

- (ii) ऐसे माल की औसत मासिक अंतिम सूची ऐसे व्यापारिक क्रियाकलापों से संबंधित विक्रयों का दस प्रतिशत या उससे कम है।

[अधिसूचना. सं. 64 /2019/फा.सं. 500/1/2014-एपीए-II]

नेहा नौटियाल, अवर सचिव

### स्पष्टीकारक ज्ञापन

यह अधिसूचना निर्धारण वर्ष 2019-20 के लिए थोक व्यापार के लिए एक प्रतिशत और अन्य सभी मामलों में तीन प्रतिशत की सह्य रेंज का उपबंध करती है। यह प्रमाणित किया जाता है कि इस अधिसूचना को भूतलक्षी प्रभाव दिए जाने से किसी पर भी कोई प्रतिकूल प्रभाव नहीं पड़ेगा।

## MINISTRY OF FINANCE

(Department of Revenue)

### NOTIFICATION

New Delhi, the 13th September, 2019

(Income-tax)

**S.O. 3272(E).**—In exercise of the powers conferred by the third proviso to sub-section (2) of section 92C of the Income-tax Act, 1961 (43 of 1961)(hereinafter referred to as the 'said Act'), read with proviso to sub-rule (7) of rule 10CA of the Income-tax Rules, 1962, the Central Government hereby notifies that where the variation between the arm's length price determined under section 92C of the said Act and the price at which the international transaction or specified domestic transaction has actually been undertaken does not exceed one per cent. of the latter in respect of wholesale trading and three per cent. of the latter in all other cases, the price at which the international transaction or specified domestic transaction has actually been undertaken shall be deemed to be the arm's length price for assessment year 2019-2020.

**Explanation.-** For the purposes of this notification, "wholesale trading" means an international transaction or specified domestic transaction of trading in goods, which fulfils the following conditions, namely:-

- (i) purchase cost of finished goods is eighty per cent. or more of the total cost pertaining to such trading activities; and  
(ii) average monthly closing inventory of such goods is ten per cent. or less of sales pertaining to such trading activities.

[Notification No. 64/2019/F. No. 500/1/2014-APA-II]

NEHA NAUTIYAL, Under Secy.

### Explanatory Memorandum

The notification provides for tolerance range of one per cent. for wholesale trading and three per cent. in all other cases for assessment year 2019-20. It is certified that none will be adversely affected by the retrospective effect being given to the notification.