

**Government of India
Ministry of Finance
Department of Revenue
Central Board of Direct Taxes**

New Delhi, the 25th March, 2025

PRESS RELEASE

CBDT notifies amendments in Income-tax Rules, 1962 to expand the scope of safe harbour rules

Section 92CB of the Income-tax Act, 1961 inter alia, empowers the CBDT to make safe harbour rules, for the determination of arm's length price under section 92C or section 92CA. The scope of the safe harbour rules has been expanded by:-

- (a) Increasing the threshold for availing safe harbour from Rs. 200 Crores to Rs. 300 Crores;
- (b) Including the "lithium ion batteries for use in electric or hybrid electric vehicles" in the definition of core auto components.

To provide tax certainty to the assessees opting for safe harbour, the amendments are applicable to two assessment years 2025-26 and 2026-27.

CBDT Notification No. 21/2025 dated 25.03.2025 has been published in <https://egazette.gov.in/>.

(V. Rajitha)
Commissioner of Income Tax
(Media & Technical Policy)
Official Spokesperson, CBDT

MINISTRY OF FINANCE
(Department of Revenue)
(CENTRAL BOARD OF DIRECT TAXES)

NOTIFICATION

New Delhi, the 25th March, 2025

No. 21/2025

INCOME-TAX

G.S.R. 193(E).—In exercise of the powers conferred by section 295 read with sub-section (2) of section 92CB of the Income-tax Act, 1961 (43 of 1961), the Central Board of Direct Taxes hereby makes the following rules further to amend the Income-tax Rules, 1962, namely:—

1. (1) These rules may be called the Income-tax (Sixth Amendment) Rules, 2025.
(2) They shall come into force on the date of their publication in the Official Gazette.
2. In the Income-tax Rules, 1962,—
 - (a) in rule 10TA, in clause (b),—
 - I. in sub-clause (iii), at the end, the word “or” shall be inserted;
 - II. after sub-clause (iii), the following sub-clause shall be inserted, namely:—
“(iv) lithium ion batteries for use in electric or hybrid electric vehicles.”;
 - (b) in rule 10TD,—
 - I. in sub-rule (2A), in the Table,—
 - (A) in Sl.No. 1, in column number (3), in clause (ii), for the word “two”, the word “three” shall be substituted;
 - (B) in Sl.No. 2, in column number (3), in clause (ii), for the word “two”, the word “three” shall be substituted;
 - (C) in Sl.No. 3, in column number (3), in the opening portion, for the word “two”, the word “three” shall be substituted;
 - (D) in Sl.No. 7, in column number (3), for the word “two”, the word “three” shall be substituted;
 - (E) in Sl.No. 8, in column number (3), for the word “two”, the word “three” shall be substituted;
 - II. in sub-rule (3B), for the words and figures “assessment years 2020-21, 2021-22, 2022-23, 2023-24 and 2024-25”, the words and figures “assessment years 2020-21, 2021-22, 2022-23, 2023-24, 2024-25, 2025-26 and 2026-27” shall be substituted;
 - (c) in rule 10TE, in sub-rule (2), in the fourth proviso, after the word, figures and letters “rule 10TD”, the words “for one assessment year” shall be inserted.

[F. No. 370142/6/2025-TPL]

THAKUR SINGH MAPWAL, Director

Note : The principal rules were published in the Gazette of India, Extraordinary, Part-II, section 3, sub-section (ii) *vide* number S.O. 969 (E) dated the 26th March, 1962 and were last amended *vide* notification number G.S.R. 145(E) dated the 24th February, 2025.