

## EXEMPTIONS

### Health/Clinical Establishment related services

- A. **Health care services:** Health care services provided by a clinical establishment, an authorized medical practitioner or para-medics are exempt.  
**Includes** services by way of transportation of the patient to and from a clinical establishment, **Does not include** hair transplant or cosmetic or plastic surgery, **except** when undertaken to rest or to reconstruct anatomy or functions of body affected due to congenital defects, developmental abnormalities, injury or trauma.
- B. **Ambulance service :**
- C. **Veterinary services**
- D. **Stem cell banking services:** Services provided by cord blood banks by way of preservation of stem cells or any other service in relation to such preservation are exempt from GST
- E. **Common bio-medical waste treatment:** Services provided by operators of the common bio-medical waste treatment facility to a clinical establishment by way of treatment or disposal of bio-medical waste or the processes incidental thereto are exempt from GST

Rent of rooms provided to in-patients in hospitals is **exempt**

#### **Services provided by senior doctors/ consultants/ technicians**

Hospitals hire senior doctors/ consultants/ technicians independently. Such persons do not have any contract with the patient. Hospitals pay them consultancy charges and there is no employer-employee relationship between them.

It is clarified by CBIC that services provided by such senior doctors/ consultants/ technicians, whether employees or not, are healthcare services which are **exempt from GST**



#### **Amount charged by hospitals from the patient**

**The entire amount** charged by them from the patients including the retention money and the fee/payments made to the doctors etc., is towards the healthcare services provided by the hospitals to the patients and is exempt

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### Food supplied to the patients

Health care services provided by the clinical establishments will include food supplied to the patients; but such food may be prepared by the canteens run by the hospitals or may be outsourced by the hospitals from outdoor caterers.

When outsourced, there is no ambiguity that the suppliers shall charge tax as applicable and hospital will get no ITC.

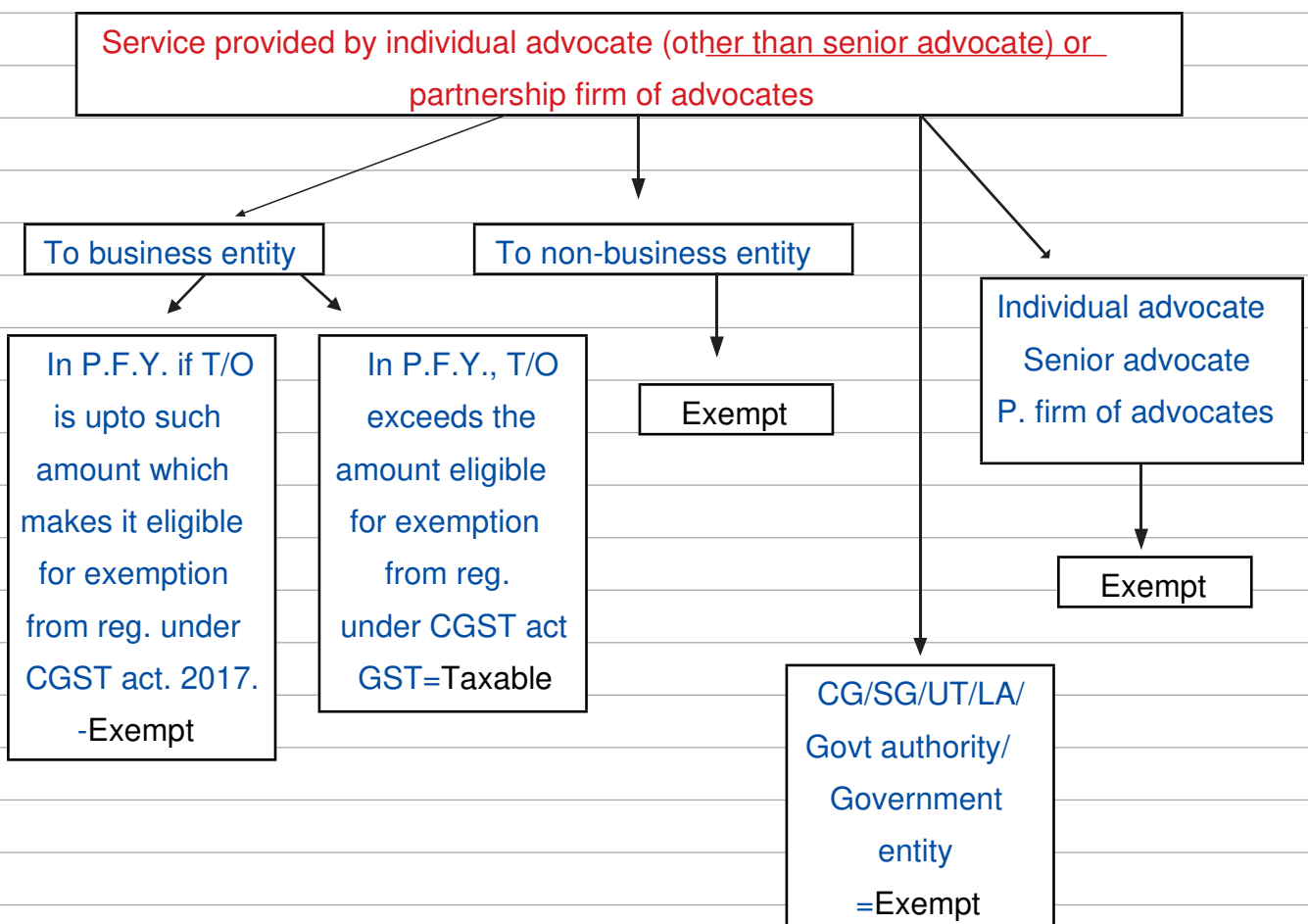
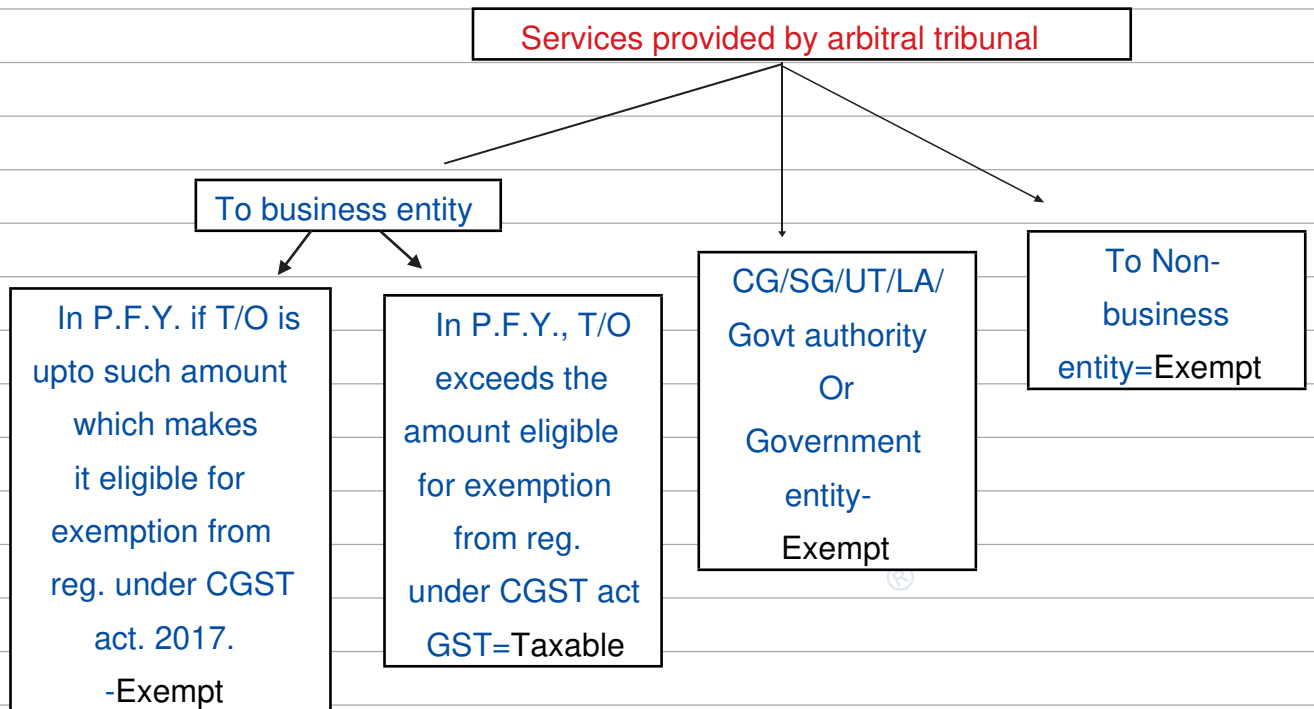
If hospitals have their own canteens and prepare their own food; then no ITC will be available on inputs including capital goods and in turn if they supply food to the doctors and their staff; such supplies, even when not charged, may be subjected to GST.

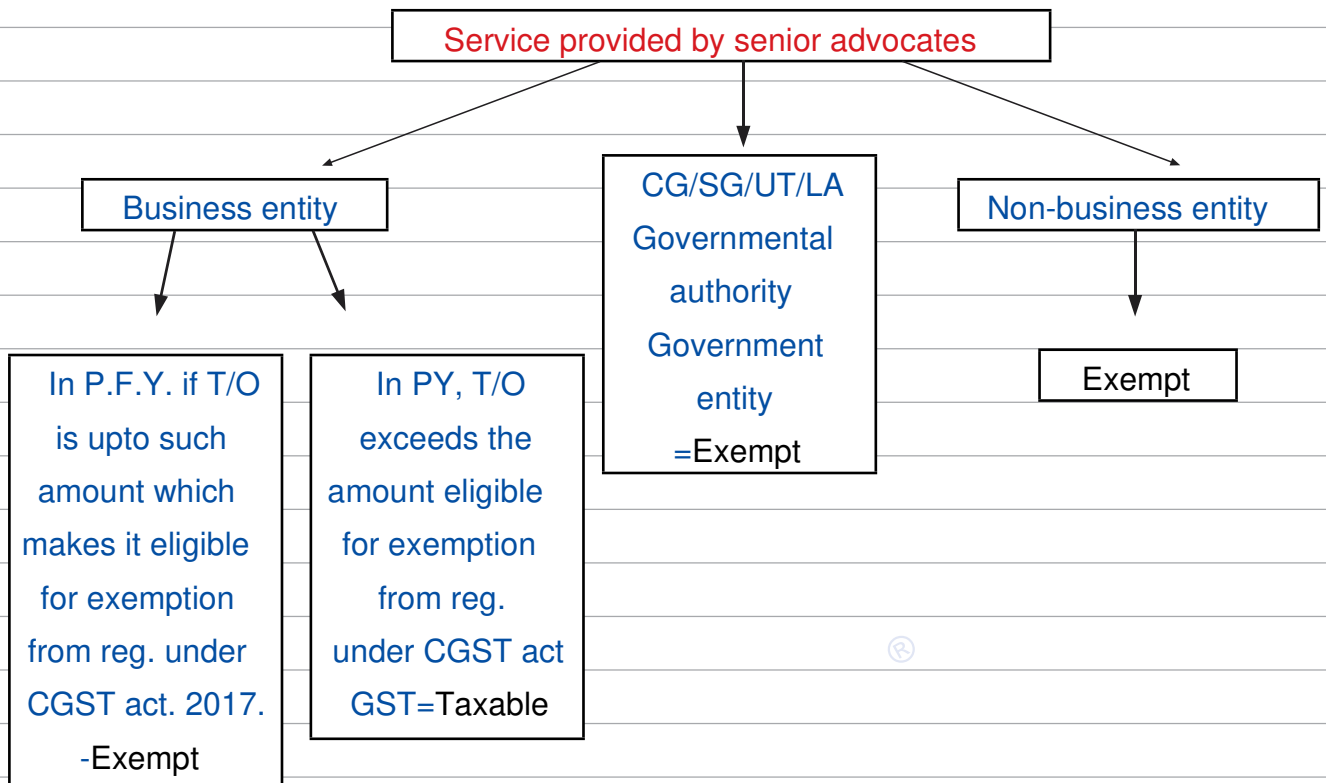
Food supplied to the in-patients as advised by the doctor/nutritionists is a part of composite supply of healthcare and not separately taxable.

Other supplies of food by a hospital to patients (not admitted) or their attendants or visitors are taxable.

Supply of services other than healthcare services such as renting of shops, auditoriums in the premises of the clinical establishment, display of advertisements etc. will be subject to GST

## Legal services





### Service provided to recognized sports body

Service provided by player, referee, umpire, coach, team manager

To recognized sports body is **exempt**

Commentators, Selectors, Technical experts, Curator providing service to RSB shall be **taxable**

**Recognized sports body (RSB) means –**

- (i) Indian Olympic Association
- (ii) Sports Authority of India
- (iii) A national sports federation recognised by the Ministry of Sports and Youth Affairs of the Central Government, and its affiliate federations
- (iv) National sports promotion organisations recognised by the Ministry of Sports and Youth Affairs of the Central Government
- (v) International Olympic Association or a federation recognised by the International Olympic Association, or
- (vi) A federation or a body which regulates a sport at international level and its affiliated federations or bodies regulating a sport in India.

## SERVICES PROVIDED BY AND TO FIFA AND ITS SUBSIDIARIES DIRECTLY OR INDIRECTLY

Related to any of the events under FIFA U-17 women's cup 2020 to be hosted in India

### CONDITIONS TO BE FULFILLED:

Director(sports) & Ministry of youth affairs and sports have to certify that the services are directly or indirectly related to any of the events under FIFA U-17 Women's World Cup, 2020.

Services by way of right to admission to the events organised under FIFA U-17 Women's World Cup, 2020.

### Services by an artist by way of a performance in folk or classical art forms of

- (i) music, or
- (ii) dance, or
- (iii) theatre

are exempt from GST, if the consideration charged for such performance is not more than 1,50,000

(Note- service provided by such artist as a brand ambassador is subject to GST)

Services by a hotel, inn, guest house, club or campsite, by whatever name called, for residential or lodging purposes, having value of supply of a unit of accommodation is below or equal to 1,000/day or equivalent.

### Services by way of giving on hire –

- (a) to a state transport undertaking, a motor vehicle meant to carry more than 12 passengers

(aa) to a local authority, an electrically operated vehicle (EOV) meant to carry more than 12 passengers;

- (b) to a goods transport agency, a means of transportation of are exempt

- (c) motor vehicle for transport of students, faculty and staff, to a person providing services of transportation of students, faculty and staff to an educational institution providing services by way of pre-school education and education upto higher secondary school or equivalent

### Services provided by the Reserve Bank of India

Any service provided by the Reserve Bank of India to any person is not liable to GST

Any services provided to RBI from outside India in the course of management of foreign exchange reserves (Eg-external asset management, custodial services, securities lending services, etc).

**Note :** Any other Services provided to RBI would be taxable

### Admission to entertainment events

- a) circus, dance, or theatrical performance including drama or ballet;
- b) award function, concert, pageant, musical performance or any sporting event other than a recognised sporting event,
- c) recognised sporting event;
- d) planetarium,

where the consideration for right to admission to the events or places as referred to in items (a), (b), (c) or (d) above is **not more than 500 per person**.

Services by way of admission to a museum, zoo, national park, wild life sanctuary and a tiger reserve are exempt from GST.

**ENTRY 79A** - Services by way of admission to a protected monument so declared under the Ancient Monuments and Archaeological Sites and remains Act 1958 or any of the States Acts, for the time being in force.

## Service in relation to education

**Educational institution** means an institution providing services by way of,-

- (a) pre-school education and education up to higher secondary school or equivalent;
- (b) education as a part of a curriculum for obtaining a qualification recognised by any law for the time being in force; including IIM\*

**Note :** A qualification recognised by any law for time being in force means any law enacted in India and not any foreign law. Therefore, let's say if ICAI imparts education services in relation to Certified Public Accountant (CPA) (US), in that case it will be considered that such service is outside the ambit of this exemption as ICAI is teaching a course not recognised by Indian law.

- (c) education as a part of an approved vocational education course

\*\* IIMs provide various long duration programs (1 year or more) for which they award diploma/ degree certificate duly recommended by Board of Governors as per the power vested in them under the IIM Act, 2017. Therefore, it is clarified that services provided by Indian Institutes of Managements to their students- in all such long duration programs (one year or more) are exempt from levy of GST.

\*\* IIMs also provide various short duration/ short term programs (less than 1 year) for which they award participation certificate to the executives/ professionals as they are considered as "participants" of the said programmes. These participation certificates are not any qualification recognized by law. Such participants are also not considered as students of IIM. Services provided by IIMs as an educational institution to such participants is not exempt from GST. Such short duration executive programs attract standard rate of GST @ 18% (CGST 9% + SGST 9%) [Circular No. 82/01/2019 GST dated 01.01.2019].

## Entry 66

Services provided -

- (a) by an educational institution to its students, faculty and staff;
  - (aa) by an educational institution by way of conduct of entrance examination against consideration in the form of entrance fee;
- (b) to an educational institution, by way of,-
  - (i) transportation of students, faculty and staff;
  - (ii) catering, including any mid-day meals scheme sponsored by the Central Government, State Government or Union territory;
  - (iii) security or cleaning or house-keeping services performed in such educational institution;
  - (iv) services relating to admission to, or conduct of examination by, such institution;
  - (v) supply of online educational journals or periodicals.

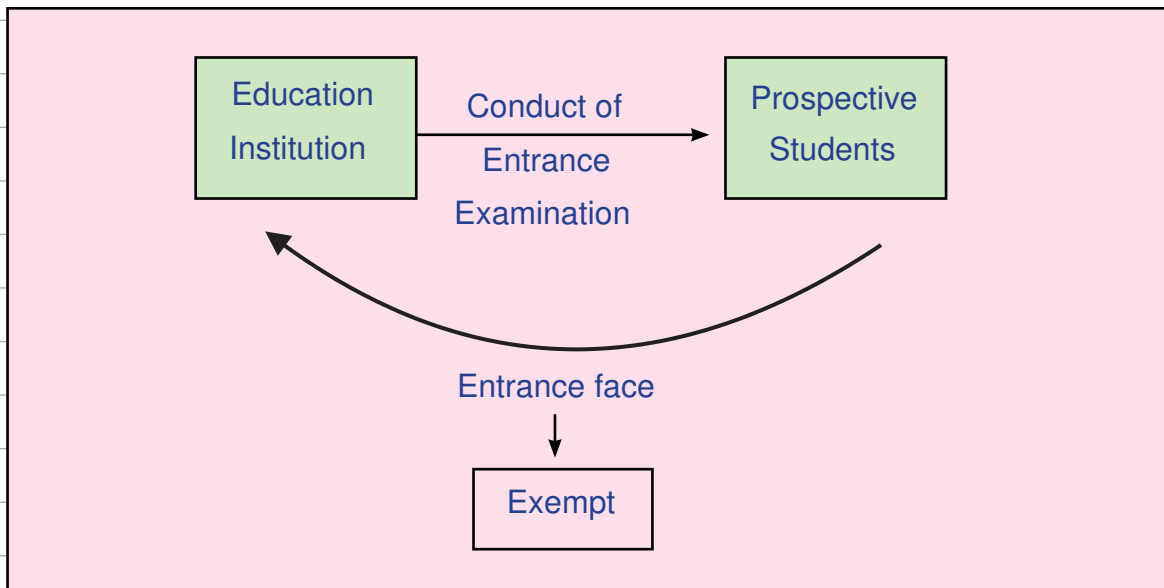
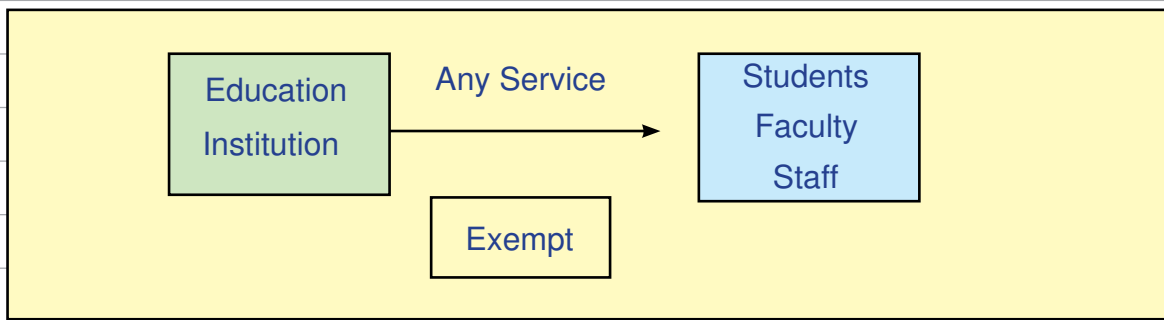
However, nothing contained in sub-items (i), (ii) and (iii) of item (b) shall apply to an educational institution other than an institution providing services by way of pre-school education and education up to higher secondary school or equivalent.

Further, nothing contained in sub-item (v) of item (b) shall apply to an institution providing services by way of,-

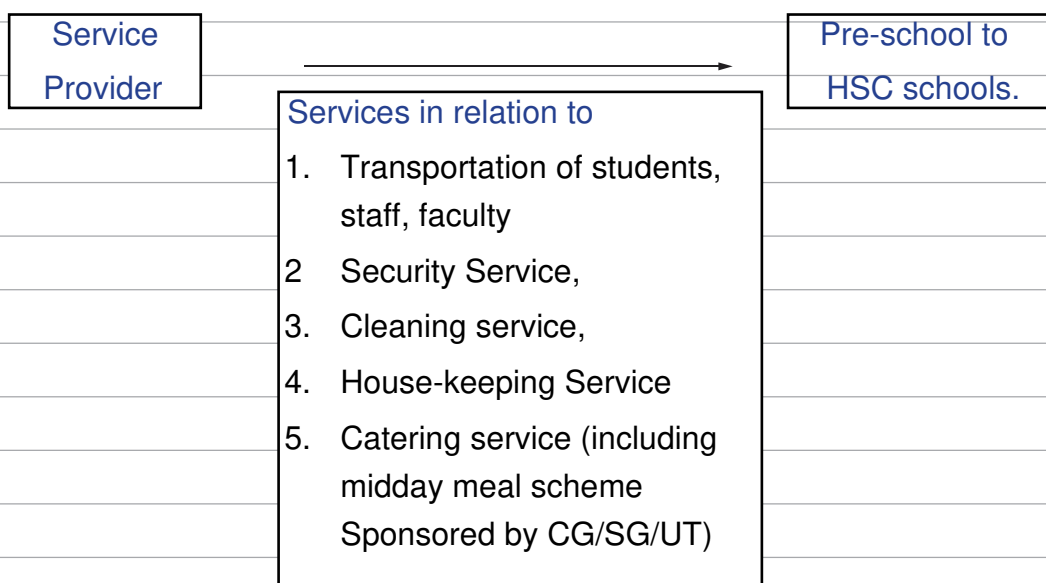
- (i) pre-school education and education up to higher secondary school or equivalent; or
- (ii) education as a part of an approved vocational education course.

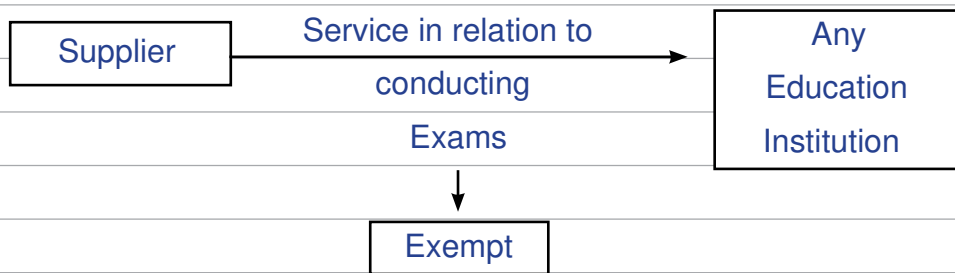


## Services provided by an Education institution to Students, Faculty and Staff



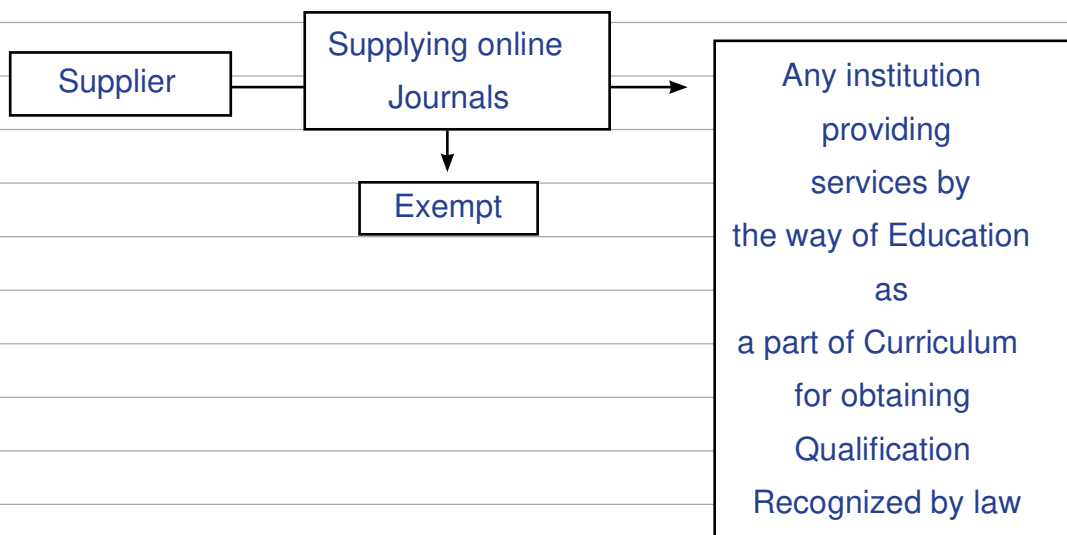
## Services provided to Education institution





### Service provided to Education Institution by way of online educational journals

Service provided to education institution where education as a part of a curriculum for obtaining a qualification recognized by any law for time being in force by the way of supply of online educational journals or periodicals.



### Private ITIs

Private ITIs qualify as an educational institution if the education provided by these ITIs is approved as vocational educational course as defined above. It implies that services provided by a private ITI only in respect of designated trades notified under Apprenticeship Act, 1961 are exempt from GST under Entry 66. Services in other than designated trades are liable to GST

### Government ITIs

As far as Government ITIs are concerned, services provided by a Government ITI to individual trainees/ students, are exempt under Entry 6 as these are in the nature of services provided by the Central or State Government to individuals [Entry 6 is discussed in detail subsequently]. Such exemption in relation to services provided by Government ITI would cover both - vocational training and examinations conducted by these Government ITIs [Circular No. 55/29/2018 GST dated 09.08.2018].

### Unrecognized educational institutions

Private coaching centres or other unrecognized institutions, though selfstyled as educational institutions, would not be treated as educational institutions under GST and thus cannot avail exemptions available to an educational institution.

### Analysis :

- Private coaching Institution do not fall under the definition of educational institution and hence they fall outside the ambit of exemption.

**Boarding schools** provide service of education coupled with other services like providing dwelling units for residence and food. This may be a case of composite supply if the charges for education and lodging and boarding are inseparable. Their taxability will be determined in terms of the principles laid down in section 2(30) read with section 8 of the CGST Act, 2017.

Such services in the case of boarding schools are naturally bundled and supplied in the ordinary course of business. Therefore, the bundle of services will be treated as consisting entirely of the principal supply, which means the service which forms the predominant element of such a bundle.

In this case since the predominant nature is determined by the service of education, the other service of providing residential dwelling will not be considered for the purpose of determining the tax liability and in this case the **entire consideration for the supply will be exempt.**

### Supply of food in a mess or canteen

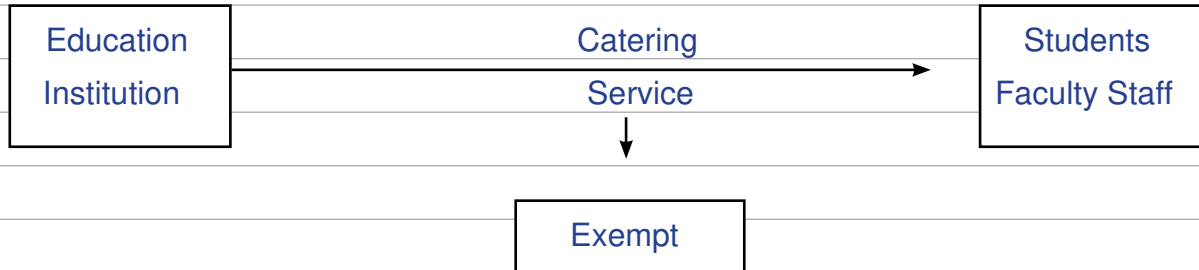
Educational institutions generally have mess facility for providing food to their students and staff. Such facility is (i) either run by the institution/ students themselves or (ii) is outsourced to a third person.

If the catering services is one of the services provided by an educational institution to its students, faculty and staff and the said educational institution is covered by the definition of 'educational institution' as given above, then the same is exempt. [covered under item (a) of entry 66 of the Notification].

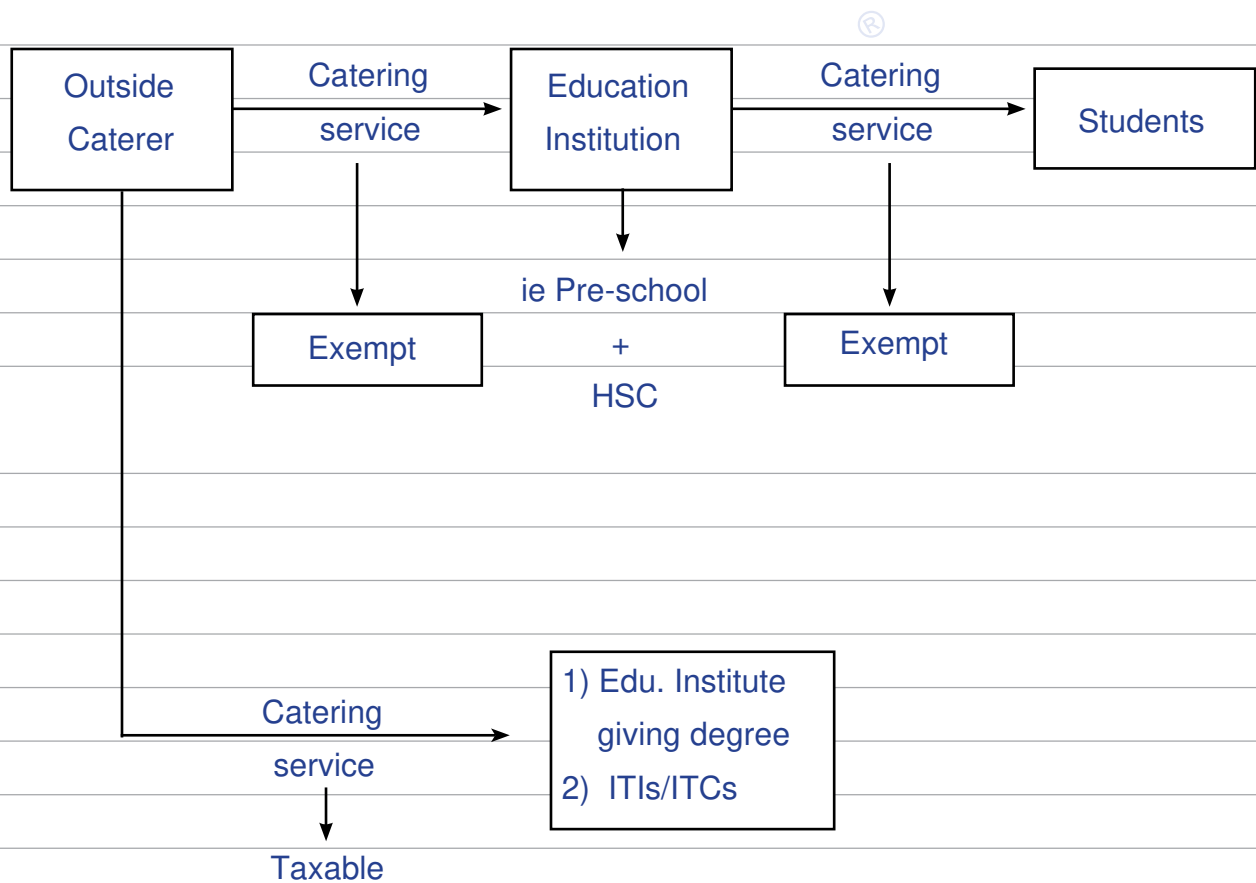
If the catering services, i.e., supply of food or drink in a mess or canteen, is provided by anyone other than the educational institution, i.e. the institution outsources the catering activity to an outside contractor, then it is a supply of service to the concerned educational institution by such outside caterer and attracts GST \*\*

**\*\*Note:** It may be noted that said services when provided to an educational institution providing pre-school education or education up to higher secondary school or equivalent are exempt from tax.

## Supply of Food



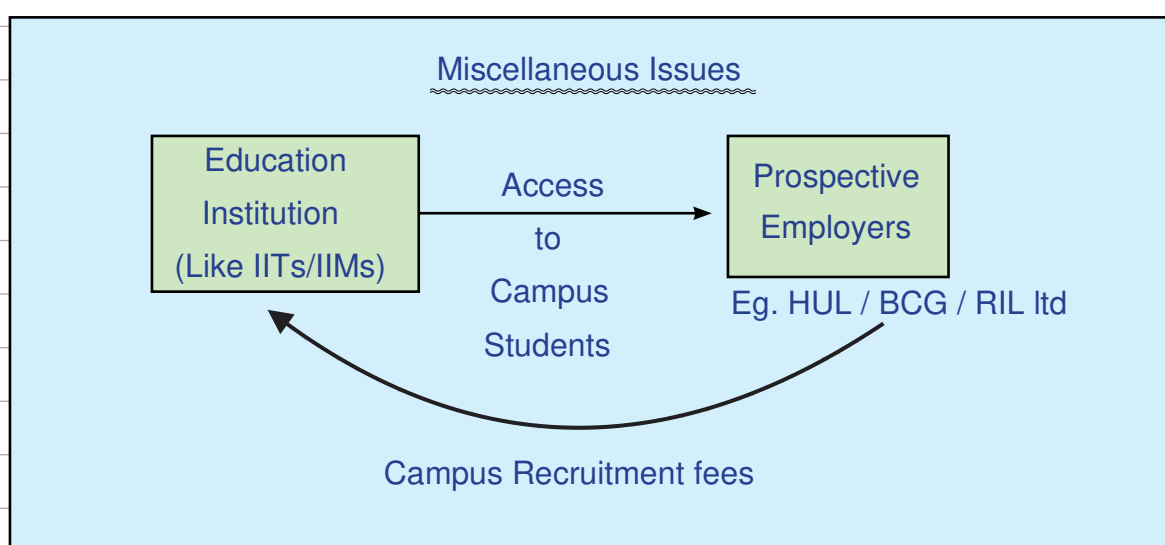
(Since any service provided by education to students)  
Institution



- All other Services provided to such institution are liable to GST.

### Fees charged from prospective employers

Educational institutes such as IITs, IIMs charge a fee from prospective employers like corporate houses/MNCs, who come to the institutes for recruiting candidates through campus interviews in relation to campus recruitments. Such services shall also be liable to tax



### Services by way of training or coaching in recreational activities relating to-

- (a) arts or
- (b) culture, or
- (c) sports

by charitable entities registered under section 12AA of the Income-tax Act.

### Certain services provided in financial sector

Services by way of—

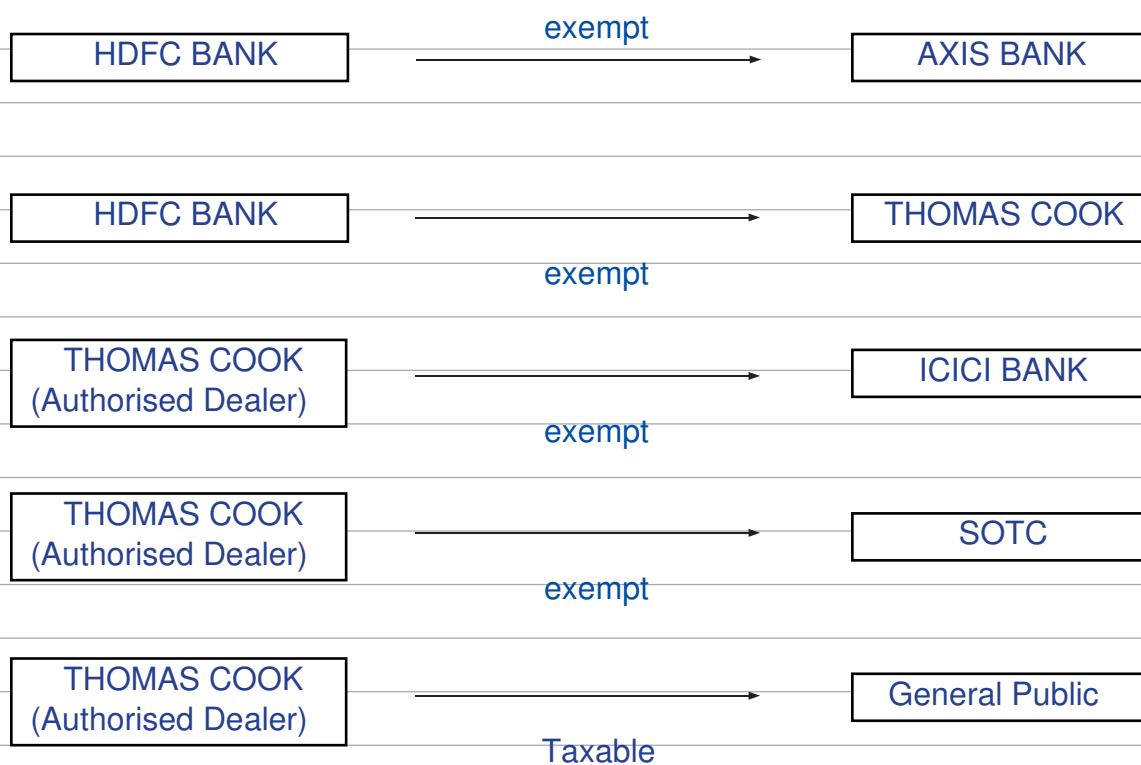
extending deposits, loans or advances in so far as the consideration is represented by way of interest or discount;

**Note**-Any service charges or administrative charges or management fees collected over and above interest on loan, advance, deposit are taxable. inter se sale or purchase of foreign currency amongst banks or authorized dealers of foreign exchange or amongst banks and such dealer

### CHARGES FOR LATE PAYMENT OF OUTSTANDING DUES ON CREDIT CARD.

Interest charged on outstanding credit card balances has been specifically excluded from Entry 27. Hence, the same is liable to GST.

→ These shall be liable to GST.



Services relating to agriculture and agricultural produce.

Agriculture includes cultivation of plants, crops and rearing of all life forms

Except the rearing of horses For food, fibre, fuel, raw material, other products

Services relating to agriculture or agricultural produce by way of—



- (i) agricultural Operations directly related to production of any agricultural produce including cultivation, harvesting, threshing, plant protection or testing;
- (ii) supply of farm labour;
- (iii) processes carried out at an agricultural farm including tending, pruning, cutting, harvesting, drying, cleaning, trimming, fumigating, curing, sorting, grading, cooling or bulk packaging and such like operations which do not change essential characteristics of agricultural produce but make it only marketable for the primary market;
- (iv) renting or leasing of agro machinery or vacant land with or without a structure incidental to its use
- (v) loading, unloading, packing, storage or warehousing of agricultural (& not a product made out of agriculture produce)

Note-Services by way of loading, unloading, packing, storage or warehousing of rice is exempt

## ENTRY 24B

Services by way of storage/warehousing of cereals, pulses, fruits, nuts and vegetables, spices, copra, sugarcane, jaggery, raw vegetables fibres such as cotton, flax, jute, etc., indigo, un manufactured tobacco, betel leaves, tendu leaves, coffee and tea. Here, tea & coffee meals the end products that we directly consume.



VII. services by any Agricultural Produce Marketing Committee or Board is exempt

VIII. services provided by a commission agent for sale or purchase of agricultural produce (&not a product made out of agriculture produce)

IX. Exemption to Services by way of pre -conditioning, pre-oling,ripening,waxing, retail packing, labeling of fruits and vegetable. ®

X. Services by the way of fumigation in a warehouse of agricultural produce

XI. Services by the way of warehousing of minor forest produce

XII. Services by the way of artificial insemination of livestock(other than horses)

XIII. Carrying out an intermediate production process as job work in relation to cultivation of plants and rearing of all life forms of animals, except the rearing of horses, for food, fibre, fuel, raw material or other similar products or agricultural produce.

Clarification Regarding warehousing of agricultural produce. In this regard, following may be noted:

### Processed Tea and coffee



Tea used for making the beverage, such as black tea, green tea, white tea is a processed product made in tea factories after carrying out several processes, such as drying, rolling, shaping, refining, oxidation, packing etc. on green leaf



and is the processed output of the same. Thus, green tea leaves and not tea is the “agricultural produce” eligible for exemption available for loading, unloading, packing, storage or warehousing of agricultural produce. Same is the case with coffee obtained after processing of coffee beans.

### Jaggery



Similarly, processing of sugarcane into jaggery changes its essential characteristics. Thus, jaggery is also not an agricultural produce.



### Pulses

Pulses commonly known as dal are obtained after dehusking or splitting or both. The process of dehusking or splitting is usually not carried out by farmers or at farm level but by the pulse millers. Therefore pulses (dehusked or split) are also not agricultural produce. However, whole pulse grains such as whole gram, rajma etc. are covered in the definition of agricultural produce.



In view of the above, it is inferred that processed products such as tea (i.e. black tea, white tea etc.), processed coffee beans or powder, pulses (dehusked or split), jaggery, processed spices, processed dry fruits, processed cashew nuts etc. fall outside the definition of agricultural produce and therefore the exemption from GST is not available to their loading, packing, warehousing etc. [Circular No. 16/16/2017 GST dated 15.11.2017].

## Transportation of passengers

Road	Rail	Air	Water
Rickshaws-exempt	Local Train-	Transportation of passenger through	Inland waterways-
Metered Taxis-exempt	Second class-exempt	Air Except	i) Arabian sea,taxable
Radio Taxis-taxable	First class - taxable	Transportation of passenger through Air To/from	ii) Ganga river,exempt
Bus-	Outstation Train-	Northeast India or Bagdogra (WB)	Public transport not predominantly used for the purpose of tourism
Stage carriage-	General,Sleeper-exempt		=Exempt
A/c -taxable	A/c -Taxable		
Non A/c-exempt			
Contract Carriage-	Metro rail,Monorail, Tramway		
A/c-Taxable	=Exempt		
Non A/c-			
For the purpose of Hire,Tourism,Charter			
=Taxable			
Not For the purpose of Hire,Tourism,Charter			
=Exempt			

### Transportation of passengers

Air	Road	Rail	Water
All cases are taxable	All cases are Exempt	All cases are taxable	All cases are taxable
Except	Except		Except
Transportation of goods through air from a place outside India to a customs station clearance in India	GTA, Courier agency.		Inland waterways

Transportation of the following goods by rail / vessel / goods carriage is exempt from GST

- (a) Agricultural produce
- (b) milk, salt and food grain including flours, pulses and rice
- (c) chemical fertilizer, oil cakes and organic manure
- (d) newspaper or magazines registered with the Registrar of Newspapers
- (e) relief materials meant for victims of natural or man-made disasters, calamities, accidents or mishap
- (f) defence or military equipments

Transportation of the following goods by rail / vessel is exempt from GST

- (a) Railway equipments or materials

Transportation of the following goods in a goods carriage by a goods transport agency is exempt from GST.

- (i) goods where gross amount charged for the transportation of goods on a consignment transported in a single goods carriage does not exceed 1500
- (ii) goods, where gross amount charged for transportation of all such goods for a single consignee does not exceed 750.

Services provided by a goods transport agency, by way of transport of goods in a goods carriage to -

- a. Department or Establishment of the Central/State Government/Union territory; or
- b. local authority; or
- c. Governmental agencies which has taken GST registration only for the purpose of deducting tax under section 51 and not for making a taxable supply of goods or services

### Government services

Entry 6 - Services provided by CG/SG/UT/LA are exempt

Except

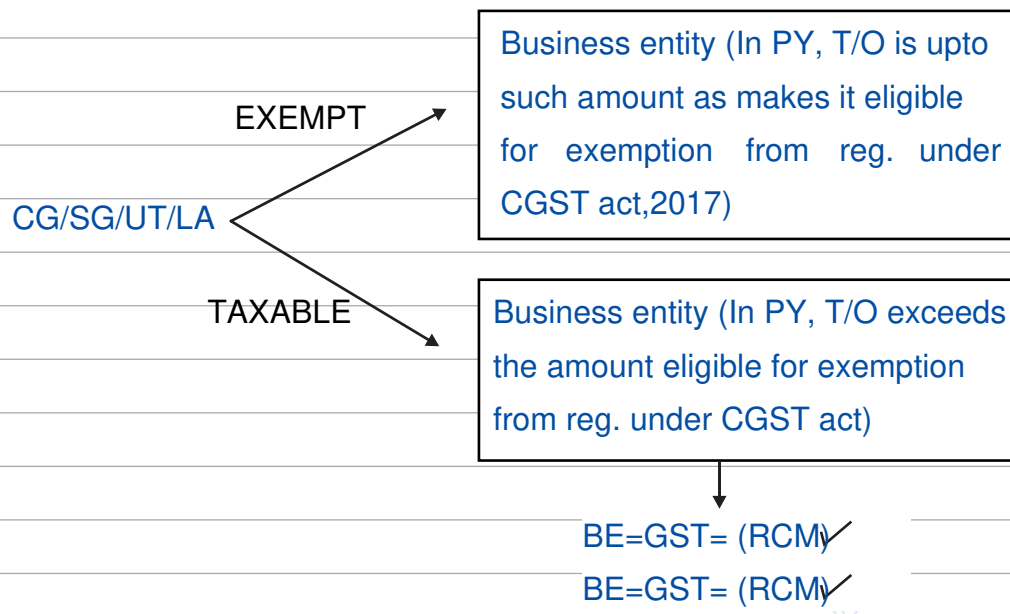
- 1. Services provided by department of post (CG) TO any person other than CG/SG/UT by the way of

- speed post
- express parcel post
- life insurance service
- agency service

**Note :** services like basic mail service, operating savings ac, pension payments not covered under the exception and hence are exempt

- 2. Service in reference to aircraft/vessel inside or outside the precincts of port or airport.
- 3. Transportation of passengers and goods.
- 4. Service provided to business entity.

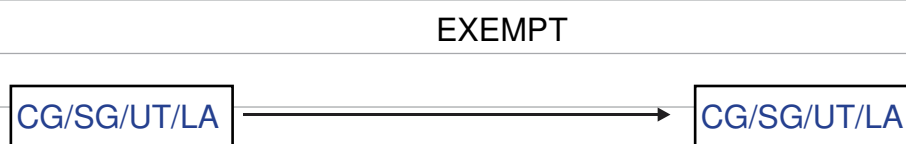
### Entry 7-



Above exemption is not applicable to:

1. Services provided by department of post.....
2. Services provided i.r.t aircraft/vessel.....
3. Transportation of passengers and goods
4. Renting of immovable property to a registered person is as per RCM

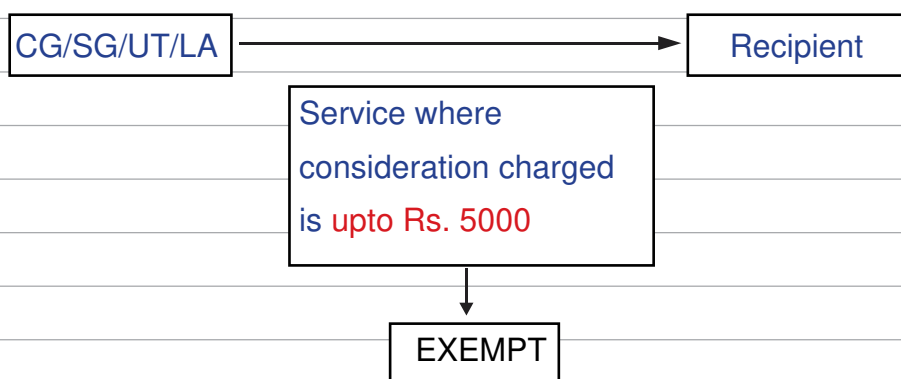
### Entry 8-



Above exemption is not applicable to:

1. Services provided by department of post.....
2. Services provided w.r.t aircraft/vessel.....
3. Transportation of passengers and goods

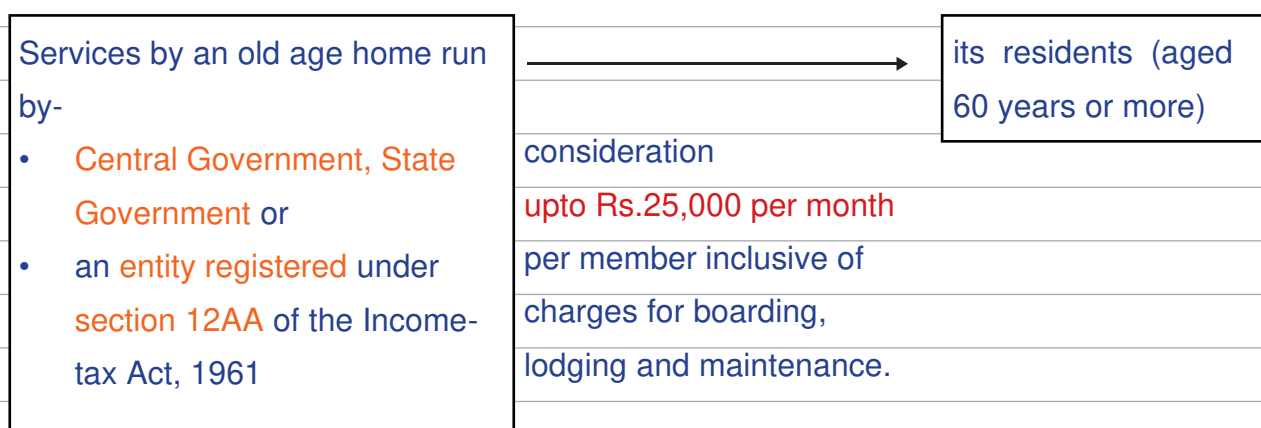
### Entry 9-



Above exemption is not applicable to:

1. Services provided by department of post.....
2. Services provided i.r.t aircraft/vessel.....
3. Transportation of passengers and goods

### Entry 9D-



Entry 47-Services provided by the Central Government, State Government, Union territory or local authority by way of-

- (a) Registration required under any law for the time being in force;
- (b) Testing, calibration, safety check or certification relating to protection or safety of workers, consumers or public at large, including fire license, required under any law for the time being in force.

**Entry 62**-Services provided by the Central Government, State Government, Union territory or local authority by way of tolerating non- performance of a contract for which consideration in the form offines or liquidated damages is payable to the Central Government, State Government, Union territory or local authority under such contract.

**Entry 65**-Services provided by the Central Government, State Government, Union territory by way of deputing officers after office hours or on holidays for inspection or container stuffing or such other duties in relation to import export cargo on payment of Merchant Overtime charges

**Entry 77**-Service by an unincorporated body or a non- profit entity registered under any law for the time being in force, to its own members by way of reimbursement of charges or share of contribution –

(a) as a trade union

(b) for the provision of carrying out any activity which is exempt from the levy of Goods and Services Tax; or

(c) up to an amount of Rs. 7500 per month per member for sourcing of goods or services from a third person for the common use of its members in a housing society or a residential complex.



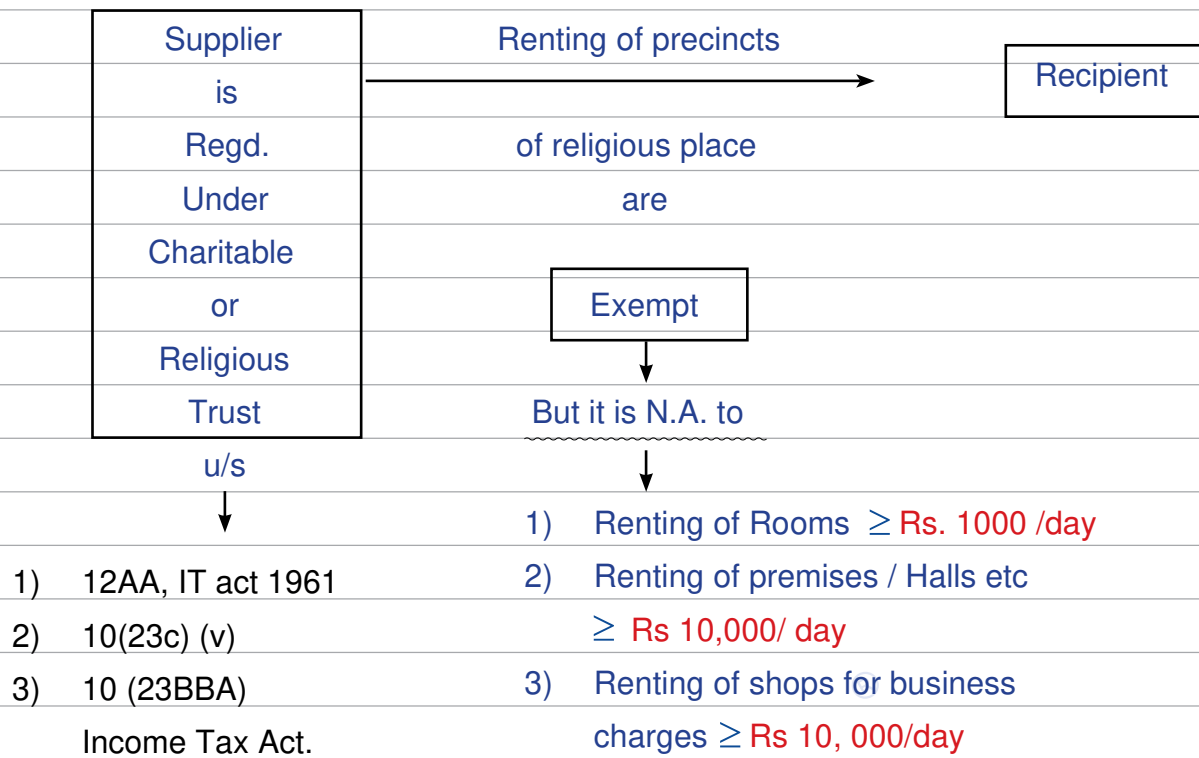
Clarification on issues related to GST on monthly subscription/ contribution charged by a Residential Welfare Association from its members

Issue	Clarification		
Are the maintenance charges paid by residents to the Resident Welfare Association (RWA) in a housing society exempt from GST and if yes, is there an upper limit on the amount of such charges for the exemption to be available?	Supply of service by RWA (unincorporated body or a non- profit entity registered under any law) to its own members by way of reimbursement of charges or share of contribution up to an amount of Rs. 7,500/- per month per member for providing services and goods for the common use of its members in a housing society or a residential complex are exempt from GST.		
A RWA has aggregate turnover of Rs. 20 lakh or less in a FY. Is it required to take registration and pay GST on maintenance charges if the amount of such charges is more than Rs. 7500/- per month per member?	No. If aggregate turnover of an RWA does not exceed Rs.20 Lakh in a FY, it shall not be required to take registration and pay GST even if the amount of maintenance charges exceeds Rs. 7,500/- per month per member. RWA shall be required to pay GST on monthly subscription/ contribution charged from its members, only if such subscription is more than Rs. 7,500/- per month per member and the annual aggregate turnover of RWA by way of supplying of services and goods is also Rs. 20 lakh or more.		
	Annual turnover of RWA	Monthly maintenance charge	Whether exempt?
	More than Rs. 20 lakhs	More than Rs. 7,500/-	No
		Rs. 7,500/- or less	Yes
	Rs. 20 lakhs or less	More than Rs. 7,500/-	Yes
		Rs. 7,500/- or less	Yes

<p>Is the RWA entitled to take ITC of GST paid on input and services used by it for making supplies to its members and use such ITC for discharge of GST liability on such supplies where the amount charged for such supplies is more than Rs. 7,500/- per month per member?</p>	<p>RWAs are entitled to take ITC of GST paid by them on capital goods (generators, water pumps, lawn furniture etc.), goods (taps, pipes, other sanitary/hardware fillings etc.) and input services such as repair and maintenance services.</p>
<p>Where a person owns 2 or more flats in the housing society/residential complex, whether the ceiling of Rs. 7,500/- per month per member on the maintenance for the exemption to be available shall be applied per residential apartment or per person?</p>	<p>As per general business sense, a person who owns 2 or more residential apartments in a housing society/residential complex shall normally be a member of the RWA for each residential apartment owned by him separately. The ceiling of Rs. 7,500/- per month per member shall be applied separately for each residential apartment owned by him.</p> <p>For example, if a person owns 2 residential apartments in a residential complex and pays Rs. 15,000/- per month as maintenance charges towards maintenance of each apartment to the RWA (Rs. 7,500/- per month in respect of each residential apartment), the exemption from GST shall be available to each apartment.</p>

## 1. Services related to charitable and religious activities

Entry No. <sup>3</sup>	Description of services
1	Services by an entity registered under section 12AA of the Income-tax Act, 1961 by way of <b>charitable activities</b> .
13	<p>Services by a person by way of-</p> <p>(a) conduct of any religious ceremony;</p> <p>(b) renting of precincts of a religious place meant for general public, owned or managed by an entity registered as a charitable or religious trust under section 12AA of the Income-tax Act, 1961 or a trust or an institution registered under section 10(23C)(v) of the Income-tax Act or a body or an authority covered under section 10(23BBA) of the said Income-tax Act.</p> <p>However, nothing contained in entry (b) of this exemption shall apply to-</p> <p>(i) <b>renting of rooms</b> where charges are ` 1,000 or more per day;</p> <p>(ii) <b>renting of premises</b>, community halls, kalyanmandapam or open area, and the like where charges are ` 10,000 or more per day;</p> <p>iii) <b>renting of shops</b> or other spaces for business or commerce where charges are ` 10,000 or more per month.</p>
60	Services by a specified organisation in respect of a religious <b>pilgrimage facilitated</b> by the Government of India, under bilateral arrangement.
80	<p>Services by way of training or coaching in recreational activities relating to-</p> <p>(a) arts or culture, or</p> <p>(b) sports by <b>charitable entities</b> registered under section 12AA of the Income-tax Act.</p>



**ENTRY 76** - Services by way of public conveniences such as provision of facilities of bathroom, washrooms, lavatories, urinal or toilets.

**ENTRY 65A** - Services by way of providing information under the RTI act (Right To Information act, 2005)

**ENTRY 59** - Services by a foreign diplomatic mission located in India.

**ENTRY 52** - Services by an organiser to any person in respect of a business exhibition held outside India.

**ENTRY 56** - Services by way of slaughtering of animals.

**ENTRY 50** - Services by public libraries by way of lending of books, publications or any other knowledge enhancing content or material.

**ENTRY 49** - Services by way of collecting or providing news by an independent journalist, Press Trust of India or United News of India.

**ENTRY 23** - Services by way of access to a road or a bridge on payment of toll charges.

**ENTRY 3A** -

Composite supply of goods and services in which the value of supply of goods constitutes not more than 25% of the value of the said composite supply.

provided to CG, SG or UT or LA or a Govt. authority or a Govt. entity

by way of any activity:

in relation to any function entrusted to a Panchayat under article 243G of the constitution or

in relation to any function entrusted to a Municipality under article 243W of the constitution.

**Entry 39** : Services by the following persons in respective capacities -

- (a) business facilitator or a business correspondent to a banking company with respect to accounts in its rural area branch;
- (b) any person as an intermediary to a business facilitator or a business correspondent with respect to services mentioned in entry (a); or
- (c) business facilitator or a business correspondent to an insurance company in a rural area.