



Broadcasting rights and Advertisement revenue taxable

Global Cricket Corporation Pte Ltd [TS-981-ITAT-2022(Mum)]

Mumbai, December 14, 2022

- In a recent decision by the ITAT, broadcasting rights (pertaining to non-live exhibitions and recorded feed) in relation to International Cricket Council (ICC) events, have been declared taxable as per articles 12(2) and 12(3) of the India Singapore DTAA. Further simplifying the taxability of the revenue generated from the advertisement services, the tribunal is of the opinion that the remuneration is received by the assessee for the advertisement services which in turn increased the visibility of the brand. It also considered the applicability of article 24 of the DTAA between India and Singapore, regarding the 'Limitation of Relief' clause, and upheld that the assessee is capable of taking benefit of the said clause as it offered its global income for tax at Singapore and denying the limitation relief, would only amount to defeating the purpose of Double Taxation Avoidance Agreements whose purpose is to provide relief to people who generate income from more than one jurisdiction.



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