KERALA AUTHORITY FOR ADVANCE RULING
GOODS AND SERVICES TAX DEPARTMENT
TAX TOWER, THIRUVANANTHAPURAM

BEFORE THE AUTHORITY OF: Shri. Jomy Jacob, IRS &
: Shri. Mansur M.I.

Legal Name of the applicant	M/s. Malabar Gold Private Limited
GSTIN	32AADCM9043R1Z0
ARN	AD321023002951T
Address	3rd Floor, 16/501M, Malabar Head Quarters, Montana Estates, Paingottupuram, Peringolam, Kunnamangalam, Kozhikode, Kerala – 673571.
Advance Ruling sought for	a) Whether the exchange of old gold by an unregistered person with new gold attract GST at the hands of the registered seller? b) If the answer is 'yes' what is the value of taxable supply on which GST is applicable under Section 15 of the GST Act, 2017 read with Rule 32(5) of CGST Rules, 2017? c) Where the taxable supply is provided by a person dealing in buying and selling of old gold as such or after processing, is not the value of supply, the difference between the selling price and the purchase price? d) Where the registered dealer is providing taxable supply of new gold in exchange of old gold, is he not liable to pay tax on the price

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	difference between old gold and new gold? e) When a taxable supply is provided by a registered person to the person from whom old gold is exchanged, what is the sale value on which GST is payable?
Date of Personal Hearing	02.04.2025
Authorized Representative	Shri.K.P.Abdul Azeez, Advocate

ADVANCE RULING No.KER/38/2025 Dated 24/11/2025

1. M/s. Malabar Gold Pvt. Ltd. (hereinafter referred to as 'the applicant') is a private limited company engaged in the business of trading in gold and diamonds, including both inward and outward supplies of these goods.

2. The applicant requested advance ruling on the following:

a) Whether the exchange of old gold by an unregistered person with new gold attract GST at the hands of the registered seller?

b) If the answer is 'yes' what is the value of taxable supply on which GST is applicable under Section 15 of the GST Act, 2017 read with Rule 32(5) of CGST Rules, 2017?

c) Where the taxable supply is provided by a person dealing in buying and selling of old gold as such or after processing, is not the value of supply, the difference between the selling price and the purchase price?

d) Where the registered dealer is providing taxable supply of new gold in exchange of old gold, is he not liable to pay tax on the price difference between old gold and new gold?



e) When a taxable supply is provided by a registered person to the person from whom old gold is exchanged, what is the sale value on which GST is payable?

3. The Applicant by email dated 15/10/2025 requested to permit them to withdraw the application submitted as per ARN AD321023002951T dated 17.10.2023 for Advance Ruling.

4. In view of the above, the following rulings are issued;

RULING

The application is dismissed as withdrawn.

Jomy Jacob, IRS
Additional Commissioner of Central Tax
Member

Mansur M.I.
Joint Commissioner of State Tax
Member

To

M/s. Malabar Gold Private Limited
3rd Floor, 16/5A1M, Malabar Head Quarters,
Montana Estates, Paingottupuram, Peringolam,
Kunnamangalam, Kozhikode, Kerala – 673571.

Copy submitted to:

1. The Chief Commissioner of Central Tax and Central Excise, Thiruvananthapuram Zone, C.R.Building, I.S.Press Road, Cochin- 682018. [E-mail ID: cccochin@nic.in; ccu-cexcok@nic.in]
2. The Commissioner of State Goods and Services Tax Department, Tax Towers, Karamana, Thiruvananthapuram – 695002.

3. The Commissioner of Central GST and Central Excise, Calicut Commissionerate

Copy to :

1. The Additional Commissioner, TPS, HQ, Thiruvananthapuram.
2. The Deputy Commissioner, ITMD, Thiruvananthapuram.
3. The Assistant Commissioner/State Tax Officer, Tax payer services Circle, Kozhikode.
4. The Superintendent, Central Tax, Kozhikode III Range, Kozhikode Urban Division.

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