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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

\+ **ITA 244/2017**

THE COMMISSIONER OF INCOME
TAX-INTERNATIONAL TAXATION-2 ..... Appellant
Through: Mr. Ruchir Bhatia, Adv. with
Mr. Puneet Rai, Adv.

Versus

PANASONIC INDUSTRIAL ASIA PTE. LTD ..... Respondent
Through: Mr.Parth, Adv.

CORAM: JUSTICE S.MURALIDHAR
JUSTICE CHANDER SHEKHAR

<u>O R D E R</u>

% **24.04.2017**

1. This appeal, under Section 260A of the Income Tax Act, 1961 ('Act'), by the Revenue is against the order dated 16th September, 2016 passed by the Income Tax Appellate Tribunal ('ITAT') in ITA No. 6734/Del/2015 for the Assessment Year ('AY') 2008-09.

2. The question of law involves the exclusion of one of the comparables i.e., ICC International Agencies Ltd. for the purpose of determining the arm's length price of the international transaction for the purpose of transfer pricing analysis.

3. In the considered view of the Court, the reasoned order of the ITAT does not give rise to any substantial question of law. The appeal is dismissed.

S.MURALIDHAR, J

CHANDER SHEKHAR, J

APRIL 24, 2017
'anb'