

Form No: HCJD/C-121.

ORDER SHEET.

IN THE ISLAMABAD HIGH COURT, ISLAMABAD.
JUDICIAL DEPARTMENT.

F.E.R.A. No.02 of 2025

M/s Askari General Insurance Company Ltd.

Vs.

Commissioner Inland Revenue and another

S. No. of order/ proceedings	Date of order/ Proceedings	Order with signature of Judge and that of parties or counsel where necessary.
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01. 10.03.2025 Syed Ishfaq Hussain Naqvi and Mohammad Ali Haider, Advocates.

The questions of law framed for our consideration are the following:

- i.** Whether, in light of the specific provisions of Section 34 of the Federal Excise Act, 2005, the limitation period for filing an appeal does not commence from the date of announcement of the Order-in-Original but rather from the date of its actual receipt by the aggrieved party?
 - ii.** Whether, in the given facts and circumstances of the case, the Assessing Officer failed to appreciate that the amount of Rs.31,732,000/-, as confronted in the Show Cause Notice, was already accounted for in the Applicant's Books of Accounts as of 31-12-2017, including Federal Excise Duty/Sales Tax on Services and Federal Insurance Fee? Whether the Applicant, having duly disclosed these amounts in its Audited Annual Financial Statements for 2017, specifically in Note-8 (Page 116) for Federal Excise Duty/Federal Insurance Fee (Conventional) amounting to Rs.31,732,200/- and in Note-4 (Page 167) for Window Takaful Operation amounting to Rs.2,244,000/-had already discharged its tax liability accordance with the applicable law?
- 2. Issue notices to the respondents.**

C.M. No.01 of 2025

Notice. In the meanwhile, no coercive recovery shall be affected till the next date of hearing.

C.M. No.02 of 2025

Exemption sought for is allowed, subject to
all just and legal exceptions.

**(SAMAN RAFAT IMTIAZ)
JUDGE**

**(BABAR SATTAR)
JUDGE**

M.A. Raza