

**PepsiCo India and its AMP expenses -
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for benchmarking**



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In the recent ruling of Hon'ble Delhi High Court (HC) in the case of *Pr. CIT v. Pepsico India Holding Pvt. Ltd.*¹ involving the issue of marketing intangibles, it was held that the AMP computation (i.e. computation of advertisement, marketing and sales promotion expenses) which was based on the adoption of the Bright Line Test (BLT), would clearly not sustain in light of the judgement rendered by the Court in *Sony Ericson v. CIT*². Thus, the case did not find any merits and same was dismissed.

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