



# **GST Compliances (Return Filing & GST Audit)**

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## **GST returns**



## Summary of Returns - Due dates



Form of Return	Particulars	Tax period	Date of Filing	Payment date
GSTR 1	Outward Supplies	Monthly/ Quarterly	11 <sup>th</sup> of next month	-
GSTR 2	Inward Supplies	Monthly/ Quarterly	15 <sup>th</sup> of the next month	-
GSTR-3	Monthly Return	Monthly/ Quarterly	20 <sup>th</sup> of the next month	20 <sup>th</sup> of the next month
GSTR-3B	Summary Return to be filed from July to March 2018	Monthly	20 <sup>th</sup> of the next month	20 <sup>th</sup> of the next month
GSTR – 4	Composite Suppliers	Quarterly	18 <sup>th</sup> of the next quarter	18 <sup>th</sup> of the next quarter
GSTR -5	Return for Non resident Taxable person	Monthly	20 <sup>th</sup> of the next month or 7 <sup>th</sup> after the last day of the period of registration	Date of filing return

15.09.2018

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5



Form of Return	Particulars	Tax period	Date of Filing	Payment date
GSTR–5A	Online information and database access or retrieval services.	Monthly	20 <sup>th</sup> of the next month	
GSTR-6	ISD	Monthly	13 <sup>th</sup> of the next month	-
GSTR-7	Person Deducting TDS	Monthly	10 <sup>th</sup> of the next month	-
GSTR-8	E-Commerce Operator		10 <sup>th</sup> of the next month	
GSTR-9	Annual Return	Yearly	31 <sup>st</sup> Dec	-
GSTR-10	Final Return	Once		-
GSTR-11	Details of inward supplies to be furnished by a person having UIN	Quarterly		

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# Summary of GSTR-1



Sr. No.	Particulars
1	GSTIN
2 (a)	Legal name of the registered person
2(b)	Trade name, if any
3(a)	Aggregate Turnover in the preceding Financial Year
<b>4</b>	<b><u>Taxable outward supplies made to registered persons (including UIN-holders) other than supplies covered by Table 6</u></b>
A	Supplies other than those (i) attracting reverse charge and (ii) supplies made through ecommerce operator
B	Supplies attracting tax on reverse charge basis
C	Supplies made through e-commerce operator attracting TCS (operator wise, rate wise) GSTIN of e-commerce operator

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5

# Summary of GSTR-1



Sr. No.	Particulars
<b>5</b>	<b><u>Taxable outward inter-State supplies to un-registered persons where the invoice value is more than Rs 2.5 lakh</u></b>
A	Outward supplies (other than supplies made through e-commerce operator, rate wise)
B	Supplies made through e-commerce operator attracting TCS (operator wise, rate wise) GSTIN of e-commerce operator
<b>6</b>	<b><u>Zero rated supplies and Deemed Exports</u></b>
A	Exports
B	Supplies made to SEZ unit or SEZ Developer
C	Deemed exports

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6

# Summary of GSTR-1



Sr. No.	Particulars
<b><u>7</u></b>	<b><u>Taxable supplies (Net of debit notes and credit notes) to unregistered persons other than the supplies covered in Table 5</u></b>
A	Intra-State supplies
B	Inter-State Supplies where invoice value is upto Rs 2.5 Lakh [Rate wise]
<b><u>8</u></b>	<b><u>Nil rated, exempted and non GST outward supplies</u></b>
A	Inter-State supplies to registered persons
B	Intra- State supplies to registered persons
C	Inter-State supplies to unregistered persons
D	Intra-State supplies to unregistered persons

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7

# Summary of GSTR-1



Sr. No.	Particulars
<b><u>9</u></b>	<b><u>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]</u></b>
A	If the invoice/Shipping bill details furnished earlier were incorrect
B	Debit Notes/Credit Notes/Refund voucher [original]
C	Debit Notes/Credit Notes/Refund voucher [amendments thereof]
<b><u>10</u></b>	<b><u>Amendments to taxable outward supplies to unregistered persons furnished in returns for earlier tax periods in Table 7</u></b>
A	Intra-State Supplies
B	Inter-State Supplies

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8

# Summary of GSTR-1



Sr. No.	Particulars
<b>11</b>	<b><u>Consolidated Statement of Advances Received/Advance adjusted in the current tax period/ Amendments of information furnished in earlier tax period</u></b>
I	Information for the current tax periodt
II	Amendment of information furnished in Table No. 11[1] in GSTR-1 statement for earlier tax periods
<b>12</b>	<b><u>HSN-wise summary of outward supplies</u></b>
<b>13</b>	<b><u>Documents issued during the tax period</u></b>
	Verification

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9

# Summary of GSTR-3B



Sr. No.	Particulars
1	GSTIN
2	Legal name of the registered person
<b>3.1</b>	<b><u>Details of Outward Supplies and inward supplies liable to reverse charge</u></b>
A	Outward taxable supplies (other than zero rated, nil rated and exempted)
B	Outward taxable supplies (zero rated )
C	Other outward supplies (Nil rated, exempted)
D	Inward supplies (liable to reverse charge)
E	Non-GST outward supplies

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10

## Summary of GSTR-3B



Sr. No.	Particulars
<b>3.2</b>	<b>Of the supplies shown in 3.1 (a) above, details of inter-State supplies made to unregistered persons, composition taxable persons and UIN holders</b>
	Supplies made to Unregistered Persons
	Supplies made to Composition Taxable Persons
	Supplies made to UIN holders
<b>4</b>	<b>Eligible ITC</b>
A	ITC Available (whether in full or part)
B	ITC Reversed
C	Net ITC Available (A) – (B)
D	Ineligible ITC
<b>5.</b>	<b>Values of exempt, nil-rated and non-GST inward supplies</b>
<b>6.1</b>	<b>Payment of tax</b>
<b>6.2</b>	<b>TDS/TCS Credit</b>

## Annual return – An Introduction



- **Persons required to file**
  - Regular Registered Person - GSTR-9
  - Composition Taxable Person – GSTR-9A
  - E. Commerce Operator (GST-TDS) – GSTR-9B
- **Persons not required to file**
  - Input Service Distributor
  - Casual Taxable Person
  - Non-Resident Taxable Person
  - Person required for Collect Tax as Source (GST TCS)
  - Dept of CG/SG/LA whose BoA are subject to audit by the CAG or an auditor appointed for auditing the accounts of LA
- Due Date – 30<sup>th</sup> June 2019 (RoD Order No. 3/2018 dtd. 31/12/18)
- Late Fee – Rs. 100 per day or 0.25% of T/o in State – Each under CGST & SGST
- All GSTR-1 and GSTR-3B upto March 2018 to be filed before filing Annual return

- Currently, the system auto-populates data based on GSTR-1 & GSTR-3B to the extent possible which the assessee can edit.
- However, the fields, where the system computed values are modified by more/less than 20% by the assessee, the same shall be highlighted in 'Red' for reference and attention by the system.
- The system also auto-populates ITC based on GSTR-2A as generated by the system based on GSTR-1 filed by your corresponding suppliers. Till now the system has updated data upto 28/02/2019. Next update of ITC based on GSTR-2A will happen soon. If the assessee have some missing credits in GSTR-2A, then the taxpayer will have to wait till the next update.
- In case of any additional liability, the taxpayer can pay the same through Form GST DRC-03. The system will give the link to navigate to Form GST DRC-03 after filing of GSTR-9. Accordingly, it appears that the system will not restrict the taxpayers for filing GSTR-9 even without paying additional liability.

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13

## List of documents required to be maintained

- Inward and outward supply of goods or services or both
- Stock of goods
- Input tax credit availed
- Output tax payable and paid
- Goods and Services imported and exported
- Supplies attracting payment of tax on reverse charge mechanism along with along relevant documents such as invoices, credit notes, debit notes, refund vouchers, bill of supply etc.
- Advances received, paid and adjustments thereof

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14

## **Prerequisite for GST Annual return and Audit**

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- Understanding of Accounting
- Understanding of the GST Laws
- IT Infrastructure
- Applicability of various notification, circulars, clarifications,
- Classification and nature of supplies
- Manner of availment of credit

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15

## **Document require to start GST Annual return & Audit**

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- GSTR1, GSTR3B, GSTR2A, TRAN1, TRAN2
- Statutory Audit Report, Income Tax Audit Report, Cost Audit Report, Branch Auditors Report etc.
- Signed Copy of Financial Statements, along with notes, schedules, groupings, segment reports etc.
- Consolidated and GSTIN wise trial balance and financial statements of registrations
- Reconciliation of figures pre and post GST GSTIN wise.
- GSTIN and password

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16



# Annual return – A Glimpse

Parts	Particulars Required
Part-I	Basic Details
Part-II	Details of Outward and inward supplies made during the financial year <del>As declared in the return during the financial year</del>
Part-III	Details of ITC for the financial year
Part-IV	Details of tax paid <u>as declared in returns</u> filed during the financial year
Part-V	Particulars of the transactions for the previous FY declared in returns of <u>April to September of current FY</u> or upto date of filing of annual return of previous FY whichever is earlier.
Part-VI	Other Information

Next Financial Year

13.06.2019

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19

Pt. I	Basic Details	
1.	Financial Year	
2.	GSTIN	
3A.	Legal Name	
3B.	Trade Name (If Any)	

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20

Pt. II Details of Outward and inward supplies made during the financial year						
			(Amount in Rs.in all tables)			
	Nature of Supplies	Taxable Value	Central Tax	State/UT Tax	Integrated Tax	Cess
4	<b>Details of advances, inward and outward supplies made during the financial year on which tax is payable</b>					
A	Supplies made to un-registered persons (B2C)	All B2C, B2C Large, Interstate, Intrastate including through E commerce operator to be reported as per <b>BoA</b> . <b>Dr./Cr/ Note, Amendments to be adjusted</b> and Net value to be disclosed (Table 5, 7, 9, 10 – GSTR-1)				
B	Supplies made to registered persons (B2B)	All B2B including deemed supply related party and distinct person, Interstate, Intrastate to be reported as per <b>BoA</b> . No reporting of supplies on which recipient is paying RCM (Table 4A, 4C – GSTR-1)				
C	Zero rated supply (Export) on payment of tax (except supplies to SEZs)	All exports on payment of IGST as per <b>BoA</b> ( <b>Non LUT</b> ) (Table 6A– GSTR-1)				
D	Supply to SEZs on payment of tax	All SEZ Supplies on payment of IGST as per <b>BoA</b> ( <b>Non LUT</b> ) (Table 6B– GSTR-1)				
E	Deemed Exports	Supplies to Merchant Exporter - Deemed Exports as per <b>BoA</b> (Table 6C –GSTR-1)				
13.06.2019		CA Sumit Jhunjhunwala				21

F	Advances on which tax has been paid but invoice has not been issued (not covered under (A) to (E) above)	Details of Unadjusted advances as per <b>BoA</b> (Table 11A – GSTR-1)
G	Inward supplies on which tax is to be paid on reverse charge basis	Supplies on which 9(3)/5(3) or 9(4)/5(4) is applicable as per <b>BoA</b> . (Table 3.1(d) – GSTR-3B) <b>Does not Include</b> Import of Goods on BoE.
H	Sub-total (A to G above)	
I	Credit Notes issued in respect of transactions specified in (B) to (E) above (-)	Cr. Note for B2B, Zero Rated, Deemed Exports as per <b>BoA</b> to be included.(Table 9B –GSTR-1).Doesn't include refund vouchers for advance
J	Debit Notes issued in respect of transactions specified in (B) to (E) above (+)	Dr. Note for B2B, Zero Rated, Deemed Exports as per <b>BoA</b> to be included. (Table 9B – GSTR-1).
K	Supplies / tax declared through Amendments (+)	Amendments for B2B, Zero Rated, Deemed Exports, Dr/Cr. Notes as per <b>BoA</b> to be included (Table 9A, 9C – GSTR-1). Change in the value to be disclosed.
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	
13.06.2019		CA Sumit Jhunjhunwala 22

5	<b>Details of Outward supplies made during the financial year on which tax is not payable</b>	
A	Zero rated supply (Export) without payment of tax	All Exports without payment of IGST as per <b>BoA</b> (LUT) (Table 6A– GSTR-1)
B	Supply to SEZs without payment of tax	All SEZ Supplies without payment of IGST as per <b>BoA</b> (LUT) (Table 6B– GSTR-1)
C	Supplies on which tax is to be paid by the recipient on reverse charge basis	Supplies on which 9(3)/5(3) is applicable to recipient as per <b>BoA</b> (Table 4B– GSTR-1)
D	Exempted	Exempt under Notification No. 1/2017-CT(R) or 12/2017- CT(R), etc.
E	Nil Rated	Nil Rated under Notification No. 2/2017-CT(R) or 11/2017- CT(R), etc.
F	Non-GST supply (includes ‘ <b>no supply</b> ’)	Non- GST Supplies like Alcohol, Petrol, Diesel, <b>Schedule III, Securities</b> , etc. (Table 8 – GSTR-1)
G	Sub-total (A to F above)	

H	Credit Notes issued in respect of transactions specified in A to F above (-)	Cr. Note for Zero Rated, RCM as per <b>BoA</b> to be included.(Table 9B –GSTR-1).
I	Debit Notes issued in respect of transactions specified in A to F above (+)	Dr. Note for Zero Rated, RCM as per <b>BoA</b> to be included. (Table 9B – GSTR-1).
J	Supplies declared through Amendments (+)	Amendments for Zero Rated, RCM as per <b>BoA</b> to be included (Table 9A, 9C – GSTR-1)
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)	

Pt. III Details of ITC for the financial year						
	Description	Type	Central Tax	State/UT Tax	Integrated Tax	Cess
<b>6</b>	<b><u>Details of ITC availed during the financial year</u></b>					
A	Total amount of input tax credit availed through FORM GSTR-3B (sum total of Table 4A of FORM GSTR-3B)	Auto Populated from Table 4A of GSTR-3B for July 2017 to March 2018 (No amendment allowed)				
B	Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)	Inputs	ITC on Inward supplies claimed on basis of tax Invoice issued by Supplier availed <b>as per GSTR-3B</b> (Table 4(A)5 – GSTR-3B)			
		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	ITC on Inward Supplies (net off) on which RCM under 9(4)/5(4) has been paid by recipient and availed <b>as per GSTR-3B</b> (Applicable upto 12 <sup>th</sup> Oct, 2017) (Table 4(A)3 – GSTR-3B)			
		Capital Goods				
		Input Services				

13.06.2019

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25

D	Inward supplies received from registered persons liable to reverse charge (other than B above) on which tax is paid and ITC availed	Inputs	ITC on Inward Supplies on which RCM under 9(3)/5(3) has been paid by recipient and availed <b>as per GSTR-3B</b> (Table 4(A)3 – GSTR-3B)
		Capital Goods	
		Input Services	
E	Import of goods (including supplies from SEZs)	Inputs	ITC taken on BoE for IGST paid on Import of goods (incl. from SEZ) and availed <b>as per GSTR-3B</b> (Table 4(A)1 – GSTR-3B)
		Capital Goods	
F	Import of services (excluding inward supplies from SEZs)	ITC taken for IGST paid on Import of service and availed <b>as per GSTR-3B</b> (Table 4(A)2 – GSTR-3B)	
G	Input Tax credit received from ISD	ITC taken on credit distributed by ISD and availed <b>as per GSTR-3B</b> (Table 4(A)4 – GSTR-3B)	
H	Amount of ITC reclaimed (other than B above) under the provisions of the Act	ITC Reclaimed <b>as per GSTR-3B</b> (eg. Invoice value paid after 180 days). Original availment to be shown in 6B above, reversal in 7A below and <b>reclaim amount to be shown here</b> . This value not to be included in 6B above	
I	Sub-total (B to H above)		
J	Difference (I - A above)		

13.06.2019

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26

K	Transition Credit through TRAN-I (including revisions if any)	Credit taken under GST TRAN-I including Revised TRAN-1
L	Transition Credit through TRAN-II	Credit taken under GST TRAN-II
M	Any other ITC availed but not specified above	ITC taken upon registration, Sale, Merger/Demerger etc under Form ITC-01, ITC-02, etc
N	Sub-total (K to M above)	
O	Total ITC availed (I + N above)	

<b>7</b>	<b><u>Details of ITC Reversed and Ineligible ITC for the financial year</u></b>	
A	As per Rule 37	ITC Reversal of credit on non-payment of Invoice in 180 days. If not reversed than?
B	As per Rule 39	Reversal of credit on account of excess distribution of credit by ISD
C	As per Rule 42	ITC reversal of Inputs and Input Service attributable to Exempt/Non Business
D	As per Rule 43	ITC reversal of Capital Goods attributable to Exempt/Non Business
E	As per section 17(5)	If credit taken and later reversed u/s 17(5). <u>No disclosure of Table 4D of GSTR-3B</u>
F	Reversal of TRAN-I credit	Transitional Credit reversed thru Table 4B of GSTR-3B.
G	Reversal of TRAN-II credit	<b>Whether Tran Credit reversal thru GST DRC-03 to be disclosed here?</b>
H	Other reversals (pl. specify)	Credit reversal for switch to Composition/ Supply become Exempt (ITC-03), etc.
I	Total ITC Reversed (Sum of A to H above)	
J	Net ITC Available for Utilization (60 - 7I)	

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8	Other ITC related information	
A	ITC as per GSTR-2A (Table 3 & 5 thereof)	Auto Populated
B	ITC as per sum total of 6(B) and 6(H) above	Total from previous Table
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 <b>but availed during April to Sept 2018-next Financial year</b>	ITC availed during April to Sep 2018 to be disclosed here.  <b>What about ITC taken from Oct 18 to Mar 2019 under ROD Order No. 2/2018-CT</b>
D	Difference [A-(B+C)]	Difference can be negative if ITC as per GSTR-3B is more than GSTR-2A. Negative values are allowed
E	ITC available but not availed	ITC not taken in GSTR-3B - which is liable to be lapsed
F	ITC available but ineligible	ITC not taken in GSTR-3B since ineligible – Eg. 17(5)

13.06.2019

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29

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G	IGST paid on import of goods (including supplies from SEZ)	IGST paid as per BoE for Imports and clearance from SEZ to DTA
H	IGST credit availed on import of goods (as per 6(E) above)	ITC taken on BoE for IGST paid on Import of goods (incl. from SEZ) and availed <b>as per GSTR-3B</b> (Table 4(A)1 – GSTR-3B) Same figure from Table 6E above
I	Difference (G-H)	Difference may be on account of IGST paid but goods not cleared from Bonded Warehouse by 31 <sup>st</sup> March 2019?
J	ITC available but not availed on import of goods (Equal to I)	Whether above credit will be lapsed?
K	Total ITC to be lapsed in current financial year (E + F + J)	Only for information purpose, will not impact input credit ledger but may lead to scrutiny

13.06.2019

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30

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/UT Tax	Integrated Tax	Cess
	Integrated Tax						
	Central Tax						
	State/UT Tax						
	Cess						
	Interest						
	Late Fee						
	Penalty						
13.06.2019	Other		CA Sumit Jhunjhunwala				31

**Paid figures are freezed As per Table 6.1 of Form GSTR-3B**

**What about tax/other amount paid through Form GST DRC-03**

Next Financial Year		
Pt. V	Particulars of the transactions for the previous FY declared in returns of <b>April to September of current FY</b> or upto date of filing of annual return of previous FY whichever is earlier	
10	Supplies / tax declared through Amendments (+) (net of debit notes)	Amendments declared in April 2018 to Sep 18 (Table 9A, 9B, 9C of GSTR-1 of 18-19)
11	Supplies / tax reduced through Amendments (-) (net of credit notes)	
12	Reversal of ITC availed during previous financial year	Details from Table 4(B) of GSTR-3B of 18-19 (Rule 37, 42, Tran I Cr. Reversal)
13	ITC availed for the previous financial year	Details from Table 4(A) of GSTR-3B of 18-19

13.06.2019

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32

<b>14</b>	<b><u>Differential tax paid on account of declaration in 10 &amp; 11 above</u></b>		
	Description	Payable	Paid
	Integrated Tax		
	Central Tax		
	State/UT Tax		
	Cess		
	Interest		

**As per Table  
6.1 of Form  
GSTR-3B**

<b>Pt. VI</b>	<b>Other Information</b>							
<b>15</b>	<b>Particulars of Demands and Refunds</b>							
	Details	Central Tax	State/UT Tax	Integrated Tax	Cess	Interest	Penalty	Late Fee/ Others
A	Total Refund Claimed	Refer Form RFD-01/01A						
B	Total Refund Sanctioned	Refer Form RFD-06 <b>Provisional sanctioned?</b>						
C	Total Refund Rejected	Refer Form RFD-06						
D	Total Refund Pending							
E	Total demand of taxes	Check online GTST Portal also for any demand notice, which are pending						
F	Total taxes paid in respect of E Above	Details of Accepted demand, which is already paid						
G	Total demands Pending out of E Above	Unpaid demand. Unacceptable/litigative demand – Whether Appeal is filed?						



<b>16</b>	<b>Information on supplies received from composition taxpayers, deemed supply under section 143 and goods sent on approval basis</b>	
A	Supplies received from Composition taxpayers	Info may be taken from Table 5 of GSTR-3B
B	Deemed supply under Section 143	Goods sent to job worker not received in prescribe time.
C	Goods sent on approval basis but not returned	

17	<b><u>HSN Wise Summary of outward supplies</u></b>							
HSN	UQC	Total quantity	Taxable Value	Rate of Tax	Central Tax	State/UT Tax	Integrated Tax	Cess
Data can be taken from Table 12 of GSTR-1. To be reported Net of Sales returns. UQC applicable only for Goods.								
18	<b>HSN Wise Summary of Inward supplies</b>							
HSN	UQC	Total quantity	Taxable Value	Rate of Tax	Central Tax	State/UT Tax	Integrated Tax	Cess
If inward supply of particular item is 10% of more of total inward supply, then details to be reported for such items only								
19	Late fee payable and Paid				Payable		Paid	
A	Central Tax							
B	State Tax							

# GST Audit – An Introduction



## Who is required to undergo GST Audit - Sec 35 (5)

*“**Every registered person** whose **turnover** during a financial year exceeds the prescribed limit shall get his accounts audited by a chartered accountant or a cost accountant and shall submit a copy of the audited annual accounts, the reconciliation statement under sub-section (2) of Section 44 and such other documents in such form and manner as may be prescribed”.*

## What is the turnover limit for GST audit - Rule 80(3)

*“**Every registered person** whose **aggregate turnover** during a financial year exceeds two crore rupees shall get his accounts audited as specified under sub-section (5) of Section 35 and he shall furnish a copy of the audited annual accounts and a reconciliation statement, duly certified, in GSTR 9C, electronically through the common portal either directly or through a Facilitation Centre notified by the Commissioner”.*

13.06.2019

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37

# Aggregate Turnover



2(6) 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;

- Dealer of Second Hand Goods
- Air Travel Agent
- Forex Dealer
- Life Insurance
- Pure Agent – Reimbursement
- Sale of Capital Goods

13.06.2019

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38

## Documents to Accompany GSTR-9C

*Every registered person who is required to get his accounts audited in accordance with the provisions of sub-section (5) of Section 35 shall furnish, electronically, the*

- *annual return under sub-section (1) along with a*
- *copy of the audited annual accounts and a*
- *reconciliation statement, reconciling the value of supplies declared in the return furnished for the financial year with the audited annual financial statement, and*
- *such other particulars as may be prescribed.*

13.06.2019

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39

## GSTR-9C – A Glimpse

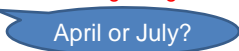

Parts	Particulars Required
PART A – Reconciliation Statement	
Part-I	Basic Details
Part-II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)
Part-III	Reconciliation of tax paid
Part-IV	Reconciliation of Input Tax Credit (ITC)
Part-V	Auditor's recommendation on additional Liability due to non-reconciliation
Part B - CERTIFICATION	
I.	Certification in cases where the reconciliation statement (FORM GSTR-9C) is drawn up by the person who had conducted the audit:
II.	Certification in cases where the reconciliation statement (FORM GSTR-9C) is drawn up by a person other than the person who had conducted the audit of the accounts

13.06.2019

CA Sumit Jhunjhunwala

40

Pt. I	Basic Details	
1.	Financial Year	
2.	GSTIN	
3A.	Legal Name	
3B.	Trade Name (If Any)	
4	Are you liable to audit under any Act?	

Pt. II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)		
5	<u>Reconciliation of Gross Turnover</u>		
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)		Turnover as per the audited Annual Financial Statement shall be declared here. For Multiple GSTIN entity, internally derive GSTIN wise turnover.
B	Unbilled revenue at the <b>beginning of Financial Year</b> 	(+)	Unbilled revenue in the BoA (accrual system) in the last F.Y. & was c/f to the current F.Y. shall be declared here
C	Unadjusted advances at the end of the Financial Year	(+)	Advances on which GST has been paid but revenue not recognized AFS
D	<b>Deemed Supply</b> under Schedule I 	(+)	Deemed supply already part of the T/o AFS not required to be included here.
E	Credit Notes issued after the end of the financial year but reflected in the annual return	(-)	GST Credit notes issued between <b>April to Sep 2018</b>
F	Trade Discounts accounted for in the audited Annual Financial Statement but are not permissible under GST	(+)	Commercial Discount (Non GST) to be disclosed here (if value of CN is reducing T/o in AFS)
G	Turnover from April 2017 to June 2017	(-)	Turnover included in the AFS for Apr to Jun 2017

H	Unbilled revenue at the end of Financial Year	(-)	Unbilled revenue in the BoA (accrual system) in the current
I	Unadjusted Advances at the beginning of the Financial Year	(-)	Advances on which GST has been paid but revenue not recognized AFS
J	Credit notes accounted for in the audited Annual Financial Statement but are not permissible under GST	(+)	Commercial Credit notes (Non GST) to be disclosed here (if value of CN is reducing T/o in AFS)
K	Adjustments on account of supply of goods by SEZ units to DTA Units	(-)	Filled by SEZ Unit which is supplying to DTA (DTA to pay under Import)
L	Turnover for the period under composition scheme	(-)	
M	Adjustments in turnover under section 15 and rules thereunder	(+/-)	Related party Transaction, Branch Transfer, Sch I, ATA, Forex Dealer
N	Adjustments in turnover due to foreign exchange fluctuations	(+/-)	
O	Adjustments in turnover due to reasons not listed above	(+/-)	Eg: Cash Basis accounting, Construction, etc
P	Annual turnover after adjustments as above		
Q	Turnover as declared in Annual Return (GSTR9)		
R	Un-Reconciled turnover (Q - P)		

<b>Pt. II</b>	<b>Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)</b>	
<b>6</b>	<b><u>Reasons for Un - Reconciled difference in Annual Gross Turnover</u></b>	
A	Reason 1	
B	Reason 2	
C	Reason 3	

13.06.2019
CA Sumit Jhunjunwala
44

<b>Pt. II</b>	<b>Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)</b>	
<b>7</b>	<b><u>Reconciliation of Taxable Turnover</u></b>	
A	Annual turnover after adjustments (from 5P above)	
B	Value of Exempted, Nil Rated, Non-GST supplies, <b>No-Supply turnover</b>	Sch III, Liquor, Petroleum, etc.
C	Zero rated supplies without payment of tax	Zero rated supplied under Bond/LUT
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)	
F	Taxable turnover as per liability declared in Annual Return (GSTR9)	
G	Unreconciled taxable turnover (F-E)	

13.06.2019 CA Sumit Jhunjhunwala 45

<b>Pt. II</b>	<b>Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)</b>	
<b>8</b>	<b><u>Reasons for Un - Reconciled difference in taxable turnover</u></b>	
A	Reason 1	
B	Reason 2	
C	Reason 3	

13.06.2019 CA Sumit Jhunjhunwala 46

<b>Pt. III</b>	<b>Reconciliation of tax paid</b>					
<b>9</b>	<b>Reconciliation of rate wise liability and amount payable thereon</b>					
			Tax Payable			
	Description	Taxable Value	CGST	SGST/UTGST	IGST	CESS
A	5%					
B	5% (RC)					
C	12%					
D	12% (RC)					
E	18%					
F	18% (RC)					
G	28%					
H	28% (RC)					

Whether Auditor to check classification?  
Whether to report here or in Part B – Certification?

13.06.2019 CA Sumit Jhunjunwala 47

	Description	Taxable Value	CGST	SGST/UTGST	IGST	CESS
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					
Q	Total amount paid as declared in Annual Return (GSTR9)					
R	Unreconciled payment of amount (PT1)					

13.06.2019 CA Sumit Jhunjunwala 48

<b>Pt. III</b>	<b>Reconciliation of tax paid</b>	
<b>10</b>	<b><u>Reasons for un-reconciled payment of amount</u></b>	
A	Reason 1	
B	Reason 2	
C	Reason 3	

<b>11</b>	<b><u>Additional amount payable but not paid (due to reasons specified under Tables 6,8 and 10 above)</u></b>					
			To be paid through Cash			
	Description	Taxable Value	CGST	SGST/UTGST	IGST	CESS
	5%					
	12%					
	18%					
	28%					
	3%					
	0.25%					
	0.10%					
	Interest					
	Late Fee					
	Penalty					
	Others (please specify)					



<b>Pt. IV</b>	<b>Reconciliation of Input Tax Credit (ITC)</b>		
<b>12</b>	<b>Reconciliation of Net Input Tax Credit (ITC)</b>		
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)		ITC availed (after reversals) as per the AFS shall be declared here. For Multiple GSTIN entity, internally derive GSTIN wise ITC
B	ITC booked in earlier Financial Years claimed in current Financial Year	(+)	ITC booked in the AFS of earlier F.Y. but availed in the ITC ledger in the current F.Y. (TRAN-1 to be reported here for 2017-18)
C	ITC booked in current Financial Year to be claimed in subsequent Financial Years	(-)	ITC booked in the AFS of current F.Y. but availed in the ITC ledger in the next F.Y.
D	ITC availed as per audited financial statements or books of account		<Auto>
E	ITC claimed in Annual Return (GSTR9)		As per Table 7J of GSTR-9 (Figures are Net of Reversal)
F	Un-reconciled ITC		

13.06.2019

CA Sumit Jhunjhunwala

51

<b>Pt. IV</b>	<b>Reconciliation of Input Tax Credit (ITC)</b>	
<b>13</b>	<b>Reasons for un-reconciled difference in ITC</b>	
A	Reason 1	
B	Reason 2	
C	Reason 3	

13.06.2019

CA Sumit Jhunjhunwala

52

	Description	Value	Amount of Total ITC	Amount of eligible ITC availed
	1	2	3	4
A	Purchases	<p>This table is for reconciliation of ITC declared in the Annual Return (GSTR9) against the expenses booked in the audited Annual Financial Statement or books of account. The various sub-heads specified under this table are general expenses in the audited Annual Financial Statement or books of account on which ITC may or may not be available. Further, this is only an indicative list of heads under which expenses are generally booked. Taxpayers may add or delete any of these heads but all heads of expenses on which GST has been paid / was payable are to be declared here.</p>		
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.)			

13.06.2019

CA Sumit Jhunjhunwala


53

	1	2	3	4
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			

13.06.2019


CA Sumit Jhunjhunwala

54



	1	2	3	4
R	Total amount of eligible ITC availed	Auto filled		
S	ITC claimed in Annual Return (GSTR9)	As per Table 7J of GSTR-9 (Figures are Net of Reversal)		
T	Un-reconciled ITC (ITC 2)			

13.06.2019 CA Sumit Jhunjhunwala 55



<b>Pt. IV</b>	<b>Reconciliation of Input Tax Credit (ITC)</b>	
<b>15</b>	<b><u>Reasons for un-reconciled difference in ITC</u></b>	
A	Reason 1	
B	Reason 2	
C	Reason 3	

13.06.2019 CA Sumit Jhunjhunwala 56

<b>16</b>	<b><u>Tax payable on un-reconciled difference in ITC (due to reasons specified in 13 and 15 above)</u></b>				
	Description	Amount Payable			
	Central Tax				
	State/UT Tax				
	Integrated Tax				
	Cess				
	Interest				
	Penalty				

13.06.2019

CA Sumit Jhunjhunwala

57

<b>Pt. V</b>	<b>Auditor's recommendation on additional Liability due to non-reconciliation</b>					
			To be paid through Cash			
	Description	Value	CGST	SGST/UTGST	IGST	CESS
	5%					
	12%					
	18%					
	28%					
	3%					
	0.25%					
	0.10%					
	Input Tax Credit					
	Interest					
	Late Fee					
	Penalty					

How to calculate interest?

Pt. V	Auditor's recommendation on additional Liability due to non-reconciliation					
			To be paid through Cash			
	Description	Value	CGST	SGST/UTGST	IGST	CESS
	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)					

13.06.2019

CA Sumit Jhunjhunwala

59

## Verification

I hereby **solemnly affirm** and declare that the information given herein above is **true and correct** to the best of my knowledge and belief and nothing has been concealed here from.

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

Place: .....  
 Name of the signatory .....  
 Membership No. ....  
 Date: .....  
 Full address .....

- Whether to check;
1. Place of Supply
  2. Nature of Supply
  3. Time of Supply
  4. Rate of tax
  5. Valuation
  6. ITC eligibility, etc.

### Verification of registered person:

I hereby solemnly affirm and declare that I am uploading the reconciliation statement in **FORM GSTR-9C prepared and duly signed by the Auditor** and nothing has been tampered or altered by me in the statement. I am also uploading other statements, as applicable, including financial statement, profit and loss account and balance sheet etc.

Signature

Place:

Date:

Name of Authorized Signatory

Designation/status

Audit provisions are also provided under other Statutes like The Income Tax Act, The Companies Act, The Societies Act, The Indian Trust Act, etc. therefore, in such cases, the Accounts for such entities would have been audited and financial accounts are drawn accordingly. However, some entities, may not have their accounts audited; being not covered by the statutory provisions or otherwise. Therefore, there are two situations are provided in the Form GSTR 9C. Moreover, it is quite possible that the GST Audit is carried out by the same Chartered Accountant who has conducted the audit under the other Statute.

- Where the accounts of the entity is audited by the same Chartered Accountant who is to undertake the GST Audit and
- Where the GST Audit undertaken by a Chartered Accountant other than the person who has carried out the audit of accounts of the entity.

The form has accordingly provided for two sets of certifications to cover both the situations discussed as above.

## PART – B- CERTIFICATION

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—

- balance sheet as on .....
- the \*profit and loss account/income and expenditure account for the period beginning from .....to ending on ....., and
- the cash flow statement for the period beginning from .....to 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:

.....

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 at .....and \*\* .....additional place of business within the State.

4. The documents required to be furnished under section 35 (5) of the CGST Act / SGST Act and Reconciliation Statement required to be furnished under section 44(2) of the CGST Act / SGST 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)

Place: .....

Name of the signatory .....

Membership No.....

Date: .....

Full address .....

**II. Certification in cases where the reconciliation statement (FORM 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 the .....Act, 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 from .....to ending on .....,
- (c) the cash flow statement for the period beginning from .....to 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.



3. The documents required to be furnished under section 35 (5) of the CGST Act / SGST Act and Reconciliation Statement required to be furnished under section 44(2) of the CGST Act / SGST 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 ..... ”.





**GMJ**

Information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of particular situation.

**CA Sumit Jhunjhunwala**

**GMJ & Co**

13.06.2019

CA Sumit Jhunjhunwala

67