

# **GCA KPK SALES TAX ON SERVICE ACT, 2022 – SUMMARY NOTES**

**PRESENTATION OF**



**GCA TEAM**

# NOTE

**Summary notes are valid for  
professionals & students appearing in  
ICAP, ICMAP, PIPFA & equivalent  
examinations.**

Towards Self-Reliance

**IKIP**  **RA**  
KEYBEREK PAKETI UNKEYBEREK BENTENLEK AYTTEREK

# NOTE

## Old Act

- **Khyber  
Pakhtunkhwa  
Finance Act, 2013**

## New Act

- **Khyber  
Pakhtunkhwa Sales  
Tax on Services Act,  
2022**

# DEFINITIONS

# **ACCOUNTANT – SECTION - 2A**

**a chartered accountant, as defined in the Chartered Accountants Ordinance, 1961 and includes the associate and fellow members**

**a cost and management accountant, as defined in the Cost and Management Accountants Act, 1966 and includes the associate and fellow members**

**a firm or an association of chartered accountants or cost and management accountants**

**other accountants or association of accountants notified, in this behalf, by the Management Committee**

# **AGENT – SECTION - 20**

Agent means a person, who is authorized to act on behalf of another person, called the principal, to create a legal relationship with a third party.

# **BUSINESS BANK ACCOUNT** **[SECTION 2(L)]**

**Bank account of a person used for business transactions, and such account is declared by him in the prescribed application, for registration submitted for obtaining a registration number or for changing the particulars.**



**CODE – SECTION - 2M**

Code of Criminal  
Procedure, 1898.

# **COLLECTORATE – SECTION - 2P**

Office of the Collector or the Collector (Appeals), having jurisdiction specified under this act and notifications issued thereunder.

## **TAXPAYER** **[SECTION 2(AAJ)]**

It means any person, who is required or is liable to pay or is paying tax, or any sum under the act and the rules, and includes any person, other than a government employee, who is assigned any duty or responsibility to withhold, deduct, collect or deposit tax under this act and the rules.

# **COMPANY – SECTION - 2F**

## **Includes:**

- **Banking and non-banking finance company**
- **Modaraba as defined in the Modaraba Companies and Modaraba (Floatation and Control) Ordinance, 1980;**
- **Financial institution as defined in the Financial Institutions (Recovery of Finances) Ordinance, 2001, including a microfinance institution licensed under the Microfinance Institution Ordinance, 2001 and an Islamic financial Institution.**
- **An insurance company, as defined in the Insurance Ordinance, 2000**

# **PLACE OF BUSINESS – SECTION - 2AN**

A liaison office and a person who provides services without having physical presence in KPK has been added in the definition of 'place of business'.



## **ACTIVE TAXPAYER** **[SECTION 2(B)]**

It includes a registered person who regularly files return and pays tax as due and is appearing in the active taxpayer's list.

# **BANKING COMPANY AND COMPANY** **[SECTION 2(R)]**

**The definition of banking company is merged into the definition of company.**

**Modaraba has been restricted to mean a modaraba company as defined in related regulations.**

**Financial institution includes a financial institution as defined in related regulations.**



# DUE DATE [SECTION 2(X)]

In relation to;

- filing of returns
  - extended to 18th day of the month following the end of the tax period from the earlier date of 15th.
- ‘the payment date of tax
  - 15th day of the month following the end of the tax period.

# GOODS [SECTION 2(AD)]

**materials,**

**commodities and**

**articles specified in chapters 1 to 97 of the first schedule  
to the Customs Act, 1969**

# **INPUT TAX** **[SECTION 2(AF)]**

**Definition of 'input tax' earlier provided in the Khyber Pakhtunkhwa Revenue Authority Sales Tax on services regulations, 2017 is now included in the act.**

**Exclude sales tax paid under Islamabad Capital Territory (Tax on Services) Ordinance, 2001 (ICT ordinance). Taxpayers will no longer be able to claim sales tax on services paid under ICT Ordinance as input tax.**

**PERSON**  
**[SECTION 2(AM)]**

Definition of 'person' has  
been amended to include an  
agency.

## **PLACE OF BUSINESS** **[SECTION 2(A)]**

A liaison office and a person who provides services without physical presence in KP in definition of 'place of business'.

## **SERVICE** **[SECTION 2(AAA)]**

‘Service’ is to include facilities, amenities, utilities or advantages by whatever name called and are liable to sales tax on services as specified in the first schedule’.

# **PRAL – SECTION - 2AP**

Pakistan Revenue  
Automation (Private) Limited.

# **TAX FRACTION – SECTION - 2AAH**

Amount worked out in accordance with the following formula;

$$\mathbf{A^* + (100 + a)}$$

*\*‘A’ is the rate of tax applicable to taxable services in terms of section 9 of this act;*



# **POLICY BOARD – SECTION - 2AO**

Policy Board, established  
under the Act.

# **NON-RESIDENT – SECTION - 2AJ**

Person who is not a resident  
person for such tax year

# **TAX FRAUD** **[SECTION 2(AAD)]**

**The scope of the term tax fraud has been enhanced to include the following:**

- **Issuing invoice or bill of taxable services without the provision of that taxable service; or**
- **Failing to pay an amount of tax collected under section 20 of the Act, and failing to pay the amount of tax withheld under section 14 of the Act or the rules; or**
- **Under-stating or under-paying the tax liability or over-stating the entitlement of tax credit or**
- **adjustment or claiming or obtaining in-admissible tax credit, refund or adjustment; or**
- **Not filing the tax return or the statement for four consecutive months or more.**

# DELETED EXPRESSIONS

**default surcharge**

**employee**

**financial year**

**Fiscal law**

**Unregistered**

**Regulations**

**Officer**

**Director General**

## **TAXABLE SERVICE** **[SECTION 3]**

**Services mentioned in the first schedule not to be considered exhaustive.**

**Services mentioned in the Second Schedule shall be taxable services regardless of whether or not they are included in the first schedule.**

# **REVERSE CHARGE** **[SECTION 4]**

**The deduction of tax shall only be made by a person who is registered under this Act as a withholding agent.**

**In case of incoming international calls in the province, the telecommunication companies in Pakistan are now required to pay tax on reverse charge basis to the extent of their share of charges received from abroad.**

**The telecommunication companies and their local representatives are to be considered recipients of service for this purpose.**

# **ECONOMIC ACTIVITY** **[SECTION 5]**

**Scope of the term 'economic activity' is enhanced to include provision of immovable property by way of lease, rent, license or other similar arrangement.**

**'commencement' is to include origination of a service by its provider and the term 'termination' includes the consumption or enjoyment of a service by its recipient**

**excludes a sovereign or core function of the State, performed by the Federal Government or any other public company from the definition of economic activity.**

# **VALUE OF TAXABLE SERVICE** **[SECTION 6]**

**Value of service shall also include open market price where the services are provided for no consideration or at a consideration that is lower than the one provided under normal circumstances.**

**Value of supply MINUS discounts as per normal business practices if shown on invoice**



## **PROVISION OF SERVICES OVER A PERIOD OF TIME** **[SECTION 8]**

Service provided on daily basis where payment thereof is received by the end of a calendar month is to be treated as single service for the purposes of accounting, invoicing, payment of tax and declaration.

# **SCOPE OF TAX AND ALLIED MATTERS**

## **[SECTION 9]**

**Government is empowered to issue notification for charging, levying and collection of tax at such higher, lower, fixed or special rate as it may impose either on its own motion or on the recommendation of the Policy Board**

**Policy Board with the prior approval of the Government may notify such conditions, restrictions, limitations or otherwise fix the limit or threshold of annual turnover of any service provided by any person.**

**Policy Board is also empowered to prescribe condition under which a particular service can be provided by a person from his place of business in KP.**

## **PERSONS LIABLE TO PAY TAX** **[SECTION 10]**

Policy Board is empowered to issue notification and specify the liability to pay tax on any person, other than service provider or service recipient.

# **EXEMPTIONS** **[SECTION 11]**

**Powers to exempt any taxable service, service or class of persons, recipient of recipients of services have been delegated to the Policy Board.**

**The powers to issue notification for an exemption with such condition, restrictions or limitations mentioned in the notification in compliance to any commitment of FG or Government either under any international convention, protocol, treaty or agreement or under any arrangement for foreign grant-in-aid assistance after concurrence from the Finance Deptt of the Government are now vested with the Management Committee.**

# **POWER TO AMEND THE SECOND SCHEDULE** **[SECTION 12]**

Government is empowered to notify on its own or on the recommendation of policy board to add, delete or amend any entry of the second schedule without any cap of maximum rate in contrast to the repealed provisions.

# **SPECIAL PROCEDURE AND WITHHOLDING PROVISIONS** **[SECTION 14]**

Policy board is empowered to prescribe special procedure for the payment of tax, registration, bookkeeping, invoicing or billing requirements, returns and other related matters in respect of any service or class of services alongwith the power to require any person or class of persons to act as withholding agent within such time and manner as it may specify in the notification.

Where an individual is making payment on the behalf of withholding agent, he is personally responsible to withhold and deposit the tax due and failure to do shall attract default surcharge and penalty.

# **INPUT TAX CREDIT NOT ALLOWED** **[SECTION 17]**

**Provisions relating to restriction on input tax adjustment have been introduced in the Act which were earlier contained in the allied regulations with following additions:**

- **Where the services, provided by a person, are chargeable to a rate of tax entitled to input tax adjustment, the input tax adjustment shall be admissible in respect of the tax paid on the inputs, otherwise taxed on high rate, only to the extent, not exceeding standard rate of the tax regime to which the input relates**
- **The services or goods for which the amount of consideration is not paid from the business bank account of the recipient in the business bank account of the service provider or supplier of goods as the case may be**



# **STANDARD OR GENERAL TAX RATE APPLICATION CHOICE** **(SECTION 18)**

**A registered person providing services taxable at reduced rate may opt to pay sales tax at standard rate and claim input tax adjustment after seeking approval from the Management Committee**

**A company may opt to operate under standard rate system on intimation to the Management Committee at least one month in advance.**

**the company shall not be entitled to revert back to the reduced rate without prior approval from the Management Committee.**

# **REFUND** **[SECTION 19]**

Claim of refund of tax paid or overpaid through inadvertence, error, misconstruction or refund on account of input tax adjustment, not claimed within relevant tax period and refund which has become due on account of any decision or judgment of any officer of the authority, appellate tribunal or court with certain restrictions. the manner and mode of payment of refund is to be prescribed by the government.

# **TIME, MANNER AND MODE OF PAYMENT** **(SECTION 21)**

**In case of a withholding agent, the time and manner of payment will be prescribed by the Policy Board through regulations.**

**Tax due on taxable services shall be paid by any of the following modes and instruments;**

- **through deposit in a bank designated by the Management Committee;**
- **through the Alternate Delivery Channel**
- **through such other mode and manner as may be specified by the Management Committee.**

# **SALE OR TRANSFER OF OWNERSHIP OF A BUSINESS AS AN ONGOING CONCERN [SECTION 23]**

Extending application thereof to sale or transfer of business providing taxable services as an ongoing concern by a registered person to a non-registered person where the registered person is required to pay tax on services provided by him and where such tax remains unpaid it shall be the first charge on the assets of the business and will be payable by the transferee of business.

## **ASSESSMENT OF TAX AND RECOVERY OF TAX NOT / SHORT LEVIED** **[SECTION 27]**

- For computation of period of limitation for passing an order after issuance of show cause notice, exclusion on account of adjournment has been restricted upto 45 days.
- Proceedings for imposition of penalty and default surcharge are allowed in case where no tax is due but return is not filed or filed after due date.

# **ASSESSMENT GIVING EFFECT TO AN ORDER** **[SECTION 28]**

For giving appeal effect to an appellate order, enabling provisions are introduced to give such effect within one year from the end of the financial year in which the appellate order is served. However, one year time limit will not apply if reference or leave to appeal has been filed against the appellate order remanding the matter for de novo consideration.

# **REGISTRATION AND APPLICATION FOR REGISTRATION** **(SECTION 29)**

**A withholding agent will now be considered as a registered person under the KPK Act**

**The Policy Board may require any person, engaged in providing only exempt services, to get registered under the KPK Act and file return.**

**The person will be considered as registered, if his tax profile is available on the website.**

**The person required to be registered shall apply for registration not later than 15 days, before the day the person becomes liable to be registered.**

**If the Management Committee is satisfied that the person is liable to get registered, the Management Committee, or the Authorized officer shall within 15 days;**

- **Register the person;**
- **Notify the person of registration, the day on which registration takes effect and the registration number issued to the person.**

**If the person is not required to be registered but has applied for registration, the Management Committee or the authorized officer shall notify such person within 15 days about the decision of the application. If it is decided to register the person, the notification shall state the date on which the registration will take effect and the registration number will be issued to such person. If the application for registration is rejected, the person shall be notified for such decision and his right to appeal against decision shall be outlined.**



# **COMPULSORY REGISTRATION** **(SECTION 31)**

**The power to register any person compulsorily has been delegated to the Management Committee**

**Every order for compulsory registration can be contested by filing an appeal.**

**Requirements of compulsory registration shall also be applicable to the persons who are required to withhold and pay tax.**

## **SUSPENSION OF REGISTRATION** **(SECTION 32)**

There is no change in the process of suspension of registration. However, the powers have been vested to the management committee.

## **DE-REGISTRATION** **(SECTION 33)**

The power to de-register any registered person has also been vested to the management committee.

## **ISSUANCE OF TAX INVOICE** **(SECTION 34)**

- The particulars of a valid sales tax invoice have been updated.
- Applicable rate of tax is also required to be mentioned on the sales tax invoice issued by a registered person.

# **RECORDS** **[SECTION 35]**

**record of taxable services received indicating specified particulars.**

**record of purchases, including imports of goods and services, containing import documents, if any, purchase invoices and proof of payment for the purchase thereof.**

**particulars of bank account(s), intended to be used for the purposes of business involving providing or rendering services, including purchases of goods and services used as inputs.**

# **AUDIT PROCEEDINGS**

## **[SECTION 37]**

**An authorized officer is empowered to conduct an audit of a registered person based on information furnished or required by the said officer from a registered person.**

**Enabling provision for conduct of audit electronically through video link or any other facility is added.**

**The time limit to respond to an audit observation report issued by the authorized officer is stipulated as within such period as specified in the audit report.**

## **SPECIAL AUDIT** **[SECTION 38]**

- The management committee subject to the approval of the policy board is empowered to appoint a special audit panel consisting of accountants or persons as may be specified for conducting special audit of records of any registered person or even a class of registered persons.
- Every such special panel is to be headed and supervised by a nominated officer of the authority.

## **RETURN** **[SECTION 39]**

Separate entries in respect of each portion of tax period consequent to change in tax rate are required in the return.



# **POWERS OF ADJUDICATION** **[SECTION 45]**

- Recovery of tax not levied or short levied is to be included in the pecuniary jurisdiction.
- The management committee is now required to specify the system of adjudication.

# **POWERS OF ADJUDICATION OF THE OFFICERS. FINANCIAL LIMITS FOR JURISDICTION OF THE OFFICERS**

<b>Designation</b>	<b>Earlier limit</b>	<b>New limit</b>
<b>Additional Collector</b>	<b>No limit</b>	<b>Unchanged</b>
<b>Deputy Collector</b>	<b>PKR 1,000,001 to PKR 2,500,000</b>	<b>PKR 2,500,001 to PKR 5,000,000</b>
<b>Assistant Collector</b>	<b>PKR 1 to PKR 1,000,000</b>	<b>PKR 1 to PKR 2,500,000</b>

# TERM OF APPOINTMENT OF SPECIAL JUDGE [SECTION 46]

## Old term

- **5 years**

## New term

- **Extendable period of 03 years.**

**PARALLEL PROCEEDINGS BEFORE SPECIAL JUDGE  
AND OFFICERS OF THE AUTHORITY  
[SECTION 48]**

Officer of the authority shall not be restricted from undertaking and completing the adjudicatory process or proceedings for the purpose of determination and assessment of tax, including default surcharge and penalties in any case subjudice for trial or any other proceedings before the special judge.

## **DIRECTION FOR WITHDRAWAL OF PROSECUTION BY SPECIAL JUDGE** **[SECTION 51]**

Prosecution under the act before the special judge may only be withdrawn by the management committee with the approval of policy board or, as the case may be, on the direction of the Government.

# **PENALTIES [SECTION 53]**

Before signing the order, an officer of the authority is required to send the case to the special judge for trial if the accused person ought to receive a more severe punishment than the officer is empowered, or the case is on which ought to be tried by the special judge.

<b><u>Offenses</u></b>	<b><u>Punishments &amp; penalties</u></b>
<b>Where a person who is required to apply for registration under this act fails to make an application for registration before providing any taxable services</b>	<b>The penalty is raised from Rs 10,000 to Rs 100,000 and in case of non-compliance of compulsory registration the minimum penalty to be raised from Rs 10,000 to Rs 200,000</b>
<b>Where a person fails to furnish the return within due date</b>	<b>The penalty for such person is reduced from Rs 100,000 to Rs 90,000. If such person files the return within 10 days, the penalty is increased from Rs 100 to Rs 300 for each day</b>
<b>Where a person fails to issue tax invoice.</b>	<b>The penalty will be higher of Rs 100,000 or 5% in contrast with earlier penalty of 3%</b>
<b>Where a person violates any embargo placed on providing of service or services in connection with recovery of tax</b>	<b>Penalty is increased from Rs 25,000 to Rs 50,000</b>

## **Offenses**

## **Punishments & penalties**

**Where a person obstructs any officer of the authority in performance of official duties under the law**

**Penalty is increased from Rs 25,000 to Rs 50,000**

**Where a person fails to fulfil any of the conditions, limitations, or restrictions prescribed in a notification issued under any of the provisions of this act or the rules made thereunder, or where a person contrivance any provision of this act or rules made thereunder for which no penalty has specifically been provided in this section**

**Penalty is increased from Rs 5,000 to Rs 25,000**

**Where an individual who during the course of business making the payment on behalf of withholding agent but fails to withhold or deposit the due tax**

**Penalty at higher of Rs 25,000 or 5% of the amount involved**

**Where any person intentionally, deliberately or fraudulently intervenes, alters or damages any electronically filed invoices mechanism or system prescribed or specified for the purpose of avoiding correct payment of due tax**

**(i) Penalty at higher of Rs 100,000 or 100% of the loss caused or believed to be caused to the tax revenue**

**(ii) imprisonment for a term which may extend to three years or with fine equal to loss caused to the tax revenue or both**



## **Offenses**

## **Punishments & penalties**

**Any person who knowingly deliberately, intentionally or fraudulently:**

- (a) submits a fall fake untrue or forged documents; or**
- (b) destroys, alter, mutilates or falsifies the records including a tax invoice ;**
- (c) makes a false statement, false declaration, false representation, or false personification, or gives any false data or information; or**
- (d) commits, causes to commit or attempts to commit tax fraud, or abets or connives in the commission of tax fraud equals to one hundred thousand rupees or more.**

**The penalty is raised from Rs 25,000 to Rs 100,000**

**Where any person;**

- (a) Fails to make the payment of consideration for goods and services from the business bank account to the service provider or the supplier of the goods, as the case may be; or**
- (b) Fails to receive the payment of consideration for services in business bank account of service provider, as the case may be**

**(i) Penalty at higher of Rs. 50,000 or 10% of the amount of consideration or transection involved**

**(ii) upon conviction by the Special Judge, imprisonment for term which may extend to 6 months or with fine or with fine not exceeding Rs 20,000 or both**

# **PENALTIES OMITTED**

**Failure to produce any record or furnish any information upon receipt of a notice**

**Denial or obstruction the access to the business premises where record is kept**

**Commits tax fraud or abets in such commission amounting to Rs 20,000 or more**

# **DEFAULT SURCHARGE** **[SECTION 54]**

**Amount of tax or charge or the amount of refund erroneously made;**

- **12% per annum instead of interbank rate + 3% per annum**  
**12% per annum instead of interbank rate + 3% per annum**

**Default is on the account of tax fraud**

- **24% per annum**

**For calculation of default surcharge in the case of inadmissible input tax credit or refund, the period of default is reckoned from the date of adjustment of such credit or, as the case may be, refund received.**

**Period of default will be one month for period less than a month.**

## **POWER TO SUMMON PERSONS** **[SECTION 57]**

An officer not below the rank of assistant collector of the authority has been designated as authorized officer to summon persons to give attendance and produce documents.

**ACCESS TO PREMISES, STOCKS, ACCOUNTS,  
RECORD AND INVENTORY STATEMENT**  
**[SECTION 60]**

**An officer not below the rank of Assistant Collector has been designated as authorized officer for access to premises, stocks, accounts and records.**

**Custody of records and material etc., is required to be documented into an inventory statement signed in prescribed manner**

**SEARCHES UNDER WARRANT AND SEALING**  
**THE BUSINESS PREMISES**  
**[SECTION 62]**

An officer of the authority not below the rank of the collector is empowered to seal the business premises of a person failed to comply with his obligations under the act or the rules by an order, in writing after giving a notice in writing to such effect.

## **MONITORING OR TRACKING BY ELECTRONIC OR OTHER MEANS** **[SECTION 64]**

From the date as may be specified by the management committee, the person, providing or rendering taxable service, shall compulsorily use electronic means and systems, including fiscal cash registers, for issuance of tax invoice under the e-invoicing system.



# **FILING OF APPLICATION FOR REVISION OF DECISION OR ORDER** **[SECTION 65]**

## **Old limit**

- 90 days of the date on which such order was served on the person.

## **New limit**

- 180 days of the date on which such order was served on the person.

# **APPEALS AND OTHER REMEDIES – COLLECTOR (APPEALS)** **[SECTION 66]**

**Following orders will be appealable now:**

- **Order passed for assessment of tax and recovery of tax not levied or short levied.**
- **Order passed for rejection of an application for registration.**
- **Order passed for compulsory registration.**

# **DONE AWAY WITH**

**Requirement to transfer an appeal to the Appellate Tribunal where no order is passed by the Collector (Appeal) within 180 days from the end of the month in which the appeal was lodged.**

**Requirements for Collector (Appeals) to provide an opportunity to appellant to show cause against the increase in tax liability by Collector (Appeals)**

# **APPEALS AND OTHER REMEDIES – APPELLATE TRIBUNAL** **[SECTION 69]**

**Following orders are now appealable before the Appellate Tribunal**

- **Order passed by the Collector under**
  - **Section 27 of the proposed Act, for assessment of tax and recovery of tax not or short levied.**
  - **Section 62(3) for sealing of business premises**
  - **any provisions of the proposed Act.**

## **Order passed by Management Committee under**

- **Section 29(8) of the proposed Act, for rejection of application for registration**
- **Section 31(1) for compulsory registration**
- **Section 32(3) for suspension of registration**
- **Section 33(4) for rejection of an application for de-registration**
- **Section 65 for revision.**

# **RECOVERY OF ARREARS**

## **[SECTION 74]**

**The office of Authority is empowered to issue a show cause notice for imposition of personal penalty, not exceeding Rs 100,000 to:**

- **any person who holds or may subsequently hold money for or on account of the person in default deliberately avoids compliance to a notice of recovery issued to such person. However, Government departments and other public sector non-commercial institutions are exempted from issuance of said show cause notice for imposition of penalty.**
- **The officer in charge of the bank branch concerned if such officer declines or otherwise is found involved in any manipulation with the defaulter upon receipt of recovery notice.**

**The officer of Authority can recover the tax through direct or real time collection of sale proceeds of services by appointing an official receiver for direct deposit thereof with Government under relevant head of account.**

**The officer of Authority is vested with same powers which under the Code of Civil Procedure, 1908 a Civil Court has for the purpose of recovery of an amount due under a decree.**

# **SECTION - 75**

**A situation where a registered person makes short payment of tax due along with return. Such short-paid amount of tax due can be recovered along with default surcharge from such person by bank account attachment without giving a show cause notice.**

**However, penalty imposition is enabled subject to issuance of show cause notice. These provisions have been given overriding effect over any provisions of the Act.**



# **POWER TO RESTRAIN CERTAIN AUTHORITIES** **[SECTION 82]**

Management committee is empowered to require other regulators, authorities to refrain them from issuing or renewing licenses of persons engaged in taxable services unless the person submits evidence that he is registered with KAPRA.

# **SECOND SCHEDULE**

**Services provided by laboratories including technical services relating to X-rays, CT scan, MRI, Ultrasound, Echo etc. or other such laboratories.**

## **Tax rate**

**New rate - 10%**

**Old rate - 5%**

# HOW TO APPROACH GCA

<b>Media</b>	<b>Contact Details</b>
<b>Email</b>	<b><u><a href="mailto:gcaconsultants@gmail.com">gcaconsultants@gmail.com</a></u> &amp; <b><u><a href="mailto:gcaofficial@gmail.com">gcaofficial@gmail.com</a></u></b></b>
<b>Website</b>	<b><u><a href="http://www.gcaofficial.weebly.com">www.gcaofficial.weebly.com</a></u></b>
<b>Facebook - Page</b>	<b><u><a href="https://www.facebook.com/GCAofficial/">https://www.facebook.com/GCAofficial/</a></u></b>
<b>Instagram</b>	<b><u><a href="https://www.instagram.com/gca.consultants.official/?hl=en">https://www.instagram.com/gca.consultants.official/?hl=en</a></u></b>

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