

**OFFICE OF THE INCOME TAX OFFICER (INT.TAXN.), 2(1), Kol.  
4<sup>TH</sup> FLOOR, AAYAKAR BHAWAN,  
P-7, CHOWRINGHEE SQUARE, KOLKATA - 700 069**

No. ITO (INT.TAXN.)/ 2(1)/KOL/ NOC/ 2010-11/ 235

Dated: 21.03.2011

Ref: Application dated 16.03.2011 received from M/s APL India Pvt. Ltd.,  
acting as a Shipping agent in India of **M/s APL CO. PTE LTD., Singapore**

**To whomsoever it may concern**

This is to state that as per provisions of Article 8 of the Double Taxation Avoidance Agreement between India and Singapore profits derived by M/s APL Co. Pte Ltd., (PAN AAECA1501B), an enterprise of Singapore, from the operations of ships or aircrafts in international traffic shall be taxable only in Singapore.

This shall also apply to profits from the participation in a pool, a joint business or an international operating agency engaged in the operation of ships or aircrafts in international traffic.

Interest on funds connected with the operation of ships or aircrafts in international traffic shall be regarded as profits derived from the operations of such ships or Aircrafts, and the provisions of article 11 of the Double Taxation Avoidance Agreement between India and Singapore shall not apply in relation to such interest.

It is clarified that the profits from the operations of ships or aircrafts in Int.Traffic shall mean profits derived from the transportation by sea or air of passengers, mail, livestock or goods carrying on by the owners or lessees or charterers of the ships or aircrafts, including profits from :

- (a) the sale of tickets for such transportation on behalf of other enterprises,
- (b) the incidental lease of ships or aircrafts used in such transportation
- (c) the use, maintenance or rental of containers (including trailers and related equipment for the transport of containers) in connection with such transportation and
- (d) any other activity directly connected with such transportation.

This is not an Income Tax Port Clearance Certificate u/s 172 of the Income Tax Act and cannot be used as such. This certificate is valid up to 31.03.2012

For every voyage, Master of the vessel must invariably obtain a separate Port Clearance Certificate u/s 172 of the Income Tax Act as per the extant law and procedures.



  
21.03.2011  
( S.K.SAMANTA )  
I.TO. (Intl.Taxn.) - 2(1), Kolkata