

Subodh Vora & Co.

Chartered Accountants



GSTR-9 & 9C

29.01.2022



BACKGROUND

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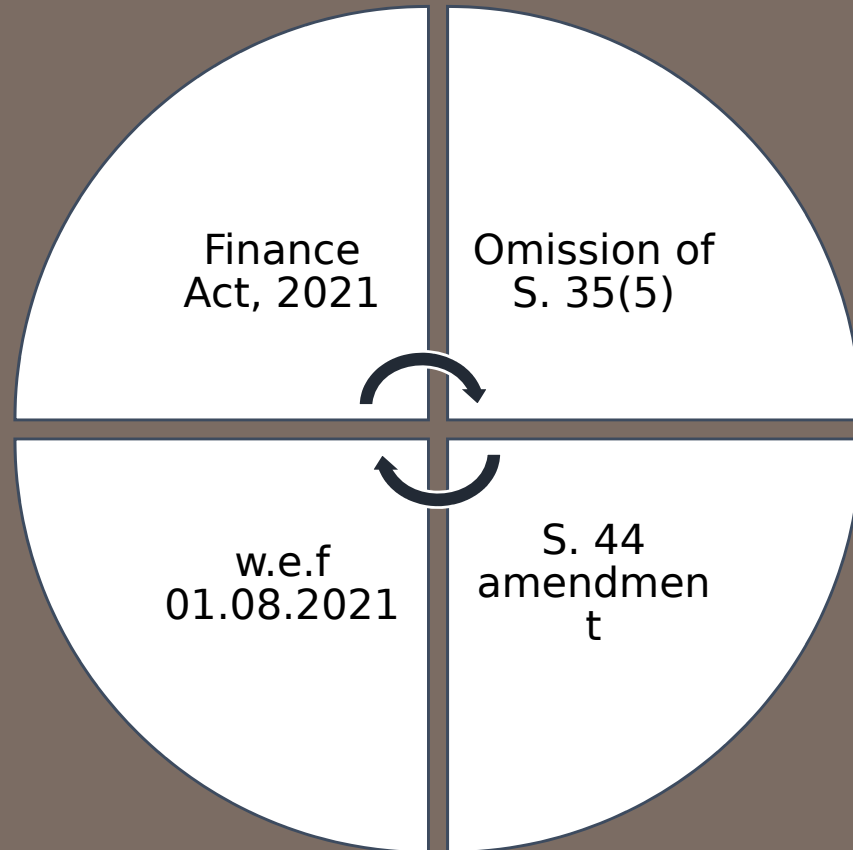
39th GST COUNCIL MEETING dt.14.03.2020

Para 13.5 (Page 48) :

- ❑ *GSTR-9 Revenue - Rs 3,172 crore + Rs 575 Cr. interest*
- ❑ *GSTR-9C Revenue (10%) - Rs 391 crore + Rs 81 Cr. interest*
- ❑ *Compliance Burden vs leakage*
- ❑ *Statistics for tax-payers below 5 Cr
Tax recovery- Approx Rs. 13,000
Compliance Cost- Rs. 50,000*

Removal of GST audit by a Chartered Accountant or Cost Accountant

Amendments
in GST Law





Statutory Provisions

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Section 44 of CGST Act

Every registered person, other than
an Input Service Distributor,
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 which may include a self-certified reconciliation statement,
reconciling the value of supplies declared in the return furnished for the financial year,
with the audited annual financial statement for every financial year electronically, within
such time and in such form and in such manner as may be prescribed:

Rule 80 of CGST Rules

(1) Every registered person, other than those referred to in the second proviso to section 44, an Input Service Distributor, 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 as specified under section 44 electronically in FORM GSTR-9 on or before the thirty-first day of December following the end of such financial year

Provided that a person paying tax under section 10 shall furnish the annual return in **FORM GSTR-9A**.

(2) Every electronic commerce operator required to collect tax at source under section 52 shall furnish annual statement referred to in sub-section (5) of the said section in **FORM GSTR -9B**.

Rule 80(3) of CGST Rules

(3) Every registered person, other than those referred to in the second proviso to section 44, an Input Service Distributor, a person paying tax under section 51 or section 52, a casual taxable person and a non-resident taxable person,

whose aggregate turnover during a financial year exceeds five crore rupees,

shall also furnish a self-certified reconciliation statement as specified under section 44 in **FORM GSTR-9C** along with the annual return referred in sub-rule (1), on or before the thirty-first day of December following the end of such financial year,

Aggregate Turnover

2.(6) “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

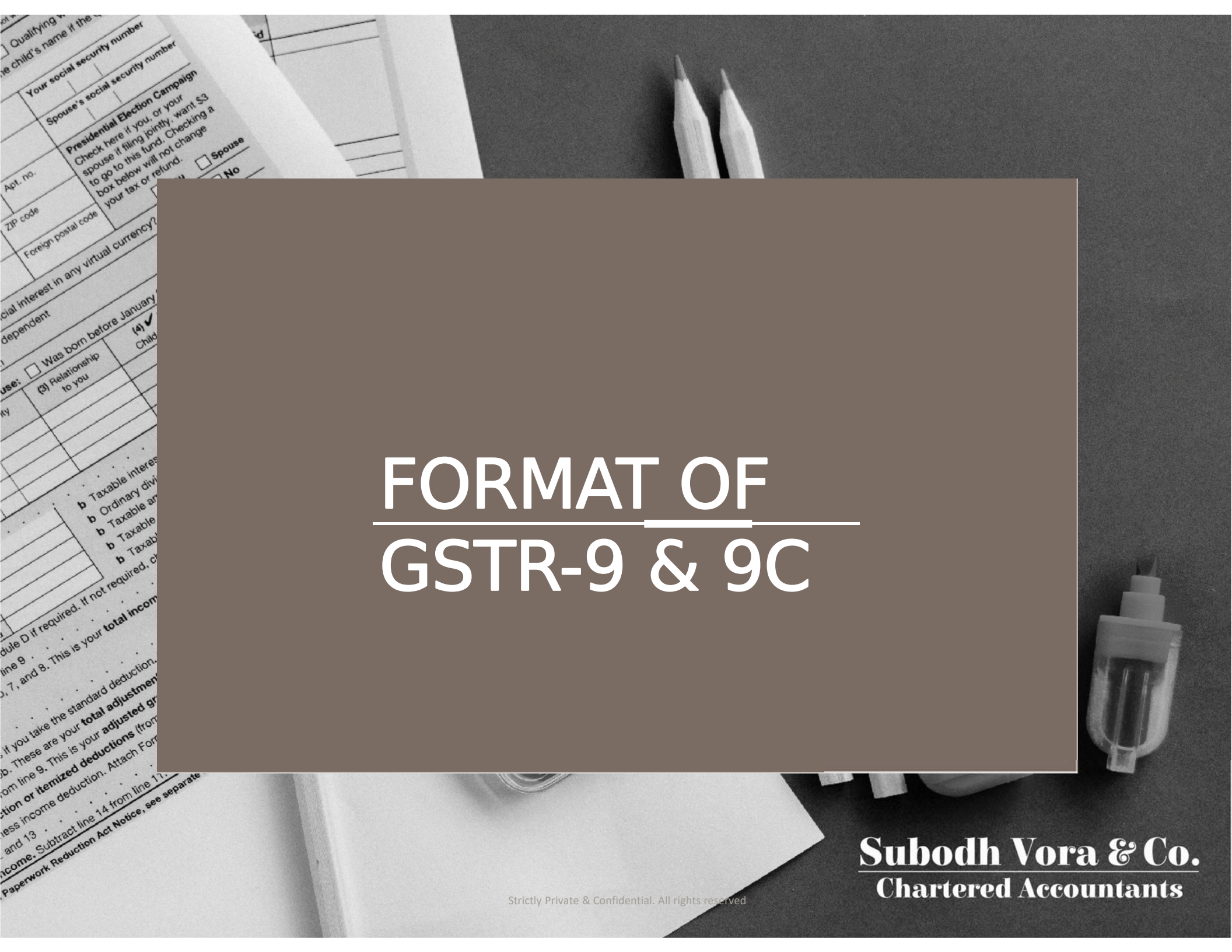
having the same Permanent Account Number, to be computed on all India basis but excludes

central tax, State tax, Union territory tax, integrated tax and cess

Due Dates & Penlaty

Form No	Category of person	Due Date	Late Fees
GSTR -9	Normal tax-payer having ATO> 2 Crore	28.02.2021	Rs. 100 per day subject to maximum of 0.25% of TO
GSTR-9C	Normal tax-payer having T/O> 5 Crore	28.02.2021	General Penalty- Rs. 25,000
GSTR-9A	Composition Dealers	28.02.2021	Rs. 100 per day subject to maximum of 0.25% of TO
GSTR-9B	E-Commerce operators	N.A.	

- ❑ *Covid-19 outbreak, IT deadlines- Further extension of due dates-?*



FORMAT OF GST-9 & 9C

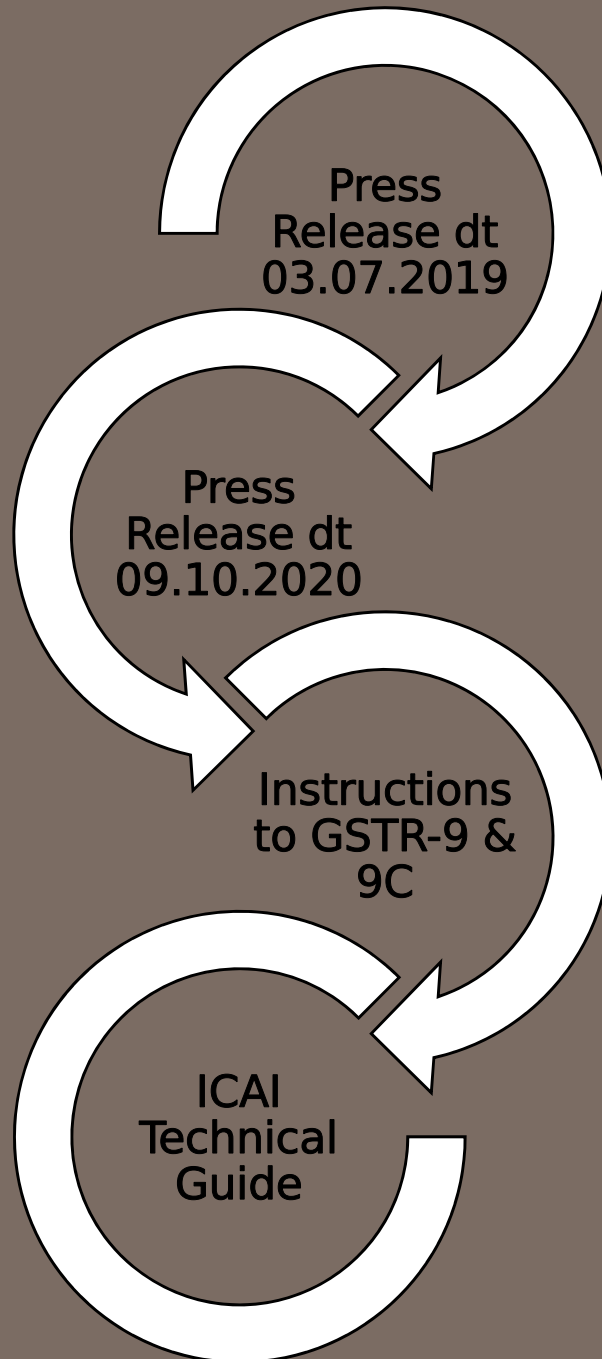
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Format of GSTR - 9

Part	Table	Narration
PART I	Table No 1, 2 and 3	Basic details
PART II	Table No 4	Details of Output Liability (including RCM)
	Table No 5	Details of Exports/ Exempted sales
PART III	Table No 6	Details of ITC availed
	Table No 7	Details of ITC Reversed and Ineligible ITC
	Table No 8	Other ITC information
PART IV	Table No 9	Tax payable and tax paid details
PART V	Table No 10 & 11	Outward liability adjustments
	Table No 12 & 13	ITC Adjustments
	Table No 14	Details of differential tax paid
Part VI	Table No 15	Details of Demand and Refunds
	Table NO 16	Purchase from Composition tax payers, deemed exports, job work
	Table No 17 & 18	HSN wise summary of outward supplies & inward supplies
	Table No 19	Late fees payable & paid

Format of GSTR – 9C

Part	Table	Narration
PART I	Table No 1,2 and 3	Basic details
PART II	Table No 5,6	Reconciliation of GTO
	Table No 7,8	Reconciliation of Taxable Turnover
PART III	Table No 9,10	Reconciliation of Rate-wise liability
	Table No 11	Additional amount payable but not paid
PART IV	Table No 12,13	Reconciliation of ITC
	Table No 14,15	Break-up of ITC into several categories
	Table No 16	Tax payable on un-reconciled difference in ITC
Part V		Additional Liability



Important Clarifications
issued
from time to time

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PRIMARY DATA SOURCE FOR FILING GSTR-9

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Press Release dt 03.07.2019 (Primary Data source)

made.

b) **Primary data source for declaration in annual return:** Time and again taxpayers have been requesting as to what should be the primary source of data for filing of the annual return and the reconciliation statement. There has been some confusion over using **FORM GSTR-1**, **FORM GSTR-3B** or books of accounts as the primary source of information. It is important to note that both **FORM GSTR-1** and **FORM GSTR-3B** serve different purposes. While, **FORM GSTR-1** is an account of details of outward supplies, **FORM GSTR-3B** is where the summaries of all transactions are declared and payments are made. Ideally, information in **FORM GSTR-1**, **FORM GSTR-3B** and books of accounts should be synchronous and the values should match across different forms and the books of accounts. If the same does not match, there can be broadly two scenarios, either tax was not paid to the Government or tax was paid in excess. In the first case, the same shall be declared in the annual return and tax should be paid and in the latter all information may be declared in the annual return and refund (if eligible) may be applied through **FORM GST RFD-01A**. Further, no input tax credit can be reversed or availed through the annual return. If taxpayers find themselves liable for reversing any input tax credit, they may do the same through **FORM GST DRC-03** separately.

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Press Release (Primary Data source)

Press Release

Clarifications on filing of Annual Return (FORM GSTR-9)

The last date for filing of Annual return in **FORM GSTR-9** is 30th June 2019. The trade and industry have raised certain queries with respect to filing of this Annual return which are being clarified as follows:

- a) Information contained in **FORM GSTR-2A** as on 01.05.2019 shall be auto-populated in Table 8A of **FORM GSTR-9**.
- b) Input tax credit on inward supplies shall be declared from April 2018 to March 2019 in Table 8C of **FORM GSTR-9**.
- c) Particulars of the transactions for FY 2017-18 declared in returns between April 2018 to March 2019 shall be declared in Pt. V of **FORM GSTR-9**. Such particulars may contain details of amendments furnished in Table 10 and Table 11 of **FORM GSTR-1**.
- d) It may be noted that irrespective of when the supply was declared in **FORM GSTR-1**, the principle of declaring a supply in Pt. II or Pt. V is essentially driven by when was tax paid through **FORM GSTR-3B** in respect of such supplies. If the tax on such supply was paid through **FORM GSTR-3B** between July 2017 to March 2018 then such supply shall be declared in Pt. II and if the tax was paid through **FORM GSTR-3B** between April 2018 to March 2019 then such supply shall be declared in Pt. V of **FORM GSTR-9**.

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09th October, 2020

Press Release

Annual Return (GSTR-9) and Reconciliation Statement (GSTR 9C) for FY 2018-19

Vide notification No. 69/2020 – Central Tax, dated 30.09.2020, the due date for furnishing of the Annual return for the FY 2018-19 has been extended till 31.10.2020.

2. Certain representations have been received stating that the auto populated GSTR 9 for the year 2018-19 (Tables 4, 5, 6 and 7) also includes the data for FY 2017-18. However, this information for FY 2017-18 has already been furnished by the taxpayers in the annual return (GSTR9) filed for FY 2017-18 and there is no mechanism to show the split of two years (2017-18 & 2018-19) in FORM GSTR-9 for 2018-19.

3. In this regard, it is clarified that the taxpayers are required to report only the values pertaining to Financial Year 2018-19 and the values pertaining to Financial Year 2017-18 which may have already been reported or adjusted are to be ignored. No adverse view would be taken in cases where there are variations in returns for taxpayers who have already filed their **GSTR-9** of Financial Year 2018-19 by including the details of supplies and ITC pertaining to Financial Year 2017-18 in the Annual return for FY 2018-19.

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Instructions No GSTR-9 (Primary Data Source)

2A. [In the Table, against serial numbers 4, 5, 6 and 7, the taxpayers shall report the values pertaining to the financial year only. The value pertaining to the preceding financial year shall not be reported here.]⁵⁸

3. ~~[It may be noted that additional liability for the FY 2017-18 not declared in **FORM GSTR-1** and **FORM GSTR-3B** may be declared in this return. However, taxpayers cannot claim input tax credit unclaimed during FY 2017-18 through this return.]⁵⁹~~

4. Part II consists of the details of all outward supplies & advances received during the financial year for which the annual return is filed. [For FY 2017-18,]⁶⁰It may be noted

⁵⁷ Substituted vide Notf no. 56/2019 – CT dt.14.11.2019

⁵⁸ Inserted vide Notf no. 79/2020-CT dated 15.10.2020

⁵⁹ Omitted vide Notf no. 31/2019 – CT dt. 28.06.2019

that all the supplies for which payment has been made through **FORM GSTR-3B** between July 2017 to March 2018 shall be declared in this part.[It may be noted that additional liability for the FY 2017-18 [or FY 2018-19]⁶¹ [or FY 2019-20]⁶² [or FY 2020-21]⁶³ not declared in **FORM GSTR-1** and **FORM GSTR-3B** may be declared in this return. However, taxpayers cannot claim input tax credit [~~unclaimed during FY 2017-18~~]⁶⁴ through this return.]⁶⁵ The instructions to fill Part II are as follows:



PAYMENT OF UNPAID TAX

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Press Release dt 03.07.2019 (payment of unpaid tax)

a) **Payment of any unpaid tax:** Section 73 of the CGST Act provides a unique opportunity of self – correction to all taxpayers i.e. if a taxpayer has not paid, short paid or has erroneously obtained/been granted refund or has wrongly availed or utilized input tax credit then before the service of a notice by any tax authority, the taxpayer may pay the amount of tax with interest. In such cases, no penalty shall be leviable on such tax payer. Therefore, in cases where some information has not been furnished in the statement of outward supplies in **FORM GSTR-1** or in the regular returns in **FORM GSTR-3B**, such taxpayers may pay the tax with interest through **FORM GST DRC-03** at any time. In fact, the annual return provides an additional opportunity for such taxpayers to declare the summary of supply against which payment of tax is made.

b) **Primary data source for declaration in annual return:** Time and again taxpayers have been requesting as to what should be the primary source of data for filing of the annual return and the reconciliation statement. There has been some confusion over using **FORM GSTR-1**, **FORM GSTR-3B** or books of accounts as the primary source of information. It is important to note that both **FORM GSTR-1** and **FORM GSTR-3B** serve different purposes. While, **FORM GSTR-1** is

Press Release dt 03.07.2019 (payment of unpaid tax)



17 & 18	<p>Summary of supplies effected and received against a particular HSN code to be reported only in this table. It will be optional for taxpayers having annual turnover upto ₹ 1.50 Cr. It will be 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 GSTR-1 may be used for filling up details in Table 17. It may be noted that this summary details are required to be declared only for those inward supplies which in value independently account for 10 % or more of the total value of inward supplies.</p> <p>[For FY 2017-18, [2018-19, 2019-20 and 2020-21]¹⁵⁴]¹⁵⁵, the registered person shall have an option to not fill this table.]¹⁵⁶</p>
19	Late fee will be payable if annual return is filed after the due date.

9. Towards the end of the return, taxpayers shall be given an option to pay any additional liability declared in this form, through **FORM DRC-03**. Taxpayers shall select “Annual Return” in the drop down provided in **FORM DRC-03**. It may be noted that such liability can be paid through electronic cash ledger only



ADDITIONAL ITC CLAIM

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Press Release dt 03.07.2019 (Additional ITC Claim)

obtained/been granted refund or has wrongly availed or utilized input tax credit then before the service of a notice by any tax authority, the taxpayer may pay the amount of tax with interest. In such cases, no penalty shall be leviable on such tax payer. Therefore, in cases where some information has not been furnished in the statement of outward supplies in **FORM GSTR-1** or in the regular returns in **FORM GSTR-3B**, such taxpayers may pay the tax with interest through **FORM GST DRC-03** at any time. In fact, the annual return provides an additional opportunity for such taxpayers to declare the summary of supply against which payment of tax is made.

b) **Primary data source for declaration in annual return:** Time and again taxpayers have been requesting as to what should be the primary source of data for filing of the annual return and the reconciliation statement. There has been some confusion over using **FORM GSTR-1**, **FORM GSTR-3B** or books of accounts as the primary source of information. It is important to note that both **FORM GSTR-1** and **FORM GSTR-3B** serve different purposes. While, **FORM GSTR-1** is an account of details of outward supplies, **FORM GSTR-3B** is where the summaries of all transactions are declared and payments are made. Ideally, information in **FORM GSTR-1**, **FORM GSTR-3B** and books of accounts should be synchronous and the values should match across different forms and the books of accounts. If the same does not match, there can be broadly two scenarios, either tax was not paid to the Government or tax was paid in excess. In the first case, the same shall be declared in the annual return and tax should be paid and in the latter all information may be declared in the annual return and refund (if eligible) may be applied through **FORM GST RFD-01A**. Further, no input tax credit can be reversed or availed through the annual return. If taxpayers find themselves liable for reversing any input tax credit, they may do the same through **FORM GST DRC-03** separately.

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CLAUSE BY CLAUSE ANALYSIS

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Sales disclosure in GSTR-9

Narration	Amount	Disclosure in GSTR-9
Sales as per books	<u>100</u>	
Disclosed in GSTR 3B	70	Table No 4
Disclosed in GSTR 3B in next FY upto Sept	10	Table No 10
Not disclosed at all	20	Table No 4

Inter-play between GSTR-9 & GSTR 9C

GSTR-9	GSTR-9C	Reconciliation type
Table No 5N + 10 -11	Table No 5Q	Annual Turnover reconciliation
Table No (4N-4G) + (10-11)	Table No 7F	Taxable Turnover reconciliation
Tax payable column of 9 + 10-11	Table No 9Q	Tax payable reconciliation
Table No 7J	Table No 12E	Net ITC reconciliation

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BURNING ISSUES

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- Point No 9 of Instructions to GSTR-9: Additional liability to be paid through electronic cash ledger only
- S. 49 Payment of tax, interest, penalty and other amounts
(4) The amount available in the electronic credit ledger may be used for making any payment towards output tax under this Act or under the Integrated Goods and Services Tax Act in such manner and subject to such conditions and within such time as may be prescribed.
- S. 2. (82)
“output tax” in relation to a taxable person, means the tax chargeable under this Act on taxable supply of goods or services or both made by him or by his agent but excludes tax payable by him on reverse charge basis;

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**Additional output
tax liability**

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•S.16.(4) – Time limit
for availing ITC



•Press Release dt.
03.07.2019



•Instructions to GSTR-9

2. Additional ITC Claim



TABLE 8 OF GST-R-9

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Press Release dt.03.07.2019 (Premise of Table 8D of Annual Return)

c) **Premise of Table 8D of Annual Return:** There appears to be some confusion regarding declaration of input tax credit in Table 8 of the annual return. The input tax credit which is declared / computed in Table 8D is basically credit that was available to a taxpayer in his **FORM GSTR-2A** but was not availed by him between July 2017 to March 2019. The deadline has already passed and the taxpayer cannot avail such credit now. There is no question of lapsing of any such credit, since this credit never entered the electronic credit ledger of any taxpayer. Therefore, taxpayers need not be concerned about the values reflected in this table. This is merely an information that the

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Press Information Bureau

Government needs for settlement purposes. Figures in Table 8A of **FORM GSTR-9** are auto-populated only for those **FORM GSTR-1** which were furnished by the corresponding suppliers by the due date. Thus, ITC on supplies made during the financial year 2017-18, if reported beyond the said date by the corresponding supplier, will not get auto-populated in said Table 8A. It may also be noted that **FORM GSTR-2A** continues to be auto-populated on the basis of the corresponding **FORM GSTR-1** furnished by suppliers even after the due date. In such cases there

Table 8A of Annual Return

There are many reasons why the data reported in Table 8A of the GSTR-9 does not match with the data reported in Form GSTR-2A. Some of them include-

- Invoices are saved or submitted in the supplier's Form GSTR-1 but not yet filed. The GSTR-2A will display the status "Not yet filed" in case of such invoices.
- GSTR-1 filed by the supplier after the cut-off date. The cut-off date is the date after which no data will be considered for the Table 8A calculation.
- If the supplier has filed the invoice in his GSTR-1, but mistakenly reported that the supply is liable to reverse charge, the same will not be considered in Table 8A of the recipient.
- If the supplier has mistakenly amended the GSTIN of the recipient, then the ITC will be available only to the amended GSTIN.
- ITC will be excluded from Table 8A if the place of supply (POS) lies in the same state of the supplier and not the recipient. However, this data will still be displayed in the GSTR-2A.
- If the document date was within the period the taxpayer was under the Composition Scheme, then the ITC relating to those purchase invoices will not be considered in Table 8A.



GSTR 2A MIS-MATCH

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S. 16 Eligibility and conditions for taking input tax credit

(2) Notwithstanding anything contained in this section, no registered person shall be entitled to the credit of any input tax in respect of any supply of goods or services or both to him unless,—

(a) he is in possession of a tax invoice or debit note issued by a supplier registered under this Act, or such other tax paying documents as may be prescribed;

(aa) the details of the invoice or debit note referred to in clause (a) has been furnished by the supplier in the statement of outward supplies and such details have been communicated to the recipient of such invoice or debit note in the manner specified under section 37;

(b) he has received the goods or services or both

(c) subject to the provisions of section 41, the tax charged in respect of such supply has been actually paid to the Government, either in cash or through utilization of input tax credit admissible in respect of the said supply; and

(d) he has furnished the return under section 39:



ITC- Vested Right?

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ITC IS VESTED RIGHT...

- *Eicher Motors [8 1999 (106) ELT 3 (SC)] dt 28.01.99*

Right accrued to the assessee on the date when they paid the tax on the raw materials or the inputs and that right would continue until the facility available thereto gets worked out or until those goods existed

- *Dai Ichi Karkaria [1999 (112) ELT 353 (SC)] dt 11.08.99*

Credit validly availed is a vested and indefeasible right and cannot be taken away without the authority of law. Credit is as good as tax paid

- *Madhusudhan Industries [2014 309 ELT 54 Guj HC]*

Credit is a vested right under money credit scheme and the assessee is allowed to utilize such credit even after abolition of the notification providing for utilization of such credit.

ITC IS A CONCESSION...

- *JCB India Ltd [Bom HC 20.03.2018]*

We are of the opinion that there is nothing indefeasible or absolute in the right claimed under the existing law or in transitional arrangements set out, or in the substantive provisions permitting availing of input tax credit

- *Godrej & Boyce Mfg Co Pvt Ltd [1992 3 SCC 624 (SC)] dt. 30.06.1992*

No valid grievance can be made in respect of such deduction when the very extension of the benefit of set-off is itself a boon or a concession. It was open to the rule Making authority to provide for a small abridgement or curtailment while extending a concession

- *Jayam and Company [2016 15 SCC 125] dt 17.07.13*

ITC given under Section 3(3) of TN VAT Act is really a benefit/concession in respect of certain taxable transactions. The ITC provided under Section 3(3) is really a benefit or indulgence. While so, it is open to the State Legislature to impose conditions and restrictions while extending the concession

...ITC IS VESTED RIGHT

- *Rasoil Limited [(2004) 176 ELT 101 (Cal)]*

We are of the opinion that the respondents should consider the request of the appellants made by the letter. All points including the nature and scope of the credit available to the appellants are kept open

...ITC IS A CONCESSION

- *UOI vs Mohit Minerals Pvt Ltd [17 GSTL 561 (SC)]*

Giving credit or set off in the payment is legislative policy which had to be reflected in the legislative scheme. Compensation to States Act, does not indicate giving of any credit or set off of the Clean Energy Cess already paid till 30.06.2017. Thus, claim of the petitioner that he is entitled for set off in payment of Compensation to States Cess to the extent he had already paid Clean Energy Cess cannot be accepted.

- *Mahalaxmi Cotton Ginning Pressing & Oil Industries [W.P. 33 of 2012 dt. 11.05.2012]- Maharashtra VAT*

The right to obtain a set off is a right conferred by statute and the legislature while recognizing an entitlement to a set off in certain circumstances is lawfully entitled to prescribe the conditions subject to which a set off can be obtained. If the legislature, as in the present case, prescribes that a set off should be granted only to the extent to which tax has been deposited in the treasury on the purchase of goods, it is within a reasonable exercise of its legislative power in so

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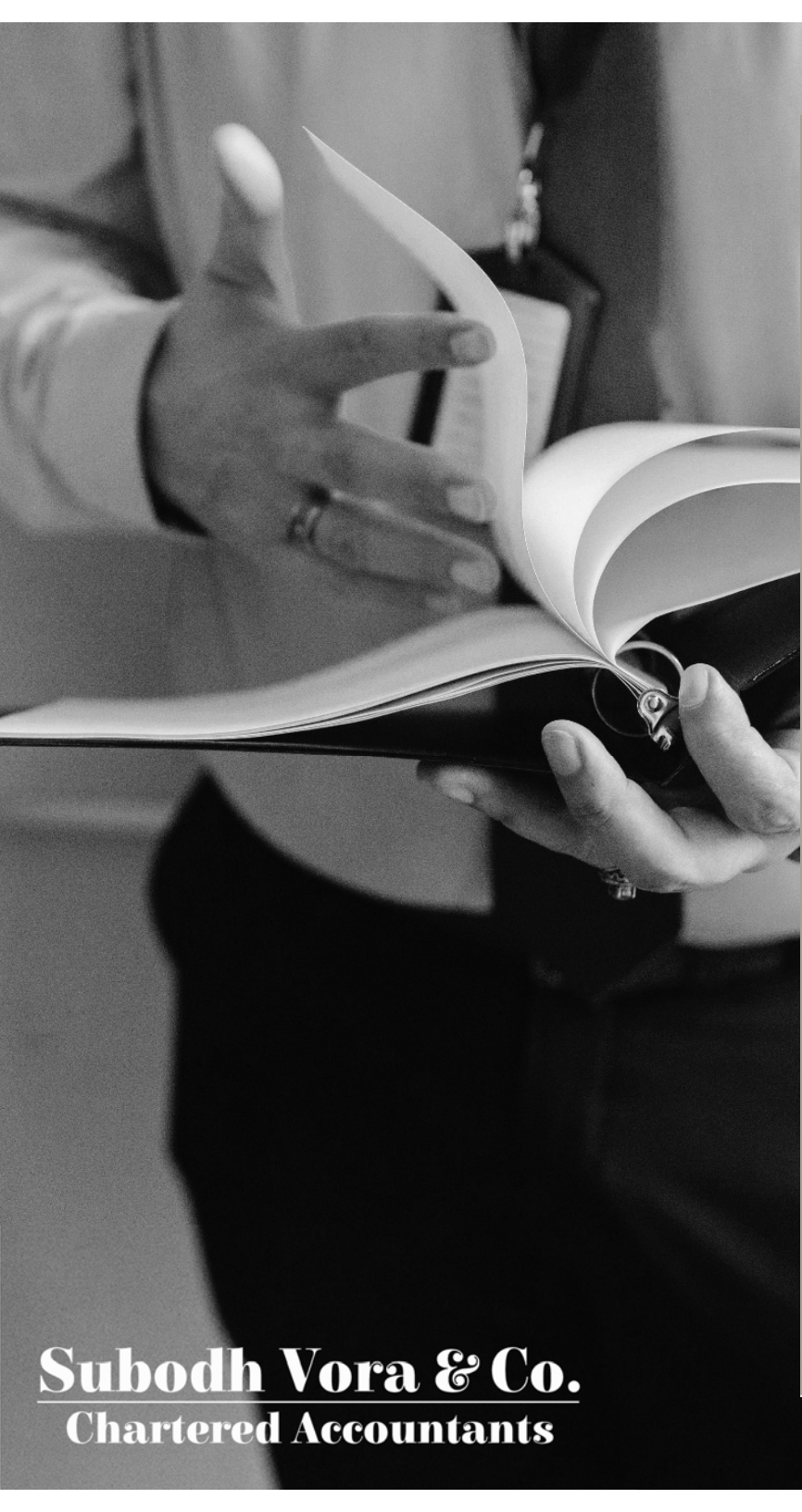
OTHER IMPORTANT DECISIONS

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M/s DY Beathel Enterprises [TS (DB) GST HC (MAD)-
21-22] dt 24.02.21

- *Revenue does not appear to have taken any recovery action against the seller nor has taken a stand that the assessee has not even received the goods*
- *When it has come out that the seller has collected tax from the purchasing dealers, the omission on the part of the seller to remit the tax must have been viewed very seriously and strict action ought to have been initiated against him;*
- *The sellers ought to have been examined and they should have been confronted,*
- *Remanded the matter to the Assessing Officer and parallely, directs initiation of recovery action against the sellers*



Arise India Ltd [W.P.2106/ 2015 dt.26.10.2017]-
Delhi VAT

- *If the Commissioner has not placed such information in the public domain, then it is next to impossible for the purchasing dealer to ascertain the failure of the selling dealer to make a correct disclosure of the sales made in his return.*
- *In the event that the selling dealer has failed to deposit the tax collected by him from the purchasing dealer, the remedy for the Department would be to proceed against the defaulting selling dealer to recover such tax and not deny the purchasing dealer the ITC.*
- *Where, however, the Department is able to come across material to show that the purchasing dealer and the selling dealer acted in collusion then the Department can proceed under Section 40A of the DVAT Act*

Press Release dt 03.07.19

...Taxpayers need not be concerned about the values reflected in this table. This is merely an information that the Government needs for settlement purposes....

Press Release dt 04.05.18

In case of default in payment of tax by the seller, recovery shall be made from the sellerhowever reversal of credit from buyer shall also be an option available with the revenue authorities to address exceptional situations like missing dealer, closure of business by supplier or supplier not having adequate assets.

Press Release dt 18.10.18

It is clarified that the furnishing of outward details in FORM GSTR-1 by the corresponding supplier(s) and the facility to view the same in FORM GSTR-2A by the recipient is in the nature of taxpayer facilitation and does not impact the ability of the taxpayer to avail ITC on self-assessment basis

Government's clarifications from time to time

Statutory Powers of department against the defaulting suppliers

Section 76.
Tax collected but not
paid to government

Section 78.
Initiation of Recovery
proceedings

*Section 79.
Recovery of tax*

E- Invoice & E-way Bills

- ❑ Applicability of E-invoice wef 01.01.2021 for taxpayers having ATO > 100 Crore
- ❑ Sales invoices wherein E-invoice not generated?
- ❑ Non receipt of E-invoice in case of vendors whose ATO > 100 Crore
- ❑ Outward E-way bill summary not matching with Sales summary
- ❑ Inward E-way bill summary not matching with purchase summary

Other Important checks

- ❑ GSTIN status check for top 10 customers and vendors
- ❑ List of RC cancelled dealers from GSTR 2A or dealers who have delayed in filing of GST returns
- ❑ Real Estate Sector- New scheme of GST
- ❑ GST rate changes during the year
- ❑ Important AAR's and judicial pronouncements and its impact

Important Judicial pronouncements

- ❑ Import ocean freight- Mohit Minerals
- ❑ Refund of inverted duty- VKC Footsteps
- ❑ ITC- DY Beathel Enterprises
- ❑ Section 50 amendment for interest
- ❑ Rectification of GSTR 3B- Bharti Airtel
- ❑ ITC Reversal on normal loss- ARS Steel & Alloy
- ❑ Intermediary services- Dharmendra Jani

THANK YOU



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