

M/s House Construct Infra

Authority for Advance Ruling — Karnataka

KAR.ADRG 20/2026

Dated **16.03.2026**

Q Questions Before the Authority

- taxability on supply of pure labour service to various single standalone residential dwelling units.

F Facts

The applicant is engaged in the supply of pure labour services for construction, erection, commissioning, or installation of original works. These services are provided exclusively to individual owners of stand-alone residential dwelling units. The applicant does not supply any materials or goods in the execution of these contracts.

H Ruling

Taxability of pure labour service to single standalone residential dwelling units

Exempt from GST

Subject to the activity qualifying as original works and the unit being a single stand-alone dwelling not part of a residential complex

The authority ruled that the services provided by the applicant are exempt from GST. This exemption applies specifically to pure labour contracts for original works on single residential dwelling units that do not form part of a residential complex.

R Reasoning

The authority relied on Entry Serial No. 11 of Notification No. 12/2017-Central Tax (Rate) dated 28.06.2017. It determined that the applicant's services satisfy the essential conditions of being a pure labour contract for original works on a single residential unit. The ruling clarifies that the **exemption does not extend** to services provided for apartment buildings or residential complexes comprising multiple units with shared facilities. The decision turned on the interpretation of the phrase 'otherwise than as a part of a residential complex'.

P Provisions Relied On

Section 97(2)(b) of the CGST Act, 2017

Section 97(2)(e) of the CGST Act, 2017

Entry Serial No. 11 of Notification No. 12/2017-Central Tax (Rate) dated 28.06.2017

Paragraph 2(zs) of Notification No. 12/2017-CT (R)

Paragraph 2(zzb) of Notification No. 12/2017-CT (R)

Paragraph 2(zze) of Notification No. 12/2017-CT (R)



For the Practitioner

This ruling confirms that pure labour contracts for construction on **stand-alone residential units** are exempt from GST. It provides a clear distinction between individual residential units and those forming part of a larger residential complex. Practitioners can use this to advise contractors who operate exclusively on independent residential projects.

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 -> [7-aar-house_construct_infra-compressed.pdf](#)

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