	रेस कोर्स	ONER (APPEALS), जी एस टी झवन / 2 ¹⁴ रिंग रोड, / Race Cou राजकोट / Rajkot – 3(GST & CENTRA Floor, GST Bhavan, irse Ring Road, 50 001	L EXCISE,	
रजि	स्टर्ड डाक ए. डी. द्वारा :-	~			
क	स्टर्ड डाक ए. डी. द्वारा :- अत्तेल लाइल लंडमा Appeal (Tile No. V2/284 /RAJ/2016 664 32 4	\\$} 147/	ल आदेश से / 010 No ST/REF/2016	11.11.2016	
ख	अपील आदेश संख्या (Order-In-App	eal No.):			
		US-000-APP-1	47-2017-18	8	
	आदेश का दिनांक/ 26.12.201 Date of Order:		ही तारीख	27.12.2017	
	कुमार संतोष , आयुक्त (अपील्स), Passed by Sh ri Kumar Sant			Rajkot	
ग	अपर आयुक्त/ संयुक्त आनुकत! जयामुक्त! वहायक आयुक्त, केन्द्रीय उत्पाद कुल्का संवाकर, राजकोट / आस्रवसर / माधीपाम। द्वारा उपरसिखित जारी मूल आदेश से सुधित: / Arising out of above mentioned OIO issued by Additional/Joint/Deputy/Assistant Commissioner. Central Excise / Service Tax,				
घ	Rajkot / Jamnagar / Gandhidham : अपीलकर्ता & प्रतिवादी का नाम एवं				
3	M/s. Kunal Structure (India Sanskruti Apartment,Panchvati Ro) Pvt. Ltd., Kunal			
	इस आदेष(अपील) से व्यक्ति कोई व्यक्ति सिम्जलिडि Any person aggrieved by this Order-in-Appea	न तरीके में उपयुक्त प्राप्तिकारी may file an appeal to the	। আয়িজনের কি মানাজ পর্ব Appropriate authority	ter देग्यर अन्य संबद्धा है।/ in the following way.	
(A)	सोमा गुल्क केन्द्रीय उत्पद शुल्क एवं सेवाकर अपीलीय त्यायाधिकरण के प्रति अपील, केन्द्रीय उत्पद शुल्क अधिनियम ,1944 की प्राप्त 358 के अंतर्गत एवं: खिल अधिनियम, 1994 की प्राप्त 86 के अंतर्गत जिस्तालिखिन्त जगह की जा सकती हे //				
	Appeal to Customs, Excise & Service Tax - Finance Act. 1994 an appeal lies to:-	Appellate Tribunal under 5	ection 35B of CEA.	1944 / Under Section 85 of the	
0	জনীৰমতা মুখ্যাছৰ से सञ्चलिधन तभी मामले शीमा गुल्क, बेन्हींय उत्पादन गुल्क एवं मेणका अपीलीय न्याधाधिकाण की विशेष पीठ. वेस्ट क्लॉक स 2, भार. के पुरम, नई दिप्परी, को की आमी प्राहिए ॥ The special bench of Customs, Excise & Service Tax Appellate Tribunal of West Block No. 2, R.K. Putam, New Dethi in all matters relating to classification and valuation.				
ii)	उपरोक्त परिच्छेद 1(a) में बताए रूए अपीलों के अलवा तीम सभी अपीले तीमा गुल्क, केटीय उत्पाद गुल्क एवं लेवाकर अपीलीय ल्यायाधिकाण (मिश्टेट) की पत्रियम बोबीय पीठिका, द्वितीय तल बहुमाली मवल अववर्ष अंडमदाबाद- उट∞ाद को की उत्तरी पाहिए // To the West regional bench of Customs, Excise & Service Tax Appellate Tribunal (CESTAT) at, 2 [™] Floor, Bhaumali Bhawan, Asarwa Ahmedabad-380016 in case of appeals other than as mentioned in para 1(a) above				
849	अभीलीय ज्यायाधिकरण के लसक अभील परन्तन करने गये बपड EA.3 को चार प्रतियों में इने किया जाना और लगाया गया जुर्माला स्वाप 5 लाख वा उससे करा स्वायाधिकरण की शाखा में रक्षयक 10.000/. इथवे का वि ल्यायाधिकरण की शाखा में रक्षयक 10.7271 के नाम संबंधित ड्राफ्ट का जुनताल, केंक की उस शाखा में होशा लिए आवेटल-पड के शाथ 500/- स्वाप का लिप्रसित कु	मे लिए केन्द्रीय उत्पाद शास्क (3 धारिए)। इनमें से कम में कम 5 लाख रुपए सा 50 लाख रु धारित जमा शुल्क की द्वीरि से किसी मी सार्वजिसक क्षेत्र के चारिए जस लक्षप्रिक अप्रियंत्र के	स्पील) लियज्यवली, 2001. एम प्रति के लाग, जहां एर तक अपना 50 लाख । संसरज करें। लिग्रीरित केंद्र तबार आर्ग स्वर्णकेल	प्रत्याः गुल्क की सॉन अवाज की सॉन त्यार में अधिक है तो कसत्ता 1,000/- शुल्क का मुन्तराज, संबंधित अपीलिय के जाय देवना के संविधित अपीलिय	
	The appeal to the Appellate Tribunal shall b Excise (Appeal) Rules, 2001 and shall be ac 1.000/- Rs.5000/- Ris 10.000/- where amount above 50 Lac respectively in the form of cro sector bank of the place where the bench of is situated. Application made for grant of stay	companied against one wit of duty demand/interest/g sped bank draft in favour any nominated public sern	ich itt least should b enalty/refund is upto of Asst. Registrar of the basis of the class	e accompanied by a fee of Rs. 5 Lac. 5 Lac to 50 Lac and	
3)	अपीलीय न्यायाधिकरण म लगास अपील, जिल्ल अपित निर्धारित प्रचव ST-5 में यहा प्रतियों में की तह लंक (उनमें में एक पनि प्रमापित होनी वाहिए) और इनमें जुर्माना, रुपए 5 लाख म उनमें कम, 5 लाख रुपए 1 रुपये अथवा 10,000/- रुपये का निर्धारित जम्म सुन्क महायक रजिस्टार के लाम से किसी में स्वतिजन क्षेत्र वैंक की उम शाखा में होला पाहिए जहां संवधित अपील 500/- रुपए का निर्धारित शुल्व अभा करना होगा।/	रेपम, 1994 की पाल 86(1) के ती एवं उसके साथ जिस आदेश से कम से कम एक प्रति के 150 साथ रुपए तक अधात 5 के पति संतरम करें। निप्तीरन 1 के बिस तराह जरीर प्रेजीवन के	म् अंगर्गत वंडाका निवास के विरुद्ध अपील की गयी लग्भ जहां सेवाका की स 0 नाख व्यप्ट से अधिक एनक को अनुगतान, स्वीधिक	ही. उसकी प्रति साथ में संतरम को जि व्याज की मॉरा और लगाया गया है तो कम्प्रश: 1,000/- रुपये, 5,000/- अपीलीय स्थायायिकरण की धारक्ष के	
	The appeal under sub section (1) of Section quadruplicate in Form S.T.5 as prescribed uni- copy of the order appealed against (one of to 1000/- where the amount of service tax & inte amount of service tax & interest demanded Rs.10.000/- where the amount of service tax form of crossed bank draft in favour of the 2 where the bench of Tribunal is situated. / App	which shall be certified cos which shall be certified cos west demanded & penalty & penalty levied is more & interest demanded & p solution.	e Tax Rules, 1994, a by) and should be a levied of Rs. 5 Lakhs than five takhs but maily levied is more	nd Shall be accompaniew by a ccompanied by a fees of Rs. or less, Rs.5000/- where the not exceeding Rs. Fifty Lakts, than fifty Lakts rupees, in the	

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वितन अधिवियम, 1994 की धारा 86 की उप-धाराओं (2) एवं (2A) के अंतर्गत दंजे की गयी अपील, संवाकर नियमवाली, 1994, के सियम 9(2) एवं 9(2A) के लहन जिस्तीरेल प्रपत S.T.-7 में की जा सकेजी एवं उसके साथ आयुक्त, केन्द्रीय उत्पाद शुरूक अथवा आयुक्त (अपील), केन्द्रीय उत्पाद शुरु द्वारा यहित आदेश की प्रतियों सलगत करें (उनजों से एक प्रति प्रजाणित होनी पाहिए) और आयुक्त दवारा सहायक आयुक्त अपदा उपायुक्त, कैन्द्रीय उत्पाद शुल्कर होयाकर, करे अपीलीय स्यायाधिकरण को आवेदन दलें करने का निर्देश देने वाले आदेश की पति भी साथ में सलगत करनी होणी । / The appeal under sub section (2) and (2A) of the section 86 the Finance Act 1994, shall be filed in For ST 7 as prescribed

under Rule 9 (2) & 9(2A) of the Service Tax Rules, 1994 and shall be accompanied by a copy of order of Commissioner Central Excise or Commissioner, Central Excise (Appeals) (one of which shall be a contified copy) and copy of the order passed by the Commissioner authorizing the Assistant Commissioner or Deputy Commissioner of Central Excise/ Service Tax to file the appeal before the Appellate Tribunal

- सीमा शुल्क, केन्द्रीय उत्पाद शुल्क एव सेवाकर अपीलीय पाधिकरण (सेस्टेट) के पति अपीली के सामले में केन्द्रीन प्रापद शुल्क अधिनियम 1944 की पास 35एफ के अंतर्गत, जो की वित्तीय अपितियम, 1994 की धारा 83 के अंतलेत सेवाकर को भी लागू की नई है. इस आदेश के पति अपीलीय पाधिकपण में अपील करते समय उत्पाद शुल्करमेवा कर मान के 10 प्रतिशत (10%), जब मांग एवं जुमीला विवादित है. या जुमीमा, जब केवल जुमीना (ii) वितदित है, का भूगतान किया जाए, बात्तें कि इस पता के अंतर्गत जमा कि जाने तावी अपेक्षित देम रोशि दस करेड़ रुपए से अधिक न हो।
 - केन्द्रीय उत्पाद शुरुव एवं मेतावत के अत्योत 'मांग किए गए धुल्क' में लिम्न शामिल है थाए 11 डी के अंतर्गत रक्य
 - संग्रहेह अभा की तो गई मलत राशि 00 शेशहेट जमा जियमासली के जियम 5 के अंतर्गत देव रकम

(iii)बच्चारी यह कि इस प्राप्त के वावचान विल्लीय (स. 2) अधिनियम 2014 के आरंभ में पूर्व किसी अपीलीय वाधिकारी के लमक विवासपील स्थमत अजी १व अधील को सागू नहीं होगे।/

For an appeal to be filed before the CESTAT, under Section 35F of the Central Excise Act, 1944 which is also made applicable to Service Tax under Section 83 of the Finance Act, 1994, an appeal against this order shall lie before the Tribunal on payment of 10% of the duty demanded where duty or duty and penalty are in dispute, or penalty, where penalty alone is in dispute, provided the amount of pre-deposit payable would be subject to a ceiling of Rs. 10 Crores.

- Under Central Excise and Service Tax, "Duty Demended" shall include
- amount determined under Section 11 D. 10
- amount of erroneous Cenval Credit taken, (40
- amount payable under Rule 6 of the Convat Credit Rules (14)

provided further that the provisions of this Section shall not apply to the stay application and appeals pending before any appellate authority prior to the commencement of the Finance (No.2) Act. 2014.

सारत सरकार को पुलरीक्षण आवेदल :

(C)

Revision application to Government of India: इस आदेश की पुनरीकाण यापिका जिस्तनिर्शिक्षेत्र सामलों में. केटीब उत्पाद शुल्क अधिनियम, 1994 की घारा 35EE के प्रथम परंतुक के अंतर्रत जवर सचित्र, भारत सरकार, पुनरीक्षण आवेदन इंकाइं, वित्तर अंशास्य, राजस्थ विभाग, योथी सजिल, जीवन दीप मधन, संसद माने, सई विल्ली-110001, को किया जाता चाहिए।

A revision application lies to the Under Secretary, to the Government of India, Revision Application Unit, Ministry of Finance, Department of Revenue, 4th Floor, Jeevan Deep Building, Parliamont Street, New Dethi-110001, under Section 35EE of the CEA 1944 in respect of the following case, governed by first proviso to sub-section (1) of Section 35B ibid

यदि साम के बिसी जुकसान के सामने में, जहां जुकलान किसी साल को किसी कारखाने से संडार मुझ के पारगसन के दौरान या किसी अन्य कारखाने या फिर फिली एक संडार गुह में दूसरे संडार गुह पारगसन के दौरान, या किसी संडार गुह में या संडारण में साल के प्रसंस्करण के दौरान, किसी कारखाने या किसी संडार गुह में सार्थ के जुकसान के सामले में। In case of any loss of goods, where the loss occurs in transit from a factory to a warehouse or to another factory or from one warehouse to another during the course of processing of the goods in a warehouse or in storage whether in a factory or in a 111

warehouse

- भारत के बाहर किसी राष्ट्र या क्षेत्र को लियोल कर रहे साल के विजियोग से प्रमुक्त कच्चे साल पर मरी नई केल्द्रीय उत्पाद शुल्क के छुट (रिबेट) के सामले से, जो भारत के बाहर किसी राष्ट्र या क्षेत्र की जियोल की लयी है। / (3)
 - In case of rebate of duty of excise on goods exported to any country or territory outside India of an excisable material used in the manufacture of the goods which are exported to any country or territory outside India
- वदि उत्पाद शत्रक का मुगलान किए बिला आगत के बाहर, नेपाल या मुटान को माल जियोत किया गया है। / (iii)
- In case of goods exponed outside India export to Nepal or Bhutan, without payment of duty.
- सनिधियत उत्पाद के उत्पादन शुल्क के भुगतान के लिए जो इंयुटी केडीट इस अधिनियम एव इसके विमिल्ल वावधानों के लहत मान्य की नई है और ऐसे ज़िदेश जो आयुक्त (अपील) के द्वारा विल्न अधिनियम (न. 2), 1998 की धारा 109 के द्वारा नियत की गई तारीफ अथवा समायाबिधि पर वा बाद में पारित किए गए है।/ (iv) Credit of any duty allowed to be utilized towards payment of excise duty on final products under the provisions of this Act or the Rules made there under such order is passed by the Commissioner (Appeals) on or after, the date appointed under Sec. 109 of the Finance (No.2) Act. 1998.
- उपरोक्त आवेदल की दी प्रतिया प्रयत्न संग्रमा EA-8 में, जो की केन्द्रीय उत्पादन शुल्क (अपील) नियमावली, 2001, के लियम 9 के अलगेत विनिर्दिष्ट है. इस आदेश के संपेक्षण के 3 सात्र के अंतर्गत की जानी धाहिए । उपरोक्त अवेदन के साथ सूल आदेश व अपील आदेश की दी प्रतिया सतरन की जानी धाहिए। साथ ही केन्द्रीय उत्पाद शुल्क अधिनियम, 1944 की प्राप्त 35-EE के लहत निर्धारित शुल्क की अदमांगी के साध्य के तौर पर TR-6 की प्रति (v) संबद्धा की जाती चाहिए। / The above application shall be made in duplicate in Form No. EA-8 as specified under Rule, 9 of Central Excise (Appeals) Rules, 2001 within 3 months from the date on which the order sought to be appealed against is communicated and shall be accompanied by two copies each of the OIO and Order-in-Appeal. It should also be accompanied by a copy of TR-6 Challan evidencing payment of prescribed fee as prescribed under Section 35-EE of CEA, 1944, under Major Head of Account.
- पुनरीक्षण आवेदन के साथ जिन्नतिवित निर्धापित शुल्क की जदायनी की जनी चाहिए । जेवी शंखरन रक्त एक लाख रूपवे या उससे कज हो तो रूपवे 2004 का भुगतान किया. जाए और यदि संसरन रक्त एक लाख रूपवे से ज्यादा हो ली इससे 1000 -/ का भुगालन किया जाए । (w) The revision application shall be accompanied by a fee of Rs. 200/- where the amount involved in Rupees One Lac or less and Rs. 1000/- where the amount involved is more than Rupees One Lac.
- पदि इस आदेश में कई मूल आदेशों का समावेश है तो प्रत्येक मूल आदेश के लिए शुल्क का भूगतान, उपयुंकत देन से किया जाता साहिये। इस तथ्य के होते हुए भी की लिखा पही कार्य से बचने के लिए यथादिश्वीय जयायिकरण की एक अधील या केट्रीय माकार की एक आदेत किया जाता है। I In case, if the order covers various numbers of order- in Original, fee for each QLO, should be paid in the aforesaid manner, not withstanding the fact that the one appeal to the Appellant Tribunal or the one application to the Central Govt. As the case may be, is filled to avoid scriptoria work if excising Rs. 1 lakin fee of Rs. 1004 for each (D)
- ययालगोधित जनायालय शुल्क अधिवियम, 1975, के अनुसूधीन के अनुसार मूल आदेश एवं उध्यतन आदेश की पति यह जिप्तीरेल 6.50 तपने का जनायलय शुल्क दिकिंट तथा होना पाहिए। / One copy of application or 0.1.0, as the case may be, and the order of the adjudicating authority shall bear a court fee stamp of Ra. 6.50 as prescribed under Schedule-1 in terms of the Court Fee Act.1975, as amended. (E)
- নীয়া বুলক, কিন্দ্ৰীৰ সংঘাত হুলক যথ নীয়াকৰ স্বামিনিয় ন্যায়ায়িকংগা (ৰহেট হিমি) নিয়নায়লী, 1982 ন বাৰ্টনি গণ সময় মৰান্যিন নামনত ক মন্দিমানিৰ ৰহন বান নিয়নী কী और মী ম্যান ভাকৰিন কিন্দ্ৰ জানো है। / Attention is also invited to the rules covering these and other related matters contained in the Customs, Excise and Service Appellate Tribunal (Procedure) Rules, 1982 (F)
- उदय अपीलीय व्यप्तिकारी को ज़मील शांधिल करने से संबंधित त्यापक, तिरन्त और जवीनतक प्रवधानी के लिए, अमीलाधी विश्वामीय वेक्सवुट (G) www.cbec.gov.in 动 改訂 副单击 首 1 / For the claborate, detailed and latest provisions relating to filing of appeal to the higher appellate authority, the appellant may ligher to the Departmental website www.cbec.gov.in

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:: ORDER IN APPEAL ::

M/s. Kunal Structure (India) Pvt Ltd, Kunal House, Ganga Park, Plot No.10, Opp. Sanskruti Apartment, Panchvati Road, Rajkot-360001 (hereinafter referred to as "the Appellant") has filed present appeal against Order-in-Original No. 147/ST/REF/2016 dated 11.11.2016 (hereinafter referred to as "the impugned order"), passed by the Assistant Commissioner, Service Tax Division, Rajkot (hereinafter referred to as the "lower adjudicating authority").

2. Briefly stated, facts of the case are that appellant had filed refund claim of interest of Rs. 60,17,196/- in terms of Section 101 of the Finance Act, 2016. The lower adjudicating authority vide impugned order rejected refund claim being interest paid for late payment of service tax at the material time and Section 101 of Finance Act, 2016 deals with refund of service tax paid and not for interest paid.

 Being aggrieved with the impugned order, appellant has filed appeal, interalia, on the following grounds: -

(i) As per Sr No. 12 of the Notification 25/2012-ST dated 20.06.2012 there was confusion prevailing over the status of M/s. Sardar Sarovar Narmada Nigam Ltd (hereinafter referred to as M/s.SSNNL) and the appellants paid the service tax along with interest for the services provided to M/s. SSNNL during the period from 01.07.2012 to 29.01.2014. The lower adjudicating authority has erred in interpreting Section 101 of Finance Act, 2016. Section 11B of Central Excise Act, 1944(hereinafter referred to as the Act) is a relevant section for claiming refund of duty/tax as well as interest, if any, paid on such duty/tax. Hence, from the above, it is adequately clear that interest paid, on late payment of service tax in relation to which refund claim had been filed, is eligibleto be refunded as service tax on which an interest has been deposited, has been made exempt retrospectively vide Section 101 of Finance Act, 2016.

(ii) Interest is not a duty or tax and, it is an amount levied on account of delayed payment of tax and such interest is eventually based on the tax liability paid late. Now, when the tax itself has been exempt retrospectively the question of payment of interest does not arise on such exempted tax and the appellant should be granted refund of interest paid by them. The appellant relied on decisions in the case of Motherson Sumi System Ltd. reported as 2007 (208) ELT

Page No. 3 of 6

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209 (Tri. - Delhi) and Gemini Steel Tubes Ltd. reported as 2006 (194) ELT 88 (Tri. - Bang.).

4. Personal hearing in the matter was attended to by S/Shri Bishan R Shah, Chartered Accountant and Shri Pradeep Mishra, CFO of the Appellant who reiterated the Grounds of Appeal and submitted that Section 11B talks of refund of duty and interest; that being law abiding assessee, they have paid service tax and interest on delayed payment of Service tax; that now no service tax is payable due to Section 101 of the Finance Act, 2016, hence no interest is payable and hence as per case laws interest paid by them should also be refunded to them; that they would submit written submission within 7 days. Appellant in their written submission dated 24.11.2017 contended that as per the provisions of Section 11B of the Central Excise Act, 1944 made applicable to Service Tax, interest paid by them should be refunded to them.

FINDINGS: -

5. I have carefully gone through the facts of the case, impugned order, appeal memorandum and written as well as oral submissions made by the appellant. The issue to be decided is whether in the facts and circumstances of the present case, the impugned order passed by the lower adjudicating authority rejecting claim for refund of interest paid for late payment of service tax due to retrospective exemption vide Section 101 of Finance Act, 2016, is correct or not.

6. I find that the lower adjudicating authority vide impugned order rejected refund claim of Rs. 60,17,196/- being interest paid for late payment of service tax by the Appellant on the ground that service tax was to be paid in time by the Appellant but not paid in time and Section 101 of Finance Act, 2016 deals with refund of service tax and not refund of interest. The appellant has contended that when service tax has been exempted retrospectively, the question of payment of interest does not arise on such exempted service tax and the appellant should be granted refund of interest amount. I find that Central Government has granted retrospective exemption from payment of service tax in respect of taxable services provided to certain government authority or a board etc. for construction of canal, dam, etc. under Section 101 of the Finance Act, 2016, which reads as under: -

"SECTION 101. Special provision for exemption in certain cases relating to construction of canal, dam, etc. — (1) Notwithstanding anything contained in section 66B, no service tax shall be levied or collected during the period commencing from the 1st day of July, 2012 and ending with the 29th day of January, 2014 (both days inclusive) in respect of taxable services provided to an authority or a board or any other body —

set up by an Act of Parliament or a State Legislature; or

(ii) established by the Government,

with ninety per cent. or more participation by way of equity or control, to carry out any function entrusted to a municipality under article 243W of the Constitution, by way of construction, erection, commissioning, installation, completion, fitting out, repair, maintenance, renovation or alteration of canal, dam or other irrigation works.

(2) Refund shall be made of all such service tax which has been collected but which would not have been so collected had subsection (1) been in force at all material times.

(3) Notwithstanding anything contained in this Chapter, an application for the claim of refund of service tax shall be made within a period of six months from the date on which the Finance Bill, 2016 receives the assent of the President.

(Emphasis supplied)

It could be seen that Section 101(1) of Finance Act, 2016 grants retrospective 7. exemption in respect of taxable services provided during the period from 01.07.2012 to 29.01.2014 to a government / local government authority or a board or any other body set up by an Act of Parliament or a State Legislature; or established by the Government; Section 101(2) of the Act states that refund shall be made of all such service tax which has been collected but which would not have been so collected had Section 101 (2) been in force at all material time. In the instant case, the appellant had paid service tax on taxable services provided to M/s. SSNNL by them during the said exempted period and had collected it from the service receiver. I find that the service receiver had paid the amount of Service Tax to the Appellant as per their business terms and conditions. In these circumstances all liabilities lie with the service recipient to fulfill the obligations between them and the Appellant. Once, service recipient pays the amount of service tax to the Appellant, question of refund of service tax by department does not arise and since no refund of service tax arises, no liability lies with the department in terms of Section 101 of the Finance Act, 2016 to refund Service Tax or Interest on Service Tax paid by the Appellatn due to late paymentof Service Tax at the material time. I find that the appellant had paid interest amount as they had failed to deposit service tax in Government account within stipulated time limit at the material time. I also find that the statutory provisions

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exempt levy of service tax retrospectively for the service tax collected and not interest on such tax. Hence, I hold that the appellant is not entitled for refund of interest or late fee, if paid. Therefore, the impugned order rejecting refund of interest is correct, legal and proper.

 In view of above, I uphold the impugned order and reject the appeal filed by the appellant.

९. अपीलकर्ता दवारा दर्ज की गई अपील का निपटारा उपरोक्त तरीके से किया जाता है।

9.

The appeal filed by the appellant stands disposed off in above terms.

TIAINON (कुर्मार संतोष)

आयुक्त (अपील्स)

By Regd. Post AD

M/s. Kunal Structure (indi) Pvt Ltd,	में, कुलास स्टूक्चर (इंडिया) प्रा लिमिटेड
Kunal House, Ganga Park,	कुणाल हाउस ,गंगा पार्क
Plot No.10, Opp. Sanskruti Apartment,	प्लॉट नं १० ,संस्कृति अपार्टमेंट , पंचवटी रोड
Panchvati Road, Rajkot-360001	राजकोट ३६०००१

Copy to:

1) The Chief Commissioner, GST & Central Excise, Ahmedabad Zone, Ahmedabad.

2) The Commissioner, GST & Central Excise Commissionerate, Rajkot.

3) The Assistant Commissioner, GST & Central Excise Division-I, Rajkot.

4) Guard File.