

FORM NO. 47
Certificate of an accountant under section 166

Part A: Particulars of the Person

1.	Name:	<i>(refer Note 1)</i>	
2.	Address:	<i>(refer Note 2)</i>	
3.	Permanent Account Number (PAN):		
4.	E-mail Id:		
5.	Contact Number:	Country Code	Number

Certification

I have examined the books of accounts, the documents maintained under the provisions of section 171 and other relevant documents maintained by Mr./Ms./M/s* _____ for the first tax year (TY) _____, second tax year (TY+1) _____, third tax year (TY+2) _____ for giving consent for determination of arm's length price (ALP) per provisions of section 166(9).

I hereby certify the following:

- Assessee has furnished the return of income for the tax years _____ and _____ within the due date specified in section 263(1). [TY and TY+1]
- Assessee has furnished Form No. 48 for tax years _____ and _____ within the time specified in section 172. [TY and TY+1]
- The case of the assessee for the TY, TY+1 and TY+2 period is not covered under the provisions of Chapter XVI-B.
- The transactions in the _____ [auto-filled, TY] for which assessee has exercised the determination of arm's length price as per provisions of section 166(9) are similar to the transactions in _____ [TY+1] and _____ [TY+2] under the provisions of rule 82.
- There has not been any material change in the analysis of the transaction(s) in respect of functions performed, taking into account assets employed and the risks assumed for TY, TY+1 and TY+2.
- There has not been any material change in the business result or holding structure of the Associated Enterprise, or change in the Associated Enterprise in the case of the assessee during TY, TY+1 and TY+2 which impact the transaction or the functions performed, taking into account assets employed and the risks assumed.
- None of the Associated Enterprises relevant to the transactions for which option or options is exercised under section 166(9) is a resident of a jurisdiction which has been notified under section 176.
- There has been no change in the contractual terms of the relevant transactions which explicitly or implicitly laid down how the responsibilities, risks and benefits are to be divided between the parties to the relevant transactions in TY, TY+1 and TY+2.
- The case of the assessee is fit for Transfer Pricing assessment under the provisions of section 166(9).
- The information given by the assessee in the Form No. 46 for TY, TY+1 and TY+2 is accurate and *bona fide*.

Any other information relevant to the option or options exercised by the assessee may be stated below:

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Place:
 Date:

Signature:
 Name of the accountant:
 Designation:
 Membership Number:
 UDIN, if any:
 Name of the Proprietorship/Firm:
 Firm Registration Number:

Notes:

1. The name shall include full name of the person.
2. The address shall include flat/door/building, road/street/block/sector, area/locality, post office, town/city/district, state, country and pin code.
3. This form is to be signed and verified by the person competent to verify the return of income under section 265.
4. *Delete whichever is not applicable.
5. Some of the information in the form would be pre-filled to the extent possible.
6. The amount mentioned in this form is to be filled in rupees unless stated otherwise.