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Social Security Newsletter

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Regulatory Updates

Revamp of the Shram Suvidha Portal to promote ease of doing business

The Shram Suvidha portal was launched in October 2014 to consolidate information on labour inspection and its enforcement, leading to transparency and accountability in inspections. Through recent press releases, it has been made clearly evident that the MOLE is taking steps to roll out the upcoming labour codes. One such recent update has been on the launching of the revamped Shram Suvidha Portal by the year-end, to aid in improving the ease of doing business.

The revamped Shram Suvidha Portal would have the following features:

- Leveraging of AI and machine learning to facilitate ease of doing business since this would aid in filing all kinds of registrations and submission of returns that are required under different labour laws.
- Sharing of information among the four labour enforcement agencies - Chief Labour Commissioner (CLC), Directorate General of Mines Safety (DGMS), Employees' Provident Fund Organisation (EPFO) and Employees' State Insurance Corporation (ESIC), thus facilitating effective enforcement of labour laws on wage, job and social security for workers.

The new labour codes have provisions for single returns, single licences, and single registration forms. So, whenever the new codes are implemented, having the necessary infrastructure to implement the provisions would help businesses in compliance.

The ministry is also working to upgrade the Samadhan portal used to resolve the grievances of workers, trade unions and management on issues under labour laws like illegal termination, delayed payments, unauthorized deduction, minimum wage, and overtime allowance, among others. The Samadhan portal was launched in September 2020 and, according to government data, nearly 63,000 complaints have been filed till June 2024, out of which 45,600 complaints have been disposed of.

Impact:

Earlier in July, while presenting the Union Budget, Finance Minister Nirmala Sitharaman announced that as part of labour-related reforms, the e-shram portal and Samadhan portals would be revamped, as a step to enhance ease of compliance for industry and trade. This would make it much easier for businesses to use and also help us in enforcing the law.

The idea of revamping the e-shram portal is to leverage data and help businesses in complying with the different provisions of the laws so that they can better utilise their resources.



Press release on registration of gig/platform workers on the E-shram portal and extension of welfare schemes

Press Release¹ advises aggregators to register on the e-Shram portal and onboard their gig and platform workers. The Central Government with the successful completion of the API testing of integration with the e-Shram portal including that by a few aggregators, has encouraged the remaining aggregators to complete the API testing in a time-bound manner and onboard themselves as well as the platform workers engaged by them on the e-Shram portal.

Additional highlights of the Press Release are as below:

- The guidelines include the definitions of 'Aggregator', 'Platform work', 'Platform worker'
- Outline of the roles and responsibilities of aggregators such as registration of the platform workers engaged by them on the e-Shram Portal and regular upload of the workers' details of their monthly engagement. This would include the number of days worked and amount paid or payable for the month.
- The platform workers will receive a Universal Account Number (UAN) upon registration which can be electronically linked in the database of the aggregator to facilitate the portability of workers.
- Aggregators must also intimate the exit of any platform worker in the e-Shram portal to maintain accurate records.
- The Ministry has also issued Standard Operating Procedures (SOP) for the online on-boarding of platform aggregators on e-Shram Portal which covers the following.
 - To assist the aggregators and platform workers, a toll-free helpline (14434) has also been set up to disseminate information, facilitate registration, and resolve any technical issues encountered during onboarding or uploading data.
- As regards to the above, on 18 September 2024, the Union Minister of Labour & Employment, Dr Mansukh Mandaviya, chaired a meeting with platform aggregators in New Delhi emphasising the need for registration of their workers on the e-Shram portal. The key takeaways from the meeting are as follows:
 - Formation of a dedicated committee to deliberate on key issues for establishing a robust social security framework for Gig and Platform Workers
 - Target to onboard aggregators and platform workers on the e-Shram Portal within the next three months.
 - Aggregators to list their job vacancies on the National Career Service (NCS) portal.

The Government has introduced 10 welfare schemes on the e-shram portal. With the onboarding of these 10 schemes, the Government intends to extend the benefits of all Government schemes to 300 million unorganised workers registered on the portal.

The 10 schemes or benefits now available through the portal includes ration card, PM Street Vendor's AtmaNirbhar Nidhi (PM SVANidhi), Mahatma Gandhi National Rural Employment Guarantee (MGNREGA), Pradhan Mantri Awas Yojana Gramin (PMAY-G), PMAY- Urban, National Career Service portal, PM Shram Yogi Maandhan, National Disability Pension, National Widow Pension, PM Matisya Sampada Yojana (PMMSY) and Skill India Digital Hub (SIDH). The e-shram portal would serve as a central database of existing schemes and their respective beneficiaries.

¹ September 16, 2024



Impact:

By encouraging the aggregators to register and ensure registration of their respective platform/gig workers, the Government is actively taking steps to ensure social security and welfare benefits are extended to those in non-traditional employer-employee relationships. A portal with a procedure set in place for registration will create a formal social security ecosystem for the platform workers and provide them with access to various social welfare schemes.

Further, the onboarding of these schemes on the e-Shram portal would help in making it a 'one-stop solution' or single window. This would enable unorganised workers to get access to all eligible schemes or benefits and help the government ensure no potential beneficiary is left out.

These are collaborative efforts between the government and digital platforms which would help in creating a sustainable social security framework for India's gig workforce.

Ministry of Labour & Employment conducts several consultation meetings on upcoming Employment Linked Incentive Schemes

As mentioned in the Budget, the MoLE is looking to fast-track the introduction of the employment-linked incentive schemes. In light of the same, the MoLE has been holding several consultation meetings throughout the month of September with stakeholders, in order to roll out the final schemes at the earliest.

So far, the labour ministry has held 15 meetings with industry, employer organisations, employee organisations, different ministries of the government, states & UT officials, Employees' Provident Fund Organisation (EPFO) officials, research & academic institutions, and multilateral organisations, as per sources. The international organisations who are providing inputs to MoLE stated that the focus must be on the ease of implementation and avoidance of complexity which would encourage the industry and promotion participation. Further, the multilateral organisations are also extending their support by providing data of similar schemes being implemented in other countries, which can be used as a reference for framing guidelines.

Impact:

Once these schemes are put into effect, employers may consider availing benefits under schemes A, B or C by the hiring of fresh employees in their organisations and creating a narrative of promoting skilling, training and employment in India.

Adoption of BRICS Labour and Employment Ministerial Declaration

The BRICS Labour & Employment Ministerial Declaration² has been adopted wherein 4 priority issues have been extensively discussed. The priority areas are:

² September 10, 2024



- 1) Development of a system of vocational guidance, skills training and lifelong professional education for the entire population.
- 2) Platform employment and the challenges of its regulation.
- 3) Ensuring the safety and promotion of a healthy working environment and social protection for workers
- 4) Development of social support for the BRICS countries.

India stated that the coverage of gig and platform workers is ongoing with the efforts being put into the Code on Social Security, 2020.

Impact:

The adoption of the BRICS Declaration is a step in the right direction where discussions and considerations are being given to imparting of skills, youth training, promoting occupational health and safety at the workplace and extending coverage of the social security to those outside of the traditional employer-employee relationships.

Hike in PF withdrawal limit to INR 1,00,000

The government has now eased regulations³ and has hiked the one-time withdrawal limit from provident fund (PF) accounts. Besides, it has also relaxed the rules, allowing employees to leave their jobs within six months of starting a new position. This has been done with the intention to provide enhanced financial flexibility to contributors during times of immediate requirement.

The Labour Minister also announced the introduction of a new digital framework that simplifies the withdrawal process, ensuring faster access to funds.

Impact:

Provident funds, such as EPFO, play a crucial role in providing retirement income for more than 10 million employees in the organized sector. These funds serve as the primary source of lifetime savings for working individuals, particularly the salaried middle class. Withdrawal from PF is typically towards specific needs such as medical treatment, education, or family needs. Early access and an increase in cap specifically for medical reasons are welcome changes.

³September 17, 2024



Increase in VDA for workers in informal sectors

The Union Government has increased⁴ the rate of minimum wages for workers employed in informal sectors including construction, mining and agriculture from the month of October. The Government revises the wages twice a year, in April and October.

This would be brought into effect through an adjustment to the Variable Dearness Allowance ('VDA'). The Government hopes to help workers cope with the rising living expenses, as seen in the rise in Consumer Price Index ('CPI') for industrial workers. This hike is expected to increase the minimum wage to INR 783 for unskilled workers, INR 868 for semi-skilled workers and INR 1035 for highly skilled workers.

Impact:

The increase in VDA would help industry workers manage their living expenses, considering the rise in costs. The increase in VDA would imply that employers would need to realign the components within the salary to ensure that the VDA component meets the new VDA limit.

⁴ September 26, 2024



Launch of the NPS Vatsalya Scheme

Finance Minister Smt. Nirmala Sitharaman launched⁵ the National Pension System Vatsalya (NPS Vatsalya)- 'a pension scheme for minors', as announced by the Finance Minister on 23 July 2024, in her Union Budget 2024-25 speech.

- All minor citizens (age below 18 years) are eligible for the scheme.
- Account can be opened in the name of the minor and operated by a parent or guardian. Minor will be the beneficiary.
- Permanent Retirement Account Number (PRAN) to be issued in the name of a minor.
- The scheme can be opened through various points of presence regulated by Pension Fund Regulatory Authority of India (PFRDA) such as major banks, India Post, Pension Funds and Online platform (e-NPS).
- Minimum annual contribution to be made amounting to INR 1,000 p.a. There is no limit on the maximum contribution.
- In case of withdrawal before 18 years of age: Partial withdrawal up to 25% of contribution on declaration basis, is allowed after lock-in-period of 3 years for education, specified illness and disability for maximum three times.
- Exit upon attainment of 18 years: — If the accumulated corpus is equal to or greater than INR 250,000: At least 80% of the balance is to be utilised for the purchase of annuity and the remaining balance in a lump sum. — If the accumulated corpus is less than INR 250,000: Option to withdraw entire balance as lump sum • In case of death of minor: Entire accumulated Corpus is returned to the guardian.
- Upon attainment of 18 years of age, there is an option to seamlessly shift to NPS Tier – I (All citizen) account. Fresh KYC of the minor required within 3 months from date of attaining 18 years of age. Upon transitioning, the features, benefits and exit norms of NPS-Tier I for All Citizen Model shall be applicable.

Impact:

NPS Vatsalya scheme encourages a culture of early saving and investment among young subscribers, promoting financial discipline from a young age. The scheme has restrictions on withdrawal and primarily focuses on the need to save for retirement, from a young age. Accordingly, future cash flow requirements for various short term/ long term goals (e.g. higher education, specified illness, disability etc.) may also be kept in mind while investing in this scheme.

Further, one needs to wait for the official clarification/ gazette notification on the tax benefits under NPS Vatsalya scheme.



EPFO releases manual for Inspector-cum-Facilitator

The Employees' Provident Fund Organisation ('EPFO') has revamped and updated⁶ the Inspector Manual for Inspector-cum-Facilitator. As per this manual notified recently, the main role of Inspector-cum-facilitator is to liaise with employers to ensure compliance with the provisions of the Employees' Provident Fund and Miscellaneous Provisions Act, 1952 ('EPF Act').

The EPFO relies on PF Inspectors to enforce compliance under the EPF Act. The EPF Act enables the Inspectors to require establishments to furnish information, search the premises of the establishment, call for records, make copies of records and other powers as provided in the respective schemes.

Recently, the EPFO has released several manual / Standard Operating Procedure ('SOP') documents (such as Management and Regulation of EPF Exempted Establishments, Joint Declaration for updating member profile details). These manuals/documents clearly lay down the steps to be undertaken by the employees/ establishments thereby clearing the ambiguity while minimising delays. The new "Manual for Inspectors-cum-Facilitators" supersedes the current manual for PF inspectors and is a step in this direction. The document has been prepared keeping in mind changes in terms of workforce (International Workers), coverage aspects, grievance resolution, etc.

Apart from a compliance perspective, Inspector-cum-Facilitators would also assist in demonstrating various amenities of the online portal, resolve issues/grievances, hold workshops, interactive sessions, help create UAN for employees, act as district nodal officer for accident cases, etc. Further, fortnightly tour programmes must be organised by the Inspectors-cum-Facilitators. These could be a workshop, seminar, or outreach programme.

As Inspectors-cum-Facilitators are treated as flagbearers of EPFO, their code of conduct is also provided in the manual. The code of ethical behaviour is outlined via values such as independence, professionalism, transparency, respect of human rights, non-discrimination, effective communication, continuous learning and collaboration & cooperation.

Impact:

Given the impetus for rationalisation and simplification of labour laws, empowering Inspectors-cum-Facilitators to act as liaison is a welcome measure indicating that the government is keen on not only enforcing compliance aspects but also facilitating compliance through various means.

With the change in legislation over the past few decades and the new kinds of workforce that are emerging of late, inspectors-cum-facilitators have a crucial role to play. A manual such as this would help the establishments, employees / workforce as well as the Inspectors-cum Facilitators to ensure a smooth adherence to PF related requirements.

It is interesting to note that only PF Inspectors are mentioned under the current legislations. However, the manual released by the EPFO mentions Inspector-cum-facilitator which is one of the salient features of the Code on Social Security, 2020. This manual released by the EPFO adds to the list of actions taken to implement labour codes such as notification of section 142 on Aadhaar, enablement of joint option for higher pension contributions etc.

⁶ August 14, 2024



Ministry of Labour & Employment issues press release on active steps for social security to gig/platform workers

The Ministry of Labour & Employment ('MoLE') has issued⁷ a public release stating that the government is committed to extending social security benefits to gig and platform workers.

The MoLE stated that establishments that employ gig and platform workers would be asked to take the lead in registering their gig/platform workers on the e-Shram portal.

The press release also provides an online window that will be made available on the e-Shram portal to ensure a smooth and efficient registration process.

Impact:

There is a need for employers which function on platforms or hire for gig work, to take active steps to register their workers who are engaged in gig/platform work on the e-Shram portal. While no deadline is set for completing the same, it would be easier if the process is initiated at the aggregator's end.

By registering such workers, employers would be more transparent on the number of such workers working in their organisation and indicate their participation in facilitating social security benefits to its gig/platform workers.

Further, to streamline the process, employers may consider sending a survey to the concerned workers, asking if such workers are already registered on the portal. If not registered, they may proactively take steps (such as provision of confirmation to employers after registration on the portal by the worker) to keep track of the number of workers registering themselves on the portal.

To encourage registrations, aggregators may consider conducting awareness sessions for the workers, explaining the advantages of registration on the portal.



Circular clarifying the interest rate on damages before 2024 amendment to the rates

The EPFO has issued a circular⁸ clarifying that any defaults made up to 13 June, 2024 i.e. in the payment of contributions, charges payable, transfer of accumulations under the EPF Act or schemes (The Employees' Provident Funds Scheme, 1952, The Employees' Pension Scheme, 1995 and The Employees' Deposit Linked Insurance Scheme) are to be levied and recovered in accordance with the then prevailing provisions.

The MoLE had issued a notification dated 14 June 2024 on the penal damages payable by employers defaulting in the payment of provident fund, pension, and insurance contributions with the objective to rationalise and simplify the calculation of damages due. This notification had been issued in exercise of the powers conferred to the Central Government under Section 5, 6A and 6C read with subsection (1) of section 7 of the EPF Act. As per the notification, the damages for default in the payment of any contributions to the schemes or transfer of accumulations as specified under the EPF Act, in the payment of any charges payable under any other provisions of the EPF Act or schemes, will be recovered at the rate of 1% of the arrears of contribution per month or part thereof across the three schemes.

Impact:

This circular clarifies the applicable rates for defaults made up to 13 June 2024. This helps avoid confusion about which rate is applicable.

Circular on compliance with guidelines on ESIC Pensioners' Medical Scheme, 2006

Due to several complaints received by the ESIC on the Pensioners' Medical Scheme, 2006 ('PMS 2006'), the ESIC has issued a Circular⁹ on compliance with the guidelines under the ESI PMS 2006. The complaints pertained to the Nodal Officers & ESIC doctors not adhering to the guidelines issued by Headquarters from time to time. The revised guidelines of ESIC-PMS 2006 dated 25.5.2021 were implemented to ensure proper and hassle-free medical facilities for pensioners and their family members.

Detailed procedure has been provided in the revised guidelines regarding cashless super-speciality treatment, medical treatment in emergency, treatment at ESIC hospitals, treatment at private hospitals, treatment on reimbursement basis. Through the Circular, ESIC has requested that medical treatment be provided for pensioners strictly in accordance with ESIC PMS and guidelines issued by Headquarters from time to time.

⁸ August 28, 2024

⁹ August 7, 2024



Kerala Amendment to the Building and Other Construction Workers Rules

The Kerala Government, by way of notification¹⁰ has amended its Rules under the Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act, 1996 ('BOCW Act'). The amendment to Rule 284 (2) states that the BOCW membership would be cancelled if a beneficiary commits default in payment of contributions for more than 3 years. The beneficiaries under the BOCW Act are the workers who are registered with the BOCW Board. The earlier provision states that membership would be cancelled if contributions are not made for a period of 1 year.

Impact:

The amendment to the BOCW Kerala Rules is a step towards urging beneficiaries under the BOCW Act to comply with the existing requirements, while affording some leniency by cancelling membership only if contributions are not made beyond a period of three years. Cancelling membership is a more stringent way of ensuring contributions to the fund are regular and consistent with the aim of securing social security benefits to workers working in this nature of assignments.

Notification of Puducherry Rules under the Transgender Act

The Government of Puducherry has formalized¹¹ the Puducherry Transgender Persons (Protection of Rights) Rules, 2024, ('TP Rules') aimed at supporting transgender individuals. These Rules outline the process for obtaining a Certificate of Identity, which is essential for legal recognition of the gender.

Transgender individuals seeking this certificate must apply in Form I to the District Magistrate, either in person, by post, or online through the provided email ID. The application process includes submitting an affidavit confirming gender identity. For those who have already had their gender legally recognised before, no new application is required; however, they may opt to apply for a new certificate if desired.

The District Magistrate will issue the Certificate of Identity within 30 days of the application. This certificate allows for updates to official documents, including name and gender changes. Additionally, a transgender identity card will be provided.

Further, steps would need to be taken to prevent discrimination and provide equal opportunities to transgender people and publication of an equal opportunity policy by employers, as emphasised in the Rules. The TP Rules also provide for appointment of a Complaints Officer in every establishment.

Impact:

Employers hiring transgender employees would have documentation in place to verify the gender status of such individuals. Basis the employment of such employees, it would be imperative for employers to have an equal opportunity policy in place and also ensure other infrastructural facilities are provided such as unisex toilets, measures put in for safety and security (transportation and guards) and amenities (such as hygiene products) to be provided to the transgender employees so as to enable them to effectively discharge their duties in the establishment.

Employers must also ensure confidentiality of their identities.

¹⁰ August 6, 2024

¹¹ August 8, 2024



II. Case Updates

- **Rajasthan HC upholds claim of maternity benefit for 180 days**

The High Court ('HC') of Rajasthan has recently held¹² that a woman employee should be provided maternity benefits as mandated by law. The petitioner, employed as a conductor, requested 180 days of maternity leave but was granted leave for only 90 days by the employer. The Court's ruling sheds light on the legal standards and entitlements in such scenarios. The HC stated that limiting maternity leave to 90 days at the government-body, while other departments providing 180 days, is discriminatory. It violates the principle of equal opportunity and the fundamental rights of women employees.

The HC also emphasised that maternity leave is vital for supporting women's roles as working mothers, aligning with Article 15(3) for special provisions and Article 42 for humane conditions. The HC held that the government-body must grant 180 days of maternity leave to the petitioner, adjusting for any leave already taken or provide 90 days' salary as compensation if the leave cannot be granted. Further it was recommended to update the existing regulation to give effect to the same.

The HC also directed the Government of India and the Government of Rajasthan to ensure all sectors comply with the 180-day maternity leave provision.

- **Retrospective termination of employment impermissible**

The Punjab and Haryana HC has in a recent ruling held¹³ that employer cannot retroactively deprive the employee benefits accrued during the period of service by backdating the termination. The HC stated that the effective date of termination would have to be a date immediate or in the future. The employee would remain eligible to get the employment benefits till the date of passing of the impugned order by the company. The cessation of the employment contract would partake once the employer-employee relationship ends. This cannot be made effective retrospectively. Employee entitlement during the service period is protected by the regulations in India.

Hence, retrospective dismissal from service deprives the rights and benefits of the employee earned during the employment period and is not justified in law.

- **Delhi Government reiterates contractor's and principal employer's responsibility vis-a-vis statutory bonus**

The Office of the Commissioner (Labour) Labour Department, Government of the National Capital Territory of Delhi ('GNCTD'), on 23 September 2024, issued an advisory¹⁴ on the responsibility of the contractor to pay statutory bonus to its employees and principal employer's responsibility to ensure such obligation is fulfilled.

Principal employers have been asked to ensure disbursement of bonus to outsourced employees by their contractors. The Payment of Bonus Act, 1965 requires that the minimum bonus of 8.33% applicable on basic and dearness allowance is to be paid within 8 months of close of accounting year. This would need to be complied with by the contractor towards their contract workers.

¹²September 17, 2024

¹³September 20, 2024

¹⁴September 23, 2024



- **Lock-in periods in employment agreements do not violate fundamental rights**

In the case of Lily Packers Private Limited v. Vaishnavi Vijay Umak and Others¹⁵, the Delhi High Court ('HC') held that disputes around the lock-in periods as mentioned in the employment contracts were arbitrable and such clauses do not violate the fundamental rights of the employees. The Delhi HC noted that the reasonable lock-in periods in employment contracts that apply during the term of employment are valid in law and do not violate the fundamental rights of employees as enshrined in the Constitution of India, 1950.

Therefore, if such employment agreements have a clause on arbitration, any disputes pertaining to the lock-in period provided, should be resolved through arbitration as stipulated.

- **Contractual employee not appointed against regular post cannot seek permanent employment based on mere contract extension**

The Madhya Pradesh HC recently¹⁶ said that a contractual employee cannot claim regularisation merely because he has continued working beyond the period of employment. Working beyond the contractual term would not entitle him to become a permanent employee. The division bench in its order stated ".... contractual employee cannot claim regularisation or permanent status and his services are co-terminus with the period of contract".

¹⁵Arbitration Petition Number 1210, 1212 and 1213 of 2023

¹⁶ Writ Appeal No. 607 of 2023

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