

Union Budget 2025

&

Glimpse of Income Tax Bill 2025



CA. PRAMOD JAIN

FCA, FCS, FCMA, LL.B, MIMA, DISA, IP

Shared at

ICAI – Jalandhar Branch (NIRC)

3rd April 2025

FINANCE BILL 2025

■ Aims to initiate transformative reforms across six domains:

- 1. Taxation;*
- 2. Power Sector;*
- 3. Urban Development;*
- 4. Mining;*
- 5. Financial Sector; and*
- 6. Regulatory Reforms*

FINANCE BILL 2025

- Over past 10 years, implemented several reforms for convenience of tax payers:
 - *Faceless assessment,*
 - *Taxpayers charter,*
 - *Faster returns,*
 - *Almost 99 % returns being on self-assessment, and*
 - *Vivad se Vishwas scheme. – till now 33000*

FINANCE BILL 2025

- **FM's 8th Budget**
- **Divided in 5 Chapters**
 - **3 – *Direct Tax – 86 amendments***
 - **4 – *Indirect Taxes***
 - **5 – *Miscellaneous***
- **3 Schedules**

FINANCE BILL 2025

S. No.	Nature	Nos.	Sections/ Chapter/Schedule
1.	Amendment	77	2, 9, 9A, 10, 12AB, 13, 17, 23, 45, 47, 72A, 72AA, 80CCA, 80CCD, 80-IAC, 80LA, 87A, 92CA, 112A, 115AD, 115BAC, 115UA, 115V, 115VB, 115VD, 115VG, 115V-I, 115VK, 115VP, 115VT, 115VV, 115VX, 115VZA, 132, 132B, 139, 140B, 144BA, 144C, 153, 153B, 155, 158B, 158BA, 158BB, 158BFA, 193, 194, 194A, 194B, 194BB, 194D, 194G, 194H, 194-I, 194J, 194K, 194LA, 194LBC, 194Q, 194S, 206C, 246A, 253, 255, 263, 264, 270AA, 271AAB, 271C, 271CA, 271D, 271DA, 271DB, 271E, 276BB, Rule 68B of 2 nd Schedule
2.	Insertion	2	44BBD, 285BAA
3.	Substitution	1	275
4	Omission	3	206AB, 206CCA, 271BB

UNION BUDGET 2025

- New Income Tax Bill ...coming soon
- **TRUST FIRST... SCRUTINY LATER**
- New Tax Regime Rates
- Simplification of Charities & TDS
- IFSC
- Timelines rationalization & extensions

TAX RATES – S. 115BAC (1A)

Tax Rate	Total Income AY 2026-27	Total Income AY 2025-26
0%	Up to 4,00,000	Up to 3,00,000
5%	4,00,001 to 8,00,000	3,00,001 to 7,00,000
10%	8,00,001 to 12,00,000	7,00,001 to 10,00,000
15%	12,00,001 to 16,00,000	10,00,001 to 12,00,000
20%	16,00,001 to 20,00,000	12,00,001 to 15,00,000
25%	20,00,001 to 24,00,000	
30%	Above 24,00,000	Above 15,00,000

- **Rebate u/s 87A increased from Rs 25k to Rs 60k (resident Ind.)**
- **Rebate u/s 87A would not be applicable to special rate taxes**
- **Loss in Tax contribution by Rs. 1 Lac Cr.**

TAX RATES – BENEFIT

Income	Tax on Slabs and rates		Benefit of	Rebate benefit	Total Benefit	Tax after rebate Benefit
	Present	Proposed	Rate /Slab	Full upto Rs 12 lacs		
8 lac	30,000	20,000	10,000	20,000	30,000	0
9 lac	40,000	30,000	10,000	30,000	40,000	0
10 lac	50,000	40,000	10,000	40,000	50,000	0
11 lac	65,000	50,000	15,000	50,000	65,000	0
12 lac	80,000	60,000	20,000	60,000	80,000	0
16 lac	1,70,000	1,20,000	50,000	0	50,000	1,20,000
20 lac	2,90,000	2,00,000	90,000	0	90,000	2,00,000
24 lac	4,10,000	3,00,000	1,10,000	0	1,10,000	3,00,000
50 lac	11,90,000	10,80,000	1,10,000	0	1,10,000	10,80,000

INDIA GROWTH

- India fastest growing economy of world – 6 -7% growth rate
- US 2.7%; China 4.9%
- US added USD 787 billion; China 895 billion USD
- India 256 billion USD
- FY 2023-24 – 8.09 Cr. ITR
- FY 2023-24 – 4.90 Cr.– Zero Tax ITRs
- If these .. 12 L –283 billion USD

MSME

	12.10.2006		1.7.2020		2025	
	Mfg (Plant & Mach.)	Services (Equip.)	Invest.	Turnover	Invest.	Turnover
Micro	< 25L	< 10 L	< 1 Cr	< 5 Cr	< 2.5 Cr	< 10 Cr
Small	25L to 5 Cr	10L to 2 Cr	< 10 Cr	< 50 Cr	< 25 Cr	< 100 Cr
Medium	5 Cr to 10 Cr	2 Cr to 5 Cr	< 50 Cr	< 250 Cr	< 125 Cr	< 500 Cr

NUCLEAR POWER

- **2 Atomic Acts to be amended**
 - **The Atomic Act 1962**
 - **Civil Liability for Nuclear Damage Act 2010**
- **India – 2nd Asian Nation to build Nuclear power plant in 1969 at Tarapur.. after Japan**
- **Hoped to build 10000 MW by 2000.. Currently 8200 MW**
- **China 58000 MW, South Korea 32000 MW, UAE which started less than a decade ago – 5300 MW**
- **In Budget after amendments India's target 100000 MW by 2047**

TDS RATE CHANGE

Section	Nature of Payment	Existing Rate Upto 31.03.2025	Proposed Rate From 01.04.2025
194 LBC	Income in respect of investment in Securitization Trust	25% (Individual/ HUF) 30% (Other Persons)	10%
3 rd Proviso to 206C (1G)	TCS on LRS for education purpose taken by Loan from Financial Institutions as per s. 80E	0.50%	Nil

TDS/TCS THRESHOLD CHANGE

Section	Nature of Payment	Existing Threshold Upto 31.03.2025	Proposed Threshold From 01.04.2025
193	Interest on Securities	Nil	10,000
194	Dividends	5,000	10,000
194 B	Winnings from lottery or crossword puzzle	10,000 (Aggregate during FY)	10,000 (Limit per Transaction)
194 BB	Winnings from horse race	10,000 (Aggregate during FY)	10,000 (Limit per Transaction)
194 D	Insurance Commission	15,000	20,000
194 G	Commission, etc., on sale of lottery tickets	15,000	20,000
194 H	Commission or Brokerage	15,000	20,000
194 I	Rent	2,40,000 (For full year)	50,000 (Per month or part of month)
194 J	Fees for professional or technical services	30,000	50,000
194 K	Income in respect of units	5,000	10,000
194 LA	Payment of compensation on acquisition of certain immovable property	2,50,000	5,00,000
206C(1G)	Remittance under LRS & Overseas Tour Program	700000	1000000

TDS THRESHOLD CHANGE – S. 194A

S. No	Payer	For Other Persons		For Senior Citizens	
		Current threshold	Proposed threshold	Current threshold	Proposed threshold
1.	Banking Companies	40,000	50,000	50,000	1,00,000
2.	Co-operative bank	40,000	50,000	50,000	1,00,000
3.	Any Deposit with Post office	40,000	50,000	50,000	1,00,000
4.	Any Other Case	5,000	10,000	5,000	10,000
5.	Cooperative society referred to in clause (v) and clause (vii) of section 194A(3)	40,000	50,000	50,000	1,00,000

TDS / TCS

- TCS u/s 206C (1) amended to reduce the TCS rate from 2.5% to 2% on:
 - *Timber or any other forest produce (excluding tendu leaves) obtained under a forest lease*
 - *Timber obtained by any mode other than under a forest lease*
- Now Forest produce obtained under a forest lease only would be covered under TCS, as the item ‘any other forest produce not being timber or tendu leaves’ is omitted.

TDS / TCS

- Earlier the term "forest produce" was not defined.
- Now, "forest produce" shall have the same meaning as defined in:
 - *Any State Act in force, or*
 - *The Indian Forest Act, 1927*
- S. 206C (1H) is omitted. TCS no longer on sale of goods exceeding ₹50 L - only TDS u/s 194Q will apply.
- Ss. 206AB / 206CCA omitted. TDS / TCS will no longer be applied at higher rates for non-filers of ITR.

TDS / TCS

- Proviso inserted to s. 206C(7A). Currently no order can be passed against a person for non-payment of TCS after (whichever is later):
 - *6 yrs from end of FY in which tax was collectible; or*
 - *2 years from the end of the FY in which a correction statement is filed u/s 206C(3B)*
- As per the proviso to be inserted, while computing such time limits, period of stay granted by an order of any court and ending on the date on which certified copy of order vacating the stay is received by jurisdictional Pr. CIT or CIT shall be excluded.

DEDUCTIONS & EXEMPTIONS

- **S. 80CCA - Withdrawing funds from the National Savings Scheme (NSS)**
- **No interest is paid on NSS balances from October 1, 2024.**
- **Amendment would exempt withdrawals made on or after August 29, 2024, for deposits made before April 1, 1992.**
- **Both deposit & Interest !!**
- **TDS u/s 194EE !!**

DEDUCTIONS & EXEMPTIONS

- **S. 80-IAC – extend benefit of deduction for another period of 5 years for start-ups incorporated before 01.04.2030. Earlier for Start-ups incorporated before 01.04.2025.**
- **S. 10(23FE) to be amended to exempt LTCG (whether or not such capital gains are treated as STCG u/s 50AA) arising from investment by Sovereign Wealth Funds and Pension Funds made in India. Further date of investment shall be extended from 31st March 2025 to 31st March 2030.**

DEDUCTIONS & EXEMPTIONS

- Following benefits already available to NPS Contribution u/s 80CCD now extended to NPS Vatsalya Scheme.
 - *Deduction to be allowed to parents/ guardian's maximum upto Rs 50,000/-.*
 - *Where deduction has earlier been claimed and amount is subsequently withdrawn - tax thereon.*
 - *In case of the minor's death, the withdrawal amount isn't taxed as the guardian's income.*
- Where there is a partial withdrawal for education, medical treatment, or disability of Minor Child, tax exemptions on partial withdrawals shall not be included in total income of parent/guardian to extent it does not exceed 25% of amount of contributions made by him u/s 10(12BA)

CHARITIES

- Trusts registered u/s 12A(1) (ac) (i to v) and whose TI of each of 2 yrs does not exceed Rs. 5 crs. preceding to PY in which such application is made, period of validity extended from 5 to 10 yrs.
 - (i) Trust is already existing registered u/s 12A , within 3 months from 1st April, 2021;
 - (ii) Trust or institution is registered u/s 12AB and period of said registration is due to expire, at least 6 months prior to expiry of said period;
 - (iii) Trust has been provisionally reg. u/s 12AB at least 6 months prior to expiry of period of provisional reg. or within 6 months of commencement of its activities, whichever is earlier;
 - (iv) Reg. of trust has become inoperative due to first proviso to s. 11(7), at least 6 months prior to commencement of AY from which the said reg. is sought to be made operative;
 - (v) Trust or institution has adopted or undertaken modifications of objects which do not conform to conditions of reg., within 30 days from date of said adoption or modification;
 - (vi) in any other case, where activities of trust or institution have—
 - (A) not commenced, at least one month prior to the commencement of the PY relevant to the AY from which the said registration is sought;
 - (B) commenced and no income or part thereof of the said trust or institution has been excluded from the total income on account of applicability of..., or s. 11/12, for any PY ending on or before the date of such application, at any time after the commencement of such activities.

CHARITIES

- Provided that where the application is filed beyond the time allowed in sub-clauses (i) to (vi), the Pr. Commissioner or Commissioner may, if he considers that there is a reasonable cause for delay in filing the application, condone such delay and such application shall be deemed to have been filed within time
- Rs. 5 Cr.s – Corpus Donation !!
- 80G !!!
- Explanation (g) to section 12AB (4) amended to clarify that an incomplete application will not be treated as a specified violation for cancellation of registration.
- *“(g) the application referred to in clause (ac) of sub-section (1) of section 12A ~~is not complete or it~~ contains false or incorrect information”*

CHARITIES

- **S. 13** - persons who have made substantial contributions (over ₹50,000 in aggregate in lifetime of the trust), their relatives, or concerns in which they have a substantial interest. Now:
 - *Persons whose total contribution exceeds ₹1 lakh in the relevant year or ₹10 lakh cumulatively.*
 - *Relatives of these contributors will not be included in the specified persons under section 13.*
 - *Concerns in which such persons have a substantial interest will also not be included in the specified persons u/s 13.*

SALARIES – S. 17(2)

Clause	Aspect	Current Limit	Proposed Limit
(iii)	Benefits or amenity granted or provided free of cost or at concessional rate	50,000 (GTI)	Limit as may be prescribed
(viii)	Medical travel expense for employee or his family outside India	200,000	

HOUSE PROPERTIES

- Section 23(2) - annual value of 2nd self-occupied house property will be taken as nil, if the 2nd house property could not be occupied due to any reason.
- Earlier the reason for not occupying the 2nd house property was mentioned as due to employment, business or profession carried on at any other place

CAPITAL GAINS

- Tax on LTCG derived from transfer of securities other than equity share in company or unit of equity-oriented fund or unit of business trust u/s 115AD increased from 10% to 12.5%.
- S. 2(14) amended to clarify that securities held by investment funds u/s 115UB (AIFs) are capital assets, and consequently income from their transfer would be treated as capital gains from AY 2026-27
- S. 115UA shall now also include Section 112A apart from Ss. 111A and 112 for the purpose of taxation of business trusts (InvIT & REIT) at lower rates in case of income arises from CG. Other Incomes are taxable at MMR

CAPITAL GAIN

- Income on redemption of ULIP would be treated as CG and following clarifications have been made:
 - *ULIPs which are not exempt u/s 10(10D) shall be treated as a Capital Asset*
 - *Income arising from redemption of ULIPs on which the exemption of Section 10(10D) does not apply are taxable as Capital Gain u/s 45*
 - *For purpose of clause (a) of Explanation to s. 112A, the definition of equity-oriented funds shall also include ULIPs on which the exemption u/s 10(10D) is not applicable.*

ITR - U

Time Period	Rate of Additional tax	Effective Tax Rate (assuming 30% bracket)
Upto 12 months from the end of relevant AY	25%	37.5%
After expiry of 12 months and upto 24 months	50%	45%
After expiry of 24 months and upto 36 months	60%	48%
After expiry of 36 months and upto 48 months	70%	51%
Post 36 months (If notice u/s 148A issued)	ITR U cannot be filed	

- 90 L ITR-U filed in last 2 years

S. 143(1)

- **Through Bill Amendment**
- **Checking any inconsistency in the return with respect to the information in the return of any preceding previous year, as may be prescribed.**
- **Inconsistencies are yet to be prescribed.**
- **However, an example could be where taxpayer has made a claim of any credit in previous return but the corresponding figures are not the same in the current return.**

FACELESS – FURTHER DIRECTION

- Faceless schemes were introduced, with the deadline to notify them initially set and later extended to March 31, 2025.
- To remove the deadline, allowing CG to implement faceless schemes even after March 31, 2025, if needed
 - *S. 144C special dispute resolution mechanism for certain taxpayers, like foreign companies and those with international transactions, to settle tax disputes efficiently*
 - *S. 253 / 255 – ITAT*
 - *S. 92 CA - TP*

SEARCH - BOOKS

- Currently in search cases, approval for retention of seized books or documents u/s 132(8) must be sought within 30 days from the date of assessment or reassessment orders.
- In group search cases, the timing of assessments and segregation of seized documents can be challenging, leading to a complex and burdensome process for AOs.
- Time limit for obtaining approval for retention of seized documents will be extended to one month from the end of the quarter in which the assessment, reassessment, or recomputation order is passed.

BLOCK ASSESSMENTS

- **Changes in Block Assessment by Finance Act, 2024**
 - *Block assessment will apply to cases where a search U/s 132 or requisition u/s 132A is conducted on or after September 1, 2024.*
 - *Definition of undisclosed income in S. 158B is expanded to include virtual digital assets (e.g., cryptocurrency).*
 - *Any pending assessment, reassessment, recomputation, reference, or order on the date of search will be abated (cancelled). If block assessment is annulled in appeal, these abated proceedings will revive (restart). (S. 158BA)*
 - *In case of a 2nd search while the first assessment is ongoing, the earlier assessment must be completed first. The word "pending" is replaced with "required to be made" for clarity. (S. 158BA(4))*

BLOCK ASSESSMENTS

- Term "total income disclosed" is replaced with "undisclosed income" in S. 158BB to ensure only undisclosed income is taxed separately.
- Income declared in regular tax returns (before search) will be included in block period but will get due credit while calculating tax.
- Income for previous year (where return due date has not expired before search) will be taxed under normal provisions.
- International and specified domestic transactions will be excluded from block assessment, as their valuation requires a full financial year for accurate computation.
- Time limit for completing a block assessment is now 12 months from the end of quarter (instead of the month) in which the last authorization of search/requisition was executed.

CARRY FORWARD / SET-OFF LOSSES

- **Sections 72A /72AA - Carry- forward and set-off of accumulated losses and unabsorbed depreciation in cases of business amalgamation or reorganization.**
- **Currently, accumulated losses of the predecessor entity can be carried forward by the successor entity.**
- **Proposed amendment will limit the carry forward period to 8 assessment years from the year the loss was first calculated for predecessor for amalgamation or business reorganization**
- **Applicable on amalgamation or business reorganization effected on or after 1st April 2025.**
- **Unabsorbed Depreciation !!**

PENALTIES

- **Section 270AA** - Immunity from penalties under certain conditions, pay the taxes due and file a valid declaration in Form 68. Earlier, a taxpayer had to apply for immunity within 1 month of receiving an order, and AO had one month to decide. Now, deadline for AO to process the application is extended to 3 months.
- **Section 275** is being substituted to provide that penalties shall be imposed under this section within 6 months from the end of the quarter in which the legal process (appeal or review) is completed. Now post ITAT order !!!
- **Section 271AAB** for undisclosed income found during searches initiated after December 15, 2016. Omitted w.e.f. 1.9.24.
- **Section 271BB** omitted because it no longer serves any purpose. (Subscription to units u/s 88A)

PENALTIES

- **Currently, if someone fails to pay TCS on time - rigorous imprisonment u/s 276BB. Now no prosecution if TCS is paid before the due date for filing the quarterly statement**
- **Currently, penalties u/ss 271C, 271CA (Failure to deduct or collect tax at source), 271DA (S. 269 ST), 271DB (S. 269 SU – electronic mode), 271D & 271E (S. 269 SS/T) are imposed by JCIT, even though AO handles assessment. From now on, AO will be responsible for imposing penalties under these sections. However, if penalty amount exceeds a certain limit, AO will need to get approval from JCIT before imposing penalty [in accordance with Section 274(2)]**
 - *By ITO – if penalty exceed Rs. 10k*
 - *By ACIT / DCIT – if penalty exceed Rs. 20k*

INTERNATIONAL TAX

- Section 9 (i) specifies that income arising from a business connection in India is deemed to arise in India.
- Explanation 1 to Clause (i) excludes income of a non-resident from operations confined to purchasing goods in India for export.
- Explanation 2A defines "significant economic presence" as a business connection, including transactions involving goods between a non-resident and any person in India.
- Concerns were raised that this definition might override the exclusion for export-related transactions.
- Amend Explanation 2A of section 9, ensuring that transactions limited to purchasing goods for export will not be considered significant economic presence, aligning with existing exclusion for such operations.

INTERNATIONAL TAX

- **Section 44BBD to be introduced for presumptive tax for non-residents providing services or technology, to a resident company operating in electronics manufacturing facility or other connected services.**
- **25% of the total amount received by non-residents for these services shall be considered as income.**
- **Equalization Levy of 6% omitted w.e.f. 1.4.2025**

TRANSFER PRICING

- Section 92CA – ALP - assessee shall apply to the similar transaction for the 2 consecutive previous years immediately following such previous year in the form or manner as prescribed.
- The TPO shall within 1 month from the date of exercising the option shall declare the option as valid.
- If the option exercised by the assessee is declared as valid by the TPO, then:
 - *The ALP set for an international or specified domestic transaction in 1 previous year will also apply to similar transactions for the next two previous years immediately following such previous year.*
 - *TPO shall examine and determine the ALP for the above-mentioned transactions for the consecutive years in the order passed by him*

TRANSFER PRICING

- After the order is received, total taxable income shall be recomputed by TPO as per new S. 155(21).
 - *If TPO agrees with the taxpayer's method for two consecutive years, AO must recalculate total income for those years by:*
 - *Following the ALP set by the TPO u/s 92CA(4A).*
 - *Considering any directions given u/s 144C(5).*
 - *AO must complete this recalculation within 3 months from the end of the month in which the original assessment was completed.*
 - *If no assessment order or tax intimation was issued within that time, then the AO still has 3 months from when it is finally issued to complete the recomputation.*
 - *Recalculation must follow the same transfer pricing rules mentioned in S. 92C(4).*

TRANSFER PRICING

- Once the Arm's Length Price (ALP) is determined, no further reference for its computation will be made. If a reference is still made (before or after the TPO's declaration), it will be treated as if it was never made, as per Section 92CA(1).
- Option to apply the above provisions and any related proceedings will not apply to search cases.

IFSC – SUNSET DATES EXTENDED

Section	About	Existing Date	Proposed Date
80LA(2)(d)	Deductions in respect of certain incomes of Offshore Banking Units and IFSC	31.03.2025	31.03.2030
10(4D)	Income from transfer of Capital Asset located in IFSC	31.03.2025	31.03.2030
10(4F)	Royalty or Interest Income of a Non-Resident paid by IFSC	31.03.2025	31.03.2030
10(4H)	Income from transfer of shares by a non-resident or IFSC	31.03.2026	31.03.2030
47(viiad)(b)	Relocation of original fund to resultant fund	31.03.2025	31.03.2030

IFSC

- Section 10(4E) currently exempts income of non-residents from the transfer of non-deliverable forward contracts, offshore derivatives, or income from such instruments with an offshore banking unit in the IFSC. It is proposed to extend the exemption to income from such transactions entered into with Foreign Portfolio Investors (FPIs) in an IFSC unit, subject to certain conditions.
- Resultant fund definition u/s 47(viiad)(c) has been substituted to include a trust, company or LLP in IFSC referred u/s 80LA(1A) who has been granted a certificate as a retail scheme or an Exchange Traded Fund as per item (b) of sub-clause (I) of clause (c) of Explanation to s. 10(4D)

IFSC

- Non-residents receiving proceeds on such policy issued by IFSC insurance intermediary office - exempt u/s 10(10D) even if maximum premium paid in a year exceeds Rs. 5 Lacs or on ULIP exceeding Rs. 2.5 Lac a year.
- Non-residents or units of IFSC engaged in ship leasing (aircrafts were already covered) exempted from income being capital gain on transfer of equity shares u/s 10(4H).
- Non-residents or units of IFSC engaged in ship leasing (aircrafts were already covered) exempted from dividend paid u/s 10(34B).
- S. 2(22)(e) amended to exclude loans between group entities, where one is a finance company/unit in an IFSC and the parent entity is listed abroad, from being treated as dividends with effect from 1st April 2025

IFSC

- Section 9A exempts fund management by eligible fund managers from being a business connection in India, subject to conditions. Clause (c) limits Indian participation in the fund to 5% of its corpus.
- Section 9A(8A) permits the CG to relax conditions for funds managed by IFSC-based fund managers starting operations by 31st March 2024.
- Amendment made that 5% rule to be checked on 1st April and 1st October.
- If not met, 4 months to comply and Conditions (a) to (m) may be relaxed for funds managed by IFSC-based managers where the date of commencement of operations is on or before 31st March 2030.

VIRTUAL DIGITAL ASSETS

- **Statement for Crypto assets - Tax is charged at 30% on crypto assets like cryptocurrency, with no deductions allowed except for the cost of the asset. Also, 1% tax is deducted when buying or selling crypto. It is proposed to introduce u/s 285BAA to track crypto transactions by periodic filing of crypto transactions.**
- **It is proposed to update the definition of "virtual digital assets" to make sure that all crypto-assets are included, even if they weren't specifically listed before by amending definition u/s 2(47A).**
- **S. 2(47A) - Any crypto-asset being a digital representation of value that relies on a cryptographically secured distributed ledger or a similar technology to validate and secure transactions, whether or not such asset is included in other clauses**

INLAND VESSELS

- Various provisions of Chapter XII - G related to income of shipping companies (Tonnage Tax) have been expanded to include the “Inland Vessels” as well apart from the Ships.



HISTORY OF INCOME TAX IN INDIA

- References in Manusmriti & Arthashastra, where taxes were levied on traders, artisans, and farmers. - Traders and artisans paid 20% of their income, while farmers paid a percentage of their production, depending on circumstances.
- Modern income tax began in 1860, when the British government introduced the Income Tax Act to recover losses from the 1857 revolt.
- Significant reforms followed in 1918, 1922,
- In 1961, established the current framework, dividing income into 5 heads.
- Major reforms occurred in 1974, 1985, and 1997, reducing tax rates and simplifying slabs.
- In 2010, earnings up to INR 1.6 lakhs were exempted.
- By 2017, the exemption limit was raised to INR 2.5 lakhs.
- In 2020, new tax regime introduced.

COMPARISON

	1961 Act	2025 Bill
Chapters	47	23
Sections	819 (298)	536
Tables	18	57
Formulae	6	46
Word Count	5.12 lacs	2.60 lacs
Pages	823	622
Schedules	14	16

COMPARISON – WORD COUNT

	1961 Act	2025 Bill
Exemptions	30000	13500
TDS / TCS	27453	14606
NPOs	12800	7600

KEY FOCUS & RESULT

Key Focus

Simplified language

Continuity while enhancing usability

Removal of Obsolete provisions

Structurally, tables, formulae

Result

1200 provisos, 900 explanations removed

150 clauses in S. 10 now part of schedules in tables

All numeric sections removed



Tax year



**Assessment
Year**

CHAPTERS

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CHAPTERS

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CHAPTERS

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SCHEDULES

Sch.	2025 Bill	Old Schedule	1961 Act
I	Conditions for certain activities not to constitute business connection in India	Section	9A
II	Income not to be included in total income	Sections	10(1), 10(10D), 10(11), 10(11A), 10(12), 10(12A), 10(12C), 10(13), 10(13A), 10(15)(i), 10(15)(iii), 10(15)(iv)(c)10(15)(iv)(d)10(15)(iv)(e)10(15)(iv)(f), 0(15)(iv)(g)10(15)(iv)(h), 10(15)(vi), 10(15)(vii), 10(16), 10(17A), 10(33)(36), 10(50)(i)
III	Income not to be included in total income of eligible persons	Sections	10(2),10(2A),10(5),10(7),10(10BC), 10(10CC),10(12B),10(13A),10(14)(i)(ii), 10(15)(iic), 10(15)(i), 10(17), 10(17)(ii)(iii), 10(18)(i)(ii), 10(19), 10(19A), 10(20), 10(21), 10(23A), 10(23B), 10(23DA), 10(23EA), 10(23EC), 10(23ED), 10(23EE), 10(24), 10(25)(i), 10(26), 10(26AAA), 10(30)(31)(32)(37)(39)(40)(42)(43)(46), 10(48C)

SCHEDULES

Sch	2025 Bill	Old Schedule	1961 Act
IV	Income not to be included in total income of eligible non-residents, foreign companies and Other such persons	Sections	10(48), 10(48A), 10(48B), 10(4)(ii), 10(6), 10(6)(vi), 10(6)(viii), 10(6)(xi), 10(6A), 10(6C), 10(6D), 10(15)(iii)a)10(15)(iii)b)1 0(15)(iii)c)10(15)(iva)10(15)(ivb), 10(15)(iv)(fa), 10(15)(viii), 10(15A), 10(15B), 10(23BBB),
V	Income not to be included in total income of certain eligible persons including Investment funds, business trusts and their unit holders	Sections	10(23FBA),10(23FBB),10(23FC),10(23FD), 10(23FE),10(23F).10(23FB),10(23FCA)
VI	Income not to be included in total income of certain eligible persons in international Financial services centre or having income therefrom.	Sections	10(4D),10(4D)(b)(d)(e)(f), 10(4E)(4F)(4G)(4H), 10(4E), 10(23FBC), 10(23FF), 10(34B)

SCHEDULES

Sch.	2025 Bill	Old Schedule	1961 Act
VII	Persons exempt from tax	Sections	10(23AA)(23AAA)(23AAB),10(23BB),10(23BAA),10(23BB C)(23BBE)(23BBG)(23BBH) 10(23C)(i)(ii)(iii)(iiiia)(iiiiaa)(iiiiaaa)(iiiiaaaa)(iiiiaab)(iiiiaac),10(23C)(iiiad)10(23C)(iiiiae),10(23D)(i)(ii),10(25)(ii)(iii)(iv)(v),10(25)(v)(b),10(25A),10(26AAB),10(26B)(26BB)(26BBB),10(27),10(29A)(a)(b)(c)(d)(e)(f)(g)(h),10(44),10(46A),10(46B)(i)(ii)(iii),10(47),10(48D),10(48E)
VIII	Income not to be included in the total income of political parties and electoral trusts	Section	13
IX	Deduction for tea development account, coffee development account and Rubber development account for computing income under the head "PGBP"	Section	33AB Tea development account, coffee development account and rubber development account.

SCHEDULES

Sch.	2025 Bill	Old Schedule	1961 Act
X	Deduction for site restoration fund for computing income under the head “profits and gains of business or profession	Section	33ABA Site Restoration Fund.
XI	Part A: Recognised provident funds Part B: Approved superannuation funds and gratuity funds	IV	Part A: Recognised provident funds Part B: Approved superannuation funds and gratuity funds
XII	Part A: Minerals Part B: Groups of associated Minerals	VII	Part A: Minerals Part B: Groups of associated Minerals
XIII	List of articles or things	XI	List of articles or things

SCHEDULES

Sch.	2025 Bill	Old Schedule	1961 Act
XIV	Insurance Business A.—Life insurance business B.—Other insurance business C.—Other provisions	I	Insurance Business
XV	Deduction in respect of life insurance premia, contribution to provident fund, subscription to certain equity shares, etc.	Section	80C
XVI	Permitted modes of investment or deposits forms or modes of investment or deposits by a charitable or religious trust or institution	Section	11(5)

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CHARITIES

- 2.50 L ITR for **AY 2023-24**. They applied **Rs 10.01 Crs.** for charitable & religious purposes in **FY 2022-23**
- **1961 provisions**
 - *Chapter I: Charitable Purpose (S. 2(15))*
 - *Chapter III: S. 10(23C), 11, 12, 12A, 12AA, 12AB, 12AC & 13*
 - *Chapter VIA: Section 80G*
 - *Chapter XII / XIIEB: Sections 115BBC, 115BBI, 115TD, 115TE, 115TF*

CHARITIES

■ 2025 Bill – Sections 332 to 355

- *Unified term "registered non-profit organization" is used instead of various terms like trust, institution, etc.*
- *"Registration" replaces "approval"*
- *All provisions are consolidated in Part B of Chapter XVII under "Special Provisions for Registered NPOs."*

■ Capital gains u/s 11(1A) done away with.

■ Deemed application under Explanation 1(2) of section 11(1) done away with. Accumulation u/s 11(2) for up to five years continues

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SECTION 10 (OLD)

Schedule II

- Income such as agricultural income

Schedule III

- Certain eligible persons for exemption such as partners of firms and HUF etc

Schedule IV

- Exemptions to non-residents

Schedule V

- Exemption to Business trusts, Sovereign Wealth Funds etc

Schedule VI

- Exemptions to IFSC units

Schedule VII

- Persons exempt from tax

TDS

- **43 sections** in the existing Act specifying TDS liabilities, based on the payer/payee's status and applicable limits, have been **merged into one section—Section 393.**
- It contains **3 tables** for three categories of payees:
 - *Residents*
 - *Non-residents*
 - *Any person*
- Each table specifies the nature of income, monetary threshold, payer, and applicable TDS rate.
- For **Resident payees**, similar types of income (like commission, rent, interest, etc.) are grouped together.
- A separate table is provided for cases where **TDS is not required.**

TCS

- The provisions related to **Tax Collected at Source (TCS)** have also been consolidated into a single section—**Section 394**.
- This section includes one table listing the nature of receipts, monetary thresholds, collectors, and applicable TCS rates.
- Conditions for **no collection of TCS** are also outlined in the section.
- **Other Provisions:**
 - *Several provisions that were scattered across the Chapter in the existing Act are now consolidated into independent sections in the proposed Bill:*
 - **Certificates** (such as Lower Deduction/Collection Certificates)
 - **Compliance and reporting** (filing of statements, etc.)
 - **Consequences** of failure to deduct or collect tax, or failure to pay the deducted/collected tax
 - **Processing of statements**

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