Date: 24th March 2022

LIVE COACHING CLASSES
BOARD OF STUDIES(A), ICAI

CA INTERMEDIATE
PAPER 4A: INCOME-TAX LAW
CLUBBING, AND SET-OFF & CARRY FORWARD OF LOSSES

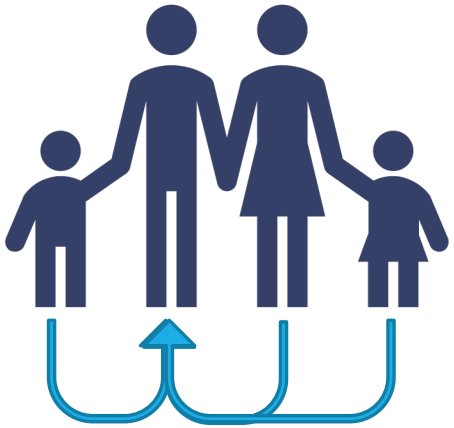
Faculty Name: C. Muthu Palaniappan

INCOME OF OTHER PERSONS INCLUDED IN ASSESSEE'S TOTAL INCOME

Module 3 – Chapter 5

Clubbing – An Introduction [Sec. 60 to 64]

Typical Family



The male member of the family earns salary and is in the highest tax slab. He transfers a property to his spouse, from which the spouse earns rental income.

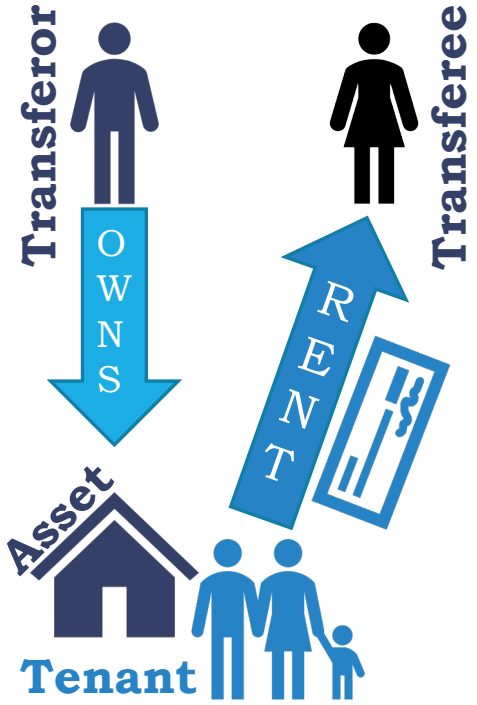
The rental income of spouse will enjoy the benefit of basic exemption limit and lower tax rates, which otherwise would have been taxable at the highest tax slab.

Clubbing of income curbs intentional transfers to reduce tax liability.

Transfer income without transfer of asset [Sec.60]	Income arising from revocable transfer of assets [Sec. 61]	Spouse Income [Sec. 64(1)]	Income of Son's Wife [Sec. 64(1)]	Minor's Income [Sec. 64(1A)]

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Clubbing – Transfer of Income without transfer of asset [Sec. 60]



Asset
- Owned by a person

Income
- Transferred to another person
- Immaterial: Revocable or Irrevocable

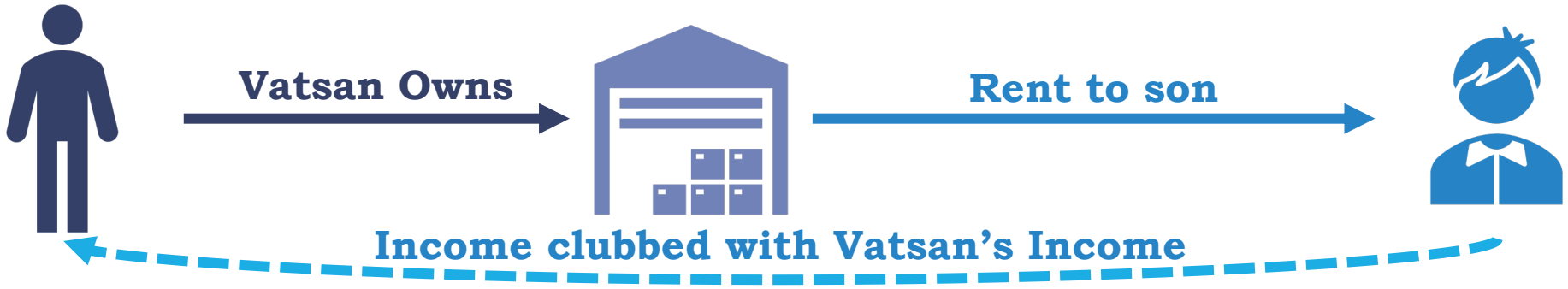
Taxability
- Included in the total income of the transferor

Sec. 63(b): Transfer includes any settlement, trust, covenant, agreement or arrangement

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Clubbing – Transfer of Income without transfer of asset [Sec. 60]

Exercise 1: Mr. Vatsan has transferred, through a duly registered document, the income arising from a godown to his son, without transferring the godown.



Section 60 expressly states that where there is transfer of income from an asset without transfer of the asset itself, such income shall be included in the total income of the transferor. Hence, the rental income derived from the godown shall be clubbed in the hands of Mr. Vatsan.

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Clubbing – Revocable transfer of asset [Sec. 61 to 63]

Section 61: All income arising to any person by virtue of a revocable transfer of assets is to be included in the total income of the transferor.

Sec. 63(a) - Revocable

Transfer shall be deemed to be revocable if:

(i) it contains any provision for the ***re-transfer*** directly or indirectly of the ***whole or any part*** of the income or assets to the transferor;

(ii) it, in any way, gives the transferor a right to ***re-assume*** power directly or indirectly over the ***whole or any part*** of the income or assets

Sec. 62 - Irrevocable

The provisions of sec 61 shall not apply to any income arising to any person by virtue of a transfer-

(i) by way of ***trust*** which is not revocable during the ***lifetime*** of the ***beneficiary***, and, in the case of any ***other*** transfer, which is not revocable during the ***lifetime*** of the ***transferee*** ; or

(ii) made before 1st April 1961, which is not revocable for a period exceeding 6 years

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Clubbing – Revocable transfer of asset [Sec. 61 to 63]

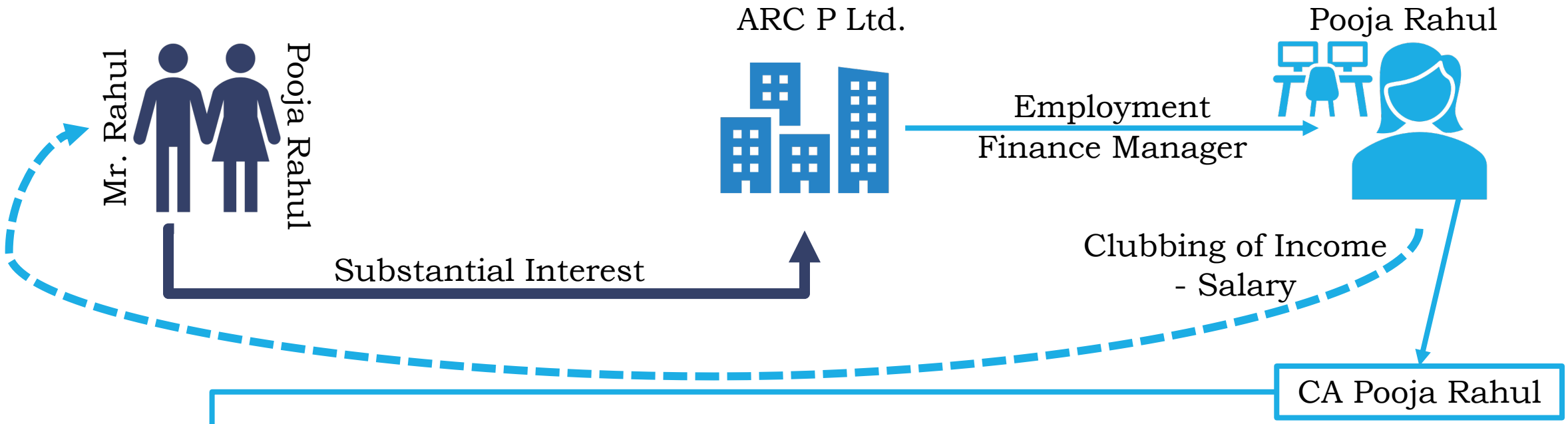
Section 62 – Benefit

If the transferor receives ***direct or indirect benefit*** from such income, such income shall be included in the income of the transferor even though the transfer is irrevocable.

Though the transfer is irrevocable, when the ***power to revoke the transfer arises***, then the income shall be included in the hands of transferor.

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Clubbing – Income arising to spouse – Remuneration - [Sec. 64(1)(ii)]



Provision does not apply	She possesses technical or professional qualifications, and the income is solely attributable to the application of such skill and experience.

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Clubbing – Income arising to spouse – Remuneration - [Sec. 64(1)(ii)]

In computing the total income of any individual, there shall be included all such income as arises directly or indirectly to the spouse of such individual by way of salary, commission, fees or any other form of remuneration whether in cash or in kind from a concern in which such individual has a **substantial interest**.

Company	Other Entity
• Equity shares carrying 20% or more of voting power held by such person + relatives at anytime during the PY	• Such person + relatives are entitled to 20% or more of profits of such concern at anytime during the PY

When both of them have substantial interest and both are in receipt of income, such income will be includible in the hands of the spouse whose total income (excluding this) is higher.

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Clubbing – Spouse Remuneration - Exercise 2 and 3 (SM)

Mr. A holds shares carrying 25% voting power in X Ltd. Mrs. A is working as a computer software programmer in X Ltd. at a salary of ₹30,000 p.m. She is, however, not qualified for the job.

The other income of Mr. A & Mrs. A are ₹7,00,000 & ₹4,00,000, respectively.

Compute the gross total income of Mr. A and Mrs. A for the A.Y.2022-23, assuming that they do not opt for section 115BAC.

Will your answer be different if Mrs. A was qualified for the job?

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Clubbing – Spouse Remuneration - Exercise 4 (SM)

Mr. B holds shares carrying 30% voting power in Y Ltd. Mrs. B is working as accountant in Y Ltd. getting income under the head salary (computed) of ₹3,44,000 without any qualification in accountancy. Mr. B also receives ₹30,000 as interest on securities. Mrs. B owns a house property which she has let out. Rent received from tenants is ₹6,000 p.m.

Compute the gross total income of Mr. B and Mrs. B for the A.Y.2022-23.

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Clubbing – Income arising to spouse – Asset - [Sec. 64(1)(iv)] – Transfer of Asset

House Property	Others
• Sec. 27 • Transfer to spouse without adequate consideration • Provisions does not apply for an agreement to live apart • Transferor – Deemed Owner • Taxed in transferor's hand	• Directly or indirectly • Income arising from transferred asset will be taxed in the hands of transferor

Adequate Consideration



Natural Love & Affection

Sec. 64(1)(vii) – Income arising to person or AOP from assets transferred to such person by an individual is clubbed to the extent such income is used by the transferee for the benefit of transferor's spouse.

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Clubbing – Income arising to spouse – Asset - [Sec. 64(1)(iv)] – Use of Asset

Income Accretion	Investment
• Income from transferred asset alone must be clubbed • Investment from such income not clubbed	• Transferred asset invested in business by business • Proportionate income must be clubbed • If investment is capital, then proportionate interest must be clubbed - 1st April



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Clubbing – Income arising to spouse – Asset - [Sec. 64(1)(iv)] - Exercise 5 (SM)

Mr. Vaibhav started a proprietary business on 01st April 2020 with a capital of ₹5,00,000. He incurred a loss of ₹2,00,000 during the year 2020-21. To overcome the financial position, his wife Mrs. Vaishaly, a software Engineer, gave a gift of ₹5,00,000 on 01st April 2021, which was immediately invested in the business by Mr. Vaibhav. He earned a profit of ₹4,00,000 during the year 2021-22.

Compute the amount to be clubbed in the hands of Mrs. Vaishaly for the Assessment Year 2022-23. If Mrs. Vaishaly gave the said amount as loan, what would be the amount to be clubbed?

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Clubbing – Income arising to son's wife – Transfer by FIL/MIL - [Sec. 64(1)(vi)]

(vi) – W/O Adequate Consideration

- Transfer to son's wife without adequate consideration
- Transferor – Deemed Owner
- Taxed in transferor's hand

(vi) – Investment

- Transferred asset invested in business by business
- Proportionate income must be clubbed
- If investment is capital, then proportionate interest must be clubbed - 1st April

(viii) – Benefit of DIL

- Income arising to person or AOP from assets transferred to such person by an individual is clubbed to the extent such income is used by the transferee for the benefit of transferor son's wife.

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Clubbing – Income arising to spouse – Asset - [Sec. 64(1)(iv)] - Exercise 6 (SM)

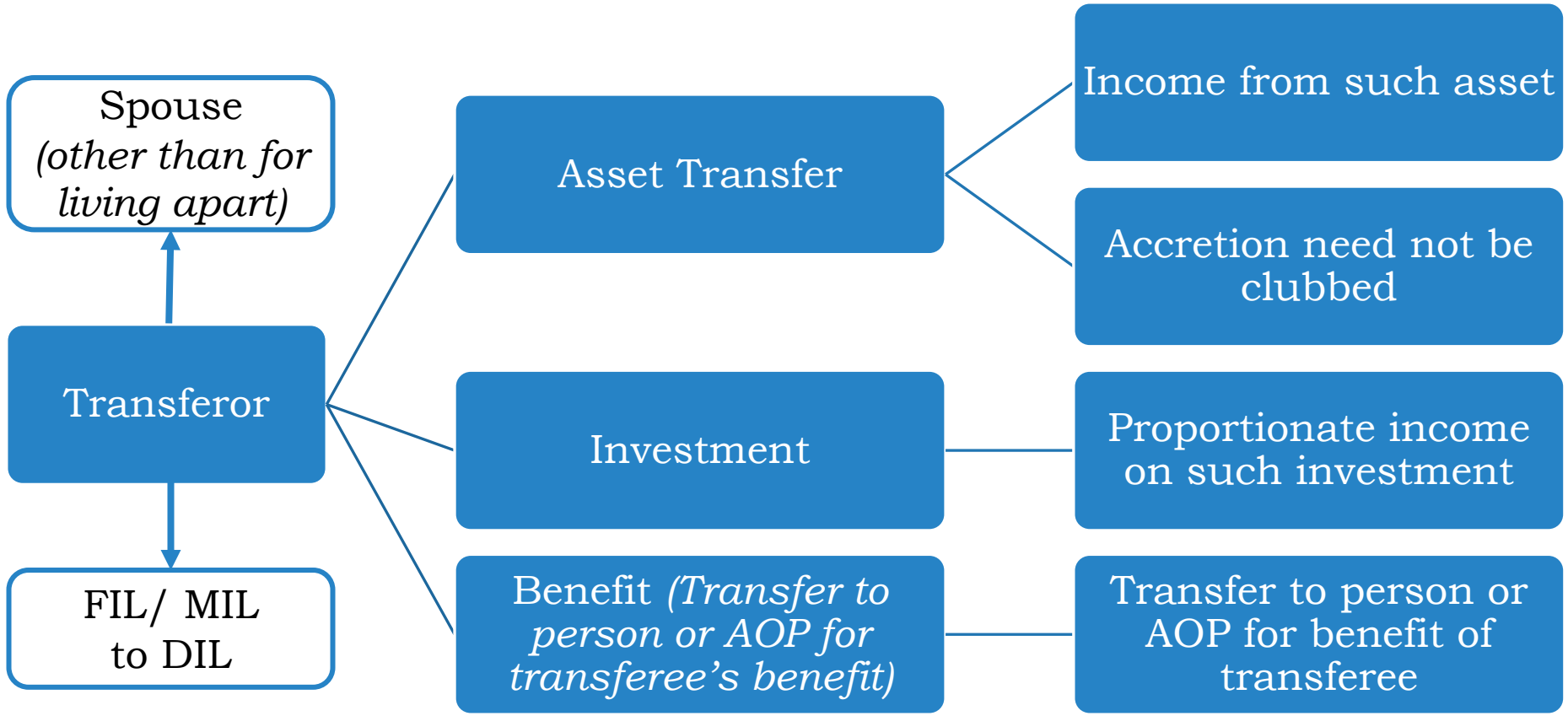
Mrs. Kasturi transferred her immovable property to ABC Co. Ltd. subject to a condition that out of the rental income, a sum of ₹36,000 per annum shall be utilized for the benefit of her son's wife.

Mrs. Kasturi claims that the amount of ₹36,000 (utilized by her son's wife) should not be included in her total income as she no longer owned the property.

Examine with reasons whether the contention of Mrs. Kasturi is valid in law.

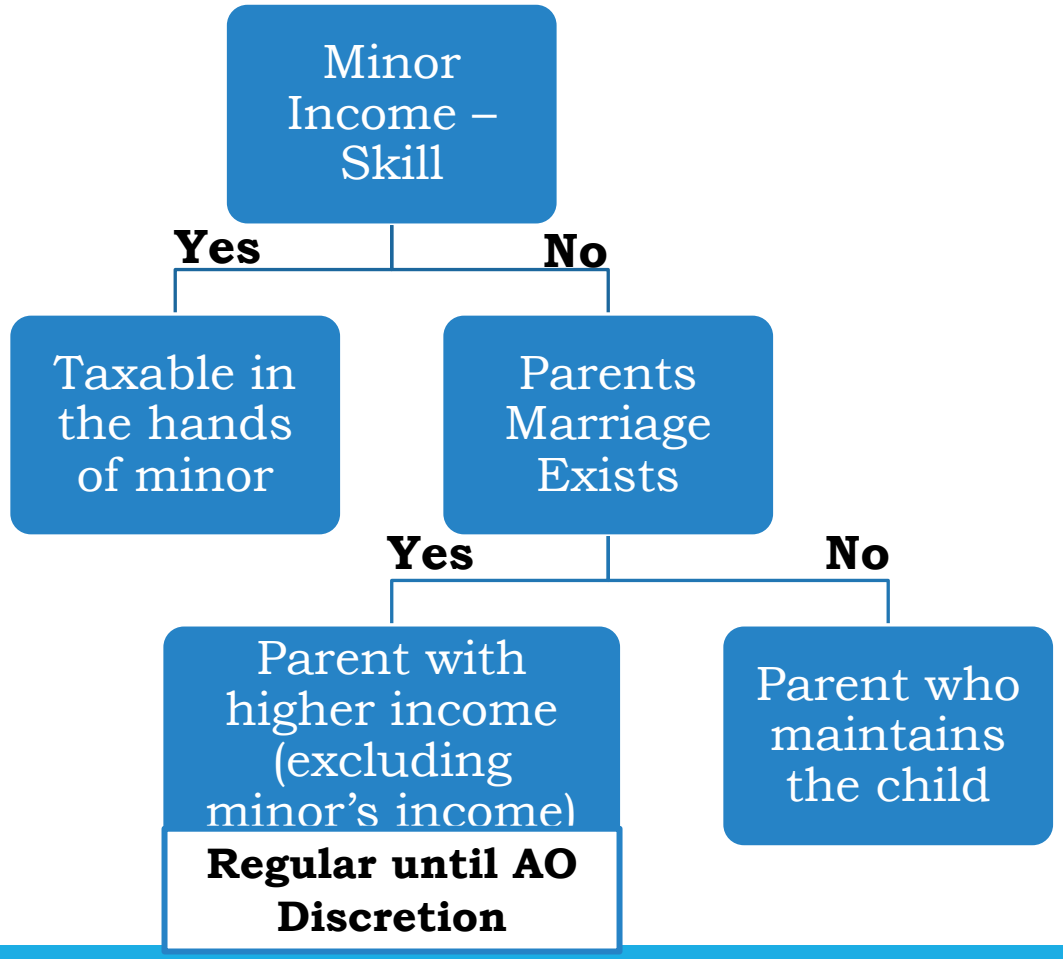
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Clubbing – Income arising to spouse/ son's wife – Recap



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Clubbing – Minor's Income - Sec. 64(1A)



- The income of minor child suffering from disability covered u/s 80U shall not be clubbed but assessed in the hands of the child.
- Clubbing provisions are also attracted even in respect of married minor daughter.
- Exemption in respect of clubbed income u/s 10(32) – Up to ₹1,500 per minor child.

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Clubbing – Income arising to spouse – Asset - [Sec. 64(1)(iv)] - Exercise 7 (SM)

Mr. A has three minor children – two twin daughters and one son. Income of the twin daughters is ₹2,000 p.a. each and that of the son is ₹1,200 p.a.

Compute the income, in respect of minor children, to be clubbed in the hands of Mr. A.

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Clubbing – Income arising to spouse – Asset - [Sec. 64(1)(iv)] - Exercise 8 (SM)

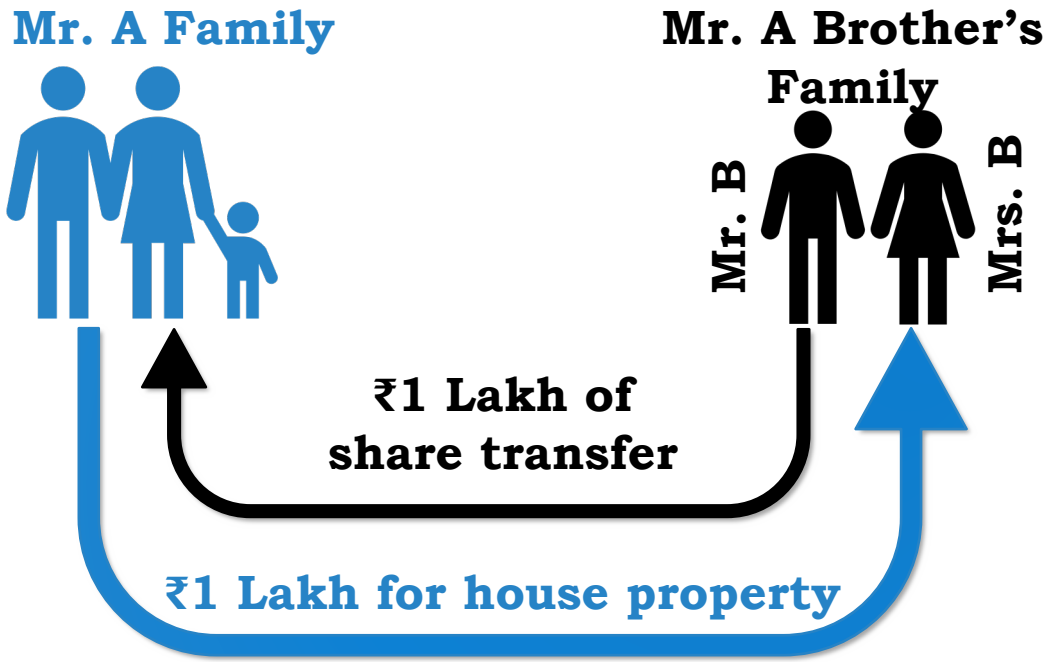
Compute the gross total income of Mr. & Mrs. A from the following information:

	Particulars	Amount
(a)	Salary income (computed) of Mrs. A	2,30,000
(b)	Income from profession of Mr. A	3,90,000
(c)	Income of minor son B from company deposit	15,000
(d)	Income of minor daughter C from special talent	32,000
(e)	Interest from bank received by C on deposit made out of her special talent	3,000
(f)	Gift received by C on 30.09.2021 from friend of Mrs. A	2,500

Brief working is sufficient. Detailed computation under various heads of income is not required.

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Clubbing – Cross Transfer



Mrs. B's house property income should be clubbed with Mr.B.

Dividend from shares transfer of Mr.A's minor son will be clubbed with Mr.A.

A and B are indirect transferors with intention to reduce burden on taxes.

If two transactions are inter-connected and are parts of the same transaction in such a way that it can be said that the circuitous method was adopted as a device to evade tax, the implication of clubbing provisions would be attracted.

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Clubbing – Cross Transfer – Exercise 9 (SM)

Mr. Vasudevan gifted a sum of ₹6 lakhs to his brother's wife on 14the June 2021. On 12-7-2021, his brother gifted a sum of ₹5 lakhs to Mr. Vasudevan's wife. The gifted amounts were invested as fixed deposits in banks by Mrs. Vasudevan and wife of Mr. Vasudevan's brother on 1st August 2021 at 9% interest.

Examine the consequences of the above under the provisions of the Income-tax Act, 1961 in the hands of Mr. Vasudevan and his brother.

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Clubbing – MCQ – Que 1

Arun has sold 7,000, 14% debentures of ₹100 each to his wife for ₹175,000. What will be the interest income to be included in the total income of Arun?

(a) ₹98,000

(b) ₹73,500

(c) ₹24,500

(d) Nil

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Clubbing – MCQ – Que 2

Kumar gifts ₹10 Lakhs to his wife. She invested the same in KA & Co., in which she is a partner. Mrs. Kumar receives ₹1 lakh as her share of profit from such firm. What will be the amount to be clubbed in the income of Kumar?

(a) ₹Nil

(b) ₹1,00,000

(c) ₹5,00,000

(d) ₹10,00,000

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Clubbing – MCQ – Que 3

When you club an income u/s 64, it will be clubbed under the:

(a) Income from other sources

(b) Capital Gains

(c) Business or Profession

(d) Relevant head which the income belongs

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Clubbing – MCQ – Que 4

Ankit transferred ₹1 lakh to his daughter-in-law in 2019 without any consideration. She received ₹12,000 interest on the amount during this previous year. What will be the tax treatment?

(a) ₹12,000 will be taxable in the hands of daughter-in-law

(b) ₹12,000 will be taxable in the hands of Ankit

(c) ₹6,000 will be taxable in the hands of daughter-in-law

(d) ₹6,000 will be taxable in the hands of Ankit

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Clubbing – MCQ – Que 5

Shriya transfers 1,000 debentures of ₹100 each carrying 16% interest to Rahul on the condition that he will have right to receive 4% interest till his life-time. Decide on the taxability.

(a) Irrevocable transfer hence ₹16,000 is taxable in hands of Rahul

(b) Irrevocable transfer hence ₹12,000 is taxable in hands of Rahul and ₹4,000 in hands of Shriya

(c) Revocable transfer hence ₹16,000 is taxable in hands of Shriya

(d) None of the above

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Clubbing – Exercise 10

Compute the income of Mrs. and Mr.Ram for PY 2020-21:

a) Ram transferred his self-acquired property to the HUF, of which he is a member. During the year the HUF earned income of ₹42,000 from this property.
b) During the year, the HUF is partitioned, and the property is divided equally among Mr. Ram, his spouse, their two sons (1 major, and 1 minor), and his brother.
c) He transferred debentures amounting to ₹5 Lakhs (500 debentures @ 12% interest @ ₹1,000 each) to his wife on 1st April 2018.
d) Mr.Ram transfers rent from a property (Monthly ₹10,000) to his close friend on a condition that will revert back to him after his friend's death.
e) Mrs.Ram invests in a fixed deposit out of accumulated interest of ₹1,50,000. She receives ₹12,000 as interest from the deposit.

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Clubbing – Exercise 11

Minor Varsha has the following income in PY 2021-22:

Income	Amount
Prize money from Indian Idol - Junior	2,00,000
Interest - Fixed Deposits	21,000
Interest - Debentures	12,000
Father's income *(including all the income received by Varsha)*	9,50,000
Mother's income	7,50,000

Compute the income of the parents and Varsha for AY 2022-23. Also discuss on the taxability of each of the income earned by Varsha.

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AGGREGATION OF INCOME, SET-OFF AND CARRY FORWARD OF LOSSES

Module 3 – Chapter 6

Set-off & Carry Forward

Inter-Source

- Within the same source
- HP 1 - Loss | HP 2 - Income

Inter-Head

- Between different heads
- Salary - Income | HP - Loss

Carry Forward & Set-off

- Subsequent years

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Set-off & Carry Forward

Profit / Loss *(Set-off)*	Salary	HP	PGBP - S	PGBP - 35AD	PGBP	STCG	LTCG	Horse Race	IFOS
HP	✓*	✓	✓*	✓*	✓*	✓*	✓*	✓*	✓*
PGBP - S	✗	✗	✓	✗	✗	✗	✗	✗	✗
PGBP - 35AD	✗	✗	✗	✓	✗	✗	✗	✗	✗
PGBP	✗	✓	✓	✓	✓	✓	✓	✓	✓
STCL	✗	✗	✗	✗	✗	✓	✓	✗	✗
LTCL	✗	✗	✗	✗	✗	✗	✓	✗	✗
Horse	✗	✗	✗	✗	✗	✗	✗	✓	✗

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Set-off – Inter-source – Sec. 70 - Admissible

Loss from one source is set-off against income from any other source of same head.

Net income of the head



Self-occupied, with housing loan interest



Rented property with income

Loss from exempt source cannot be set-off against taxable source of income.

Eg. Share of loss from partnership firm, Loss from Agriculture

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Set-off – Inter-source – Sec. 70 - Inadmissible

Long Term Capital Loss - [Sec. 70(3)]

- Short-term capital loss is allowed to be set-off with both STCG and LTCG
- Long-term capital loss can be set-off only with LTCG.

Speculation Loss - [Sec. 73(1)]

- Losses from other business can be set-off against speculation income.
- Speculation loss can be set-off only with speculation income.

Race Horse - [Sec. 74A(3)]

- Losses from owning and maintaining race horses can be adjusted only against profits from owning and maintaining race horses.

Loss from specified business - [Sec. 73A(1)]

- Losses from other business can be set-off against profits from business u/s 35AD.
- Loss from specified business can be set-off only with other business u/s 35AD.

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Set-off – Inter-head – Sec. 71



Loss under the head PGBP

- Cannot be set-off against "Salaries"



Loss under the head CG

- Cannot be set-off against any other head



Loss under the head HP

- Maximum loss of ₹2 lakhs can be adjusted against any head



Speculation Loss/ 35AD Loss/ Race Horse Loss

- Not against any other head



Loss under head other than CG

- Loss under a head other than CG can be set-off with any other head including CG.

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Carry Forward & Set-off – Exercise 12 (SM)

Mr. A (aged 35 years) submits the following particulars pertaining to the A.Y.2022-23:

Particulars	Amount
Income from salary (computed)	4,00,000
Loss from self-occupied property	(-)70,000
Loss from let-out property	(-) 1,50,000
Business loss	(-)1,00,000
Bank interest (FD) received	80,000

Compute the total income of Mr. A for the A.Y.2022-23.

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C/F & Set-off - House Property [Sec. 71B]

Set-off	Carry Forward	Maximum
• Maximum of ₹2 lakhs can be adjusted against any head	• Unabsorbed HP loss can be set-off only against HP Income	• Can be carried forward for 8 years immediately succeeding the year of loss

Particulars	Amount
Salaries	10,00,000
HP	(2,50,000)
Total Income	**8,00,000**
C/F HP	*(50,000)*

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Carry Forward & Set-off - Business Loss [Sec. 72]

The loss may be carried forward and set-off against PGBP.

Conditions:

- The loss should have been incurred in the business, profession, or vocation
- The loss should not be in the nature of a loss in the business of speculation
- Need not be necessarily be adjusted against the same business or profession in which loss was incurred.
- Loss must be carried forward by the person who has incurred.
- Successor of business cannot claim carry forward loss except the case of succession by inheritance.
- Loss can be carried forward for 8 years immediately succeeding the year of loss
- Unabsorbed depreciation can be carried forward for unlimited years and can be set-off against any head other than Salary.

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Carry Forward & Set-off – Exercise 13 (SM)

Mr. B, a resident individual, furnishes the following particulars for the P.Y.2021-22:

Particulars	Amount
Income from salary (computed)	45,000
Income from house property	(24,000)
Income from non-speculative business	(22,000)
Income from speculative business	(4,000)
Short-term capital losses	(25,000)
Long-term capital gains	19,000

What is the total income chargeable to tax for the A.Y.2022-23?

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Carry Forward & Set-off - Speculation Business [Sec. 73]

Losses incurred in speculation can neither be set-off in the same year against any other non-speculation income nor be carried forward and set-off against other income in the subsequent years.

Loss from speculation business can be carried forward for a maximum period of 4 years

Following are not speculative in nature:

- Hedging
- Forward contract
- Trading in derivatives
- Trading in commodity derivative
- The principal business is – trading in shares; banking; or granting of loans and advances.
- GTI is primarily – Interest on securities, HP, CG, or IFOS

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Carry Forward & Set-off - Specified Business [Sec. 73A]

Losses incurred in specified business u/s 35AD can neither be set-off in the same year against any other non-specified business nor be carried forward and set-off against other income in the subsequent years.

Loss can be carried forward and set-off indefinitely

Loss can be set-off with another specified business

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Carry Forward & Set-off - Capital Gain [Sec. 74]

Carried forward short term capital loss can be set-off against any capital gains (Short or Long) arising in that year.

Carried forward long term capital loss can be set-off against long term capital gains arising in that year.

Net loss under capital gains cannot be set-off against income under other head.

Long Term Capital Loss u/s 112A can be adjusted against Long Term Capital Gain u/s 112

Any unabsorbed loss can be carried forward for a maximum period of 8 years.

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Carry Forward & Set-off – Exercise 14

During the P.Y. 2021-22, Mr. C has the following income and the brought forward losses:

Particulars	Amount
Short term capital gains on sale of shares	1,50,000
Long term capital loss of A.Y.2020-21	(96,000)
Short term capital loss of A.Y.2021-22	(37,000)
Long term capital gain	75,000

What is the capital gain taxable in the hands of Mr. C for the A.Y.2022-23?

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Carry Forward & Set-off - Owning & Maintaining Race Horses [Sec. 74A(3)]

Losses incurred in owning and maintaining race horses can be set-off against profits from owning and maintaining race horses.

Any unabsorbed loss can be carried forward for a maximum period of 4 years.

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Carry Forward & Set-off – Exercise 15

Mr. D has the following income for the P.Y.2021-22:

Particulars	Amount
Income from the activity of owning and maintaining the race horses	75,000
Income from textile business	85,000
Brought forward textile business loss (relating to A.Y. 2021-22)	50,000
Brought forward loss from the activity of owning and maintaining the race horses (relating to A.Y.2019-20)	96,000

What is the total income chargeable to tax for the A.Y.2022-23?

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Carry Forward & Set-off - Order of Set-off post carry forward

- Current year depreciation u/s 32(1)
- Current year capital expenditure on scientific research and expenditure on family planning
- Brought forward loss from business / profession
- Unabsorbed depreciation u/s 32(2)
- Unabsorbed capital expenditure on scientific research u/s 35(4)
- Unabsorbed expenditure on family planning

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Carry Forward & Set-off - Return of losses – Sec. 80

- Business loss u/s 72(1)
- Speculation Business loss u/s 73(2)
- Loss from Specified Business u/s 73A(2)
- Loss under the head capital gains u/s 74(1)
- Loss from owning and maintaining of race horses u/s 74A(3)

Assessee must have filed return of loss u/s 139(3) to claim carry forward losses.

This does not apply for house property loss u/s 71B and unabsorbed depreciation u/s 32(2)

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Set-off & Carry Forward - Recap

Profit / Loss *(Set-off)*	Salary	HP	PGBP - S	PGBP - 35AD	PGBP	STCG	LTCG	Horse Race	IFOS
HP	✓*	✓	✓*	✓*	✓*	✓*	✓*	✓*	✓*
PGBP - S	×	×	✓	×	×	×	×	×	×
PGBP - 35AD	×	×	×	✓	×	×	×	×	×
PGBP	×	✓	✓	✓	✓	✓	✓	✓	✓
STCL	×	×	×	×	×	✓	✓	×	×
LTCL	×	×	×	×	×	×	✓	×	×
Horse	×	×	×	×	×	×	×	✓	×

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Set-off & Carry Forward - Recap

Head - Source	Years
House Property	Adjust loss upto ₹2 lakhs and carry forward for 8 Years
PGBP - Speculative	4 Years No limit for unabsorbed depreciation, expenditure on scientific research and family planning
PGBP - Specified	No limit
PGBP	8 Years No limit for unabsorbed depreciation, expenditure on scientific research and family planning
STCG	8 Years
LTCG	8 Years
Horse Race	4 Years

Once carried forward a loss can be set-off only against the same head in the forthcoming assessment years
Carry forward unabsorbed depreciation can be adjusted under any head other than salary

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Carry Forward & Set-off - Exercise 16

Surat Limited, engaged in the business of textiles also effected the sales and purchase of shares of other companies. It suffered loss from such transactions:

- Whether such company can set off its losses from share trading, from the profit of textile business?
- If principal business of such company is sale and purchase of shares of other company, then what would be your answer?

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Carry Forward & Set-off - Exercise 17

ST & Co., a partnership firm was dissolved as per the dissolution deed of the partnership firm, with effect from 18th September 2021, S, one of the partners of erstwhile firm took over the entire business of the partnership firm in his individual capacity including fixed assets, current assets, and liabilities and the other partner was paid his dues. He then continued the business as a sole proprietor with effect from that date. The assessee, claimed the set-off of the losses suffered by the erstwhile partnership firm against his income earned as an individual proprietor, considering the case as inheritance of business.

Discuss the treatment.

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Carry Forward & Set-off - Exercise 18

Compute the gross total income of Mr. F for the A.Y. 2022-23 from the information given below –

Particulars	Amount
Income from house property (computed)	1,25,000
Income from business (before providing for depreciation)	1,35,000
Short term capital gains on sale of unlisted shares	56,000
Long term capital loss from sale of property (brought forward from A.Y. 2021-22)	(90,000)
Income from tea business	1,20,000
Dividends from Indian companies carrying on agricultural operations (Gross)	80,000
Current year depreciation	26,000
Brought forward business loss (loss incurred six years ago)	(45,000)

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Clubbing – MCQ – Que 6

Under which of the following income a loss from regular business can be adjusted

(a) Profits from speculation business

(b) Long term capital gains

(c) Income from Other Sources

(d) All of the above

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Clubbing – MCQ – Que 7

During PY 2020-21, Sourav reports loss of ₹3 lakhs from house property, and a salary income is ₹2.50 Lakhs. What would be the taxable income of Sourav for AY 2021-22?

(a) ₹2,50,000

(b) ₹2,00,000

(c) ₹50,000

(d) Nil

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Clubbing – MCQ – Que 8

R, A, N, and D are equal partners of a firm – RAND & Co. The firm's loss was determined to be ₹2,40,000 for the year ended 31st March 2021. D retired from the firm on 31st March 2021, and R, A, and N continued the firm in the name of RAN & Co.

The firm made a profit of ₹2,00,000 for the year ending 31st March 2022. What would be the taxable income of RAN & Co. for AY 2022-23.

(a) Nil

(b) ₹20,000

(c) ₹1,20,000

(d) ₹2,40,000

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Clubbing – MCQ – Que 9

During the previous year an assessee has incurred loss from his business amounting to ₹1,20,000 whereas his income from house property is ₹1,10,000. The assessee in this case can carry forward

(a) Business loss of ₹10,000

(b) Business loss of ₹1,20,000

(c) Nil

(d) None of the above

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Clubbing – MCQ – Que 10

Mr. Guna has loss of ₹1,20,000 from trading in share derivatives carried out in a recognized stock exchange. The loss can be set off

(a) From the income from speculative business only

(b) From the income from non-speculative business only

(c) From the income of any business operated by Guna

(d) From the income under any head of income

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THANK YOU

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[muthuca]

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