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General information about company		
Scrip code	532843	Enter the quarter ended date only
NSE Symbol	FORTIS	
MSEI Symbol	NOTLISTED	
ISIN	INE061F01013	
Name of the entity	FORTIS HEALTHCARE LIMITED	
Date of start of financial year	01-04-2025	
Date of end of financial year	31-03-2026	
Reporting Quarter Type	Quarterly	
Date of Quarter Ending	30-06-2025	
Type of company	Equity	
Whether Annexure I (Part A) of the SEBI Circular dated December 31, 2024 related to Compliance Report on Corporate Governance is applicable to the entity?	Yes	
Whether Annexure I (Part B) of the SEBI Circular dated December 31, 2024 related to Investor Grievance Redressal Report is Applicable to the entity?	Yes	
Whether Annexure I (Part C) of the SEBI Circular dated December 31, 2024 related to Disclosure of Acquisition of Shares or Voting Rights in Unlisted Companies is Applicable to the entity?	No	Add Notes
Whether Annexure I (Part D) of the SEBI Circular dated December 31, 2024 related to Disclosure of Imposition of Fine or Penalty is Applicable to the entity?	Yes	
Whether Annexure I (Part E) of the SEBI Circular dated December 31, 2024 related to Disclosure of Updates to Ongoing Tax Litigations or Disputes is Applicable to the entity?	Yes	
Risk management committee	Applicable	
Market Capitalisation as per immediate previous Financial Year	Top 500 listed entities	
Is SCORE ID Available ?	Yes	
SCORE Registration ID	f00057	
Reason For No SCORE ID		
Type of Submission	Original	
Remarks (website dissemination)	Add Notes	
Remarks for Exchange (not for Website Dissemination)	Add Notes	

<<< Notes mandatory, if Not Applicable

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Annexure I

Annexure I to be submitted by listed entity on quarterly basis

I. Composition of Board of Directors

Disclosure of notes on composition of board of directors explanatory

Add Notes

Whether the listed entity has a Regular Chairperson

Yes

Whether Chairperson is related to MD or CEO

No

Sr	Title (Mr / Ms)	Name of the Director	PAN	DIN	Category 1 of directors	Category 2 of directors	Category 3 of directors	Date of Birth	Whether the director is disqualified?	Start Date of disqualification	End Date of disqualification	Details of disqualification	Current status	Whether special resolution passed? [Refer Reg.17(1A) of Listing Regulations]	Date of passing special resolution	Initial Date of appointment	Date of Re-appointment	Date of cessation	Tenure of director (in months)	No of Directorship in listed entities including this listed entity (Refer Regulation 17A of Listing Regulations)	No of Independent Directorship in listed entities including this listed entity [with reference to provision regulation 17A(1) & reg. 17A(2)]	Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations)	No of post of Chairperson in Audit/ Stakeholder Committee held in listed entities including this listed entity (Refer Regulation 26(1) of Listing Regulations)	Reason for Cessation	Notes for not providing PAN	Notes for not providing DIN
1	Mr	Leo Puri	AALP0852A	01764813	Non-Executive - Independent Director	Chairperson		03-01-1961	No				Active	NA		27-12-2024			7.00	3	3	2	1			
2	Mr	Indrajit Banerjee	ADVP88026B	01365405	Non-Executive - Independent Director	Not Applicable		14-01-1956	No				Active	NA		27-04-2018	27-04-2023		86.00	2	2	4	3			
3	Mr	Ashutosh Raghuvanshi	ACBPA0998E	02775637	Executive Director	Not Applicable	CEO-MD	11-08-1962	No				Active	NA		19-03-2019	19-03-2025			1	0	1	0			
4	Ms	Suvasmita Chakraborty	AADPC2775K	00106054	Non-Executive - Independent Director	Not Applicable		22-07-1966	No				Active	NA		27-04-2018	27-04-2023		86.00	2	2	3	1			
5	Mr	Dilip Kadambi	AEGPK9884A	02148022	Non-Executive - Non Independent Director	Not Applicable		02-08-1974	No				Active	NA		04-06-2020				1	0	0	0			
6	Ms	Shalija Chandra	AACP1826A	03320688	Non-Executive - Independent Director	Not Applicable		17-06-1944	No				Active	Yes	28-06-2020	28-06-2020	28-06-2020	27-06-2025	60.00	0	0	0	0	Tenure Completion	18	
7	Mr	Mehmet Ali Aydinlar	ZZZZ29999Z	10073483	Non-Executive - Non Independent Director	Not Applicable		24-07-1956	No				Active	NA		28-03-2023		27-06-2025		0	0	0	0	Others	9	
8	Mr	Tomo Nagahiro	ZZZZ29999Z	10074111	Non-Executive - Non Independent Director	Not Applicable		17-12-1975	No				Active	NA		28-03-2023				1	0	0	0		4	
9	Mr	Lim Tsin Lin	ZZZZ29999Z	10118906	Non-Executive - Non Independent Director	Not Applicable		23-07-1978	No				Active	NA		04-05-2023				1	0	0	0		5	
10	Mr	Ashok Pandit	AAIP92294C	09279899	Non-Executive - Non Independent Director	Not Applicable		24-12-1965	No				Active	NA		13-09-2023				1	0	3	0		6	
11	Mr	Prem Kumar Nair	ZZZZ29999Z	10348774	Non-Executive - Non Independent Director	Not Applicable		25-08-1960	No				Active	NA		10-11-2023				1	0	0	0		7	

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II. Composition of Committees

For this quarter kindly note the following points:
1. Date of Appointment and Date of Cessation (if applicable) must be mandatorily filled for every Committee.
2. Date of Appointment can be any day upto September 30, 2022.
3. Date of Cessation must be for the current quarter only, i.e. July 1,2022 to September 30,2022

Disclosure of notes on composition of committees explanatory

Add Notes

Note: Please enter DIN. After entering DIN, Name of Committee members and Category 1 of Directors shall be prefilled automatically

Audit Committee Details							
Whether the Audit Committee has a Regular Chairperson					Yes		
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation	Remarks
1	01365405	Indrajit Banerjee	Non-Executive - Independent Director	Chairperson	13-11-2018		
2	03320688	Shailaja Chandra	Non-Executive - Independent Director	Member	14-08-2020	27-06-2025	35
3	09279899	Ashok Pandit	Non-Executive - Non Independent Director	Member	30-10-2023		
4	00106054	Suvalaxmi Chakraborty	Non-Executive - Independent Director	Member	13-11-2018		
5							
6							
7							
8							
9							
10							

Note: Please enter DIN. After entering DIN, Name of Committee members and Category 1 of Directors shall be prefilled automatically

Nomination and remuneration committee							
Whether the Nomination and remuneration committee has a Regular Chairperson					Yes		
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation	Remarks
1	00106054	Suvalaxmi Chakraborty	Non-Executive - Independent Director	Chairperson	27-06-2025		21
2	01365405	Indrajit Banerjee	Non-Executive - Independent Director	Member	13-11-2018		
3	03320688	Shailaja Chandra	Non-Executive - Independent Director	Chairperson	22-07-2021	27-06-2025	34
4	10348774	Prem Kumar Nair	Non-Executive - Non Independent Director	Member	10-11-2023		
5							
6							
7							
8							
9							
10							

Note: Please enter DIN. After entering DIN, Name of Committee members and Category 1 of Directors shall be prefilled automatically

Stakeholders Relationship Committee							
Whether the Stakeholders Relationship Committee has a Regular Chairperson					Yes		
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation	Remarks
1	01365405	Indrajit Banerjee	Non-Executive - Independent Director	Chairperson	13-11-2018		27
2	02775637	Ashutosh Raghuvanshi	Executive Director	Member	27-07-2021		
3	09279899	Ashok Pandit	Non-Executive - Non Independent Director	Member	27-06-2025		28
4	03320688	Shailaja Chandra	Non-Executive - Independent Director	Chairperson	14-08-2020	27-06-2025	33
5							
6							
7							
8							
9							
10							

Risk Management Committee							
Whether the Risk Management Committee has a Regular Chairperson					Yes		
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation	Remarks
1	01764813	Leo Puri	Non-Executive - Independent Director	Chairperson	27-06-2025		26
2	02775637	Ashutosh Raghuvanshi	Executive Director	Member	15-10-2020		
3	02148022	Dilip Kadambi	Non-Executive - Non Independent Director	Member	29-09-2023		
4	03551067	Bishnu Prasad Panigrahi	Head Group Medical Strategy and Operations	Member	15-10-2020		17
5	02407380	Anil Vinayak	Group Chief Operating Officer	Member	15-10-2020		16
6	03320688	Shailaja Chandra	Non-Executive - Independent Director	Chairperson	15-10-2020	27-06-2025	32
7							
8							
9							
10							

Note: Please enter DIN. After entering DIN, Name of Committee members and Category 1 of Directors shall be prefilled automatically

Corporate Social Responsibility Committee							
Whether the Corporate Social Responsibility Committee has a Regular Chairperson					No		
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation	Remarks
1	02775637	Ashutosh Raghuvanshi	Executive Director	Member	27-07-2021		
2	03320688	Shailaja Chandra	Non-Executive - Independent Director	Member	01-10-2024	27-06-2025	31
3	01365405	Indrajit Banerjee	Non-Executive - Independent Director	Member	13-11-2018		
4	09279899	Ashok Pandit	Non-Executive - Non Independent Director	Member	27-06-2025		29
5							
6							
7							
8							
9							
10							

Other Committee						
Sr	DIN Number	Name of Committee members	Name of other committee	Category 1 of directors	Category 2 of directors	Remarks
1						
2						
3						
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III. Meeting of Board of Directors

Disclosure of notes on meeting of board of directors explanatory

[Add Notes](#)

Sr. No.	Date(s) of meeting (Enter dates of Previous quarter and Current quarter in chronological order)	Maximum gap between any two consecutive (in number of days)	Notes for not providing Date	Whether requirement of Quorum met (Yes/No)	Total Number of Directors as on date of the meeting	Number of Directors present* (All directors including Independent Director)	No. of Independent Directors attending the meeting*
Add Delete							
1	07-02-2025			Yes	11	9	4
2	20-03-2025	40		Yes	11	10	4
3	20-05-2025	60		Yes	11	9	4
4	19-06-2025	29		Yes	11	10	4

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* to be filled in only for the current quarter meetings

Annexure 1										
IV. Meeting of Committees										
Disclosure of notes on meeting of committees explanatory							Add Notes			
Sr	Name of Committee	Date(s) of meeting (Enter dates of Previous quarter and Current quarter in chronological order)	Maximum gap between any two consecutive (in number of days)	Name of other committee	Reason for not providing date	Whether requirement of Quorum met (Yes/No)	Total Number of Directors in the Committee as on date of the meeting	Number of Directors Present (All Directors including Independent Director)	No. of Independent Directors attending the meeting*	No. of members attending the meeting (other than Board of Directors)
<div>AddDelete</div>										
1	Audit Committee	06-02-2025				Yes	4	4	3	0
2	Audit Committee	12-03-2025	33			Yes	4	4	3	0
3	Audit Committee	06-05-2025	54			Yes	4	4	3	0
4	Audit Committee	19-05-2025	12			Yes	4	4	3	0
5	Nomination and remuneration committee	07-02-2025				Yes	3	3	2	0
6	Nomination and remuneration committee	29-04-2025	80			Yes	3	3	2	0
7	Nomination and remuneration committee	19-05-2025	19			Yes	3	3	2	0
8	Stakeholders Relationship Committee	06-02-2025				Yes	3	3	2	0
9	Stakeholders Relationship Committee	19-05-2025	101			Yes	3	3	2	0
10	Risk Management Committee	12-03-2025				Yes	3	2	1	2
11	Risk Management Committee	04-04-2025	22			Yes	3	3	1	2
12	Corporate Social Responsibility Committee	29-04-2025	24			Yes	3	3	2	0

* to be filled in only for the current quarter meetings

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V. Affirmations

Sr	Subject	Compliance status (Yes/No)
1	The composition of Board of Directors is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015	Yes
2	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015 a. Audit Committee	Yes
3	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. b. Nomination & remuneration committee	Yes
4	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. c. Stakeholders relationship committee	Yes
5	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. d. Risk management committee (applicable to the top 1000 listed entities)	Yes
6	The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	Yes
7	The meetings of the board of directors and the above committees have been conducted in the manner as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	Yes
8	This report and/or the report submitted in the previous quarter has been placed before Board of Directors.	Yes
9	Any comments/observations/advice of Board of Directors may be mentioned here:	Add Notes

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Sr	Subject	Compliance status
1	Name of signatory	Mr. Satyendra Chauhan
2	Designation	Company Secretary and Compliance Officer

Details of Cyber security incidence		
Whether as per Regulation 27(2)(ba) of SEBI (LODR) Regulations, 2015 there has been cyber security incidents or breaches or loss of data or documents during the quarter		No
Other details of cyber security incidence or breaches or loss of data event		<div>Add Notes</div>
Number of cyber security incidence or breaches or loss of data event occurred during the quarter		
Sr.	Date of the event	Brief details of the event

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Signatory Details

Name of signatory

Mr. Satyendra Chauhan

Designation of person

Company Secretary and Compliance Officer

Place

Gurugram

Date

29-07-2025

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Investor Grievance Details	
No. of investor complaints pending at the beginning of Quarter	0
No. of investor complaints received during the Quarter	0
No. of investor complaints disposed off during the Quarter	0
No. of investor complaints those remaining unresolved at the end of the Quarter	0

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Disclosure of Imposition of Fine or Penalty					
The details of imposition of fine or penalty during the quarter in terms of sub-para 20 of para A of Part A of Schedule III are given below:					
Any Other Information for Disclosure of Imposition of Fine or Penalty					Add Notes
Sr. No.	Name of the authority	Nature and details of the action(s) taken or order(s) passed	Date of receipt of direction or order, including any ad interim or interim orders, or any other communication from the authority	Details of the violation(s)/ contravention(s) committed or alleged to be committed	Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible
<div>AddDelete</div>					
1	West Bengal Clinical Establishment Regulatory Commission	Order to pay Rs.10000/- as penalty	09-06-2025	Medical Negligence (Arm sling not advised by the doctor to a patient who has undergone shoulder repairing procedure.	No Impact
2	Assesor and Collector S Ward (BMC) -Property Tax	As per Inspector inspection allegedly unauthorised construction of Pharmacy on waiting area	12-06-2025	Allegedly Unauthorised construction under section 152 A removed and a new invoice received with change in the user category fees under section 154 -1 D Municipal Corporation Act 1888	Penalty of 7,65,932 imposed

Disclosure of Updates to Ongoing Tax Litigations or Disputes				
The updates on tax litigations or disputes in terms of sub-para 8 of para 8 of Part A of Schedule III read with corresponding provisions of Annexure 18 of the Master Circular are given below:				
Any Other Information for Disclosure of Updates to Ongoing Tax Litigations or Disputes			Add Notes	
Sr.	Name of the opposing party	Date of initiation of the litigation / dispute	Status of the litigation / dispute as per last disclosed	Current status of the litigation / dispute
1	Income Tax Department	09-08-2021	On appeal by the Company (Fortis Hospitals Limited) for Assessment Year 2017-18, Case was referred to Transfer Pricing Officer (TPO) for Transfer Pricing (TP) Assessment. TPO has passed order on 20.01.2021 with no adverse inference. Later on, Assessing Officer (AO) has passed assessment order dt. 09.08.2021 making Disallowance: Rs.3,26,81,835 u/s 14A Rs.28,67,7142 - unexplained cash credit u/s 68 computed as per section 120BEC @ 50%. Amount under litigation is Rs. 38,56,61,808 and the matter is currently pending before Commissioner of Income Tax (Appeals).	No change
2	Income Tax Department	29-09-2021	On appeal by the Company (Fortis Hospitals Limited) for Assessment Year 2019-20, Assessment was completed vide order dated 19.09.2021 making disallowances on account of 14A + w Rule 8D at Rs.3,37,38,809/- (disallowance of bad debts at Rs.29,49,03,000/-) Advances from customers/patients at Rs.4,04,11,200/- (disallowance of ICDs based on SBI order at Rs.602,49,42,000/-) Assessing income at Rs. 108,58,49,850/- as against loss at Rs.387,38,53,580/- Amount under litigation is Rs. 48,24,72,129 and the matter is currently pending before Commissioner of Income Tax (Appeals).	No change
3	Income Tax Department	11-02-2020	On appeal by the Company (Fortis Hospitals Limited) for Assessment Year 2015-16, Case was referred to Transfer Pricing Officer (TPO) for Transfer Pricing (TP) Assessment. TPO has passed order proposing adjustment. Later on, Assessing Officer (AO) has passed assessment order confirming the adjustment proposed in TP Order, being interest amount paid on Compulsorily Convertible Debentures (CCDs) issued by the company. Amount under litigation is Rs. 71,18,68,980 and the matter is currently pending before Commissioner of Income Tax (Appeals).	No change
4	Income Tax Department	03-06-2021	On appeal by the Company (Fortis Hospitals Limited) for Assessment Year 2017-18, Case was referred to Transfer Pricing Officer (TPO) for Transfer Pricing (TP) Assessment. TPO has passed order proposing adjustment. Later on, Assessing Officer (AO) has passed assessment order confirming the adjustment proposed in TP Order, being interest amount paid on Compulsorily Convertible Debentures (CCDs) issued by the company. Amount under litigation is Rs. 56,11,28,717 and the matter is currently pending before Commissioner of Income Tax (Appeals).	No change
5	Income Tax Department	24-11-2021	On appeal by the Company (Fortis Hospitals Limited) for Assessment Year 2018-19, Case was referred to Transfer Pricing Officer (TPO) for Transfer Pricing (TP) Assessment. TPO has passed order on 30.07.2021 proposing adjustment amounting to INR 14,43 Cr which is interest expense claimed on Compulsorily Convertible Debentures (CCDs) issued by the company to FORTIS and consultancy expenses on the same. Later on, Assessing Officer (AO) has passed assessment order dt. 24.11.2021 confirming the adjustment proposed in TP Order. Amount under litigation is Rs. 83,26,19,748 and the matter is currently pending before Commissioner of Income Tax (Appeals).	No change
6	Income Tax Department	28-03-2005	In case of Escorts Heart Institute and Research Centre Limited, On appeal by the Department for Assessment Year 2001-02, Assessment was done u/s 140(1)(a) on 24.09.2001. The Assessing Officer responded the assessment and passed the assessment order dated 28.03.2005 making an addition of Rs.348.09 crore. The Assessing Officer held that registration of a company as a company under Act of the Companies Act tantamount to a transfer of assets and hence alleged addition on account of capital gain has been made. The company's appeal allowed by Income tax appellate tribunal, however has filed appeal before Delhi High Court. Amount under litigation is Rs. 1,05,32,00,000 and the matter is currently pending before Delhi High Court.	No change
7	Income Tax Department	15-02-2017	In case of International Hospital Limited for Assessment Year 2013-14, Case was referred to Transfer Pricing Officer (TPO) for Transfer Pricing (TP) Assessment. TPO has passed order on 11.10.2018 proposing adjustment amounting to INR 588 million which is interest expense claimed on Compulsorily Convertible Debentures (CCDs) issued by the company to FORTIS. Later on, Assessing Officer (AO) has passed assessment order dt. 15.02.2017 confirming the adjustment proposed in TP Order and also making Disallowance u/s 14A and with rule 8D amounting to INR 60 million and u/s 10(1)(a) amounting to INR 0.26 million. An appeal filed before the Commissioner of Income Tax (Appeals), New Delhi on 01.03.2017 has been decided. Further appeal filed before ITAT on 18.04.2018. Departmental also in appeal. Demand raised at Rs.15,01,91,880/- vide order passed u/s 143(3), the same was revised at Rs.34,18,73,940/- vide order dated 27.08.2018 passed u/s 154. Amount under litigation is Rs. 34,18,73,940/- and the matter is currently pending before Income Tax (Appeals).	No change
8	Income Tax Department	10-05-2021	In case of International Hospital Limited for Assessment Year 2017-18, Case was referred to Transfer Pricing Officer (TPO) for Transfer Pricing (TP) Assessment. TPO has passed order dated 11.05.2021 proposing adjustment of Rs.62,08,71,712/- Later on, Assessing Officer (AO) has passed assessment order u/s 143(3) dated 10.05.2021 confirming the adjustment proposed in TP Order and making further Disallowance u/s 14A and with rule 8D and u/s 10(1)(a) at Rs.71,00,77,700/- and u/s 10(1)(a) at Rs.10,71,27,712/- thereby raising a demand of Rs.39.80Cr. Amount under litigation is Rs. 39,80,18,838/- and the matter is currently pending before Commissioner of Income Tax (Appeals).	No change
9	Income Tax Department	26-11-2021	In case of International Hospital Limited for Assessment Year 2018-19, Case was referred to Transfer Pricing Officer (TPO) for Transfer Pricing (TP) Assessment. TPO has passed order dated 18.07.2021 proposing adjustment of Rs.23,18,64,290/- Later on, Assessing Officer (AO) has passed assessment order u/s 143(3) dated 25.11.2021 confirming the adjustment proposed in TP Order and making further Disallowance u/s 143(3)(i) at Rs.75,05,77,678/- and u/s 10(1)(a) at Rs.12,00,000/- thereby raising a demand of Rs.36.75Cr. Amount under litigation is Rs. 1,87,38,23,640 and the matter is currently pending before Commissioner of Income Tax (Appeals).	No change
10	Income Tax Department	21-03-2024	Fortis Hospitals Limited, a material subsidiary of the Company has received an Income Tax assessment order for Assessment Year 2022-23 (Financial Year 2021-22), wherein a demand of Rs.8,813 Crores (including interest of Rs.214 Crores) has been raised. The matter is currently pending before Commissioner of Income Tax (Appeals).	No change
11	Office of the Principal Commissioner* GST, Gurugram	18-07-2024	GST Department of Haryana has issued Show Cause Notice alleging that the company i.e. Fortis Hospitals Limited is charging MBP from IPD patients for medicines, consumables and implants which include GST and not remitting the same to government exchequer. Thus, the subsidiary Company i.e. Fortis Hospitals Limited has filed the writ petition by challenging the show cause notice issued by the Office of the Principal Commissioner, GST, Gurugram. Amount under litigation is Rs.61.19 Crore plus interest and penalty and the matter is currently pending before Punjab and Haryana High Court.	No change
12	Income Tax Department	03-04-2025	In case of International Hospital Limited, Income Tax Demand order amounting to Rs.79,19,13,979/- has been issued to HFL vide Order under Section 140(1)(a)(i) read with section 140B of the Income Tax Act, 1961 in regard of Assessment year 2019-20 (Financial year 2018-19). An Appeal before Commissioner of Income Tax (Appeals) has been filed on 30.04.2025 and the matter is currently pending.	An Appeal before Commissioner of Income Tax (Appeals) has been filed on 30.04.2025 and the same is currently pending.
13	ICIT	30-11-2018	Pending before CIT(A) / NFAC. Appeal has been filed on 30.04.2025 and the matter is currently pending.	Dismissed off in favour of assessee by Order of CIT (A), dated 27.09.2024. However ICIT, Income Tax - Gurugram filed an appeal before ITAT.
14	ICIT	28-01-2018	Pending before CIT(A) / NFAC.	Now the matter is pending with ITAT.
15	ICIT	24-02-2019	Pending before CIT(A) / NFAC.	Pending before CIT(A) / NFAC.
16	ACT	30-06-2020	Pending before CIT(A) / NFAC.	Pending before CIT(A) / NFAC.