

Dear Reader,

We hope you are in good health are reading this in the confines of your home.

Taking under review the hardships being faced by various stakeholders due to COVID-19 pandemic, The Hon'ble Finance Minister of India is Nirmala Sitharaman on 24th March, 2020 via a press conference issues certain reliefs related to compliance of various acts with are detailed in the following pages of this note.

The major aspects of the same and our suggestions are as under-

1. Reduced interest @9% p.a. will be charged after 15 Days of regular due date of GSTR-3B for the months of February, March and April, 2020 **for persons with aggregate annual turnover of >= Rs.5 Crores.**
We suggest such persons to arrange for payments and filling of GSTR-3B within 15days of regular due date to avoid the Interest liability. (Ex- GSTR 3B of February,2020 should be filled within 4th April, 2020 to avoid interest @9%).
2. Payment date under **Sabka Vishwas Scheme** shall be extended to 30th June, 2020. No interest for this period shall be charged if paid by 30th June, 2020.
3. For **delay in payment of Advance Tax, Self Assessment Tax, Regular Tax, TDS, TCS, equilization levy, STT & CTT** made between 20th March, 2020 and 30th June, 2020, **reduced interest @ 9% p.a.** will be charged. We suggest assessees to pay the same online, if possible, within the respective due dates to avoid interest @9% p.a.
4. Payment under VIVAD se VISHWAS scheme can be made within 30th June, 2020 without the additional 10%.
5. **No additional filing fees** will be charged for any form submitted to the ROC from 1st April, 2020 to 30th September, 2020.
We suggest Long Term non-compliant companies and LLPs to avail this benefit and complete all pending compliances. The planning for the same can be made during the lockdown period with our consultation.

We request you to not try doing any compliance by putting yourself and your family at risk. Financial losses are temporary, and money can be earned back. Life cannot. **Stay Safe! Stay Indoors!**

Let us know if we can help you in any way during these hard and uncertain times.

Regards,

Raunak Lohia
Partner, VKR & Associates

GST Compliance s

For those having **annual turnover of less than Rs. 5 Crores**, the Due dates for **GSTR-3B which were due in March, April and May 2020** have been extended to 30th June, 2020. **No Interest, No Penalty, No Late fee** will be charged.

Example - The GSTR-3B for February, 2020 is due to be filed on 20th March, 2020. The same can now be filled upto 30th June, 2020.

For those having annual **turnover of equal to or more than Rs. 5 Crores**, the Due dates for **GSTR-3B** which were due in March, April and May 2020 have been extended to 30th June, 2020. But **Interest will be charged @ 9% p.a.** instead of 18% p.a. after 15 days of actual due date. **No Penalty, No Late fee** will be charged if filled within 30th June, 2020.

Example - The GSTR-3B for February, 2020 is due to be filed on 20th March, 2020. The same can now be filled upto 30th June, 2020. However interest @9% p.a. will be charged from 5th April, 2020 till the date of filing GSTR-3B.

Date of Opting for **Composition Scheme** is extended till **30th June, 2020**.

Also, the last date for making payments for the quarter ending 31st March, 2020 and filing of return for 2019-20 by the composition dealers is extended to 30th June, 2020.

Date for filing **GST annual returns** of FY 2018-19 is extended till **30th June, 2020**.

Payment date under **Sabka Vishwas Scheme** shall be extended to **30th June, 2020**. No interest for this period shall be charged if paid by 30th June, 2020.

Due date for issue of notice, notification, approval order, sanction order, filing of appeal, furnishing of return, statements, applications, reports, any other documents, time limit for any compliance under the GST laws where the time limit is expiring between 20th March 2020 to 29th June 2020 shall be extended to **30th June 2020**.

Income Tax Compliance

Last date for filing **income tax returns for FY 2018-19** has been extended from 31st March, 2020 to **30th June, 2020**.

For **delay in payment** of Advance Tax, Self Assessment Tax, Regular Tax, TDS, TCS, equalization levy, STT & CTT made between 20th March, 2020 and 30th June, 2020, **reduced interest @ 9% p.a.** will be charged instead of 12%/18% (as applicable). Also, NO late fee/penalty will be charged for the same.

In respect of **VIVAD se VISHWAS Scheme** **no additional 10% amount** will be payable, if paid within 30th June, 2020.

Due Dates for the following where the time limit expires between 20th March, 2020 and 29th June, 2020, the same shall **be extended upto 30th June, 2020**, -

- issue of notice, intimation, notification, approval order, sanction order
 - filing of appeal, furnishing of return, statements, applications, reports, etc.
 - time limit for completion of proceedings by the authority
 - investment in saving instruments or investments for roll over benefit of capital gains
 - any other time limits under Income Tax Act, Wealth Tax Act, Prohibition of Benami Property Transaction Act, Black Money Act, STT law, CTT Law, Equalization Levy law, Vivad Se Vishwas law.
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Aadhaar-PAN linking date to be extended from 31st March, 2020 to **30th June, 2020**.

ROC Compliance

NO ADDITIONAL FEES will be charged on any form uploaded in the MCA from 1st April 2020 to 30th September, 2020.

Irrespective of the due dates of the forms. **This is a huge opportunity for Long time non-compliant companies/LLPs to make a fresh start.**

Example - If you are a company who has not filled its annual returns (MGT-7 and AOC-4) since 2011, you can file all the required forms without any additional filing fees.

The Companies (Auditor's Report) Order,2020 which was notified on 25th February,2020 will now be **applicable for financial year 2020-21** instead of 2019-20.

Interval between 2 Board meetings can be of maximum **180 days** instead of 120 days till 30th September,2020.However, the requirement of holding 4 board meeting in year is still applicable.

Requirement of **minimum residency in India** for a period of at least 182 days by at least one director of every company is **relaxed for financial year 2019-20**.

Newly incorporated companies can file a declaration for Commencement of Business **within 360 days** of incorporation instead of 180 days.

The requirement for **Independent directors** to hold at least 1 meeting in a financial year without the attendance of Non-independent directors and members of management has been **relaxed for Financial Year 2019-20**

Due Date to create a **Deposit Repayment Reserve** of 20% of Deposits maturing in FY 2020-21 has been increased from 30th April,2020 to **30th June,2020**.

Due Date for Companies to invest or deposit at least 15% of amount of debentures maturing in specified methods of investments or deposits has been increased from 30th April,2020 to **30th June,2020**.

Other
Announcements

24x7 Custom clearance upto 30th June, 2020.

Due date for issue of notice, notification, approval order, sanction order, filing of appeal, furnishing applications, reports, any other documents etc., time limit for any compliance under the Customs Act and other allied Laws where the time limit is expiring between 20th March 2020 to 29th June 2020 shall be extended to 30th June 2020.

Relaxations for 3 months for Debit cardholders to withdraw cash for free from any other banks' ATM;

3 months Waiver of minimum balance fee;

Reduced bank charges for digital trade transactions for all trade finance consumers.
