

Annual Return under GST (GSTR-9)

CA Vaishali Kharde

GST

One nation, one Tax

- Achieved?

Compliances

- Increase/ Decrease?

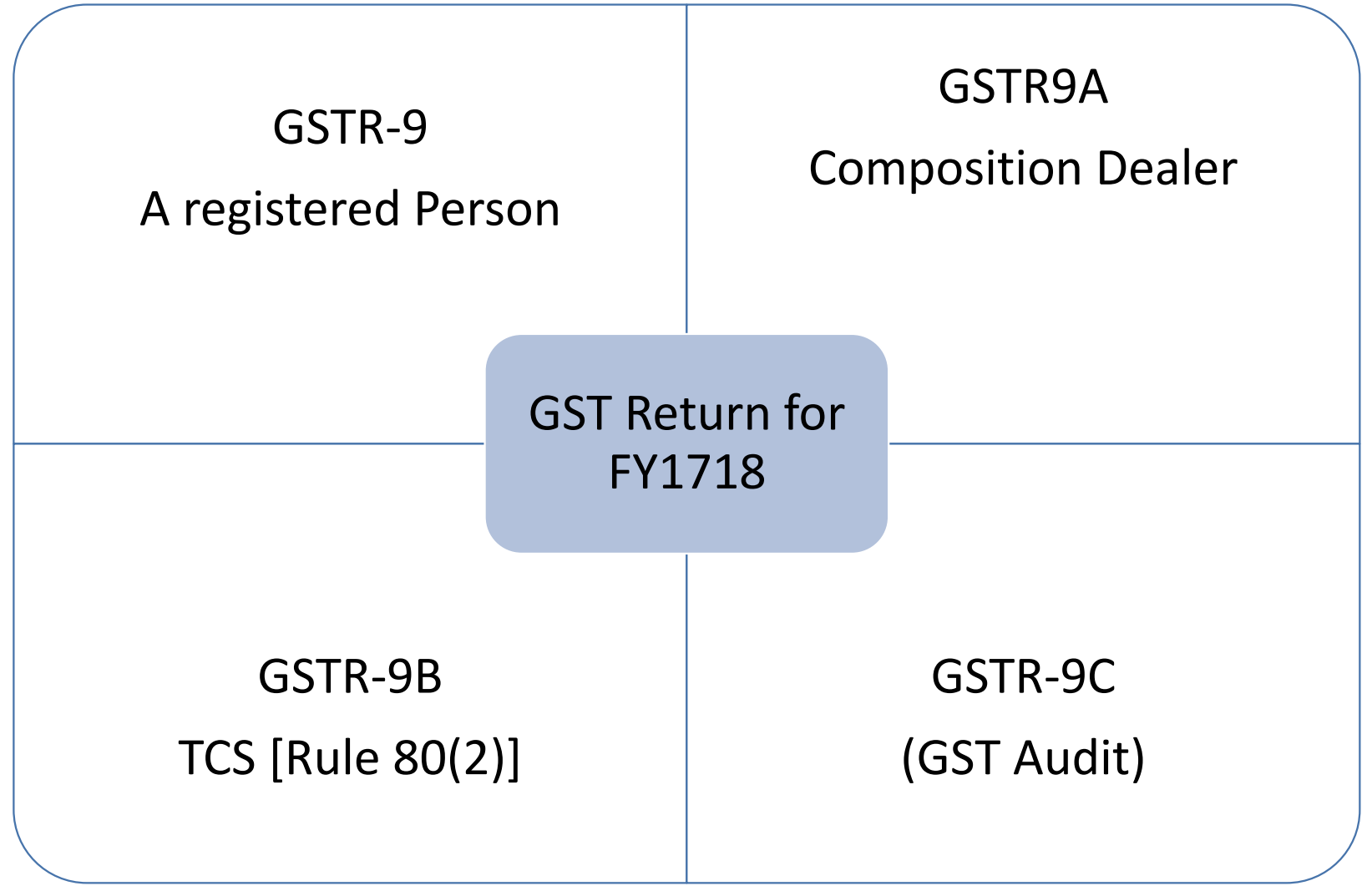
GSTR-9

- 7 Notifications
- 11 Circulars and Flyers

Overview – Annual Return

- **Every registered person**, other than an ISD, a person paying tax under section 51 or section 52, a casual taxable person and a non-resident taxable person, shall furnish an annual return for every financial year electronically in such form and manner as may be prescribed on or before the thirty-first day of December following the end of such financial year [Section 44 (1)]
- GSTR 9 format -Notification No. 39/2018 dated 04.09.2018 amended 4 times.

Overview



Applicability -

Circular No.
124/43/2019-GST,
dated 18-11-2019

GSTR-9

- Optional for FY 2017-18 and 2018-19
- Aggregate turnover does not exceed 2 crore rupees

GSTR-9A

- Optional for FY 2017-18 and 2018-19

GSTR-9

Overview

GST
Return for
FY1718



GST
Returns
for April
18 to
March. 19



Annual Return FY
1718

Overview

Period Covered ?

Due date extended to 31st
January 2020

Late filing fee (Rs. 100/- per
day per Act max (0.25% of
turnover in state per Act)

Notice to Non-filer within
15 days electronically
(Section 46 read with Rule
68)



Format

Before proceed keep in mind

GSTR 3B and GSTR-1 Should be in alignment



Correction before September 2018



ITC pertaining to 17-18 be availed before due date of March 18



PARTS OF ANNUAL RETURN

Part I - Basics

Part II – Outward and Inward supplies details

Part III – ITC availed during FY 1718

Part IV - Details of tax paid during FY 1718

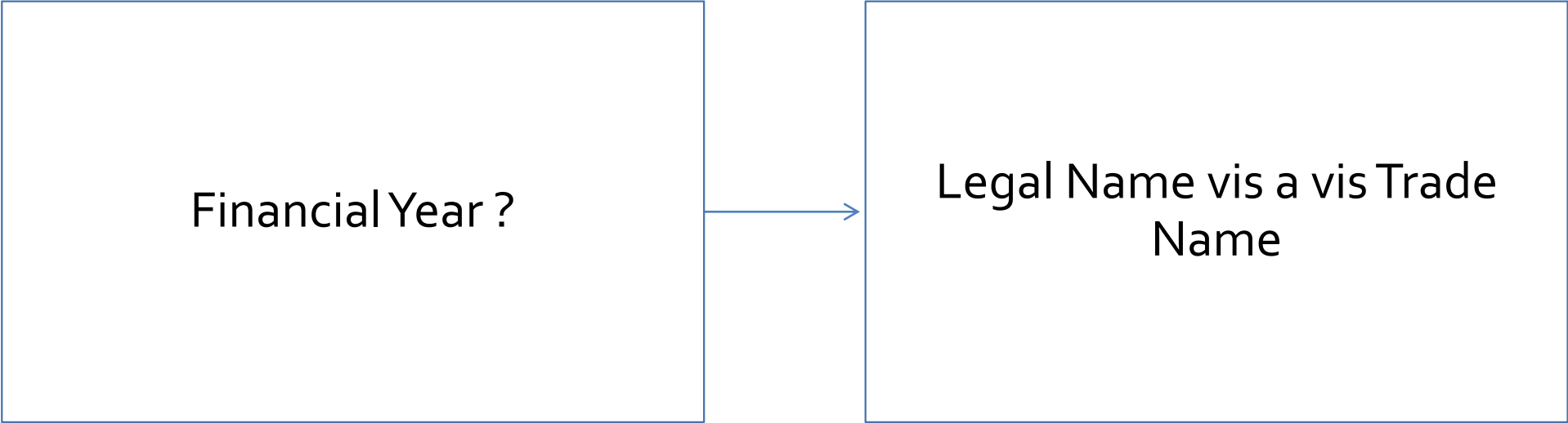
Part V – Transactions of FY 1718 declared in FY 1819 (up to September return)

Part VI – Other information

PART-I of GSTR-9

PARTS – I (Table 1 to Table 3)

"FORM GSTR-9 (See rule 80) Annual Return		
Pt. I	Basic Details	
1	Financial Year	
2	GSTIN	
3A	Legal Name	
3B	Trade Name (if any)	



PART-II of GSTR-9

PARTS –II Details of Outward and inward supplies declared during the financial year

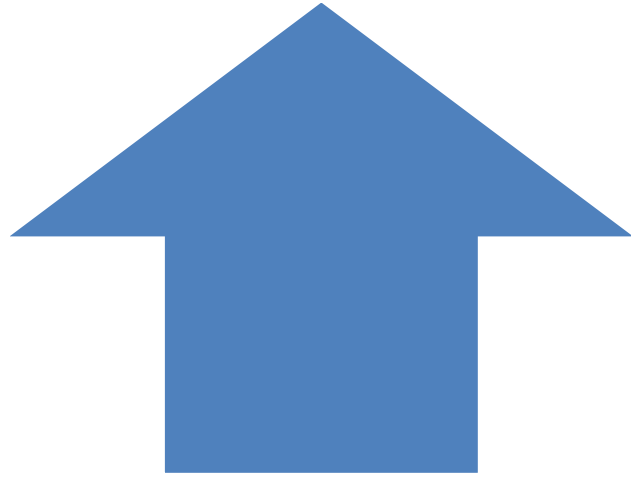


Table 4

Transaction where GST is Payable (Advances, Inward and Outward)



Table 5

Transaction where GST is not payable (ZR, Supply to SEZ, Exempt, RCM, Nil rates, Non-GST)

Table - 4A to 4G (Outward and Inward supply where GST applicable)

Table 4 A to 4G

4A (Table 5, Table 7 and Table 9 and Table 10)	4B (Table 4A and Table 4C)	4C (Table 6A)	4D (Table 6B)	4E (Table 6C)	4F (Table 11A)	4G (Table 3.1(d)) (Table 4B)
Supplies made to un-registered persons (B2C)	Supplies made to registered persons (B2B)	Zero rated supply (Export)	Supply to SEZs on payment of tax	Deemed Exports	Advances on which tax has been paid but invoice has not been issued	Inward supplies on which tax is to be paid on reverse charge basis

Table 4 – Adjustment

Table 4

4I
(Table 9B)

4J
(Table 9B)

4K
(Table 9A and Table 9C)

4L
(Table 9A and Table 9C)

Credit Notes for
(B) to (E) above
(-)

Debit Notes For
(B) to (E) above
(+)

Supplies / tax declared
through Amendments
(+)

Supplies / tax reduced
through Amendments
(-)

Table –5 Outward supplies on which tax is not payable and declared in the financial year

Table 5

5A (Table 6A)	5B Table 6A	5C (Table 4B)	5D (Table 8)	5E (Table 8)	5F (Table 8)
Zero rated supply (Export) without payment of tax	Supply to SEZs without payment of tax	Supplies on which tax is to be paid by the recipient on reverse charge basis	Exempted	Nil Rated	Non-GST supply

Table 5 – Adjustment

Table 5

5I
(Table 9B)

5J
(Table 9B)

5K
(Table 9B)

5L
(Table 9B)

Credit Notes for
(A) to (F) above
(-)

Debit Notes For
(A) to (F) above
(+)

Supplies / tax declared
through Amendments
(+)

Supplies / tax reduced
through Amendments
(-)



PART-III of GSTR-9

PARTS –III Details of ITC for FY



Table 6 – ITC availed

<p>Total amount of ITC (6A) (Auto- populated from 3B)</p>						
<p>6B Table 4(A)(5)</p>	<p>6C Table 4(A)(3) of FORM GSTR-3B</p>	<p>6D Table 4(A)(3)</p>	<p>6E (Table 4(A)(1))</p>	<p>6F (Table 4(A)(2))</p>	<p>6G (Table 4(A)(4))</p>	<p>6H</p>
<p>Inward supplies</p>	<p>Inward supplies of URD liable to RCM (other than B above)</p>	<p>Inward supplies from registered persons liable to RCM (other than B)</p>	<p>Import of goods (including supplies from SEZs)</p>	<p>Import of services (excluding inward supplies from SEZs)</p>	<p>Input Tax credit received from ISD</p>	<p>Amount of ITC reclaimed (other than B above) under the provisions of the Act</p>

Table 6 –ITC availed

Table 6 (ITC Availed)

6K

6L

6M

Transition Credit through TRAN-I
(including revisions if any)

Transition Credit through TRAN-II

Any other ITC availed but not
specified above

Table 7 –ITC Reversed

Table 7 (ITC reversed and Ineligible ITC)

7A Table 4(B)	7B Table 4(B)	7C Table 4(B)	7D Table 4(B)	7E Table 4(B)	7F Table 4(B)	7G Table 4(B)	7H Table 4(B)
Rule 37 (180 days payment)	Rule 39 (ISD become – ve)	Rule 42 Common credit of input and input services	Rule 43 Common credit of Capital Asset	Section 17(5)	Reversal of TRAN-I credit	Reversal of TRAN-II credit	Other reversals (ITC-03)

Table 8 –Table 8 (Other ITC related information) ITC Lapsed Formula

Add/Less	Particulars	Remark
	Total ITC Aailed	Table 6
Less :	Reversal	Table 7
	Net ITC Available for Utilization	Table 7 (J)
Comparison (Table 8)		
	ITC as per GSTR-2A (Auto-Populated)	Table 8(A)
Less	ITC as per sum total of above 6(B) and 6(H)	Table 8(B)
Less	ITC on inward supplies received during 2017-18 but aailed during April to September, 2018	Table 8 (c)
	Difference	Table 8(D)
	ITC available but not aailed (out of D)	Table 8(E)
	ITC available but ineligible (out of D)	Table 8(F)

Table 8 –Table 8 (Other ITC related information) ITC Lapsed Formula

Add/Less	Particulars	Remark
	IGST paid on import of goods (including supplies from SEZ)	Table 8(G)
Less	IGST credit availed on import of goods (as per 6(E) above)	Table 8(H)
	Difference (G-H)	Table 8(I)
	ITC available but not availed on import of goods (Equal to I)	Table 8(J)
	Total ITC to be lapsed in current financial year (E + F + J)	



PART-IV of GSTR-9

Table 8 –II Details of tax paid as declared in returns filed during the FY

Payment of tax under
Table 6.1 of FORM
GSTR-3B

Amount which offset
during GSTR3B (i.e.
How much paid
through cash and
credit.)

No new scope for extra
paid or GST Payable

PART-V of GSTR-9

Part V Transactions of previous FY declared in April to September of current FY

Table 10 (Table 9A, Table 9B and Table 9C)	Supplies / tax declared through Amendments (+) (net of debit notes)
Table 11 (Table 9A, Table 9B and Table 9C)	Supplies / tax reduced through Amendments (-) (net of credit notes)
Table 12 [Table 4(B)]	Reversal of ITC availed during previous financial year
Table 13 [Table 4(A)]	ITC availed for the previous financial year
Table 14	Differential tax paid on account of declaration in 10 & 11 above

PART-VI of GSTR-9

Part VI Other Information

Refund (Claimed,
Sanctioned, Rejected) and
Demand
(Table 15)

Supplies Received from
Composition taxpayer,
Deemed supply (Job Work),
Goods sent on approval
(Table 16)

HSN Wise Summary of
outward supplies
(Table 17)
(5N+10+11]

HSN Wise Summary of
Inward supplies
(Table 18)
(May ask to align in future
table 6 of the GSTR-9)

Late fee payable and paid
(Table 19)

Challenges

- Whether error in outward supply can be corrected?
- Credit availed is more than required to be availed. Whether it can be corrected?
- ITC availed in GSTR-3B is consolidated and not invoice wise. But GSTR-2A is invoice wise
- Scenario where GSTR-2A disclose the credit of vendor other than Company.
- Other scenario
 - $2A > 6B$
 - $2A < 6B$



Summary

Summary –Outward Supply

Sr. No.	Amount Disclosed in 17-18 Return		Amount Disclosed Pertaining to 17- 18 in 18-19		Disclosure in GSTR-9
	GSTR-1	GSTR-3B	GSTR-1	GSTR-3B	
1.	Yes	Yes	NA	NA	
2.	No	Yes	Yes	NA	
3.	Yes	No	NA	Yes	
4.	No	No	Yes	Yes	
5.	No	No	No	NO	

Summary –Inward Supply

- ITC Claimed or reversed between July 2017 to March 2018 in 3B: [Table 6/Table 7](#)
- ITC Claimed between April 2018 to March 2019 in 3B: [Table 13](#)
- ITC Reversed between April 2018 to March 2019: [Table 12](#)
- ITC Reversed in Annual Return: [Table 7 and pay by DRC 03](#)
- ITC cannot be claimed in Annual Return

Other Upcoming Challenges

Upcoming Challenges

Bifurcation of credit in to Inputs, Capital goods and Input services

Separation exempted vs nil rated vs non-GST supply

HSN wise supply for Inward Supply

Goods received free of cost where it should be reported

GSTR-2A autopopulaed

Optional Reporting [Notification 56/2019- Central Tax]

Amendment from 14th November 2019

Table No	Description of table	Changes
Table 4B to Table 4E and Table 5A to Table 5F	Outward Supply	Option to report net of Debit Note, Credit Note and Amendments
Table 5D to Table 5F	Outward supply without Tax	Option to report all nature of supply without tax under Exempted supply
Table and Table 6D 6C	URD RCM and Other RCM	Option to report both details in Table 6D
Table 6B to Table 6E	Bifurcation of ITC	Option to fill details in Inputs only (no need of bifurcation of Input service and Capital Goods)
Table 7A Table 7H (Except Table 7F and 7G)	Details of ITC Reversal and Ineligible ITC	Option to report all details in Table 6H except details of Table 7F (Reversal of Trans 1) and Table 7G (Reversal of Trans 2)
Table 8A to Table 8D	Details of ITC	Option to upload format in GSTR-9C

Amendment from 14th November 2019

Table No	Description of table	Changes
Table 12 and Table 13	Reversal and Availment of ITC of previous FY	Option given to not report
Table 15A to table 15D	Details of refund	Option given to not report
Table 15E to Table 15G	Details of demand	Option given to not report
Table 16A	Supplies from Composite dealer	Option given to not report
Table 16B	Deemed supplies u/s143	Option given to not report
Table 16C	Goods sent on approval basis not approved yet	Option given to not report
Table 17 and Table 18	Outward and Inward HSN	Option given to not report

Notifications

Notification	Remark
Notification No. 39/2018-C.T., dated 4-9-2018]	Prescribed form GSTR 9 and 9C
Notification No. 49/2018-C.T., dated 13-9-2018	Amendment in GSTR-9 and 9C
Notification No. 74/2018-C.T., dated 31-12-2018	Amendment in GSTR-9 and 9C
Notification No. 30/2019-C.T., dated 28-6-2019	Specified OIDAR Services exempt from GSTR-9
Notification No. 31/2019-C.T., dated 28-6-2019	Amendment in GSTR-9 and 9C
Notification No. 56/2019-C.T., dated 14-11-2019]	Amendment in GSTR-9 and 9C

Circular/flyers

Circular /Flyers	Remark
C.B.E. & C. Flyer No. 32, dated 1-1-2018	Returns in GST
C.B.I. & C. Press Release No. 73/2018, dated 7-12-2018	Last date of filing FORM GSTR-9, FORM GSTR-9A and FORM GSTR-9C extended to 31-3-2019
C.B.I. & C. Press Release No. 79/2018, dated 22-12-2018	Recommendations made during 31st meeting of the GST Council
Press Release No. 31/2019, dated 26-8-2019	Due date for furnishing 'Annual Return and Reconciliation Statement' for FY 2017-18 extended
Press Release No. 32/2019, dated 20-9-2019	Recommendations of GST Council in its 37th Meeting held on 20-9-2019
C.B.I. & C. Press Release No. 38/2019, dated 14-11-2019	C.B.I. & C. Press Release No. 38/2019, dated 14-11-2019

Circular/flyers

	Remark
C.B.I. & C. Press Release No. 38/2019, dated 14-11-2019	Returns in FORMS GSTR-9 (Annual Return) & GSTR-9C (Reconciliation Statement) Simplified and Last Date for Submission extended for Financial Year 2017-18 to 31st December 2019 and for Financial Year 2018-19 to 31st March 2020.
C.B.I. & C. Press Release No. 100/2019, dated 4-6-2019	GSTR-9 — Filing of Annual Return — Clarification
C.B.I. & C. Press Release Nos. 105 & 106/2019, dated 3-7-2019	Annual Returns and Reconciliation Statement — Clarification
Circular No. 124/43/2019-GST, dated 18-11-2019	Annual return — Optional filing of Annual return in FORM GSTR-9A under Notification No. 47/2019-C.T. — Clarification

Thank You

E book - <https://taxguru.in/goods-and-service-tax/gst-hand-book-gst-annual-return-audit.html>

CA Vaishali Kharde

Connect at:

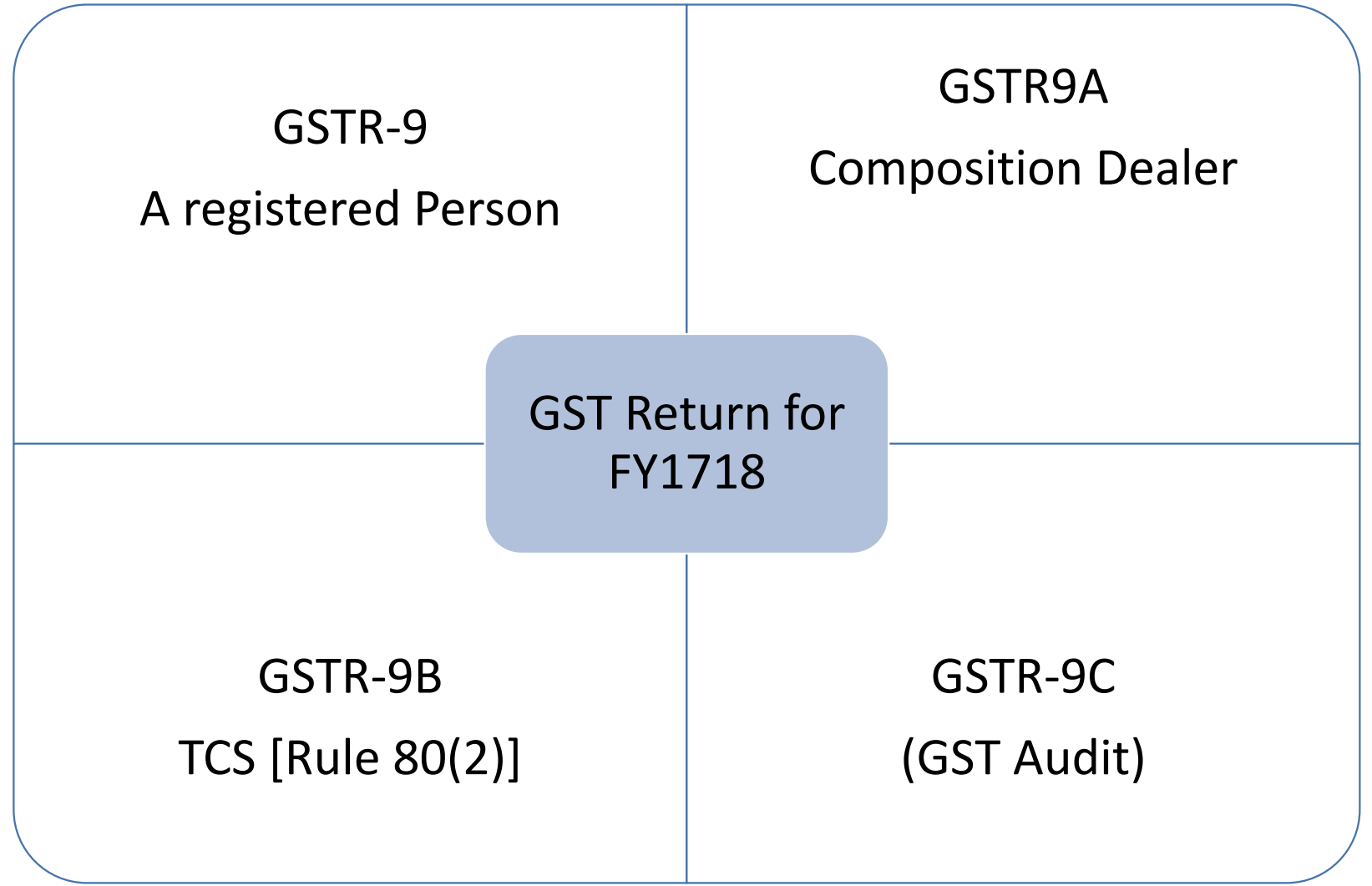
+91 9561005039

Vaishali.kharde@lawgical.in

GST Audit (GSTR-9C)

CA Vaishali Kharde

Overview



Overview

GST
Return for
FY1718



GST
Returns
for April
18 to Sept.
18



Annual Return FY
1718



GSTR-9C

Audit Meaning

As per Section 2(13) of CGST Act, 2017, "audit" means

Examination of records, returns and other documents

Maintained or furnished by the registered person under this Act or the rules made thereunder or under any other law for the time being in force

To verify the correctness of turnover declared, taxes paid, refund claimed and input tax credit availed,

And to assess his compliance with the provisions of this Act or the rules made thereunder;

Types of Audit

GST Audit

Audit by CA or
CMA if
turnover during
FY exceeds Rs.
2 crores

Audit by GST
Authorities

Special Audit
by CA
appointed by
GST
Authorities

Audit by CA or CMA

Section 35(5)

- Every **registered person** whose **turnover** during a financial year exceeds the prescribed limit shall get his accounts audited by a chartered accountant or a cost accountant.....

Rule 80(3)

- Every **registered person** whose **aggregate turnover** during a financial year exceeds **two crore rupees** shall get his accounts audited as specified under sub-section (5) of section 35.....

Aggregate Turnover [section 2(6)]

Aggregate Turnover

“aggregate turnover” means the	aggregate value of all taxable supplies (excluding the value of inward supplies on which tax is payable by a person on reverse charge basis),	exempt supplies, exports of goods or services or both	and inter-State supplies of persons having the same Permanent Account Number,	to be computed on all India basis	but excludes central tax, State tax, Union territory tax, integrated tax and cess
--------------------------------	---	---	---	--	---

GSTR-9C

Period Covered ?

Due date is 31st June 2019

Late filing fee (Rs. 100/- per
day per Act)
Penalty up to 10,000/-

Special Audit by the
Department can be
directed



Format

GST Audit Report

- Form – GSTR-9C
- Notification No. 49/2018 Central Tax dated 13th September 2018 amended by Notification No. 74/2018 – Central Tax dated 31st December 2019

Form GSTR-9C

Part A

Reconciliation Statement
(Part II to V)

Part B

Certification

PARTS OF GST Audit

Basic Details (1 to 4)

Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (Form GSTR-9) (5-8)

Reconciliation of Tax paid (9 to 11)

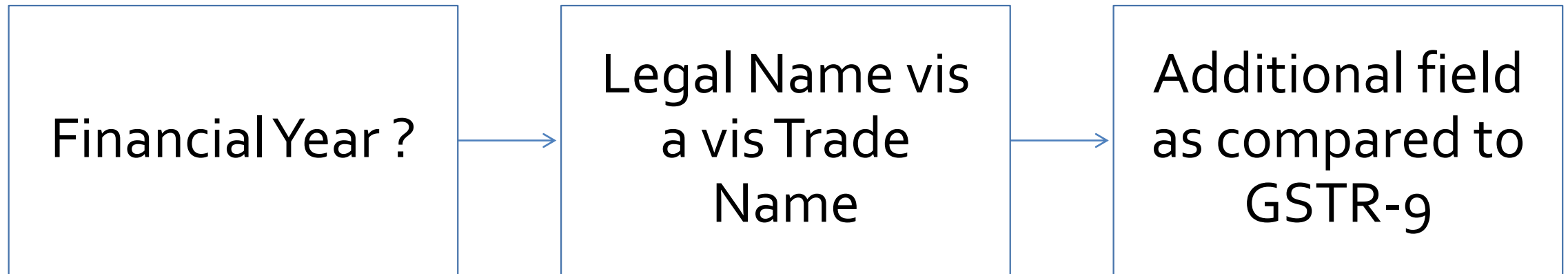
Reconciliation of Input Tax Credit (12 to 16)

Auditor's recommendations on Additional Liability due to non-reconciliation



Part – I

PARTS – I





Part –II (Table 5,6,7,8)

Table 5A – Outward Supply

Turnover of Entity
versus Turnover of
Registered Person

Corroborating the
trial balance relied
upon

Communication
with other auditors
/ Management
representation

Valuations –a
matter of concern

Table 5B and 5H – Unbilled Revenue

Beginning of FY?

Unbilled revenue
viz a viz Time of
Supply

Examine the Notes
to accounts of
Audited Financial
Statement

Table 5C and 5I – Unadjusted Advances

Beginning of FY?

Unadjusted advances viz a viz
taxable turnover

Not. No. 40/2017-CT dt
13.10.2017 (upto 1.5 Cr.) and
later vide NN 66/2017-CT dt
15.11.2017 (all assessee), liability
of GST on advances received for
goods was removed

Table 5E and 5J – Credit Note

Financial Credit note issued against inward supply not to be considered

Not to consider credit notes issued and subsequently cancelled

Credit notes not allowed under GST if invoice was not issued.

Table 5E and 5J – Credit Note

Credit note

Financial - Yes

AR - Yes

Matching-No Reporting

Financial -Yes

AR –No

To be reported as a
reconciliation item in clause
5J

Financials – No

AR –Yes

To be reported as a
reconciliation item in
residuary clause

Financials – No

AR –No

Not to be reported as recon
not affected and no
escapement of tax

Table D : Deemed Supply to be added (Schedule I Supply)

Not recorded in financials but taxable value and taxes given in GST returns

No direct source from financials

- Goods -available from other records like e-way-bill/delivery challans
- Services –Understanding of the business of the client/purpose of expenditure

Suggested to take proper MRL for ensuring the documentation of the procedures followed by management

Audit program to contain specified procedures for identification, valuation and verification of such transactions

Schedule –I Supply

Supply of goods or services or both between related persons distinct persons when made in the course or furtherance of business

Import of services by a taxable person from a related person or from any of his other establishments outside India, in the course or furtherance of business

Gift by employer to employee > Rs. 50000 in a financial year

Permanent transfer/disposal of assets where ITC taken

Supply of goods by principal to agent where agent to supply on behalf of principal and
Supply of goods by agent to principal where agent to receive on behalf of principal

Table 5F- Trade Discount in the FY but not permissible in GST

Conditions of Section 15(3)

- Before or at the time of supply
 - Allowed only if duly recorded in the invoice
- After the supply has been effected
 - Discount to be established as per the agreement at/before time of supply
 - Specifically linked to relevant invoice
 - ITC attributable to discount reversed by the recipient (confirmation letter from customers)

Table K-Supply of goods by SEZ unit to DTA units (-)

Supply of goods by SEZ to DTA and recorded in books of accounts

BOE filed by DTA

BOE filed by SEZ

To be shown as recon item as not shown in returns of SEZ

Not to be shown as recon item as shown in returns of SEZ

Table L- Turnover for the period under composition scheme (-)

Applicable to a registered person who opted out of /becomes ineligible for composition scheme during the year

Summation of turnover and all amendments made from July 2017 to the date of validity of composition scheme to be reported (turnover before July 17 to be ignored)

Advances received during composition scheme to be included for reporting if adjusted against supply during the normal scheme period

Turnover to include exempt supplies/NIL rated supplies /Non GST Supplies etc

Table 5M – Adjustment on account 5M

GST payable on 'transaction value'.

- The value of a supply of goods and/or services shall be the transaction value
- That is the price actually paid or payable for the said supply of goods and/or services
- Where the supplier and the recipient of the supply are not related and
- Price is the sole consideration for the supply

Table 5M – Adjustment on account 5M

TV to include

- **any taxes, duties, cesses, fees and charges levied** under any law for the time being in force other than this Act, the State Goods and Services Tax Act, the Union Territory Goods and Services Tax Act and the Goods and Services Tax (Compensation to States) Act, if charged separately by the supplier
- any amount that the supplier is liable to pay in relation to such supply but which has been incurred by the recipient of the supply and not included in the price actually paid or payable for the goods or services or both;
- **incidental expenses**, including commission and packing, charged by the supplier to the recipient of a supply and any amount charged for anything done by the supplier in respect of the supply of goods or services or both at the time of, or before delivery of goods or supply of services
- **interest or late fee or penalty for delayed payment of any consideration for any supply;**
and
- **subsidies** directly linked to the price excluding subsidies provided by the Central Government and State Governments

Value

Explanation.—For the purposes of this sub-section, the amount of subsidy

shall be included in the value of supply of the supplier who receives the subsidy.

(3) The value of the supply shall not include any discount which is given

(a) before or at the time of the supply if such discount has been duly recorded in the invoice issued in respect of such supply; and

(b) after the supply has been effected, if—

- (i) such discount is established in terms of an agreement entered into at or before the time of such supply and specifically linked to relevant invoices; and
- (ii) input tax credit as is attributable to the discount on the basis of document issued by the supplier has been reversed by the recipient of the supply.

Value

- **Rule27**- Value of supply of goods or services where the consideration is not wholly in money
- **Rule28**-Value of supply of goods or services or both between distinct or related persons, other than through an agent
- **Rule29**-Value of supply of goods made or received through an agent
- **Rule30**-Value of supply of goods or services or both based on cost
- **Rule31**-Residual method for determination of value of supply of goods or services or both

Value

Document to Verify

- Vendor Contracts to understand the expectations from the supplier. Any free supplies by recipient
- Credit Notes—Identify the reasons for issuance of credit notes
- Outward supply invoices issued to customers
- Customer Ledger Statement to identify various debits and credits and reasons for the same
- Contracts for Pure Agency
- List of Related Parties and details of transactions with such related parties

Table 5N – Adjustment on Foreign Exchange

Goods

- The rate of exchange for determination of value of taxable goods shall be the applicable **rate of exchange as notified by the Board** under section 14 of the Customs Act, 1962 for the date of time of supply of such goods in terms of section 12 of the Act.

• Services

- The rate of exchange for determination of value of taxable services shall be the applicable **rate of exchange determined as per the generally accepted accounting principles** for the date of time of supply of such services in terms of section 13 of the Act.

Table 50 - ADJUSTMENTS IN TURNOVER DUE TO REASONS NOT LISTED ABOVE

- It is a residual entry

- Notice pay recovered from employees

- Gifts given to customers/vendors/distributors

- Sale of capital goods

- Inward supply returns considered as Outward supply

- Inputs and Capital Goods sent to job worker but not returned within the prescribed period

ADJUSTMENT
S IN
TURNOVER
DUE TO
REASONS
NOT LISTED
ABOVE

Document to Verify

- Profit and Loss Account,
- Notes forming part of the audited Annual Financial Statements,
- Fixed Asset Schedule,
- Credit entries in expense ledgers,
- Inventory records and Form ITC-04



Table 9

Reconciliation of rate wise liability and amount payable thereon

- The Total values from 7E to be identified against the applicable tax rate for outward supplies;
- Based on the books / records, the values to be taken for reverse charge and corresponding rate of tax under which the tax should have been paid has to be identified;
- Similarly applicable interest, late fee, penalty or other amounts payable should be ascertained based on the books/records;
- The tax and other amounts paid as per GSTR – 9 gets compared with the taxes and other amounts to be paid and difference will be thrown out.
- The reasons for the difference has to be given by the Auditor

Reconciliation of rate wise liability and amount payable thereon

Auditors Responsibility



- Classification of supplies
- Valuation of supplies
- Nature of supply to be identified to ascertain the applicable taxes to be reported
- Identification and Quantification of Interest, late fee and other amounts to be paid

Safeguards to be taken by Auditors



- Documentation as to verification of the above aspects;
- Take management representation covering the above aspects
- Wherever doubt, whether expert view / precedents are referred;
- Difference of view to be reported in reporting part;



Table 11

Additional amount payable but not paid (due to reasons specified under Tables 6,8 and 10)

- The data for this table is to be considered from tables 6, 8 and 10, which has the tax impact;
- Though there is no specific field for giving reasons, the reasons for the difference would have been appropriately given in the respective table 6, 8 & 10.
- This only enables reporting of the liability and does not clear liability in the liability register.
- This liability may be accepted or disputed by the assessee if there is difference in view.
- The accepted liability may be paid in due course by the assessee. The method of payment i.e. either through GSTR -3B or DRC – 03 is not yet clear



PART IV Reconciliation of ITC

ITC Reconciliation

- Reconciliation of ITC of books of account and GST return (Table 12 and 13)

Reconciliation of ITC declared in GST 9 as per profit and loss (Table 14 and Table 15)



PART V (Auditor's Recommendation)

Auditor's recommendation on additional Liability due to non –reconciliation

- Linking of text fields provided in
- Table 6 (Reasons for Un - Reconciled difference in Annual Gross Turnover)
- Table 8 (Reasons for Un - Reconciled difference in taxable turnover) and
- Table 10 (Reasons for un-reconciled payment of amount) with the recommendations provided in Table 17.
- Implication of the recommendations provided without explanations
- Client and auditors having different views, shall be reported in
- Internal control weakness
- Procedural lapses

Optional Reporting [Notification 56/2019- Central Tax]

Amendment from 14th November 2019

Table No	Description of table	Changes
Table 5B to Table 5N	Various reason for adjustment of Turnover	Taxpayer can report all such adjustments in Table 5O
Table 12B	ITC booked in earlier FY booked in current FY (Tans Credit)	Option given not to report
Table 12C	ITC booked in current FY booked to be claimed in subsequent FY	Option given not to report
Table 14	Expense wise ITC bifurcation	Option given not to report



PART V Certification

GST Audit Report – PART B

Certification in cases where the reconciliation statement (Form GSTR-9C) is drawn up by the person who has conducted the audit

Certification in cases where the reconciliation statement (Form GSTR-9C) is drawn up by the person other than the person who has conducted the audit of the accounts

Thank You

E book - <https://taxguru.in/goods-and-service-tax/gst-hand-book-gst-annual-return-audit.html>

CA Vaishali Kharde

Connect at:

+91 9561005039

Vaishali.kharde@lawgical.in