PALLAVI MAHENDRA WARGAONKAR Digitally signed by PALLAVI MAHENDRA WARGAONKAR Date: 2025.10.10 11:33:26 +0530

IN THE HIGH COURT OF JUDICATURE AT BOMBAY
ORDINARY ORIGINAL CIVIL JURISDICTION

INCOME TAX APPEAL(IT) NO. 72 OF 2024 (Sr. No.402)

Commissioner of Income Tax IT 4 ...Appellant
Versus
Renaissance Services BV ...Respondent

WITH
INCOME TAX APPEAL (IT) NO. 374 OF 2024 (Sr. No.405)

Commissioner Of Income Tax It 4 ...Appellant
Versus
Reliance Globalcom Ltd. ...Respondent

WITH
INCOME TAX APPEAL (IT) NO. 310 OF 2025 (Sr. No.438)

Commissioner of Income Tax It 4 ...Appellant
Versus
Shinhan Bank ...Respondent

WITH
INCOME TAX APPEAL (IT) NO. 343 OF 2025 (Sr. No.441)

Commissioner Of Income Tax It 4 ...Appellant
Versus
Reliance Globalcom Ltd. ...Respondent

Ms. Shilpa Goel for Appellant.

Mr. Paras Savla, Rajnandini Shukla, Harsh Shah and Pratik Poddar for Respondent.

Adv. Smit Shah for Respondent in ITXA/343/2025 and ITXA/310/2024.

CORAM : M.S. Sonak &
Advait M. Sethna, JJ.

DATED : 8 October 2025

P.C.:-

1. The Tax effect in both these Appeals is less than Rs.2 Crores.

2. Accordingly, in terms of the CBDT Circular, these Appeals ought not to be pursued by the Revenue. However, Ms. Goel, learned counsel for the Appellant reports no instructions.

3. Accordingly, we dispose of all these Appeals by leaving the questions of law open. However, if the Appellant find that the tax effect is greater than Rs.2 Crores or the Appeals fall within the excepted categories, the Appellants will have liberty to apply for restoration/revival. This is provided applications for restoration/revival are made within reasonable time i.e. on or before 31 January 2026.

4. All the Appeals are disposed of with liberty in the above terms.

(Advait M. Sethna, J) **(M. S. Sonak, J.)**