

**MINISTRY OF FINANCE**  
**(Department of Revenue)**  
**(CENTRAL BOARD OF DIRECT TAXES)**

**NOTIFICATION**

New Delhi, the 23rd May, 2014

**INCOME-TAX**

**S.O. 1364(E).**—In exercise of the powers conferred by clause (48) of Section 10 of the Income-tax Act, 1961 (43 of 1961), the Central Government, having regard to the national interest, hereby notifies for the purposes of the said clause—

- (a) M/s. Temad. 28th Km Karaj Makhsoos Road, Iran, as the foreign company;
- (b) Codeine Phosphate as the goods; and
- (c) the Memorandum of Understanding entered into between the Government Opium and Alkaloid Factories (GOAF) and M/s. Temad, Iran on the 21st September, 2013, duly approved by the Central Government, as the agreement:

Provided that the said foreign company shall not engage in any activity in India, other than the receipt of income in India under the agreement aforesaid on account of the sale of Codeine Phosphate.

2. This Notification shall be deemed to have come into effect from the 1st day of April, 2014.

[Notification No. 27/2014, F.No.196/20/2014-I.TA.1]

DEEPSHIKHA SHARMA, Dy. Secy.