

**GUJARAT AUTHORITY FOR ADVANCE RULING
GOODS AND SERVICES TAX
D/5, RAJYA KAR BHAVAN, ASHRAM ROAD,
AHMEDABAD – 380 009.**



ADVANCE RULING NO. GUJ/GAAR/R/2025/50
(IN APPLICATION NO. Advance Ruling/SGST&CGST/2025/AR/27)

Date: 19/ 11/2025

Name and address of the applicant	:	Sweet Spot Spaces 4-D, Vardan Tower, Forth Floor, Lakhudi Circle, Ahmedabad, Gujarat-380009
GSTIN of the applicant	:	24AFHFS7388R1ZV
Jurisdiction Office	:	Center Commissionerate- Ahmedabad South Division – VI, Vastrapur Range –V
Date of application	:	24.07.2025
Clause(s) of Section 97(2) of CGST/IGST Act, 2017, under which the question(s) raised.	:	(f)
Date of Personal Hearing	:	16.10.2025
Present for the applicant	:	Shri Samir I. Siddhapuria, Advocate

Brief facts:

M/s. Sweet Spot Spaces, 4-D, Vardan Tower, Forth Floor, Lakhudi Circle, Ahmedabad, Gujarat-380009 [for short – ‘*applicant*’] is registered under GST and their GSTIN is 24AFHFS7388R1ZV.

2. The applicant is engaged in providing co-working as well as virtual office services, including sub-leasing of office spaces as virtual addresses to its various clients, primarily e-commerce sellers and service providers, operating across India, startup entrepreneur etc. The facilities offered include video conferencing, mailing, GST registration support and authorised representative services. The applicant provides its premises as the “Principal place of Business” (PPOB) for their clients ensuring compliance with statutory record maintenance, KYC and Aadhar verification norms. The applicant maintains all statutory records and ensures compliance with KYC and Aadhar verification norms for each client.

3. The applicant has sought an advance ruling on the following question: -



Whether GST registration can be granted to multiple unrelated business, each allotted a distinct, identifiable and demarcated seat with unique seat numbers and time slots, at the same address as their "Principal Place of Business", provided that:

- *The address is used as a virtual office, allotted for a fixed time slot per day, week or fortnight (e.g. one hour, two hours or more as mentioned in the leave and licence agreement).*
- *Proper documentation such as sub-rental/sub-lease agreements is executed and available.*
- *Books of accounts are maintained and managed by the service provider firm and/or an authorised representative on behalf of the taxpayer upon grant of GST registration.*
- *The clients are either legitimate service providers and /or suppliers of goods and /or both/e-commerce sellers working remotely from various states.*
- *Applicant raises an invoice to the clients.*
- *No physical stock is stored at the premises; however, the client will provide the address of a warehouse either of his own/rental or belonging to an e-commerce operator (e.g. Amazon, Flipkart) as their additional place of business.*

4. The applicant has submitted that they have obtained a leased premises at 4-D, Vardan Tower, Fourth Floor, Lakhudi Circle, Ahmedabad, Gujarat-380009, for long term lease through a registered lease deed with the owner of the property. The prospective clients approach the applicant directly or via aggregators or through consultants to occupy virtual space or co-working spaces on an hourly or weekly or monthly basis, as per their business needs. Due to the de-centralised nature of online e-commerce business, sellers require state -wise GST registration for seamless movement of goods through e-commerce operator having warehouses across India. Establishing a full-fledged office in each state is economically and operationally not viable and burdensome. Therefore, the concept of virtual office concept has been developed world wide, which is also gaining momentum in India.

5. The Applicant further submitted that they have developed a compliant virtual office model, including:



- Provision of business address with unique, demarcated, and identifiable desk/suite numbers;
- Facility for signage and official communication;
- Digital and/or physical document storage;
- Mail handling;
- Access to video conferencing rooms;
- Support for GST, ROC, or other business registrations;
- Electronic maintenance of books of accounts through authorized representatives under Section 116 of the CGST Act.

However, no goods or inventory will be stored at the premises, and no physical trade operations will be conducted from the virtual office. The Leave and license agreements specifically permit clients to use the premises address as their Principal Place of Business or additional place of businesses under the GST Act. The clients are responsible for the GST Act compliance. The clients apply for GST registration in accordance with Sections 22, 24, and 25 of the GST Act and provide all the prescribed documentation (including Form REG-1).

6. The applicant has further quoted the following Advance Rulings on the issue.

(i) *Space lance Office Solutions (P.) Ltd.*, - re [2019] 108 taxmann.com B. 234 (AAR - Kerala)- wherein it has been held that there is no prohibition under GST law for obtaining registration as a shared or virtual office space, if the landlord permits sub-leasing and proper documentation is maintained. Each co-working space must be demarcated and have a unique identity, and books of account must be maintained at the principal place of business.

(ii) *M/s Easy Work*, Advance Ruling No. HR/HAAR/18/2021-22 dated 14.07.2021-wherein it has been reiterated that GST registration can be granted for co-working spaces, provided separate agreements and compliance with documentation requirements are ensured.

7. Personal hearing was granted on 16.10.2025 Shri Samir I. Siddhapuria, Advocate appeared on behalf of the applicant and reiterated the facts & grounds as stated in the application.



Discussion and findings

8. At the outset, we would like to state that the provisions of both the CGST Act and the GGST Act are the same, except for certain provisions. Therefore, unless a mention is specifically made to such dissimilar provisions, a reference to the CGST Act would also mean a reference to the same provisions under the GGST Act.

9. We have considered the submissions made by the applicant in their application for advance ruling as well as the submissions made both oral and written during the course of personal hearing. We have also considered the issue involved, the relevant facts & the applicant's submission/interpretation of law in respect of question on which the advance ruling is sought.

10. We find that the applicant, registered tax payer, has taken a premise on lease and want to provide further this premise to various prospective clients who need virtual or co-working spaces on an hourly or weekly or monthly basis. The applicant wants to know whether registration can be granted to virtual or co-working spaces. However, prior to dealing with the question raised by the applicant, we deem it necessary to go through Section 95(a) of the CGST Act, 2017.

Section 95: In this Chapter, unless the context otherwise requires, - (a) "advance ruling" means a decision provided by the Authority or the Appellate Authority to an applicant on matters or on questions specified in sub-section (2) of Section 97 or sub-section (1) of Section 100, in relation to the supply of goods or services or both being undertaken, or proposed to be undertaken by the applicant.

[emphasis supplied]

Thus, a ruling can be sought only on those issues in relation to the supply of goods or services or both being undertaken, or proposed to be undertaken by the applicant. We find that the ruling sought by the applicant is not for them but for their clients to whom the applicant lets out their premises. The question, which is sought, is whether these clients can be granted registration or otherwise. Thus, their query does not fall under the ambit of Section 95.

11. Secondly, Section 97 (2) of the CGST Act lays down the issues on which the advance ruling can be sought, which is reproduced below:

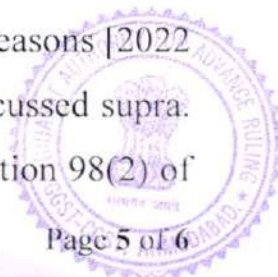


(2) *The question on which the advance ruling is sought under this Act, shall be in respect of, -*

- (a) *classification of any goods or services or both;*
- (b) *applicability of a notification issued under the provisions of this Act;*
- (c) *determination of time and value of supply of goods or services or both;*
- (d) *admissibility of input tax credit of tax paid or deemed to have been paid;*
- (e) *determination of the liability to pay tax on any goods or services or both;*
- (f) *whether applicant is required to be registered;*
- (g) *whether any particular thing done by the applicant with respect to any goods or services or both amounts to or results in a supply of goods or services or both, within the meaning of that term.*

We find that the question on which advance ruling is sought does not fall under any of the above issues. The applicant in their application at Sl.No. 13 has ticked the box under '*whether applicant is required to be registered*'. However, we find that question on which ruling is sought is not whether the applicant is required to be registered but is whether multiple registrations can be granted at the same premises to the applicant's clients. The applicant is already registered under GST, so the issue under which the applicant seeks the ruling is not correct. Further, it is also not a question regarding the requirement of registration but whether multiple registrations can be granted at the same premises. Thus, on this count also the advance ruling sought by the applicant is not proper.

12. Thirdly, as per Section 103 of the CGST Act, the ruling pronounced by the advance ruling authority is binding on the applicant. It is not understood as to how an advance ruling given to the applicant would help their client's cause. The applicant has relied upon the Advance rulings of Kerala Advance Ruling Authority in the case of *Space lance Office Solutions (P.) Ltd.* as well as of the Haryana Advance Ruling Authority in the case of *M/s Easy Work*. We find that in both these cases, the Advance Ruling Authority has not examined the aspects and the admissibility, which we have mentioned in the preceding paras. Further, *Space lance Office Solutions (P.) Ltd.* had sought a similar ruling before the Tamil Nadu Advance Ruling Authority. However, the Authority did not admit the application filed by them under Section 98(2) of the CGST Act, 2017 for similar reasons [2022 (61) G.S.T.L. 380 (A.A.R. - GST - T.N.)], which we have already discussed supra. We, therefore, do not admit the application of the applicant under Section 98(2) of




the Act, for the reason that it does not fall under any of the issues mention in Section 97(2) of the Act, *ibid*.

13. In view of the foregoing, we rule as under: -

RULING

The application filed by the applicant is rejected, as not admitted under Section 98(2) of the CGST Act, 2017, for the reasons mentioned aforesaid.


(Sushma Vora)
Member (SGST)

Place: Ahmedabad
Date: 19.11.2025




(Vishal Malani)
Member (CGST)