Navigating the Income Tax Act 2025 for Charitable Institutions

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Present provisions in ITA 1961

- **Chapter I-Section 2(15) Definition of charitable object**
- **Chapter III: Incomes which do not form part of total income**
  - Sections 11-13 (section 10(23C approval entities *merged*))
    - Section 11-Income from property held for charitable or religious purpose
    - Section 12-Income of trusts from contributions-conditions 12A and registration 12AB
    - Section 13-Section 11 not to apply in certain cases
- **Chapter VI-A-80G-Deduction in respect of donations to certain funds, charitable institutions, etc**
- **Chapter XII-Section 105BBC Taxation of Anonymous donations 115BBI Specified income of certain institutions**
- **Chapter XIIB-Section 115TD Exit tax on accreted income of charitable institutions**

Challenges in ITA 1961 & Resolution in ITA 2025

- Provisions spread across several chapters
- Evolved over time
- Provisos and explanations make understanding difficult Resolution
- Consolidation-Chapter VIIB-Special Provisions for Registered NPOs. Total words reduced from 12.8k to 7.6k
- Use of common terms for uniform understanding
- Tabular presentation

Income Tax Act 2025 (effective 1.4.26)

Consolidation of Provisions for NPOs into a Single Chapter: Chapter VIIB-Special Provisions for Registered NPOs-(Sections 332-355). This chapter is divided into seven structured subparts:

1. Registration of NPO Section 332-333:
    - “Registered Nonprofit Organization” (Registered NPO) as a unified definition for all charitable entities i.e. society, Trust, S8, Univ etc. Definition of charitable object in section 2(23) is same except 2 provisos to seventh limb (GPU) removed from definition and taken to a separate Section 346.
    - Definition of charitable object (Section 2(23)) is same as present 2(15) except 2 provisos to seventh limb (GPU) removed and taken to Section 346
    - Properties should be held under irrevocable trust for general public.
    - Seven types of registrations-activities not commenced, activities commenced but not claimed exemption benefit, provisional registration and activity commenced, provisional registration but activity not commenced till validity period, renewal for expiry of existing registration, inoperative clauses and modification of object. Table specifies timelines for making application, approval timeline by Department and validity of registration (3/5/10 years).

2. Income of registered NPO-Section 334-343:

- Regular income has been defined in 4 parts Section 335-receipts from charitable/religious activity, receipt from property/investment, voluntary contribution (donation), incidental business income.
- Taxable regular income Section 336-85% utilisation or accumulated under Section 342.
- Specified income will be taxable @30%-section 337-anonymous donation beyond allowable limits, benefit to related person, income applied outside India, investment contravening clause 350, inter charity donation of accumulated income, accumulated income not applied within timelines, not applied for charitable or religious purpose etc. Table provided.
- Corpus as defined in Section 339 (direction from donor that it be towards corpus) is not income Section 338.
- Application of income section 341-normal provisions, 85% for inter charity, replenishment of corpus, return of loans when replenished or returned, nil for corpus donation etc.
- Accumulated income section 342-5 years, invested in modes under clause 350, repurpose allowed, no inter charity donation, in case of dissolution income transferred to similar object organisation.
- Deemed accumulated income section 343-15% income set apart from income, invested in modes specified in section 350.

3. Commercial Activities –section 344 for business undertaking same as section 11(4).
   - No registered NPO will take up commercial activity (except GPU) unless it is incidental and separate books maintained section 345.
   - Registered NPO carrying on GPU can do commercial activity as per the 2 provisos-it is to fulfil advancement of GPU, ceiling of 20% and separate books Section 346.

4. Compliance section 347-350: Books of accounts, Audit, ITR, Modes of investment.

5. Violations section 351-353: Specified violations, cancellation and accreted tax. Specified non compliance (non maintenance of books of accounts, non filing ITR, commercial receipts in excess of 20%) tax calculation as per Section 13(10) and (11) of ITA 1961.

6. Deductions for donations Section 133 (erstwhile 80G) – conditions, registrations.

7. Interpretation: Definitions and explanations of key terms used in the chapter include: anonymous donation (applicable only for religious institutions now), donation (VC), commercial activity, registered NPO, related (specified) person.

Doing away of FY and AY, only one unified year called Tax Year Section navigator between ITA 1961 and 2025 released by CBDT.

Key takeaways

- Unified definitions for common understanding
- No new tax
- Existing registered entities covered in definition of word Registration
- Accumulation provisions-no carry forward of shortfall for inter charity donation
- 15% income set apart (deemed accumulated income) to be put in specified modes of investment
- Commercial activity prohibited and specified for all objects except GPU. Other than GPU, only incidental business income permitted

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Answers to Frequently Asked Questions

Source: **specific FAQ for non-profits from the**
Official FAQs released by Central Board of Direct Taxes (CBDT)

Q1 Why have the provisions related to non-profit organisations been revamped in this Bill?

Ans: The Income-tax Act provides for exemptions to various entities including Government funded entities engaged in objects which are charitable in nature. In addition to this, specific exemption is also available to entities engaged in certain activities which satisfy social purposes. These entities receive donations, voluntary contributions and have other incomes from activities which are charitable in nature. The total number of electronically filed returns of such entities till 30th November 2024 for the assessment year 2023-24 is 2,50,682. The total amount applied by such entities for charitable and religious purposes during the FY 2022-23 is Rs 10,01,572.04 crores. Therefore, it was considered necessary to simplify and consolidate all the provisions relating to non-profit organisations for ease of understanding and compliance.

Q2 Where are the provisions related to non-profit organisations contained in the present Income-tax Act?

Ans: The present provisions related to registered non-profit organisations are contained across the following Chapters:

1. Chapter I: Charitable Purpose sec 2(15)
2. Chapter III: Sections 10(23C), section 11, section 12, section 12A, section 12AA, section 12AB, section 12AC & section 13
3. Chapter VIA: Section 80G
4. Chapter XII: Section 115BBC, Section 115BBI
5. Chapter XII EB: Section 115TD, Section 115TE, Section 115TF

Q3. What are the challenges with the present provisions of the Act related to NPOs?

Ans: The present provisions related to registered non-profit organisations are difficult to comprehend due to the following reasons:

1. Since the provisions are spread across Chapters, there are several cross references.
2. Since the provisions related to registered non-profit organisations evolved with time, several amendments have been brought to the present Act in the form of Explanations and provisos which make them difficult to read. In Section 11 itself, there are 13 Explanations and 16 provisos.

3. The interplay of different provisos and Explanations makes it quite difficult to understand.

Q4 What is the approach followed while redrafting the provisions related to registered non-profit organisations?

Ans: The following approach has been followed while redrafting the provisions related to non-profit organisations:

1. The present Act uses different terms such as trust, institution, university, educational institution, hospital etc. in different provisions. A common term registered non-profit organisation has been used in the Bill in line with the international practices.
2. Section 10(23C) uses the term “approval” while section 12AB uses the term “registration”. In order to avoid confusion, “registration” has been used in the Bill.
3. All the provisions related to registered non-profit organisations have been arranged in Part B of Chapter XVII titled “B.––Special Provisions for Registered Non-Profit Organisation” which comprises provisions corresponding to present sections 11, section 12, section 12A, section 12AA, section 12AB, section 13, section 115BBC, section 115BBI, section 115TD, section 115TE, section 115TF, and the provisions related to approval under the first and second proviso to section 80G(5) of the present Income-tax Act.
4. Redundant provisions have been removed.
5. Some of the provisions have been tabulated for lucid understanding of different scenarios such as the provisions related to:
    - Application for registration;
    - Specified income and the tax year in which it is taxable;
    - Computation of tax on accreted income

Q5 How many words have been reduced as a result of this exercise?

Ans: As a result of the exercise, there has been a substantial reduction of the words from the approximately 12,800 words to 7,600 words.

Q6. What is the structure of the new Part?

Ans: The following is the structure of new Part XVII-B

1. Registration

- Application for registration
- Switching over of regimes

2. Income

- Tax on income of a registered NPO
- Regular income
- Taxable regular income
- Specified income
- Income not to be included in total income
- Corpus donation
- Deemed corpus donation
- Application of income
- Accumulation of income
- Deemed accumulation of income

3. Commercial Activities

- Business undertaking held as property
- Commercial activities by a registered NPO
- Commercial activities by a registered NPO with GPU

4. Compliances

- Books of account
- Audit
- Return of income
- Permitted modes of investments

5. Violations

- Specified violation
- Tax on accreted income

- Other violations

6. Approval for Donations (Old 80G)

7. Interpretations

The entire Part related to non-profit organisations has been divided into 7 sub-parts which contain the provisions related to registration, income, commercial activities, compliances, violations, registrations for the purposes of eligibility of donations and interpretations.

Q7 What is the meaning of ‘registered non-profit organization’ which is not used in the present Act?

Ans: The present Income-tax Act uses different terms such as trust, institution, university, educational institution, hospital etc. in different provisions. The term registered non-profit organisation has been defined to mean any person having a valid registration under section 12A, 12AA or 12AB or section 10 (23C) of the Income-tax Act, 1961 and such registration has not been cancelled. The use of common term ‘registered non-profit organisation’ intends tp avoid confusion and for lucid understanding of the provisions of the Bill.

Q8 What is the meaning of registration under the new provisions? Is the same word registration now used for approval as well?

Ans: Section 10(23C) uses the term “approval” while section 12AB uses the term “registration”. In order to avoid confusion, “registration” has been defined in the Bill to include provisional registration, provisional approval or approval, as referred to in the second proviso to sections 10(23C) or 12AB (1) of the Income-tax Act, 1961 and under proposed section 332 of the new Income Tax Bill, 2025. However, it does not include approval under the second proviso to section 80G (5) of Income Tax Act, 1961 or section 354 of the Income Tax Bill, 2025.

Q9 Will the existing registered non-profit organisations be again required to get themselves registered under the new provisions?

Ans: There were two regimes for exemption of registered non-profit organisations. The first regime is contained in section 10(23C) and the second one was contained in section 11 to 13 of the Income Tax Act, 1961. There were certain provisions common to both the regimes that were contained in section 115BBC, 115BBI, 115TD, 115TE, 115TF and section 2(15) of the Income Tax Act, 1961. The Finance (No. 2) Act, 2024 provides that no application can be made under the first regime on or after 01st October, 2024. However, the approvals granted under the first regime shall continue to be valid for the period of their approval. They are eligible to apply for registration, subsequently, under the second regime.

As per the provisions of the Bill, all the registered non-profit organisations are eligible to claim benefits. The registered non-profit organisation has been defined to mean any person having a valid registration under section 12A, 12AA or 12AB or section 10 (23C) of the Income-tax Act, 1961 and such registration has not been cancelled.

Thus, the Bill proposes to protect the eligibility of existing registered non-profit organisations under the first as well as the second regime.

Q10 Can you provide an example as to how the new provisions will help better understand the provisions?

Ans: The provisions of the present Act contained several cross references. The Table in the proposed section 332(3) of the Income Tax Bill, 2025 provides the time limits for furnishing application, time limit for passing the order and the validity of registration in different cases in a very simple and lucid manner.

Q11 There is a dedicated proposed section 334 on the taxability of income of the registered non-profit organisations. Is there any additional tax proposed to be levied on the income of registered non-profit organisations?

Ans: No. Since most registered non-profit organisations apply 85% of their regular income for charitable or religious purposes, the taxable regular income in their cases shall be nil and there shall be no tax liability in their hands. However, if a registered non-profit organisation is not able to apply 85% of its regular income or accumulate the same, then regular income for such tax year as

reduced by its application for charitable or religious purposes or accumulation thereof shall be its taxable regular income and chargeable to tax.

Q12 What is the concept of specified income and does it propose to tax any new income of the registered non-profit organisations?

Ans: No. No new income is proposed to be taxed. Present Act provides taxability of income scattered in different provisions such as section 13, section 115BBC and section 115BBI for different violations. The Bill seeks to bring all such provisions at the same place.

Q13 The provisions related to capital gains under section 11(1A) have been done away with? Can you explain the rationale behind that?

Ans: Section 11(1A) of the present Income-tax Act provides that where a capital asset, being property held under trust wholly for charitable or religious purposes, is transferred and the whole or any part of the net consideration is utilised for acquiring another capital asset to be so held, then, the capital gain arising from the transfer shall be deemed to have been applied to charitable or religious purposes to the extent provided under the said section. Since the cost of acquisition of an asset for the objects of the registered non-profit organisation is considered as application of income, these provisions were redundant and therefore removed.

Q14 Provisions related to deemed application have also been done away with the Bill. Can you explain the reason for the same?

Ans: There are two types of accumulations allowed to the registered non-profit organisations. First, as per the provisions of section 11(2) accumulation is allowed for a period of five tax years. Second, deemed application is allowed as per the provisions of Explanation 1(2) to section 11(1) for certain specified reasons (generally accumulation for one year on account of non-receipt of the income). The dual provisions for accumulation were creating difficulties in implementation and interpretation.

The provisions related to deemed application under Explanation 1(2) to section 11(1) of the present Income-tax Act have been rationalised. This will help reducing litigation and ease the compliance. Accumulation under proposed section 342 of the Bill can be for any purpose stated in the

prescribed Form.

Section Mapping

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
1	Short title, extent and commencement.	1
2	Definitions.	2
2(15)(Proviso)	Definitions.	346
3	Previous year" defined.	3
4	Charge of income-tax.	4
5	Scope of total income.	5
5A	Apportionment of income between spouses governed by Portuguese Civil Code.	10
6	Residence in India.	6
7	Income deemed to be received.	7(1)
8	Dividend income.	7(2)
9	Income deemed to accrue or arise in India.	9
9A	Certain activities not to constitute business connection in India.	9(12)
9B	Income on receipt of capital asset or stock in trade by specified person from specified entity.	8
10	Incomes not included in total income.	11
10(1)	Agricultural income.	Schedule II(Table: S. No. 1)
10(2)	Any sum received by a member from Hindu undivided family.	Schedule III(Table: S.No 1)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(2A)	Any sum received by a partner towards his share in the total income of the firm.	Schedule III(Table: S. No. 2)
10(4)(ii)	Any income by way of interest in NRE account.	Schedule IV(Table: S. No. 1)
10(4D)	Any income accrued or arisen to, or received, as a result of transfer of capital asset referred to in section 47 (viiiab).	Schedule VI(Table: S.No. 1)
10(4D)(b)	Any income accrued or arisen to, or received, as a result of transfer of securities (other than shares in a company resident in India).	Schedule VI(Table: S. No. 2)
10(4D)(c)10(4D)(d)	Any income from securities issued by a non-resident.	Schedule VI(Table: S. No. 3)
10(4D)(e)10(4D)(f)	Any income from a securitisation trust, which is chargeable under the head "Profits and gains of business or profession".	Schedule VI(Table: S. No. 4)
10(4E)	Any income accrued or arisen to, or received as a result of— (a) transfer of non-deliverable forward contracts or offshore derivative instruments or over-the-counter derivatives; or (b) distribution of income on offshore derivative instruments.	Schedule VI(Table: S. No. 5)
10(4F)	Any income by way of royalty or interest on account of lease of an aircraft or a ship in a tax year.	Schedule VI(Table: S. No.6)
10(4G)	Any income received from–– (a) portfolio of securities or financial products or funds, managed or administered by any portfolio manager on behalf of the non-resident; or (b) such activity carried out by such person, as may be notified by the Central Government.	Schedule VI(Table: S. No. 7)
10(4H)	Any income by way of Capital gains arising from the transfer of equity shares of domestic company.	Schedule VI(Table: S. No. 8)
10(5)	The value of any travel concession or assistance.	Schedule III(Table: S. No. 8)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(6)	Any remuneration received for service in the capacity as an official mentioned in column (2).	Schedule IV(Table: S. No. 2)
10(6)(vi)	Any remuneration received as an employee for services rendered by him during his stay in India.	Schedule IV(Table: S. No. 3)
10(6)(viii)	Any income chargeable under the head “Salaries”, received or due as remuneration for services rendered in connection with his employment on a foreign ship.	Schedule IV(Table: S. No. 4)
10(6)(xi)	Any remuneration received as an employee of the Government of a foreign State	Schedule IV(Table: S. No. 5)
10(6A)	Any income falling under clauses 6A, 6B, 6BB of section 10.	Schedule IV(Table: S. No.14)
10(6C)	Any income arising by way of royalty or fees for technical services.	Schedule IV(Table: S. No. 6)
10(6D)	Any income arising by way of royalty from, or fees for technical services rendered in or outside India.	Schedule IV(Table: S. No. 7)
10(7)	Any allowances or perquisites paid or allowed as such outside India by the Government.	Schedule III(Table: S. No. 9)
10(10BC)	Any amount received or receivable from the Central Government or a State Government or a local authority by way of compensation on account of any disaster.	Schedule III(Table: S. No. 3)
10(10CC)	Income in the nature of a perquisite	Schedule III(Table: S. No. 10)
10(10D)	Any sum received under a life insurance policy, including the sum allocated by way of bonus on such policy.	Schedule II(Table: S. No. 2)
10(11)	Any amount payable from a provident fund to which the Provident Funds Act, 1925 (19 of 1925) applies, or from any other provident fund set up by the Central Government and notified by it in this behalf.	Schedule II(Table: S. No. 3)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(11A)	Any payment from any account opened in accordance with the Sukanya Samriddhi Account Rules, 2014 made under the Government Savings Promotion Act, 1873 (5 of 1873).	Schedule II(Table: S. No. 5)
10(12)	The accumulated balance due and becoming payable to an employee participating in a recognised provident fund to the extent provided in paragraph 8 of Part A of the Fourth Schedule	Schedule II(Table: S. No. 4)
10(12A)	Any payment from the National Pension System Trust.	Schedule II(Table: S. No. 6)
10(12B)	Any payment from the National Pension System Trust under the pension scheme referred to in section 80CCD.	Schedule III(Table: S. No. 4)
10(12C)	Any payment from the Agniveer Corpus Fund to a person enrolled under the Agnipath Scheme or to his nominee.	Schedule II(Table: S. No. 7)
10(13)	Any payment from an approved superannuation fund.	Schedule II(Table: S. No. 8)
10(13A)	Any special allowance from employer.	Schedule III(Table: S. No. 11)
10(14)(i)	Any special allowance or benefit.	Schedule III(Table: S. No. 12)
10(14)(ii)	Any other allowance.	Schedule III(Table: S. No. 13)
10(15)(i)	Income by way of interest, premium on redemption or other payment on such securities, bonds, annuity certificates, savings certificates, other certificates issued by the Central Government and deposits.	Schedule II(Table: S. No. 11)
10(15)(iic)	Any interest income falling under clause (15)(iic) of section 10	Schedule III(Table: S. No. 38)
10(15)(iii)	Any interest income covered under clause (15)(iii) of section 10.	Schedule II(Table: S. No. 16)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(15)(iiia)10(15)(iiib)10(15)(iiic)10(15(iva)10(15)(ivb)	Any interest income falling under clauses 15A, (15)(iiia), (15)(iiib), (15)(iiic), (15)(iv)(a) or (15)(iv)(b) of section 10 .	Schedule IV(Table: S. No. 14)
10(15)(iv)(c)10(15)(iv)(d)10(15)(iv)(e)10(15)(iv)(f)	Any interest income covered under clauses (15)(iv)(c), (15)(iv)(d), (15)(iv)€ and (15)(iv)(f) of section 10.	Schedule II(Table: S. No. 16)
10(15)(iv)(fa)	Any interest income falling under clause (15)(iv)(fa) of section 10.	Schedule IV(Table: S. No. 14)
10(15)(iv)(g)10(15)(iv)(h)	Any interest income covered under clauses (15)(iv)(g) and (15)(iv)(h) of section 10.	Schedule II(Table: S. No. 16)
10(15)(i)	Any interest income falling under clause 15(i) of section 10.	Schedule III(Table: S. No. 38)
10(15)(vi)	Interest on Gold Deposit Bonds issued under the Gold Deposit Scheme, 1999 or deposit certificates issued under the Gold Monetisation Scheme, 2015 notified by the Central Government.	Schedule II(Table: S. No. 12)
10(15)(vii)	Interest on bonds issued by a local authority or by a State Pooled Finance Entity	Schedule II(Table: S. No. 13)
10(15)(viii)	Interest received.	Schedule IV(Table: S. No. 8)
10(15)(ix)	Interest payable.	Schedule VI(Table: S. No. 12)
10(15A)	Any income falling under clauses (15A) of section 10.	Schedule IV(Table: S. No. 14)
10(15B)	Income from lease rentals, by whatever name called, of a cruise ship.	Schedule IV(Table: S. No. 9)
10(16)	Scholarships.	Schedule II(Table: S. No. 9)
10(17)	Daily allowance received.	Schedule III(Table: S. No. 5)
10(17)(ii)	Any allowance received.	Schedule III(Table: S. No. 6)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(17)(iii)	Any constituency allowance received.	Schedule III(Table: S. No. 7)
10(17A)	Any payment made, whether in cash or in kind for any award or reward.	Schedule II(Table: S. No. 10)
10(18)(i)	Pension received.	Schedule III(Table: S. No. 14)
10(18)(ii)	Family pension received.	Schedule III(Table: S. No. 15)
10(19)	Family pension received.	Schedule III(Table: S. No. 16)
10(19A)	Any income falling under clause (19A) of section 10.	Schedule III(Table: S. No. 38)
10(20)	The income which is chargeable under the head "Income from house property", "Capital gains" or "Income from other sources" or from a trade or business.	Schedule III(Table: S. No. 22)
10(21)	Any income of a research association.	Schedule III(Table: S. No. 23)
10(23A)	Any income (other than income chargeable under the head "Income from house property" or any income received for rendering any specific services or income by way of interest or dividends derived from its investments).	Schedule III(Table: S. No. 24)
10(23AA)	Any regimental Fund or Non-public Fund established by the armed forces of the Union.	Schedule VII(Table: S. No. 1)
10(23AAA)	Any fund established for such purposes as may be notified by the Board for the welfare of employees or their dependants and such employees are members of such fund.	Schedule VII(Table: S. No. 2)
10(23AAB)	Any fund, by whatever name called, set up by the Life Insurance Corporation of India on or after the 1st day of August, 1996 or any other insurer under a pension scheme.	Schedule VII(Table: S. No. 3)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(23B)	Any income attributable to the business of production, sale, or marketing, of khadi or products of village industries	Schedule III(Table: S. No. 25)
10(23BB)	An authority (whether known as the Khadi and Village Industries Board or by any other name).	Schedule VII(Table: S. No. 4)
10(23BAA)	Any body or authority (whether or not a body corporate or corporation sole) established, constituted or appointed by or under any Central Act or State Act or Provincial Act.	Schedule VII(Table: S. No. 5)
10(23BBB)	Any income derived in India by way of interest, dividends or Capital gains from investments made	Schedule IV(Table: S. No. 10)
10(23BBC)	SAARC Fund for Regional Projects set up by Colombo Declaration.	Schedule VII(Table: S. No. 6)
10(23BBE)	Insurance Regulatory and Development Authority.	Schedule VII(Table: S. No. 7)
10(23BBG)	Central Electricity Regulatory Commission.	Schedule VII(Table: S. No. 8)
10(23BBH)	Prasar Bharati (Broadcasting Corporation of India).	Schedule VII(Table: S. No. 9)
10(23C)(i)	The Prime Minister's National Relief Fund or the Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES FUND).	Schedule VII(Table: S. No. 10)
10(23C)(ii)	The Prime Minister's Fund (Promotion of Folk Art)	Schedule VII(Table: S. No.11)
10(23C)(iii)	The Prime Minister's Aid to Students Fund.	Schedule VII(Table: S. No. 12)
10(23C)(iiia)	The National Foundation for Communal Harmony.	Schedule VII(Table: S. No. 13)
10(23C)(iiiaa)	The Swachh Bharat Kosh, set up by the Central Government.	Schedule VII(Table: S. No. 14)
10(23C)(iiiaaa)	The Clean Ganga Fund set up by the Central Government.	Schedule VII(Table: S. No. 15)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(23C)(iiiaaaa)	The Chief Minister's Relief Fund or the Lieutenant Governor's Relief Fund in respect of any State or Union territory as referred to in section 80G(2)(a)(iiihf).	Schedule VII(Table: S. No. 16)
10(23C)(iiiab)	Any University or other educational institution wholly or substantially financed by the Government	Schedule VII(Table: S. No. 17)
10(23C)(iiiac)	Any hospital or other institution wholly or substantially financed by the Government.	Schedule VII(Table: S. No. 18)
10(23C)(iiiad)10(23C)(iii ae)	(a) Any University or other educational institution;(b) any hospital or other institution.	Schedule VII(Table: S. No. 19)
10(23D)(i)	A Mutual Fund registered under the Securities and Exchange Board of India Act, 1992.	Schedule VII(Table: S. No. 20)
10(23D)(ii)	Any Mutual Fund set up by a public sector bank or a public financial institution or authorised by the Reserve Bank of India.	Schedule VII(Table: S. No. 21)
10(23DA)	Any income from the activity of securitisation	Schedule III(Table: S. No. 26)
10(23EA)	Any income, by way of contributions received from recognised stock exchanges and the members thereof.	Schedule III(Table: S. No. 27)
10(23EC)	Any income, by way of contributions received from commodity exchanges and the members thereof.	Schedule III(Table: S. No. 28)
10(23ED)	Any income, by way of contributions received from a depository.	Schedule III(Table: S. No. 29)
10(23EE)	(a) Any income by way of contribution received from specified persons;(b) any income by way of penalties imposed by the recognised clearing corporation and credited to the Core Settlement Guarantee Fund; or(c) any income from investment made by the Fund.	Schedule III(Table: S. No. 30)
10(23F)	Any income falling under clauses (23F) and (23FA) of section 10	Schedule V(Table: S. No. 8)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(23FB)	any income from investment in a venture capital undertaking .	Schedule V(Table: S. No. 6)
10(23FBA)	Any income other than the income chargeable under the head “Profits and gains of business or profession”.	Schedule V(Table: S. No. 1)
10(23FBB)	Any income referred to in section 115UB, accruing or arising to, or received being that proportion of income which is of the same nature as income chargeable under the head “Profits and gains of business or profession”.	Schedule V(Table: S. No. 2)
10(23FBC)	Any income accruing or arising to, or received from a specified fund or on transfer of units in a specified fund	Schedule VI(Table: S. No. 9)
10(23FC)	Any income by way of— (a) interest received or receivable from a special purpose vehicle; or (b) dividend received or receivable from a special purpose vehicle.	Schedule V(Table: S. No. 3)
10(23FCA)	Any income by way of renting or leasing or letting out any real estate asset owned directly by such business trust.	Schedule V(Table: S. No. 4)
10(23FD)	Any distributed income referred to in section 115UA, other than––(a) that proportion of the income which is of the same nature; or(b) interest received or receivable from a special purpose vehicle by the business trust; or(c) dividend received or receivable from a special purpose vehicle by the business trust (in a case where the special purpose vehicle has exercised the option under section 115BAA); or(d)income of a business trust by way of renting or leasing or letting out any real estate asset owned directly by such business trust.	Schedule V(Table: S. No. 5)
10(23FE)	Any income of the nature of––(a) dividend;(b) interest;(c) any sum referred to in section 56(2)(xii); or (d) long-term capital gains, arising from an investment made by a specified person in India, whether in the form of debt or share capital or unit	Schedule V(Table: S. No. 7)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(23FF)	Any income of the nature of Capital gains, arising or received on account of transfer of share of a company resident in India.	Schedule VI(Table: S. No. 10)
10(24)	Any income chargeable under the heads “Income from house property” and “Income from other sources”	Schedule III(Table: S. No. 31)
10(25)(i)	Any interest on securities, and any capital gains of the fund arising from the sale, exchange or transfer of such securities.	Schedule III(Table: S. No. 32)
10(25)(ii)	A recognised provident fund.	Schedule VII(Table: S. No. 22)
10(25)(iii)	An approved superannuation fund.	Schedule VII(Table: S. No. 23)
10(25)(iv)	An approved gratuity fund.	Schedule VII(Table: S. No. 24)
10(25)(v)	Deposit-linked Insurance Fund established under section 3G of the Coal Mines Provident Funds and Miscellaneous Provisions Act.	Schedule VII(Table: S. No. 25)
10(25)(v)(b)	Deposit-linked Insurance Fund established under section 6C of Employees' Provident Funds and Miscellaneous Provisions Act	Schedule VII(Table: S. No. 26)
10(25A)	Employees' State Insurance Fund set up under the provisions of the Employees' State Insurance Act.	Schedule VII(Table: S. No. 27)
10(26)	Any income which accrues or arises— (a) from any source in the areas or States mentioned in column (3), or (b) by way of dividend or interest on securities;	Schedule III(Table: S. No. 19)
10(26AAA)	Any income which accrues or arises— (a) from any source in the State of Sikkim; or (b) by way of dividend or interest on securities.	Schedule III(Table: S. No. 20)
10(26AAB)	An agricultural produce market committee or board constituted under any law	Schedule VII(Table: S. No. 28)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(26B)	A corporation established by a Central Act or State Act or Provincial Act or of any other body, institution or association (being a body, institution or association wholly financed by the Government).	Schedule VII(Table: S. No. 29)
10(26BB)	A corporation established by the Central Government or any State Government for promoting the interests of the members of a minority community	Schedule VII(Table: S. No. 30)
10(26BBB)	Any corporation established by a Central Act or State Act or Provincial Act for the welfare and economic upliftment of ex-servicemen being the citizens of India.	Schedule VII(Table: S. No. 31)
10(27)	Any co-operative society formed for promoting the interests of the members of either the Scheduled Castes or Scheduled Tribes, or both	Schedule VII(Table: S. No. 32)
10(29A)(a)	Coffee Board constituted under section 4 of the Coffee Act, 1942.	Schedule VII(Table: 33)
10(29A)(b)	Rubber Board constituted under section 4(1) of the Rubber Board Act, 1947.	Schedule VII(Table: 34)
10(29A)(c)	Tea Board established under section 4 of the Tea Act, 1953.	Schedule VII(Table: S. No. 5)
10(29A)(d)	Tobacco Board constituted under the Tobacco Board Act, 1975.	Schedule VII(Table: S. No. 36)
10(29A)(e)	Marine Products Export Development Authority established under section 4 of the Marine Products Export Development Authority Act, 1972.	Schedule VII(Table: S. No. 37)
10(29A)(f)	Agricultural and Processed Food Products Export Development Authority established under section 4 of the Agricultural and Processed Food Products Export Development Act, 1985	Schedule VII(Table: S. No. 38)
10(29A)(g)	Spices Board constituted under section 3(1) of the Spices Board Act, 1986.	Schedule VII(Table: S. No. 39)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(29A)(h)	New Pension System Trust established on the 27th day of February, 2008 under the provisions of the Indian Trusts Act, 1882.	Schedule VII(Table: S. No. 40)
10(30)10(31)	The amount of any subsidy received from or through the concerned Board under a scheme	Schedule III(Table: S. No. 21)
10(32)	Any income includible in the total income under section 64(1A).	Schedule III(Table: S. No. 17)
10(33)	Any income arising from the transfer of a capital asset, being a unit of the Unit Scheme, 1964 referred to in Schedule I to the Unit Trust of India (Transfer of Undertaking and Repeal) Act, 2002 (58 of 2002).	Schedule II(Table: S. No. 14)
10(34B)	Any income by way of dividends from a company being a Unit of an International Financial Services Centre primarily engaged in the business of leasing of an aircraft	Schedule VI(Table: S. No. 11)
10(36)	Any income covered under clause (36)of section 10.	Schedule II(Table: S. No. 16)
10(37)	Any income chargeable under the head "Capital gains" arising from the transfer of agricultural land.	Schedule III(Table: S. No. 18)
10(39)	Any income of the nature and to the extent, arising from the international sporting event held in India.	Schedule III(Table: S. No. 33)
10(40)	Any income falling under clause (40) of section 10 .	Schedule III(Table: S. No. 38)
10(42)	Any income, of the nature and to the extent, which the Central Government may notify in this behalf.	Schedule III(Table: S. No. 34)
10(43)	Any amount received as a loan, either in lump sum or in instalment, in a transaction of reverse mortgage referred to in section 47(xvi).	Schedule III(Table: S. No. 35)
10(44)	New Pension System Trust established on the 27th day of February, 2008 under the provisions of the Indian Trusts Act, 1882	Schedule VII(Table: S. No. 41)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(46)	Any income of the nature and to the extent which the Central Government may, by notification, specify in this behalf.	Schedule III(Table: S. No. 36)
10(46A)	Any body or authority or Board or Trust or Commission, not being a company, which has been established or constituted by or under a Central Act or State Act with one or more of the following purposes, namely:- (a) dealing with and satisfying the need for housing accommodation; (b) planning, development or improvement of cities, towns and villages; (c) regulating, or regulating and developing, any activity for the benefit of the general public; or (d) regulating any matter, for the benefit of the general public, arising out of the object for which it has been created.	Schedule VII(Table: S. No. 42)
10(46B)(i)	National Credit Guarantee Trustee Company Limited, being a company established and wholly financed by the Central Government for the purposes of operating credit guarantee funds established and wholly financed by the Central Government	Schedule VII(Table: S. No. 43)
10(46B)(ii)	A credit guarantee fund established and wholly financed by the Central Government and managed by the National Credit Guarantee Trustee Company Limited.	Schedule VII(Table: S. No. 44)
10(46B)(iii)	Credit Guarantee Fund Trust for Micro and Small Enterprises, being a trust created by the Central Government and the Small Industries Development Bank of India established under sub section (1) of section 3 of the Small Industries Development Bank of India Act, 1989 (39 of 1989)	Schedule VII(Table: S. No. 45)
10(47)	An infrastructure debt fund.	Schedule VII(Table: S. No. 46)
10(48)	Any income received in India in Indian currency.	Schedule IV(Table: S. No. 11)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10(48A)	Any income accruing or arising on account of storage of crude oil in a facility in India and sale of such crude oil to any person resident in India.	Schedule IV(Table: S. No.12)
10(48B)	Any income accruing or arising to on account of sale of leftover stock of crude oil, if any, from the facility in India after the expiry of the agreement or arrangement referred to against serial number 12 or on termination of the said agreement or arrangement	Schedule IV(Table: S. No. 13)
10(48C)	Any income accruing or arising as a result of arrangement for replenishment of crude oil stored in its storage facility in pursuance of the directions of the Central Government in this behalf.	Schedule III(Table: S. No. 37)
10(48D)	An institution established for financing the infrastructure and development set up under an Actof Parliament	Schedule VII(Table: S. No. 47)
10(48E)	A developmental financing institution, licensed by the Reserve Bank of India under an Act ofParliament referred to against serial number 47.	Schedule VII(Table: S. No. 48)
10(50)(i)	Any income arising from any specified service provided on or after the date on which the provisions of Chapter VIII of the Finance Act, 2016 comes into force and chargeable to equalisation levy under that Chapter.	Schedule II(Table: S. No. 15)
10A	Special provision in respect of newly established undertakings in free trade zone, etc.	Redundant
10AA	Special provisions in respect of newly established Units in Special Economic Zones.	144
10B	Special provisions in respect of newly established hundred per cent export-oriented undertakings.	Redundant
10BA	Special provisions in respect of export of certain articles or things.	Redundant

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
10BB	Meaning of computer programmes in certain cases.	Redundant
10C	Special provision in respect of certain industrial undertakings in North-Eastern Region.	Redundant
11(1)(a)	Income from property held for charitable or religious purposes.	336
11(1)(b)	Income from property held for charitable or religious purposes.	336
11(1)(c)	Income from property held for charitable or religious purposes.	338(a)
11(1)(d)	Income from property held for charitable or religious purposes.	338(b)
11(1)(d)	Income from property held for charitable or religious purposes.	339
11(1)(Explanation)(1)(1)	Income from property held for charitable or religious purposes.	335(c)
11(1)(Explanation)(1)(2)	Income from property held for charitable or religious purposes.	Omitted
11(1)(Explanation)(2)	Income from property held for charitable or religious purposes.	341(1)(c)
11(1)(Explanation)(3)	Income from property held for charitable or religious purposes.	341(1)(a)(iii)
11(1)(Explanation)(3A)	Income from property held for charitable or religious purposes.	340
11(1)(Explanation)(3B)	Income from property held for charitable or religious purposes.	337(Table: S. No. 5)
11(1)(Explanation)(4)(i)	Income from property held for charitable or religious purposes.	341(4)
11(1)(Explanation)(4)(i)(Proviso)	Income from property held for charitable or religious purposes.	341(2)(a)
11(1)(Explanation)(4)(ii)	Income from property held for charitable or religious purposes.	341(4)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
11(1)(Explanation) (4)(ii) (Proviso)	Income from property held for charitable or religious purposes.	341(2)(b)
11(1)(Explanation) (4)(iii)	Income from property held for charitable or religious purposes.	341(1)(b)
11(1)(Explanation) (5)	Income from property held for charitable or religious purposes.	341(3)(b)
11(1A)	Income from property held for charitable or religious purposes.	Omitted
11(1B)	Income from property held for charitable or religious purposes.	Omitted
11(2)((a)	Income from property held for charitable or religious purposes.	342(1)
11(2)(b)	Income from property held for charitable or religious purposes.	342(4)
11(2)(c)	Income from property held for charitable or religious purposes.	342(1)
11(2)(Proviso)	Income from property held for charitable or religious purposes.	342(3)
11(2)(Explanation)	Income from property held for charitable or religious purposes.	342(2)
11(3)(a)	Income from property held for charitable or religious purposes.	337(Table: S. No. 6)
11(3)(b)	Income from property held for charitable or religious purposes.	337(Table: S. No. 4)
11(3)(c)	Income from property held for charitable or religious purposes.	337(Table: S. No. 8)
11(3)(d)	Income from property held for charitable or religious purposes.	337(Table: S. No.9)
11(3A)	Income from property held for charitable or religious purposes.	342(5)
11(3A)	Income from property held for charitable or religious purposes.	342(6)

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
11(3A)(1st Proviso)	Income from property held for charitable or religious purposes.	342(2)
11(3A)(2nd Proviso)	Income from property held for charitable or religious purposes.	342(7)
11(4)	Income from property held for charitable or religious purposes.	344
11(4A)	Income from property held for charitable or religious purposes.	345
11(5)	Income from property held for charitable or religious purposes.	350
11(6)	Income from property held for charitable or religious purposes.	341(3)(a)
11(7)	Income from property held for charitable or religious purposes.	333
11(Explanation)	Income from property held for charitable or religious purposes.	341(1)(a)(i)
12(1)	Income of trusts or institutions from contributions.	335(c)
12(2)	Income of trusts or institutions from contributions.	337(Table: S. No. 2)
12(3)	Income of trusts or institutions from contributions.	Redundant
12A(1)(ac)	Conditions for applicability of sections 11 and 12.	332(3)
12A(1)(ac)(Proviso)	Conditions for applicability of sections 11 and 12.	332(4)
12A(1)(ac)(Proviso)	Conditions for applicability of sections 11 and 12.	332(9)
12A(1)(b)	Conditions for applicability of sections 11 and 12.	347
12A(1)(b)	Conditions for applicability of sections 11 and 12.	348

Section Number of Income-tax Act, 1961	Section heading as per Income-tax Act, 1961	Section number as per latest draft
12A(1)(ba)	Conditions for applicability of sections 11 and 12.	349
12A(2)	Conditions for applicability of sections 11 and 12.	332(3)
12AA	Procedure for registration.	Omitted
12AB(1)	Procedure for fresh registration.	332(7)
12AB(2)	Procedure for fresh registration.	Redundant
12AB(3)	Procedure for fresh registration.	332(3)
12AB(4)	Procedure for fresh registration.	351(2)
12AB(4)(Explanation)	Procedure for fresh registration.	351(1)
12AB(5)	Procedure for fresh registration.	351(3)
12AC	Merger of charitable trusts or institutions in certain cases.	352(5)(Table: Sl. No. 8.B)

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