

M/s. Network For Information & Computer

Authority for Advance Ruling — Madhya Pradesh

Order Number 04/2019 dated 10.04.19

Q Questions Before the Authority

- Whether exemption provided under Sr. No. 72 of Not. No. 12/2017 Central Tax(Rate), dated 28-06-17 issued by the Central Government under CGST Act, 2017 and exemption provided under Sr. No. 72 of Not. No. FA-3-42/2017/1/V(53) dated 30-06-2017 issued by the Madhya Pradesh Government under M.P. Goods & Services Tax Act, 2017 is applicable to the applicant?
- Whether services provided by the applicant fall under Sr. No. 72 of the Not. No. 12/2017 Central Tax(Rate), dated 28-06-17 issued by the Central Government under CGST Act, 2017 and exemption provided under Sr. No. 72 of Not. No. FA-3-42/2017/1/V(53) dated 30-06-2017 issued by the Madhya Pradesh Government under M.P. Goods and Service Tax Act 2017?

F Facts

The applicant is a registered entity providing skill development training services to the Uttar Pradesh Skill Development Society (UPSDS). They sought an advance ruling on whether these services qualify for the tax exemption provided under Serial Number 72 of Notification No. 12/2017-Central Tax (Rate). The applicant acts as a private training partner for the UPSDS.

H Ruling

Applicability of exemption under Sr. No. 72 **Not applicable**

Services must be provided to Central or State Government or Union Territory Administration

The Authority ruled that the applicant is not entitled to the benefit of the exemption. It held that the exemption is only available if the services are provided directly to the Central Government, State Government, or Union Territory Administration. Since the applicant provided services to a society and failed to prove it was an arm of the government, the exemption was denied.

R Reasoning

The ruling turned on the interpretation of the condition in Serial Number 72 of Notification No. 12/2017-Central Tax (Rate), which requires services to be provided to the Central Government, State Government, or Union Territory Administration. The Authority found that the applicant provided services to a society, UPSDS, and failed to provide evidence that this society constitutes the government. Consequently, the conditions for the exemption were not met. The Authority emphasized that the intent of the legislature is to exempt services provided directly to government bodies under specific training programs.

P Provisions Relied On

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

Section 98(4) of the CGST Act 2017

Section 11(1) of the CGST Act 2017

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

Notification No. FA-3-42/2017/1/V(53) dated 30.06.2017

! For the Practitioner

This ruling clarifies that the **exemption for training services** under Serial Number 72 is strictly limited to services provided directly to government entities. It serves as a warning to private training partners that providing services to societies or autonomous bodies may not qualify for the exemption unless they can prove the entity is effectively the government. It does not decide the taxability of services provided to other types of government-affiliated organizations.

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 -> mp-04-2019-network_for_info_comp.pdf

Prepared 20-10-2026.

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