

Name of form as per I.T. Rules, 1962	3CEEA	Name of form as per I.T. Rules, 2026	53
Corresponding section of I.T. Act, 1961	92CE	Corresponding section of I.T. Act, 2025	170
Corresponding Rule of I.T. Rules, 1962	10RB	Corresponding Rule of I.T. Rules, 2026	118

Form 53- Form for filing particulars of past years for calculating relief in tax payable under section 206(1) of the Income-tax Act, 2025.

Purpose:

Taxpayers were facing hardships due to incremental minimum alternate tax (MAT) arising from incremental income required to be recorded pursuant to Advance Pricing Agreement (APA), or due to a secondary adjustment. In this regard, relief was granted vide the Finance Act, 2021, wherein, the taxpayer, impacted due to secondary adjustments/APA related adjustments for past year(s), can make an application under a prescribed form to recompute the book profits and, consequently, MAT liability. The Central Board of Direct Taxes (CBDT) notified **Rule 10RB** in the Income-tax Rules, 1962, governing the computation mechanism for aforementioned relief. The notification prescribes Form No. 3 CEEA (**now Form 53**), which is required to be filed by the taxpayer to claim such relief. Form 53 is filed under **Rule 118** of the Income-tax Rules, 2026. This Form must be verified by the person who is authorised to verify the taxpayer's return of income.

Who Should File:

Any taxpayer who is subject to the minimum alternate tax (MAT) payable in a year in which transfer pricing (TP) adjustments are made for past years (i.e., additional income is included in the books of account) following the conclusion of an Advance Pricing Agreement (APA) or a secondary adjustment.

Further, to seek the MAT relief under sub-section 206(1) of the Income-tax Act, 2025 (the Act) it is provided that –

- To claim MAT relief, the taxpayer should not have utilised the MAT credit (under section 206 of the Act) previously allowed.
- No interest will be payable to the taxpayer on the refund arising because of the provisions of the regulation.

Frequency & Due Dates:

Required to be filed by Applicant, in a Financial Year (FY) when there is an increase in book profit of the FY due to the income of past year(s) included in the book profit on account of an Advance

Pricing Agreement (APA) entered by the taxpayer or secondary adjustment required under the Act.

Structure of Form 53:

- Part A: Particulars of the Person
- Part B: Other Details:
 - Residential Status
 - Relevant Tax Year
 - Details of past income, and calculations of Amounts A, B, C and D as per **Rule 118**

What are the documents required to file the Form 53?

No specific documents required

What is the process flow of filing Form 53?

The process flow includes following steps:

1. The Applicant shall file Form 53 electronically
2. The Form No. 53 requires the taxpayer to provide the details of past income and the MAT payable on such income, in the prescribed manner and format.
3. This Form must be verified by the person who is authorised to verify the taxpayer's return of income.
4. The MAT relief available under **Rule 118** of the Rules (by reduction of the MAT payable by the taxpayer for the FY), will be determined based on the following formula: $[(A-B) - (D-C)]$, where the amounts A, B, C and D are defined in the same Rule.
5. Past income is defined as the amount of income of past year(s) included in the book profit of the FY on account of an APA entered into by the taxpayer or secondary adjustment required under the Act.
6. If there is no MAT relief available under **Rule 118** of the Rules [i.e., the value of $(A-B) - (D-C)$ is negative], the value of the formula will be considered as zero.
7. The MAT credit previously allowed to the taxpayer shall be reduced by the MAT relief available under **Rule 118** of the Rules.

Outcome of Processed Form 53:

- On receipt of the Form 53, the person who is authorised to verify the taxpayer's return of income, shall verify the amount claimed as relief in tax payable under section 206(1) of the Income-tax Act, 2025 and provide the same to the taxpayer.

Brief note on broad or qualitative changes proposed:

- No major changes have been incorporated into the Form. Qualitative changes have been made to bring the Form in line with the modified **Rule 118** which has been changed for simplification and ease of computation.

Challenges and Solutions:

- No particular challenges faced. Qualitative changes have been made to bring the Form in line with the modified **Rule 118** which has been changed for simplification and ease of computation.

Common Changes made across Forms:

1. To make Forms system-friendly and enable e-filing and uploading, certain anomalies found due to grouping of Name, Designation, Address, PAN and Aadhaar number have been separated into different boxes.
2. Assessment / Financial / Previous year or years have been replaced with Tax year or years, wherever appearing in the Form/Annexure.
3. Sections, Clauses and Schedules changes as per the Income-tax Act, 2025.
4. Currency symbol "Rs." has been replaced with "₹".