

M/s. HP India Sales Private Limited

Authority for Advance Ruling — Maharashtra

NO.GST-ARA- 38/17-18/2024-25/B-641, Mumbai, dt. 30.12.2025

Dated 30.12.2025

Q Questions Before the Authority

- Classification of ElectroInk supplied along with consumables under GST.
- Determination of time and value of supply of ElectroInk with consumables under the indigo press Contract.

F Facts

The applicant supplies HP Indigo digital printing presses and associated consumables (ElectroInk, imaging plates, blankets, etc.) to authorized resellers. These supplies are provided under a 'click model' where the reseller is billed based on the number of prints generated, rather than for individual items. The applicant contended that this bundle constitutes a composite supply with ElectroInk as the principal supply.

H Ruling

Classification of ElectroInk with consumables	Mixed supply	Attracts the highest rate of tax amongst all goods in the supply
Time and value of supply	Time: earlier of invoice or payment date; Value: transaction value per invoice	Determined under Section 12(2) and Section 31(4) of the CGST Act

The Authority held that the supply of ElectroInk along with consumables and operator parts is a mixed supply, not a composite supply. Consequently, the supply is classified as a mixed supply, attracting the highest rate of tax applicable among the constituent goods. The time of supply is determined as the earlier of the date of invoice or the date of receipt of payment, and the value is the transaction value as reflected in the tax invoice.

R Reasoning

The Authority reasoned that the goods are not naturally bundled in the ordinary course of business, as customers have the option to purchase items separately under an 'A La Carte' model. Furthermore, no single item in the bundle qualifies as a 'principal supply' because all components are equally indispensable for the printing process. Therefore, the transaction fails the criteria for a **composite supply** under Section 2(30) and instead meets the definition of a **mixed supply** under Section 2(74) of the CGST Act. The Authority also noted that the billing mechanism does not override the statutory classification of the underlying goods.

P Provisions Relied On

Section 2(30) of the CGST Act

Section 2(74) of the CGST Act

Section 2(32) of the CGST Act

Section 8 of the CGST Act

Section 12(2) of the CGST Act

Section 15 of the CGST Act

Section 31(4) of the CGST Act

! For the Practitioner

This ruling serves as a warning for businesses that bundle distinct goods under a single price model, even if the bundle is standard industry practice. It clarifies that the existence of an alternative procurement option (like the 'A La Carte' model here) can be fatal to a **composite supply** claim. Practitioners should note that the Authority prioritizes the ability to supply goods independently over the commercial convenience of a bundled pricing model.

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-ms_hp_india_sales.pdf

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