



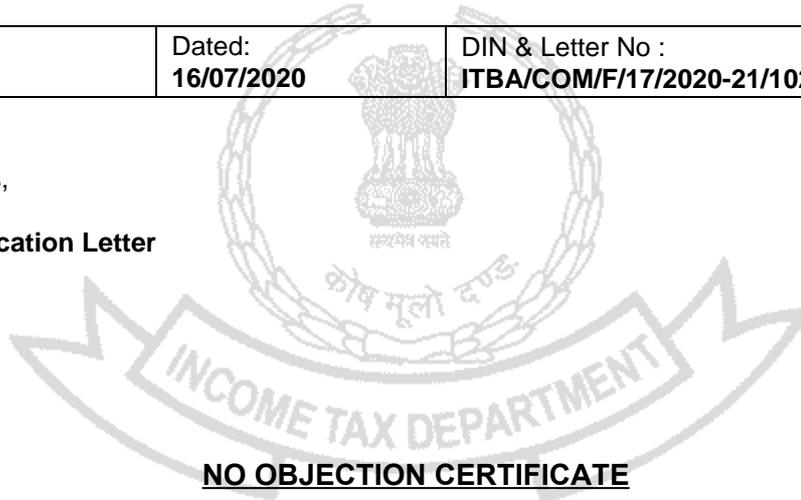
GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE DEPUTY
COMMISSIONER OF INCOME TAX
INT TAX CIRCLE 2(2)(1), MUMBAI

To, INTERASIA LINES SINGAPORE PTE LTD C/o M/s Interasia Shipping Lines India Pvt Ltd Star Hub Building No 02,401 & 403 Behind Hotel ITC Grand Maratha Andheri (East) Mumbai 400059,Maharashtra India	
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PAN: AAACI9302A	Dated: 16/07/2020	DIN & Letter No : ITBA/COM/F/17/2020-21/1027515413(1)
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Sir/ Madam/ M/s,

Subject: Clarification Letter



NO OBJECTION CERTIFICATE

M/s. Interasia Shipping Lines India Pvt. Ltd. and M/s. Aissa Maritime Pvt. Ltd. (i.e. applicant), are agent of **M/s. Interasia Lines Singapore Pte. Ltd.** has filed applications for DTAA on 30/06/2020 requesting for issue of DIT certificate for the Financial Year 2020-21. It is 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 M/s. Aissa Maritime Pvt. Ltd.** and is liable to pay tax in India u/s. 172 read with section 44B of the Act. Applicant has stated that- As per terms of Agency agreement, Agents receives income on behalf of principal. While paying such income customer deducts tax at source and pay the same in PAN of agents, in spite of submission of Certificate of DTAA. Considering the submission of the applicant, DIT Certificate was issued on 03.07.2020. thereafter, applicant has filed an application dtd. 14/07/2020 to issue No Objection Certificate through e-mail.

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**

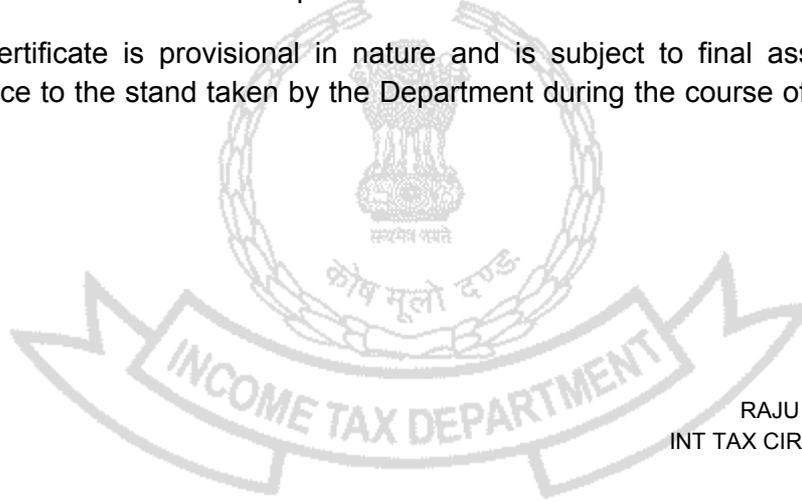
Note: If digitally signed, the date of digital signature may be taken as date of document.
ROOM NO:1722,17th Floor, AIR INDIA BUILDING, NARIMAN POINT, MUMBAI, Maharashtra, 400021
Email: MUMBAI.DCIT.IT2.2.1@INCOMETAX.GOV.IN, Office Phone:02222049405

payments made to M/s. Interasia Lines Singapore Pte. Ltd. or to its agents M/s. Interasia Shipping Lines India Pvt. Ltd. and M/s. Aissa Maritime Pvt. Ltd.

Hence, there is no objection for remittance of amount to M/s. Interasia Lines Singapore Pte. Ltd. or to its agents M/s. Interasia Shipping Lines India Pvt. Ltd. and M/s. Aissa Maritime Pvt. Ltd without deduction of tax at source by customers.

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 for the **F.Y. 01/04/2020 to 31/03/2021** 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 BABURAO KUHIKAR
INT TAX CIRCLE 2(2)(1), MUMBAI

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