:27/01/2020

To,
The Principal Officer,
OCEAN NETWORK EXPRESS (INDIA) PRIVATE LIMITED.
3rd Floor, A-Wing, Fulcrum,
Hiranandani Business Park,
Sahar Park, Andheri (East),
Mumbai-400099.

Sub:- Grant of Annual No Objection Certificate and 100% DIT relief for your Principal **M/s Ocean Network Express Pte. Ltd.**, (PAN – AACCO6217A) up to 31/03/2021.

Ref:- Your request for issue of annual no objection certificate under CBDT circular 732 Dt. 20/12/1995 and 100% DIT Relief for the period from 01/04/2020 to 31/03/2021.

The assessee **M/s Ocean Network Express Pte. Ltd.** Singapore has filed application on 27/01/2020 for Annual No Objection Certificate and 100% D.I.T. Relief Certificate for F.Y. 2020-21 for below mentioned vessel.

Article 8(1) of the India Singapore Treaty in respect of taxability of profits from operation of ships or aircrafts in international traffic is shown below:

1. *Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State.*
2. *The provisions of paragraph 1 shall also apply to profits from participation in a pool, a joint business or an international operating agency engaged in the operation of ships of aircraft.*
3. *Interest on funds connected with the operation of ships or aircraft in international traffic shall be regarded as profits derived from the operation of such ships or aircraft, and the provision of Article 11 shall not apply in relation to such interest.*
4. *For the purpose of this Article, profits from the operation of ships or aircraft in international traffic shall mean profits derived from the transportation by sea or air of passengers, mail, livestock or goods carried on by the owners of lessees or charterers of the ship or aircraft, including profits from:*
 - a) *The sale of tickets for such transportation on behalf of other enterprises;*



- b) *The incidental lease of ships or aircraft used in such transportation;*
c) *The use, maintenance, or rental or containers (including trailers and related equipment for the transport of containers) in connection with such transportation; and*
d) *Any other activity directly connected with such transportation.*

The term, International traffic has been defined in Article 3(1)(h) as “International traffic” means any transport by a ship or aircraft operated by an enterprise of Contracting State, except when the ship or aircraft is operated solely between places in the other Contracting State; As such the Profits derived by an enterprise of a Contracting State from the operation by that enterprise of ships or aircraft in international traffic shall be taxable only in the State.

The above issue has been examined in the light of Circular No. 732 dated 20/12/1995. Point No. 4, as article 8 of India-Singapore DTAA allows the AO to issue such a certificate.

Further, the Applicant has given an undertaking that it has not undertaken any traffic other than “International traffic” and it satisfies point No. 5 of the above Circular. As such certificates may be issued in respect of the following ships:-

Sl.	Name of the Ship	Validity of Agreement
1.	ATHENS BRIDGE	14/03/2026
2	HONULULU BRIDGE	21/01/2022
3	JAKARTA BRIDGE	10/01/2021
4	MOL EMERALD	31/12/2021
5	MOL EMINENCE	31/12/2021
6	MOL GATEWAY	20/05/2021
7	MOL GENEROSITY	20/11/2021
8	MOL GLOBE	23/01/2021
9	MOL GRANDEUR	11/06/2021
10	MOL PREMIUM	27/06/2022
11	MOL SUCCESS	27/08/2025
12	NYK AQUARIUS	31/03/2022
13	NYK ARGUS	31/03/2022
14	NYK ATLAS	31/03/2022
15	NYK ATHENA	31/03/2022
16	NYK FURANO	31/03/2022
17	NYK THEMIS	16/08/2022
18	NYK THESEUS	31/03/2022

19	NYK TRITON	31/03/2022
20	SAN DIEGO BRIDGE	19/07/2025
21	SAN FRANCISCO BRIDGE	06/06/2028
22	SEATTLE BRIDGE	16/05/2028
23	AMBASSADOR BRIDGE	20/07/2021
24	MOL PRESTIGE	27/10/2029
25	SEADREAM	01/06/2020
26	VENICE BRIDGE	07/04/2020
27	NORTHERN JAMBOREE	31/05/2020
28	ALEXANDRIA BRIDGE	16/06/2027
29	GLEN CANYON BRIDGE	10/04/2021
30	GREENWICH BRIDGE	02/03/2021
31	ATHENS GLORY	31/03/2022
32	NORDMED	01/05/2020
33	FRISIA AMSTERDAM	01/07/2020
34	MOL GUARDIAN	23/01/2022
35	NYK PAULA	20/08/2024
36	MOEN ISLAND	15/07/2020

The income earned by the **M/s Ocean Network Express Pte. Ltd.**, Singapore is also entitled for 100% DIT Relief on account of income from operation of vessels operating in international traffic as per clause 4 of article 8 of India-Singapore DTAA.

It is also certified that shipping income earned by your principal on pool agreement V.S.A/C.C.A with following shipping lines will also entitled for 100% DIT Relief on account of income from operation of the vessels operating in international traffic. (As per clause 4 of Article 8)

Sl. no.	Name of the pooling partners
1	HAPAG LLOYD AKTIENGESELLSCHAFT
2	KAWASAKI KISEN KAISHA, LTD.
3	MITSUI O.S.K. LINES, LTD.
4	NIPPON YUSEN KAISHA ("NYK")
5	YANG MING MARINE TRANSPORT CORP.
6	RCL FEEDER PTE LTD (RCL)
7	SEA CONSORTIUM PTE LTD (XPRESS FEEDERS)
8	NEW GOLDEN SEA SHIPPING PTE LTD
9	COSCO CONTAINER LINES SOUTH EAST ASIA PTE LTD (COSCON)
10	WAN HAI LINES LTD
11	CMA CGM S.A. ("CMA CGM")
12	ORIENT OVERSEAS CONTAINER LINE LIMITED ("OOCL")



13	EVERGREEN MARINE CORPORATION (TAIWAN) LTD
14	FEEDERTECH PTE LTD
15	PACIFIC INTERNATIONAL LINES PTE LTD (PIL)
16	T. S. LINES CO. LTD
17	ADVANCE CONTAINER LINES (PTE) LTD
18	BENGAL TIGER LINE PTE LTD
19	FAR SHIPPING (SINGAPORE) PTE. LTD
20	GLOBAL FEEDER SHIPPING LLC
21	ORIENT EXPRESS LINES (SINGAPORE) PTE LTD
22	PENDULUM EXPRESS LINES PTE LTD
23	SAMUDERA SHIPPING LINE LTD
24	TEHAMA SHIPPING SERVICES CO. LLC
25	TRANSWORLD FEEDERS FZCO
26	MEDITERRANEAN SHIPPING COMPANY (MSC)
27	HYUNDAI MERCHANT MARINE CO, LTD
28	YANG MING (UK) LTD
29	INTERASIA LINES (IAL)



AB
 (ABHISHEK KUMAR)
 JCIT (OSD) (IT)- 2(1) , Kolkata

अभिषेक कुमार
 ABHISHEK KUMAR
 सं. आयकर आयुक्त (वि.का.अ.)(अं.क.)
 सर्कल-2(1), कोलकाता
 Jt. Commissioner of Income Tax (OSD) (IT)
 Circle-2(1), Kolkata





GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CIRCLE 2(1), IT, KOLKATA

To, The Principal Officer, M/s OCEAN NETWORK EXPRESS (INDIA) PRIVATE LIMITED 3rd Floor, A-Wing, Fulcrum Hiranandanl Business Park, Sahar Park, Andheri (East) Mumbai Mumbai 400099, Maharashtra India	
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Dated: 12/03/2020	DIN & Letter No : ITBA/COM/F/17/2019-20/1026524920(1)
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Sir/ Madam/ M/s,

Subject: Grant of 100% DIT relief for your Principal M/s Ocean Networks Express Pte. Ltd., (PAN -AACCO6217A) up to 31/03/2021

Ref:- Your request for issue of annual no objection certificate granting 100% DIT Relief upto 31.03.2021.

The assessee **M/s OCEAN NETWORKS EXPRESS PTE LTD.**, Singapore has filed application on 09/03/2020 for 100% D.I.T. Relief Certificate for F.Y. 2020-21 for 1 vessel.

Article 8(1) of the India Singapore Treaty in respect of taxability of profits from operation of ships or aircrafts in international traffic is shown below:

1. Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State.
2. The provisions of paragraph 1 shall also apply to profits from participation in a pool, a joint business or an international operating agency engaged in the operation of ships of aircraft.
3. Interest on funds connected with the operation of ships or aircraft in international traffic shall be regarded as profits derived from the operation of such ships or aircraft, and the provision of Article 11 shall not apply in relation to such interest.



Note: If digitally signed, the date of digital signature may be taken as date of document.
ANAYAKAR BHAWAN, 110 SHANTIPALLY, E.M.BYPASS, KOLKATA, West Bengal, 700107
Email: kolkata.dclt.it2.1@incometax.gov.in,

* Document Identification No.

4. For the purpose of this Article, profits from the operation of ships or aircraft in international traffic shall mean profits derived from the transportation by sea or air of passengers, mail, livestock or goods carried on by the owners of lessees or charterers of the ship or aircraft, including profits from:

1. The sale of tickets for such transportation on behalf of other enterprises;
2. The incidental lease of ships or aircraft used in such transportation;
3. The use, maintenance, or rental of containers (including trailers and related equipment for the transport of containers) in connection with such transportation; and
4. Any other activity directly connected with such transportation.

The term, International traffic has been defined in Article 3(1)(h) as "International traffic" means any transport by a ship or aircraft operated by an enterprise of Contracting State, except when the ship or aircraft is operated solely between places in the other Contracting State; As such the Profits derived by an enterprise of a Contracting State from the operation by that enterprise of ships or aircraft in international traffic shall be taxable only in the State.

The above issue has been examined in the light of Circular No. 732 dated 20/12/1995. Point No. 4, as article 8 of India-Singapore DTAA allows the AO to issue such a certificate.

Further, the Applicant has given an undertaking that it has not undertaken any traffic other than "International traffic" and it satisfies point No. 5 of the above Circular. As such certificates may be issued in respect of the following ships:-

Sl.	Name of the Ship	Validity of Agreement
1.	NYK LIBRA	30/11/2020

The income earned by the M/s Ocean Networks Express Pte Ltd., Singapore is also entitled for 100% DIT Relief on account of income from operation of vessels operating in international traffic as per clause 4 of article 8 of India-Singapore DTAA.



This Certificate has been issued on the prima facie examination of the documents filed by the applicant and on the request of the applicant. This **certificate is provisional in nature**, subject to the final assessment, and subject to the applicant furnishing all the necessary particulars at the time of assessment proceedings. **This Certificate does not confer any right on the assessee for claim of 100% Tax exemption at the time of assessment.**

ABHISHEK KUMAR
CIRCLE 2(1), IT, KOLKATA

(In case the document is digitally signed please refer Digital Signature at the bottom of the page)



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Signer: ABHISHEK KUMAR
Date: Thursday, Mar 12, 2020 5:13 PM
Location: DIRECTORATE India



OFFICE OF THE JOINT COMMISSIONER OF INCOME TAX (OSD)
INTERNATIONAL TAXATION 2(1), KOLKATA
110 , SHANTIPALLY , KOLKATA - 700 107

NO. JCIT (OSD)(IT)-2(1)/KOL./DIT Relief / 2019-20/392

Date:20/03/2020

To,
The Principal Officer,
M/s OCEAN NETWORK EXPRESS (INDIA) PRIVATE LIMITED
3rd Floor, A-Wing, Fulcrum,
Hiranandani Business Park,
Sahar Park, Andheri (East),
Mumbai-400099.

Sub:- Grant of 100% DIT relief for your Principal **M/s OCEAN NETWORKS EXPRESS PTE LTD.**, (PAN -AACCO6217A) up to 31/03/2021.

Ref:- Your request for issue of annual no objection certificate granting 100% DIT Relief upto 31.03.2021.

The assessee M/s OCEAN NETWORKS EXPRESS PTE LTD Singapore has filed application on 17/03/2020 for 100% D.I.T. Relief Certificate for F.Y. 2020-21 for 1 vessel.

Article 8(1) of the India Singapore Treaty in respect of taxability of profits from operation of ships or aircrafts in international traffic is shown below:

5. Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State.
6. The provisions of paragraph 1 shall also apply to profits from participation in a pool, a joint business or an international operating agency engaged in the operation of ships or aircraft.
7. Interest on funds connected with the operation of ships or aircraft in international traffic shall be regarded as profits derived from the operation of such ships or aircraft, and the provision of Article 11 shall not apply in relation to such interest.
8. For the purpose of this Article, profits from the operation of ships or aircraft in international traffic shall mean profits derived from the transportation by sea or air of passengers, mail, livestock or goods carried on by the owners of lessees or charterers of the ship or aircraft, including profits from:
 - e) The sale of tickets for such transportation on behalf of other enterprises;
 - f) The incidental lease of ships or aircraft used in such transportation;
 - g) The use, maintenance, or rental of containers (including trailers and related equipment for the transport of containers) in connection with such transportation; and
 - h) Any other activity directly connected with such transportation.



The term, International traffic has been defined in Article 3(1)(h) as "International traffic" means any transport by a ship or aircraft operated by an enterprise of Contracting State, except when the ship or aircraft is operated solely between places in the other Contracting State; As such the Profits derived by an enterprise of a Contracting State from the operation by that enterprise of ships or aircraft in international traffic shall be taxable only in the State.

The above issue has been examined in the light of Circular No. 732 dated 20/12/1995. Point No. 4, as article 8 of India-Singapore DTAA allows the AO to issue such a certificate.


Further, the Applicant has given an undertaking that it has not undertaken any traffic other than "International traffic" and it satisfies point No. 5 of the above Circular. As such certificates may be issued in respect of the following ships:-

Sl.	Name of the Ship	Validity of Agreement
1.	CONTI CONQUEST	15/06/2021
2.	BROOKLYN BRIDGE	31/03/2021
3.	MOL CREATION	31/03/2021
4.	ONE CONTINUITY	31/03/2021
5.	ONE COMMITMENT	31/03/2021
6.	ONE CONTRIBUTION	31/03/2021
7.	ONE COMPETENCE	31/03/2021
8.	MOL COURAGE	31/03/2021
9.	MOL MODERN	31/03/2021
10.	ALS VENUS	27/10/2020

The income earned by the M/s Ocean Networks Express Pte Ltd., Singapore is also entitled for 100% DIT Relief on account of income from operation of vessels operating in international traffic as per clause 4 of article 8 of India-Singapore DTAA.

This Certificate has been issued on the prima facie examination of the documents filed by the applicant and on the request of the applicant. This **certificate is provisional in nature**, subject to the final assessment, and subject to the applicant furnishing all the necessary particulars at the time of assessment proceedings. **This Certificate does not confer any right on the assessee for claim of 100% Tax exemption at the time of assessment.**




(ABHISHEK KUMAR)
JCIT (OSD) (IT)- 2(1) , Kolkata

अभिषेक कुमार
ABHISHEK KUMAR
सं. आयकर आयुक्त (वि.का.अ.प्र.सं.क.)
सर्कल-2(1), कोलकाता
Jt. Commissioner of Income Tax (OSD) (IT)
Circle-2(I), Kolkata



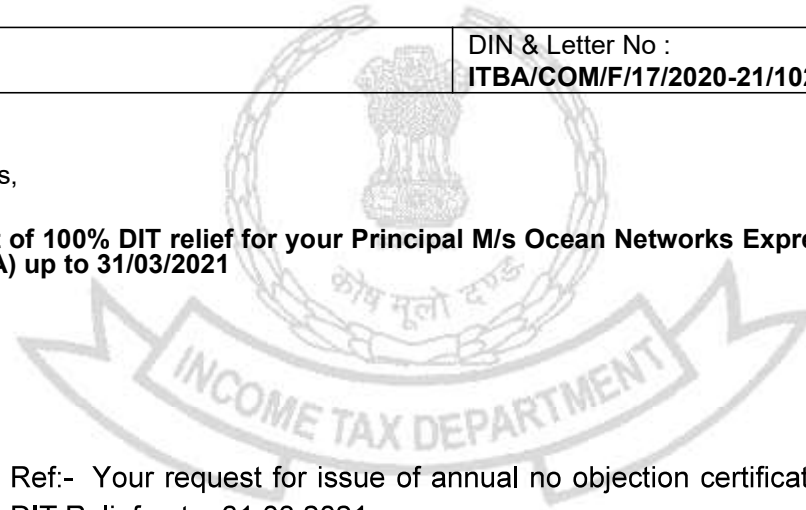
GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CIRCLE 2(1), IT, KOLKATA

To, M/s OCEAN NETWORK EXPRESS (INDIA) PRIVATE LIMITED 3rd Floor, A-Wing, Fulcrum Hiranandani Business Park, Sahar Park, Andheri (East) Mumbai Mumbai 400099, Maharashtra India	
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Dated: 30/04/2020	DIN & Letter No : ITBA/COM/F/17/2020-21/1027005588(1)
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Sir/ Madam/ M/s,

Subject: Grant of 100% DIT relief for your Principal M/s Ocean Networks Express Pte. Ltd., (PAN –AACCO6217A) up to 31/03/2021



Ref:- Your request for issue of annual no objection certificate granting 100% DIT Relief upto 31.03.2021.

The assessee **M/s OCEAN NETWORKS EXPRESS PTE LTD.**, Singapore has filed application on 28/04/2020 for 100% D.I.T. Relief Certificate for F.Y. 2020-21 for 1 vessel.

Article 8(1) of the India Singapore Treaty in respect of taxability of profits from operation of ships or aircrafts in international traffic is shown below:

- 1. Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State.*
- 2. The provisions of paragraph 1 shall also apply to profits from participation in a pool, a joint business or an international operating agency engaged in the operation of ships or aircraft.*
- 3. Interest on funds connected with the operation of ships or aircraft in international traffic shall be regarded as profits derived from the operation of such ships or aircraft, and the provision of Article 11 shall not apply in relation to such interest.*

Note: If digitally signed, the date of digital signature may be taken as date of document.
AAYAKAR BHAWAN, 110 SHANTIPALLY, E.M.BYPASS, KOLKATA, West Bengal, 700107
Email: kolkata.dcit.it2.1@incometax.gov.in,

4. For the purpose of this Article, profits from the operation of ships or aircraft in international traffic shall mean profits derived from the transportation by sea or air of passengers, mail, livestock or goods carried on by the owners of lessees or charterers of the ship or aircraft, including profits from:

1. The sale of tickets for such transportation on behalf of other enterprises;
2. The incidental lease of ships or aircraft used in such transportation;
3. The use, maintenance, or rental of containers (including trailers and related equipment for the transport of containers) in connection with such transportation; and
4. Any other activity directly connected with such transportation.

The term, International traffic has been defined in Article 3(1)(h) as "International traffic" means any transport by a ship or aircraft operated by an enterprise of Contracting State, except when the ship or aircraft is operated solely between places in the other Contracting State; As such the Profits derived by an enterprise of a Contracting State from the operation by that enterprise of ships or aircraft in international traffic shall be taxable only in the State.

The above issue has been examined in the light of Circular No. 732 dated 20/12/1995. Point No. 4, as article 8 of India-Singapore DTAA allows the AO to issue such a certificate.

Further, the Applicant has given an undertaking that it has not undertaken any traffic other than "International traffic" and it satisfies point No. 5 of the above Circular. As such certificates may be issued in respect of the following ships:-

Sl.	Name of the Ship	Validity of Agreement
1.	MOL GARLAND	18/07/2021

The income earned by the M/s Ocean Networks Express Pte Ltd., Singapore is also entitled for 100% DIT Relief on account of income from operation of vessels operating in international traffic as per clause 4 of article 8 of India-Singapore DTAA.

This Certificate has been issued on the prima facie examination of the documents filed by the applicant and on the request of the applicant. This **certificate is provisional in nature**, subject to the final assessment, and subject to the applicant furnishing all the necessary particulars at the time of assessment proceedings. **This Certificate does not confer any right on the assessee for claim of 100% Tax exemption at the time of assessment.**



ABHISHEK KUMAR
CIRCLE 2(1), IT, KOLKATA

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Signer: ABHISHEK KUMAR
Date: Thursday, April 2, 2020 3:45 PM
Location: DIRECTORATE, India



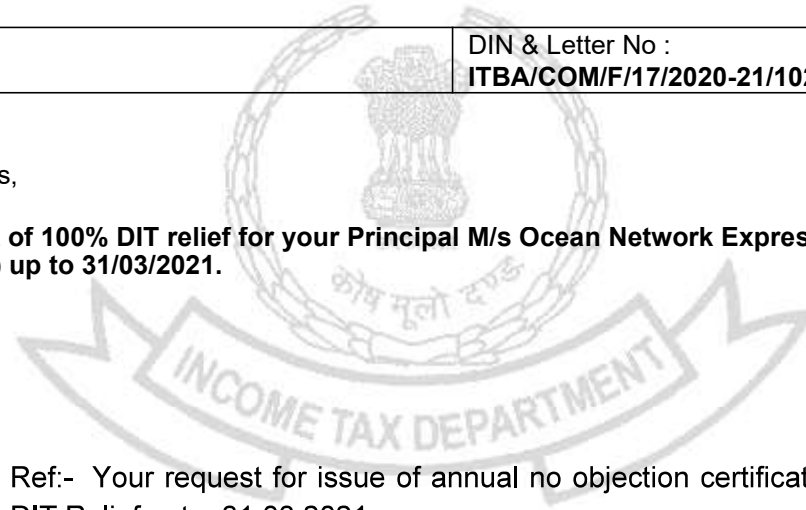
GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CIRCLE 2(1), IT, KOLKATA

To, M/s OCEAN NETWORK EXPRESS (INDIA) PRIVATE LIMITED. 3rd Floor, A-Wing, Fulcrum, Hiranandani Business Park,,Sahar Park, Andheri (East), Mumbai Mumbai 400099,Maharashtra India	
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Dated: 12/05/2020	DIN & Letter No : ITBA/COM/F/17/2020-21/1027081819(1)
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Sir/ Madam/ M/s,

Subject: Grant of 100% DIT relief for your Principal M/s Ocean Network Express Pte. Ltd., (PAN – AACCO6217A) up to 31/03/2021.



Ref:- Your request for issue of annual no objection certificate granting 100% DIT Relief upto 31.03.2021.

The assessee **M/s OCEAN NETWORK EXPRESS PTE LTD.**, Singapore has filed application on 11/05/2020 for 100% D.I.T. Relief Certificate for F.Y. 2020-21 for 1 vessel.

Article 8(1) of the India Singapore Treaty in respect of taxability of profits from operation of ships or aircrafts in international traffic is shown below:

- 1. Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State.*
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Email: kolkata.dcit.it2.1@incometax.gov.in,

4. For the purpose of this Article, profits from the operation of ships or aircraft in international traffic shall mean profits derived from the transportation by sea or air of passengers, mail, livestock or goods carried on by the owners of lessees or charterers of the ship or aircraft, including profits from:

1. The sale of tickets for such transportation on behalf of other enterprises;
2. The incidental lease of ships or aircraft used in such transportation;
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4. Any other activity directly connected with such transportation.

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The above issue has been examined in the light of Circular No. 732 dated 20/12/1995. Point No. 4, as article 8 of India-Singapore DTAA allows the AO to issue such a certificate.

Further, the Applicant has given an undertaking that it has not undertaken any traffic other than "International traffic" and it satisfies point No. 5 of the above Circular. As such certificates may be issued in respect of the following ships:-

Sl.	Name of the Ship	Validity of Agreement
1.	MOL MAESTRO	31/03/2021

The income earned by the M/s Ocean Networks Express Pte Ltd., Singapore is also entitled for 100% DIT Relief on account of income from operation of vessels operating in international traffic as per clause 4 of article 8 of India-Singapore DTAA.

This Certificate has been issued on the prima facie examination of the documents filed by the applicant and on the request of the applicant. This **certificate is provisional in nature**, subject to the final assessment, and subject to the applicant furnishing all the necessary particulars at the time of assessment proceedings. **This Certificate does not confer any right on the assessee for claim of 100% Tax exemption at the time of assessment.**



ABHISHEK KUMAR
CIRCLE 2(1), IT, KOLKATA

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Signer: ABHISHEK KUMAR
Date: Tuesday, 11/11/2020 5:12 PM
Location: DIRECTORATE, India



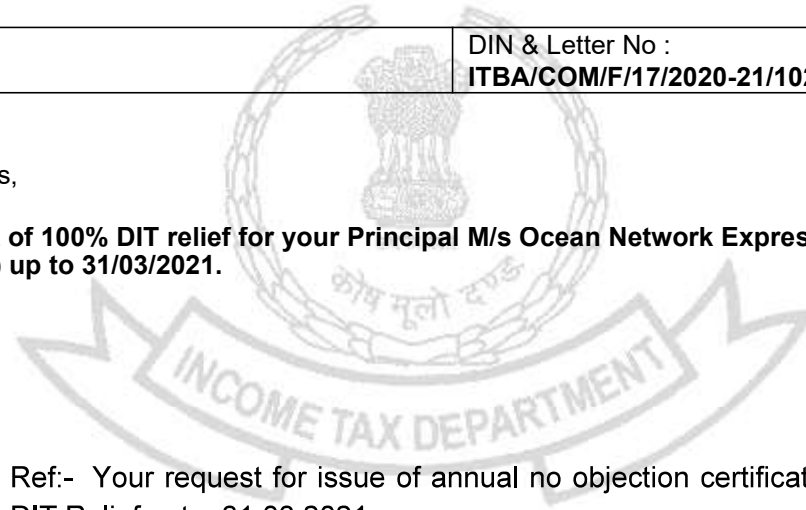
GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CIRCLE 2(1), IT, KOLKATA

To, The Principal Officer, M/s OCEAN NETWORK EXPRESS (INDIA) PRIVATE LIMITED. 3rd Floor, A-Wing, Fulcrum Hiranandani Business Park,,Sahar Park, Andheri (East), Mumbai Mumbai 400099,Maharashtra India	
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Dated: 09/06/2020	DIN & Letter No : ITBA/COM/F/17/2020-21/1027255171(1)
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Sir/ Madam/ M/s,

Subject: Grant of 100% DIT relief for your Principal M/s Ocean Network Express Pte. Ltd., (PAN – AACCO6217A) up to 31/03/2021.



Ref:- Your request for issue of annual no objection certificate granting 100% DIT Relief upto 31.03.2021.

The assessee **M/s OCEAN NETWORK EXPRESS PTE LTD.**, Singapore has filed application on 09/06/2020 for 100% D.I.T. Relief Certificate for F.Y. 2020-21 for 1 vessel.

Article 8(1) of the India Singapore Treaty in respect of taxability of profits from operation of ships or aircrafts in international traffic is shown below:

- 1. Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State.*
- 2. The provisions of paragraph 1 shall also apply to profits from participation in a pool, a joint business or an international operating agency engaged in the operation of ships or aircraft.*
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AAYAKAR BHAWAN, 110 SHANTIPALLY, E.M.BYPASS, KOLKATA, West Bengal, 700107
Email: kolkata.dcit.it2.1@incometax.gov.in,

4. For the purpose of this Article, profits from the operation of ships or aircraft in international traffic shall mean profits derived from the transportation by sea or air of passengers, mail, livestock or goods carried on by the owners of lessees or charterers of the ship or aircraft, including profits from:
1. The sale of tickets for such transportation on behalf of other enterprises;
 2. The incidental lease of ships or aircraft used in such transportation;
 3. The use, maintenance, or rental of containers (including trailers and related equipment for the transport of containers) in connection with such transportation; and
 4. Any other activity directly connected with such transportation.

The term, International traffic has been defined in Article 3(1)(h) as "International traffic" means any transport by a ship or aircraft operated by an enterprise of Contracting State, except when the ship or aircraft is operated solely between places in the other Contracting State; As such the Profits derived by an enterprise of a Contracting State from the operation by that enterprise of ships or aircraft in international traffic shall be taxable only in the State.

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Further, the Applicant has given an undertaking that it has not undertaken any traffic other than "International traffic" and it satisfies point No. 5 of the above Circular. As such certificates may be issued in respect of the following ships:-

Sl.	Name of the Ship	Validity of Agreement
1.	PHOEBE	23/04/2022

The income earned by the M/s Ocean Networks Express Pte Ltd., Singapore is also entitled for 100% DIT Relief on account of income from operation of vessels operating in international traffic as per clause 4 of article 8 of India-Singapore DTAA.

This Certificate has been issued on the prima facie examination of the documents filed by the applicant and on the request of the applicant. This **certificate is provisional in nature**, subject to the final assessment, and subject to the applicant furnishing all the necessary particulars at the time of assessment proceedings. **This Certificate does not confer any right on the assessee for claim of 100% Tax exemption at the time of assessment.**



ABHISHEK KUMAR
CIRCLE 2(1), IT, KOLKATA

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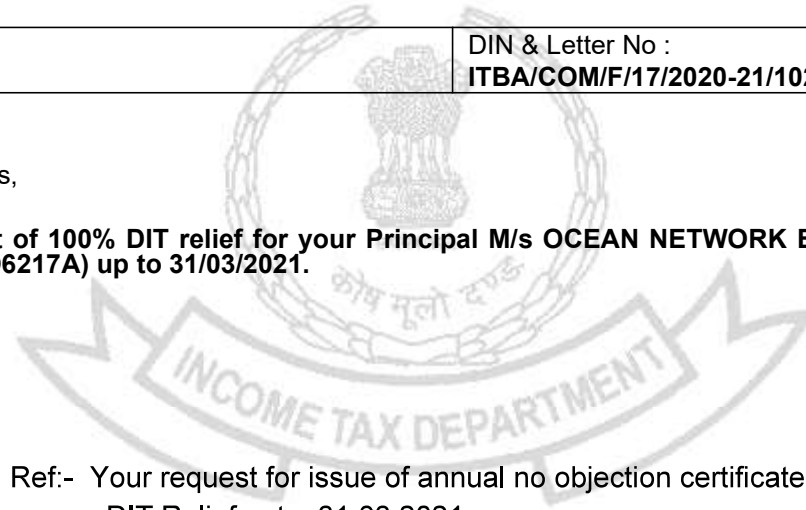
GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
CIRCLE 2(1), IT, KOLKATA

To, The Principal Officer, M/s OCEAN NETWORK EXPRESS (INDIA) PRIVATE LIMITED. 3rd Floor, A-Wing, Fulcrum, Hiranandani Business Park,,Sahar Park, Andheri (East), Mumbai Mumbai 400099,Maharashtra India	
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Dated: 20/07/2020	DIN & Letter No : ITBA/COM/F/17/2020-21/1027540813(1)
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Sir/ Madam/ M/s,

Subject: Grant of 100% DIT relief for your Principal M/s OCEAN NETWORK EXPRESS Pte Ltd., (PAN –AACCO6217A) up to 31/03/2021.



Ref:- Your request for issue of annual no objection certificate granting 100% DIT Relief upto 31.03.2021.

The assessee M/s OCEAN NETWORK EXPRESS Pte Ltd., Singapore has filed application on 20/07/2020 for 100% D.I.T. Relief Certificate for F.Y. 2020-21 for 1 vessel.

Article 8(1) of the India Singapore Treaty in respect of taxability of profits from operation of ships or aircrafts in international traffic is shown below:

- 1. Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State.*
- 2. The provisions of paragraph 1 shall also apply to profits from participation in a pool, a joint business or an international operating agency engaged in the operation of ships or aircraft.*
- 3. Interest on funds connected with the operation of ships or aircraft in international traffic shall be regarded as profits derived from the operation of such ships or aircraft, and the provision of Article 11 shall not apply in relation to such interest.*

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AAYAKAR BHAWAN, 110 SHANTIPALLY, E.M.BYPASS, KOLKATA, West Bengal, 700107
Email: kolkata.dcit.it2.1@incometax.gov.in,

4. For the purpose of this Article, profits from the operation of ships or aircraft in international traffic shall mean profits derived from the transportation by sea or air of passengers, mail, livestock or goods carried on by the owners of lessees or charterers of the ship or aircraft, including profits from:

1. The sale of tickets for such transportation on behalf of other enterprises;
2. The incidental lease of ships or aircraft used in such transportation;
3. The use, maintenance, or rental of containers (including trailers and related equipment for the transport of containers) in connection with such transportation; and
4. Any other activity directly connected with such transportation.

The term, International traffic has been defined in Article 3(1)(h) as "International traffic" means any transport by a ship or aircraft operated by an enterprise of Contracting State, except when the ship or aircraft is operated solely between places in the other Contracting State; As such the Profits derived by an enterprise of a Contracting State from the operation by that enterprise of ships or aircraft in international traffic shall be taxable only in the State.

The above issue has been examined in the light of Circular No. 732 dated 20/12/1995. Point No. 4, as article 8 of India-Singapore DTAA allows the AO to issue such a certificate.

Further, the Applicant has given an undertaking that it has not undertaken any traffic other than "International traffic" and it satisfies point No. 5 of the above Circular. As such certificates may be issued in respect of the following ships at any Indian Port:-

Sl.	Name of the Ship	Validity of Agreement
1.	George Washington Bridge	31/03/2021

The income earned by the M/s Ocean Networks Express Pte Ltd., Singapore is also entitled for 100% DIT Relief on account of income from operation of vessels operating in

international traffic as per clause 4 of article 8 of India-Singapore DTAA.

This Certificate has been issued on the prima facie examination of the documents filed by the applicant and on the request of the applicant. This **certificate is provisional in nature**, subject to the final assessment, and subject to the applicant furnishing all the necessary particulars at the time of assessment proceedings. **This Certificate does not confer any right on the assessee for claim of 100% Tax exemption at the time of assessment.**



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