

F.No.370142/46/2025-TPL
Government of India
Ministry of Finance
Department of Revenue
Central Board of Direct Taxes
(TPL Division)

New Delhi, 30th March, 2026

Sub: Notification of Sovereign Wealth Fund under Schedule V [Table: Sl. No. 7.Note 5(a)(ii)(G)] of the Income-tax Act, 2025-reg.

Schedule V [Table: Sl. No. 7] of the Income-tax Act, 2025 (hereinafter referred to as the Act) *inter alia* provides for exemption to income of a specified person in the nature of dividend, interest, any sum referred to in section 92(2)(k) of the Act or long-term capital gains (whether or not such capital gains are deemed as short-term capital gains under section 76 of the Act) arising from investment made by it in India if the investment is made in specified infrastructure business (including business notified vide Notification F.No. 13/1/2025-IPP dated 19.09.2025, i.e. Infrastructure sub-sectors mentioned in Harmonised Master List) during the period from 01.04.2020 to 31.03.2030, and held for at least three years.

2. Specified person for this purpose *inter alia* includes notified sovereign wealth fund (SWF) which fulfils the conditions specified in Schedule [Table: Sl. No. 7. Note 5(a)].

3. In order to facilitate the process of notification of the SWF, the Board, in exercise of powers conferred under section 239 of the Act, hereby specifies that the SWF shall file application in the Form I in the Annexure to this circular. The Form I shall be filed with the Member, Central Board of Direct Taxes, Department of Revenue, Ministry of Finance, New Delhi having supervision and control over the work of Foreign Tax and Tax Research Division.

4. Further, the notified SWF shall be required to file return of income along with the audit report. It shall also be required to file a quarterly statement within one month from the end of the quarter electronically in Form II in respect of each investment made during the quarter in the Annexure to this circular.

5. The requirement of filing Form I and Form II by the SWF shall apply as follows:

5.1 Category I: SWF already notified under section 10(23FE) of the Income-tax Act, 1961

5.1.1 SWF which have already been notified under section 10(23FE) of the Income-tax Act, 1961 are not required to file fresh application in Form I as provided in para 3. However, such notified funds shall be required to file a quarterly statement within one month from the end of the quarter electronically in Form II as provided in para 4 in respect of each investment made during the quarter.

5.2 Category II: SWF seeking fresh notification under Schedule V [Table: Sl. No. 7.Note 5(a)(ii)(G)] of the Act

5.2.1 SWF seeking fresh notification under Schedule V [Table: Sl. No. 7.Note 5(a)(ii)(G)] of the Act shall file application in the Form I as provided in para 3 and such notified funds shall be required to file a quarterly statement within one month from the end of the quarter electronically in Form II as provided in para 4 in respect of each investment made during the quarter.

6. The Director General of Income-tax (Systems) shall lay down the data structure, standards and procedure for furnishing and verification of the Form I and Form II and shall be responsible for formulating and implementing appropriate security, archival and retrieval policies in relation to the said forms so furnished.

7. This circular will be effective from 01.04.2026 and will apply for tax year 2026-27 and subsequent tax years.

Enclosure: Annexure



(Rohit Singh)

Under Secretary (TPL-1)
CBDT, New Delhi

Copy to the:

1. PS/OSD to FM/ PS/OSD to MoS(F).
2. PS to the Finance Secretary.
3. PS to the Revenue Secretary.
4. Chairman and Members, CBDT.
5. Joint Secretaries/ CsIT/Directors/Deputy Secretaries/Under Secretaries, CBDT.
6. C&AG of India (30 copies).
7. JS & Legal Advisor, Ministry of Law & Justice, New Delhi.
8. Institute of Chartered Accountants of India.
9. CIT (M&TP), Official Spokesperson of CBDT.
10. Principal DGIT (Systems) for uploading on the departmental website.



(Rohit Singh)

Under Secretary (TPL-1)
CBDT, New Delhi

FORM I

Application for notification under Schedule V [Table: Sl. No.7.Note 5(a)(ii)(G)]
(Sovereign Wealth Fund)

Part A: Particulars of the Sovereign Wealth Fund (SWF)		
1.	Name:	(refer Note 1)
2.	Address:	(refer Note 2)
3.	Communication Address in India:	(refer Note 3)
4.	Permanent Account Number (PAN):	
5.	Tax Identification Number (TIN):	(refer Note 4)
6.	Country of residence:	
7.	Set up under the law of (please mention the name of the foreign country)	
8.	E-mail Id:	
9.	Contact Number:	Country Code Number
10.	Other details to be provided as separate enclosure:	(attach as per Note 5)

Part B: Certification

The applicant is a SWF and interested in making investment in terms of Schedule V [Table: Sl. No. 7] and therefore, it is requested that necessary notification may kindly be issued. It is hereby certified that the SWF satisfies all the conditions mentioned in Schedule V [Table: Sl. No. 7 and Sl. No.7.Note 5(a)(ii)].

Verification

I, _____, hereby affirm that the information provided in this application is true and correct to the best of my knowledge. I have not concealed any relevant fact.

I am submitting this application in my capacity as _____ (designation), holding PAN _____ and I am competent to verify and submit this application.

Place:

Date:

Signature:

Name:

Designation:

Notes:

1. The name shall include full name of the Sovereign Wealth Fund.
2. The address shall include flat/door/building, road/street/block/sector, area/locality, post office, town/city/district, state, country/region and pin code/zip code.
3. The communication address in India shall include flat/door/building, road/street/block/sector, area/locality, post office, town/city/district, state and pin code.
4. TIN of the Sovereign Wealth Fund in the country or specified territory of its residence and in case no such number is available, then a unique number on the basis of which it is identified by the Government of that country or the specified territory of which it claims to be a resident.

5. With respect to Part A (Sl. No. 10), following details shall be provided as annexures, namely: —

Annexure	Particulars
A-1	Documents constituting the SWF and amendments (if any)
A-2	Any other relevant information

6. The application in this form is to be made to the Member (having supervision and control over the work of Foreign Tax and Tax Research Division), Central Board of Direct Taxes, Department of Revenue, Ministry of Finance, New Delhi.
7. The form is to be signed by the person competent to verify the return of income under section 265.
8. Some of the information in the form would be pre-filled to the extent possible.

FORM II

**Intimation by Sovereign Wealth Fund of investment under Schedule V [Table: Sl. No. 7]
(within one month from the end of the quarter ending on 30th June, 30th September, 31st
December and 31st March of the financial year)**

Part A: Particulars of the Sovereign Wealth Fund (SWF)							
1.	Name:		(refer Note 1)				
2.	Address:		(refer Note 2)				
3.	Permanent Account Number (PAN):						
4.	E-mail Id:						
5.	Contact Number:		Country	Number			
			Code				
Part B: Other Details							
6.	Notification Number:						
7.	Notification Date:						
8.	Financial Year:						
9.	Quarter Ending:		(refer Note 3)				
Part C: Particulars of Investment							
Sl. No.	Date of investment	Amount	Nature of investment (refer Note 4)	Nature of income (refer Note 5)	Details of the entity in which Investment made		
					Nature of entity (refer Note 6)	Name	PAN
A	B	C	D	E	F	G	H
1.							
2.	<i>(Repeat, if required)</i>						
Total							

Verification	
<p>I, _____, solemnly affirm that to the best of my knowledge and belief, the information provided in this form is correct and complete and particulars shown therein are truly stated. I further declare that I have not concealed any relevant fact or information.</p> <p>I also declare that I am making this intimation in my capacity as _____ (designation) and that I am holding PAN _____ and I am competent to verify and submit this intimation.</p>	

Place:

Date:

Signature:

Name:

Designation:

Notes:

- The name shall include full name of the Sovereign Wealth Fund.
- The address shall include flat/door/building, road/street/block/sector, area/locality, post office, town/city/district, state, country/specified territory and pin code.
- In Part B (Sl. No. 9), fill with 30th June/ 30th September/ 31st December/ 31st March.
- In Part C (column D), one of the following codes is to be selected:

Nature of Investment	Code
Debt	1
Equity	2
Preference Shares	3
Others (Please specify)	4

5. In Part C (column E), one of the following codes is to be selected:

Nature of Income	Code
Interest	1
Dividends	2
Capital Gains	3
Others (Please specify)	4

6. In Part C (column F), one of the following codes is to be selected:

Nature of entity in which investment is made	Code
Business Trust referred to in Schedule V [Table: Sl. No. 7.D(a)(iii)(A)]	1
Eligible Infrastructure Facility referred to in Schedule V [Table: Sl. No. 7.D(a)(iii)(B)]	2
Eligible Alternative Investment Fund referred to in Schedule V [Table: Sl. No. 7.D(a)(iii)(C)]	3
Eligible Domestic Company referred to in Schedule V [Table: Sl. No. 7.D(a)(iii)(D)]	4
Eligible Non-Banking Financial Company referred to in Schedule V [Table: Sl. No. 7.D(a)(iii)(E)]	5

7. This form is to be applied to the Assessing Officer and is to be signed by the person competent to verify the return of income under section 265.
8. Some of the information in the form would be pre-filled to the extent possible.
9. The amount mentioned in this form is to be filled in rupees unless stated otherwise.