

M/s SAYRE THERAPUETICS PRIVATE LIMITED

Authority for Advance Ruling — Karnataka

Advance Ruling No. KAR ADRG 05 / 2018 dated 21st March, 2018

Dated 21.03.2018

Q Questions Before the Authority

- Whether the Applicant qualifies as clinical establishment?
- Whether the services provided by the applicant qualifies to be health care services?

F Facts

The applicant is a healthcare company involved in oncology and immunology diagnostics. They facilitate sophisticated genetic and microarray-based tests by collecting patient samples, coordinating with international laboratories, and providing pre- and post-test counseling. The applicant sought an advance ruling on whether these services qualify as exempt health care services.

H Ruling

Whether the Applicant qualifies as clinical establishment?	Yes	The applicant provides diagnostic services in the Allopathy system of medicine.
Whether the services provided by the applicant qualifies to be health care services?	Yes	The services are exempt at a NIL rate of central tax.

The Authority ruled that the applicant qualifies as a clinical establishment and that their services constitute health care services. Consequently, the intra-state supply of these services is exempt from tax under the specified notification.

R Reasoning

The Authority determined that the applicant meets the definition of a clinical establishment under Clause 2(s) of Notification No. 12/2017-Central Tax (Rate) because they offer diagnostic facilities in a recognized system of medicine. Furthermore, the services provided, including diagnosis and counseling, fall under the definition of health care services per Clause 2(zg) of the same notification. Since the applicant is involved in the complete cycle of the testing process, their activities are **exempt from tax** under SL. No. 74 of the aforementioned notification.

P Provisions Relied On

Section 98(4) of the Central Goods and Services Tax Act, 2017

Section 98(4) of the Karnataka Goods and Services Tax Act, 2017

Notification No. 12/2017-Central Tax (Rate) dated 28th June, 2017 (Clause 2(s), Clause 2(zg), and SL. No. 74)

! For the Practitioner

This ruling confirms that entities acting as intermediaries in the diagnostic process, including patient counseling and sample management, can qualify as clinical establishments. It provides a **favorable precedent** for diagnostic service providers to claim an exemption on their services. However, it is specific to the applicant's business model and does not provide a blanket exemption for all medical-related business activities.

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 -> 05-sayre_therapeutics-aar-order.pdf

Prepared 15-10-2026.

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