HONOURABLE SRI JUSTICE V.RAMASUBRAMANIAN

AND

HONOURABLE SRI JUSTICE P. KESHAVA RAO

I.T.T.A.No.624 of 2018

ORDER: *(per V. Ramasubramanaian, J)*

The above appeal is preferred by the Revenue under Section 260A of the Income Tax Act, 1961, raising the following substantial questions of law.

> *"Whether in the facts and circumstances of the case and in law, the ITAT is correct in directing the Assessing Officer to exclude the expenditure incurred in foreign exchange towards professional charges, from both export turnover and total turnover though Explanation 2 to Section 10A of the Income Tax Act, 1961 clearly states that they need to be excluded from export turnover and no such reduction is provided for in relation to total turnover?*

2. Heard Mrs. K. Mamta Choudary, learned senior standing counsel for the appellant-Department.

3. The substantial question of law raised in the above appeal is squarely covered by a judgment of the Supreme Court in **Commissioner of Income Tax Central-III v. HCL Technologies Ltd.,[1].** Therefore, following the same, the appeal is dismissed.

As a sequel thereto, miscellaneous petitions, if any, pending shall stand closed.

V. RAMASUBRAMANIAN, J

P. KESHAVA RAO, J

Date: 27-12-2018

Ksn

[1] 2018 404 ITR 719