



आयुक्त(अपील) का कार्यालय,
Office of the Commissioner (Appeal),



केंद्रीय जीएसटी, अपील आयुक्तालय, अहमदाबाद
Central GST, Appeal Commissionerate, Ahmedabad
जीएसटी भवन, राजस्वमार्ग, अम्बावाड़ी अहमदाबाद 380015.
CGST Bhavan, Revenue Marg, Ambawadi, Ahmedabad 380015
☎ 07926305065 - टेलीफैक्स 07926305136

DIN : 20220564SW0000222B12

स्पीड पोस्ट

- क फाइल संख्या : File No : GAPPL/COM/STD/142/2021 /1047 70 1051
- ख अपील आदेश संख्या Order-In-Appeal Nos. AHM-EXCUS-003-APP-22/2022-23
दिनांक Date : 30-05-2022 जारी करने की तारीख Date of Issue 31.05.2022
- आयुक्त (अपील) द्वारा पारित
Passed by Shri Akhilesh Kumar, Commissioner (Appeals)
- ग Arising out of Order-in-Original No. AHM-CEX-003-ADC-PMR-010-/20-21 दिनांक: 29.01.2021
passed by Additional Commissioner, CGST & Central Excise, Gandhinagar Commissionerate
- ध अपीलकर्ता का नाम एवं पता Name & Address

1. Appellant

The Assistant Commissioner
CGST Division Gandhinagar
Central GST Bhawan,
1st Floor, Sector 10A,
Nr. CH-3 Circle, Opp. St. Xavier's School,
Gandhinagar – 382010

2. Respondent

[M/s Baroda Gujarat Gramin Bank
[Formerly known as M/s Dena Gujarat Gramin Bank]
Head Office 3rd and 4th Floor,
Suraj Plaza-1, Sayajiganj, Vadodara-390020

कोई व्यक्ति इस अपील आदेश से असंतोष अनुभव करता है तो वह इस आदेश के प्रति यथास्थिति नीचे बताए गए सक्षम अधिकारी को अपील या पुनरीक्षण आवेदन प्रस्तुत कर सकता है।

Any person aggrieved by this Order-In-Appeal may file an appeal or revision application, as the one may be against such order, to the appropriate authority in the following way :

भारत सरकार का पुनरीक्षण आवेदन :

Revision application to Government of India:

(i) केन्द्रीय उत्पादन शुल्क अधिनियम, 1994 की धारा अतत नीचे बताए गए मामलों के बारे में पूर्वोक्त धारा को उप-धारा के प्रथम परन्तुक के अंतर्गत पुनरीक्षण आवेदन अधीन सचिव, भारत सरकार, वित्त मंत्रालय, राजस्व विभाग, चौथी मंजिल, जीवन दीप भवन, संसद मार्ग, नई दिल्ली : 110001 को की जानी चाहिए।

(ii) A revision application lies to the Under Secretary, to the Govt. of India, Revision Application Unit Ministry of Finance, Department of Revenue, 4th Floor, Jeevan Deep Building, Parliament Street, New Delhi - 110 001 under Section 35EE of the CEA 1944 in respect of the following case, governed by first proviso to sub-section (1) of Section-35 ibid :

(iii) यदि माल की हानि के मामले में जब ऐसी हानिकार खाने से किसी भण्डागार या अन्य कारखाने में या किसी भण्डागार से दूसरे भण्डागार में माल ले जाते हुए मार्ग में, या किसी भण्डागार या भण्डार में चाहे वह किसी कारखाने में या किसी भण्डागार में हो माल की प्रक्रिया के दौरान हुई हो।

(ii) In case of any loss of good: where the loss occur 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 warehouse.

(क) भारत के बाहर किसी राष्ट्र या प्रदेश में निर्यातित माल पर या माल के विनिर्माण में उपयोग शुल्क कच्चे माल पर उत्पादन शुल्क के रिबेट के मामलों में जो भारत के बाहर किसी राष्ट्र या प्रदेश में निर्यातित हैं।

(A) In case of rebate of duty of excise on goods exported to any country or territory outside India of on excisable material used in the manufacture of the goods which are exported to any country or territory outside India.

(ख) यदि शुल्क का भुगतान किए बिना भारत के बाहर (नेपाल या भूटान को) निर्यात किया गया माल हो।

(B) In case of goods exported outside India export to Nepal or Bhutan, without payment of duty.

अंतिम उत्पादन की उत्पादन शुल्क के भुगतान के लिए जो ड्यूटी क्रेडिट मान्य की गई है और ऐसे आदेश जो इस धारा एवं नियम के मुताबिक आयुक्त, अपील के द्वारा पारित वो समय पर या बाद में वित्त अधिनियम (नं.2) 1998 धारा 109 द्वारा नियुक्त किए गए हों।

(c) 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 and such order is passed by the Commissioner (Appeals) on or after, the date appointed under Sec.109 of the Finance (No.2) Act, 1998.

(1) केन्द्रीय उत्पादन शुल्क (अपील) नियमावली, 2001 के नियम 9 के अंतर्गत विनिर्दिष्ट प्रपत्र संख्या ईए-8 में दो प्रतियों में, प्रेषित आदेश के प्रति आदेश प्रेषित दिनांक से तीन मास के भीतरमूल-आदेश एवं अपील आदेश की दो-दो प्रतियों के साथ उचित आवेदन किया जाना चाहिए। उसके साथ खाता इ.का मुख्य शीर्ष के अंतर्गत धारा 35-इ में निर्धारित फी के भुगतान के सबूत के साथ टीआर-6 चालान की प्रति भी होनी 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.

(2) रिविजन आवेदन के साथ जहाँ संलग्न रकम एक लाख रुपये या उससे कम होतो रुपये 200/- फीस भुगतान की जाए और जहाँ संलग्नरकम एक लाख से ज्यादा हो तो 1000/- की फीस भुगतान की जाए।

The revision application shall be accompanied by a fee of Rs.200/- where the amount involved is Rupees One Lac or less and Rs.1,000/- where the amount involved is more than Rupees One Lac.

सीमा शुल्क, केन्द्रीय उत्पादन शुल्क एवं सेवा कर अपीलीय न्यायाधिकरण के प्रति अपील:-
Appeal to Custom, Excise, & Service Tax Appellate Tribunal.

(1) केन्द्रीय उत्पादन शुल्क अधिनियम, 1944 की धारा 35-बी/35-इ के अंतर्गत:-

Under Section 35B/ 35E of CEA, 1944 an appeal lies to :-

(क) उक्तलिखित परिच्छेद 2 (1) क में बताए अनुसार के अलावा की अपील, अपीलो के मामले में सीमा शुल्क, केन्द्रीय उत्पादन शुल्क एवं सेवाकर अपीलीय न्यायाधिकरण(सिस्टेट) की पश्चिम क्षेत्रीय पीठिका, अहमदाबाद में 2ndमाला, बहुमाली भवन, असरवा, गिरधरनागर, अहमदाबाद-380004

(a) To the west regional bench of Customs, Excise & Service Tax Appellate Tribunal (CESTAT) at 2nd floor, Bahumali Bhawan, Asarwa, Girdhar Nagar, Ahmedabad : 380004. in case of appeals other than as mentioned in para-2(i) (a) above.



The appeal to the Appellate Tribunal shall be filed in quadruplicate in form EA-3 as prescribed under Rule 6 of Central Excise(Appeal) Rules, 2001 and shall be accompanied against (one which at least should be accompanied by a fee of Rs.1,000/-, Rs.5,000/- and Rs.10,000/- where amount of duty / penalty / demand / refund is upto 5 Lac, 5 Lac to 50 Lac and above 50 Lac respectively in the form of crossed bank draft in favour of Asstt. Registrar of a branch of any nominate public sector bank of the place where the bench of any nominate public sector bank of the place where the bench of the Tribunal is situated.

- (3) यदि इस आदेश में कई मूल आदेशों का समावेश होता है तो प्रत्येक मूल आदेश के लिए फीस का भुगतान उपर्युक्त ढंग से किया जाना चाहिए इस तथ्य के होते हुए भी कि लिखा पढ़ी कार्य से बचने के लिए यथास्थिति अपीलीय न्यायाधिकरण को एक अपील या केन्द्रीय सरकार को एक आवेदन किया जाता है।

In case of the order covers a number of order-in-Original, fee for each O.I.O. should be paid in the aforesaid manner notwithstanding 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 lacs fee of Rs.100/- for each.

- (4) न्यायालय शुल्कअधिनियम 1970 यथासंशोधित की अनुसूची-1 के अंतर्गत निर्धारित किए अनुसार उक्त आवेदन या मूलआदेश यथास्थिति निर्णयन प्राधिकारी के आदेश में से प्रत्येक की एक प्रतिपर रु.6.50 पैसे का न्यायालय शुल्क टिकट लगा होना चाहिए।

One copy of application or O.I.O. as the case may be, and the order of the adjournment authority shall a court fee stamp of Rs.6.50 paise as prescribed under scheduled-I item of the court fee Act, 1975 as amended.

- (5) इन ओर संबंधित मामलों को नियंत्रण करने वाले नियमों की ओर भी ध्यान आकर्षित किया जाता है जो सीमा शुल्क, केन्द्रीय उत्पादन शुल्क एवं सेवाकर अपीलीय न्यायाधिकरण (कार्याविधि) नियम, 1982 में निहित है।

Attention is invited to the rules covering these and other related matter contended in the Customs, Excise & Service Tax Appellate Tribunal (Procedure) Rules, 1982.

- (47) सीमा शुल्क, केन्द्रीय उत्पादन शुल्क एवं सेवाकर अपीलीय न्यायाधिकरण(सिस्टेट), के प्रतिअपीलो के मामले में कर्तव्यमांग(Demand) एवं दंड(Penalty) का 10% पूर्व जमा करना अनिवार्य है। हालांकि, अधिकतम पूर्व जमा 10 करोड़ रुपए है।(Section 35 F of the Central Excise Act, 1944, Section 83 & Section 86 of the Finance Act, 1994)

केन्द्रीय उत्पाद शुल्क और सेवाकर के अंतर्गत, शामिल होगा "कर्तव्य की मांग"(Duty Demanded)-

- (Section) खंड 11D के तहत निर्धारित राशि;
- लिया गलत सेनवैट क्रेडिट की राशि;
- सेनवैट क्रेडिट नियमों के नियम 6 के तहत देय राशि.

⇒ यह पूर्व जमा 'लंबित अपील' में पहले पूर्व जमा की तुलना में, अपील दाखिल करने के लिए पूर्व शर्त बना दिया गया है.

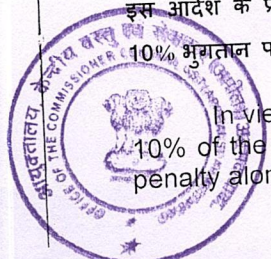
For an appeal to be filed before the CESTAT, 10% of the Duty & Penalty confirmed by the Appellate Commissioner would have to be pre-deposited, provided that the pre-deposit amount shall not exceed Rs.10 Crores. It may be noted that the pre-deposit is a mandatory condition for filing appeal before CESTAT. (Section 35 C (2A) and 35 F of the Central Excise Act, 1944, Section 83 & Section 86 of the Finance Act, 1994)

Under Central Excise and Service Tax, "Duty demanded" shall include:

- (cxxiv) amount determined under Section 11 D;
- (cxxv) amount of erroneous Cenvat Credit taken;
- (cxxvi) amount payable under Rule 6 of the Cenvat Credit Rules.

इस आदेश के प्रति अपील प्राधिकरण के समक्ष जहाँ शुल्क अथवा शुल्क या दण्ड विवादित हो तो माँग किए गए शुल्क के 10% भुगतान पर और जहाँ केवल दण्ड विवादित हो तब दण्ड के 10% भुगतान पर की जा सकती है।

In view of above, 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."

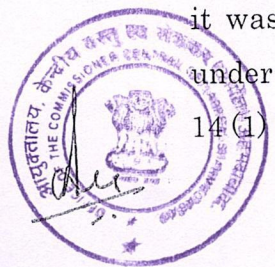


ORDER-IN-APPEAL

The present appeal has been filed by the Assistant Commissioner, Central GST, Gandhinagar Division, Commissionerate- Gandhinagar (hereinafter referred to as the appellant), on the basis of Review Order No. 04/2021-22 dated 17.05.2021 passed by the Commissioner, Central GST & Central Excise, Gandhinagar Commissionerate in terms of Section 84 of the Finance Act, 1994 against Order in Original No. AHM-CEX-003-ADC-PMR-010-20-21 dated 29.01.2021 [hereinafter referred to as "*impugned order*"] passed by the Additional Commissioner, CGST & Central Excise, Commissionerate- Gandhinagar [hereinafter referred to as "*adjudicating authority*"] in the case of M/s. Dena Gujarat Gramin Bank, 1st Floor, Dena Laxmi Building, GH-5, Sector-16, Gandhinagar (now M/s.Baroda Gujarat Gramin Bank) [hereinafter referred to as the respondent].

2. Briefly stated, the facts of the case is that during the course of audit of the records of the respondent, for the period from April, 2016 to June, 2017, conducted by the departmental audit officers, it was observed that the respondent had availed cenvat credit of the service tax paid by them for insuring the deposits accepted by them. It appeared that the said cenvat credit was inadmissible as the same were not used for providing their output service. On being pointed out the objection, the respondent had verbally stated that they had to mandatorily take insurance of all their deposits as per the guidelines of RBI and it was a statutory requirement. The respondent had during the period F.Y. 2014-15 to F.Y. 2016-17 (upto June, 2017) taken cenvat credit amounting to Rs.78,42,030/- in respect of the service tax paid on the insurance of deposits which appeared to be inadmissible and liable to be recovered from them.

2.1 The respondent was issued Show Cause Notice bearing No. VI/1(b)/CTA/Tech-36/SCN/Dena Gramin/2019-20 dated 19.09.2019 wherein it was proposed to recover the service tax amounting to Rs. 78,42,030/- under the proviso to Section 73 (1) of the Finance Act, 1994 read with Rule 14 (1) (ii) of the Cenvat Credit Rules, 2004 along with interest under Section



75 of the Finance Act, 1994 read with Rule 14 (1) (ii) of the CCR, 2004. Imposition of penalty under Section 78 of the Finance Act, 1994 read with Rule 15 (3) of the CCR, 2004 was also proposed. The said SCN was adjudicated vide the impugned order wherein the demand raised against the respondent was dropped.

3. Being aggrieved with the impugned order the appellant department has filed the instant appeal on the following grounds:

- i) The insurance service provided by the Deposit Insurance & Credit Guarantee Corporation (DICGC) is not an input service for the purpose of CCR, 2004. The receipt of amounts by the banks from persons by way of deposit cannot be service at all within the meaning of Section 65B (44) of the Finance Act, 1994.
- ii) Cenvat credit cannot be availed by the banks in respect of service tax paid for insurance received by them from DICGC under the Deposit Insurance and Credit Guarantee Corporation Act, 1961.
- iii) Banking service defined in Section 65 (12) does not consider receiving deposits as a banking service at all. Further, the banks do not charge any consideration for accepting or maintaining deposits and hence, it cannot be treated as a service for the purpose of Service Tax or as an output service as defined in Rule 2 (p) of the CCR, 2004.
- iv) The adjudicating authority ought to have noted that an assessee would be entitled to cenvat credit of service tax paid only on input services as defined in Rule 2 (1) of the CCR, 2004 and on satisfaction of the conditions under Rule 3 read with Rule 2 (1) of the CCR, 2004 as amended w.e.f. 01.04.2011 by deletion of a general clause 'activities relating to business such as' from the inclusive part.
- v) Stretching the scope of clause (i) of the main part of the definition of input service in Rule 2 (1) of the CCR, 2004 to cover even those services having only a remote or indirect nexus with some output service, would render the inclusive part of the definition redundant. Reliance is placed upon the decision of the Hon'ble



Supreme Court in the case of Nathi Devi Vs. Radha Devi Gupta – AIR 2005 SC 648. Reliance is also place upon the decision in the case of T.M.A. Pai Foundation Vs. State of Karnataka – (2002) 8 SCC 481 and Collector of Central Excise, Pune Vs. Tata Engineering & Locomotives – (2003) 11 SCC 193.

- vi) The adjudicating authority ought to have recognized that there is no direct nexus between the deposit insurance service received by them and any of the output service of the bank.
- vii) The adjudicating authority ought to have recognized that the nexus of deposit insurance with services associated with lending such as processing of loan application, documentation, inspection etc. is even more indirect and remote, being connected only through the money generated by accepting deposits which forms part of the pool of fund used for lending to earn interest.
- viii) The adjudicating authority has committed interpretational error of the CCR, 2004. He should have appreciated the intent of the amendment made vide Notification No. 3/2011-CE(NT) dated 01.03.2011 which redefined the term input service. He ought to have appreciated that the specific entries retained in the inclusive part of the definition of input services did not cover deposit insurance service.
- ix) It is a well settled principle that while interpreting an amended rule, it is necessary to consider how the matter stood immediately before the amendment, what was the mischief for which the old law did not provide, and the remedy which has been provided by the amendment.
- x) The adjudicating authority has heavily relied on the fact that obtaining DICGC insurance is mandatory for a regional rural bank to begin, continue and sustain its business as per Section 11A of the Deposit Insurance and Credit Guarantee Corporation Act, 1961. Hence, availment of cenvat credit in respect of DICGC insurance premium was an input service and fell within the ambit of Rule 2 (l) of the CCR, 2004.



- xi) The adjudicating authority has failed to appreciate that availment and utilization of cenvat credit is governed solely by CCR, 2004 and in the process has ignored that deposit insurance is not linked to any output service or for that matter any service.
- xii) usage of the words 'any service' and 'used for' in the definition under Rule 2 (1) gave a very broad definition that any service used for providing output service was termed input service

4. The respondent filed their cross-objections vide letter dated 10.05.2022, wherein it was, inter-alia, submitted that :

- The main banking functions of the bank are collecting deposits and lending from the accumulated funds. Lending is possible only from the accumulated funds. The quantum of loans depends directly on the size of deposits received. Thus, the lending activity has direct nexus to deposits.
- The services by way of extending deposits, loans or advances insofar as the consideration is represented by way of interest or discount is outside the purview of service tax as per Section 66D (n)(i). But they collect various other charges other than interest from the deposit holders viz. cheque book facility charges, issue of duplicate passbook, ATM cards, Stop Payment, Signature verification, cheque inward return etc. under the guidelines of RBI from time to time. These charges are subjected to service tax and they regularly pay service tax on such charges.
- The bank lend money only after it collects deposits. Thus, lending of money is direct and incidental consequence of collection of deposits. Hence, the activity of collecting deposits is an input activity and they are rightly entitled to cenvat credit of the service tax paid on insurance paid on such deposits.
- Under Section 11A of the Deposit Insurance and Credit Guarantee Corporation Act, 1961, every Regional Bank is required to be registered as an 'Insured Bank' before the expiry of thirty days from the date of its establishment. Thus, DICGC insurance premium is a



statutory obligation and is paid for insuring the bank and not the individual depositor of the bank.

- Under Section 15A (1) of the Deposit Insurance and Credit Guarantee Corporation Act, 1961, the registration of an insured bank may be cancelled if it fails to pay the premium for three consecutive periods i.e. three consecutive six months. In such an event, of DICGC withdrawing its coverage, they intimate the general public through notification in newspaper. The obvious result is that their goodwill is adversely affected and depositors will immediately demand their money causing disruption in the banking business. Hence, they would have to discontinue operations and face liquidation. Thus, failure to pay DICGC insurance premium directly impacts their provision of output services. Accordingly, the DICGC insurance premium has direct nexus to the output service of lending money. Therefore, they are rightly entitle to cenvat credit of the insurance premium paid on their deposits.
- DICGC insurance premium is an input service for continuing as an output service provider and thus, falls within the ambit of Rule 2 (1) of the CCR, 2004.
- They rely upon the decision in the following cases : DCB Bank Ltd. Vs. Commissioner of Service Tax-I, Mumbai – 2017-TIOL-2849-CESTAT-Mum; Punjab National Bank Vs. Commissioner of Central Excise and Service Tax, Bhopal – 2018 TIOL-1395-CESTAT-Del; State Bank of Bikaner and Jaipur Vs. Commissioner of Central Excise and Service Tax, Jaipur-I – 2019-TIOL-558-CESTAT-Del; State Bank of Patiala Vs. Commissioner of Central Excise and Service Tax, Chandigarh-II – 2019-10-TMI-818-CESTAT-CHD-ST; South Indian Bank Vs. Commissioner of Customs, Central Excise and Service Tax, Calicut – 2020-TIOL-861-CESTAT-Bang.-LB; Commissioner of Central Excise, Bangalore Vs. PNB Metlife India Insurance Co. Ltd.- 2015 (39) STR 561 (Kar.); Shriram Life Insurance Company Ltd. V. Commissioner of Customs, Central Excise and Service Tax, Hyderabad – 2019-TIOL-1087-CESTAT-Hyd.; Tamil Nadu State Apex



Co-operative Bank Vs. Commissioner of GST & CE – 2021-TMI-1023-CESTAT-Chennai.

- The Larger Bench of the Hon'ble Tribunal had in the case of South Indian Bank held that insurance service provided by DICGC is an input service and cenvat credit of the service tax paid can be availed by the banks for rendering output services. Thus the main issue in the appeal is already decided in their favour. Therefore, the appeal filed by the department be rejected.

5. Personal Hearing in the case was held on 24.05.2022 through virtual mode. Shri Keyur Mehta, Chartered Accountant, and Shri A.M. Putliwala, Senior Manager, appeared on behalf of the respondent for the hearing. They reiterated the submissions made in the cross-objection to the appeal.

6. I have gone through the facts of the case, submissions made in the Appeal Memorandum, the submissions made in the cross-objections, those made at the time of personal hearing and material available on records. The issue before me for decision is whether the cenvat credit in respect of the service tax paid on the Insurance Premium of DICGC is admissible to the respondent or otherwise. The demand pertains to the period F.Y. 2014-15 to F.Y. 2016-17 (upto June, 2017).

7. I find that the facts of the case are not disputed. Having considered the facts of the case, I find that the issue in hand is no more *res integra* in view of the judgment of the Larger Bench of the Hon'ble Tribunal in the case of South Indian Bank Vs. Commissioner of Customs & C.Ex. & St, Calicut – 2020 (41) GSTL 609 (Tri.-LB). It was held by the Hon'ble Tribunal in the case that :

“65. The reference is, accordingly, answered in the following terms :

“The insurance service provided by the Deposit Insurance Corporation to the banks is an “input service” and Cenvat credit of service tax paid for this service received by the banks from the Deposit Insurance Corporation can be availed by the banks for rendering ‘output services’.” ”

11.1 The above judgment of the Hon'ble Tribunal was followed by the Hon'ble Tribunal in the case of Tamil Nadu State Apex Co-op Bank Vs.



Commissioner of GST & Central Excise, Chennai – 2021 (50) GSTL 437 (Tri-Chennai). Further, in the case of Bank of Maharashtra Vs. Commissioner of CGST and C.Ex., Pune-II – 2020 (42) GSTL 491 (Bom.), the Hon'ble High Court of Bombay had held that ;

11. We find that a three-member Bench of CESTAT, Bangalore had delivered judgment on 20-3-2020 [2020 (41) G.S.T.L. 609 (Tri. - LB)]. As already noticed above, the service provided by the Deposit Insurance and Credit Guarantee Corporation to the banks for insuring the deposits of the public with the banks has been considered by the banks to be an input service and CENVAT credit for service tax paid by the banks for this service has been availed of by the banks for rendering output service. The issue involved is whether the banks can avail credit of this service tax paid by the banks for the service provided by the Deposit Insurance Corporation.

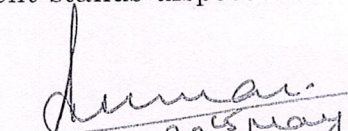
...
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12. In view of the decision rendered by the Larger Bench of CESTAT, the impugned order dated 12-2-2019 cannot be sustained and the same is accordingly set aside and quashed. All the appeals are remanded back to the CESTAT for fresh decision in conformity with the decision rendered by the Larger Bench.

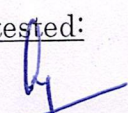
11.2. Therefore, following the judgments of the Hon'ble Tribunal and the Hon'ble High Court of Bombay, I hold that cenvat credit of the Service Tax paid on Insurance Premium of DICGC is admissible to the Respondent. Accordingly, I uphold the impugned order and reject the appeal filed by the appellant department.

12. अपीलकर्ता द्वारा दर्ज की गई अपील का निपटारा उपरोक्त तरीके से किया जाता है।

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


(Akhilesh Kumar)
Commissioner (Appeals)

Attested:


(N.Suryanarayanan. Iyer)
Superintendent(Appeals),
CGST, Ahmedabad.

Date: .05.2022.

BY RPAD / SPEED POST

To



The Assistant Commissioner,
CGST & Central Excise,
Division- Gandhinagar ,
Commissionerate : Gandhinagar

Appellant

M/s. Dena Gujarat Gramin Bank,
Head Office, 3rd and 4th Floor,
Suraj Plaza-1,
Sayajiganj, Vadodara – 390 020

Respondent

Earlier at :
1st Floor, Dena Laxmi Building,
GH-5, Sector-16, Gandhinagar

Copy to:

1. The Chief Commissioner, Central GST, Ahmedabad Zone.
2. The Commissioner, CGST, Gandhinagar.
3. The Assistant Commissioner (HQ System), CGST, Gandhinagar.
(for uploading the OIA)
4. Guard File.
5. P.A. File.



