

Roll No.

12 MAY 2026

Total No. of Case Study Questions – 5

Total No. of Printed Pages – 48

Time Allowed – 4 Hours

Maximum Marks – 100



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Answers to questions are to be given only in English except in the case of candidates who have opted for Hindi Medium. If a candidate has not opted for Hindi Medium, his/her answers in Hindi will not be evaluated.

The Question Paper comprises five case study questions.

The candidate is required to answer any four case study questions out of five. The Candidate shall answer four Case Study Questions as selected by him/her in totality i.e., MCQs as well as descriptive Questions of the same four Case Study Questions.

The Candidate is not permitted to answer MCQs of one Case Study Question and the descriptive questions of another Case Study Question and vice-versa.

The candidates are required to choose the correct or most appropriate option in case of MCQs. Answer in respect of Multiple-Choice Questions (MCQs) are to be marked on the OMR Answer Sheet as given on the Cover Page of the Answer Book. Answer to MCQs, if written inside the descriptive answer book, will not be evaluated.

In case the Case Study Question pertains to Direct Taxes, assume the Assessment year 2026-27 unless otherwise stated in the question. Similarly, in case the Case Study Question pertains to Indirect Taxes, the Central Goods and Services Tax Act, 2017 and Integrated Goods and Services Tax Act, 2017 as amended by the Finance Act, 2025 shall be relevant.

Candidate found copying or receiving or giving any help or defying instructions of the invigilators or having/using mobile phone or smart watch or any other electronic gadget will be expelled from the examination and will also be liable for further punitive action.

Candidate may use calculator.

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CASE STUDY – 1

Heritage Tea Processing Limited (HTPL) is an unlisted company founded in 1980 under the visionary leadership of Shri Bal Krishnan. The company is headquartered in Bengaluru, Karnataka. The Heritage Tea Group was founded on the belief that tea has the power to dissolve differences, foster connection and bring people together. Now 'Chai pe Charcha' has become a normal phenomenon. The company owns several tea estates in West Bengal, Tamil Nadu and Karnataka. Initially focused solely on tea leaf production until 1990, as the popularity of the beverage grew, HTPL decided to broaden its business operations. While maintaining its plantation activities, the company expanded into tea blending, packaging and marketing to strengthen its market presence. Some estates of the company initially operated on plucking cycles of up to 10 days, instead of the ideal 5-6 days. This resulted in coarser leaves, lower out-turn ratios and higher factory rejection rates. Additionally, logistical inefficiencies, such as uncoordinated inter-estate dispatches and underutilized vehicles, led to increased idle hours and higher operational costs. Following a comprehensive cost rationalization and benchmarking exercise, the company standardized plucking cycles by implementing weekly schedules. Today, over 80% of estates maintain the optimal 5-6 days cycle. Logistic optimization measures, including clustered routing and shared vehicle usage, have further reduced idle time and optimized fuel costs.

Currently, the company operates a fully integrated tea blending and packaging operation, where at every stage, from tasting and quality inspection to blending and final packing is meticulously managed to ensure purity and preserve its aroma. HTPL's integrated tea manufacturing begins with sourcing high-quality tea leaves, both from its own plantations and selected suppliers in Sri Lanka. Each estate owned by HTPL is overseen by a superintendent and organized into divisions responsible for crop planting, manpower management and operations.

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Tea plucking is primarily manual, scheduled according to leaf maturity, rainfall and bush type. Harvested leaves are transported to the estate's CTC (Crush-Tear-Curl) or modern processing facilities, where maintaining leaf quality is critical to ensure consistent flavour and overall product quality. At the factory, tea leaves undergo primary processing, including withering, rolling, oxidation or fermentation, drying and grading, to produce tea with desired characteristics. Processed tea is then blended and packaged in retail or bulk formats, often using sustainable packaging solutions. The company distributes finished products via internal channels, wholesalers, retailers, direct-to-consumer outlets and international markets, offering pack sizes from 100 grams to 10 kilograms. Its customers include supermarkets, hotels and restaurants. Marketing and sales efforts, supported by feedback mechanisms, helps refine product quality and service. Sustainability practices are integrated throughout, converting by-products into compost, bio-energy, or secondary products, reducing environmental impact and enhancing brand reputation. The company has transitioned towards renewable energy by installing solar panels at its manufacturing units, significantly reducing reliance on conventional power sources and lowering its carbon footprint. These green energy initiatives generate approximately 30 lakh units of solar power annually, offsetting nearly 2,000 metric tons of CO₂ emissions. Demonstrating a long-term commitment to sustainability, the company integrates modern technology with environmentally responsible practices. Around 55-60% of finished products are packaged in recycled bags, supporting resource efficiency. Additionally, tea dust and other organic waste from processing are used as natural fertilisers, improving soil health and minimizing landfill waste.

The entry of new suppliers into the tea business is a major cause of concern for the company. These new players are intensifying competition, particularly on pricing. However, the company holds a strong competitive advantage through its superior product quality, state-of-the-art infrastructure and a robust research and

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development team that continuously introduces innovative tea flavour. The company offers personalized service to customers through dedicated order support, while actively collecting customer feedback via surveys and quality monitoring to refine its blends. Responding to changing consumer preferences and growing health consciousness, the company has expanded its product line since 2020 to include premium blends, organic teas and green tea, receiving a positive market response.

The Company's Board reflects a strong commitment to diversity through a balanced and independent composition. It includes an appropriate mix of Executive, Non-Executive and Independent Directors, each selected for their expertise and experience to enhance effective oversight and organizational performance. Mr. G. Krishnan has been serving as Chairman and Managing Director since 2010. With three manufacturing plants, one in Tamil Nadu and two in Karnataka, the Company has a strong presence in both domestic and international markets, offering over 180 Stock Keeping Units (SKUs) and enjoying recognition in more than 50 countries worldwide. Total employee strength at all the manufacturing facilities is 1500. The company has state-of-the-art machinery installed at each of its tea manufacturing and packing plants.

Mr. G. Krishnan attended an international business workshop in Mumbai, where successful business founders and CEOs from around the world shared practical insights on decision-making, business modelling and growth strategies. During the workshop, he attended a lecture by a renowned strategic analyst on the Business Model Canvas, which illustrated how it helps businesses map, design and develop robust models while addressing critical areas for success. Upon returning to the office, Mr. G. Krishnan shared his workshop experience at the Board meeting, highlighting key insights, innovative strategies and actionable recommendations and expressed his intention to develop the company's business model canvas to further streamline operations and identify growth opportunities.

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Unfortunately, a fire broke out at the Company's factory located in Kodagu, Karnataka on 5th August 2025, resulting in damage to inventories, machinery and equipment. Stock with a total cost of ₹ 1.20 crore was affected and damaged. Company has claimed ITC of ₹ 9.60 lakh on damaged stock in GSTR 3B filed for the month of July 2025. The damaged stock comprised raw materials, packing materials and finished goods; including bulk tea bags and retail cartons ready for dispatch. Machinery and equipment (15% Block) purchased on 1st February 2022 for ₹ 1.77 crore (exclusive of 18% IGST), were completely destroyed in the fire. The company has in place a reinstatement insurance policy covering loss or damage to its building, machinery and inventories due to fire. Against the loss of stock, the Company received insurance compensation of ₹ 1.05 crore and against the loss of machinery, it received ₹ 1.40 crore on 30th November 2025. In addition, the Company received equipment from the insurance company with a market value of ₹ 0.10 crore as compensation for the equipment destroyed by the fire and the same was put to use on 30th November 2025.

HTPL is maintaining a Tea Development Account with NABARD as per the scheme approved by Tea Board. The Written Down Value (WDV) of the machinery and equipment block (Rate of Depreciation: 15%) as per the Income-tax Act, 1961 is ₹ 120 crore as at 1st April 2025. Company placed an order for new machinery and equipment (15% Block) costing ₹ 2.50 crore on 10th August 2025 by withdrawing ₹ 5 crore from the Tea Development Account. HTPL made payment of ₹ 2.50 crore for the new machinery and equipment ordered on 10th August 2025, ₹ 0.05 crore for freight and installation charges, ₹ 0.50 crore spent on office furnishing and renovation (including computers for ₹ 0.25 crore installed in office) and ₹ 1.90 crore on installation of solar panels for use in the factory and plantation estates and the balance amount was not used. The machinery and equipment were installed and put to use on 15th November 2025. HTPL sold a parcel of land in November 2025 for ₹ 3 crore. The land had

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originally been acquired in January 2023 for ₹ 1.50 crore using funds withdrawn from the Tea Development Account, which were intended for the upgradation of the existing infrastructure of the company's unit. However, the company utilized these funds to purchase the land with the objective of constructing a warehouse. The proposed warehouse could not be developed due to the failure to obtain the necessary approvals from the local government authorities.

HTPL held 82% of the shares as at 1st April 2025 of ABC Valley Tea Limited, an unlisted public company engaged in tea manufacturing and trading, with the remaining 18% held by various minority shareholders, including individuals and institutional investors. Over a period of six months, HTPL gradually increased its stake, raising its holding to 91% of the total issued equity share capital by 30th September 2025. In October 2025, HTPL notified ABC Valley Tea Limited of its intention to acquire the remaining 9% of shares. Management of ABC Valley Tea Limited appointed a registered valuer to determine the fair value, who determined the price at ₹ 180 per share. However, the highest price paid by HTPL for any shares acquired in the preceding 12 months was ₹ 170 per share. A notice was sent to 30 minority shareholders. Out of these, 10 shareholders, collectively holding 78% of the minority shareholding entered into separate negotiations with HTPL, which agreed to acquire their shares at ₹ 190 per share, a price higher than the initially determined amount. The remaining 20 shareholders, representing the balance 22% of minority shares, were willing to sell at the original determined price.

At present, all packing materials are sourced from external suppliers. In response to the increasing demand for tea sachets and to ensure full control over their quality, shape and size, the management has decided to manufacture sachets in-house. Accordingly, an order was placed on 1st November 2025 for two customised tea sachet forming machines with CNC system and PLC controls (15% Block) from XYZ GmbH situated in Germany at a FOB price of Euro

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15,000 each to be despatched in first week of February 2026. The contract includes a price variation clause, under which the price of the machine will increase by 50% of the increase in material cost, if such increase of material cost exceeds 5%. Full payment will be made on or before 31st January 2026 before the despatch of machine.

The Finance Manager is considering various hedging strategies to mitigate currency risk in the current volatile foreign exchange environment. As of 1st November 2025, the spot exchange rate stands at ₹ 102 per Euro, with the three-month forward rate at ₹ 104 per Euro. Borrowing rates are 6% in Germany and 10% in India, while deposit rates are 4% and 7%, respectively. Additionally, the German branch of an Indian bank has offered credit at 6% per annum against the opening of an irrevocable letter of credit. Commission charges for issuance of letter of credit are at 2% per annum. The company currently utilizes cash credit and term loan facilities from its bank at an interest rate of 10% per annum. Interest is compounded monthly for borrowings and quarterly for deposits. The Finance Manager assigned CA. Arvind, newly appointed in the Finance Department with expertise in foreign exchange risk management, to analyse the exposure and recommend the most cost-effective hedging strategy. Based on his analysis, the company implemented the recommended hedge to manage its currency exchange risk.

Owing to a global rise in steel prices, XYZ GmbH increased the FOB price of the tea sachet forming machine by 3% over the previously agreed price. The Finance Manager received the email notification regarding the price revision on 25th January 2026 and the payment was made on 31st January 2026 in Euros, which were purchased in accordance with the hedging option selected by him. Exchange rate prescribed by RBI as on 31st January 2026 was ₹ 107 per Euro and exchange rate notified by CBIC was ₹ 106 per Euro. XYZ GmbH dispatched the machine by ship on 2nd February 2026. The ship carrying the machine arrived at Cochin

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Port on 6th March 2026 and the Bill of Entry was filed on 4th March 2026. Freight charges from Germany to India totalled Euro 5,000 and insurance charges of Euro 400 were paid on 31st January 2026. HTPL paid a commission of ₹ 1,61,300 to the local agent in India of the XYZ GmbH. Freight charges of ₹ 1,05,850 were paid to a local transport company for transporting the machine from Cochin Port to the factory situated at Kodagu, Karnataka. The machine was installed and put to use from 25th March 2026. The exchange rate notified by CBIC on the date of the Bill of Entry (04.03.2026) was ₹ 109 per Euro, while on the date of the ship's entry (06.03.2026) it was ₹ 108 per Euro. The Basic Customs Duty rate was 15% on the date of the Bill of Entry but was reduced to 10% with effect from 5th March 2026. The Social Welfare Surcharge is levied at 10% and the Integrated Tax (IGST) under the Customs Tariff Act, 1975 is 18%.

As part of its Corporate Social Responsibility obligations under the Companies Act, 2013, the Company purchased and distributed 2,000 educational kits comprising school bags, notebooks and stationery items to government schools in a rural area. In addition, the Company donated 250 Tablets to students of Government Aided Schools. The educational kits were procured in February 2026 from a local registered supplier for a total consideration of ₹ 12,90,000, inclusive of GST amounting to ₹ 90,000. The Tablets were purchased from a local registered supplier for ₹ 23,60,000, inclusive of GST amounting to ₹ 3,60,000. The Company claimed the input tax credit (ITC) of the GST paid on these purchases in its GSTR-3B return for the month of February 2026. The Chief Accountant of the Company, not being well-versed in the provisions and technical intricacies of Income Tax, GST and Customs law, engaged the services of CA. Abhinav, having vast experience in tax matters, to determine the correct amount of customs duty payable as well as correct admissibility or reversal of GST input tax credit (ITC) for the year and the depreciation allowable in accordance the provisions of the Income-tax Act, 1961.

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CA. Anmol is the Engagement Partner for the statutory audit of the company for the year 2025-26. During the pre-audit meeting, he discussed with the audit team the use of statistical sampling techniques and external confirmation procedures to obtain sufficient and appropriate audit evidence. He decided to apply the stratified sampling method for selecting debtors and creditors. Accordingly, he provided a list of 100 debtors and 80 creditors to the Chief Accountant for sending positive balance confirmation requests, instructing that responses should be sent directly to the auditor's official email ID. While reviewing the list submitted by CA. Anmol, the Chief Accountant identified 6 creditors with zero balances and suggested that confirmations either need not be sent to them or that negative balance confirmations could be sent. However, CA. Anmol directed that confirmation emails be sent to all selected parties as originally planned.

Within seven days, confirmation responses were received from 90 debtors and 74 creditors. Out of these confirmations received, 5 debtors' confirmations and 4 creditors' confirmations were not received from the registered email IDs on record and balance confirmations of 10 debtors and 6 creditors with zero balance were not obtained. Upon inquiry, the Chief Accountant informed CA. Anmol that physical letters had already been obtained from those debtors and creditors. During this review, Dinesh, a member of the audit team, observed that in the case of 4 creditors with zero balance, there were high volume transactions and nearly 15% of these transactions had been settled in cash.

Multiple Choice Questions

[Provide the correct or most appropriate option to the following questions]

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1.1. What is the total amount of Customs duty and Integrated-tax (IGST) payable under Custom law on import of machine from Germany ?

- (A) ₹ 4,52,980
- (B) ₹ 5,34,516
- (C) ₹ 12,75,756
- (D) ₹ 8,22,780

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1.2. Which statements correctly explain how CA. Anmol should respond to issues which have arisen during the balance confirmation process and how such issues may impact his audit opinion and reporting in accordance with the applicable Standards on Auditing ?

- (i) Investigate confirmations received from email addresses not on record, reconcile balances with the accounting records and perform alternative procedures such as reviewing subsequent receipts or payments to validate the balances.
- (ii) Reassess only the quantitative materiality in the light of unreliable confirmations and unusual cash transactions and disclose findings as Key Audit Matters only if the monetary amounts are large.
- (iii) Accept physical confirmations obtained by the Chief Accountant for debtors and creditors with zero balances as sufficient audit evidence and document them as the primary evidence for audit conclusions as the risk of material misstatement is low.
- (iv) Escalate any unresolved issues related to cash payments or non-responses for confirmations to 'Those charged with governance' and if sufficient appropriate audit evidence cannot be obtained, evaluate the impact on the financial statements and consider issuing a qualified opinion if limitation is material but not pervasive.

Options :

- (A) (i) and (ii)
- (B) (i) and (iv)
- (C) (ii) and (iii)
- (D) (i), (ii) and (iv)

- 1.3. What are the tax implications of the amount withdrawn from the Tea Development Account and the sale of land for Assessment Year 2026-27 in accordance with the provisions of the Income-tax Act, 1961 ?
- (A) ₹ 0.30 crore shall be taxable as business income and ₹ 1.50 crore shall be taxable as long-term capital gain.
- (B) ₹ 0.72 crore shall be taxable as business income and ₹ 0.60 crore shall be taxable as long-term capital gain.
- (C) ₹ 0.82 crore shall be taxable as business income and ₹ 0.60 crore shall be taxable as long-term capital gain.
- (D) ₹ 0.12 crore shall be taxable as business income and ₹ 1.50 crore shall be taxable as long-term capital gain.
- 1.4. What is the total amount of GST Input Tax Credit (ITC) required to be reversed under the provisions of the CGST Act, 2017, as computed by CA Abhinav ?
- (A) ₹ 45,96,000 (B) ₹ 23,12,700
- (C) ₹ 28,43,700 (D) ₹ 14,10,000
- 1.5. Which of the following statements are correct as per the relevant provisions of Companies Act, 2013 ?
- (i) Offer price for acquisition of shares of ABC Valley Tea Limited should be the price determined by registered valuer based on fair price of shares of the company and the highest price offered by HTPL for acquisition of shares in last twelve months.
- (ii) Payment to all the 30 shareholders will be made at a price of ₹ 190 per share negotiated with 10 shareholders.
- (iii) Additional consideration received by 10 shareholders shall be shared with 20 shareholders on a pro- rata basis.

CASE STUDY – 2

Heritage Organic Limited (Heritage) has been founded by Mr. Sumit Joshi in the State of Uttarakhand. The Company has built its reputation on traditional methods and unbending quality products. The Company is an esteemed name in the food and beverage industry, with its product ranging from aged balsamic vinegars, freshly fermented sauces and premium craft spirits. The flagship product of the company, the “Joshi Farm Fresh Balsamic Vinegar”, is renowned for its composite flavour profile. The product is the result of being aged for over 25 years in a series of gradually handcrafted smaller wooden barrels.

Over the past few years, under the leadership of Sumit’s grandson, Roshan Joshi, Heritage Organic has gone for a rapid expansion. The company has expanded its product line and distribution network and has also appointed new dealers. The company’s products are now available for online sale on all popular e-commerce sites. However, this growth has come at a cost. The once-pristine manufacturing process, rooted in manual craftsmanship, under one-roof has now been strained by a series of hasty and at times, unplanned expansions. The company’s operations are now spread across three separate facilities located at three different industrial parks, spread over the entire state.

Roshan has divided the entire process into three stages and has dedicated each facility for each stage. The first facility has been fermentation and aging of the product using the same traditional method. The second facility is used for bottling and packaging of the finished product in wooden barrels and the last facility is used for storage, distribution and e-marketing. This multi-facility setup has led to challenges in coordination and logistics.

Roshan has formed a team of experts to conduct an internal audit of the entire process. This team in its report has revealed a number of operational inefficiencies. The audit team has emphasized on the following inefficiencies :

1. The process of moving partially-aged products from the fermentation facility to the ageing facility, involves an outdated labour-intensive process which consumes substantial time.
2. The Company's flagship product, balsamic vinegar barrels are often left unattended in a staging area, as the forklift operators are often engaged with other unproductive tasks.
3. The finished bottled spirits, once they leave the bottling line, are moved to a temporary holding bay where they are waiting for quality control checks, which can sometimes be delayed due to shortage of inspectors. This waiting time is a major bottleneck.
4. The quality control procedure involves a thorough inspection of 10% of the total produce, consumes significant time and human resource.
5. The company's storage facility is completely disorganised, with finished goods often spending long periods in warehouse before being dispatched to the distributors.
6. The production line for different products is also in a haphazard state due to unscheduled machine maintenance. This often leads to production delay.

While highlighting these issues, the internal audit report has not quantified the actual financial impact on overall performance of the company. As the report got published, Roshan, who is a firm believer in the company's traditions, has come under tremendous pressure from the other Board members. The Board members believe that the traditional artisanal process is no longer relevant as it is not only squeezing the margins of the company but also affecting the market share which the company has previously enjoyed.

Heritage Organic's finances have been strong. The company's capital structure consisted of 1.50 crore equity shares with capital and reserves and surplus of ₹ 300 crore and a net debt of ₹ 400 crore, thus, maintaining a healthy debt-equity

ratio. The company has also reported the Profit Before Interest and Tax (PBIT) of ₹ 120 crore for the preceding financial year. The average tax rate is 30%. The cost of equity is projected to be 14% and while the pre-tax cost of debt is 10%. In a bid to have a global footprint, Heritage Organic, entered into a strategic partnership with a German distributor. As part of this arrangement, the German distributor will pay a certain percentage of the sales revenue as a “Brand Royalty Fee” to Heritage Organic. This royalty fee is subject to Indian tax laws. However, the tax law regarding the classification of this income is unclear and there is a potential for a prolonged dispute with the income-tax authorities. In order to avoid future tax litigations, the company’s legal and tax advisors have suggested to the Board to seek an opinion from the Income-tax Department. The Company’s management is also equally concerned about the potential tax liability and the uncertainty it could create for the long-term partnership with the German firm. So, as advised by the legal team and the Board, Roshan decided to file an application to the Board for Advance Rulings. Roshan wants a definitive ruling that will provide a legal shield and remove all uncertainty for their international transaction with the German company.

During the financial year 2025-26, the Heritage has sponsored a sports event for farmers conducted by a Farmers Friendly Club in Nainital. The said club was established in the year 2024 for protecting and promoting the rights of farmers. The company paid ₹ 25 lakhs for sponsoring the event.

Roshan has received a proposal for strategic partnership from Ms. Geeta Sharma of Shrey Industries Private Limited which is a rapidly growing company with a diverse portfolio which includes organic textiles, sustainable agriculture and eco-friendly packaging, all covered under one roof. Ms. Sharma sees an opportunity in premium food and beverage market as the next edge for expansion. In order to diversify its product line and increase the company’s market share, Ms. Sharma does not see Heritage Organic as a competitor, but as a strategic partner that

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aligns perfectly with Shrey Industries' brand philosophy of long-term growth and sustainable legacy. Ms. Sharma has approached Roshan with a comprehensive acquisition offer. The offer is for strategic partnership wherein Roshan would retain a significant stake in the company and continue to lead the Board. To arrive at a fair price, Ms. Sharma appointed a team to conduct a meticulous valuation of the target company.

As per the advisors of Shrey Industries, the industry's average P/E Ratio is 15. Heritage Organic's future maintainable profit after taxes is estimated to be ₹ 98 crores, while the future maintainable earnings per share (EPS) is estimated at ₹ 6.50. However, since Heritage Organic is an unlisted company, the analysts believe a downward adjustment of 20% is necessary to account for the additional risk of non-listing.

The Board of Heritage Organic has made a detailed plan on how Shrey Industries' expertise in supply chain management and their team will help in eliminating the non-value-added activities in its operations, which would significantly increase its future cash flows.

During a GST audit for the financial year 2023-24 conducted by the GST Department in February 2026 at the premises of Shrey Industries Private Limited, the GST officer has identified three instances where input tax credit (ITC) was either incorrectly claimed or not admissible: first, an IGST ITC claim of ₹ 150 lakh was made in the March 2024 GSTR-3B filed on 18th April 2024 based on invoices dated 30th March 2024 and reflected in GSTR-2B, but transport documents showed that the goods were physically received at the warehouse only on 4th April 2024, leading the Superintendent to allege that the credit was claimed prematurely as the goods were not received during the March 2024 tax period; second, ITC of ₹ 2.70 lakh was claimed in November 2023 on outdoor catering services availed for a marketing event organized for existing and

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prospective dealers and third, in October 2023, the company gifted home appliances worth ₹ 15,000 each to its 200 employees and ₹ 5,000 each to 500 workers, with a total market value of ₹ 55 lakh (excluding GST) and subject to GST at 18% (9% CGST and 9 % SGST), prompting the Superintendent to issue a demand for tax, interest and penalties. To address the dispute, the Chief Accountant seeks advice from CA. Gaurav, an indirect tax specialist, who upon reviewing the company's Electronic Credit Ledger observed that even after filing the March 2024 GSTR-3B, the company had a remaining ITC balance of ₹ 120 lakh, comprising ₹ 60 lakh in CGST and ₹ 60 lakh in SGST.

The management of Heritage is also planning to enter into a new venture of manufacturing electric motors for EV two-wheelers as they feel that with the improved roads, the demand for EV two-wheelers is increasing day-by-day. To assess the financial feasibility of the venture, the Board tasked the Costing department with collecting and analysing relevant data on market prices and production costs. Based on market research, the department found that the expected selling price per unit would be ₹ 7,500, with a direct material cost of ₹ 6,200 per unit, direct labour cost of ₹ 240 per hour and variable overheads of ₹ 160 per hour. Labour efficiency is projected to improve as production increases due to a 90% learning curve effect (learning index = -0.1520). The first batch of 100 units is estimated to require 250 labour hours, with the learning effect expected to continue until 1000 units (10 batches) have been produced. Beyond this level, the learning effect will plateau and each subsequent batch will require same labour time as the 10th batch. The batch size will remain constant at 100 units. The company is in negotiation with EV two-wheeler manufacturer and is assured of order for 5,000 units at a price of ₹ 7,200 per unit for the year 2026-27. It is anticipated that 5,000 electric motors will be produced and sold during this period. (Note $10^{-0.1520} = 0.705$ and $9^{-0.1520} = 0.716$)

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Heritage Organic is proposing buy-back of its shares. The company would buy 10 lakh equity shares for ₹ 150 per share. All the shares were issued at face value of ₹ 10 each about 16 years ago. For making this offer, the company wants to seek the opinion of its tax counsel about the taxability of buy back for shareholders and the obligations of the company.

Multiple Choice Questions

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[Provide the correct or most appropriate option to the following questions]

2.1. Shrey Industries analysts are calculating the value of Heritage Organic using the capitalisation of earnings method. Given the capitalization rate of 14%, what would be the value of the business ?

(A) ₹ 700 crore

(B) ₹ 980 crore

(C) ₹ 560 crore

(D) ₹ 630 crore

2.2. In the context of the advance ruling sought by Heritage Organic, with the Board for Advance Rulings, which of the following statements is incorrect ?

(A) The transaction value of Heritage Organic must exceed ₹ 100 crore for seeking a ruling.

(B) The Board has to pronounce its ruling within six month of the receipt of the application.

(C) The applicant Heritage Organic cannot appeal against the ruling.

(D) The Board can call for record before pronouncing its ruling.

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2.3. Which of the following statement is correct in respect of the sponsorship of the event organised for farmers by the Farmers Friendly Club in Nainital ?

- (A) GST is payable by the Heritage, being the recipient of the sponsorship service, under the reverse charge mechanism.
- (B) GST is payable by the Club, being the supplier of the sponsorship service.
- (C) GST is exempt in respect of sponsorship services for farmers.
- (D) GST is exempt in respect of sponsorship of sports event.

2.4. What is the expected total variable cost of producing 5,000 electric motors in 2026-27 ?

- (A) ₹ 345.80 lakh
- (B) ₹ 340.30 lakh
- (C) ₹ 341.29 lakh
- (D) ₹ 345.25 lakh

2.5. Based on the provisions of non-value-added activities, which of the following is the most accurate classification of the delays experienced by Heritage Organic's bottled spirits waiting for quality control checks ?

- (A) Storing
- (B) Moving
- (C) Waiting
- (D) Inspecting

Descriptive Questions :

2.6. Roshan Joshi believes that the operational inefficiencies in Heritage Organic are a necessary part of the artisanal process. However, Geeta Sharma plans to eliminate them. Based on the information in the given scenario, explain which of the identified 'Non-Value-Added' activities can be eliminated and what will be its strategic implication ?

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- 2.7. As tax counsel of Heritage, prepare a brief note of the Income-tax consequence of the buy-back of shares in the hands of the shareholders and company and its obligations. 4
- 2.8. In light of the issues raised by the GST officer, what advice should CA Gaurav give to the company, with reference to the relevant provisions of the CGST Act, 2017, regarding tax liability, admissibility of input tax credit and the implications relating to interest and penalties ? 6

CASE STUDY - 3

Harcharan Ceramics Limited (HCL) enjoys the reputation of being one of the best companies in South India to offer end to end lifestyle solutions to Wall and Floor Tiles, Sanitaryware & Bath Fittings, Engineered Marble and Quartz for different Residential, Commercial and Industrial Spaces. With more than six decades of pioneering innovations and expertise, HCL offers a wide array of products for diversified application and usages. HCL operates from Mysore and has its manufacturing plants throughout Karnataka. It has a couple of wholly owned subsidiaries in its corporate portfolio.

Very often, HCL is engaged in strategic acquisitions to expand its business portfolio. As part of its growth strategy, on 1st January 2025, HCL acquired entire share capital of Savreen Ceramics Limited (SCL) for ₹ 1500 lakhs. The book values and the fair values of the identifiable assets and liabilities of SCL on the date of acquisition are set out below, together with their tax bases. Any goodwill arising on the acquisitions is not deductible for tax purposes. The tax rate is 30%.

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₹ in Lakhs

Net Assets Acquired	Book Values	Tax Base	Fair Values
Land and Buildings	600	500	700
Property, Plant and Equipment	250	200	270
Inventory	100	100	80
Accounts Receivable	150	150	150
Cash and Cash Equivalents	130	130	130
Total Assets	1,230	1,080	1,330
Accounts Payable	(160)	(160)	(160)
Retirement Benefit Obligations	(100)	-	(100)
Net Assets before Deferred Tax Liability	970	920	1,070
Deferred Tax Liability on differences between Book Values and Tax Bases (₹ 50 @ 30%)	(15)		
Net Assets at Acquisition	955	920	1,070

Harnam Singh Ceramic Tiles Limited (HSCTL) is one of the subsidiaries of Harcharan Ceramics Limited (HCL). All the three directors of HCL are also the directors of HSCTL. However, the three directors have been disqualified under the Companies Act, 2013 as HSCTL has defaulted in filing its financial statements for three financial years. Hariharan Singh, the Promoter of HCL wants to have the directors' vacancy filled up so that the Company's operations could go on without hindrance.

Another subsidiary of HCL namely Harkaran Innovative Tiles Limited (HITL) wants to pay remuneration to its Managing Director and CEO namely, Mr. Nanak Dev Singh in excess of the limits specified in Schedule V of the Companies Act, 2013 as the Company does not have adequate profits. The Company has defaulted

in payment of dues to Banks as well as to Non-Convertible debenture holders. It may be noted that the term of office of Mr. Nanak Dev Singh expires by April 10th, 2026. CA. Amanpreet Singh has been appointed as the Statutory Auditor of HITL for a period of five years at the AGM of the Company held on 29th September 2025. While drafting audit letter communicating the key points of audit to 'Those Charged with Governance' and Audit Committee, CA. Amanpreet Singh is contemplating whether he needs to generate a Unique Document Identification Number (UDIN). Mr. Ronnie Coleman is a European, having vast experience of more than three decades in all gamut of Marble, Granite and Tiles Manufacturing and Sales throughout Europe. Having heard of the reputation and cost effective quality products of HCL in India, he wanted to have business dealings with HCL in India for his latest, innovative, digital 3D Wall and Floor Tiles. In this regard, he is desirous of knowing the conveyance, clearance and warehousing procedures under the Indian Customs Law from the point of import of goods into India.

HCL has purchased certain state-of-the art new machines on 23rd November 2024 for US\$ 1,00,000 when the exchange rate per US dollar was ₹ 84. As on 31st March 2025, the exchange rate was ₹ 86 per US \$. HCL made the payment on 5th June 2025 when the exchange rate was ₹ 86.50 per US\$.

HCL has proposed a new foreign investment which involves creation of a plant with an annual output of 1 million units. The entire production will be exported at a selling price of USD 10 per unit. At the current rate of exchange, dollar cost of local production equals to USD 6 per unit. Dollar is expected to decline by 10% or 15%.

The change in local cost of production and probability from the expected current level will be as follows:

Decline in value of USD (%)	Reduction in local cost of production (USD/ unit)	Probability
0	—	0.40
10	0.30	0.40
15	0.15 Additional Reduction	0.20

The plant at the current rate of exchange will have a depreciation of USD 1 million annually. Assume local tax rate as 30%.

HCL has preferred an appeal against certain additions relating to Assessment Year 2023-24 before Commissioner of Income-tax (Appeals) and has not contested a few other additions made to the returned income in the assessment made in regular assessment of the Income-tax Act, 1961. When the appeal was pending disposal, the Commissioner of Income-tax invoked its revisionary powers in respect of other issues which have not been dealt with in the assessment order. The tax counsel has opined that the doctrine of total merger would apply and therefore, the revision proposed is bad in law. For the Assessment Year 2024-25, the Assessing Officer made an addition of ₹ 150 lakhs on account of excess depreciation and ₹ 120 lakhs by way of disallowance under Section 40A (2) of the Act. HCL filed an appeal before the CIT(A) against the denial of depreciation and on being unsuccessful, filed a further appeal before the Appellate Tribunal. In respect of the disallowance under Section 40A (2) of the Act, it did not file any appeal but filed a revision petition before the Commissioner of Income-tax who dismissed it on the ground that the assessment is a subject matter of appeal before the Appellate Tribunal. The tax counsel opined that the action of the Commissioner is not tenable in law.

Multiple Choice Questions

5×2

[Provide the correct or most appropriate option to the following questions]

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3.1. In the absence of any director available in HCL, can Hariharan Singh, as the Promoter of HCL, proceed with the appointment of required number of fresh directors ? Choose the incorrect option(s) from the following :

- (i) Hariharan Singh cannot proceed with the appointment of fresh directors.
- (ii) Hariharan Singh as Promoter of the Company can proceed with the appointment of required number of fresh directors.
- (iii) Hariharan Singh can proceed with the appointments of fresh directors after getting the prior consent of the three directors who have been disqualified.
- (iv) Hariharan Singh can proceed with the appointments of fresh directors after getting the prior consent of any two directors out of three directors who have been disqualified.

Options :

- (A) (i) and (ii)
- (B) (iii) and (iv)
- (C) (i), (iii) and (iv)
- (D) (ii)

3.2. Harkaran Innovative Tiles Limited (HITL) wants to pay remuneration to its Managing Director, namely Mr. Nanak Dev Singh in excess of the limits specified in the Companies Act, 2013. In view of the facts given in the case study, which is the correct legal position from the following ?

- (A) Prior approval of the concerned banks and the non-convertible debenture-holders before placing the special resolution, before the shareholders at the general meeting.

3.4. Mr. Ronnie Coleman is desirous of knowing the conveyance, clearance and warehousing procedures under the Indian Customs law from the point of import of goods into India. Outline the sequence of procedure for import of goods into India from the following:

- (i) Grant of Entry Inwards to Vessel
- (ii) Filing of import General Manifest
- (iii) Uploading of Goods
- (iv) Assessment of Goods
- (v) Filing of Bill of Entry
- (vi) Payment of Duty.

Options :

- (A) (i), (ii), (iii), (iv) (v) and (vi).
- (B) (ii), (iii), (i), (iv), (v) and (vi).
- (C) (iii), (ii), (i), (vi), (v) and (iv).
- (D) (ii), (i), (iii), (v), (iv) and (vi).

3.5. In respect of the state of the art new machines purchased by HCL in foreign currency, how much will be the foreign exchange loss/gain for the financial year 2024-25 and financial year 2025-26 as per the relevant Ind AS ?

- (A) F.Y. 2024-25 - Loss of ₹ 2,00,000 and F.Y. 2025-26 - Loss of ₹ 50,000.
- (B) F.Y. 2024-25 - Gain of ₹ 2,00,000 and F.Y. 2025-26 - Gain of ₹ 50,000.
- (C) F.Y. 2024-25 - Gain of ₹ 2,00,000 and F.Y. 2025-26 - Loss of ₹ 50,000.
- (D) F.Y. 2024-25 - Loss of ₹ 2,00,000 and F.Y. 2025-26 - Gain of ₹ 50,000.

Descriptive Questions :

- 3.6. HCL requires you to calculate "Deferred tax" arising on acquisition of SCL and the goodwill arising thereon. **4**
- 3.7. HCL has proposed a new foreign investment which involves creation of a plant with an annual output of 1 million units. Taking into consideration the other inputs given in the case study above, you are requested to find out: **6**
- (i) Annual Cash Flow after Tax (CFAT) under all the different scenarios of exchange rate.
 - (ii) Expected value of CFAT assuming no repatriation of profits.
 - (iii) Viability of the investment proposal on the basis of CFAT arrived under option (ii) assuming an initial investment of USD 25 million on plant and working capital with a required rate of return of 11% on investment. The CFAT will grow @ 3% per annum in perpetuity.
- 3.8. Decide the correctness of the views of the Tax Counsel and suggest the course of action to be pursued by the Company in respect of the Income-tax appeals preferred by HCL before the CIT(A) for the A.Y. 2023-24 and an appeal for the Assessment Year 2024-25 before the Appellate Tribunal. **5**

CASE STUDY – 4

Vinod Heavy Industries Ltd. (VHIL) is a listed, esteemed conglomerate, having its head office in an industrial town of Gujarat. Inspired by "Make in India", an initiative of the Government of India, the company engaged itself in manufacturing components for large-scale infrastructure projects like mining, heavy industrial machinery and sea-link building equipment for companies all across the globe. VHIL has an extensive manufacturing complex, an in-house dedicated R&D division and a robust client portfolio (both national and international) which includes government projects, mining corporations and

heavy construction firms. Despite working in a duopoly market, VHIL operated on narrow profit margin, which is the basic characteristic of an infra company. Being in a highly capital-intensive infrastructure sector, the company requires continuous investment in advanced machinery and other equipments and therefore, the company is regularly tapping the capital markets by issuing bonds and debentures to meet its working capital needs.

VHIL also aimed to expand its operations while adopting the Triple Bottom Line (TBL) approach. The company wants to balance its goals in sustainable technologies and has approved an initial investment of ₹ 50 crore. The company plans to enhance its image by recruiting 200 people from the local community. The company also wants to reduce its carbon footprint by 20% in the next 2 years. This development is being keenly watched by company's stakeholders, employees and local communities.

In order to achieve its goal, an independent advisor has given two options to the company's Board:

Option A: The Company can invest in advanced recycling technologies thus, focusing on economic growth and environmental sustainability.

Option B: The Company can develop a community-based waste management program which prioritises social impact and environmental benefits.

VHIL also required a short-term credit facility of ₹ 100 crore for a period of 3 months. Anticipating a temporary spike in interest rates, VHIL entered into a 6 × 9 Forward Rate Agreement (FRA) with Easy Infra Credit Limited (EICL). The actual MIBOR on the date of contract (1st October 2025) was 8.10% per annum. However, since the company was a regular client of EICL, they mutually decided to agree upon a Forward Rate (FR) of 7.80% per annum.

Meanwhile, VHIL's management wanted to diversify the company's business beyond manufacturing. The company was facing regular delays in transporting its products to its domestic as well as international clients due to lack of adequate heavy trucks, shipping containers and other logistic support. So, the company

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decided to take over VCL Logistics Ltd. (VLL), a prominent logistic and cargo handling company based in the port city of Kandla, Gujarat. VLL, though possessing a valuable inland network and fleet, has been facing with significant financial distress due to inexperienced management, complicated regulatory compliances related to international shipping, unstable fuel prices and intense competition both nationally and internationally. VHIL planned to integrate VLL's logistics abilities to restructure its supply chain for transporting its assembled products to the end users.

The company is having a unit named 'Metal Cast Division' which produces various components required for infrastructure machinery. The following information is being provided :

RAW MATERIAL

Closing Stock	1400 units
Cost Price	₹ 70 per unit
Replacement Cost	₹ 40 per unit

FINISHED PRODUCT	PRODUCT 1	PRODUCT 2
Production	6,000 units	3,200 units
Closing Stock	500 units	300 units

Material Consumed	₹ 6,40,000
Direct Labour	₹ 3,20,000
Direct Expenses	₹ 1,56,000
Fixed Overheads	₹ 1,90,000 (including godown rent of ₹ 30,000. Godown is used for storing finished products).

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Besides 2 Main Products, 1,000 units of a By-product also emerged in the production process which was sold at ₹ 24 per unit after meeting an expenditure of ₹ 5,000. Further, ₹ 9,600 was realized from sale of scrap. The average market price of Finished Product 1 is ₹ 320 per unit and for Finished Product 2 is ₹ 200 per unit.

A scheme of arrangement was proposed by VHIL for the amalgamation of VLL into VHIL as per the Companies Act, 2013. Promoters of both the Companies entered into a binding agreement. The acquisition was to be made through issue of equity shares to the shareholders of the said target company, as per the valuer's report and SEBI regulations. The scheme was presented to the National Company Law Tribunal (NCLT). As part of the process, VHIL made all necessary disclosures and submitted its latest financial position along with auditor's report and other annexures to the appropriate authority. The scheme also included an option for the conversion of VLL's outstanding preference shares into equity shares of VHIL, as per the valuer's report. The preference shareholders also had an option to receive arrears of dividend either in cash or equivalent equity shares of VHIL.

VHIL approached the NCLT for necessary directions and approvals. The NCLT appointed an observer and directed VHIL to call for an extraordinary general meeting of VLL's shareholders and creditors. As directed, an EGM was convened on 15th March 2025, under the guidance of the observer, as appointed by the Tribunal. VLL had 50,00,000 equity shares, aggregating to a paid-up capital of ₹ 5,00,00,000. The total number of shareholders on the record date was 1200. Out of total, 800 shareholders holding 35,00,000 equity shares of the company attended this meeting. The voting data revealed that, out of these 800 shareholders, 650 shareholders holding 28,00,000 shares voted in favour of the scheme. While 100 shareholders holding 4,00,000 shares voted against it. The remaining shareholders abstained.

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A group of VLL's equity shareholders, holding 8% of the total equity share capital, voted against the resolution. As over 90% of the shareholders of VLL have already voted for the resolution proposed by VHIL, the acquirer company issued notice dated 10th April 2025, to all the dissenting shareholders, expressing its intention to acquire their equity shares as per the provisions of the Companies Act, 2013. However, these dissenting shareholders filed an application with the NCLAT on 5th May 2025, seeking an immediate stay on the proposed amalgamation. The NCLAT, after giving due opportunity to both the parties to present their cases, dismissed the application filed by the dissenting shareholders, on 20th June 2025. VHIL, thus, on receipt of the final order from the NCLAT, acquired 75% of the shares held by these dissenting shareholders. R & Co. LLP, a reputed audit firm, are the statutory auditors of VHIL. After auditing the financial statements of VHIL, the auditors have found material misstatement related to the valuation of certain long-term investments made by the company as on 31st March 2025. So, after due deliberation with the management of the company, the auditors issued a qualified audit report dated 1st June 2025.

In order to further expand its business and meet the working capital requirements, in July 2025, VHIL approached a consortium of public sector banks for a new credit facility. The consortium demanded from VHIL, an audited specific element of the financial statement related to "Trade Receivables from Government Contracts" for the same period and the report was to be prepared by the company's auditors in accordance with a special purpose framework tailored to the loan agreement. VHIL also requested R & Co. LLP to prepare a summary financial statement for the year ended 31st March 2025. The report was to be dated 15th July 2025. The company required the said report for public distribution. The statement for "Trade Receivables from Government Contracts," was prepared by the finance department of VHIL. The company was of the opinion that the summary financial statements could be presented without making all the general disclosures, as the same was being accompanied by full audit report.

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VHIL's intrusion into automated tunnelling machinery is quantum leap in market expansion besides product diversification. The tunnelling machinery is a product of latest technology which is much sought after even on lease basis in many mega infrastructure products. The marketing team explored a new potential market in Africa and obtained market research report from various sources. While the Company wants to launch its tunnelling machine with a huge fanfare, there is another view to allow lease of machines by incorporating a subsidiary company in the new market. 2 market research firms gave a report that there is no similar high end product. However, contrary reports were received such as customers are conservative, there are already strong players hence, it would be a Me-too product or it is a evolutionary product. The management of VHIL wants you to prepare a comprehensive pricing strategy including the impact of entering into joint venture with a local player. Though, the NCLT's dismissal of the dissenting shareholders' application on 20th June 2025 has given control to VHIL over VLL, yet the company still has some minority shareholders which are required to be managed. This partial acquisition made by the company increased the compliance burden and highlighted the complexities of corporate amalgamation and the subtle balance between majority control and minority shareholder rights and interference in quick decision-making process.

Multiple Choice Questions

5×2

[Provide the correct or most appropriate option to the following questions]

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- 4.1. VHIL entered into a 6×9 Forward Rate Agreement (FRA) with EICL. Calculate the settlement amount (profit/loss) for VHIL. (Assume 360 days in a year and 30 days in a month).
- (A) ₹ 7,35,114 (Profit)
(B) ₹ 7,50,827 (Profit)
(C) ₹ 7,35,114 (Loss)
(D) ₹ 7,50,827 (Loss)

4.2. In the amalgamation scheme of VLL into VHIL, was the scheme approved by the requisite majority as per the provisions of the Companies Act, 2013 ?

- (A) Yes, because the number of members voting in favour is more than 400 and the value of shares voting in favour is more than 22,00,000.
- (B) Yes, because the number of members voting in favour is more than 600 and the value of shares voting in favour is more than 26,25,000.
- (C) Yes, because the number of members voting in favour is more than 375 and the value of shares voting in favour is more than 24,00,000.
- (D) Yes, because the number of members voting in favour is more than 375 and the value of shares voting in favour is more than 25,00,000.

4.3. R & Co. LLP issued a qualified opinion on VHIL's complete financial statements for FY 2024-25 due to a material misstatement in long-term investments. Subsequently, VHIL requested R & Co. LLP to audit "Trade Receivables from Government Contracts" for the same period, which constitutes a significant but not major portion of VHIL's total assets. This specific audit is for a new credit facility and is prepared under a special purpose framework. Which of the following statements is most accurate regarding R & Co. LLP's ability to express an unmodified opinion on "Trade Receivables from Government Contracts" ?

- (A) R & Co. LLP cannot express an unmodified opinion on "Trade Receivables from Government Contracts" because they issued a qualified opinion on the complete set of financial statements.
- (B) R & Co. LLP can express an unmodified opinion on "Trade Receivables from Government Contracts" only if the report is not published together with the qualified opinion on the complete set of financial statements.

- (C) R & Co. LLP can express an unmodified opinion on "Trade Receivables from Government Contracts" provided it does not constitute a major portion of the entity's complete set of financial statements and the report is not published together with the qualified opinion.
- (D) R & Co. LLP can express an unmodified opinion on "Trade Receivables from Government Contracts" regardless of its proportion to total assets or publishing together with the qualified opinion, as it's a separate engagement.
- 4.4. In the amalgamation scheme, VHIL has acquired more than 90% of the shares of the company VLL. VHIL has further acquired shares of the dissenting shareholders of VLL after dismissal of their application by NCLT and there still remains dissenting shareholders who continues to hold. What action VHIL should take to overcome dissenting shareholders ?
- (A) No action is required because VHIL has acquired a substantial majority of shares in VLL.
- (B) Yes, action is required because once the NCLT dismisses the dissenting shareholders' application, VHIL is bound to acquire all the remaining shares of the dissenting shareholders at the rate as determined by the registered valuer as per rules.
- (C) No action is required because the Companies Act, 2013 allows for partial acquisition of dissenting shares at the transferee company's discretion.
- (D) No action is required because the dissenting shareholders should have been given an exit option before the NCLT dismissal.

- 4.5. R & Co. LLP was the statutory auditor for VHIL's Full Financial Statements for FY 2024-25, issuing a qualified opinion dated 1st June 2025. They were also engaged to audit Summary Financial Statements for the same period, with a report dated 15th July 2025. What additional reporting responsibility does R & Co. LLP have in their report on the Summary Financial Statements due to the difference in report dates and the qualified opinion on the Full Financial Statements ?
- (A) R & Co. LLP must state that the summary financial statements do not reflect events subsequent to July 15th, 2025 and also describe the basis for the qualified opinion on the audited financial statements.
- (B) R & Co. LLP must state that the Summary Financial Statements do not reflect events subsequent to 1st June 2025 and also describe the basis for the qualified opinion on the audited financial statements.
- (C) R & Co. LLP must re-audit the full financial statements up to 1st June 2025, before issuing the summary report.
- (D) R & Co. LLP must re-audit the full financial statements up to 15th July 2025, before issuing the summary report.

Descriptive Questions

- 4.6. With reference to the inputs given for one of the operating segments of VHIL namely 'Metal Cast Division', calculate the value of closing stock as per relevant Ind AS on 'Inventories' ? **5**
- 4.7. R & Co. LLP is the statutory auditor for VHIL's full financial statements. VHIL has requested R & Co. LLP to audit a specific element, "Trade Receivables from Government Contracts", for the same period, prepared under a special purpose framework. Discuss the key considerations R & Co. LLP must bear in mind regarding the acceptance, planning and performance of this engagement, especially given their existing role as statutory auditor for the full financial statements. **5**
- 4.8. Prepare a pricing strategy to be followed by VHIL based on various contradictory reports received as regards gaining foothold in an African Country. **5**

CASE STUDY – 5

India's aviation industry has witnessed significant expansion, emerging as the world's third-largest aviation market by 2025. After a severe downturn in FY 2020-21 due to the pandemic, the sector rebounded strongly by FY 2024-25, supported by affordable fares, a rising middle class and improved connectivity across metros as well as tier-2 and tier-3 cities. Airlines are expanding fleets, airports are scaling up infrastructure and passenger demand both domestic and international continues to grow. In FY 2024-25, total passenger traffic reached 220 million, surpassing pre-COVID levels by 25%. Despite this recovery, several airlines ceased operations between 2021 and 2024 due to financial stress caused by high aviation turbine fuel prices, depreciation of the Indian rupee against the US dollar, supply chain disruptions and intense competition. Industry profitability remained under pressure, with many carriers experiencing an average profit decline of around 14%. Amid these challenges, Avigo Airlines (Avigo), a business unit of Avigo Global Limited headquartered in New Delhi, stood out as one of the few consistently profitable carriers. The airline reported a net profit of ₹ 6,780 crore in FY2024-25, compared to ₹ 7,250 crore in FY2023-24. Although profits declined due to higher fuel costs, foreign exchange losses, increased airport charges and rising non-fuel operating expenses, the drop was considerably lower than the industry average. Avigo maintains a dominant 60% domestic market share.

The Board of Directors of Avigo Global Limited comprises 12 members and is led by its Chairman, Mr. Karanveer, along with the Managing Director, Mr. Anirudh. The Board includes five Independent Directors and five Non-Independent Directors (including one woman director) and is recognized for its strong corporate governance practices. Founded in 2010 as a low-cost carrier,

Avigo steadily expanded from serving a limited number of Indian cities to operating approximately 1,900 daily flights across 125 domestic and international destinations. Its fleet primarily consists of Airbus A320 family aircraft, enabling operational efficiency and cost optimization. Avigo's ultra-low-cost carrier model is built on aggressive cost control, high aircraft utilization, a point-to-point route network and lean staffing structures. Historically achieving on-time performance above 75-85%, the airline has strengthened its reputation for reliability and efficiency. Strategic initiatives such as sale-and-leaseback arrangements, operating a single aircraft type, maintaining a single-class configuration on domestic routes and securing manufacturer-backed maintenance agreements have further enhanced cost efficiency and productivity. While Avigo initially operated an all-economy configuration to minimize overhead and interior costs, it later introduced a dual-class setup on international routes to remain competitive. Avigo operates on a no-frills model while maintaining a strong focus on punctuality, safety, cleanliness, seamless transfers and efficient baggage handling. Consistent branding such as logos on headrest covers and in-flight magazines further strengthens Avigo's recognition and presence in the market. Avigo has successfully increased its revenue per available seat kilometer and consolidated its leadership position in India's rapidly growing aviation sector.

In the financial year 2025-26, Avigo reported a net profit of ₹ 1575 crore in Q1 and ₹ 862 crore in Q2. The sharp decrease in the second quarter was driven by the depreciation of Indian currency and the revaluation of dollar-denominated lease obligations. The operational crisis in Avigo erupted in November 2025 and escalated rapidly over the subsequent 20 days marking one of the most catastrophic days in Indian aviation history. During this disruption period, total 5,000 flights of Avigo Airlines were cancelled over a period of 20 days with peak

daily cancellation of 700 flights, more than 6,00,000 passengers affected and on time performance decreased to 20%. The primary catalyst emerged from revised Flight Duty Time Limitations (FDTL) framework, introduced by DGCA in January 2024 to align with international standards. Key changes included mandatory weekly rest increased from 30 to 48 consecutive hours, stricter limits on night flying and maximum daily duty hours reduced to prevent fatigue accumulation. These modifications effectively reduced available pilot flying hours by 25%, necessitating proportional staff increase that Avigo failed to implement. Passengers faced unprecedented disruptions, including airport waits exceeding 12 hours with little support. International travellers were stranded due to single-entry visa issues, unclaimed baggage piled up at major airports and alternative carriers tripled fares on key routes, further worsening the crisis. The crisis costs company ₹ 600 crore due to compensation paid to passengers, fines imposed by the Government in meeting deadlines. Company reported 60% decline in the December Quarter net profit at ₹ 345 crore. The primary causes of Avigo's operational failure stemmed from an over extended lean operating model that lacked adequate structural support. Key issues included ineffective workforce planning, out dated or insufficient rostering technology and cost-cutting culture that prioritized aggressive optimization over investment in infrastructure and operational resilience. Early warning signals from FDTL concerns were reportedly overlooked, compounding crew availability challenges. Additionally, the airline's dominant market position may have fostered complacency, further delaying critical investments in systems, staffing depth and contingency planning. The Board established a Crisis Management Group (CMG), chaired by Karanveer Singh and supported by three Independent Directors, to oversee the November 2025 operational breakdown caused by crew shortages, software issues and

network planning challenges. The CMG met daily to restore operational integrity. Avigo implemented immediate stabilisation measures and long-term reforms, including a temporary 7% flight reduction, improved crew rostering and coordination with the aviation regulator for flexible duty rules. To rebuild passenger confidence, the airline offered refunds and compensation and launched a recruitment drive to hire over 750 pilots and other administrative staff, to prevent future staff shortages.

During a Board Meeting held on 15th December 2025, the Board members reviewed the root causes of recent operational crisis in detail and discussed appropriate measures to prevent its recurrence. It was unanimously decided to commit 3% of annual revenue to IT infrastructure modernisation and to implement AI driven predictive rostering and disruptive management systems to strengthen operational reliance. Mr. Neeraj, an Independent Director holding a Master's degree in Business Administration from the Indian Institute of Management, Pune, recommended adopting the McKinsey 7S Model to ensure that the planned initiatives are implemented effectively and sustained over the long term. In view of the increased responsibilities of the directors compared to the previous year, the Board of Directors have decided, by way of altering the Articles of Association through a special resolution, to revise the sitting fees for Board meetings from ₹ 50,000 per meeting to ₹ 60,000 per meeting for all directors other than independent directors and women director and to ₹ 75,000 per meeting for all independent directors and women director.

In March 2026, anticipating a decline in market interest rates, the Chief Financial Officer (CFO) is considering the call of ₹ 500 crore of 10-year bonds with a face value of ₹ 1,000 each, issued five years ago with a callable feature at a coupon rate of 13%. The bonds were issued at a premium of ₹ 50 per bond, generating

total proceeds of ₹ 525 crore and incurred an initial flotation cost of ₹ 1.20 crore. They are currently callable at ₹ 1,100 per bond. To refinance the existing debt, the company plans to issue ₹ 500 crore of new 11%, 10 year bonds at par value (₹ 1,000 per bond), with an estimated flotation cost of ₹ 1.50 crore. The after-tax cost of debt is 8% and flotation cost is written off for tax purpose in five years. The CFO has instructed CA Ankit, Finance Manager, to assess the viability and financial implications of retiring the bonds by the end of March 2026. The company tax rate is 25%.

Avigo Global Limited had entered into a lease arrangement on 1st April 2021 for office space measuring 6,000 sq. ft. for a period of 10 years. As per the terms of the agreement, lease payments of ₹ 6,00,000 per annum were payable in advance at the beginning of each year. The agreement also provided an option to extend the lease for an additional period of 5 years at an annual rent of ₹ 8,00,000. It is the company's policy to depreciate RoU asset on straight line basis. However, the Company had not shown any intention to exercise the extension option at the time of lease agreement. The Company had incurred initial direct costs amounting to ₹ 3,00,000 in connection with the lease. The incremental borrowing rate at the commencement date, i.e., 1st April 2021 was 11% per annum. In March 2026, due to space constraints arising from the recruitment of additional staff in the next year, the Company decided to take on lease an additional 3,000 sq. ft. in the same building. It is decided to enter into a separate lease agreement for additional space for a period of 9 years and the additional space will be available for use from March 2027. The incremental borrowing rate as of 31st March 2026 is 12% per annum. The company also decided to exercise the extension option relating to the original 6,000 sq. ft. lease at the end of the year 2025-26.

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A team of four officers from Income-tax Department descended upon the company's Head Office at New Delhi on 15th February 2026 to conduct TDS survey under Income-tax Act, 1961. After completing the necessary formalities, they asked for the TDS returns filed during the financial year 2024-25 and three quarters of 2025-26. After perusing the company's accounts, bills and TDS returns, the team summarised following points in the matter of TDS deduction and incidental issues:

- (i) Company has made payment of lease rent of ₹ 24 crore to PQR Fleet Services IFSC Limited located in Gujarat International Finance Tec-City for lease of an aircraft which commenced in June 2025. Neither tax has been deducted on lease rent paid during the year nor these payments have been reported in TDS returns filed by the company.
- (ii) Company has paid landing and parking charges of ₹ 12 crore to Airport Authority of India and ₹ 8 crore to private airport operators. The company has deducted tax @ 2% instead of 10% as the payments are in the nature of rent paid for use of space.
- (iii) Company has taken an engine on lease in financial year 2025-26 under an arrangement with a foreign company, a tax resident of Germany. Company deducted tax at source @ 10% on lease rental paid as per the provisions contained under DTAA between India and Germany. Chief Accountant informed that foreign company has no permanent establishment in India. However, revenue officers contended that in the absence of furnishing of PAN, TDS is to be deducted at a higher rate of 20% as per the relevant provisions of Income-tax Act, 1961.

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- (iv) The Company allowed exemptions and deductions to its employees during financial year 2024-25 relevant to Assessment Year 2025-26 on account of House Rent Allowance (HRA), Leave Travel Concession (LTC) and deductions under Chapter VI-A of the Income-tax Act, 1961. In cases, where the monthly rent exceeded ₹ 10,000, the Company accepted cash rent receipts containing only the address of the property as supporting evidence. Further, exemption in respect of Leave Travel Concession was allowed on self-declaration submitted by employees who had exercised the option to opt out of the new tax regime under Section 115BAC. During verification conducted in financial year 2025-26, it was observed that in 10 cases the rent receipts furnished by employees were not found to be genuine. It was further noticed that in 20 cases, employees ultimately filed their returns of income under the new tax regime and discharged the tax liability accordingly at the time of filing their returns. Before leaving, the income-tax officer issued show cause notice in respect of above issues.

In the financial year 2025-26, Avigo enhanced the passenger experience by offering complimentary high-speed WiFi for economy class travellers and meals on board, with the value of these meals included in the fare. The company partnered with Royal Caterers Pvt. Ltd., an outdoor catering service, to provide these meals. In February 2026, Avigo collected a total of ₹ 2,000 crore (excluding GST) from both domestic and international flights. Of this, ₹ 1,600 crore was generated from economy class passengers, which includes ₹ 60 crore as Passenger Service Fee (PSF) and ₹ 50 crore as User Development Fee (UDF). Additionally, ₹ 400 crore was collected from business class passengers, which includes ₹ 12 crore as PSF and ₹ 8 crore as UDF. Royal Caterers Pvt. Ltd. submitted a tax invoice for ₹ 5.90 crore (including IGST 18%). Total ITC available in GSTR 2B for the month of February 2026 is ₹ 26.50 crore. The applicable GST rates are 5% on economy class fares, 18% on business class fares and 18% on PSF and UDF payable by airline operator.

Multiple Choice Questions**5×2****[Provide the correct or most appropriate option to the following questions]****=10**

5.1. Match the following attributes of the Kano Model to the corresponding services offered by Avigo to its customers :

	Attribute		Services
a.	Basic	1.	Free High-Speed Wi-Fi
b.	Performance	2.	Efficient Baggage handling
c.	Delighter	3.	Logos on headrest covers and in-flight magazines
d.	Indifferent	4.	Seamless Transfers

Options :

- (A) a- 3, b-1, c-2, d-4
 (B) a-2, b-4, c-1, d-3
 (C) a-1, b-3, c-4, d-2
 (D) a-4, b-2, c-3, d-1

5.2. What is the financial impact i.e. NPV of retiring the bonds ? (PVIFA 8%, 10 = 6.71 and PVIFA 8%, 5 = 3.99)

- (A) NPV of redeeming bonds is ₹ 10.82 crore
 (B) NPV of redeeming bonds is ₹ 25.84 crore
 (C) NPV of redeeming bonds is ₹ 36.63 crore
 (D) NPV of redeeming bonds is ₹ 24.13 crore

5.3. Which of the following statement(s) is/are incorrect in regard to deduction of tax at source from salary in view of the information given in the case study as per the relevant provisions of Income-tax Act, 1961 ?

- (i) Company cannot be treated as assessee in default because it has correctly deducted TDS on the basis of evidences submitted by the employees and employees have already filed income tax returns.
- (ii) Company will be subject to interest and it is payable even where the company is not deemed to be an assessee in default.
- (iii) Company will be subject to penalty under Section 221 and not Section 271C, once short deduction under Section 192 is established.
- (iv) Receipt of intimation from employees automatically relieves the employer from verifying the admissibility or correctness of HRA, LTC, or other deductions.

Options :

- (A) (ii) only
- (B) (ii) and (iv)
- (C) (i) (iii), (iv)
- (D) (i), (ii) (iii), (iv)

5.4. Which of the following statements is fully correct as per the relevant provisions of CGST Act, 2017 ?

- (A) Meals supplied on board constitute a mixed supply and ITC in respect of outdoor catering is available as the same is used to making outward taxable supply as an element of taxable supply. The total GST (net of ITC) payable by Avigo is ₹ 125.5 crore, PSF and UDF form part of airfare value taxable at 18% for economy and business class.

- (B) Meals supplied on board constitute a composite supply with air transportation as principal supply but ITC on outdoor catering services is blocked. The total GST (net of ITC) payable by Avigo is ₹ 117.30 crore and PSF and UDF form part of airfare value taxable at 18% for economy and business class and it will take ITC of GST on PSF & UDF paid to airport operators.
- (C) Meals supplied on board constitute a composite supply with air transportation as principal supply and ITC in respect of outdoor catering is available as the same is used to making outward taxable supply as an element of a taxable composite supply. The total GST (net of ITC) payable by Avigo is ₹ 116.40 crore, PSF & UDF are statutory levies collected as agent of airport operator and excluded from taxable value of airfare.
- (D) Meals supplied on board constitute a composite supply with air transportation as principal supply and ITC in respect of outdoor catering is available as the same is used to making outward taxable supply as an element of a taxable composite supply. The total GST (net of ITC) payable by Avigo is ₹ 116.40 crore and it will take ITC of GST on PSF & UDF paid to airport operators.

5.5. Which of the following statement is correct as regards the proposed enhancement of sitting fees as per the provisions of the Companies Act, 2013 ?

- (A) The proposal to increase the sitting fee to ₹ 75,000 for Independent Directors and Women Director cannot be accepted, as all directors are required to receive equal sitting fees per meeting.

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- (B) The proposal to increase the sitting fee to ₹ 75,000 only for women director can be accepted, as all other directors must receive equal sitting fees per meeting.
- (C) The proposal to increase the sitting fee to ₹ 60,000 per meeting for all directors other than Independent Directors and Women Directors and to ₹ 75,000 per meeting for Independent Directors and Women Director, can be accepted, as the sitting fee is within the maximum permissible limit.
- (D) The proposal to increase the sitting fee to ₹ 60,000 per meeting for all directors other than Independent Directors and Women Directors and to ₹ 75,000 per meeting for Independent Directors and Women Director, can be accepted provided it is approved by the shareholders in a general meeting.

Descriptive Questions :

- 5.6. How can Avigo Global Limited align and integrate all seven elements of the McKinsey's 7S framework to strengthen operational robustness, enhance competitive advantage and prevent a recurrence of operational crisis, while ensuring that each element reinforces the others to create a resilient, efficient and customer-focused airline ? 6
- 5.7. The company has decided to exercise the extension option under its original lease agreement. Explain the accounting treatment for this transaction in the books of Avigo Global Limited and prepare the necessary journal entry as of 31st March 2026. Use present value (PV) factors up to four decimal places for all calculations as given below. 5

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5.8. The survey team has raised the matter regarding non-deduction of tax at source on lease rent paid to PQR Fleet Services IFSC Limited and lease rent of engine paid to foreign company and short deduction of landing and parking charges, in its show-cause notice. How can CA Ankit defend the company while preparing reply to show cause notice as far as these issues are concerned ? 4

Year	0	1	2	3	4	5	6	7	8	9	10
PV@ 11%	1	0.9009	0.8116	0.7312	0.6587	0.5935	0.5346	0.4817	0.4339	0.3909	0.3522
PV @ 12%	1	0.8928	0.7972	0.7118	0.6355	0.5674	0.5066	0.4524	0.4039	0.3606	0.3220

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is not to be understood as a statement of opinion or as a recommendation of any kind. It is merely a statement of fact. The Commission has no authority to issue orders or to enforce its recommendations. It is the duty of the Commission to report to the President and the Congress on the progress of the work of the Commission and on the results of its investigations. It is also the duty of the Commission to make such recommendations as it may deem appropriate.

1	2	3	4	5	6	7	8	9	10	11	12
1947	1948	1949	1950	1951	1952	1953	1954	1955	1956	1957	1958
1947	1948	1949	1950	1951	1952	1953	1954	1955	1956	1957	1958