NEWSLETTER

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NEWSLETTER FOR NOVEMBER 25 VOLUME 15, ISSUE 11

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COMPLIANCE

NOVEMBER 2025 DUE DATES

GST

DATE

COMPLIANCE DETAIL

APPLICABLE TO

10th

- GSTR-7 (TDS return under GST)
- GSTR-8 (TCS return under GST)
- Person required to deduct TDS under GST
- Person required to collect TCS under GST

11th

- GSTR-1 (Outward supply return)
- Taxable persons having annual turnover > Rs. 5 crore in FY 2024-25
- Taxable persons having annual turnover ≤ Rs. 5 crore in FY 2024-25 and not opted for Quarterly Return Monthly Payment (QRMP) Scheme

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- GSTR-6 [Return by input service distributor (ISD)]
- Person registered as ISD

13th

- GSTR-5 (Return by Nonresident)
- Invoice Furnishing Facility -IFF (Details of outward supplies of goods or services)
- Taxable persons having annual turnover ≤ Rs. 5 crore in FY 2024-25 and opted for Quarterly Return Monthly Payment (QRMP) Scheme

Non-resident taxable person (NRTP)

20th	• GSTR-3B (Summary return)	 a) Taxable persons having annual turnover > Rs. 5 crore in FY 2024-25 b) Taxable persons having annual turnover ≤ Rs. 5 crore in FY 2024-25 and not opted for QRMP scheme
	GSTR-5A [Online Information Database Access and Retrieval (OIDAR) services return]	OIDAR services provider
25th	Form GST PMT-06 (Payment of tax for QRMP filers)	• Taxable persons having annual turnover ≤ Rs. 5 crore in FY 2024-25 and opted for QRMP scheme
30th	 Availment of Unclaimed ITC under GST for FY 2024-25 b) Issue of Credit Notes under GST where invoices pertain to FY 2024-25 	All taxpayers registered under GST.
INCOM TAX	E	
DATE	COMPLIANCE DETAIL	APPLICABLE TO
7th	• TDS / TCS deposit	Non-Government Deductors
10th	Tax Audit Report (where Transfer Pricing is not applicable)	 Corporates Non corporates (whose accounts are required to be audited) Partner of a firm whose accounts are required to be audited
	Deposit of PF & ESI contribution	All Deductors
15th	TDS certificate in Form 16A (non-salary)	All Collectors

• a) Corporate Income-tax Return (where Transfer Pricing is applicable)

b) Report in Form 3CEAA (Master File)
 u/s 92D(4) of Income-tax Act

- c) Form 3CEFA for exercising option of safe harbour rules for international transaction
- d) Form 3CEFB for exercising option of safe harbour rules for specified domestic transaction

 All taxpayers subject to Transfer Pricing regulations as per Income-tax Act, 1961

CORPORATE

29th

30th

- Filing of Form PAS-6 (Reconciliation of share capital) with MCA
- Companies whose securities are in demat form







NOTIFICATION, CIRCULAR AND INSTRUCTION ISSUED DURING OCTOBER 2025 BY CBIC

• NOTIFICATION NO 17/2025- GST, DATED 18.10.2025

Notification Category: GSTR-3B, Date Extension

Impacted Section / Rules: Section 39 of the CGST Act, 2017

Summary:

Time limit for furnishing the monthly return in FORM GSTR-3B for the month of September, 2025 has been extended till 25th October 2025. Also, GSTR-3B for the quarter of July 2025 to September 2025, till 25.10. 2025.

• NOTIFICATION NO 18/2025- GST, DATED 31.10.2025

The CBIC has issued a Notification No. 18/2025–Central Tax dated 31.10.2025, to introduce a new mechanism under the CGST Rules, 2017 to facilitate Aadhaar-based registration for certain categories of persons. The newly inserted Rule 14A provides introduces an optional simplified registration mechanism for small taxpayers whose total monthly output tax liability does not exceed ₹2.5 lakh. This amendment seeks to strengthen the authenticity of registrations and streamline the withdrawal process, aligning it with risk-based verification parameters. Also, CBIC has inserted a new Rule 9A, to introduce risk-based electronic grant of registration, leveraging data analytics and portal-driven identification mechanisms.

RULE NO./ FORM NO.	PARTICULARS	IMPACT
NEWLY INSERTED 9A	Grant of registration electronically.	Rule 9A applies to applicants seeking registration under Rule 8 (Normal taxpayer registration); Rule 12 (Registration for persons required to deduct or collect tax at source (TDS/TCS); Rule 17 (Registration for non-resident taxable persons). The GST portal will use data analysis and risk parameters to identify low-risk applicants eligible for automated approval. Registration must be granted within three working days from the date of submission of the application.

NEWLY INSERTED 9B

OPTIONAL
ELECTRONIC
REGISTRATION
FOR SMALL
TAXPAYERS
WITH MONTHLY
OUTPUT TAX
LIABILITY
BELOW #2.5 LAKH

Rule 14A introduces an optional simplified registration mechanism for small taxpayers whose total monthly output tax liability does not exceed ₹2.5 lakh. The rule enables electronic, Aadhaar-based registration to be granted within three working days. Key pointers

- Applicable to persons whose total monthly output tax liability (Central, State/UT, IGST & cess combined) does not exceed ₹2.5 lakh. Applies only to supplies made to registered persons (B2B transactions)
- Aadhaar authentication is compulsory (except for those notified under Section 25(6D)). Without Aadhaar authentication, registration under this rule is not permitted.
- Only one registration per State/UT per PAN is allowed under this rule.
- On successful Aadhaar verification, registration is granted electronically within 3 working days from application submission.
- Taxpayer may opt out through Form GST REG-32, after filing minimum required returns. Proper officer issues order in Form GST REG-33 (approval) or REG-05 (rejection).
- Taxpayer must maintain output tax liability within ₹2.5 lakh/month while under this scheme. Exceeding the limit requires withdrawal; higher liability can be declared from the following month.
- Based on data analytics and risk parameters available on the GST portal. Biometric and document verification provisions (Rule 8(4A)) apply for withdrawal cases.
- Cannot file withdrawal if proceedings under Section
 29 (cancellation of registration) are pending.
 Application to withdraw rejected if cancellation proceedings are active.

FORM GST REG-01

AMENDMENT TO FORM GST REG-01 **Incorporation of Option under Rule 14A**

FORM GST REG-02

AMENDMENT TO FORM GST REG-02

Reference to Rule 14A. This ensures that REG-02 acknowledges applications submitted under Rule 14A in addition to the existing Rule 8(5) applications.

FORM GST REG-03	AMENDMENT TO FORM GST REG-03	Incorporating Rule 14A – formalizing the process for issuing notices for additional information or clarification to applicants under the small-taxpayer optional registration scheme.
FORM GST REG-04	AMENDMENT TO FORM GST REG-04	Incorporating Rule 14A
FORM GST REG-05	AMENDMENTS TO FORMS GST REG-05	Incorporating Rule 14A
NEWLY INSERTED FORM GST REG-32	APPLICATION FOR WITHDRAWAL	Comprehensive framework for rejection and withdrawal applications for small taxpayers.
FORM GST REG-33	ORDER OF WITHDRAWAL FROM OPTION AVAILED UNDER SUB- RULE (1) OF RULE 14A	Formalizes acceptance of withdrawal from Rule 14A registration option.

• <u>NOTIFICATION NO 18/2025- CGST, IGST & UTGST (RATE),</u> <u>DATED 24.10.2025</u>

Notification Category: Notification-CT, IT & UTGST(Rate) (Other)

Impacted Section / Rules: Notification No. 26/2018-Central Tax (Rate) & Notification No. 27/2018-Integrated Tax (Rate)

Effective Date: - November 1, 2025

SUMMARY:

The CBIC has issued Notification No. 18/2025–Central Tax (Rate), Integrated Tax (Rate) to amend Notification No. 26/2018–Central Tax (Rate) & Notification No. 27/2018–Integrated Tax (Rate) dated 31.12.2018.

There is also a Notification No. 18/2025 - Central Tax (Rate), Integrated Tax (Rate) issued on October 31, 2025, which introduces the Central Goods and Services Tax (Fourth Amendment) Rules, 2025, to implement a technology-driven, faster GST registration process within three working days.

CIRCULAR NO 253/10/2025- GST, DATED 01.10.2025

IMPACTED SECTION / RULES: SECTION 15(3)(B)(II) OF THE CGST ACT, 2017 WITH CIRCULAR NO. 212/6/2024-GST

SUMMARY:

The Central Board of Indirect Taxes and Customs (CBIC) has issued Circular No. 253/10/2025-GST dated 1st October 2025, withdrawing its earlier Circular No. 212/6/2024-GST dated 26th June 2024.

The earlier circular had prescribed a procedure for suppliers to prove compliance with Section 15(3)(b)(ii) of the CGST Act, 2017, particularly with respect to reversal of Input Tax Credit (ITC) by the recipients.

Post-Sale Discounts and ITC Reversal: CBIC Removes Requirement of CA Certificates from Recipients. This move is significant because it reduces compliance burdens on suppliers and restores reliance on the statutory language itself, without insisting on extra procedural evidence.

CIRCULAR NO 254/11/2025- GST, DATED 27.10.2025

NOTIFICATION CATEGORY: PENALTY/INTEREST/FEE WAIVER, DEMAND AND RECOVERY

IMPACTED SECTION / RULES: SECTION 74A, 122 OF THE CGST ACT, 2017

SUMMARY:

The CBIC has issued Circular No. 254/11/2025-GST dated 27.10.2025, exercising powers under Clause (91) of Section 2 of the CGST Act read with Section 20 of the IGST Act, assigning functions and prescribing monetary limits for proper officers to issue show cause notices (SCNs) and adjudicate orders under Section 74A (newly inserted) and Section 122 of the CGST Act, 2017.

A.PROPER OFFICERS ASSIGNED

Additional/Joint Commissioner, Deputy/Assistant Commissioner, and Superintendent of Central Tax – This clarification was necessary because no proper officer had been previously assigned for these specific provisions, which deal with the determination of tax short-paid from FY {2024-25} onwards (Sec. 74A), redetermination of tax when fraud is not established on appeal (Sec. 75(2)), and the imposition of penalties for various offences (Sec. 122)

Page no. :- 7

B. MONETARY LIMITS FOR ADJUDICATION

Officer	Section 74A – Tax Demand Limit	Section 122 – Penalty Limit
Superintendent	Up to Rs. 10 lakh (CGST)/ Rs. 20 lakh (IGST or combined)	Up to Rs. 10 lakh (CGST) / Rs. 20 lakh (IGST or combined)
Deputy/Assistant Commissioner	Above Rs. 10 lakh & up to Rs. 1 crore (CGST)/ Rs. 2 crore (IGST or combined)	Above Rs. 10 lakh & up to Rs. 1 crore (CGST)/ Rs. 2 crore (IGST or combined)
Additional/Joint Commissioner	Above Rs. 1 crore (CGST) / Rs. 2 crore (IGST or combined)	Above Rs. 1 crore (CGST) / Rs. 2 crore (IGST or combined)

C. Additional Clarifications

- Combined Tax Basis: Where a show cause notice under Sections 73, 74, or 74A involves both Central Tax and Integrated Tax (including cess), the determination of the proper officer shall be based on the combined amount of tax, regardless of individual tax components. Also, where a Show Cause Notice under Section 122 of the CGST Act, 2017 involving demand of penalty pertaining to both Central Tax and Integrated Tax, the proper officer shall be determined on the basis of the combined amount of penalty for both levies.
- Subsequent Statements (Sections 73/74/74A (3) & (4)): When additional tax periods are covered under Section 73, 74, or 74A, proper officers are determined based on the highest tax demand. If the demand in a later statement exceeds the earlier officer's monetary limit, a corrigendum shall be issued, and the case transferred to the higher-ranked officer competent to adjudicate. If no change in monetary limit occurs, the same officer continues to handle the case.

- Audit Commissionerates: For notices issued by Audit Commissionerates, any subsequent statements under Sections 73/74/74A (3) & (4) must be made answerable to the adjudicating authority mentioned in the original show cause notice.
- Section 75(2) Cases: When an appellate authority, tribunal, or court holds that a notice under Section 74(1) is not sustainable (due to failure to prove fraud, wilful misstatement, or suppression), the same adjudicating officer shall determine tax under Section 73(1).
- INSTRUCTION NO 06/2025- GST, DATED 03.10.2025

Notification Category: Guidelines/Instructions/ Refund Claim

Impacted Section / Rules: Section 54(6) of the CGST Act, 2017 with Rule 91(2) of the CGST Rules, 2017 and Notification No. 14/2025-Central Tax dated 17.09.2025.

Summary:

<u>Provisional sanction of refund claims based on system-identified risk</u> <u>evaluation", issued pursuant to the 56th GST Council Meeting (03.09.2025)</u> <u>and the amendment to Rule 91(2) of the CGST Rules, 2017</u>

Rule 91(2) of the CGST Rules, 2017 has been amended (vide Notification No. 13/2025-Central Tax dated 17.09.2025) to provide that 90% of refund claims may be provisionally sanctioned based on system-generated risk evaluation. A new proviso empowers the proper officer to withhold provisional refund and proceed for detailed examination for reasons recorded in writing. Further, Notification No. 14/2025-Central Tax dated 17.09.2025 notifies categories of registered persons not eligible for provisional refund under Section 54(6), particularly for zero-rated supplies. The amended provisions are effective from 01.10.2025.

KEY GUIDELINES ISSUED

- a. Risk-Based Categorization Refund applications will be evaluated by the system and categorized as "Low-risk" eligible for 90% provisional refund sanction: Others (non-low-risk) subject to detailed scrutiny before sanction. Risk categorization is system-generated and based on multiple data parameters (not disclosed for security reasons).
- b. Provisional Refund Sanction (Low-Risk Cases) For "low-risk" refund applications, 90% of the refund amount shall be sanctioned on provisional basis under Rule 91(2). No detailed scrutiny is required once acknowledgment in FORM GST RFD-02 is issued, unless covered by the proviso to Rule 91(2). The proper officer may still proceed with detailed examination if reasons are recorded in writing.
- c. Non-Low-Risk Cases For refund claims not categorized as "low-risk", no provisional refund shall be granted. Such cases will undergo detailed examination as per Rule 92 and existing guidelines.
- d. Caution in Using Proviso to Rule 91(2) The CBIC clarified that the new proviso (enabling officer to bypass provisional refund) must be used sparingly and only on case-to-case basis. Provisional refund should not be denied merely on presumptive or routine grounds like scrutiny initiation or pendency of minor proceedings.
- e. Excess Refund Recovery If, upon final examination, the provisionally sanctioned refund exceeds the admissible amount, recovery will be initiated through FORM GST RFD-08, invoking Sections 54, 73, 74 or 74A.

The CBIC has directed that the trade facilitation intent must be implemented in letter and spirit; the proviso to Rule 91(2) must not be routinely invoked; Jurisdictional officers must ensure timely sanction of eligible refunds and prompt recovery where excess refund arises.

NEWS & UPDATES

• Advisory on IMS, Dated - 08.10.2025

Notification Category: GSTR-3B

Summary:

The clarification was issued to counter misleading posts and misinformation circulating about supposed changes in GST return filing from October 1, 2025.

The Advisory provides as under:

- No Change in ITC Auto-Population The Input Tax Credit (ITC) mechanism remains unchanged. ITC will continue to auto-populate from GSTR-2B to GSTR-3B as before, even after the implementation of IMS. Taxpayers need not take any manual action for this process.
- Uninterrupted GSTR-2B Generation GSTR-2B will continue to be autogenerated on the 14th of every month, without requiring any taxpayer intervention. Taxpayers may, however, perform actions in IMS postgeneration and regenerate GSTR-2B if needed before filing GSTR-3B.
- Credit Note Flexibility Introduced (Effective October 2025 Onwards) –
 Recipients will have the option to keep Credit Notes or related documents
 pending for a defined period and can accept them later. Upon acceptance,
 the ITC reversal can be adjusted manually to the extent of credit already
 availed.

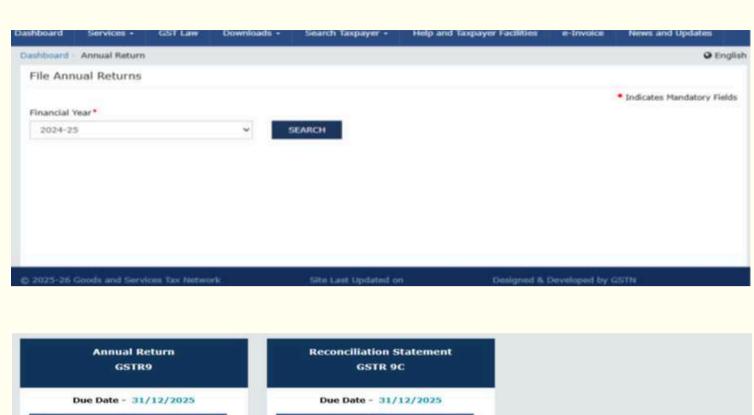


ADVISORY FOR GSTR 9/9C FOR FY 2024-25, DATED - 15.10.2025

Notification Category: Annual returns - GSTR-9/9C

Summary:

GSTR-9/9C for FY 2024-25 has been enabled on the GST portal from 12th October 2025.





• <u>ADVISORY FOR FAQ'S ON GSTR 9/9C FOR FY 2024-25,DATED - 15.10.2025</u>

Notification Category: Annual returns - GSTR-9/9C

Summary:

GSTR- 9/9C is now available to taxpayers for filing. A list of Frequently Asked Question along with the response has been compiled and is intended to assist the Taxpayer in better understanding of various Tables of GSTR-9/9C and their key aspects – such as reporting of various values in Tables.

S. No.	Query	GSTN Reply
1.	When my GSTR 9/9C for FY 2024- 25 will be enabled?	Once all the due returns in Form GSTR-1 and GSTR-3B for the FY 2024-25 is filed, GSTR 9/9C for FY 2024-25 will be enabled in the system automatically.
2.	If any GSTR 1 and GSTR 3B is pending for the FY 2024-25 then will my GSTR 9 is enabled?	No GSTR 9 will not be enabled where any GSTR-1 and GSTR-3B is pending for the FY 2024-25. All the relevant cells of Table4,5,6,8 and 9 of GSTR 9 will be auto populated based on the statement / return filed by you i.e. GSTR 1/1A/IFF or GSTR 2B or GSTR 3B.
3.	What is table 8A of GSTR 9 and how it will be auto populated?	Table 8A of GSTR 9 for FY 2024-25 capture the details of documents / recordspertaining to FY 2024-25 appearing in GSTR 2B. Therefore, Table 8A of GSTR 9 will include all the inward supplies pertaining to FY 2024-25 appearing in GSTR 2B of FY 2024-25 and will 1. Also include the invoices pertaining to FY 2024-25 appearing in GSTR 2B of next year 2025-26 between April 2025 to October 2025 and 2.exclude the invoices pertaining to previous FY 2023-24 appearing in GSTR 2B between April 2024 to October 2024.
4.	Is there any impact on GSTR-9 due to action taken on IMS Dashboard?	IMS does not have direct impact on GSTR 9. The documents/records which are accepted or deemed accepted would have appeared in GSTR 2B and hence will form part of Table 8A of GSTR 9 for FY 2024-25 as discussed at Sr. No. 3. As GSTR 9 will take the data from GSTR 2B where GSTR 3B has already filed.

Will the supplies Yes, from FY 2024-25 the supplies added / amended added / amended through GSTR 1A will also be considered along with GSTR 5. 1 and IFF for the purpose of auto population in Table 4, 5 through GSTR 1A be considered for of GSTR 9. auto population of value in Table 4/5 of GSTR 92 What is table 6A1 Table 6A1 of GSTR 9 for FY 2024-25 capture the ITC of and which 6. preceding FY (2023-24) claimed by the recipient in the amount current FY (2024-25) till the specified time period and it required to be is also included in Table 6A of GSTR 9 for FY 2024-25. reported? However, any ITC pertaining to FY 2023-24 or any other preceding financial years, which has been reclaimed during current FY (2024-25) on account of rule 37 / 37A will not be reported in Table 6A1 of GSTR 9. Therefore, the amount calculated in Table 6A2 (6A minus 6A1) is the ITC pertaining to current FY (2024-25) which need to be bifurcated between 6B to 6H. As the ITC of preceding FY (2023-24) has been excluded through Table 6A1 therefore it will not create the difference in Table 6J of GSTR 9 as the case was with GSTR-9 till FY 2023-24. How the value of Table 6A of GSTR 9, is auto populated from Table 4A (1 to **ITC** will 5) of GSTR 3B for entire FY from April 2024 to March 7. be reported if **ITC** 2025. Therefore, in the given case this amount will pertaining to FY appear twice in Table 6A of GSTR 9 i.e. once for claim and 2024-25 has been second for reclaimed amount. In such cases these three claimed, reversed events should be reported as below and reclaimed in • claim should be reported in Table 6B, the same FY reversal should be reported in Table 7 (Table 7A to 7H, 2024-25? as the case may be) and reclaimed should be reported in 6H. Example 1 - Mr A has claimed Rs 100 (IGST) in the month of April 2024 and reversed the same in October 2024 due to non-payment to Supplier within 180 days as per rule

as under -

37 of CGST Rule 2017. The same has been reclaimed in March 2025 as payment has been made on 4th March 2025. The reporting will be in the GSTR 9 for FY 2024-25

Original claim in Table 6B of GSTR 9 for FY 2024-25
 Reversal of same in Table 7A of GSTR 9 for FY 2024-25

3. Reclaim in Table 6H of GSTR 9 for FY 2024-25

of April 2024 and reversed the same in April 2024 due to nonreceipt of goods as per Circular No. 170/02/2022-GST 6th July 2022. The same has been reclaimed in May 2024 as goods has been received on 4th May 2024. The reporting will be in the GSTR 9 for FY 2024-25 as under -1. Original claim in Table 6B of GSTR 9 for FY 2024-25 2. Reversal of same in Table 7H of GSTR 9 for FY 2024-25 3. Reclaim in Table 6H of GSTR 9 for FY 2024-25 How the value of ITC pertaining to preceding FY (2023-24) which has been **ITC** will 8. be claimed / reclaimed in this FY (2024-25) for any reason reported if ITC other than rule 37/37A, should be reported pertaining to FY in Table 6A1 as this ITC is also included in Table 6A 2023-24 has been above. claimed, Further, any ITC which is reclaimed for the reason rule reversed in FY 37/37A should be reported in 2023-24 and table 6H as this ITC is also included in Table 6A above. reclaimed in the Example 1 - If any ITC pertaining to preceding FY (2023-FY 2024-25? 24) was claimed and reversed in the preceding FY (2023-24) but reclaimed (Other than rule 37/37A like Circular No. 170/02/2022-GST 6th July, 2022 etc) in the current FY (2024- 25) till the specified time period (i.e. 30th November 2025) then such reclaimed ITC to be reported in the Table 6A1 of GSTR 9 for FY 2024-25. It will not come in the Table 6H of GSTR 9 of FY 2024-25. Example 2 - If any ITC pertaining to preceding FY (2023-24) was claimed and reversed in the preceding FY (2023-24) but reclaimed (due to rule 37/37A) in the current FY (2024-25) then such reclaimed ITC should not be reported in Table 6A1 of GSTR 9 for FY 2024-25. This need to be reported in Table 6H of GSTR 9 for FY 2024-25. How the value of Table 6A of GSTR 9, is auto populated from Table 4A (1 to 9. ITC will be 5) of GSTR 3B for entire FY from April 2024 to March 2025. reported if ITC As ITC was claimed and reversed in the FY 2024-25 itself then it will be reported in table 6B and reversal in Table 7 pertaining to FY 2024-25 has been of GSTR 9. In such cases these two events should be claimed, reported as below reversed in FY claim should be reported in Table 6B, reversal should be reported in Table 7 (Table 7A to 7H, 2024-25 and reclaimed in the as the case may be). FY 2025-26?

Example 2 - Mr A has claimed Rs 100 (IGST) in the month

For the reclaim the procedure will be based on whether reclaim is on account of rule 37/37A or reason otherwise, as below –

A. If the ITC which was reclaim in FY 2025-26 is because of other than rule 37/37A – Such reclaim will be reported in Table 13 of GSTR 9 for FY 2024-25 and table 6A1 of GSTR 9 of FY 2025-26 (in GSTR 9 of next Year). This will not be reported in Table 6H of GSTR 9 of 2025-26 (in GSTR 9 of next Year).

B. If the ITC which was reclaim in FY 2025-26 is because of reason rule 37/37A – such reclaim will be reported in the Table 6H of GSTR 9 of 2025-26 (in GSTR 9 of next Year). This is not to be reported in table 13 of GSTR 9 of FY 2024-25 (Current year) and Table 6A1 of GSTR 9 of FY 2025-26 (in GSTR 9 of next Year).

Example 1 – If any ITC of current FY (2024-25) was claimed and reversed in the FY (2024-25) but reclaimed (Other than rule 37/37A like Circular No. 170/02/2022-GST 6th July 2022 etc) in the next FY (2025-26) till the specified time period (i.e. 30th November 2025) then such ITC will be reported in GSTR 9 as under –

- 1. Original claim shall be reported in Table 6B of GSTR 9 for FY 2024-25
- 2. Reversal of same shall be reported in Table 7H of GSTR 9 for FY 2024-25.
- 3. Shall not report reclaim amount in Table 8C of GSTR 9 for FY 2024-25
- 4. Reclaim shall be reported in table 13 of GSTR 9 for FY 2024-25
- 5. Reclaim shall be reported in table 6A1 in next FY 2025-26 (in GSTR 9 of next Year).

Example 2 – If any ITC of current FY 2024-25 was claimed and reversed in the FY 2024-25 but reclaimed (due to rule 37/37A) in the next FY 2025-26 then such ITC will be reported in GSTR 9 as under –

- 1. Original claim shall be reported in Table 6B of GSTR 9 for FY 2024-25
- 2. Reversal of same shall be reported in Table 7A (rule 37) or 7A1 (rule 37A) of GSTR 9 for FY 2024-25.
- 3. Reclaim shall not to be reported in table 8C and 13 of GSTR 9 for FY 2024-25.
- 4. Reclaim shall be reported in table 6H of GSTR 9 for FY 2025-26 (in GSTR 9 of next Year).

10.	Whether there are any changes in the reporting for table 6M as label has been changed from FY 2024-25	No. Label change to Table 6M has aligned it with the instruction of the notified form. As per the Instruction to the notified formthe ITC claimed through ITC 01, 02 and 02A should be reported in Table 6M of GSTR 9.
11.	What is table 8A excel and where it is available?	To facilitate the taxpayer, the amount auto populated in table 8A online, invoice wise details is being provided in excel sheet on the GSTR 9 dashboard AS 'DOWNLOAD TABLE 8A DOCUMENT DETAILS'. Taxpayer can download and refer the invoices/DN/CN based on which amount is auto populated in the Table 8A online.
12.	Are there any circumstance where 8A Excel and 8A UI (Online) having different details?	Yes. In the following scenarios the Table 8A (Excel) and Table 8A (Online) of GSTR 9 for FY 2024-25 can have different details – 1. Outward supplies covered under RCM will appear in Table 8A excel but not appear in Table 8A online 2. Outward supplies reported as Normal charge and amended to reverse charge then it will appear in Table 8A excel (B2B and B2BA sections of excel sheet) but not appear in Table 8A online 3. Outward supplies (where recipient and supplier belongs to different state) reported as IGST and subsequently PoS is amended as Supplier state and hence CGST and SGST was charged. This record is ineligible for ITC due to PoS Rule, and it will appear in Table 8A excel (B2B as ITC eligibility Yes and B2BA as ITC eligibility No) but not appear in Table 8A online 4. Outward supplies amended from FY 2024-25 to FY 2025-26 then it will appear in Table 8A excel (B2B sections of excel sheet) but not appear in Table 8A online 5. Outward supplies amended from FY 2025-26 to FY 2024-25 then it will appear in Table 8A excel (B2BA sections of excel sheet) and will appear in Table 8A online It may be noted that 8A online is correctly populated whereas there are some additional records may present in Table 8A excel on account of above-mentioned points.

13.

When any amendment made by my supplier in his GSTR 1/1A/IFF, will the changes be auto populated in my Table 8A (Excel and Online) of GSTR 9?

Yes, any amendment in GSTR 1/1A/IFF the auto population in table 8A will be as per amended record if such amended supplies pertain to FY 2024-25.

Example 1 – Invoice dated 30.03.2025 was added in the GSTR 1 for the month of April 2025 (FY 25-26). As this was eligible record for FY 2024-25 hence appear in the table 8A (Excel and Online) of GSTR 9. Now supplier has amended the record in the GSTR 1 for the month of May 2025 and advancing the invoice date as 30.04.2025. After amending the date, now the document belongs to FY 2025-26 and therefore it is not considered for Table 8A (online) of GSTR 9 for FY 2024-25. However, this record will continue to appear in table 8A excel (B2B Section) of GSTR 9 for FY 2024-25.

Vice versa, if any invoice pertains to FY 25-26 but later on Invoice date was preponed to FY 24-25 the record will be auto populated in table 8A excel

(under B2BA section) and Online Table 8A of GSTR 9 for FY 2024-25.

Example 2 – Original Invoice was added in GSTR 1 for January 2025 with Rs 100 (IGST) and subsequently supplier has amended the invoice to Rs 120 (IGST) in Feb2025. After amending the value, Table 8A online will be populated with Rs 120(IGST). However, the Table 8A excel will have this record in B2B sections of excel sheet as Rs 100 (IGST) and B2BA sections of excel sheet as Rs 120 (IGST).

Example 3 – Mr A is registered in Maharashtra has issued invoice with IGST to Mr B (registered in Delhi) in the GSTR 1 for January 2025. As this was eligible record for FY 2024-25 hence it will appear in the table 8A (Excel and Online) of GSTR 9 for FY 2024-25. Now supplier has amended the place of supply as Maharashtra in the GSTR 1 of Feb 2025 and therefore the CGST and SGST is levied on the record. After amending the place of supply, the amended record becomes ineligible ITC record. As the document belongs to FY 2024-25 so it will appear in Table 8A excel (B2B sections of excel sheet as ITC eligibility Yes and B2BA sections of excel sheet as ITC eligibility No). However, this record will not appear in table 8A Online of GSTR 9 for FY 2024-25 as amended record on which ITC is eligible will be considered for the purpose of Table 8A of GSTR 9.

14.

In cases when supplier add the invoices of FY 2024- 25 in In case supplier reported the Invoice/DN/CN for the FY 2024-25 up to the specified time of next FY then such record will be auto populated in the Table 8A of GSTR 9 for FY 2024-25 automatically after filling of GSTR 3B for corresponding tax

GSTR 1 of next tax period by the recipient as ITC to be claimed by the financial recipient in his GSTR 3B. vear till the specified Example – If my supplier reported the Invoices for FY 2024-25 in the GSTR 1 of next FY (between April 2025 to October time period (April 2025 to 2025) i.e. till the specified time period. Then, it is the part of Oct 2025) then GSTR 2B of recipient as eligible ITC. Now, this invoice will be how it will be visible to taxpayer in table 8A of GSTR 9 for FY 2024-25 once the taxpayer files the GSTR 3B for the corresponding tax auto populated in table 8A? period. Table 8C contain data of ITC of current FY which is availed in What is Table next FY within the specified time period. This table shall not **15**. 8C of GSTR 9? include any ITC which was claimed (reported in table 4A of GSTR 3B) and reversed (Reported in 4B of GSTR 3B) in the current FY and reclaimed in next FY till the specified time period. Hence the Table 8C only contain the missed ITC of current FY (2024-25) which is claimed in GSTR 3B of next FY till the specified time period. Whether table No. Incase where the ITC has been claimed and reversed in a FY (2024-25) and reclaimed in 2025-26. Such reclaim ITC 16. 8C will have the should not be reported in the Table 8C of GSTR 9 of FY 2024-ITC which claimed and 25. Example – Mr. A has claimed the ITC in the month of March reversed in a 2025 (Table 4A5 of GSTR 3B) and reversed the same in FY (2024-25)March 2025 (Table 4B2 of GSTR 3B) because the goods has and reclaimed not been reached to its factory. Now in the month of April in next FY 2025 the ITC has been reclaimed ((Table 4A5 of GSTR 3B)). (2025-26)Mr. A will report this ITC in table 6B and Table 7H of GSTR 9 for FY 2024-25. Table 8A will have the corresponding ITC and also the table 8B will be auto populated from Table 6B of GSTR 9 for FY 2024-25. As a result, there is no difference in Table 8D. It means ITC which is reclaimed in next FY should not be reported in table 8C as it will create the mismatch in Table 8D. This reclaim should be reported in Table 13 only. Amount will be reported in table 8C only when: In what cases, 1. The ITC pertaining to the FY 2024-25 which is part of GSTR **17**. ITC shall be 2B and auto populated in Table 8A of GSTR 9 but which has reported in not been claimed by the recipient during the FY 2024-25 and Table 8C of hence he is availing the corresponding ITC first time in table **GSTR 9?** 4A5 of GSTR 3B of next FY (2025-26) till the specified time

period.

2. The supplies pertaining to the FY 2024-25 however supplier has not reported the corresponding invoice in any GSTR 1 filed during FY 2024-25 and reported in GSTR 1 furnished between April'25 to October 2025 and hence recipient is availing the corresponding ITC first time in table 4A5 of GSTR 3B of next FY (2025-26) till the specified time period.

Example 1 – Mr. A has purchased the goods in the month of January 2025 however he has missed to claim the ITC in the January 2025. Now in the month of May 2025 the ITC has been claimed (Table 4A5 of GSTR 3B). This ITC is pertaining to the FY 2024-25, and which has been claimed first time in next year till the specified time period so it will be reported in the Table 8C and Table 13 of GSTR 9.

Example 2 – Mr. A has purchased the goods in the month of January 2025 however supplier has not reported this invoice in GSTR 1 for January 2025. This invoice was added in the GSTR 1 of April 2025 by the supplier which is filed on 11th May 2025. Recipient has claimed the ITC in the GSTR 3B for April 2025 (In table 4A5 of GSTR 3B). This ITC is auto populated in Table 8A of GSTR 9 of FY 2024-25 and which has been claimed first time in next year till the specified time period so it will be reported in the Table 8C and Table 13 of GSTR 9 of FY 2024-25.

Will the Label
Changes for Table
8B and delinking
of table 6H from
Table 8B in the
auto population
create any

difference

Table 8D?

in

From FY 2024-25 Table 8B will auto populate based on amount reported in Table 6B only. Amount reported in the Table 6H will not be part of Table 8B.

ITC which is reclaimed by the recipient will not appearing in GSTR 2B again and hence it will not be auto populated in Table 8A. As, the ITC reclaimed is also not required to be reported in the Table 8C. Therefore, delinking of Table 6H with 8B will mitigate the possibility of causing difference in Table 8D of GSTR 9.

19.

Goods have been imported in FY 24-25 however the ITC has been taken in FY 2025-26 how this will be reported in the GSTR 9

This will be reported in the new inserted row Table 8H1 and it will not be reported in the Table 6E of GSTR 9. IGST Paid on import of goods be reported in Table 8G and Amount of ITC Claimed in next FY to be reported in Table 8H1 and therefore the difference in the Table 8I will be NIL. Also, this ITC will be reported in the Table 13 of GSTR 9 of 24-25.

20.	Which value is auto populated in tax payable in Table 9 of GSTR 9 for FY 2024-25 as negative liability tables has been inserted in the GSTR 3B?	The Tax payable column is captured from GSTR 3B from net liability. If liability reported in the Table 6.1 of GSTR 3B is positive (Gross minus negative liability) then such positive net tax liability be auto populated in the Table 9 under tax payable. However, if net amount in table 6.1 is appearing in negative then no amount will be auto populated under Tax payable column of Table 9. Further tax payable column of Table 9 of GSTR 9 is kept editable and therefore taxpayer may change the value, if required.
21.	Whether label change to Table 12 and table 13 does have any change in the reporting?	Change in the Label of Table 12 and table 13 does not make any difference in the reporting compared to any preceding financial years. Table 12 captures the ITC of the financial year (2024-25) reversed in the next financial year. Table 13 captures the ITC of the financial year (2024-25) availed in the next financial year.
22.	Will there be any additional facility for filing the HSN details in Table 17 of GSTR 9 for FY 2024-25	To facilitate the taxpayer, additional excel sheet named as 'DOWNLOAD TABLE 12 of GSTR 1/1A HSN DETAILS' is provided having the consolidated details of Tabel 12 of GSTR 1 and additional sheet have also been provided in the same excel sheet having the details of HSN in the format of Table 17 of GSTR 9. This will facilitate the taxpayer to use the download file and report the same in Table 17 of GSTR 9 for FY 2024-25.
23.	Whether concessional rate of tax of 65% has been omitted or continued in GSTR 9 for FY 2024-25?	From financial year 2024-25, concessional rate of tax of 65% checkbox is removed from the table 17 and 18 of GSTR-9 online as this concessional rate of tax is not applicable currently. Also, in the offline tool such column has been made disabled.
24.	How the late fees are calculated in GSTR 9C for FY 2024-25.	As clarified vide Circular No. 246/03/2025-GST dated 30th January 2025, the late fee is levied under Section 47(2) of the CGST Act for any delay in furnishing the complete annual return under Section 44. This includes both FORM GSTR-9 and FORM GSTR-9C (if applicable). Accordingly, a new Table – 17 titled "Late Fee Payable and Paid" has been inserted below Part V of GSTR-9C to capture such late fee payable under Section 47(2).

The late fee shall be leviable for the period starting from the due date of furnishing the annual return till the date of filing of GSTR 9 for annual return.

The late fee for GSTR 9C will be calculated from date of filing of GSTR 9 or due date of filing of Annual return, whichever is later till the filling of GSTR-9C.

These late fees will be auto calculated by the system based on the date filing of GSTR 9 and 9C.

Example 1 – If GSTR 9 is furnished on 25th December 2025 (due date 31st December 2025) and GSTR 9C is furnished on 7th January 2026. Then no late fees is levied for GSTR 9 as it is furnished within due date. However late fees for 7 days (delay in furnishing of GSTR 9C) is auto populated in GSTR 9C.

Example 2 – If GSTR 9 is furnished on 5th January 2026 (due date 31st December 2025) and GSTR 9C is furnished on 7th January 2026. Then total late fees leviable is for 7 days which will be auto populated by the system as for 5 days at the time of filing GSTR 9 and for balance 2 days will be populated in GSTR 9C at the time of filing GSTR 9C.

25.

Whether the ITC reclaimed under Rule 37 or Rule 37A is to be treated as ITC of the original invoice year or of the year in which it is reclaimed?

The ITC which is claimed and reversed due to reason of rule 37 / 37A and subsequently reclaimed in any financial year then such reclaimed ITC will be considered the ITC of that year only (in which it has been reclaimed).

Therefore, it will always report in Table 6H of GSTR 9 to be filed for the FY in which such reclaim has been reported.

• ADVISORY FOR INTRODUCTION OF "PENDING" OPTION FOR CREDIT NOTES
AND DECLARATION OF REVERSAL AMOUNT IN IMS, DATED - 17.10.2025

Notification Category: GSTN Advisories

Summary:

The GSTN has issued an Advisory dated 17.10.2025, to introduce a new functionality in the Invoice Management System (IMS) on the GST portal to enhance flexibility and ease of compliance for taxpayers in handling credit notes.

Under this enhancement, taxpayers can now mark credit notes as "Pending" for one tax period, instead of accepting or rejecting them immediately.

Additionally, the IMS has been upgraded to allow taxpayers to modify the Input Tax Credit (ITC) reversal amount upon acceptance of such credit notes.

The GSTN has also announced that a set of detailed FAQs explaining the process and operational aspects of this new functionality will be released shortly to assist taxpayers in effectively using the feature.

• ADVISORY FOR INTRODUCTION OF IMPORT OF GOODS DETAILS
IN IMS, DATED - 20.10.2025

Notification Category: GSTN Advisories

Summary:

The GSTN as issued an Advisory dated 30.10.2025, regarding introduction of Import of Goods details in IMS.

The Invoice Management System (IMS) was introduced on the GST portal from the October 2024 tax period. It enables recipient taxpayers to accept, reject, or keep pending their individual records uploaded by their suppliers through GSTR-1/1A/IFF. To further enhance the taxpayer convenience, a new section for "Import of Goods" has been introduced in IMS wherein the Bill of Entry (BoE) filed by the taxpayer for import of goods including import from SEZ, will be made available in the IMS for taking allowed action on individual BoE. This functionality will be available from Oct-2025 period onwards.

It may be noted that, if no action is taken on an individual BoE, it will be treated as deemed accepted and based on the action taken, the GST Portal will generate the draft GSTR 2B for the recipient on 14th of subsequent month.

Advisory to file pending returns before expiry of three years,
 Dated – 29.10.2025

Notification Category: GSTR-1, Annual returns - GSTR-9/9C, GSTR-3B

Summary:

The GSTN has issued an Advisory dated 29.10.2025, regarding Three-Year Time Limit for Filing of GST Returns. The GSTN has announced that the restriction will be technically implemented on the GST portal starting from the November 2025 tax period. Accordingly, any return whose due date has lapsed three years ago or more and remains unfiled till November 2025 shall be barred from filing on the GST portal.

An advisory dated 29th October 2024 has already been issued by GSTN to alert taxpayers of this upcoming restriction.

The Finance Act, 2023 has introduced an important amendment in the Central Goods and Services Tax Act, 2017, by inserting a three-year time limit for filing returns under key sections of the Act. This amendment came into effect from 1st October 2023 vide Notification No. 28/2023–Central Tax dated 31st July 2023. As per the amended provisions, taxpayers shall not be allowed to furnish returns after the expiry of three years from the due date of furnishing such returns under Section 37, 39, 44, 52 of the CGST Act, 2017, Thus, the restriction applies to all major periodic returns including GSTR-1, GSTR-3B, GSTR-4, GSTR-5, GSTR-6, GSTR-7, GSTR-8, and GSTR-9/9C.



Direct tax



Gross Direct Tax collection for FY 2025-26 (upto 12 October 2025) is Rs 13.92 lakh crore, 2.36% higher than gross collection for corresponding period last year.

The Central Board of Direct Taxes (CBDT) has released the following statistics:For

For the period 1 April 2025 till 12 October 2025	Amount (Rs.)	Remarks
Gross direct tax collection	Rs 13.92 lakh crore	3.39% higher than gross collection for corresponding period last year
Net direct tax collection (after adjustment of refunds)	Rs 11.89 lakh crore	9.18% higher than net collection for corresponding period last year
Refunds issued	Rs 2.03 lakh crore	23.87% lower than refunds issued for corresponding period last year

<u>Income-tax department introduces 'Response viewed' feature on e-filing portal</u>

In a move to boost transparency and efficiency under the faceless assessment and appeal system, the Income-tax Department has launched a new feature on its e-filing portal that allows taxpayers to discover when their submissions have been reviewed by tax authorities.

The new indicator 'Response viewed by Assessing Officer on <Date>' or 'Response viewed by Commissioner of Income-tax (Appeals) on <Date>' confirms the exact date and time an Assessing Officer or Commissioner of Income Tax (Appeals) accesses a taxpayer's reply or document.

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This enhancement resolves a long-standing issue where taxpayers were uncertain if their responses had been acknowledged during faceless proceedings.

The benefits to taxpayers of above feature include visibility into the progress of cases and confirmation that submissions are being reviewed by tax authorities. It would also help in reducing unnecessary follow-ups and improve communication within the digital system.

Income-tax Act, 2025 comes into effect from 1 April 2026 onwards - Tax department issues advisory regarding submission of revised returns for tax deducted / collected at source, which are getting time barred on 31 March 2026

Background

The Income-tax Act, 1961 stands repealed with effect from 1 April 2026 onwards by virtue of section 536 of the Income-tax Act 2025.

As per section 397(3)(f) of Income-tax Act, 2025, a deductor / collector of tax at source can submit a revised return for Tax deducted at source (TDS) / Tax collected at source (TCS) to the tax authorities within 2 years from the end of the tax year in which such TDS / TCS return is required to be submitted under the Income-tax Act, 2025 or the repealed Income-tax Act, 1961. Consequent to the above, revised TDS / TCS returns for following periods shall be accepted by tax authorities only upto 31 March 2026:

FY 2018-19 (Qtr. 4)

FY 2019-20 to 2022-23 (Qtr. 1 to Qtr. 4)

FY 2023-24 (Qtr. 1 to Qtr. 3)

TDS / TCS returns for the above periods are barred by limitation on 31 March 2026 and would not be accepted from 1 April 2026 onwards.

Advisory issued by tax department

Given the above, deductors / collectors of tax at source have been advised to ensure that necessary revised returns for TDS / TCS which are getting time barred on 31 March 2026, are duly submitted before the said date.

Brochures issued by the Income-tax department on (a) Taxpayers guide to claim exemptions / deductions, (b) How to apply for correction in tax deducted at source challans, (c) Declaration of foreign assets & income

The Income-tax department has issued the following brochures:

- 1. The brochure on Taxpayers guide to claim exemptions / deductions.
- 2. The brochure on TDS provisions with respect to Government deductors.
- 3. The brochure on How to apply for correction in TDS challans.
- 4.The brochure on Declaration of foreign assets and income.

Extension of timelines for filing of audit reports and ITRs for AY 2025–26

The Central Board of Direct Taxes (CBDT) has extended the due date for furnishing Income Tax Returns for Assessment Year 2025–26 from 31 October 2025 to 10 December 2025, and the due date for furnishing audit reports from 31 October 2025 to 10 November 2025.



Corporate Law & Regulatory





GOVERNMENT OF INDIA

Relaxation of additional statutory fee & extension of time for filing of financial statements and annual returns till 31 December 2025, under the Companies Act, 2013

The Ministry of Corporate Affairs (MCA) has granted relaxation to companies for filing their financial statements and annual returns for FY 2024-25 under the Companies Act, 2013. Companies can now file their Form AOC-4, AOC-4 CFS, AOC-4 XBRL, AOC-4 NBFC (Ind AS), MGT-7 and MGT-7A till 31 December 2025, without payment of any additional statutory fee.

The relaxation has been granted considering that MCA recently launched new versions of e-forms on the MCA21 V3 portal. These updated forms were introduced to match the latest digital system and compliance requirements under the Companies Act. Since many companies are still getting used to these new forms and may face technical issues, MCA has allowed the one-time extension to encourage smooth and timely filing without any penalty.

<u>Central Board of Indirect Taxes & Customs (CBIC) introduces</u> <u>system-based auto-approval for IFSC code registration to enhance</u> <u>ease of doing business</u>

In another step towards streamlining Customs procedures and enhancing trade facilitation, the CBIC has introduced system-based auto-approval for IFSC code registration to enhance ease of doing business.

As per the new initiative, the system will automatically approve requests for registration of the same incentive bank account and IFSC code for a particular Importer Exporter Code (IEC) at multiple Customs locations, provided the same combination has already been approved at any one location. Thus, manual intervention by the port officer will be eliminated, and the system will directly approve such requests.

- The initiative is aimed at:
- Swift processing of bank account and IFSC code approval requests
- Simplification of registration process at multiple ports
- Ensuring faster and seamless credit of export incentives into exporters' bank accounts
- Enhancing overall trade efficiency

Exporters get export-related benefits in bank account declared by them in Customs Automated System. There is already a facility for online registration of Authorised Dealer (AD) Code by the exporter on ICEGATE. Requests for registration of incentive-linked bank accounts and IFSC codes under an IEC required approval by Customs officers at each port location. This often resulted in duplication of efforts and pendency of requests, particularly when the same bank account and IFSC combination is being registered across multiple customs stations.





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