

Clause by Clause Analysis of Annual Return & Audit under GST

Including

Key Management Representations



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Annual Return

- Annual Return is required to be filed by every registered person for every financial year (including the financial year 2017-18) in **FORM GSTR-9/GSTR-9A**, on or before the 31st December following the end of such financial year.

- “Registered Person” means a person who is registered under section 25 but does not include a person having a Unique Identity Number.

- It is required to be filed by every GSTIN whether in Same State / Union Territory or not, irrespective of the turnover.

- Registered Persons excluded for filing of Annual Return -
 - Input Service Distributor,
 - Casual taxable person,
 - Non-resident taxable person,
 - Person paying tax under Tax Deducted at Source - Not applicable; and
 - Person paying tax under Tax Collected at Source - Not applicable.



Annual Return

- Other Registered Persons included for filing of Annual Return (Section 44, Rule 80, Section 52(5)) -
 - Person paying tax under Section 10 (Composition Levy) - in FORM GSTR-9A, and
 - E-Commerce operator required to collect tax at source under Section 52 (Tax Collected at Source) - STATEMENT in FORM GSTR-9B - Not applicable / Irrelevant as Section 52 has been enforced from 1st October, 2018 only.

- Consequences of Not Filing the Annual Return within the Due Date -
 - As per Section 46, notice in FORM GSTR-3A shall be issued requiring to furnish the Annual return within 15 days

 - As per Section 47(2), Late Fee of Rs 100 per day each under CGST and SGST will be payable subject to maximum limit of 0.25% of Turnover in State / Union Territory



Key Issues to be Faced w.r.t Annual Return (GSTR-9)

Important Issues -

- Can additional liability be disclosed, whether or not paid as per DRC-03 or as per Departmental Action, or can ITC be claimed in GSTR-9?
- Can amendment be made, whether or not made as per GSTR-1 or GSTR-3B, through GSTR-9?
- Whether mistakes in GSTR-1 and GSTR-3B can be rectified in GSTR-9?
- Whether data in GSTR-9 be auto-populated or it has to be entered by the taxpayer?
- If data is required to be filled by the taxpayer in the GSTR-9, then whether such data in GSTR-9 will be as per books of accounts or as per GSTR-1 and GSTR-3B filed?



GSTR-9 – Annual Return - Overview

| Part | Details Required | Description |
|------|---|---|
| I | Basic Details | |
| II | Details of Outward and inward supplies declared during the financial year | Part II consists of the details of all outward supplies & advances received during the financial year for which the annual return is filed. The details filled in Part II is a consolidation of all the supplies declared by the taxpayer in the returns filed during the financial year. |
| III | Details of ITC as declared in returns filed during the financial year | Part III consists of the details of all input tax credit availed and reversed in the financial year for which the annual return is filed. |
| IV | Details of tax paid as declared in returns filed during the financial year | Part IV is the actual tax paid during the financial year. |
| V | Particulars of the transactions for the previous FY declared in returns of April to September of current FY or upto date of filing of annual return of previous FY whichever is earlier | Part V consists of particulars of transactions for the previous financial year but declared in the returns of April to September of current FY or date of filing of Annual Return for previous financial year (for example in the annual return for the FY 2017-18, the transactions declared in April to September 2018 for the FY 2017-18 shall be declared), whichever is earlier. |
| VI | Other Information | Part VI consists of details of other information. |





GSTR-9 – Annual Return

Part – II – Table 4 – Details of advances, inward and outward supplies on which tax is payable as declared in returns filed during the financial year

| Pt. II | Details of Outward and inward supplies declared during the financial year | | | | | |
|----------|--|---------------|-----------------------------|--------------------|-----------------|------|
| | | | (Amount in ₹ in all tables) | | | |
| | Nature of Supplies | Taxable Value | Central Tax | State Tax / UT Tax | Integrate d Tax | Cess |
| | 1 | 2 | 3 | 4 | 5 | 6 |
| 4 | Details of advances, inward and outward supplies on which tax is payable as declared in returns filed during the financial year | | | | | |
| A | Supplies made to un-registered persons (B2C) | | | | | |
| B | Supplies made to registered persons (B2B) | | | | | |
| C | Zero rated supply (Export) on payment of tax (except supplies to SEZs) | | | | | |
| D | Supply to SEZs on payment of tax | | | | | |
| E | Deemed Exports | | | | | |
| F | Advances on which tax has been paid but invoice has not been issued (not covered under (A) to (E) above) | | | | | |
| G | Inward supplies on which tax is to be paid on reverse charge basis | | | | | |
| H | Sub-total (A to G above) | | | | | |

Part - II - Table 4 - Details of advances, inward and outward supplies on which tax is payable as declared in returns filed during the financial year

| | | | | | | |
|---|--|--|--|--|--|--|
| H | Sub-total (A to G above) | | | | | |
| I | Credit Notes issued in respect of transactions specified in (B) to (E) above (-) | | | | | |
| J | Debit Notes issued in respect of transactions specified in (B) to (E) above (+) | | | | | |
| K | Supplies / tax declared through Amendments (+) | | | | | |
| L | Supplies / tax reduced through Amendments (-) | | | | | |
| M | Sub-total (I to L above) | | | | | |
| N | Supplies and advances on which tax is to be paid (H + M) above | | | | | |

Entry 4(A) – Supplies made to un–registered persons (B2C)

- ✓ Aggregate value of supplies made to consumers and unregistered persons - B2CL & B2CS, on which tax has been paid (i.e., other than nil rated, exempted, non-GST)

- ✓ Details are to be declared as net of credit notes or debit notes issued & other amendments

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 5 - B2CL Invoices
 - ❖ Table 7 - B2CS Invoices (Net of debit notes and credit notes)
 - ❖ Table 9 - Amendments in B2CL Invoices including debit notes and credit notes
 - ❖ Table 10 - Other Amendments in B2CS Invoices



Entry 4(B) – Supplies made to registered persons (B2B)

- ✓ Aggregate value of supplies made to registered persons (including supplies made to UINs) on which tax has been paid shall be declared here (i.e., other than nil rated, exempted, non-GST)

- ✓ Exclude supplies on which tax is to be paid by the recipient on reverse charge basis - Income from - Sponsorship, GTA, Advocate Fee, etc.

- ✓ Details of debit and credit notes & other amendments are to be mentioned separately

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 4A - B2B Invoices other than those attracting reverse charge



Entry 4(C) – Zero rated supply (Export) on payment of tax (except supplies to SEZs)

- ✓ Aggregate value of exports (except supplies to SEZs) - goods or services or both, on which tax has been paid, i.e., Exports with Payment of IGST

- ✓ Details of debit and credit notes & other amendments are to be mentioned separately

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 6A - Exports



Entry 4(D) – Supply to SEZs on payment of tax

- ✓ Aggregate value of supplies to SEZs - goods or services or both, on which tax has been paid , i.e., Supplies to SEZs with Payment of IGST

- ✓ Details of debit and credit notes & other amendments are to be mentioned separately

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 6B - Supplies made to SEZ unit or SEZ Developer



Entry 4(E) – Deemed Exports

- ✓ Aggregate value of supplies in the nature of deemed exports - goods or services or both, on which tax has been paid

- ✓ Details of debit and credit notes & other amendments are to be mentioned separately

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 6C - Deemed exports



Entry 4(F) – Advances on which tax has been paid but invoice has not been issued (not covered above)

- ✓ Details of all unadjusted advances, i.e., advance has been received and tax has been paid but invoice has not been issued in the current year - FY 2017-18

- ✓ *Include advances for supply of services received from July 2017 upto February, 2018* on which *invoice has not been issued* in the current year *upto March 2018*

- ✓ *Include advances for supply of services received in March 2017*

- ✓ *Include advances for supply of goods received from July 2017 upto 14th November, 2017* on which *invoice has not been issued* in the current year *upto March 2018*

- ✓ *Exclude advances received from July 2017 onwards* for supply of *goods or services or both* on which *invoice has been issued in the current year upto March 2018*



Entry 4(F) – Advances on which tax has been paid but invoice has not been issued (not covered above)

- ✓ *Exclude advances received from 15th November 2017 onwards for supply of goods*

- ✓ *Details shall be after taking effect of amendments made to details furnished earlier*

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 11 - Consolidated Statement of Advances Received/Advance adjusted in the current tax period / Amendments of information furnished in earlier tax period



Entry 4(G) – Inward supplies on which tax is to be paid on reverse charge basis

- ✓ Aggregate value of all inward supplies (including advances and net of credit and debit notes) on which tax is to be paid on reverse charge basis

- ✓ Include -
 - Supplies received from registered persons u/s 9(3) / 5(3)
 - Supplies received unregistered persons u/s 9(3) & 9(4) / 5(3) & 5(4)
 - Aggregate value of all import of services u/s 9(3) / 5(3)

- ✓ Exclude Import of goods

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 3.1(D) - Inward supplies (liable to reverse charge)



Entry 4(I) & 4(J) – Credit / Debit Notes issued in respect of transactions specified in 4(B) to (E) above

- ✓ **Aggregate value of credit / debit notes issued** in respect of -
 - Entry 4(B) - Supplies made to registered persons (B2B)
 - Entry 4(C) - Zero rated supply (Export) on payment of tax (except supplies to SEZs)
 - Entry 4(D) - Supply to SEZs on payment of tax
 - Entry 4(E) - Deemed Exports

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 9B - Debit Notes / Credit Notes issued in respect of Invoices issued for taxable outward supply details furnished in GSTR-1 for earlier tax periods in Table 4A, 4C, 6A, 6B and 6C



Entry 4(K) & 4(L) – Supplies / tax declared / reduced through Amendments in respect of transactions specified in 4(B) to (E) above

✓ Details of Amendments made to -

- Entry 4(B) - Supplies made to registered persons (B2B)
- Entry 4(C) - Zero rated supply (Export) on payment of tax (except supplies to SEZs)
- Entry 4(D) - Supply to SEZs on payment of tax
- Entry 4(E) - Deemed Exports

✓ Forms, Returns & Tables Required to be Referred -

➤ GSTR-1 -

- ❖ Table 9A & Table 9C - Other Amendments to details of Invoices / Shipping Bill / Credit Note / Debit Note in respect of taxable outward supply details furnished in GSTR-1 for earlier tax periods in Table 4A, 4C, 6A, 6B and 6C



Part - II - Table 5 - Details of Outward supplies on which tax is not payable as declared in returns filed during the financial year

| 5 | Details of Outward supplies on which tax is not payable as declared in returns filed during the financial year | | | | | |
|---|--|--|--|--|--|--|
| A | Zero rated supply (Export) without payment of tax | | | | | |
| B | Supply to SEZs without payment of tax | | | | | |
| C | Supplies on which tax is to be paid by the recipient on reverse charge basis | | | | | |
| D | Exempted | | | | | |
| E | Nil Rated | | | | | |
| F | Non-GST supply | | | | | |
| G | Sub-total (A to F above) | | | | | |
| H | Credit Notes issued in respect of transactions specified in A to F above (-) | | | | | |
| I | Debit Notes issued in respect of transactions specified in A to F above (+) | | | | | |
| J | Supplies declared through Amendments (+) | | | | | |
| K | Supplies reduced through Amendments (-) | | | | | |
| L | Sub-Total (H to K above) | | | | | |
| M | Turnover on which tax is not to be paid (G + L above) | | | | | |
| N | Total Turnover (including advances) (4N + 5M - 4G above) | | | | | |

Entry 5(A) – Zero rated supply (Export) without payment of tax

- ✓ Aggregate value of exports (except supplies to SEZs) - goods or services or both, on which tax has not been paid, i.e., Exports without Payment of IGST

- ✓ Details of debit and credit notes & other amendments are to be mentioned separately

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 6A - Exports



Entry 5(B) – Supply to SEZs without payment of tax

- ✓ Aggregate value of supplies to SEZs - goods or services or both, on which tax has not been paid, i.e., Supplies to SEZs without Payment of IGST

- ✓ Details of debit and credit notes & other amendments are to be mentioned separately

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 6B - Supplies made to SEZ unit or SEZ Developer



Entry 5(C) – Supplies on which tax is to be paid by the recipient on reverse charge basis

- ✓ Aggregate value of supplies made to registered persons on which tax is payable by the recipient on reverse charge basis.

- ✓ Details of debit and credit notes & other amendments are to be mentioned separately

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 4B - B2B Invoices attracting tax on reverse charge basis



Entry 5(D), 5(E) & 5(F)– Exempted, Nil Rated & Non–GST supply

- ✓ Aggregate value of exempted, Nil Rated and Non-GST supplies
- ✓ The value of “no supply” shall also be declared here
- ✓ What does “No Supply” mean as it includes Schedule III activities and is thus classifying it under Non-GST Supply
- ✓ Details of debit and credit notes & other amendments are to be mentioned separately
- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 8 - Nil rated, exempted and non GST outward supplies



Entry 5(H) & 5(I) – Credit / Debit Notes issued in respect of transactions specified above

- ✓ Aggregate value of credit / debit notes issued in respect of -
 - Entry 5(A) - Zero rated supply (Export) without payment of tax
 - Entry 5(B) - Supply to SEZs without payment of tax
 - Entry 5(C) - Supplies on which tax is to be paid by the recipient on reverse charge basis
 - Entry 5(D) - Exempted
 - Entry 5(E) - Nil Rated
 - Entry 5(F) - Non-GST supply

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 9B - Debit Notes / Credit Notes issued in respect of Invoices issued for taxable outward supply details furnished in GSTR-1 for earlier tax periods in Table 4A, 4C, 6A, 6B and 6C



Entry 5(J) & 5(K) – Supplies declared / reduced through Amendments

- ✓ Details of amendments made to exports and supplies to SEZs - goods or services or both, on which tax has not been paid, i.e., without Payment of IGST

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 9A & Table 9C - Other Amendments to details of Invoices / Shipping Bill / Credit Note / Debit Note in respect of taxable outward supply details furnished in GSTR-1 for earlier tax periods in Table 4A, 4C, 6A, 6B and 6C



Part - III - Table 6 - Details of ITC as declared in returns filed during the financial year

| Pt. III | Details of ITC as declared in returns filed during the financial year | | | | | |
|----------|---|----------------|-------------|--------------------|----------------|--------|
| | Description | Type | Central Tax | State Tax / UT Tax | Integrated Tax | Cess |
| | 1 | 2 | 3 | 4 | 5 | 6 |
| 6 | Details of ITC as declared in returns filed during the financial year | | | | | |
| A | Total amount of input tax credit availed through FORM GSTR-3B (sum total of Table 4A of FORM GSTR-3B) | | <Auto> | <Auto> | <Auto> | <Auto> |
| B | Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) | Inputs | | | | |
| | | Capital Goods | | | | |
| | | Input Services | | | | |
| C | Inward supplies received from unregistered persons liable to reverse charge (other than B above) on which tax is paid & ITC availed | Inputs | | | | |
| | | Capital Goods | | | | |
| | | Input Services | | | | |
| D | Inward supplies received from registered persons liable to reverse charge (other than B above) on which tax is paid and ITC availed | Inputs | | | | |
| | | Capital Goods | | | | |
| | | Input Services | | | | |
| E | Import of goods (including supplies from SEZs) | Inputs | | | | |
| | | Capital Goods | | | | |
| F | Import of services (excluding inward supplies from SEZs) | | | | | |
| G | Input Tax credit received from ISD | | | | | |
| H | Amount of ITC reclaimed (other than B above) under the provisions of the Act | | | | | |
| I | Sub-total (B to H above) | | | | | |
| J | Difference (I - A above) | | | | | |

Entry 6(A) – Total amount of input tax credit availed through GSTR-3B

✓ Total input tax credit availed in Table 4A of GSTR-3B for the taxpayer would be auto-populated here, including details of ITC availed for -

- Import of goods,
- Import of services,
- Inward supplies liable to reverse charge (other than above),
- Inward supplies from ISD , and/or
- All other ITC,

but before excluding ITC Reversed on account of -

- ITC Reversal as per rules 42 & 43 of CGST Rules, and/or
- Other ITC Reversal



Entry 6(A) – Total amount of input tax credit availed through GSTR-3B

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4 - Eligible ITC - 4(A) ITC Available (whether in full or part)
 - ✓ 4(A)(1) Import of goods
 - ✓ 4(A)(2) Import of services
 - ✓ 4(A)(3) Inward supplies liable to reverse charge (other than 1 & 2 above)
 - ✓ 4(A)(4) Inward supplies from ISD
 - ✓ 4(A)(5) All other ITC



Entry 6(B) – Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)

- ✓ Aggregate value of ITC availed on all inward supplies except those on which tax is payable on reverse charge basis but includes supply of services received from SEZs
- ✓ Total ITC availed is to be classified as ITC on inputs, capital goods and input services
- ✓ This shall not include ITC which was availed, reversed and then reclaimed in the ITC ledger. This is to be declared separately under 6(H) below.
- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4(A)(5) - All other ITC



Entry 6(C) – Inward supplies received from unregistered persons liable to reverse charge (other than B above) on which tax is paid & ITC availed

- ✓ Aggregate value of ITC availed on all inward supplies received from unregistered persons (other than import of services) on which tax is payable on reverse charge basis

- ✓ Total ITC availed is to be classified as ITC on inputs, capital goods and input services

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4(A)(3) - Inward supplies liable to reverse charge (other than 1 & 2 above)



Entry 6(D) – Inward supplies received from registered persons liable to reverse charge (other than B above) on which tax is paid and ITC availed

- ✓ Aggregate value of ITC availed on all inward supplies received from registered persons on which tax is payable on reverse charge basis

- ✓ Total ITC availed is to be classified as ITC on inputs, capital goods and input services

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4(A)(3) - Inward supplies liable to reverse charge (other than 1 & 2 above)



Entry 6(E) – Import of goods (including supplies from SEZs)

- ✓ Details of ITC availed on import of goods including supply of goods received from SEZs
- ✓ Total ITC availed is to be classified as ITC on inputs and capital goods
- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4(A)(1) - Import of Goods



Entry 6(F) – Import of services (excluding inward supplies from SEZs)

- ✓ Details of ITC availed on import of services (excluding inward supplies from SEZs)
- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4(A)(2) - Import of Services



Entry 6(G) – Input Tax credit received from ISD

- ✓ Aggregate value of ITC received from Input Service Distributor

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4(A)(4) - Inward Supplies from ISD



**Part - III - Table 6 - Details of ITC availed as declared in returns
filed during the financial year**

| | | | | | |
|---|---|--|--|--|--|
| I | Sub-total (B to H above) | | | | |
| J | Difference (I - A above) | | | | |
| K | Transition Credit through TRAN-I (including revisions if any) | | | | |
| L | Transition Credit through TRAN-II | | | | |
| M | Any other ITC availed but not specified above | | | | |
| N | Sub-total (K to M above) | | | | |
| O | Total ITC availed (I + N above) | | | | |

Entry 6(K) & 6(L) – Transition Credit through TRAN–I (including revisions if any) & TRAN–II

- ✓ Details of transition credit received in the electronic credit ledger on filing of FORM GST TRAN-I including revision of TRAN-I (whether upwards or downwards)

- ✓ Details of transition credit received in the electronic credit ledger after filing of FORM GST TRAN-II

- ✓ Forms, Returns & Tables Required to be Referred -
 - TRAN-1
 - TRAN-2



Entry 6(M) – Any other ITC availed but not specified above

- ✓ Details of ITC availed but not covered in any of heads specified under 6B to 6L above, i.e., ITC availed under Section 18(1) or ITC transferred in case of sale, merger, demerger, amalgamation, lease or transfer of a business under Section 18(3)

- ✓ Forms, Returns & Tables Required to be Referred -
 - ITC-01
 - ITC-02



Part - III - Table 7 - Details of ITC Reversed and Ineligible ITC as declared in returns filed during the financial year

| 7 | Details of ITC Reversed and Ineligible ITC as declared in returns filed during the financial year | | | | |
|---|---|--|--|-----------|--|
| A | As per Rule 37 | | | | |
| B | As per Rule 39 | | | | |
| C | As per Rule 42 | | | | |
| D | As per Rule 43 | | | | |
| E | As per section 17(5) | | | | |
| F | Reversal of TRAN-I credit | | | | |
| G | Reversal of TRAN-II credit | | | | |
| H | Other reversals (pl. specify) | | | | |
| I | Total ITC Reversed (A to H above) | | | | |
| J | Net ITC Available for Utilization (60 - 7I) | | | 19-Nov-18 | |

Part – III – Table 7 – Details of ITC Reversed and Ineligible ITC as declared in returns filed during the financial year

- ✓ Details of ITC reversed due to -
 - Entry - 7(A) - Reversal as per rule 37 - Reversal of ITC in case of non-payment of consideration
 - Entry - 7(B) - Reversal as per rule 39 - Procedure for distribution of ITC by Input Service Distributor.
 - Entry - 7(C) - Reversal as per rule 42 - Manner of determination of ITC in respect of inputs or input services and reversal thereof
 - Entry - 7(D) - Reversal as per rule 43 - Manner of determination of ITC in respect of capital goods and reversal thereof in certain cases
 - **Entry - 7(E) - Ineligibility as per Section 17(5) - How to make Reversal of Ineligible ITC if such ITC was not availed only in GSTR-3B due to Ineligibility, instead of Availment and Reversal in GSTR-3B**



Part – III – Table 7 – Details of ITC Reversed and Ineligible ITC as declared in returns filed during the financial year

- ✓ Details of ITC reversed due to -
 - Entry - 7(F) - Reversal of TRAN-I Credit
 - Entry - 7(G) - Reversal of TRAN-II Credit
 - Entry - 7(H) - Any Other Reversals - Reversal under Section 18(4) in ITC-03

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4(B) - ITC Reversed
 - ITC-03



Part - III - Table 8 - Other ITC Related Information

| 8 | Other ITC related information | | | | |
|---|---|------------|--------|--------|--------|
| A | ITC as per GSTR-2A (Table 3 & 5 thereof) | <Auto> | <Auto> | <Auto> | <Auto> |
| B | ITC as per sum total of 6(B) and 6(H) above | <Auto > | | | |
| C | ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) received during 2017-18 but availed during April to September, 2018 | | | | |
| D | Difference [A-(B+C)] | | | | |
| E | ITC available but not availed (out of D) | | | | |
| F | ITC available but ineligible (out of D) | | | | |
| G | IGST paid on import of goods (including supplies from SEZ) | | | | |
| H | IGST credit availed on import of goods (as per 6(E) above) | <Auto > | | | |
| I | Difference (G-H) | | | | |
| J | ITC available but not availed on import of goods (Equal to I) | | | | |
| K | Total ITC to be lapsed in current financial year (E + F + J) | <Auto> | <Auto> | <Auto> | <Auto> |

Entry 8(A) – ITC as per GSTR–2A (Table 3 & 5 thereof)

- ✓ Total credit available for inwards supplies (other than imports and inwards supplies liable to reverse charge but includes services received from SEZs) received during 2017-18 and reflected in GSTR-2A (table 3 & 5 only) shall be auto-populated in this table. This would be the aggregate of all the ITC that has been declared by the corresponding suppliers in their GSTR-I.

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-2A -
 - ❖ Table 3 - Inward supplies received from a registered person other than the supplies attracting reverse charge

 - ❖ Table 5 - Debit / Credit notes (including amendments thereof) received during current tax period



Entry 8(B) – ITC as per sum total of 6(B) and 6(H) above

- ✓ The ITC as declared in Table 6B and 6H shall be auto-populated here, i.e., except -
- Inward supplies received from unregistered persons and / or registered persons liable to reverse charge (other than B above) on which tax is paid & ITC availed
 - Import of goods (including supplies from SEZs)
 - Import of services (excluding inward supplies from SEZs)
 - ITC received from ISD
 - Transition Credit through TRAN-I (including revisions if any)
 - Transition Credit through TRAN-II
 - Any other ITC availed - ITC-01 / ITC-02



Entry 8(C) – ITC on inward supplies received during 2017–18 but availed during April to September, 2018

- ✓ Aggregate value of ITC availed on all inward supplies (except those on which tax is payable on reverse charge basis but includes supply of services received from SEZs) received during July 2017 to March 2018 but credit on which was availed between April to September 2018

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4(A)(5) - All other ITC



Entry 8(E) & 8(F) – ITC available but not availed (out of D) & ITC available but ineligible (out of D)

- ✓ Aggregate value of the ITC which was available in GSTR2A (table 3 & 5 only) but not availed in any of the GSTR-3B returns beginning from from July 2017 to September 2018 shall be declared here.

- ✓ The credit shall be classified as -
 - credit which was available and not availed or
 - credit was not availed as the same was ineligible.

The sum total of both the rows should be equal to difference in 8D.



Entry 8(G) & 8(H) – IGST paid on import of goods (including supplies from SEZ) & IGST credit availed on import of goods (as per 6(E) above)

- ✓ Aggregate value of IGST paid at the time of imports (including imports from SEZs) during the financial year
- ✓ ITC as declared in Table 6E shall be auto-populated here



Part - IV - Table 9 - Details of tax paid as declared in returns filed during the financial year

| Pt. IV | Details of tax paid as declared in returns filed during the financial year | | | | | | |
|--------|--|-------------|-------------------|------------------|--------------------|----------------|------|
| 9 | Description | Tax Payable | Paid through cash | Paid through ITC | | | |
| | | | | Central Tax | State Tax / UT Tax | Integrated Tax | Cess |
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 |
| | Integrated Tax | | | | | | |
| | Central Tax | | | | | | |
| | State/UT Tax | | | | | | |
| | Cess | | | | | | |
| | Interest | | | | | | |
| | Late fee | | | | | | |
| | Penalty | | | | | | |
| | Other | | | | | | |

Part – IV – Table 9 – Details of tax paid as declared in returns filed during the financial year

- ✓ Part IV requires the actual tax and other amounts paid during the financial year, by ITC - Electronic Credit Ledger & Cash - Electronic Cash Ledger

- ✓ Other Amounts Include - Interest, Late fee, Penalty & Other - Aggregate Amount for Major Heads of IGST, CGST, SGST / UTGST & Cess to be provided

- ✓ Line-by-line addition to be made of GST Payment done

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 6.1 - Payment of tax



**Part - V - Particulars of the transactions for the FY 2017-18
declared in returns of April 18 to September 18 of FY 2018-19**

| Pt. V | Particulars of the transactions for the previous FY declared in returns of April to September of current FY or upto date of filing of annual return of previous FY whichever is earlier | | | | | |
|-----------|---|---------------|-------------|--------------------|----------------|-----------|
| | Description | Taxable Value | Central Tax | State Tax / UT Tax | Integrated Tax | Cess |
| | 1 | 2 | 3 | 4 | 5 | 6 |
| 10 | Supplies / tax declared through Amendments (+) (net of debit notes) | | | | | |
| 11 | Supplies / tax reduced through Amendments (-) (net of credit notes) | | | | | |
| 12 | Reversal of ITC availed during previous financial year | | | | | |
| 13 | ITC availed for the previous financial year | | | | | |
| 14 | Differential tax paid on account of declaration in 10 & 11 above | | | | | |
| | Description | Payable | | Paid | | |
| | 1 | 2 | 3 | | | |
| | Integrated Tax | | | | | |
| | Central Tax | | | | | |
| | State/UT Tax | | | | | |
| | Cess | | | | | 19-Nov-18 |
| | Interest | | | | | |

Table 10 & 11 – Supplies / tax declared / reduced through Amendments (+) / (–) (net of debit / credit notes)

- ✓ *Details of additions or amendments to any of the supplies already declared in the returns of the previous financial year 2017-18 but such amendments were furnished in Table 9A, Table 9B and Table 9C of FORM GSTR-1 of April 2018 to September 2018 of the current financial year 2018-19*

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-1 -
 - ❖ Table 9 - Amendments to taxable outward supply details furnished in returns for earlier tax periods in Table 4, 5 and 6 [including debit notes, credit notes, refund vouchers issued during current period and amendments thereof]



Table 10 & 11 – Supplies / tax declared / reduced through Amendments (+) / (–) (net of debit / credit notes)

- ✓ Exclusion of following tables for providing details of amendment, resulting in Incorrect / Incomplete Disclosure / Reporting of Amendments, -
 - GSTR-1 -
 - ❖ Table 10 - Amendments to taxable outward supplies to unregistered persons furnished in returns for earlier tax periods in Table 7
 - ❖ Table 11 - Amendments of information furnished in earlier tax period of Advances Received/Advance adjusted



Table 12 – Reversal of ITC availed during previous financial year

- ✓ Aggregate value of reversal of ITC which was availed in the previous financial year but reversed in returns filed for the months of April to September of the current financial year, i.e., -
 - Final Reversal under Rule 42(2)(a)
 - Any Other Reversal

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4(B) - ITC Reversed



Table 13 – ITC availed for the previous financial year

- ✓ Details of ITC for goods or services received in the previous financial year - 2017-18 but ITC for the same was availed in returns filed for the months of April 18 to September 18 of the current financial year - 2018-19, i.e., Details furnished in Entry 8(C) - ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) received during 2017-18 but availed during April to September, 2018

- ✓ Forms, Returns & Tables Required to be Referred -
 - GSTR-3B -
 - ❖ Table 4(A)(5) - All Other ITC



Part - VI - Table 15 - Particulars of Demands and Refunds

| Pt. VI 15 | Other Information | | | | | | | |
|-----------|--|-------------|--------------------|----------------|------|----------|---------|-------------------|
| | Particulars of Demands and Refunds | | | | | | | |
| | Details | Central Tax | State Tax / UT Tax | Integrated Tax | Cess | Interest | Penalty | Late Fee / Others |
| | 1 | 2 | 3 | 4 | 5 | | | |
| A | Total Refund claimed | | | | | | | |
| B | Total Refund sanctioned | | | | | | | |
| C | Total Refund Rejected | | | | | | | |
| D | Total Refund Pending | | | | | | | |
| E | Total demand of taxes | | | | | | | |
| F | Total taxes paid in respect of E above | | | | | | | |
| G | Total demands pending out of E above | | | | | | | |

Part – VI – Table 15 – Particulars of Demands and Refunds

- ✓ Aggregate value of refunds claimed, sanctioned, rejected and pending for processing shall be declared

- ✓ Refund claimed will be the aggregate value of all the refund claims filed in the financial year , i.e., excluding refund claims filed on or after 1st April 2018 and will include refunds which have been sanctioned, rejected or are pending for processing

- ✓ Refund sanctioned means the aggregate value of all refund sanction orders

- ✓ Refund pending will be the aggregate amount in all refund application for which acknowledgement has been received and will exclude provisional refunds received. These will not include details of non-GST refund claims.



Part – VI – Table 15 – Particulars of Demands and Refunds

- ✓ Aggregate value of demands of taxes for which an order confirming the demand has been issued by the adjudicating authority shall be declared in Entry 15(E).
- ✓ Aggregate value of taxes paid out of the total value of confirmed demand as declared in 15E shall be declared in Entry 15(F).
- ✓ Aggregate value of demands pending recovery out of 15E above shall be declared in Entry 15(G).
- ✓ No clarification on disclosure / reporting of payment made vide DRC-03



Part - VI - Table 16, 17, 18 & 19 - Other Information

| 16 | Information on supplies received from composition taxpayers, deemed supply under section 143 and goods sent on approval basis | | | | | | | |
|----------|---|----------------|---------------|---------------|-------------|--------------------|----------------|------|
| | Details | | | Taxable Value | Central Tax | State Tax / UT Tax | Integrated Tax | Cess |
| | 1 | | | 2 | 3 | 4 | 5 | 6 |
| A | Supplies received from Composition taxpayers | | | | | | | |
| B | Deemed supply under Section 143 | | | | | | | |
| C | Goods sent on approval basis but not returned | | | | | | | |
| 17 | HSN Wise Summary of outward supplies | | | | | | | |
| HSN Code | UQC | Total Quantity | Taxable Value | Rate of Tax | Central Tax | State Tax / UT Tax | Integrated Tax | Cess |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| | | | | | | | | |
| 18 | HSN Wise Summary of Inward supplies | | | | | | | |
| HSN Code | UQC | Total Quantity | Taxable Value | Rate of Tax | Central Tax | State Tax / UT Tax | Integrated Tax | Cess |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| | | | | | | | | |
| 19 | Late fee payable and paid | | | | | | | |
| | Description | | | | Payable | | Paid | |
| | 1 | | | | 2 | 3 | | |
| A | Central Tax | | | | | 19-Nov-18 | | |
| B | State Tax | | | | | | | |

Part – VI – Table 16 – Information on supplies received from composition taxpayers, deemed supply under section 143 and goods sent on approval basis

- ✓ Aggregate value of supplies received from composition taxpayers shall be declared in 16A
- ✓ Aggregate value of all deemed supplies from the principal to the job-worker in terms of sub-section (3) and sub-section (4) of Section 143 of the CGST Act shall be declared in 16B
- ✓ Aggregate value of all deemed supplies for goods which were sent on approval basis but were not returned to the principal supplier within 180 days of such supply shall be declared here in 16C



Part – VI – Table 17 & Table 18 – HSN Wise Summary of outward supplies & inward supplies

- ✓ Summary of supplies effected and received against a particular HSN code to be reported
- ✓ Optional for taxpayers having annual turnover upto ₹ 1.50 Cr
- ✓ Mandatory to report HSN code at two digits level for taxpayers having annual turnover in the preceding year above ₹ 1.50 Cr but upto ₹ 5.00 Cr and at four digits' level for taxpayers having annual turnover above ₹ 5.00 Cr.
- ✓ UQC details to be furnished only for supply of goods
- ✓ Quantity is to be reported net of returns
- ✓ Table 12 of FORM GSTR1 may be used for filling up details in Table 17 for HSN Wise Summary of outward supplies
- ✓ HSN Wise Summary of inward supplies - should be made optional due to lack of feasibility





GSTR-9C – Reconciliation Statement - Overview

Part - II - Table 5 & 6 - Reconciliation of Gross Turnover

| Pt. II | Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9) | | |
|--------|--|----------|-----------|
| 5 | Reconciliation of Gross Turnover | | |
| A | Turnover (including exports) as per audited financial statements for the State / UT (For multi-GSTIN units under same PAN the turnover shall be derived from the audited Annual Financial Statement) | | |
| B | Unbilled revenue at the beginning of Financial Year | (+) | |
| C | Unadjusted advances at the end of the Financial Year | (+) | |
| D | Deemed Supply under Schedule I | (+) | |
| E | Credit Notes issued after the end of the financial year but reflected in the annual return | (+) | |
| F | Trade Discounts accounted for in the audited Annual Financial Statement but are not permissible under GST | (+) | |
| G | Turnover from April 2017 to June 2017 | (-) | |
| H | Unbilled revenue at the end of Financial Year | (-) | |
| I | Unadjusted Advances at the beginning of the Financial Year | (-) | |
| J | Credit notes accounted for in the audited Annual Financial Statement but are not permissible under GST | (-) | |
| K | Adjustments on account of supply of goods by SEZ units to DTA Units | (-) | |
| L | Turnover for the period under composition scheme | (-) | |
| M | Adjustments in turnover under section 15 and rules thereunder | (+/-) | |
| N | Adjustments in turnover due to foreign exchange fluctuations | (+/-) | |
| O | Adjustments in turnover due to reasons not listed above | (+/-) | |
| P | Annual turnover after adjustments as above | | <Auto> |
| Q | Turnover as declared in Annual Return (GSTR9) | | |
| R | Un-Reconciled turnover (Q - P) | | AT1 |
| 6 | Reasons for Un - Reconciled difference in Annual Gross Turnover | | |
| A | Reason 1 | <<Text>> | 19-Nov-18 |
| B | Reason 2 | <<Text>> | |
| C | Reason 3 | <<Text>> | |

Part - II - Table 7 & 8 - Reconciliation of Taxable Turnover

| 7 Reconciliation of Taxable Turnover | | |
|--|--|----------|
| A | Annual turnover after adjustments (from 5P above) | <Auto> |
| B | Value of Exempted, Nil Rated, Non-GST supplies, No-Supply turnover | |
| C | Zero rated supplies without payment of tax | |
| D | Supplies on which tax is to be paid by the recipient on reverse charge basis | |
| E | Taxable turnover as per adjustments above (A-B-C-D) | <Auto> |
| F | Taxable turnover as per liability declared in Annual Return (GSTR9) | |
| G | Unreconciled taxable turnover (F-E) | AT 2 |
| 8 Reasons for Un - Reconciled difference in taxable turnover | | |
| A | Reason 1 | <<Text>> |
| B | Reason 2 | <<Text>> |
| C | Reason 3 | <<Text>> |

Part - III - Table 9 & 10 - Reconciliation of rate wise liability and amount payable thereon

| Pt. III Reconciliation of tax paid | | | | | | |
|--|---|---------------|-------------|--------------------|----------------|---------------------|
| 9 Reconciliation of rate wise liability and amount payable thereon | | | | | | |
| 9 | Tax payable | | | | | |
| | Description | Taxable Value | Central tax | State tax / UT tax | Integrated Tax | Cess, if applicable |
| | 1 | 2 | 3 | 4 | 5 | 6 |
| A | 5% | | | | | |
| B | 5% (RC) | | | | | |
| C | 12% | | | | | |
| D | 12% (RC) | | | | | |
| E | 18% | | | | | |
| F | 18% (RC) | | | | | |
| G | 28% | | | | | |
| H | 28% (RC) | | | | | |
| I | 3% | | | | | |
| J | 0.25% | | | | | |
| K | 0.10% | | | | | |
| L | Interest | | | | | |
| M | Late Fee | | | | | |
| N | Penalty | | | | | |
| O | Others | | | | | |
| P | Total amount to be paid as per tables above | | <Auto> | <Auto> | <Auto> | <Auto> |
| Q | Total amount paid as declared in Annual Return (GSTR 9) | | | | | |
| R | Un-reconciled payment of amount | | | | PT 1 | |
| 10 Reasons for un-reconciled payment of amount | | | | | | |
| A | Reason 1 | | <<Text>> | | | |
| B | Reason 2 | | <<Text>> | | | |
| C | Reason 3 | | <<Text>> | | | |

Part - III - Table 11 - Additional amount payable but not paid (due to reasons specified under Tables 6,8 and 10 above)

| | | | | | | |
|----------------------------|--|----------------------|--------------------------------|---------------------------|-----------------------|----------------------------|
| 11 | Additional amount payable but not paid (due to reasons specified under Tables 6,8 and 10 above) | | | | | |
| | | | To be paid through Cash | | | |
| | Description | Taxable Value | Central tax | State tax / UT tax | Integrated tax | Cess, if applicable |
| | 1 | 2 | 3 | 4 | 5 | 6 |
| | 5% | | | | | |
| | 12% | | | | | |
| | 18% | | | | | |
| | 28% | | | | | |
| | 3% | | | | | |
| | 0.25% | | | | | |
| | 0.10% | | | | | |
| | Interest | | | | | |
| | Late Fee | | | | | |
| Penalty | | | | | | |
| Others (please specify) | | | | | | |

Part - IV - Table 12 & 13 - Reconciliation of Net Input Tax Credit (ITC)

| | | | |
|----|--|----------|--------------|
| 12 | Reconciliation of Net Input Tax Credit (ITC) | | |
| A | ITC availed as per audited Annual Financial Statement for the State/ UT (For multi-GSTIN units under same PAN this should be derived from books of accounts) | | |
| B | ITC booked in earlier Financial Years claimed in current Financial Year | (+) | |
| C | ITC booked in current Financial Year to be claimed in subsequent Financial Years | (-) | |
| D | ITC availed as per audited financial statements or books of account | | <Auto> |
| E | ITC claimed in Annual Return (GSTR9) | | |
| F | Un-reconciled ITC | | ITC 1 |
| 13 | Reasons for un-reconciled difference in ITC | | |
| A | Reason 1 | <<Text>> | |
| B | Reason 2 | <<Text>> | |
| C | Reason 3 | <<Text>> | |

Part - IV - Table 14 - Reconciliation of ITC declared in Annual Return (GSTR9) with ITC availed on expenses as per audited Annual Financial Statement or books of account

| 14 | Reconciliation of ITC declared in Annual Return (GSTR9) with ITC availed on expenses as per audited Annual Financial Statement or books of account | | | |
|----|---|-------|---------------------|--------------------------------|
| | Description | Value | Amount of Total ITC | Amount of eligible ITC availed |
| | 1 | 2 | 3 | 4 |
| A | Purchases | | | |
| B | Freight / Carriage | | | |
| C | Power and Fuel | | | |
| D | Imported goods (Including received from SEZs) | | | |
| E | Rent and Insurance | | | |
| F | Goods lost, stolen, destroyed, written off or disposed of by way of gift or free samples | | | |
| G | Royalties | | | |
| H | Employees' Cost (Salaries, wages, Bonus etc.) | | | |
| I | Conveyance charges | | | |
| J | Bank Charges | | | |
| K | Entertainment charges | | | |
| L | Stationery Expenses (including postage etc.) | | | |
| M | Repair and Maintenance | | | |
| N | Other Miscellaneous expenses | | | |
| O | Capital goods | | | |
| P | Any other expense 1 | | | |
| Q | Any other expense 2 | | | |
| R | Total amount of eligible ITC availed | | | << 18 Nov 18 |
| S | ITC claimed in Annual Return (GSTR9) | | | |
| T | Un-reconciled ITC | | | ITC 2 |

Part - IV - Table 14 - Reconciliation of ITC declared in Annual Return (GSTR9) with ITC availed on expenses as per audited Annual Financial Statement or books of account

| 14 | Reconciliation of ITC declared in Annual Return (GSTR9) with ITC availed on expenses as per audited Annual Financial Statement or books of account | | | |
|----|---|-------|---------------------|--------------------------------|
| | Description | Value | Amount of Total ITC | Amount of eligible ITC availed |
| | 1 | 2 | 3 | 4 |
| A | Purchases | | | |
| B | Freight / Carriage | | | |
| C | Power and Fuel | | | |
| D | Imported goods (Including received from SEZs) | | | |
| E | Rent and Insurance | | | |
| F | Goods lost, stolen, destroyed, written off or disposed of by way of gift or free samples | | | |
| G | Royalties | | | |
| H | Employees' Cost (Salaries, wages, Bonus etc.) | | | |
| I | Conveyance charges | | | |
| J | Bank Charges | | | |
| K | Entertainment charges | | | |
| L | Stationery Expenses (including postage etc.) | | | |
| M | Repair and Maintenance | | | |
| N | Other Miscellaneous expenses | | | |
| O | Capital goods | | | |
| P | Any other expense 1 | | | |
| Q | Any other expense 2 | | | |
| R | Total amount of eligible ITC availed | | | << 18 Nov 18 |
| S | ITC claimed in Annual Return (GSTR9) | | | |
| T | Un-reconciled ITC | | | ITC 2 |

Part - IV - Table 15 & 16 - Reasons for un - reconciled difference in ITC & Tax payable on un-reconciled difference in ITC

| | | |
|-----------|---|----------|
| 15 | Reasons for un - reconciled difference in ITC | |
| A | Reason 1 | <<Text>> |
| B | Reason 2 | <<Text>> |
| C | Reason 3 | <<Text>> |
| 16 | Tax payable on un-reconciled difference in ITC (due to reasons specified in 13 and 15 above) | |

| | Description | Amount Payable |
|--|----------------|----------------|
| | Central Tax | |
| | State/UT Tax | |
| | Integrated Tax | |
| | Cess | |
| | Interest | |
| | Penalty | |

Part - V - Auditor's recommendation on additional Liability due to non-reconciliation

| Pt V | Auditor's recommendation on additional Liability due to non-reconciliation | | | | |
|---|--|-------------------------|--------------------|----------------|---------------------|
| | | To be paid through Cash | | | |
| Description | Value | Central tax | State tax / UT tax | Integrated tax | Cess, if applicable |
| 1 | 2 | 3 | 4 | 5 | 6 |
| 5% | | | | | |
| 12% | | | | | |
| 18% | | | | | |
| 28% | | | | | |
| 3% | | | | | |
| 0.25% | | | | | |
| 0.10% | | | | | |
| Input Tax Credit | | | | | |
| Interest | | | | | |
| Late Fee | | | | | |
| Penalty | | | | | |
| Any other amount paid for supplies not included in Annual Return (GSTR 9) | | | | | |
| Erroneous refund to be paid back | | | | | |
| Outstanding demands to be settled | | | | | |
| Other (Pl. specify) | | | | | |

Part - V - Auditor's recommendation on additional Liability due to non-reconciliation

| Pt V | Auditor's recommendation on additional Liability due to non-reconciliation | | | | |
|---|---|-------------------------|--------------------|----------------|---------------------|
| Description | Value | To be paid through Cash | | | |
| 1 | 2 | Central tax | State tax / UT tax | Integrated tax | Cess, if applicable |
| 3 | 4 | 5 | 6 | | |
| 5% | | | | | |
| 12% | | | | | |
| 18% | | | | | |
| 28% | | | | | |
| 3% | | | | | |
| 0.25% | | | | | |
| 0.10% | | | | | |
| Input Tax Credit | | | | | |
| Interest | | | | | |
| Late Fee | | | | | |
| Penalty | | | | | |
| Any other amount paid for supplies not included in Annual Return (GSTR 9) | | | | | |
| Erroneous refund to be paid back | | | | | |
| Outstanding demands to be settled | | | | | |
| Other (Pl. specify) | | | | | |



GSTR-9C – Certification - Overview

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

I. Certification in cases where the reconciliation statement (FORM GSTR-9C) is drawn up by the person who had conducted the audit:

* I/we have examined the—

(a) balance sheet as on

(b) the *profit and loss account/income and expenditure account for the period beginning fromto ending on, and

(c) the cash flow statement for the period beginning fromto ending on, — attached herewith, of M/s (Name), (Address),(GSTIN).

2. Based on our audit I/we report that the said registered person—

*has maintained the books of accounts, records and documents as required by the IGST/CGST/⟨⟨⟩⟩GST Act, 2017 and the rules/notifications made/issued thereunder

*has not maintained the following accounts/records/documents as required by the IGST/CGST/⟨⟨⟩⟩GST Act, 2017 and the rules/notifications made/issued thereunder:

1.

2.

3.

3. (a) *I/we report the following observations/ comments / discrepancies / inconsistencies; if any:

.....
.....

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

3. (b) *I/we further report that, -

(A) *I/we have obtained all the information and explanations which, to the best of *my/our knowledge and belief, were necessary for the purpose of the audit/ information and explanations which, to the best of *my/our knowledge and belief, were necessary for the purpose of the audit were not provided/partially provided to us.

(B) In *my/our opinion, proper books of account *have/have not been kept by the registered person so far as appears from*my/ our examination of the books.

(C) I/we certify that the balance sheet, the *profit and loss/income and expenditure account and the cash flow Statement are *in agreement/not in agreement with the books of account maintained at the Principal place of business atand **additional place of business within the State.

4. The documents required to be furnished under section 35 (5) of the CGST Act and Reconciliation Statement required to be furnished under section 44(2) of the CGST Act is annexed herewith in Form No. GSTR-9C.

5. In *my/our opinion and to the best of *my/our information and according to explanations given to *me/us, the particulars given in the said Form No.GSTR-9C are true and correct subject to following observations/qualifications, if any:

(a)

(b)

(c)

.....

.....

** (Signature and stamp/Seal of the Auditor)

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

*I/we report that the audit of the books of accounts and the financial statements of M/s. (Name and address of the assessee with GSTIN) was conducted by M/s. (full name and address of auditor along with status), bearing membership number in pursuance of the provisions of theAct, and *I/we annex hereto a copy of their audit report dated along with a copy of each of :-

(a) balance sheet as on

(b) the *profit and loss account/income and expenditure account for the period beginning fromto ending on,

(c) the cash flow statement for the period beginning fromto ending on, and

(d) documents declared by the said Act to be part of, or annexed to, the *profit and loss account/income and expenditure account and balance sheet.

2. I/we report that the said registered person—

*has maintained the books of accounts, records and documents as required by the IGST/CGST/⟨⟨⟩⟩GST Act, 2017 and the rules/notifications made/issued thereunder

*has not maintained the following accounts/records/documents as required by the IGST/CGST/⟨⟨⟩⟩GST Act, 2017 and the rules/notifications made/issued thereunder:

1.

2.

3.

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

3. The documents required to be furnished under section 35 (5) of the CGST Act and Reconciliation Statement required to be furnished under section 44(2) of the CGST Act is annexed herewith in Form No.GSTR-9C.

4. In *my/our opinion and to the best of *my/our information and according to examination of books of account including other relevant documents and explanations given to *me/us, the particulars given in the said Form No.9C are true and correct subject to the following observations/qualifications, if any:

- (a)
- (b)
- (c)

.....
**(Signature and stamp/Seal of the Auditor)

Place:

Name of the signatory

Membership No.....

Date:

Full address



Key Management Representation for GST Audit & Annual Return

Key Management Representations

The Auditor should obtain Management Representations on the following key aspects:-

I. Place of Business

a) We do not have other place of business inside the State other than those stated in the Registration Certificate (please ensure that each distinct person is registered separately). We confirm that each of the places of business stated in the said Registration Certificate is duly registered under the GST Laws within the State.

II. Outward Supply

a) We have not affected any supply of goods or services or both from places other than those declared in the certificate of registration and the returns filed from time to time. All kinds (inter-State and intra-State) of supplies / supply returns* including sale of assets, if any, have been duly classified and properly accounted for in the Outward Supply Register or duly recorded in the appropriate books of accounts. They have been properly reflected in the returns filed under the GST laws.



Key Management Representations

- b) The Classification of data in respect of B2B and B2C outward supplies have been correctly classified and accounted in our Returns.
- c) The Deemed supply transactions viz., supplies to Related Parties or supplies between distinct entities / distinct persons * are valued as per Valuation Rules.

III. Inward Supply

a) We have not affected any intra-State, inter-State inward supplies or imports into the State other than those declared in GSTR 9 and GSTR 9C and the returns filed as prescribed. All inward supplies of goods and / or services / inward supply returns including inward supplies of assets, if any, have been duly classified and properly accounted in the relevant register/s. They have been properly reflected in the returns filed from time to time.



Key Management Representations

IV. Transitional Credits

- a) We have claimed transitional credits as per the provisions of the GST laws.
- b) We confirm that the goods cleared to / by / from * Job workers by way of stock transfers, sale on approvals and supplies to agents have been reconciled with the transactions as declared in Books of Accounts. We have reconciled the data of Trans-1 / Trans-2 with the data as declared in Books of Accounts.
- c) We confirm having complied with the provisions of Section 171 of the CGST Act in respect of Anti-profiteering.

V. Documentation

- a) We confirm that we have issued the E-way bill /Delivery note as per the provisions of the GST law.
- b) We confirm that we have obtained the statutory Forms / declarations like LUT, etc from the GST Authority as per the provisions of the GST law.



Key Management Representations

- c) During the year, appeals, if any, are filed against the Demand order / Refund Rejected Order* mainly on the ground of and the matter is pending hearing / adjudication* before the appropriate authority.
- d) The Entries in Electronic Liability Ledger, Electronic Credit ledger and Electronic Cash Ledger for the financial year are reconciled with the transactions in Returns and the Books of Accounts.
- e) We have issued the Self-Invoice and payment vouchers in respect of transactions that are liable to tax on reverse charge in case of inward supplies effected from unregistered suppliers.
- f) We have maintained relevant records in respect of goods sent to / received from job workers and correctly accounted for those transactions. We confirm that all goods sent to job workers have been received back within the timelines prescribed.
- g) We have not raised any tax invoices or supply bills other than the series reported in the supply ledgers. However, in respect of deemed supply, Advances, the Invoice series differ and are duly accounted.
- h) We confirm we have maintained appropriate stock records as required under the GST laws.



Key Management Representations

- i) We have issued only ONE ORIGINAL Tax Invoice / Bill of Supply / Debit Note or credit Note as the case may be, and all other copies are marked as DUPLICATE / TRIPLICATE etc.,
- j) We have prepared the monthly returns based on the books of accounts maintained. The copies of the returns filed with the authorities were submitted / furnished to you for the purpose of your GST audit.
- k) We confirm that the relevant registers relating to Form _____ etc have not been produced to you for your verification and report.

VI. Classification

- a) We have classified the goods/Services supplied by our concern and charged the rate of tax, in accordance with the applicable schedules and/ or notifications/ Advance Rulings etc., under the GST Act 2017.
- b) We confirm that we have correctly classified the activities as supply of goods and / or supply of services as per Second Schedule of GST law.



Key Management Representations

- c) The turnovers of inward and outward supplies relating to classification of goods and / or services based on HSN affected by us and as shown on the invoices, books and records and in the financial statement are correct.
- d) During the year, application for Advance Ruling has been sought and the same is pending before the Authority.

VII. Reconciliation

a) We understand that reconciliation of data provided to you based on the books and records, returns, relevant registers etc., have been matched with financials and relevant returns filed by us from time to time in terms of the GST laws. We reiterate and confirm that in respect of auditors appointed by us to carry out the attest function under the GST Laws in respect of other States / Union Territories have been provided the relevant data from the very same books and records maintained by us. We confirm that the inward and outward supplies including non-GST transactions, deemed supplies (transactions without consideration) and such other transactions have been duly consolidated and matched with the financials.



Key Management Representations

- b) We confirm that we have internally derived the turnover from the Audited financial statement in case of Multi GSTIN units under same PAN and reconciled the total turnover as arrived in 5A of Form GSTR 9C.
- c) We have taken adequate care to reconcile the data with books, records and financial statements in respect of the first quarter of the financial year 2017-18 since; such data relates to the erstwhile indirect tax laws.

VIII. Input Tax Credit

- a) We have paid CGST / SGST and IGST as per GST laws. In case of wrong payment or wrong declaration, we have repaid the correct taxes and claimed refund of the wrong payment of taxes.
- b) We confirm that we have not availed input tax credits in respect of inward supplies affected by us where we have not paid the supplier within a period of 180 days in terms of proviso to Section 16(2) of the CGST Act. In such of those cases where we have availed input tax credits we confirm we have reversed such credits incorrectly availed together with interest.
- c) None of the goods on which we have claimed input credit are subsequently lost or destroyed or disposed of by way of gift, free samples, etc., requiring reversal of input credit and we understand the responsibility of preservation of various documents under the GST Act.



Key Management Representations

- d) We confirm that we have not taken any input tax credit in respect of goods/Services restricted in terms of Section 17(5) of the CGST Act
- e) We confirm that we have availed input tax credits in line with the law laid down in terms of Section 49 of the CGST Act.
- f) In respect of inward supplies of goods and / or services we confirm we have not expensed the taxes and claimed input tax credit of the very same transactions.
- g) During the year, we have not affected any inward supplies from unregistered persons other than those supported by valid self-purchase bills / Payment Vouchers declared in GSTR 9C and the returns filed. Input tax credit for GST paid / payable on Inward supplies affected from such unregistered suppliers (up to 12th October 2017) has been availed in terms of the GST laws.
- h) We have claimed input tax credit on the following basis on fulfilment of the relevant conditions stipulated under the relevant provisions of the GST laws
- i) We confirm that input tax credit availed by us are in respect of use in course or furtherance of business.



Key Management Representations

- j) We are in possession of all the original tax invoices of inward / outward supplies. We confirm having produced such original invoices for your verification during the course of your audit proceedings. We reiterate that we have availed input tax credits based on such original invoices relating to inward supplies.
- k) We have verified the calculations for reversal of credits as applicable under rule 37, 42 and 43 as at the end of the year.

IX. General

- a) The accounting policies adopted by us are set out and elaborated in Notes to Accounts attached to the financial statements.
- b) None of the business premises were a subject matter of inspection by GST Department Officers during the year.
- c) We confirm that we have adhered to the provisions relating to time of supply of goods and time of supply of services in terms of Section 12 and Section 13 of the GST Act, 2017. We confirm we have furnished to you / your firm a policy document in respect of time and place of supply of goods and / or services.



Key Management Representations

d) We confirm and reiterate that while we have our books and records in compliance with the applicable statutes. We are in/not in a position to furnish the State-wise financial Statements for review / audit purposes.

e) In respect of certain transactions on which the valuation Rules stand applicable under the GST laws we confirm that such transactions have been recorded in the books and records appropriately while reiterating that such valuations would not stand to scrutiny under other Statutes.

f) We have noted the observations made in by you / your firm during the course of your audit and we hereby confirm that we shall be solely responsible for the impact, if any, on our tax liability by virtue of such observations.



Key Management Representations

- g) We certify that the following statements, among others, submitted to you to be true and correct:
 - i) Statement of monthly summaries of outward supplies and Inward supplies (with tax analysis);
 - ii) Statement of debit note and credit note as also journal entries (with tax analysis);
 - iii) Statement of goods received inside the State and sent outside the State;
 - iv) Outward Supplies and Inward supplies of fixed assets;
 - v) Details of Other income / Miscellaneous income;
 - vi) Details of expenses on which input tax credit is claimed together with tax analysis thereof;
 - vii) Reconciliation of outward supply and Inward supply with ledger.





Thank You

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