

Feedback Ventures

In context of proportionate/adhoc disallowance taking support from earlier verdict of DHC in Chemical design case, it is concluded that:

“Findings of fact are recorded by the two authorities below concurrently in favour of the assessee concluding that under Section 14A direct or indirect expenses relating to earning of exempt income is disallowable but disallowance cannot be on proportionate basis in proportion to divided income in certain expenses have been adjudicated. In another appeal raising identical issue was dismissed by this Court..”