

Director General of Anti-Profiteering v. Ireo Grace Realtech Pvt. Ltd.

Case number: NAPA/159/PB/2025

Citation: No neutral or reporter citation printed in the identified official order.

Decision date: 11 February 2026

The Corridors: no additional ITC benefit found; the source contains an unresolved settlement-email date

Court: Goods and Services Tax Appellate Tribunal, Principal Bench, New Delhi, Anti-Profiteering Division

Bench: Shri A. Venu Prasad, Member (Technical), Single Bench Court No. 4

Decision stage: Final reasoned no-contravention disposal for The Corridors, with an unresolved internal date in the settlement recital.

01 Facts of case and issues

Three homebuyers complained that Ireo Grace Realtech had not passed on additional ITC through reduced construction prices after GST commenced in relation to The Corridors, Sector 67A, Gurgaon. An initial DGAP report dated 21 February 2019 found contravention. The matter went through further investigation under Rule 133(4), a report dated 12 February 2020 and later CCI reconsideration. Following the Delhi High Court's judgment dated 29 January 2024, CCI directed reinvestigation on 7 May 2024.

The report before GSTAT was dated 28 October 2024. The issue was whether its revised no-additional-benefit conclusion should be accepted. The short final order does not identify a complete investigation start/end period or reproduce a quantified earlier demand; those details are not supplied by inference.

Pinpoint: Paragraphs 1–5, physical pp. 2–4.

02 Discussion by Hon'ble Tribunal

DGAP reported an ITC-to-purchase-value ratio of 4.66% before GST and 4.54% after GST, a decline of 0.12 percentage points. It concluded that no additional ITC benefit accrued. The Tribunal recorded notice, additional opportunities and the absence of the applicants and respondent at the 10 February 2026 hearing, then accepted the report and expressly held that Section 171 had not been contravened.

Paragraph 6 also reports that one applicant informed the Tribunal of an amicable settlement by an email dated 17 October 2026. That date is later than both the order's 11 February 2026 date and the 13 October 2026 review date. It is an unresolved internal inconsistency in the official source. The note does not change it to another year or treat it as reliable proof of when a settlement occurred.

The operative no-contravention finding is clear, but the recorded settlement chronology requires confirmation from the underlying record before reliance. This is neither a general rule that private settlements end statutory proceedings nor a ruling clearing other IREO entities or projects. The earlier report's adverse finding is history and must not be presented as the GSTAT outcome.

Pinpoint: Ratios: paragraph 5, physical pp. 3–4. Notice, hearing and inconsistent email date: paragraph 6, physical p. 4. Holding: paragraphs 7–8, physical p. 4.

03 Judicial decision and operative relief

The Tribunal accepted the DGAP report dated 28 October 2024 and held that there was no contravention of Section 171. It disposed of the proceedings and directed supply of the order to the applicants, respondent and concerned Commissionerate. No payment, interest or penalty was ordered. The form, closing date and digital-signature date identify 11 February 2026.

Pinpoint: Paragraphs 7–10 and date/signature block, physical p. 4; form, physical pp. 1–2.

04 In favour of

Ireo Grace Realtech Pvt. Ltd., for The Corridors on the reinvestigated record. The no-contravention finding is limited to this matter, and the settlement-email chronology remains unverified.

Final reasoned no-contravention disposal based on acceptance of the revised DGAP report, with a disclosed source-date inconsistency. It is not a general industry exemption or clearance of other IREO companies.

Pinpoint: Paragraphs 5–8, physical pp. 3–4.

05 AKHB REVIEW POINT

AKHB analysis: Keep earlier adverse reports, remand directions and the final reinvestigation result in chronological order. A published historical allegation or DGAP finding should not be substituted for the Tribunal's final operative conclusion. Retain the project's credit/purchase reconciliation and do not convert a ratio decline into a universal exemption.

Seek the underlying email, settlement documents and any certified correction before making a claim about settlement timing or its legal effect. Preserve the printed 17 October 2026 recital as a source discrepancy rather than silently amending it. The final decision date remains 11 February 2026 on the identified order.

Keep Ireo Grace Realtech and The Corridors separate from Ireo Victory Valley and other IREO-branded firms/projects. A similar brand name is not evidence of identical legal parties, credit pools or proceedings.

Pinpoint: AKHB commentary based on paragraphs 1–8, physical pp. 2–4, and caption on physical p. 1. Recommendations are distinct from the holding.

Sources and limitations

Relevant provisions

CGST Act 2017: Section 171; CGST Rules 2017: Rule 129, Rule 129(6) and Rule 133(4); CGST Act 2017: Sections 109 and 171(2), institutional/current-law context; Central Tax Notifications 18/2024 and 19/2024, empowerment and new-request-cutoff context.

Statutory note

Checked 13 October 2026. Section 171(1) requires the benefit of a tax-rate reduction or ITC to be passed to recipients through commensurate price reduction. Notification 18/2024-Central Tax, issued under Section 171(2) read with Section 109(1) and the second proviso to Section 109(5), empowers the Principal Bench constituted under Section 109(3) from 1 October 2024. Notification 19/2024-Central Tax fixes 1 April 2025 as the date from which the authority shall not accept new examination requests. Its text does not repeal Section 171 or direct automatic termination of pending matters. This anti-profiteering jurisdiction must be distinguished from ordinary GST appellate jurisdiction; earlier NAA/CCI investigations are historical steps.

Treatment note

Checked 13 October 2026. Targeted official-domain searches did not locate a later case-specific stay, reversal or appellate decision concerning this identified GSTAT order. This is a bounded search result, not certification that no appeal or stay exists. The complete current appellate docket and compliance position were not verified. The Delhi High Court's 29 January 2024 judgment in Reckitt Benckiser, W.P.(C) 7743/2019, forms the reported background to reinvestigation. Supreme Court records list Reckitt's SLP(C) 12705/2024, including on 13 May 2026; the listing establishes further proceedings, not a stay, affirmation or final Supreme Court outcome.

Scope of source review

One final order of the GSTAT Principal Bench exercising anti-profiteering jurisdiction. DGAP reports and earlier NAA/CCI or High Court steps are history as recorded in this order unless a separate source is expressly identified. The administrative form is read with the signed reasons. Ordinary GST appeals, all State Benches and corpus-wide completeness are not covered.

Identity note

NAPA/159/PB/2025; order reference ZA070010226000049H; printed and signature date 11 February 2026. Paragraph 6 nevertheless prints an email date of 17 October 2026. The discrepancy is retained and unresolved, not silently corrected.

Primary source

Source description: Complete 4-page official PDF, including Form GST APL-04A and the final reasoned order. Every original page read and individually viewed; source bytes preserved. A fresh official download on 13 October 2026 was byte-identical to the retained original.

Official source: [Open source document](#)

Source pages: 4

Outcome type: final

Additional source

Central Tax Notification 18/2024 dated 30 September 2024

Source document: [Open source document](#)

Pinpoint: Paragraphs 1–2, physical p. 1: statutory power and commencement on 1 October 2024.

Central Tax Notification 19/2024 dated 30 September 2024

Source document: [Open source document](#)

Pinpoint: Operative paragraph, physical p. 1: 1 April 2025 cutoff for accepting examination requests.

CGST Act 2017, India Code compilation marked as at 11 June 2026

Source document: [Open source document](#)

Pinpoint: Sections 109 and 171; relevant statutory passages reviewed, not a complete legislative-update audit.

Reckitt Benckiser India Private Limited v. Union of India, Delhi High Court, 29 January 2024

Source document: [Open source document](#)

Pinpoint: W.P.(C) 7743/2019 and connected matters; background authority. This note does not claim final Supreme Court approval.

Supreme Court cause list for 13 May 2026

Source document: [Open source document](#)

Pinpoint: Physical p. 37, Reckitt SLP(C) 12705/2024. Listing evidence only, not a merits judgment or stay order.

Disclosures and source rights

AI disclosure: Prepared with AI assistance from the identified sources. No human legal review is claimed.

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Source checked: 13 October 2026