M/s Britannia Industries Limited, Plot No. 74B and 74C, Sector II, Bidadi Industrial Area, Shanumangala Post, Ramanagara, Karnataka - 562109

Authority for Advance Ruling — Karnataka

Advance Ruling No. KAR ADRG 05 / 2019, Date: 04-04-2019 Dated **04.04.2019**

Q Questions Before the Authority

- Whether the promotional product would qualify to be a supply liable to GST?
- Whether the supply of the main product with free product would fall within the mischief of a mixed supply attracting the rate of tax of the product attracting the highest rate of tax?

F Facts

The applicant manufactures food products including biscuits, breads, cakes and rusks. As part of its sales promotion, it offers certain products free along with the main product, without any change in the price of the main product. The applicant sought an advance ruling on the GST treatment of the free promotional product and on whether the combined supply is a mixed supply.

H Ruling

The authority disposed of the application as **withdrawn** . The applicant had requested withdrawal by letter dated 02.04.2019, stating that the CBIC had issued a clarification on the issue. The order contains **no ruling on the merits** of either question.

R Reasoning

The order is a procedural disposal. The applicant asked, by letter dated 02.04.2019, to withdraw the application because the Central Board of Indirect Taxes and Customs had issued a clarification on the issue raised. The authority allowed the withdrawal under the advance ruling provisions and recorded the disposal under sub-section (4) of Section 98 of the CGST and KGST Acts. The order does not discuss the promotional product, the valuation of the free item, or the mixed supply question, and it does not identify the CBIC clarification relied on by the applicant.

P Provisions Relied On

Section 97 of the CGST Act, 2017 and the KGST Act, 2017 (application for advance ruling)

Sub-section (4) of Section 98 of the CGST Act, 2017 and the KGST Act, 2017 (order disposing of the application)

Prepared as a reading aid. Where this summary and the original order differ, the order governs.

Rule 104 of the CGST Rules, 2017 and the KGST Rules, 2017 (form GST ARA-01)

! For the Practitioner

This order helps a practitioner only to confirm that the free-with-main-product question was put before the Karnataka authority and was not decided there. It should not be cited as authority on whether a free promotional item is a taxable supply or how a mixed supply is taxed. The CBIC clarification the applicant relied on is not named in the order, so the practitioner would need to locate it separately.

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 -> krntk_05-2019_bil.pdf

Prepared 01-11-2026.

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Pune (HQ)
RTC Silver, B4-708, Sai Satyam Park, Wagholi, Pune, Maharashtra 412207

Mumbai
104, Rajshila Building, 597 J.S.S. Road, Marine Lines, Mumbai 400002

Delhi
3rd Floor, B-6/154-155, Sector 5, Rohini, Delhi 110085

Gurugram
Pioneer Urban Square, B109, Golf Course Ext Road, Sector 62, Gurugram...

Ahmedabad
Phoenix Tower, 1107, near Commerce Six Road, Drive In Road, Navrangp...

Talk to us: **+91 94594 56700** | sales@patronaccounting.com | patronaccounting.com