

MINISTRY OF FINANCE**(Department of Revenue)**

(CENTRAL BOARD OF DIRECT TAXES)

NOTIFICATION

New Delhi, the 27th June, 2019

INCOME TAX

S.O.2164(E).—In exercise of the powers conferred by clause (6C) of section 10 of the Income-tax Act, 1961 (43 of 1961), the Central Government hereby specifies that any income arising to the foreign company namely, M/s. Rolls-Royce Defense Services, Inc., 450 South Meridian Street, Indianapolis, Indiana 46225-1103, United State of America, by way of royalty or fees for technical services received in pursuance of the Mission Ready Management Solutions Agreement (MRMS) No. CABS/18FET005/17-18, dated the 14 July 2017, entered into between M/s. Rolls-Royce Defense Services, Inc. and Centre for Air borne Systems, Defence Research and Development Organisation, Ministry of Defence, to the extent of USD 21,67,317.50, shall not be included in computing the total income of the said foreign company.

[Notification No. 50 /2019/F.No.200/1/2019-ITA.I]

RAJARAJESWARI R., Under Secy.