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INCOME-TAX ACT, 2025

Chapter X: SPECIAL PROVISIONS RELATING TO AVOIDANCE OF TAX

Section 167 - Power of Board to make safe harbour rules.

(1) The determination of—

(a) income referred to in section 9(2); or

(b) arm’s length price under section 165 or 166,

shall be subject to safe harbour rules.

(2) For the purposes of sub-section (1), the Board may make rules for safe harbour.

(3) For the purposes of this section, “safe harbour” means circumstances in which the income-tax authorities shall accept,––

(a) the transfer price; or

(b) the income, deemed to accrue or arise under section 9(2),

declared by the assessee.

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