THE AUTHORITY FOR ADVANCE RULINGS IN KARNATAKA GOODS AND SERVICES TAX VANIJYA THERIGE KARYALAYA, KALIDASA ROAD GANDHINAGAR, BENGALURU – 560 009

F. No. KAR.AAR 39/2026
Order No. KAR.ADRG 39/2026 **Date: 06.07.2026**

Present:

1. **Shri. Kalyanam Rajesh Rama Rao**
Additional Commissioner of Customs & Indirect Taxes .... Member (**Central**)

2. **Shri. Sivakumar S Itagi**
Additional Commissioner of Commercial Taxes .... Member (**State**)

1	Name and address of the applicant	M/s Quinta Systems Pvt. Ltd., # 3rd Floor, 7/3, Jeet Dynasty, Swamy Vivekananda Road, Nagavarapalya, Bengaluru Urban, Karnataka, 560093.
2	GSTIN or User ID	29AAACQ4305K1ZD
3	Date of filing of Form GST ARA-01 (ARN date)	12.07.2023
4	Represented by	--Not Applicable--
5.	Jurisdictional Authority – Centre	The Commissioner of Central Tax, Bengaluru East GST Commissionerate.
6	Jurisdictional Authority – State	ACCT, LGSTO 035-Bengaluru
7	Whether the payment of fees discharged and if yes, the amount and CIN	Yes, discharged fee of Rs.5,000/- under CGST Act, 2017 and Rs.5,000/- under KGST Act, 2017 vide Electronic Cash Ledger Debit Entry No. DC2907230047450 Dated 12.07.2023.

ORDER UNDER SECTION 98(2) OF THE CGST ACT, 2017 & UNDER SECTION 98(2) OF THE KGST ACT, 2017

M/s Quinta Systems Pvt. Ltd., (hereinafter referred to as the "Applicant"), having GSTIN 29AAACQ4305K1ZD and principal place of business at # 3rd Floor, 7/3, Jeet Dynasty, Swamy Vivekananda Road, Nagavarapalya, Bengaluru Urban, Karnataka, 560093, filed an application for Advance Ruling under Section 97 of the Central Goods and Services Tax Act, 2017 read with Rule 104 of the Central Goods and Services Tax Rules, 2017 and the corresponding provisions of the Karnataka Goods and Services Tax Act, 2017, in FORM GST ARA-01.

2. The Applicant is engaged in the trading of computer hardware & software and in software development. The Applicant submits that it primarily procures computer hardware, such as Point of Sale (POS) machines, barcode scanners and printers, from its parent company, M/s Posiflex Technology (India) Pvt. Ltd., and supplies the same on a pan-India basis, including to SEZ units, by issuing the requisite e-way bills and e-invoices, after adding a reasonable profit margin.

Authority For Advance Ruling ★ Karnataka, Bengaluru ★

3. The Applicant further submits that, with a view to expanding its business operations, it proposes to commence travel agency services under the brand name "Qugo" by entering into arrangements with airlines, boarding and lodging service providers, and travel service aggregators for providing Business-to-Business (B2B) travel-related services.

4. In this regard, the Applicant has raised the following questions:-

a) *For the transaction values for Air Fare charges and hotel bookings whether we need to book the revenue as Actual Flight Charges (or hotel Charges) + Commission = as our revenue or we need to book the commission only as our revenue?*

b) *Due to competency of the business we need to provide the discounts to customers, are there any GST Taxes implications are there?*

c) *What is the HSN code for Air Ticket Booking Commission, Tax implications i.e. Tariff rate?*

d) *What is the HSN code for hotel (boarding and lodging services) Booking commission, Tax implications i.e. Tariff rate?*

e) *What is the HSN Code for Holiday packages, Tax Tariff implications i.e. Tariff rate and are we eligible to take Input tax Credit (ITC) against our corresponding bookings with hotel bookings, flight charges and other ancillary services partners.*

f) *What is the GST implications overseas sales of hotel booking, Travel ticket Holiday packages?*

g) *In aforesaid business any RCM are applicable?*

h) *Since we will be using common GSTIN for both business vertical i.e. trading the computers and peripherals and travelling business, can we generalize the input credits setoffs to both the line of business or we have to consider them separately?*

i) *Any GST TCS required to deduct to our travel vendors?*

5. Subsequently, the Applicant, vide letter dated **01.07.2026**, requested withdrawal of the present Advance Ruling application, stating that the business vertical in respect of which the Advance Ruling had been sought had been discontinued with effect from 31.03.2024.

6. In view of the above, we pass the following,

<u>R U L I N G</u>

The application filed by the applicant for advance ruling is disposed off as withdrawn.

(Kalyanam Rajesh Rama Rao)	**(Sivakumar S Itagi)**
Member	Member
MEMBER	MEMBER
Karnataka Advance Ruling Authority	Karnataka Advance Ruling Authority
Bengaluru - 560 009	Bengaluru - 560 009

Place: Bengaluru,
Date: 06.07.2026

Authority For Advance Ruling ★ Karnataka, Bengaluru ★

To,
The applicant

Copy to:

1. The Principal Chief Commissioner of Central Tax, Bangalore Zone, Karnataka.
2. The Commissioner of Commercial Taxes, Karnataka, Bengaluru.
3. The Commissioner of Central Tax, Bengaluru East GST Commissionerate.
4. The Assistant Commissioner, LGSTO 035- Bengaluru.
5. Officer Folder.

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