



THE INSTITUTE OF
CHARTERED ACCOUNTANTS OF INDIA
(Set up by an Act of Parliament)

HAPPY 75TH
INDEPENDENCE
DAY

PUNE BRANCH
OF WIRC OF ICAI
Issue No. 8

NEWSLETTER

August 2022

(Subscribers copy not for sale)

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Due Date Calender for the Month August 2022

SR. NO.	DATE	TAXATION UPDATES
1.	7th August, 2022	TDS/TCS Payment July 2022
2.	10th August, 2022	GSTR 7/8 July 2022
3.	11th August, 2022	GSTR 1 July 2022 Monthly
4.	13th August, 2022	IFF July 22 QRMP GSTR 6 July 2022
5.	15th August, 2022	TDS Certificate Q1 22-23 PF/ESIC Payment July 2022
6.	20th August, 2022	GSTR 3B, GSTR 5/5A July 2022 Monthly

Seminar on "MVAT Amnesty Scheme 2022" & "Latest Supreme Court Decisions under GST on Ocean Freight"



**Felicitation of Shri. Dhananjay Akhade Sir
Additional Commissioner of State Tax, Pune zone, Pune**



Participants



**Shri. Dhananjay Akhade Sir
Additional Commissioner of
State Tax, Pune zone, Pune**



**Shri. Santosh Uttarwar Sir
Joint Commissioner of
State Tax, Pune 1**



**Shri. Sadashiv Nande
Assistant Commissioner of
State Tax**



**Shri. Nikhil Sonawane
Assistant Commissioner of
State Tax**



**CA. Deepak Thakkar
Speaker**

VCM on "Analysis of Changes Recommended in 47th GST Council Meeting"



Speakers :- CA. Ravi Kumar Somani & CA. Abhay Desai

Chairman's Communique

Dear Professional Colleagues,

Wishing you all a very Happy 75th Independence Day!!!

This was the day that gave us freedom of thought, action, faith and speech.

As this year is "**Azadi ka Amrit Mahotsav**" we had done various activities under the theme "**AKAM**" and also celebrated the **74th CA Foundation Day** and 60th Year (Diamond Jubilee) of Pune Branch last month by organising various activities for members & students like CSR, Educational, Sports, Cultural etc.



CA. Kashinath Pathare
Chairman
Pune Branch of WIRC of ICAI

In the month of July we had organised Seminar on "MVAT Amnesty Scheme 2022" & "Latest Supreme Court Decisions under GST on Ocean Freight" with the presence of **Shri. Dhananjay Akhade Sir, Additional Commissioner of State Tax, Pune zone, Pune**, Shri. Santosh Uttarwar Sir Joint Commissioner of State Tax, Pune 1, Dr. Rahul R Gorde (Assistant Commissioner of State Tax), Faculty and Coordinator, Shri. Nikhil Sonawane (Assistant Commissioner of State Tax), Shri. Sadashiv Nande (Assistant Commissioner of State Tax), it feels really greatful.

Also we had 60th Annual General Meeting of Pune Branch of WIRC of ICAI on 29th July, 2022 & VCM on "Analysis of Changes Recommended in 47th GST Council Meeting" by renowned speakers CA. Ravi Kumar Somani & CA. Abhay Desai.

After 2 years due to covid pandemic, we are happy to announce this year 7th International Study Tour is going to "**Turkey**" with 43 Members from 12th to 18th August, 2022.

74th CA Foundation Day was celebrated with lot of fanfare for a week. Lets have the glimpses of the activities.

Decoration of Building includes (Lighting, Balloons, Rangoli etc.)



Lighting to Building



Rangoli



Balloons Decoration

Flag Hoisting, Walkathon (Padyatra) & Poster & Slogan Competition

1st July started with **Walkathon (Padyatra)** from **Sarasbaug to ICAI Bhawan, Bibwewadi** participated by 41 members & students. Also 2 posters on the topic "**Saving Planet through Sustainable Development Goals**" contributed by 1 member & 1 student for **Poster & Slogan Competition**.

Flag hoisting ceremony was also done on the occasion of CA Foundation Day with Motto Song of ICAI.



Flag Hoisting



Walkathon (Padyatra)



Poster & Slogan Competition

Health Check Up Camp

Organised Health Check Up Camp & CPR Demonstration - Simple steps to save a life Followed by Free Cardiac, ECG, BP, Diabetes, BMI checkup and Cardiologist & Diabetologist Specialist Consultation by Dr. Naresh Munot & Dr. Rajcee Munot in Association with The Munot Heart Foundation - Munot Heart Care & Research Centre Pune. About 45 members & students has taken the benefit of the same.



Blood Donation Camps

We feel proud that this year we have collected **899 bottles of blood** by organising blood donation camps at 13 locations i.e. ICAI Bhawan, DMKH & Co., SRPA & Associates LLP, SPCM and Associates, KDAK & Co , K Y M & Associates, Interlink Capital Advisors Pvt Ltd., B S & Co. LLP, Khutwad Devkar and Co., Phulfagar Lodha & Co., A A Gugale and Associates, Rathi Rathi and Co., Spay & Co., Hiregange and Associates LLP.

Pune Branch is thankful to all the members who participated in the blood donation camp and acknowledges the contribution of the firms for their active and continued support in this activity.



Cultural Evening & Drama on 'Sequence'

The day ended with Cultural evening, where about 25 performances were held by CA Members & students like Singing, Dancing, Poetry, Mimicry, Shayari etc.

Also one drama was performed namely "Sequence" by our 4 CA Members i.e. CA. Jagdeesh Dhongde, CA. Vishwajeet Honap, CA. Narendra Agarwal & CA. Rohit Ranade.

This cultural evening was enjoyed a lot by 500 Members & Students



Box Cricket Tournament

On 2nd July we had organised Box Cricket Tournament at D7 Ground, Kondhwa, Pune. 20 Teams of members & students participated in the same tournament.

Winner of the tournament was **"BSMART and Associates LLP"**.



Cyclathon, Tree Plantation, & Swachh Bharat Abhiyan

On 3rd July we started the Cyclathon from Pune University, Ganeshkhind, Pune to Taljai Tekdi, Pune with 8 Members & Students.

Then we had 2 CSR activities at Taljai Forest Area, Taljai Mandir Rd, Pune i.e. Tree Plantation & Swachh Bharat Abhiyan with the great presence of Smt. Ashwini Nitin Kadam, Corporator & Former President (Standing Committee), PMC, Pune.



Sports Competitions - Carrom, Chess & Badminton

This year also we got great response for sports competitions. For carrom & chess about 30 members & students were participated and for Badminton about 95 members & students were participated.

Congratulations to all winners.



CSR Activity - Distribution of Education Material to Underprivileged Children

सेवावस्तीमधील 125 विद्यार्थ्यांना शैक्षणिक साहित्य वाटप

Pune Branch of WIRC of ICAI, Pune Branch of WICASA of ICAI यांच्या संयुक्त विद्यमाने CSR Activity म्हणून 'भारतीय स्वातंत्र्याच्या अमृत महोत्सवनिमित्त लोकविकास मंडळ संचलित बालउन्नती प्रकल्पातील गोखले नगर परिसरातील जनवाडी, सोमेश्वर वस्ती, वैदुवाडी, मारुती मंदिर, रामोशी वाडी, डॉ. भाभा अशा 6 सेवावस्तीमधील 125 गरीब आणि होतकरू विद्यार्थ्यांना

सोमवार दिनांक 4 जुलै 2022 रोजी संध्या. 6 वाजता मंजू मित्र हॉल, जनता वसाहत येथे Pune Branch of WIRC Secretary CA Mr.Pritesh Munot, मा.सौ.आरती चंद्रस, मा.सौ.मिनाक्षी शिंदे, मा.श्री.मनोज शिंदे यांच्या शुभहस्ते

लोकविकास मंडळ संस्थेचे प्रकल्प समन्वयक मा.श्री.अरुण निमकर्डे, मा.सौ.विमल कांबळे, मा.कु.तृष्णा गायकवाड, मा.सौ.सुजाता रेड्डी, मा.सौ.श्रीकांता बुरुड, मा.सौ. योगिनी शिंदे, मा.सौ. शिल्पा गायकवाड, मा.सौ.उज्वला डोंगरे, मा.कु.चैत्राली धोत्रे, मा.कु.दिया शिंदे यांच्या प्रमुख उपस्थितीत

2 वही, पेन, पेन्सिल, मोजपट्टी, टोकन यंत्र, खोडरबर व फोल्डर अशा स्वरूपाचे 125 शैक्षणिक कीट वाटप करण्यात आले.

यावेळी Pune Branch of WIRC of ICAI कडून लोकविकास मंडळ संचलित 'बालउन्नती प्रकल्पाला' Token of Gratitude with Best Compliments पुरस्कार देऊन गौरव करण्यात आला



Inauguration of "Accountancy Museum" & Financial & Tax Literacy Drive

On 7th July, 2022 Inaugurated "Accountancy Museum" at Brihan Maharashtra College of Commerce (BMCC), Pune followed by Financial & Tax Literacy Drive on the topic "Finance". This is the 6th college in Pune where we have a "Accountancy Museum" by ICAI.



So by viewing this glimpses you got to know how enthusiastically we celebrated the CA Foundation Day. A big thank you to all members & students who had pat of all these activities.

So please keep in touch to be part of more activities, seminars, conferences, events etc.

In the month of November from 18th to 21st November, 2022 "21st World Congress of Accountants" going to be held at Jio World Centre, Mumbai. Detailed information is available on puneicai.org. Register at earliest if not yet. The biggest international conference in the history of ICAI where the participants will be from foreign countries as well.

"For me, becoming isn't about arriving somewhere or achieving a certain aim. I see it instead as forward motion, a means of evolving, a way to reach continuously toward a better self. The journey doesn't end."

With warm regards,

CA. Kashinath Pathare,
Chairman
Pune Branch of WIRC of ICAI



Appeal to the Members

Pune ICAI seeks your contribution by way of newsletter articles.

Kindly send research based articles on subject matter of your choice by email on editor@puneicai.org

Benefits of Startup Recognition

Contributed by :- CA. Sailee Gujarathi

Email :- sailee@vkg.co.in

Startups – Snapshot of recognition benefits

As we celebrate 75 years of independence, India becomes home to 75,000 recognised startups. Startup may choose to avail recognition with Department of Promotion of Industry and Internal Trade ('DPIIT') as a recognized startup under the Startup India initiative. Below is a snapshot of income-tax, intellectual property and compliance benefits conferred upon recognized startups:

1. INCOME TAX EXEMPTIONS

1.1. Deduction of Taxable Profits

As per section 80-IAC of the Income-tax Act, 1961 ('Act'), eligible startups can be exempted from paying tax on its profits for 3 consecutive financial years out of their first 10 years of incorporation.

1.2. Angel Tax Exemption

If a closely held company issues shares at a premium which is in excess of fair value of the shares, such excess (i.e. Issue Price – Fair Market Value) is taxable in the hands of the issuing company as income from other sources, under section 56(2)(viib) of the Act. The fair market value is determined under Rule 11UA(2) of the Income-tax Rules, 1962, at a formula based on book value or discounted cash flow method. However, it is common phenomenon for angel investors to invest in startups at a high valuation which is based on future potential valuation. In order to provide impetus to such angel investors, the Government has provided an exemption from provisions of section 56(2)(viib), subject to below conditions:

- i) The aggregate amount of paid up share capital and share premium (post issuance) does not exceed INR 25 crores;
- ii) The startup has not invested in specified classes of assets (e.g. land or building, loans and advances, capital contribution to other entity, shares and securities, etc.). The bar on investment in specified assets shall be applicable for a period of 7 years from the end of financial year in which investment is received by the startup.

1.3. Deferred Taxation on Employee Stock Option Plan ('ESOP') for Employees

Ordinarily, in case of receipt of ESOPs, the difference between the fair value of the shares and the exercise price is taxed as a perquisite in the hands of employee at the time of exercise of options. The tax on perquisite is required to be paid at the time of exercising of option which may lead to cash flow problem as this benefit of ESOP is in kind. In order to ease the burden of payment of taxes by the employees of the eligible start-ups or TDS by the start-up employer, the provisions of deduction of tax on ESOP are deferred. The tax on ESOP is required to be deducted at source before 14 days from earlier of below dates:

- (i) after the expiry of 48 months from the end of the relevant assessment year; or
- (ii) from the date of the sale of such sweat equity share by the assessee; or
- (iii) from the date of which the assessee ceases to be the employee of the startup

1.4. Eased restrictions for carry forward and set off losses in case of change of shareholding

As per section 79 of the Act, a closely held company is not allowed to carry forward and set off its losses if 51% or more of its shareholding has changed in the year of set off of losses vis-a-vis the year in which such losses were incurred. However, in case of a startup, even if such condition is not fulfilled, it may carry forward and set off such losses if all the shareholders who held shares carrying voting power on the last day of the year(s) in which the loss was incurred, continue to hold those shares on the last day of such previous year. Also, it is required that such loss has been incurred during the period of seven years beginning from the year in which such company is incorporated.

2. Startup Patent Application & Intellectual Property Rights:

Given its core nature, startups are likely to own intellectual property rights in connection with its innovation. Filing a patent has historically been an expensive and time consuming process which can be out of the reach of many startups.

Recognition of startups would enable fast tracking of patent application, as well as upto 80% rebate in patent filing fee vis-à-vis other companies. This is also coupled with Government funded panel of facilitators who would provide general advisory on different intellectual property.

3. Other Benefits

3.1. Ease of winding up of company

In order to encourage entrepreneurs to experiment with new and innovative ideas and avoid their capital from getting stuck in a company in the event of business failure, startups with simple debt structure can be wound up within 90 days from application. The same will involve appointment of an insolvency professional and liquidator who will be responsible for swift closure of the business, sale of assets and repayment of creditors.

3.2. Access to Government and State Owned Enterprises as potential customers

Government and state owned enterprises purchase goods and services through public procurement route and represents a huge market for startups.

Recognition as an eligible startup provides opportunity of listing product on Government e-marketplace for selling to Government entities directly. Further, the Government shall exempt Startups in the manufacturing sector from the criteria of "prior experience/ turnover" without any compromise on the stated quality standards or technical parameters. Further, DPIIT recognised startups have been exempted from submitting Earnest Money Deposit (EMD) or bid security while filling government tenders.

Parting Keynote:

The relaxations provided to startups under various provisions of the Act merit consideration and can provide a meaningful boost to startups availing the same.

As per extant provisions of section 80-IAC of the Act, an eligible startup is defined to inter alia include entities incorporated before 1st April 2023. Hence, entities which fulfill the conditions for recognition of startups should evaluate the benefits available to them and seek recognition in a due time.



Key points on Clause 44 for Tax Audit under Section 44AB

Contributed by :- CA Vaijayanta Chaugule and CA Vaibhav Chaugule of Kunte & Chaugule
Email :- vaiju.ch@gmail.com

Section 44AB of the Income-tax Act, 1961 ('the Act') read with rule 6G of the Income-tax Rules, 1962 ('the Rules') requires prescribed persons to furnish the Tax Audit Report along with the prescribed particulars in Form No. 3CD. The existing Form No. 3CD was amended vide notification no. GSR 666(E) dated 20th July, 2018 with effect from 20th August, 2018 and proposed clause 44 (pertaining to Goods and Services Tax (GST) compliance) was notified. However, the reporting under clause 44 of the Tax Audit Report was kept in abeyance till 31st March, 2019 vide Circular No. 6/2018 dated 17.08.2018, which was subsequently extended to 31st March, 2020 vide Circular No. 912019. Vide circular no. 10/2020 dated 24.04.2020, it was further extended to 31st March, 2021. Vide circular no. 05/2021, dated 25.03.2021, it was further extended to 31st March, 2022.

A. Following is the extract of Clause 44 for reference:

44. Break-up of total expenditure of entities registered or not registered under the GST:

<i>Sl. No.</i>	<i>Total amount of Expenditure incurred during the year</i>	<i>Expenditure in respect of entities registered under GST</i>			<i>Total payment to registered entities</i>	<i>Expenditure relating to entities not registered under GST</i>
		<i>Relating to goods or services exempt from GST</i>	<i>Relating to entities falling under composition scheme</i>	<i>Relating to other registered entities</i>		
<i>(1)</i>	<i>(2)</i>	<i>(3)</i>	<i>(4)</i>	<i>(5)</i>	<i>(6)</i>	<i>(7)</i>

B. Key Points from Guidance Note of ICAI on Tax Audit:

1. The expression 'payment to registered entities' used in column 6 may be interpreted as 'expenditure'. Accordingly sum total of values reported in columns (3), (4) and (5) should be reported in Column 6. The value of inward supply of goods and/or services received from unregistered persons should be reported in column 7. The total of columns 6 and 7 should match with column 2.
Expenditure relating to other registered entities shall exclude entities included in above exempt supply & composition scheme categories.
2. Total expenditure including purchases as per the format may be given in aggregate. Head-wise / nature wise expenditure details is not required to be reported. (But the working files of Assessee will be needed to be maintained to this detailed level.) Capital expenditure should also be reported. Separate reporting of capital expenditure will provide ease in reconciliation.

3. Depreciation under section 32, deduction for bad debts u/s 36(1)(vii) etc. which are not expenses should not be reported.
4. Expenditure incurred in respect of activities / transactions listed out in Schedule III of CGST Act, 2017 need not be reported. Schedule III is List of activities or transactions which shall be treated neither as a supply of goods nor a supply of Services. Activities that could be Business Expenditure as per The Income Tax Act, 1961 are only highlighted below as only those are relevant for reporting :
1. Services by an employee to the employer in the course of or in relation to his employment.
 2. Services by any court
 3. (a) the functions performed by the Members of Parliament,; (b); or (c)
 4. Services of funeral,
 5. Sale of land and, subject to clause (b) of paragraph 5 of Schedule II, sale of building.**
 6. Actionable claims, other than lottery, betting and gambling.
 7. Supply of goods from a place in the non-taxable territory to another place in the non-taxable territory without such goods entering into India.
 8. (a) Supply of warehoused goods to any person before clearance for home consumption; (b) Supply of goods by the consignee to any other person, by endorsement of documents of title to the goods, after the goods have been dispatched from the port of origin located outside India but before clearance for home consumption.
- ** Schedule II refers to activities [or transactions] 125 to be treated as supply of goods or supply of services. Extract of 5(b) is as follows:*
- 5. Supply of services:*
- The following shall be treated as supply of services, namely:—*
- (a) Renting of immovable property;*
- (b) Construction of a complex, building, civil structure or a part thereof, including a complex or building intended for sale to a buyer, wholly or partly, except where the entire consideration has been received after issuance of completion certificate, where required, by the competent authority or after its first occupation, whichever is earlier.*
5. The reporting requirement can be summarized as Finding Total Expenditure, and bifurcating it into Expenditure in respect of entities **registered** under GST and Expenditure related to entities **not registered** under GST. Further, Expenditure in respect of registered entities needs to be bifurcated into –
- a. Expenditure relating to goods or services **exempt** from GST
 - b. Expenditure relating to entities falling under **composition scheme**
 - c. Expenditure relating to **other** registered entities
- 2) For exempt goods and services, various notifications issued in this regard can be referred to. It may be noted that, supply with nil rate and non-taxable supply (fuel, alcoholic liquor etc.) are also exempt supply.

List of Non Taxable Supply is:

- alcoholic liquor for human consumption
- petroleum crude, high speed diesel oil, motor spirit, natural gas and aviation turbine fuel

Exempt Supply:

To ascertain what are exempt supplies, the following notifications issued under the CGST Act, 2017 and the Integrated Goods and Services Tax Act, 2017 (hereinafter referred to as IGST Act, 2017) are relevant:

- (A) Notification No.1/2017 CT (R), which prescribes rates for intra-State supply of goods
- (B) Notification No.2/2017 CT (R), which prescribes intra-State supply of goods which are exempt
- (C) Notification No.11/2017 CT (R), which prescribes rate for intra-State supply of services
- (D) Notification No.12/2017 CT (R), which prescribes intra-State supply of services which are exempt
- (E) Notification No.1/2017 IT (R), which prescribes rates for inter-State supply of goods (F) Notification No.2/2017 IT (R), which prescribes rates for inter-State supply of goods which are exempt
- (G) Notification No.8/2017 IT (R), which prescribes rates for inter-State supply of services
- (H) Notification No.9/2017 IT (R), which prescribes rates for inter-State supply of services which are exempt

C. Audit procedures that may be adopted:

- a) For purpose of reporting aggregate amount of expenditure in column 2, the following reconciliation statement, based on applicable format of P&L statement, may be prepared and retained as audit working paper as well as for purpose of explanations during assessment. The Tax auditor should verify the details furnished with the underlying document on a test check basis and retain the same as part of his working papers

Particulars	As per P&L	For Clause 44
a Cost of Goods Purchased	XXX	XXX
b Changes in Inventories	XXX	-
c Employee Benefit Expenses	XXX	-
d Finance Cost	XXX	XXX
e Depreciation & Amortisation	XXX	-
f Other Expense	XXX	
<u>Less: Expense out of purview of GST</u>		
<i>Provision for/ actual Bad Debts</i>		(xxx)
<i>Foreign Exchange Loss</i>		(xxx)
<i>Donations / CSR activities</i>		(xxx)
<i>Loss on sale of asset/investment</i>		(xxx)
<i>Provision for Impairment of asset/investment</i>		(xxx)
<i>Other write off or provisions</i>		(xxx)
<i>Opening prepaid expense charged to P&L</i>		(xxx)
<i>Other activities specified in Sch III of CGST Act</i>		<u>(xxx)</u>
g Purchase of Fixed Asset/ CWIP (excluding land & building)	-	XXX
h Amount transferred from current year expenses to prepaid expense	-	XXX
Total	XXX	XXX

Notes:

The above mentioned items are illustrative and not exhaustive.

The employee benefits expense may include items like group insurance expense etc. on which, GST is levied as well as ITC may be available. Such expenses shall be included for the purpose of clause 44 reporting.

For IND-AS compliant entities, items from Other Comprehensive Income need not be included. Further items like adjustments for instruments designated as FVTPL etc. should also be excluded. Special consideration should be given to lease payments as the same are charged to P&L in the form of amortization and finance cost, and therefore actual rent expense might not be considered while reporting.

- b) Once this statement is prepared, the total expenditure for clause 44 now needs to be bifurcated into expenditure relating to registered entities, and expenditure relating to unregistered entities.
- c) For the purpose of reporting expenditure in column 5 "expenditure relating to other registered entities", the Auditor may refer to GSTR-2A where various purchases made by the assessee are reported, which will also match with the amount reported as GST purchase in AIS of assessee. Accordingly the aggregate of expenses reported in GSTR-2A along with those expenses not reported in GSTR-2A but on which GST was levied, as per books of assessee, shall be reported in column 5. It is recommended to maintain details of such additional expenditure not reported in GSTR-2A, for the purpose of explanations during assessment.
- d) Wherever the assessee has maintained information about the exempt supplies from registered entities or purchase from composite dealers, the same may be used for reporting in column 3 and 4.
- e) Details as reported in GSTR returns may be needed to be referred and matched for populating details in Column 5 of the Clause.
- f) Concept of materiality may be applied wherever required.
- g) Information in these columns may have to be filled up consolidating the expenditure incurred under various GST registrations of the Assessee.
- h) Levy of tax under composition scheme is governed by section 10 of the CGST Act, 2017. While reporting the expenditure under this head, the following should be considered:
 - o A composition dealer cannot charge GST in the invoices.
 - o A composition dealer cannot make inter-State supply.
 - o A composition dealer can issue only bill of supply and not a tax invoice.
 - o The composition dealer should have mentioned the following words at the top of the bill of supply issued by them.

D. Probable Remarks/Reference by Tax Auditor:

1. In respect of ITC on supply from entities under composition scheme or ineligible input tax credits which are blocked under section 17(5) of the CGST Act, 2017, many entities may not mention the GSTIN of such entities in the accounting software.
Hence, a suitable remark / reference in this regard by the tax auditor may be included in the report.

"The GST registration details or information of certain suppliers has been not maintained by the assessee where input tax credit for the expenditure is not available/availed. Accordingly, in absence of appropriate information in this regard, the aggregate amount of such expenditure has been included in column 7 "expenditure relating to entities not registered under GST" of clause 44."

2. If the assessee is not in a position to give the details as required in clause 44, an appropriate disclosure/disclaimer may be made by the auditor in Form 3CA/3CB. Where the assessee has provided reason for not being able to provide details, the same may be reported, if found appropriate.

The assessee has not provided us the breakup of total expenditure of entities registered or not under the GST, as necessary information is not maintained by the assessee in its books of accounts. However information to the extent possible and material is reported by us.

3. An appropriate disclosure should be made by the Tax auditor in Form 3CA/3CB, as the case may be, for the view taken by the assessee in relation to the meaning of "Total expenditure" and the method of filling up the appropriate columns.

4. For Assessee who is not registered under GST (Exempt or Nil or Non GST Supplier For e.g. Food grain dealers, etc) but tax audit is applicable under income tax act.

As per information and explanation given by the assessee, the detail required under this clause has not been maintained by the assessee in absence of any disclosure requirements under the GST Act. The assessee is of view, that he is not required to be registered under CGST or SGST Act, hence information is not maintained.

5. General Remarks on methodology and Procedure

- *As per the information and explanations given by the assessee, we have reported the information which is available from the accounting software; however we have relied on the certification given by the assessee as regards the registrations under GST of the Suppliers. GST being a separate enactment, we have relied on the GST returns and related information provided by the assessee.*
- *The accounting software of the assessee is not configured to generate any report in respect of such GST Data in absence of any prevailing statutory requirements regarding the requisite information in this clause. However details as reported in GSTR returns are produced in Column 5 of the Clause and rest of information is provided to the extent possible.*



Pune Branch of WIRC of ICAI

Plot No.8, Parshwanath Nagar, CST No. 333,
Sr.No.573, Munjeri,Opp. Kale hospital,
Near Mahavir Electronics,Bibwewadi, Pune 411037
Tel: (020) 24212251 / 52
Web: www.puneicai.org
Email: admin@puneicai.org

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