

M/s All Rajasthan Corrugated Board and Box Manufacturers Association

Authority for Advance Ruling — Rajasthan

RAJ/AAR/2019-20/07 dated 17.05.2019

Q Questions Before the Authority

- What shall be the nature of service and classification in accordance with Notification No. 11/2017- CT(R) dated 28.06.17 read with annexure attached to it in relation to services provided by the applicant to the delegates and exhibitors?
- In relation to the brand promotion packages offered by the applicant in the course of the event, what shall be the nature of service and classification, and whether the applicant is liable to pay tax or the liability falls on the recipient under reverse charge?
- Whether Input Tax Credit is admissible for the applicant in respect of tax paid on services provided by the hotel, supply of food and beverages by outside caterers, and services provided by event manager like pickup & drop, exhibition stall setup, tenting, etc.?

F Facts

The applicant is an association organizing a conference and exhibition in Jaipur. They offer a bundle of services to delegates, including technical seminars, accommodation, and food, and charge participation fees to exhibitors for trade show space and brand promotion. The applicant sought a ruling on the classification of these supplies and the eligibility of Input Tax Credit on various inward supplies procured for the event.

H Ruling

Classification of services to delegates and exhibitors	Composite supply classifiable under HSN 998596	Taxable at 18% (9% CGST + 9% SGST)
Classification and tax liability for brand promotion packages	Composite supply classifiable under HSN 998397	Taxable at 18% under forward charge; not covered under reverse charge
Admissibility of Input Tax Credit	Admissible	Allowed for hotel services, outside catering, and event management services used for taxable outward supplies

The Authority ruled that the services provided to delegates and exhibitors constitute a **composite supply** classifiable under HSN 998596, taxable at 18%. Brand promotion packages are also a composite supply classifiable under HSN 998397, taxable at 18% under the forward charge mechanism. Input Tax Credit is held to be admissible on the specified inward supplies as they are used in the course of business for providing taxable outward supplies.

R Reasoning

The Authority applied the definition of composite supply under Section 2(30) of the CGST Act, determining that the services are naturally bundled with a principal supply. For delegates, the principal supply is the organization of the conference, while for exhibitors, it is the organization of the trade show. The Authority relied on Section 8 of the CGST Act to determine the tax liability based on the principal supply. Regarding Input Tax Credit, the Authority concluded that the inward supplies are used in the course of business to provide taxable outward supplies, thus satisfying the eligibility criteria under Section 16 and not being barred by the restrictions in Section 17(5) of the CGST Act.

P Provisions Relied On

Section 2(30) of the CGST Act, 2017

Section 8 of the CGST Act, 2017

Section 16 of the CGST Act, 2017

Section 17(5) of the CGST Act, 2017

Notification No. 11/2017-Central Tax (Rate) dated 28.06.2017

! For the Practitioner

This ruling provides clarity for event organizers on the classification of bundled services and the eligibility of ITC on event-related expenses. It confirms that such organizers can claim ITC on hotel, catering, and event management services when these are used to provide taxable outward supplies. Practitioners should note that the ruling specifically distinguishes between sponsorship services and branding, confirming that branding services are subject to forward charge.

Source

Summary prepared from the published order, which is a scanned document. It is a reading aid and not the authority: where the two differ, the order governs. Verify every provision against the original before relying on it.

Original order: www.gstcouncil.gov.in -> raj.aar-2019-20_07-arcbbma.pdf

Prepared 20-10-2026.

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