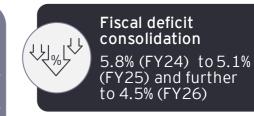


### Macro Fiscal | Key Highlights

- Growth: The interim budget has indicated a nominal GDP growth of 10.5%. Combining this with a real growth of 7% (MoF's review of the Indian economy), the underlying assumption for the implicit price deflator (IPD)-based inflation is at 3.3% for FY25.
- ► Tax revenues: Gross tax revenue (GTR) growth is budgeted at 11.5% in FY25 (BE), slightly lower than 12.5% in FY24 (RE). Given the high buoyancy of direct taxes, the actual GTR growth may turn out to be higher than budgeted.
  - ► Any additional revenues over and above the budgeted amounts can then be directed towards augmenting capital expenditure growth.
- **Expenditure priorities**: Revenue expenditure growth has been limited to 3.2% in FY25.
- ► Capital expenditure growth has been lowered to 16.9% in FY25 (BE) over FY24 (RE) as compared to 28.4% in FY24 (RE) over FY23 Actuals.
- ► The easing of capex growth may be partially neutralized by the continuation of the interest free loans to states for their capital expenditure.

- Social sector spending: Social sector spending on selected 10 major schemes (including MGNREGA, National Health Mission, National Education Mission, Pradhan Mantri Krishi Sinchai Yojna, Pradhan Mantri Awas Yojana) together amount to nearly INR4.3 lakh crore which is 12% of Gol's primary expenditure in FY25 (BE), slightly higher than 11.4% in FY24 (RE).
- Highest priority to fiscal consolidation: The fiscal deficit to GDP ratio is budgeted to fall by 70 basis points to 5.1% of GDP in FY25 (BE) from 5.8% in FY24 (BE).
- As Gol's fiscal deficit to GDP falls, both gross and net market borrowings to fall in FY25 (BE) from their FY24 (RE) levels. This would facilitate a lowering of the interest rate, facilitating private investment.
- The budget establishes a healthy balance of pursuing fiscal consolidation while not compromising on growth.





Strong capex growth

28.4% in FY24 (RE) and 16.9% in FY25 (BE)



Gross tax revenue growth is budgeted at 11.5% in FY25









### **Policy** | Key Highlights

- Research and Innovation: A corpus of INR100,000 crore to be provided with 50-year interest free loan. The corpus will provide long-term financing options for the private sector to scale up research and innovation significantly in sunrise domains.
- Financial assistance for procurement of biomass aggregation machinery.
- EVs: E-vehicle ecosystem to be expanded and strengthened by supporting manufacturing and charging infrastructure. Greater adoption of ebuses for public transport networks to be encouraged through payment security mechanism.
- Railways: To improve logistics efficiency and reduce cost, three major economic railway corridor programs to be implemented under PM Gati Shakti:
  - energy, mineral and cement corridors,
  - port connectivity corridors, and
  - high traffic density corridors

- Attracting foreign investment: The FDI inflow during 2014-2023 was US\$596 billion. To encourage sustained foreign investment, the government is negotiating bilateral investment treaties with other foreign partners. Also, the India-Middle East-Europe Economic Corridor is expected to be an economic game changer for India.
- Viksit Bharat Reforms in States: To support the State Governments to enable Viksit Bharat reforms, a provision of INR75,000 crore as 50-year interest free loans to be provided.
- Bio-manufacturing/promoting regenerative practices: A new scheme of bio-manufacturing and bio-foundry would be launched. This will provide environment friendly alternatives such as biodegradable polymers, bio-plastics, biopharmaceuticals and bio-agri-inputs.
- Agriculture and Food processing: Government to promote private and public investment in postharvest activities including aggregation, modern storage, efficient supply chains, primary and secondary processing and marketing and branding.





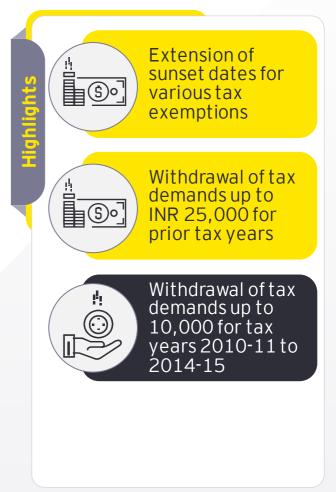






### Corporate Tax (1/2) | Key Highlights

- ► Extension of sunset date from 31 March 2024 to 31 March 2025 for claim of exemption in respect of specified incomes:
  - Date of commencement of operations by Investment Division of Offshore Banking Unit in International Financial Services Centre (IFSC), to claim exemption in respect of specified income attributable to such investment division.
  - Date of commencement of operations by a unit in IFSC, for exemption in respect of royalty or interest income of a non-resident received from a unit in IFSC on account of lease of aircraft/ ship.
  - Date of commencement of operations by a unit in IFSC, for exemption on gains arising on transfer of aircraft or ship leased by the IFSC unit
  - ▶ Date of making specified investment by specified funds, for claiming exemption on certain income from such investments.
  - Date for incorporation of start-ups, to be eligible for tax holiday.
- ► The time limit for issuance of notification for faceless proceedings for transfer pricing assessment, faceless proceedings before Dispute Resolution Panel and faceless appeal proceedings before Tribunal is extended from 31 March 2024 to 31 March 2025.
- ▶ Withdrawal of tax demands up to 10,000 for tax years 2010-11 to 2014-15 and up to INR 25,000 for prior tax years.





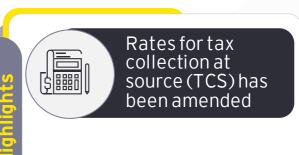




### Corporate Tax (2/2) | Key Highlights

▶ To codify the announcements made by the Ministry of Finance vide Press Release dated 28 June 2023, the rates for tax collection at source (TCS) has been amended w.e.f. 1 October 2023 in respect of specified items as follows:

Nature of payment	Rate of TCS applicable	
Liberalised Remittance Scheme (LRS) for education financed by loan from qualifying financial institutions	<ul><li>NIL up to INR700,000</li><li>0.5% above INR700,000</li></ul>	
LRS for medical treatment and education (other than financed by loan from qualifying financial institution)	<ul><li>NIL up to INR700,000</li><li>5% above INR700,000</li></ul>	
LRS for other purposes	<ul><li>NIL up to INR700,000</li><li>20% above INR700,000</li></ul>	
Purchase of Overseas Tour Program Package	<ul><li>5% till INR700,000</li><li>20% thereafter</li></ul>	













### **Indirect Tax** | Key Highlights

#### Input Service Distributor

- Input tax credit on services meant for any offices of the same legal entity shall be required to be mandatorily distributed through the Input Service Distributor (ISD) mechanism by the office receiving the invoice.
- ▶ Such an office receiving invoices needs to take ISD registration.
- ▶ Penalty on non-registration of machines: tobacco and tobacco-related products
  - Penalty to be levied for failure to register packing machines used in the manufacture of tobacco and tobacco-related products as per the special procedure.
  - Further, such machines can be seized and confiscated in certain cases and circumstances.





Penalty introduced for non-registration of machines – tobacco tobacco related and products





# Budget 2024 | Sectors wise data

Agriculture



Chemicals



Aerospace and Defense



Financial Services



Infrastructure



Pharma and Lifesciences





Oil and Gas



**Real Estate** 



Startup



**Technology** 



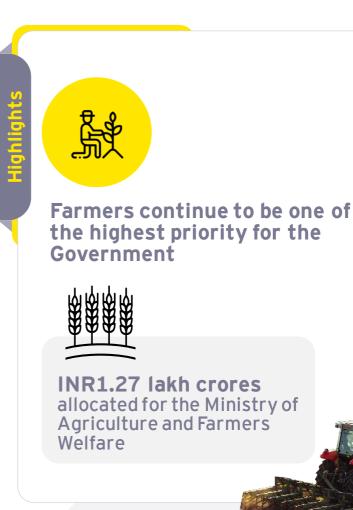
Telecom



**Energy** 

# Agriculture (1/2) | Key Highlights

- ▶ Allocation of INR1.27 lakh crore towards the Ministry of Agriculture and Farmers Welfare.
- ► Increased allocation of INR880 crores for Pradhan Mantri Formalization of Micro Food Processing Enterprises Scheme.
- For promoting fast growth of the sector, further promotion of private and public investment in post-harvest activities, including aggregation, modern storage, efficient supply chains and processing.
- ▶ Application of Nano DAP on various crops to be expanded in all agro-climatic zones.
- ► Strategy to be formulated to achieve 'atmanirbharta' for oil seeds. This includes undertaking research for high yielding varieties, adoption of modern farming techniques, value addition, and crop insurance.
- ► Comprehensive program for supporting dairy farmers to be formulated to improve the productivity.
- ► For promoting green growth, a new scheme of bio-manufacturing and bio-foundry is to be launched to provide environment friendly alternatives such as bio agri-inputs (apart from biodegradable plastics).



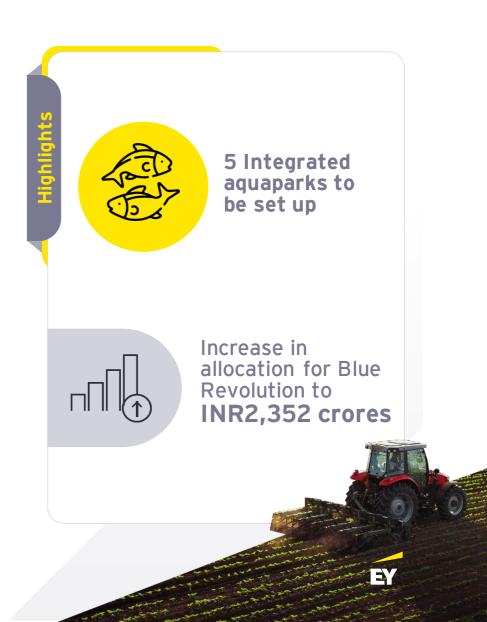




# Agriculture (2/2) | Key Highlights

#### Fisheries

- Implementation of Pradhan Mantri Matsya Sampada Yojana to be stepped up to enhance aquaculture productivity, boost exports and generate employment opportunities.
- Five integrated aquaparks to be set up.
- ▶ Increased allocation of INR2,352 crores for the Blue Revolution.









### Chemicals | Key Highlights

#### Specialty chemicals and construction chemicals

Positive impact on account of infrastructure sector announcements such as the railway corridor program, refurbishment of 40 thousand normal rail bogies to the Vande Bharat standards, expansion of Metro rail and airports and construction of two crore more houses under Pradhan Mantri Awas Yojna.

#### Silicon

Impetus provided to rooftop solarization enabling one crore households to obtain up to 300 units of free electricity per month), may positively impact silicon businesses.

#### ▶ Lithium-ion for manufacturing electric vehicle batteries

▶ Business of lithium-ion may get a boost from the expansion and strengthening of Electric Vehicle (EV) ecosystem through government support to manufacturing and charging infrastructure and encouragement to e-buses for public transport network.

#### ▶ Indian bio-polymer

A new scheme of bio-manufacturing and bio-foundry to be launched, providing environment friendly alternatives such as biodegradable polymers, bio-plastics, bio-pharmaceuticals and bio-agri-inputs. This may have a positive impact on varied speciality chemicals, including the Indian bio-polymer industry.

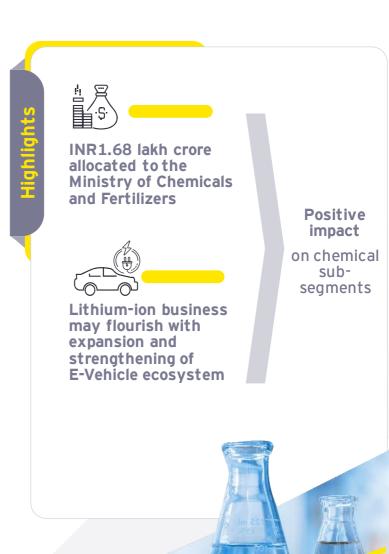
#### Agrochemicals

Agrochemical sector may get incentivized with the introduction of agriculture related policies announced such as the application of Nano DAP on various crops to be expanded in all agro-climatic zones, 'atmanirbharta' for oilseeds.









### **Aerospace and Defense** | Key Highlights

- Budget allocation for the Ministry of Defense is INR621,540 crores, being the highest among all ministries.
- Allocation of INR172,000 crores for capital outlay and INR282,772 crores for revenue expenditure earmarked.
- > 5.78% and 4.68% increase in INR terms in budgetary allocation for capital outlay and revenue expenditure, respectively, over FY 2023-24 (BE).
- New scheme to be launched for strengthening deep-tech technologies for defense purposes and for expediting self-reliance in the defense sector.
- Sunset clause extended from 31 March 2024 to 31 March 2025 for following tax exemptions linked to commencement of operations by IFSC units engaged in leasing of aircraft.
  - ► Tax exemption on royalty and interest income received by a non-resident from an IFSC unit on account of lease of aircraft
  - ► Tax holiday on gains arising on sale of leased aircraft by IFSC unit, within the tax holiday period
- With 149 current airports, the Government aims to continue its push for expansion of existing airports in the country and development of new airports expeditiously, with a strong vision to boost air connectivity to Tier-II and Tier-III cities





5.78% increase in capital outlay allocation and 4.68% in revenue expenditure allocation

New scheme to be launched to strengthen deep-tech technologies for defense purposes





Sunset clause for tax exemptions linked to commencement of operations by IFSC entity extended to 31 March 2025







# Financial Services (1/2) | Key Highlights

	Section of Income Tax Act, 1961	Applicable to	Deduction/benefit available	Sunset clause extension
	10(4D)	Investment division of non-resident IFSC Banking Unit (IBU)	Income from foreign securities, capital gains from Indian securities (other than equity shares), capital gains from securities listed on IFSC exchanges, business income from securitization trust.	The sunset clause for commencement of investment operations by such IBUs has been extended from 31 March 2024 to 31 March 2025
	10(23FE)	Wholly owned subsidiary of Abu Dhabi Investment Authority (ADIA), Sovereign Wealth Fund, Pension Fund (satisfying prescribed conditions)	Income from dividend, interest, specified income (for units of business trust) or longterm capital gains arising from investment in debt, shares or units of specified entities in India	The sunset clause for making the investment in debt, shares or units in India has been extended from 31 March 2024 to 31 March 2025









# Financial Services (2/2) | Key Highlights

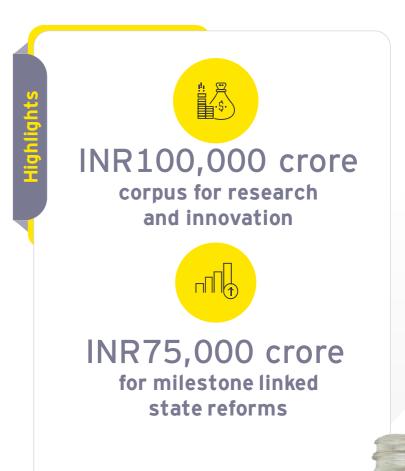
Section of Income Tax Act, 1961	Applicable to	Deduction/benefit available	Sunset clause extension
10(4F)	Non-residents leasing aircraft/ship to IFSC unit	Royalty and interest income of a non-resident paid by an IFSC unit on account of lease of aircraft or ship is exempt from tax.	The sunset clause for commencement of operations of IFSC unit engaged in aircraft or ship leasing has been extended from 31 March 2024 to 31 March 2025
80LA	Aircraft / ship leasing companies in IFSC	Income arising from transfer of a leased aircraft or ship by an IFSC unit within the tax holiday period is exempt from tax	The sunset clause for commencement of operations of IFSC unit engaged in aircraft or ship leasing has been extended from 31 March 2024 to 31 March 2025

- ▶ To encourage the private sector to scale up research and innovation, a corpus of INR one lakh crore is to be established with 50-year interest free loan. The corpus will provide long-term financing or refinancing with long tenors at low or NIL interest rates.
- Provision of INR75,000 crore as 50-year interest free loan to support milestone-linked reforms by the State Governments.









### **Infrastructure** | Key Highlights

- ▶ Implementation of three major economic railway corridor programs:
  - Energy, mineral, and cement corridor
  - Port connectivity corridor
  - High traffic density corridor
- Expansion of Metro Rail and NaMo Bharat to be supported in large cities, focusing on transit-oriented development.
- Expansion of existing airports and development of new airports to continue expeditiously.
- > Projects relating to port connectivity to be undertaken on islands, including Lakshadweep.
- > Royalty or interest received by a non-resident from IFSC ship or aircraft leasing units on account of leasing of ship(s) or aircraft(s), is exempt from tax subject to the condition of commencement of operations by such IFSC unit by 31 March 2024. This date has been extended to 31 March 2025.
- ▶ Income arising from transfer of ship(s) or aircraft(s) by IFSC ship or aircraft leasing unit is eligible for tax holiday subject to the condition of commencement of operations by such IFSC unit by 31 March 2024. This date has also been extended to 31 March 2025.
- ▶ Investment window for eligible investments by Sovereign Wealth Fund, Pension Fund, wholly owned subsidiary of Abu Dhabi Investment Authority, extended from 31 March 2024 to 31 March 2025 for claiming exemption on certain income from such investments.





Total Capex outlay increased by 11.1% to approx. INR11.11 lakh crores; major outlay for roads INR2.72 lakh crore and railways INR2.52 lakh crore









### Pharma and Lifesciences | Key Highlights

- Encouragement provided for vaccination against cervical cancer of girls in the age group of 9 to 14 years for the prevention of the disease.
- ▶ Health cover under the Ayushman Bharat scheme to be extended to all ASHA workers and Anganwadi workers and helpers.
- More medical colleges are to be set up by utilizing the existing hospital infrastructure under various departments. A committee for this purpose to be set up to examine the issues and make relevant recommendations.
- > All maternal and child healthcare schemes to be brought under one comprehensive program for synergy in implementation.
- Upgradation of Anganwadi centers under Saksham Anganwadi and Poshan 2.0 to be expedited to improve nutrition delivery, early childhood care, and development.
- Newly designed 'U-Win' platform for managing immunization and intensification of Mission Indradhanush to be rolled expeditiously throughout the country.
- Focus on research and innovation received a further boost by announcing INR one lakh crore corpus for providing loan at low or nil interest for a long duration for research and innovation in the private sector. It is expected that it may include the pharma sector.



Focus on expanding the healthcare ecosystem



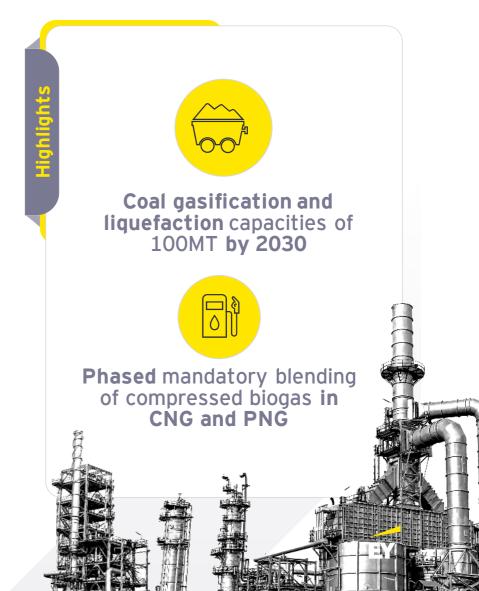
Expectation to include the pharma sector in the corpus announced to boost research innovation





# Oil and Gas | Key Highlights

- Emphasized focus on sustaining high and more resource-efficient economic growth and driving towards energy security in terms of availability, accessibility, and affordability.
- ▶ Towards meeting the net zero target by 2070, the following measures to be taken:
  - ▶ Setting up coal gasification and liquefaction capacities of 100 MT by 2030.
  - ▶ Phased mandatory blending of compressed biogas in Compressed Natural Gas (CNG) for transport and Piped Natural Gas (PNG) for domestic purposes.
  - ► Financial assistance for procurement of biomass aggregation machinery to support collection.
- ▶ Royalty or interest received by a non-resident from IFSC ship leasing units (which includes oil and gas vessels) on account of leasing of ship(s), is exempt from tax subject to the condition of commencement of operations by such IFSC unit by 31 March 2024. This date has been extended to 31 March 2025.
- ▶ Income arising from transfer of ship(s) by IFSC ship leasing unit is eligible for tax holiday subject to the condition of commencement of operations by such IFSC unit by 31 March 2024. This date has also been extended to 31 March 2025.
- ▶ No change in customs duty rates pertaining to the sector.









### Real Estate | Key Highlights

- ► Housing scheme to be introduced for middle income class who are currently renting premises to enable them to buy or build their own houses.
- ▶ In consonance with its objective of 'Housing for All', an additional 2 crore houses to be built in the next five years under the Pradhan Mantri Awas Yojana (Grameen).









### **Startup** | Key Highlights

- Extension of time-limit from 31 March 2024 to 31 March 2025 for incorporation of eligible start-ups for claiming profit linked tax deduction under Section 80-IAC.
- Investment window for eligible investments by Sovereign Wealth Fund, Pension Fund, wholly owned subsidiary of Abu Dhabi Investment Authority, extended from 31 March 2024 to 31 March 2025 for claiming exemption on certain income from such investments.
- Despite being a budget with minimal amendments, the above provide a welcome relief to the start-up sector, indicating the government's continued support and faith. These measures are going to incentivize the start-up eco-system by providing ease of doing business and increasing free cash flows available for their growth and expansion.









# **Technology** | Key Highlights

- ► Allocation for Modified Programme for Development of Semiconductors and Display Manufacturing Ecosystem in India increased to INR6,903 crore.
- ► Allocation for Production Linked Incentive scheme for large-scale electronics manufacturing and IT hardware increased to INR6,200 crore.
- Establishment of INR1 lakh crores corpus to provide long-term financing/ re-financing with low/ nil interest rates to encourage innovation in sunrise domains.
- New scheme to be launched for strengthening deep-tech technologies for defense purposes.



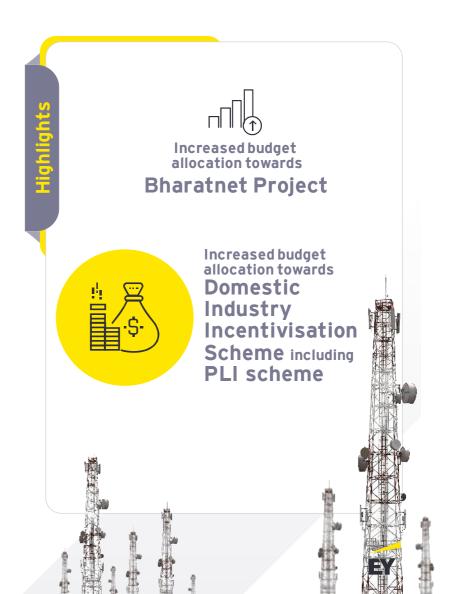






# Telecom | Key Highlights

- ► Increased budget allocation for capex from INR5,000 crore to INR8,500 crore towards Bharatnet Project which aims at creation of telecom infrastructure and connect all Gram Panchayats.
- ► Increased budgetary allocation towards Domestic Industry Incentivisation Scheme (including PLI scheme) from INR515 crore to INR1,911 crore.
- Increase of 28% in budget allocation towards capital infusion in BSNL for technology upgradation and restructuring. This shall translate into more opportunities for domestic manufacturers.
- ▶ Impetus on research and development, and domestic manufacturing are the two cornerstones for the telecom sector in this budget.



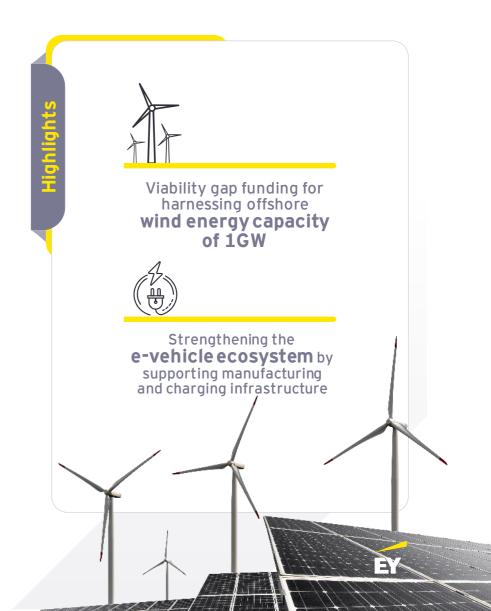






# **Energy** | Key Highlights

- ► The budget focuses on strengthening the e-vehicle ecosystem by supporting manufacturing and charging infrastructure; greater adoption of e-buses for public transport networks through payment security mechanism
- ► Through rooftop solarization, 1 crore households would be able to obtain up to 300 units of free electricity every month
- ► Viability gap funding will be provided for harnessing offshore wind energy potential for initial capacity of 1 giga watt ('GW')
- ► Coal gasification and liquefaction capacity of 100MT will be set up by 2030 to reduce import dependence
- ► Phased mandatory blending of compressed biogas in compressed natural gas for transport and piped natural gas for domestic purposes will be mandated
- ► Financial assistance for aggregation in procurement of biomass to bridge feedstock challenges for CBG units









### Our Offices

#### Ahmedabad

22nd Floor, B Wing, Privilon Ambli BRT Road, Behind Iskcon Temple, Off SG Highway Ahmedabad - 380 059 Tel: + 91 79 6608 3800

#### Bengaluru

12th & 13th floor "UB City", Canberra Block No.24 Vittal Mallya Road Bengaluru - 560 001 Tel: +91 80 6727 5000

Ground Floor, 'A' wing Divyasree Chambers # 11, Langford Gardens Bengaluru - 560 025 Tel: + 91 80 6727 5000

#### Chandigarh

Elante offices, Unit No. B-613 & 614 6th Floor, Plot No- 178-178A Industrial & Business Park, Phase-I Chandigarh - 160 002 Tel: +91 172 6717800

#### Chennai

Tidel Park, 6th & 7th Floor A Block, No.4, Rajiv Gandhi Salai Taramani, Chennai - 600 113 Tel: +91 44 6654 8100

#### Delhi NCR

Ground Floor 67, Institutional Area Sector 44, Gurugram - 122 003 Haryana Tel: +91 124 443 4000

3rd & 6th Floor, Worldmark-1 IGI Airport Hospitality District Aerocity, New Delhi - 110 037 Tel: +91 11 4731 8000

4th & 5th Floor, Plot No 2B Tower 2, Sector 126 Gautam Budh Nagar, U.P. Noida - 201 304 Tel: +91 120 671 7000

#### Hyderabad

THE SKYVIEW 10 18th Floor, "SOUTH LOBBY" Survey No 83/1, Raidurgam Hyderabad - 500 032 Tel: + 91 40 6736 2000

#### Jamshedpur

1st Floor, Fairdeal Complex Holding No. 7, SB Shop Area Bistupur, Jamshedpur - 831 001 East Singhbhum Jharkhand Tel: + 91 657 663 1000

#### Kochi

9th Floor, ABAD Nucleus NH-49, Maradu PO Kochi - 682 304 Tel: + 91 484 433 4000

#### Kolkata

22 Camac Street 3rd Floor, Block 'C' Kolkata - 700 016 Tel: + 91 33 6615 3400

#### Mumbai

14th Floor, The Ruby 29 Senapati Bapat Marg Dadar (W), Mumbai - 400 028 Tel: + 91 22 6192 0000

5th Floor, Block B-2 Nirlon Knowledge Park Off. Western Express Highway Goregaon (E) Mumbai - 400 063 Tel: + 91 22 6192 0000

#### Pune

C-401, 4th floor Panchshil Tech Park, Yerwada (Near Don Bosco School) Pune - 411 006 Tel: +91 20 4912 6000

#### Ernst & Young LLP

**EY** | Building a better working world

EY exists to build a better working world, helping to create long-term value for clients, people and society and build trust in the capital markets.

Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate.

Working across assurance, consulting, law, strategy, tax and transactions. EY teams ask better questions to find new answers for the complex issues facing our world today.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. Information about how EY collects and uses personal data and a description of the rights individuals have under data protection legislation are available via ey.com/privacy. EYG member firms do not practice law where prohibited by local laws. For more information about our organization, please visit ey.com.

Ernst & Young LLP is one of the Indian client serving member firms of EYGM Limited. For more information about our organization, please visit www.ey.com/en in.

Ernst & Young LLP is a Limited Liability Partnership, registered under the Limited Liability Partnership Act, 2008 in India, having its registered office at Ground Floor, Plot No. 67, Institutional Area, Sector - 44, Gurugram - 122003, Harvana, India.

© 2024 Ernst & Young LLP. Published in India. All Rights Reserved.

This publication contains information in summary form and is therefore intended for general guidance only. It is not intended to be a substitute for detailed research or the exercise of professional judgment. Neither EYGM Limited nor any other member of the global Ernst & Young organization can accept any responsibility for loss occasioned to any person acting or refraining from action as a result of any material in this publication. On any specific matter, reference should be made to the appropriate advisor.

#### ey.com/en in











# Building a better working world