

Indian Co-Operative Credit Society Limited

Authority for Advance Ruling — Keralam

ADVANCE RULING No. KER/02/2026

Dated **23.03.2026**

Q Questions Before the Authority

- Whether the sharing of amounts by the Applicant to its members who act as facilitators constitutes a supply as defined under Section 7 of the CGST Act, 2017, and accordingly attracts levy of GST under Section 9 of the CGST Act, 2017 read with the Kerala State GST Act, 2017?
- Whether any GST is leviable on any transactions made between the Applicant and its members including those who act as facilitators?
- What is the classification of service if the answer to (1) and (2) is in the affirmative?
- If the answer to the above question (1) and (2) is in affirmative, whether the GST is exempt on transactions between the Applicant and its members, including facilitators?

F Facts

The applicant is a Multi-State Co-operative Credit Society providing credit facilities and accepting deposits from its members. It engages certain members as facilitators to promote its objectives and shares amounts with them for these activities. The applicant contends that these transactions are governed by the principle of mutuality and do not constitute a supply under the GST law.

H Ruling

Admissibility of questions

Not admissible

Rejected under Section 97(2) and 98(2) of the CGST Act, 2017

The Authority rejected the application as not admissible. It held that the questions raised do not fall within the scope of Section 97(2) of the CGST Act, 2017, and that the issues have already been examined in previous adjudication proceedings against the applicant. Consequently, no ruling was issued on the merits of the questions.

R Reasoning

The Authority determined that the questions regarding services rendered by facilitators do not relate to supplies undertaken by the applicant, thus falling outside the scope of Section 97(2). Furthermore, it noted that the issue of taxability of transactions between the society and its members was already examined in Order-in-Original No. 21/2023-24-GST (ADJ). Therefore, the application is barred under Section 98(2) of the CGST Act, 2017, as it pertains to an issue already decided in proceedings initiated against the applicant. The Authority refrained from examining the merits, including the applicability of the doctrine of mutuality.

P Provisions Relied On

Section 7 of the CGST Act, 2017

Section 9 of the CGST Act, 2017

Section 97(2) of the CGST Act, 2017

Section 98(2) of the CGST Act, 2017

Notification No. 12/2017-Central Tax (Rate) dated 28.06.2017

! For the Practitioner

This ruling serves as a **procedural dismissal** rather than a substantive decision on the taxability of co-operative society transactions. It highlights that the AAR will not entertain applications where the subject matter is already pending or has been decided in other adjudication proceedings. Practitioners should note that the **doctrine of mutuality** remains unaddressed by this Authority in this specific case.

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 -> 2-indian co operative credit society ltd.pdf

Prepared 12-10-2026.

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