



GOVERNMENT OF INDIA
MINISTRY OF FINANCE
INCOME TAX DEPARTMENT
OFFICE OF THE ASSISTANT
COMMISSIONER OF INCOME TAX
INT TAX CIRCLE 2(1)(1), MUMBAI

To, CU LINES PTE LTD 13-06 SOUTHPOINT,200 CANTONMENT ROAD SINGAPORE 999999,FOREIGN Singapore	
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PAN: AAKCC8622M	Assessment Year: 2025-26	Dated: 30/04/2024	DIN & Letter No : ITBA/COM/F/17/2024-25/1064466217(1)
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Sir/ Madam/ M/s,

Subject: Proceedings for grant of DIT Relief Certificate to Shipping lines - Certificate

CU Lines Pte Ltd (PAN-AAKCC8622M) has applied for 100% DIT relief for **2 vessels & 8 pooling partners** through its agent in India, M/s Seahorse Ship Agencies Pvt Ltd (PAN-AABCS2057F) for F.Y. 2024-25 vide letter dated 28.03.2024. It has been contended by the applicant on behalf of the principal that the principal is a tax resident of Singapore and is entitled to the benefits of Article 8 of the DTAA between India and Singapore. The applicant has filed the copy of Ship Registry certificates and Time Charter agreements.

2. The applications as well as the documents, filed in this regard have been perused. On prima facie examination of the documents and details, it appears that principal is entitled for the benefit of Article 8 of the DTAA between India and Singapore. In view of this, the principal is entitled for 100% DIT Relief on account of income from operation of the following **2 vessels** operating in the international traffic, i.e. freight and other ancillary charges in connection with such transportation, which are either owned or chartered by principal for transportation of passengers, mail, livestock or goods carried on by the principal within Indian ports. However, any income earned for the transportation of passengers, mail, livestock or goods from one place to another place within India is not covered by this DIT Relief Certificate/Annual NOC. The details of Vessels are given below:-

Sr No	Name of the Vessel
1	MV S M Tianjin
2	MV Zhong Gu Chang Sha

Note: If digitally signed, the date of digital signature may be taken as date of document.
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3. Further, on prima facie verification of pooling contracts, shipping income earned by Principal on Pool Arrangement with following companies/Lines will also be qualify for 100% DIT relief on account of income from operation of the vessels as per the vessel sharing agreements, in respect of which DIT relief is granted and which are operating in the international traffic only.

Sr No	Name of the Pooling Shipping Line
1	Emirates Shipping Lines DMCEST
2	Global Feeder Shipping LLC
3	Korea Marine Transport Co Ltd
4	RCL Feeder Pte Ltd
5	Pacific International Lines Private Limited
6	Evergreen Marine Corp (Taiwan) Ltd
7	Inter Asia Lines Singapore Pte Ltd
8	Unifeeder FZCO

4. In view of above facts, the certificate is being issued. This DIT certificate/ Annual NOC is valid for F.Y. 2024-25 for the vessels mentioned above on para 2. This certificate is provisional in nature and subject to final assessment. This DIT Certificate/Annual NOC is being issued on an undertaking given by the principal that the above referred vessels will be operated in 'International Traffic' only during the currency of the this DIT Certificate/Annual NOC. Income earned from feeder vessels, which connect to mother vessels, which are not owned, leased or chartered by CU Lines Pte Ltd (PAN-AAKCC8622M) is not covered by this certificate.

5. Further, the certificate is issued and will be relevant only to CU Lines Pte Ltd (PAN-AAKCC8622M) and not applicable to any other shipping lines. The DIT Certificate/Annual NOC is valid for F.Y. 2024-25 unless it is cancelled or modified before the expiry of the said financial year. The fact of the cancellation or modification will be intimated to you.

SHRIKANT PANDEY
INT TAX CIRCLE 2(1)(1), MUMBAI

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refer Digital Signature at the bottom of the page)



This document is digitally signed

Signer: SHRIKANT NARAYAN PANDEY
Date: Tuesday, 26 February 2024 3:45 PM
Location: DIRECTORATE, India