

TAXMAN

THE TAX LAW WEEKLY

ISSN 0972-8198

www.taxmann.com

HIGHLIGHTS

29 SEP 2026

- ▶ Where non-resident operated cruises originating and terminating at same port in India and earned income from cruise packages, mere provision of hospitality and entertainment services on board did not exclude cruises from scope of 'carriage' under section 44B, thus, income was taxable on a presumptive basis under section 44B at 7.5% of the gross cruise fare receipts (SC) **153**
- ▶ Where assessee-trust running a school failed to timely file Form 10 for accumulation of unspent income under section 11(2) due to oversight and first-time e-filing, but invested surplus in prescribed modes and explained delay to CIT (Exemptions), condonation of delay was required to enable exemption under section 11 in line with CBDT Circular No. 7/2018 (Gujarat) **220**
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FOR THE WEEK OF SEPTEMBER 19 - SEPTEMBER 25, 2026 RELEASED ON SEPTEMBER 19

MODE OF CITATION [2026] 312 TAXMAN...(..)

VOLUME 312 | ISSUE 3 Price : ₹ 450 TOTAL NO. OF PAGES 120

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Taxman weekly comes in Six volumes.

Annual Subscription : ₹ 17,500 for Six volumes for the year 2026. Single copy is ₹ 450 only.

Back years' volume ₹ 3000 per volume for paper back and add ₹ 300 per volume for Hard case binding.

Taxman weekly is published on every Saturday. **NON-RECEIPT OF PART MUST BE NOTIFIED WITHIN 60 DAYS OF THE DUE DATE.**

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Address your editorial and subscription correspondence to **Taxmann Allied Services (P.) Ltd., 59/32, New Rohtak Road, New Delhi-110005**

Printed and Published by **Ansh Bhargava** on behalf of **Taxmann Allied Services (P.) Ltd.** and Printed at **Tan Prints (India) Pvt. Ltd., 44 Km. Mile Stone, National Highway, Rohtak Road, Village Rohad, Distt. Jhajjar (Haryana)** and Published at **59/32, New Rohtak Road, New Delhi-110 005**

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Website: www.taxmann.com

ISSN : 0972-8198

MODE OF CITATION

[2026] 312 Taxman...(…)

TOTAL PAGES [120]

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