

## Changes introduced by SEBI Circular dated December 31, 2024 in Filing System

### A. Integrated Filing System

#### What is Integrated Filing?

The integrated filing provides for combining multiple disclosures into a single disclosure. The facility of Integrated Filing has been granted in respect of certain periodic and event-based filings.

The following periodic filings are covered under Integrated Filing System with updated timelines:

Sr. No.	Regulation	Periodic Filing	Revised Timeline	Frequency	Changes in disclosure format
1.	13(3)	Statement on redressal of investor grievances	Within 30 days of the end of the quarter.	Quarterly	<b>Separate filing of this disclosure is not required.</b> This disclosure is <b>included in quarterly Corporate Governance Report</b>
2.	27(2)(a)	Compliance Report on Corporate Governance	Within 30 days of the end of the quarter.	Quarterly	<b>1. Section V - Related Party Transactions and Format for Cyber Security incidence have been deleted.</b> <b>2. Quarterly CG Report</b> shall include: a. Composition of Board of Directors b. Composition of Committee c. Meeting of Board of Directors d. Meeting of Committees e. Affirmations f. Investor Grievance Redressal Report <b>3. Half yearly CG Report</b> shall include: a. All above quarterly disclosures b. Disclosure of Loans / Guarantees / Comfort Letters / Securities Etc. c. Affirmations on compliance requirements for AGM <b>4. Annual CG Report</b> shall include: a. All quarterly disclosures b. Disclosure of Loans / Guarantees / Comfort Letters / Securities Etc. c. Website affirmations d. Affirmations w.r.t. compliance with corporate governance provisions
3.	23(9)	Disclosure of Related Party	Within 45 days of the end of the	Half Yearly	<b>1. Separate filing is not required.</b> This disclosure is <b>included in half yearly Financial Results.</b>

Website: [www.csabhishekwagh.com](http://www.csabhishekwagh.com)

Email id: [waghabhi2@gmail.com](mailto:waghabhi2@gmail.com)

Mob: 9702908418

		Transactions (RPTs)	quarter & 60 days from end of the last quarter & financial year.		2. The value of <b>transactions ratified during</b> the half year is also required to be reported in the half yearly RPT statement.
4.	Reg. 30 r/w section V-B of the Master Circular	Quarterly disclosure of outstanding default on loans / debt securities		Quarterly	This is <b>included in quarterly financial results</b> .
5.	32(1)	Statement of Deviation and Variation <small>Refer Note 2</small>		Quarterly	<b>Separate filing is not required.</b> This disclosure is <b>included in half yearly Financial Results</b>
6.	33(3)	Financial results		Quarterly	<p>1. <b>Quarterly Financial Results</b> shall include:</p> <ol style="list-style-type: none"> <li>Quarterly financial results</li> <li>Statement on deviation or variation for proceeds of funds raised</li> <li>Disclosure of outstanding default on Loans and Debt Securities</li> </ol> <p>2. <b>Half yearly Financial Results</b> shall include:</p> <ol style="list-style-type: none"> <li>Half yearly financial results</li> <li>Statement on deviation or variation for proceeds of funds raised</li> <li>Disclosure of outstanding default on Loans and Debt Securities</li> <li>Disclosure of Related Party Transactions</li> </ol> <p>3. <b>Annual Audited Financial Results</b> shall include:</p> <ol style="list-style-type: none"> <li>Annual audited financials</li> <li>Statement on deviation or variation for proceeds of funds raised</li> <li>Disclosure of outstanding default on Loans and Debt Securities</li> <li>Disclosure of Related Party Transactions <small>Refer Note 1</small></li> <li>Statement on Impact of Audit Qualifications</li> </ol>

**Note 1: Related Party Transactions:**

1. Disclose opening and closing balances, including commitments, for existing RPTs, even if there are no new transactions in the reporting period.
2. Transactions between members of a consolidated entity (e.g., between a listed entity and its subsidiary) need to be reported only once.
3. Listed banks are exempt from disclosing RPTs related to loans, inter-corporate deposits, advances, or investments.
4. For companies with financial years ending March 31, provide data for six months ending September 30 and March 31. For other fiscal year-end dates, adjust reporting periods accordingly.
5. Each RPT type (e.g., sale or purchase of goods/services, loans, or investments) with a single party must be disclosed separately. Aggregation of the same type of transactions with one party is allowed, but netting off is prohibited (e.g., sales and purchases must be shown separately).

**6. Multi-Year Transactions:**

1. Disclose aggregate values approved and ratified by the audit committee in separate columns.
2. Report actual transaction value for the period in the "Value during the reporting period" column.
7. 'Cost' Refers to the cost of borrowed funds for the listed entity.
8. PAN of related parties will not be displayed on stock exchange websites.
9. Transactions such as fixed deposits accepted by banks or NBFCs under uniform terms applicable to all shareholders/public must be reported.

**Note 1: Statement of Deviation and Variation**

**NIL Statement** of Deviation and Variation is not required to be filed.

**Note 3: Extension for Dec 31, 2024 filing**

The first quarterly **Integrated Filing**, comprising **Integrated Filing (Governance)** and **Integrated Filing (Financial)**, applicable for the quarter ending **December 31, 2024**, has been granted a relaxation. Entities may file the said integrated filings within an extended period of **45 days from the end of the quarter**, i.e., by **February 14, 2025**.

## **B. System Driven Disclosure**

The manual filing of the following disclosure is not required. Instead, the disclosures will be auto generated by stock exchanges.

Sr. No.	Regulation	Periodic / Event Filing	Remark
1.	31	Shareholding Pattern	Companies are not required to file share holder pattern manually. Under system driver disclosure, the depositories are required to provide shareholding pattern to Stock Exchange and stock exchange shall disseminate the Share Holding pattern. However, companies are required to ensure that data is accurate.
2.	30(6) r/w sub-para 3 of para A of part A of schedule III of LODR	New rating(s) or revision in ratings	New rating(s) or revision in ratings

## **C. Additional Quarterly Disclosures**

Sr. No.	Regulation	Periodic Filing	Remark
1.	30 read with Para A(1) of Part A of Schedule III of LODR	<b>Acquisition of 5% or more</b> shares or voting rights in an unlisted company, or any subsequent change exceeding <b>2%</b>	Quarterly disclosure is required  Whenever, during the quarter, the listed entity acquires 5% stake in an unlisted company  or  Listed Entity is already holding 5% in the unlisted entity and there is 2% change.
2.	30 read with Para A(20) of Part A of Schedule III of LODR	Imposition of fine or penalty by sectoral regulatory enforcement agency or authorities/judicial bodies	<b>Quarterly disclosure</b> is required  Whenever, during the quarter  Fine or penalty is levied of  Less than Rs. 1 Lakh by Sectoral regulator/enforcement agency or  Less than Rs. 10 Lakh by authorities/judicial bodies.

			In cases where the amount of fine or penalty is more than above, disclosure must be given <b>within 24</b> hours.
3.	30 read with Para B (8) of Part A of Schedule III of LODR	Updates on ongoing tax proceedings and litigations or disputes	<p>Disclosure regarding update on tax disputes and ongoing litigations needs to be given on quarterly basis.</p> <p>The <b>litigation or disputes</b> shall mean and include:</p> <p>When the listed entity, its directors, key management personnel, senior management, promoters, or subsidiaries become involved in or are subject to any litigation, assessment, adjudication, arbitration, or dispute proceedings, including interim orders, that could reasonably impact the entity.</p>

#### **D. Single Filing System**

Single filing system is API-based integration between stock exchanges. This system will allow dissemination of disclosure to all stock exchanges where the company is listed by filing a disclosure on one single stock exchange.

For examples, if a company is listed in NSE and BSE then Corporate Governance Report filed by the company on NSE will be disseminated on both Exchanges i.e., NSE and BSE.

The single filing system is applicable to following disclosures:

Sr. No.	Regulation	Periodic Filing
1.	13(3)	Statement on Redressal of Investor Grievances
2.	27(2)(a)	Corporate Governance Report
3.	DP Regulations	Reconciliation of Share Capital Audit Report
4.	44(3)	Voting Results