GOVERNMENT OF INDIA MINISTRY OF FINANCE
INCOME TAX DEPARTMENT

OFFICE OF THE INCOME TAX OFFICER, CIRCLE 1(1), DEMO NAGAR

Demo Aayakar Bhavan, Plot C-1, Sector 4, Demo Nagar 000001

To,
SURYANETRA COMPONENTS PRIVATE LIMITED
(Synthetic Demonstration Entity)
Unit 14, Demo Industrial Estate, Sector 7
Demo Nagar 000001

PAN: PAN-DEMO-0001
A.Y.: 2024-25
Dated: 20/02/2026
Proceeding Ref.: DEMO/REASSMT/2026/001

DIN & Order No.: ITBA/DEMO/F/148A(3)/2025-26/DIN-DEMO-0003(1)

Name of the assessee	:	Suryanetra Components Private Limited - Synthetic Demonstration Entity
Address of the assessee	:	Unit 14, Demo Industrial Estate, Sector 7, Demo Nagar 000001
E-mail of the assessee	:	accounts@suryanetra-demo.invalid
Permanent Account Number	:	PAN-DEMO-0001
Assessment year	:	2024-25
Status	:	COMPANY
Resident / Not Ordinarily Resident / Non-Resident	:	Resident
Date of order	:	20/02/2026
Name and designation of the specified authority	:	Additional Commissioner of Income-tax, Range 1, Demo Nagar
Specified authority approval date	:	19/02/2026
Specified authority approval reference	:	DEMO/APPROVAL/151/2026/017

Order under sub-section (3) of section 148A of the Income-tax Act, 1961

1. Information was received in this case for the financial year 2023-24 relevant to the assessment year 2024-25 suggesting that income chargeable to tax has escaped assessment, in that a credit of Rs. 32,00,000/- recorded in the books of account of the assessee under the head ‘unsecured loans’, stated to have been received from Tamrasetu Tradecraft Private Limited - Synthetic Demonstration Entity, was not established as to its nature and source.

2. Accordingly, an opportunity of being heard was afforded to the assessee under section 148A(1) of the Act vide notice bearing DIN ITBA/DEMO/F/148A(1)/2025-26/DIN-DEMO-0001(1) dated 06/01/2026, requiring the assessee to show cause on or before 21/01/2026 as to why a notice under section 148 of the Act should not be issued.

3. In response to the said notice, the assessee furnished a reply dated 12/01/2026 through its authorised representative. The relevant portion of the reply is reproduced as under:

> “The credit of Rs. 32,00,000/- referred to in the Annexure to your notice is an unsecured loan received by our clients from the lender during the previous year ended 31st March, 2024 ... A compilation of evidence dated 10 January 2026 is enclosed herewith ... the audited financial statements of the lender for the financial year 2023-24 and the acknowledgement of the lender’s return of income for the assessment year 2024-25 have been called for from the lender but have not been received, and are accordingly not enclosed with this reply.”

4. The reply of the assessee and the material placed on record have been perused and considered. It is seen that the assessee has placed on record a confirmation of account issued by the lender and an extract of its bank statement for part of the previous year. It is, however, seen that the audited financial statements of the lender and the acknowledgement of the lender’s return of income for the assessment year under consideration have not been furnished, and that the bank statement furnished covers the period 01/04/2023 to 30/09/2023 only.

5. In the circumstances, the explanation offered by the assessee as to the nature and source of the credit is not established on the material presently available on record. The submissions of the assessee are matters that fall for examination in the course of assessment proceedings, and nothing stated in this order shall be construed as a finding on the merits of the said credit.

6. On a consideration of the information, the reply of the assessee and the material available on record, I am satisfied that this is a fit case for the issue of a notice under section 148 of the Income-tax Act, 1961 for the assessment year 2024-25.

7. The prior approval of the specified authority for passing this order under section 148A(3) and for the consequent issue of a notice under section 148 of the Act has been obtained from the Additional Commissioner of Income-tax, Range 1, Demo Nagar, in accordance with the provisions of section 148A read with section 151 of the Act, vide approval reference DEMO/APPROVAL/151/2026/017 dated 19 February 2026.

8. Ordered accordingly. Notice under section 148 of the Income-tax Act, 1961 for the assessment year 2024-25 is hereby directed to be issued to the assessee.

(Sd/-)

Income Tax Officer, Circle 1(1), Demo Nagar

(In case the document is digitally signed, please refer to the Digital Signature at the bottom of the page.)

Note: If digitally signed, the date of digital signature may be taken as the date of the document. | Demo Aayakar Bhavan, Plot C-1, Sector 4, Demo Nagar 000001 | E-mail: DEMONAGAR.ITO1.1@INCOMETAX.DEMO.INVALID
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Copy to: The assessee.