BUDGET PRECIS 2023-2024

PKF

Contents

PREFACE

Financial Year (FY) 2023 was the most challenging year for Pakistan's economic history mainly due to following factors:

* Political instability of Pakistan;
* Supply disruptions and financial crisis caused by devastating flood in many areas of Pakistan;
* Russia – Ukraine war which affected the demand-supply balance and adversely impacted the global economic growth;
* Fiscal mismanagement causing significant depreciation of PKR against US Dollar and other foreign currencies.
* High commodities prices coupled with massive depreciation of PKR resulted in unprecedented inflationary surge in Pakistan's history; and
* Delay in resumption of currently suspended IMF Program.

The recent economic survey depicts unusual helplessness of the Government in many sectors. The real GDP growth has hardly touched 0.29% for FY2023 (FY2022: 6.1%), while the growth in other major sectors also declined dramatically vis-a-vis Agriculture sector 1.55% (FY2022: 4.27%), Industrial sector -2.94% (FY2022: 6.83%) and Services sector 0.86% (FY2022: 6.59%).

The Current Account Deficit narrowed down by 76% to USD 3.3 billion versus USD 13.7 billion in FY2022 due to major decline of imports by 29.2% YoY. The exports observed a decline of 12.1% YoY attributed to a slump in both the industrial and agricultural sectors. However, the export to import ratio has improved in FY2023 on the basis of restrictive import regime under SBP guidelines. The fiscal deficit stands at 3.6% of GDP as compared to 3.9% in the same period of last year. Moreover, the primary balance was in surplus of Rs. 503.8 billion during July-March of FY2023 as compared to a deficit of Rs. 447.2 billion in same period of FY2022. The total FBR revenue and non-tax revenue collection grew by 17.6% and 25.5% respectively. The CPI inflation recorded a substantial increase of 29.1% (FY2022: 11.26%). As a result of contractionary measures to limit inflation, policy rate currently stands at 21%, as opposed to 13.75% at the beginning of FY2023. Together, these indicators have made up a negative outlook of Pakistan's economy.

After dealing with a wearisome period and preceding macro imbalances, the Government now aims to present a growth-oriented budget after considering elements of real economy. The overall outlay of budget 2023-24 is Rs. 14,461 billion out of which current expenditure is estimated at Rs. 13,320 billion (92.1%). Subsidies are aimed to decrease by Rs. 29 billion and tax revenue is targeted at Rs. 9,200 billion while aiming at a GDP growth forecast of 3.5%.

In order to achieve the aforementioned goals been set by the government, for the tax related revenues, the government has issued the Finance Bill, 2023. Budget Precis 2023-24 gives a brief insight of major proposed amendments made through the Finance Bill 2023.

This document is accurate to the best of our knowledge and belief at the time of its provision for issuance. It is intended to provide only a general outline of the Finance Bill presented by the Government of Pakistan for the fiscal year 2023-24. Expert opinion on specific proposed changes should be sought before taking decision having major economic significance. PKF F.R.A.N.T.S., Chartered Accountants and PKFI do not accept any responsibility for any loss arising from any action taken or not taken by anyone using this document.

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INCOME TAX ORDINANCE

DEFINITIONS:

I. The amendment has been proposed in clause 29 to enhance the scope of "income" by adding Bonus Shares in the definition of the income. Bonus shares were specifically excluded in the definition of income till Finance Act 2014 and earlier it was included in the definition of dividend income under clause 19. Now, income from bonus shares is proposed to be included under the head of "income from other source" under section 39(1)(lb). A new section 236Z has also been proposed under which Advance Tax shall be collected from shareholders by the companies on the issuance of Bonus Shares (notional income) at the rate of 10% on the value as below:

Listed Companies:	Day-end price on the first day of closure of books
Other Companies:	As prescribed

Section 236Z further requires the Companies to deposit the tax collected within 15 days of the closure of books even if the company was not able to collect tax from the shareholder. However, it is proposed that companies can dispose off the bonus shares to the extent of the recoverable tax if the shareholder does not pay tax and collect his bonus shares. Value of Bonus Shares will be treated as income from other sources and the tax so collected will be the final tax. Accordingly, amendment has also been proposed in the sections 168 and 169.

ii. Definition of "permanent establishment" under clause 41 has been proposed to widen its scope as earlier only establishments having Fixed Place was included in the definition. Now a person with a Mobile Place can also be treated as a permanent establishment.
Another amendment has been proposed to include any entity engaged by the person for furnishing services in addition to employees and personnel.

iii. A clause 59 has been proposed to be substituted to redefine Small and Medium Enterprises (SMEs) whose business turnover does not exceed Rs. 800 million. Earlier the upper limit of turnover was Rs. 250 million. The scope of SMEs has been further extended to the persons providing IT Services or IT-enabled services. Earlier only manufacturers qualify as SMEs.

SUPER TAX

Super Tax on high-earning persons was imposed under section 4C through Finance Act, 2022. Now the provision of Advance Tax under section 147 has also been proposed to be applicable from Tax Year 2024 on total income tax payable including Super Tax. A similar amendment has also been proposed in section 147. The Super Tax rates have been increased from 4% to 10% introducing different slabs and made applicable across the board.

FOREIGN INVESTMENT - REQO DIK

A scheme of foreign investment was introduced through Foreign Investment (Promotion and Protection) Act, 2022 promulgated in December 2022 to protect the foreign investor in the Reqo Dik Project in Balochistan wherein the project/company was given complete protection from all types of taxes, levies, and duties. Now Section 44 is proposed to be inserted to exempt such projects from income, including capital gain, withholding tax, minimum tax and final taxes chargeable under the Income Tax Ordinance.

TAX CREDIT FOR CONSTRUCTION OF HOUSE

In order to promote the construction industry and encourage taxpayers to build own new houses; a tax credit has been proposed under section 65I for the Tax Year 2024 to the Tax Year 2026. Provided that the said house is completed during the said tax year and the completion certificate is furnished along with the return. The tax credit shall be lesser of:

10% of the tax assessed; or
Rs. 1 million

Another condition is proposed with this tax credit that the layout plan of this new house is approved by the concerned authority on or after the first day of July 2023.

ASSOCIATE AND RELATIVES

Section 85 defining the scope of the Associates has been proposed to include:

a. Where one person sufficiently influences either alone or together with associate the other person. The term 'sufficiently influence' is explained as a situation where one person or both persons, directly or indirectly, are economically and financially dependent on each other and decisions are made by the directions, instruction, or wishes of each other for a common economic goal.

b. The concept of associate has been widened and it shall cater for benami transactions and will give more power to FBR when the transaction occurs between associates under financial control or with resident of a jurisdiction with a zero-taxation regime so that the tax avoidance in those transactions can be thoroughly checked.

ADDITIONAL TAXES ON CERTAIN INCOME, PROFIT AND GAINS

An overriding section 99D has been proposed through which additional tax shall be imposed on every person who has any income, profit, or gains that have arisen to any person or class of persons due to any economic factor or factors that resulted in unexpected income, profits, or gains whether or not disclosed in the financial statements. Alarmingly, the implications of this section will be on any of the preceding five Tax Years from the Tax Year 2023 and onwards.

The Federal Government may notify and determine the economic factors, tax rates, scope, time, and exemptions via official gazette notification. Economic factor(s) are initially proposed to be international price fluctuation having a bearing on any commodity price in Pakistan or any sector of the economy or difference in foreign currency fluctuation. The proposed tax rate may go up to 50%.

Federal Government may exempt any person or classes of persons, any income, or classes of income from the application of this section, subject to any condition as may be specified. However, the proposed addition to the rules of the Fourth, Fifth, and Seventh Schedules indicates that this section is initially applicable to Insurance businesses, Petroleum companies, and Banking companies. This appears to be an 'intractable move' by the government with an indefinite scope and it may be prone to misuse of authority by the FBR officials. However, as economic factors, rate of tax, scope, time and payment of tax have to be specified through notification in the official Gazette, these provisions will not be effective until such notification is issued.

UNEXPLAINED INCOME/ASSET AND FOREIGN REMITTANCES

i. Under Section 111(4), the threshold of foreign remittance has been proposed to increase from PKR 5 million to USD 100,000 in a financial year which comes to approximately Rs. 30 million as per the prevailing exchange rates. No source of income can be questioned by the department if the foreign remittance is remitted from outside Pakistan through normal banking channel, either through banks or money service bureaus or exchange companies and realized in accordance with the terms specified therein.

ii. This is just to refresh the Exporters that they have to prepare the financial statements and get these audited for the Tax Year 2023 and submit them along with their tax returns. As an important amendment targeting the final tax regime businesses, particularly for exporters, was introduced through Finance Act 2022 which provided that the exporter shall not be entitled to take credit for any sum above imputable income. The imputable income on work back formula as devised under section 2(28A) ranges from

3% to 5% of export. If the profit of any exporter exceeds the 3% to 5% range, then he is required to submit the financial statements duly audited by a firm of Chartered Accountants. Even after the submission of audited accounts, the officer has the authority to make sure that 'the excess amount is reasonably attributed to the business activities.

RECOVERY OF LIABILITY OUTSTANDING UNDER OTHER LAWS

A new Section 146D has been proposed that any outstanding liability under any statute or law concerning any defaulter, Commissioner Inland Revenue shall make the recovery of such liability and deposit the recovered liability in the designated account specified in that law.

WITHHOLDING TAX EXEMPTION TO NON-RESIDENTS

While making a payment to a non-resident, an exemption certificate is required under 152(5A) where the Commissioner is required to issue the certificate or pass an order within 30 days of the receipt of the request from the withholding agent. Now further facilitation has been proposed under this section that where the Certificate /order is not issued by Commissioner within 30 days, the Certificate shall be automatically processed in IRIS and issued. However, the commissioner may modify or cancel the certificate, which is issued automatically by the system, based on reasons to be recorded after providing the opportunity of being heard to the taxpayer.

EXPORT FACILITATION SCHEME 2021 (EFS)

An amendment has been proposed in Section 154(3B) to allow the exporters registered under EFS to deduct tax at the rate of 1% while making payments to indirect exporters.

EXPORT OF SERVICES

A proviso has been proposed under section 154A(2)(c) which excludes the exporters of IT services from the requirement of filing of sales tax returns under the Federal or Provincial Laws.

INTERNATIONAL CENTER OF TAX EXCELLENCE

A new section 230J has been proposed to establish an institute titled as International Center of Tax Excellence. The Board may establish a committee to monitor the Institute including the appointment of the Project Director for the purpose and provide such data to the Institute as is necessary for processing and analysis and for discharging its obligations. Provided that such data shall be anonymized before transmission to the Institute and identifying particulars of the taxpayers shall be kept confidential in accordance with the provisions of Section 216(7).

Functions, structure, roles, resources, data, and functions of this institute are proposed below:

Functions	Contribute in: * Development of tax policy, Model national tax policy * Delivery of interdisciplinary research in tax administration and policy * International tax cooperation, Revenue forecasting * Conducting international seminars, workshops and conferences, Capacity building of Inland Revenue Officers, Tax analysis * Improvement in design and delivery of tax administration for maximizing revenue within existing provisions to close the tax gap or any other function as directed by the Board or the Federal Government.
Structure	Nominating Committee: Members: Minister-in-Charge, Secretary Revenue Division, and Secretary Finance

	Roles: 1. Recommend a panel to the Federal Government for the appointment of an Executive Director and independent members of the Executive Committee, which shall be appointed by the Federal Government. 2. Prescribe criteria for making recommendations of the panel for the Executive Director and independent members of the Executive Committee. <u>Executive Committee:</u> Members: Chairman FBR, Member (IR-Policy), Member (IR- Operations) and two independent members to be appointed by the Federal Government. Executive Director shall act as Secretary of the Executive Committee. Roles: 1. EC shall assign the requirements of the Board to be undertaken by the Institute, during the year. 2. Prescribe rules for recruitment of the employees of the Institute. At least 50% of the employees shall be serving or retired Inland Revenue officers having at least 5 years of experience in tax policy or tax administration. The remuneration and term of employment of the employees of the Institute shall be as prescribed by the Federal Government. <u>Executive Director:</u> Chief Executive of the Institute and shall be independent.

WITHHOLDING TAX ON CASH WITHDRAWALS

Once again it is proposed the advance adjustable tax shall be deducted, under section 231AB, by the banks at the rate of 0.6% of the cash withdrawals from a person whose name is not appearing on Active Taxpayer List on the sum total of cash withdrawal from bank accounts in a day exceeding Rs. 50,000. It has been further clarified that the said Rs. 50,000 shall be the aggregate of cash withdrawals in a single day.

ADVANCE TAX ON FOREIGN DOMESTIC WORKERS

It is proposed that any authority which is issuing a domestic aide visa to a foreign national as a domestic worker shall collect an advance tax of Rs. 200,000 from the agency, sponsor or the personal employing such foreign national at the time of issuing or renewing visa. This tax is adjustable for withholdee as per section 231C.

ADVANCE TAX ON PURCHASE OF PROPERTIES FOR NON-RESIDENTS

Earlier, tax collected under section 236K from a non-resident buyer was a final tax. Now it is proposed that this tax shall not apply to a buyer or transferee who is a non-resident individual holding POC or NICOP and has acquired the said immovable property through a Foreign Currency Value account.

FIRST SCHEDULE AMENDMENTS

i. Finance bill proposes rationalization of tax under section 4C for the Tax Year 2023 on income by enhancing rates for persons earning more than Rs. 300 million by introducing the additional slabs which are as follows:

Sr. No.	Income under section 4C	Rate of tax	
		For Tax Year 2022	For Tax Year 2023 and onwards
(1)	(2)	(3)	(4)
1	Where income does not exceed Rs. 150 million	0%	0%
2	Where income exceeds Rs. 150 million but does not exceed Rs. 200 million	1%	1%
3	Where income exceeds Rs. 200 million but does not exceed Rs. 250 million	2%	2%
4	Where income exceeds Rs. 250 million but does not exceed Rs. 300 million	3%	3%
5	Where income exceeds Rs. 300 million but does not exceeds 350 million	4%	4%
6	Where income exceeds Rs. 350 million but does not exceeds 400 million	4%	6%
7	Where income exceeds Rs. 400 million but does not exceeds 500 million	4%	8%
8	Where income exceeds Rs. 500 million	4%	10%

ii. It has been proposed to reduce minimum tax u/s 113 of the Income Tax Ordinance, 2001 on the companies listed on Pakistan Stock Exchange from 1.25% to 1% of their turnover if they are not covered in reduced rate under other clauses.

iii. Finance Bill has proposed to enhance advance tax rate for commercial importers importing goods classified in Part III of the Twelfth Schedule from 5.5% to 6%.

iv. Finance Bill has proposed increase of 1% in the with holding tax rates as per detail given below:

Section	Description	Current Rate	Proposed Rate
152(2A)(a)	Purchase of goods from a permanent establishment (PE) of a non-resident person which is a company	4%	5%
152(2A)(a)	Purchase of goods from a PE of a non-resident person other than a company	4.50%	5.50%
152(2A)(b)	Transport, IT and other specified services from a PE of a non-resident person	3%	4%
152(2A)(b)	Other than specified services from a PE of a non-resident person-Company	8%	9%
152(2A)(b)	Other than specified services from a PE of a non-resident person-Other than Company	10%	11%
152(2A)(b)	Execution of contract from a PE of a non-resident person by any person other than a sportsperson	7%	8%
153(1)(a)	Withholding tax on supply of goods by a company	4%	5%
153(1)(a)	Withholding tax on supply of goods by a person other than company	4.50%	5.50%

Section	Description	Current Rate	Proposed Rate
153(1)(b)	Withholding tax on supply of services by a company other than those services which are subject to reduced with-holding tax	8%	9%
153(1)(b)	Withholding tax on supply of services by a person other than a company other than those services which are subject to reduced with-holding tax	10%	11%
153(1)(b)	Withholding tax on supply of services for Transportation, courier and other specified services	3%	4%
153(1)(b)	Withholding tax on rendering of a contract by any person other than a company or a sports person	7%	8%
153(1)(b)	Withholding tax on rendering of a contract by a company	6.50%	7.50%

v. Finance Bill has proposed that the reduced rate of 0.25% of export proceeds of Computer software or IT services or IT Enabled services by persons registered with Pakistan Software Export Board to continue till Tax Year 2026.

vi. Finance Bill proposes to enhance advance tax on amount remitted abroad through credit, debit or prepaid cards from 1% to 5% of the gross amount remitted abroad.

SECOND SCHEDULE
Part I – EXEMPTIONS FROM TOTAL INCOME

i. Finance Bill proposes to exempt all income of following:

* The Prime Minister's Relief Fund for Flood, Earthquake and Other Calamities
* Film and Drama Finance Fund
* Export-Import Bank of Pakistan
* Shaheed Mohtarma Benazir Bhutto Institute of Trauma, Karachi
* Shaheed Zulfikar Ali Bhutto Institute of Science and Technology

ii. Finance Bill proposes to extend the exemption on profits and gains on the sale of immoveable property or shares of Special Purpose Vehicle to any type of REIT scheme up to the 30th day of June, 2024.

iii. Finance Bill proposes to extend the exemption from tax to residents domiciled in the Tribal Area forming part of the Provinces of Khyber Pakhtunkhwa and Balochistan till 30th June 2024.

iv. It has been proposed to extend the benefit of exemption in clause 150 to Alteraz Engineering Consultant (Reqo Dek Project) from Tax Year 2017.

Part III – REDUCTION IN TAX LIABILITY

i. Profits and gains of an agro-based small and medium enterprise setup in a rural area especially for agriculture-based industry have been proposed to be exempted from Income Tax for a period of 5 years commencing from Tax Year 2024 up to Tax Year 2028.

ii. Finance Bill proposes to provide the tax credit on the business income of a builder from a new building whose project has been registered with DNFBP of 10% or Rs. 5 Million, whichever is less, for the Tax Year from

2024 to Tax Year 2026 on the submission of return along with completion certificate from the relevant authority. The layout plan of the building must be approved by the concerned authority on or after 01 July 2023.

iii. Finance Bill proposes to provide the tax credit on the business income of a Youth Enterprise for Tax Years from 2023 to 2026 to promote business activity by young entrepreneurs as per following details:

-For individuals & AOP	50 % of tax payable or Rs. 2 million whichever is lower
-For companies	50 % of tax payable or Rs. 5 million whichever is lower

Youth Enterprise means a startup established on or after first day of July, 2023 as sole proprietorship, or an AOP or a company with a condition that all owners, partners or shareholders must be less than 30 years of age on the first day of related tax year.

PART IV EXEMPTION FROM SPECIFIC PROVISIONS

Exemption from specific provisions have been proposed for Prime Minister Relief Funds for flood, earthquake and other calamities or already concluded activities.

SEVENTH SCHEDULE

Reduced rates for additional advances under rule 7E, 7D and 7E have been proposed to be extended from 30th June 2023 to 30th June 2025.

Advances issued by banks to Information Technology and IT enabled services enterprises shall be taxed @ 20% instead of normal rate applicable to banking company. However, this reduction in rate shall be subject to submission of auditors certificate and details of advances as may be required by Commissioner Income Tax.

Finance Bill proposes to not to apply provisions of subrule 6A of Rule 6C regarding the tax rates in accordance with the gross advances to deposit ratio as on last day of the tax year for Tax Year 2024.

EIGHTH SCHEDULE

In addition to capital gains tax, NCCPL has been also proposed to be made responsible for the computation and collection of tax under section 4C at the applicable rates on the amount of capital gains computed under this Schedule.

THIRTEENTH SCHEDULE

Tax credit for donations to The Prime Minister's Relief Fund for Flood, Earthquake and Other Calamities and Film and Drama Finance Fund has been proposed under the provisions of Section 61 of the Income Tax Ordinance.

FOURTEENTH SCHEDULE

Small and Medium enterprises engaged in IT services or IT enabled services have been proposed to be registered with and duly certified by the Pakistan Software Export Board, in addition to registration with SMEDA or through IRIS portal.

Applicable tax rates have been amended as follows:

Category	Turnover (PKR Million)	Existing Tax Rate	New Tax Rate
1	0-100	7.5% of taxable income	7.5% of taxable income
2	100-250	15% of taxable income	15% of taxable income
3	250-800	New Category	20% of taxable income

Option of final tax regime			
Category	Turnover (PKR Million)	Existing Tax Rate	New Tax Rate
1	0-100	0.25% of gross turnover	0.25% of gross turnover
2	100-250	0.5% of gross turnover	0.5% of gross turnover
3	250-800	New Category	0.75% of gross turnover

SALES TAX ACT, 1990

SECTION 2-DEFINITIONS

1. Production, transmission and distribution of electricity has been proposed to be deleted from definition of goods (12) and supply (33).
2. Shop area requirements for retailers has been proposed to be withdrawn.

SECTION 30CA

Name of the Directorate General of Digital Invoicing and Analysis is proposed to be changed to Directorate General of Digital Initiatives

SECTION 33

Curative amendment introduced in clause 23 of section 33 with respect to specified goods as against cigarette packs.

FIFTH SCHEDULE

* Zero rating proposed for imports or supplies made by, for or to a qualified investments under the Foreign Investment (Promotion and Protection) Act, 2022.
* Zero rating regime also proposed for other drawing, marking out or mathematical calculating instruments besides existing geometry boxes.
* Zero rating also proposed for commodities supplied to registered exporters under Export Facilitation Scheme, 2021.

SIXTH SCHEDULE

- Exemption proposed to be withdrawn for the red chilies, ginger and turmeric sold under brand names and trademarks. Earlier such exclusion from exemption was available for items sold in retail packings only.
- Exemption proposed to be withdrawn for yogurt, butter, desi ghee, cheese including processed, products of meat or meat offal, meat of bovine animals, fish and crustaceans sold under a brand name.
- Exemption is proposed to be extended for newly merged districts to June 2024 which was going to expire on June 2023.
- Entries related to exemption for auto disable syringes and its raw materials are proposed to be deleted being already expired on December 31, 2021.
- Exemption of Sales Tax are proposed for the following items.

  * Contraceptive and accessories thereof;
  * Bovine semen
  * Saplings
  * Combined Harvester – Thresher
  * Dryer for agricultural products
  * No-till-direct seeder, planters, trans-planters and other planters
  * Import of goods as mentioned under S. No. 159 of Part III of Fifth Schedule to the Customs Act, 1969 (IV of 1969) chargeable to customs duty at the rate of zero percent, subject to the conditions, restrictions and limitations mentioned therein, by the software exporters registered with the Pakistan Software Export Board.

EIGHTH SCHEDULE

Reduced rate of 12% is proposed to be 15% for the retailers' making supplies of textile and leather products through POS.

THE FEDERAL EXCISE ACT, 2005

SECTION 3

Any item specified in the First Schedule is proposed to be charged for duty. Reference to the First Schedule has specifically been added in the body of this section with regard to chargeability of duty under the law.

SECTION 29

The Directorate General of Digital Initiatives is proposed to be established under the law.

SECTION 40

New provision is proposed whereby all rules made under the law shall be collected, arranged and published alongwith general orders and departmental instructions and rulings and sold to general public or placed regularly in the official website.

FIRST SCHEDULE

* Excise duty for energy inefficient fans both locally manufactured and imported which do not comply with the MEPS, notified by PSQCA is proposed to be Rs. 2,000 per fan.
* Excise duty for Incandescent bulbs both locally manufactured and imported is proposed to be 20% ad valorem.
* In addition to the Franchise Services, Royalty and Fee for Technical Services are also proposed to be added for the excise duty charge of 10%.

THIRD SCHEDULE

Exemption is proposed for the excisable goods (local and import) and services by, for or to a qualified investments under the Foreign Investment (Promotion and Protection) Act, 2022.

ISLAMABAD CAPITAL TERRITORY (TAX ON SERVICES) ORDINANCE, 2001

SECTION 3

Freelance exporters exclusively dealing in export of IT and IT enabled services are proposed to be given status of cottage industry where revenue do not exceed eight million rupees. Such person will not to be required to be registered under the Ordinance.

Freelance exporters are defined as “freelance exporter means a person who works on per job and on self-employed basis without being attached to or under employment of any other person, having the liberty to work on various tasks simultaneously.”

Zero rating also proposed for services supplied to registered exporters under Export Facilitation Scheme, 2021.

THE SCEDHULE

TABLE 1

* Services provided or rendered by hotels, motels, guest houses, farmhouses, restaurants, marriage halls, lawns, clubs and caterers were being taxed at 15%. Through this finance bill, restaurants, cafes, food parlors, coffee houses/shops, deras, food huts, eateries, resorts and similar cooked, prepared or ready-to-eat food service outlets etc. are proposed to be taxed at 5% where payment is received through banking/digital means and 15% where payment is received in cash.
* Services provided by software or IT-based system development consultants are proposed to be taxed at 15% against prevalent rate of 16%.
* Electric Power Transmission Services are proposed to be included for a tax rate of 15%.

TABLE 2

Reduced rate of 5% available to IT services and IT enabled services revamped with no input adjustment and definition of these services in line with as available in the Income Tax Ordinance, 2001.

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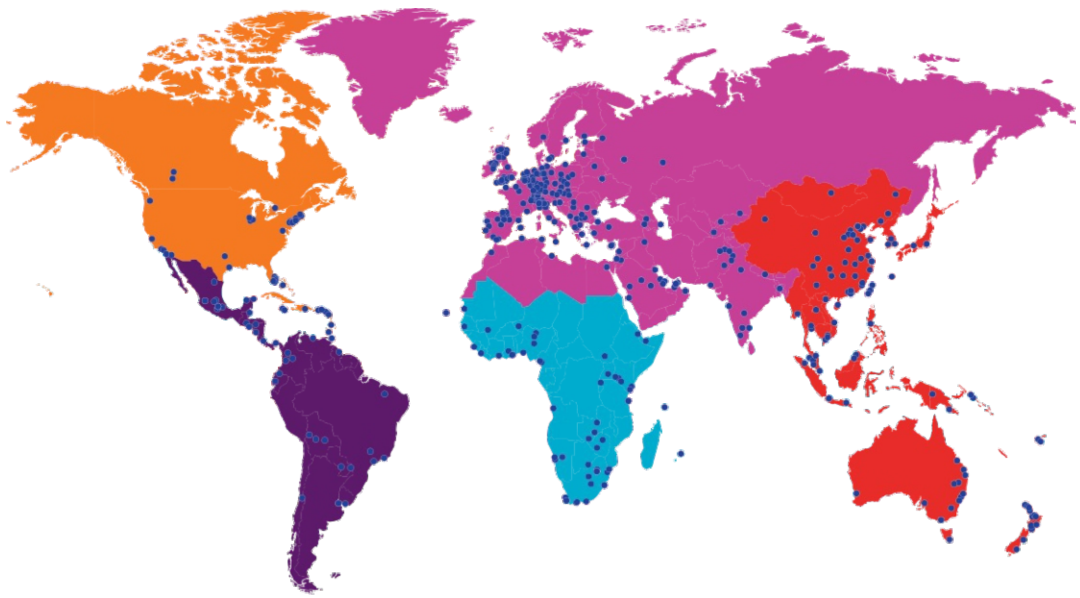

224 firms

Over **480** offices worldwide

Operational in **150** countries

Ranks **15th** international accountancy network

20,000 professionals across the globe

Member firm generate **1.4** billion in aggregate fee income

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