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Monthly Newsletter Series
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# KNOWL with an EDGE



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## Section 50C applies to transfer of Tenancy

In the case of Kashmira Rajnikant Doshi Vs ITO, ITAT Mumbai has held that

The fact that the assessee was a tenant and not the owner of the premises does not, in view of the binding ratio of Vidarbha Veneer Industries Ltd. (supra), take the transaction outside the ambit of section 50C. We, therefore, hold that the provisions of section 50C are applicable to the transfer of tenancy rights in the present case.

We are concerned here with the interpretation placed by the Hon'ble jurisdictional High Court upon the expression occurring specifically in section 50C read with section 2(14). As a subordinate Tribunal, we are bound by the interpretation placed by the jurisdictional High Court on the very statutory provision which falls for our consideration. It is, therefore, not open to us to adopt a different interpretation merely on the basis of a textual distinction which has not found acceptance in the binding judgment of the Hon'ble jurisdictional High Court.

Once the jurisdictional High Court has subsequently interpreted the scope and ambit of section 50C in the context of the expression "capital asset, being land or building or both", the said interpretation is binding upon us. The earlier coordinate Bench decisions, to the extent they take a contrary view, therefore, cannot be followed by us.

www.itatonline.org

## Notice u/s 143(2) mandatory for carrying out assessment proceedings – Supreme Court

In the case of Principal Commissioner of Income Tax, Bhubaneshwar v/s. Orissa Mining Corporation Ltd., Hon'ble Supreme Court held that

No notice under Section 143(2) of the Act was admittedly issued. The excuse given by the Revenue is that such a notice was not required to be given and failure to give such a notice is not fatal to the reassessment proceedings.

Where the Revenue itself contends that no notice was sent, as required under the Act, the provision of Section 292BB will have no applicability.

The Assessing Officer cannot undertake the proceedings of reassessment under Section 143(3), read with Section 147 of the Act, unless a notice under Section 143(2) of the Act has been issued to the Assessee. Mere participation of the Assessee in the assessment proceedings, in the absence of a notice under Section 143(2) of the Act, does not confer jurisdiction on the Assessing Officer to frame an assessment under Section 143(3) of the Act.

A letter given by the Assessing Officer under section 142 (1) of the Act during the course of reassessment proceedings would not satisfy the requirements of a notice under section 143(2) of the Act. A notice under section 143(2) of the Act is a sine qua non for commencing the proceedings.

The revenue is not absolved of its obligation to serve a notice under Section 143(2) of the Act even if the Assessee requests that the earlier Return of Income filed under Section 139 of the Act be treated as the Return of Income filed in response to a notice under Section 148 of the Act.

https://www.supremecourtcases.com/principal-commissioner-of-income-tax-bhubaneshwar-v-orissa-mining-corporation-ltd

## CBDT tightens merger rules for charity trusts, imposes five-year curbs on changing objectives.

The Central Board of Direct Taxes (CBDT) has made it mandatory for organisations merging with another registered non-profit to inform the I-T Department within a prescribed deadline, get their accounts audited and disclose the reasons for the merger. The new rules, notified on October 30, also prevent organisations with regular registration from merging with those holding provisional registration, and vice versa.

Under the rules, the organisation that survives the merger cannot change its objectives for five years from the end of the financial year in which the merger takes place. The merger must not result in any direct or indirect benefit to specified related persons.

The tax department has made it clear that a merger

will not absolve the absorbed organisation of its financial or legal responsibilities. All its assets, liabilities and tax obligations will pass to the surviving organisation. This includes pending tax demands, assessments and other proceedings. If a tax demand is being challenged in an appeal, the surviving organisation will be liable to pay it if the appeal is dismissed.

Organisations will have to file a new Form 112A with the jurisdictional income tax authority within one month after the end of the month in which the merger takes effect. The filing must be made online using a digital signature or an electronic verification code.
Both organisations must get their accounts audited as on the date of the merger.

https://economictimes.indiatimes.com

**CBDT notifies Form 173A to claim exemption on interest, capital gains from government securities**

The Central Board of Direct Taxes (CBDT) has notified Form 173A under the Income-tax Rules, 2026, for taxpayers availing exemption on interest income and capital gains on government securities. Eligible taxpayers must disclose details of their assets, income received and securities bought or sold during the tax year in the new form.

The change has been notified through the Income-tax (Seventh Amendment) Rules, 2026, issued by the Ministry of Finance. The amended rules came into force on October 19, 2026.

It also calls for investor identification and registration details, along with security-level information such as the type of instrument, tenor and value of holdings.

The Income-tax (Seventh Amendment) Rules, 2026, will take effect from the date of publication in the Official Gazette, October 19, 2026. The notification was issued under Section 533, read with the relevant provisions of the Income-tax Act, 2025.

https://economictimes.indiatimes.com

**CBDT notifies Form 173A to claim exemption on interest, capital gains from government securities**

CBDT exempts TDS from any income in the nature of dividend paid by any unit of an International Financial Services Centre (IFSC), primarily engaged in the business of leasing of an aircraft (hereinafter referred to as the payer) to a company, being a Unit of an International Financial Services Centre (IFSC) primarily engaged in the business of leasing of an aircraft (hereinafter referred to as the payee) subject to the following, namely:

(1) The payee shall,—

(a) furnish a statement-cum-declaration in the Form No.1(N) annexed to this notification (hereinafter referred to as the said Form) to the payer giving details of the tax year in which the dividend income eligible for exemption under Schedule VI [Table: S.No. 11] of the said Act is payable; and

(b) such statement-cum-declaration shall be furnished and verified in the manner specified in the said Form for the tax year in which the dividend income eligible for exemption under Schedule VI [Table: S.No. 11] of the said Act is payable;

(2) The payer shall,—

(a) not deduct tax on payment made or credited to the recipient of such dividend (payee) after the date of receipt of copy of statement-cum-declaration in the said Form from payee; and

(b) furnish the particulars of all the payments made to the recipient of such dividend on which tax has not been deducted in view of this Notification in the statement of deduction of tax referred to in section 397(3)(b) of the said Act, read with the rule 219 of the Income-tax Rules, 2026

https://www.incometaxindia.gov.in/documents/d/guest/notification-no-141-2026-pdf

## E-Way Bill and Consolidated E-Way Bill Numbers to Get Longer from 1 January 2027

Because of the large volume of E-Way Bills generated, the current numbering capacity is expected to run out. The numbering formats will change from **1 January 2027**:

| Document | Current | Revised |
|---|---|---|
| E-Way Bill Number | 12 digits | 14 digits |
| Consolidated E-Way Bill Number | 10 digits | 11 digits |

- Taxpayers, GSPs, ERP and software providers, and API integrators must update their applications, APIs, database schemas and validation rules to handle the new formats.
- The changes will soon be released in the Sandbox environment for testing, and details will be published on the E-Way Bill Portal.
- Systems should be ready well before 1 January 2027 to avoid disruption.

## Changes in the GST Registration Amendment Process

Under **Notification No. 05/2026-Central Tax dated 26 October 2026**, the provisions of Rule 19 of the CGST Rules on amending registration have been substituted. The changes are now live on the GST portal.

- **Principal Place of Business:** amendments will still be examined by the Proper Officer.
- **All other amendments** (legal name, addition or removal of partners or directors, Additional Places of Business, and other REG-01 details) take effect automatically once the application is submitted and validated online.
- **OTP verification** of the mobile number and email of the Primary Authorised Signatory and one Promoter or Director is mandatory. It must be completed within **3 days** of submission, or no ARN will be generated.
- **PAN, DIN and CIN** are validated online, and the ARN is generated only after these checks pass.
- The amended Registration Certificate is issued on the portal once all verifications are complete.

## New Composition Category on the GST Portal

The portal has introduced changes for composition taxpayers. These apply to Forms REG-01, CMP-02, CMP-04 and REG-14.

- **New category added:** "Person eligible for composition levy under Section 10(2A)".
- **Option A** covers the existing Section 10(1) categories: manufacturers, restaurant service providers and other eligible suppliers. More than one can be selected.
- **Option B** is the new Section 10(2A) category. Only this one can be selected.
- Taxpayers can choose Option A or Option B, but not both.
- Composition taxpayers can now change their **category through REG-14**. The category must be the same across all GSTINs under the same PAN.

## Revised Process for Approving Registration Cancellation (Form GST REG-16)

Self-cancellation applications under Rule 20 of the CGST Rules will now go through system-based validations and can be approved electronically.

- **Returns check:** The application can be filed only if all returns due on or before the effective date of cancellation have been filed. If GSTR-1 or IFF has been filed for a period, GSTR-3B for that period must also be filed.
- **Pending for Returns Filing:** If returns up to the effective date are not yet due, the application waits at this stage. Those returns must be filed by their due dates.
- **Returns not filed on time:** The application is assigned to the jurisdictional officer.
- **Returns filed on time:**
  - > *Composition taxpayers, NRTPs, OIDAR suppliers and ISDs:* registration is cancelled electronically, with no officer involvement.

> *Composition taxpayers, NRTPs, OIDAR suppliers and ISDs:* registration is cancelled electronically, with no officer involvement.
> *Regular, casual and SEZ taxpayers with output tax liability of ₹2.5 lakh or less in every period:* registration is cancelled electronically.
> *Output tax liability above ₹2.5 lakh in any period:* GSTR-10 must be filed within 3 days. The **3 days** run from the due date of the pending returns, or from the date of the application if no returns were pending. If GSTR-10 is filed in time, registration is cancelled electronically. If not, the application goes to the officer.

- **Cancelled by the officer:** GSTR-10 must be filed within 90 days of the effective date of cancellation, as under the existing process.

## Simplified Registration Scheme for E-Commerce Sellers under Rule 14B

Under **Notification No. 05/2026-Central Tax dated 26 October 2026**, a new portal facility lets eligible suppliers selling goods through e-commerce operators (ECOs) that collect TCS obtain GST registration in a State or UT where they have no physical place of business. They do this by using the ECO's approved warehouse addresses as their Principal and Additional Places of Business.

### Eligibility

- The applicant must have no physical presence and no active regular registration in the State or UT where it is applying (Other Territory is excluded).
- Only one regular registration per PAN per State or UT is allowed under Rule 14B. Composition, ISD, SEZ and casual registrations are not covered.
- The applicant must hold at least one active regular GSTIN under the same PAN in another State (the "Home State GSTIN").
    - o This GSTIN must not be registered under Rule 14A or Rule 9A, or under State Code 97.
    - o A Rule 14A taxpayer can withdraw from that scheme and then apply under Rule 14B.
- The Home State GSTIN must not be facing Section 29 proceedings or have a pending cancellation application.
- Output tax liability on B2B supplies must not exceed **₹2.5 lakh per month** (CGST, SGST/UTGST and IGST combined).
- The registration can be used **only for supplies made through ECOs**.

### How to apply

1. Go to *Services → Registration → New Registration*. In Part B of REG-01, select "Yes" for Rule 14B and accept the declaration.
2. Enter the Home State GSTIN.
3. Enter the ECO's GSTIN. This sends an address access request to the ECO. The ECO's GSTIN must be active, in the same State, and have an active TCS registration there.
4. Once the ECO approves access, select its warehouse address(es) as the PPoB and/or APoB, then submit.

### ECO consent

- The ECO must give consent for the selected addresses within **7 working days** and provide details of its Authorised Representative in that State.
- No ARN is generated without consent for the PPoB.
- The ECO should not file amendments until the registration is granted. Before amending later, it must withdraw consent for the linked addresses.

### Aadhaar authentication

- If biometric Aadhaar authentication and document verification were already completed for the Home State GSTIN, the ARN is generated directly.

- If not, the Promoter or Partner and the Primary Authorised Signatory must complete it at a GST Seva Kendra.
  - The persons are selected through the Home State GSTIN login under *Services → Registration → Selection of Persons for Aadhaar Authentication under Rule 14B*.
- All verifications must be completed within **15 days** of submitting Part B, or no ARN is generated.

**Approval**

- A field visit is assigned unless one has already been done for the Home State GSTIN.
- The application is deemed approved once the field visit is completed or 30 days after the ARN is generated, whichever comes first. The certificate is then issued electronically.
- If rejected, an intimation is issued in REG-05A.
- A negative field visit report for the Home State GSTIN will auto-reject **all** pending Rule 14B applications in other States.
- Registrations under Rule 14B can be cancelled electronically under Rule 14B(24)(a)

**GST Notifications at a Glance | November 2026**

A notification-wise summary of the GST changes issued after the 57th GST Council meeting. Most take effect from 1 November 2026, with some provisions phased in up to April 2027.

**Central Tax notifications**

| Notification | Effective | Summary |
|---|---|---|
| 03/2026–CT | 1 Nov 2026 | Brings Sections 153 to 155 of the Finance Act, 2026 into force, amending Sections 15, 34 and 54 of the CGST Act. Post-sale discounts allowed through credit notes with ITC reversal by the recipient; provisional refunds extended to inverted duty claims; small export refunds freed from the minimum limit in Section 54(14). |
| 04/2026–CT | 1 Jan 2027 | Extends e-invoicing to specified reverse charge supplies and import of services. |
| 05/2026–CT | Phased from 1 Nov 2026 | Amends the CGST Rules. New Rule 14B lets eligible e-commerce sellers register in another State using an operator's warehouse. Some provisions start in December 2026, e-invoicing on inward reverse charge and service imports from 1 January 2027, and cancellation, credit-ledger and capital goods refund provisions from April 2027. |
| 06/2026–CT | 1 Nov 2026 | Withdraws the registration exemption under Notification 5/2017–CT for suppliers of used cooking oil, plastic, tyre and metal scrap, and e-waste. |
| 07/2026–CT | 1 Nov 2026 | Extends GST TDS under Section 51 to registered buyers purchasing these five categories from registered suppliers. |

**Central Tax (Rate) notifications**
Effective from 1 November 2026, unless the notification states otherwise.

| Notification | Summary |
|---|---|
| 02/2026–CT (R) | Retreaded tractor tyres (heading 4012) move to 5% GST. Qualifying seaweed-extract bio-stimulants included in the fertiliser entry. |
| 03/2026–CT (R) | Psyllium seeds (Isabgol, tariff item 1211 90 13) exempted. |
| 04/2026–CT (R) | Reverse charge on used cooking oil (1518), plastic scrap (3915), tyre scrap (4004) and e-waste (8549) supplied by unregistered persons to registered persons. |
| 05/2026–CT (R) | "Nominated Agency" now defined by reference to Appendix 4B of the DGFT Handbook of Procedures. |
| 06/2026–CT (R) | Hotels may claim ITC on accommodation bought from another hotel, capped at 2.5% CGST. EV passenger transport and rentals get a 5% (restricted ITC) or 18% option. Specified e-commerce delivery services taxed at 5% without ITC. |
| 07/2026–CT (R) | New exemptions for seat-share helicopter services (North-East and Bagdogra), Seamen's Provident Fund services, coffee curing for growers and specified toll-collection rights. Warehousing exemption restated; GTA services for e-commerce goods excluded from Entry 21A. |
| 08/2026–CT (R) | Entry 15 of Notification 13/2017–CT (R) (passenger vehicle renting under reverse charge): reference changed from 6 to 9. Not a simple rate increase. |
| 09/2026–CT (R) | Section 9(5) entry substituted: e-commerce operators pay tax on delivery services (other than postal and courier), unless the supplier is liable to register under Section 22(1). |
| 10/2026–CT (R) | Toll-Operate-Transfer concessionaires pay tax on O&M services as amounts are debited from the escrow account. |

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## RBI Expands Delegation of FEMA Compounding Powers to Regional Offices

The Reserve Bank of India (RBI), through A.P. (DIR Series) Circular No. 28/2026-27 dated 23 October 2026, has expanded the delegation of powers to its select Regional Offices for compounding certain contraventions under the Foreign Exchange Management Act, 1999 (FEMA). The measure aims to improve customer service and facilitate the resolution of FEMA contraventions by decentralising the processing of compounding applications that were previously handled at the RBI's Central Office.

The key changes are as follows:

### 1. Overseas Investment transactions

Compounding applications relating to contraventions under the earlier foreign securities regulations and the current Overseas Investment Rules and Regulations, 2022, will now be handled by designated Regional Offices. The appropriate office will be determined by the prefix of the Unique Identification Number (UIN) allotted to the overseas entity, joint venture or wholly owned subsidiary.

For cases where no UIN has been allotted, applications will continue to be submitted to the Cell for Effective Implementation of FEMA (CEFA) at the RBI's Central Office in Mumbai.

### 2. Borrowing, Lending and Guarantees

Compounding applications relating to contraventions under the applicable foreign currency and rupee borrowing/lending regulations, the Borrowing and Lending Regulations, 2018, and the Guarantees Regulations, including the 2026 Regulations, will now be submitted to the RBI Regional Office having jurisdiction over the registered office of the Indian applicant or its place of domicile, as applicable.

An important exception applies where the borrowing or guarantee relates to lending or guarantees provided by an applicant to an overseas entity in which it has made an overseas direct investment (ODI). Such applications must be submitted under the overseas investment procedure.

### 3. Contraventions involving multiple transaction categories

Where an application involves contraventions across multiple categories governed by different regulations and falling under the jurisdiction of different offices, it must be submitted to CEFA at the RBI's Central Office in Mumbai. This provides a centralised route for cases that span multiple regulatory categories.

### What Does This Mean for Businesses?

Businesses that have identified FEMA contraventions relating to overseas investments, external borrowings, intercompany loans or guarantees should reassess the appropriate filing route before submitting a compounding application. Correctly identifying the transaction category, the relevant UIN (where applicable), and the jurisdiction of the Regional Office will be important to avoid procedural delays.

**(RBI A.P. (DIR Series) Circular No. 28/2026-27 dated 23 October 2026)**

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## TRC Not Conclusive for Treaty Benefits, Holds Delhi ITAT

The Delhi Bench of the Income-tax Appellate Tribunal (ITAT), in Emerging India Focus Funds v. ACIT (IT(IT)A No. 148/Del/2026), examined the taxability of capital gains earned by a Mauritius tax resident on redemption of equity-oriented mutual fund units under the India–Mauritius Double Taxation Avoidance Agreement (DTAA).

The Tribunal held that equity-oriented mutual fund units are distinct from shares and that gains from their redemption are not covered by the treaty provision granting India taxation rights over gains from the alienation of shares. However, it also clarified that a Tax Residency Certificate (TRC), by itself, does not conclusively establish entitlement to treaty benefits. The matter was remanded for fresh examination of the taxpayer's commercial substance and treaty eligibility.

### Background

The taxpayer, a Mauritius tax resident, held a valid TRC, Global Business Licence (GBL) and SEBI registration as a Category I Foreign Portfolio Investor. It earned capital gains during FY 2022-23 on redemption of equity-oriented mutual fund units and claimed exemption under Article 13(4) of the India–Mauritius treaty.

The Revenue denied the exemption, arguing that mutual fund units should be treated at par with shares and questioning the taxpayer's commercial substance and control and management arrangements.

### Mutual Fund Units Are Distinct from Shares

The 2017 amendment to the India–Mauritius treaty introduced Article 13(3A), granting India taxation rights over gains arising from the alienation of shares in an Indian company acquired on or after 1 April 2017. Article 13(4) continues to govern other gains.

The Tribunal rejected the Revenue's contention that equity-oriented mutual fund units should be equated with shares merely because their underlying investments are predominantly in equities. It held that the treaty amendment specifically covered shares of Indian companies and did not extend to mutual fund units.

Accordingly, gains arising from redemption of such units fall under the residual Article 13(4), rather than Article 13(3A). This distinction is significant for foreign investors holding Indian mutual fund investments.

### TRC Does Not Automatically Establish Treaty Eligibility

Relying on the Supreme Court's decision in *AAR v. Tiger Global International II Holdings* [2026] 485 ITR 214 (SC), the Tribunal observed that a TRC is an eligibility condition but is not conclusive evidence of entitlement to treaty benefits.

At the same time, the Tribunal clarified that the burden lies on the Revenue to identify and establish the alleged treaty abuse. Factors such as shared office premises, absence of physical assets or limited employee-related expenditure cannot, independently, establish the absence of commercial substance.

### Commercial Substance and Governance Under Scrutiny

The Revenue questioned the taxpayer's commercial substance, particularly following the revocation of the GBL of its sole management shareholder in April 2022 and the appointment of a replacement only in April 2023.

The Tribunal found that the arrangements during this intervening period required further examination, particularly regarding who had the authority to make and approve investment and redemption decisions.

It therefore remanded the issues relating to treaty eligibility and the Limitation of Benefits (LoB) clause to the Assessing Officer for fresh adjudication, after providing the taxpayer an adequate opportunity to respond.

The ruling reinforces that treaty eligibility involves more than obtaining a TRC. While the Revenue must establish the alleged treaty abuse, foreign investors should be prepared to substantiate their commercial substance, effective management and governance arrangements.

For offshore funds investing in India, maintaining appropriate documentation of Board approvals, investment decisions, management arrangements and commercial activities is essential. The judgment also highlights the importance of examining the precise language of the applicable treaty rather than extending provisions by analogy.

***(Emerging India Focus Funds v. ACIT, IT(IT)A No. 148/Del/2026, Delhi ITAT.)***

## Gains from Indirect Transfer of Indian Assets not taxable under India–Ireland Tax Treaty rules Delhi ITAT

The Delhi Bench of the Income-tax Appellate Tribunal (ITAT), in FireEye Ireland Limited v. ACIT (IT(IT)A No. 1431/Del/2025), examined whether capital gains earned by an Irish tax resident from the transfer of shares in a US company, which held shares in an Indian subsidiary, were taxable in India under the India–Ireland Double Taxation Avoidance Agreement (DTAA).

The Tribunal held that the gains were not taxable in India under the Treaty. It ruled that domestic law provisions deeming certain offshore share transfers to be transfers of Indian assets cannot be read into the Treaty in the absence of corresponding treaty language. It also held that the Revenue could not invoke the Multilateral Instrument (MLI) anti-abuse provisions without establishing treaty abuse through specific enquiry or evidence.

### Background

The taxpayer, an Irish tax resident, transferred its ownership in various group entities to another Irish group company as part of an internal group restructuring. One of the entities transferred was a US company (USCo), which held shares in an Indian subsidiary.

The taxpayer claimed that the resulting capital gains were taxable only in Ireland under Article 13(6) of the Treaty. The Revenue, however, sought to tax the gains in India, contending that the transfer of USCo effectively resulted in an indirect transfer of shares of the Indian subsidiary, whose value was substantially derived from assets located in India.

### Tribunal's Ruling

**1. Treaty provisions govern the allocation of taxing rights**

Article 13(5) of the India–Ireland Treaty grants India taxation rights over gains arising from the alienation of shares in a company resident in India, subject to the provision's specified exclusions.

In the present case, the shares transferred were those of USCo, a US tax resident company, and not the Indian subsidiary. Accordingly, the Tribunal held that Article 13(5) did not apply. The gains fell within Article 13(6), the residuary provision, which allocates taxation rights to the country in which the alienator is resident—in this case, Ireland.

**2. Domestic indirect-transfer provisions cannot override the Treaty**

The Revenue relied on Explanation 5 to Section 9(1) of the Income-tax Act, 1961, which deems shares of a foreign company to be situated in India where their value is derived substantially from Indian assets.

The Tribunal rejected the attempt to import this domestic deeming fiction into the Treaty. It observed that the term “alienation” under the Treaty had to be interpreted in its ordinary meaning and that there was no ambiguity requiring recourse to the domestic law definition of “transfer” under Section 2(47).

Thus, a domestic law provision cannot unilaterally expand the scope of taxation rights allocated under a tax treaty.

**3. MLI anti-abuse provisions require evidence**

The Revenue also invoked Article 6 of the MLI, arguing that tax treaties should not facilitate double non-taxation or treaty abuse.

The Tribunal noted that the taxpayer had substantial business operations and employees in Ireland, and the transaction formed part of a broader global restructuring involving 17 entities. In the absence of specific enquiry or evidence establishing treaty abuse, the mere tax outcome of the transaction was insufficient to deny treaty benefits.

This ruling reinforces the importance of interpreting tax treaties on the basis of their actual language and the allocation of taxing rights agreed between the contracting states. Domestic anti-avoidance or deeming provisions cannot automatically be read into a treaty to create a tax liability that the treaty itself does not provide for.

It also highlights that the invocation of MLI anti-abuse provisions must be evidence-based. For businesses undertaking cross-border group restructurings, maintaining documentation demonstrating commercial rationale, business operations and the broader context of the restructuring remains important.

***(FireEye Ireland Limited v. ACIT, IT(IT)A No. 1431/Del/2025, Delhi ITAT.)***

**Relaxation of additional fees and extension of time for filing of Financial Statements and Annual Returns under the Companies Act, 2013 vide General Circular No. 05/2026 dated 24th October, 2026**

The Ministry of Corporate Affairs (MCA) has extended the last date for filing the Financial Statements and Annual Returns for the F.Y. 2025-2026 till 31st December, 2026 & 31st January, 2027 respectively without levy of the additional fees.

https://www.mca.gov.in/bin/dms/getdocument?mds=5vSiNq59rdjIZwZqMbEIgQ%253D%253D&type=open

**Relaxation of additional fees and extension of time for filing Form CRA-4 (Cost Audit Report in XBRL format) vide General Circular No. 06/2026 dated 27th October, 2026**

The Ministry of Corporate Affairs (MCA) has extended the last date for filing Form CRA-4 (Cost Audit Report in XBRL Format) for the F.Y. 2025-2026 till 31st December, 2026 without levy of the additional fees.

https://www.mca.gov.in/bin/dms/getdocument?mds=MdNq8TrolOXiNnioTLleTQ%253D%253D&type=open

# Compliance Calendar

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Due dates for the Month of December, 2026#

| Regulation | Due Date | Compliance | Description |
|---|---|---|---|
| Income Tax Act, 1961 | 7-Dec-26 | TDS/TCS Payment | Due date for deposit of tax deducted/collected for the month of November, 2026. |
| | 15-Dec-26 | Advance Tax | Third instalment of advance tax for the tax year 2026-27 |
| | 30-Dec-26 | Form 3CEAD | Report by a parent entity or an alternate reporting entity or any other constituent entity, resident in India, for the purposes of sub-section (2) or sub-section (4) of section 286 of the Income-tax Act, 1961 (assuming reporting accounting year is January 1, 2025 to December 31, 2025). |
| | 31-Dec-26 | Belated Income Tax Return | Filing of belated return of income for the assessment year 2026-27 for all assessee (provided assessment has not been completed on or before December 31, 2026) |
| Goods and Service Tax (GST) | 10-Dec-26 | GSTR 7 | Summary of Tax Deducted at Source (TDS) and deposited for the month of November 2026 |
| | 10-Dec-26 | GSTR 8 | Summary of Tax Collected at Source (TCS) and deposited by E-Commerce Operator for the month of November 2026 |
| | 11-Dec-26 | GSTR -1 | Return of outward supplies of taxable goods and/or services for the Month of November 2026 (for Assesses having turnover exceeding 1.5 Cr.) |
| | 13-Dec-26 | IFF-QRMP | Option of uploading Invoices for November 2026 using Invoice Furnishing Facility (IFF) applicable to tax payers opted for Quarterly Return Monthly Payment (QRMP) Scheme |
| | 13-Dec-26 | GSTR 6 | Return for Input Service Distributors for the month of November 2026 |
| | 20-Dec-26 | GSTR-3B | Simple GSTR return for the Month of November 2026 (based on category of taxpayer) |
| | 25-Dec-24 | Payment-QRMP | Registered persons under the QRMP Scheme s depositing the amount in Form GST PMT-06 |
| | 31-Dec-26 | GSTR-9 | Annual GST return to be filed by registered taxpayers having turnover above INR 2 Cr under the Goods and Services Tax (GST) for FY 2025-26 |
| | 31-Dec-26 | GSTR-9C | Annual GST reconciliation to be filed by registered taxpayers having turnover above INR 5 Cr under the Goods and Services Tax (GST) for FY 2025-26 |
| PT Act 1975 (Employee) | 15-Dec-26 | PT Employees | PT Payment for the month of Nov, 2026 |
| Employees' Provident Funds & Miscellaneous Provisions Act, 1952 | 15-Dec-26 | PF Payment | PF Payment for the month of Nov, 2026 |
| Employees' State Insurance Act, 1948 - (ESIC) | 15-Dec-26 | ESIC Payment | ESIC Payment for the month of Nov, 2026 |

# The above due date calender contains compliances generally applicable to taxpayers and this calender has been compiled by HSCo on basis of data available on various portals and other sources. One should always check applicable compliances based on their business needs and should also check updated due dates, if any, on the government portal before making the compliance.

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**8**
Partners

**100+**
Team Members

**5**
Offices across India

**1000+**
Clients

**15+**
Countries Served Globally

**SOC2 (Type II)**
Compliant

**ICAI Certified**
Peer Reviewed Firm

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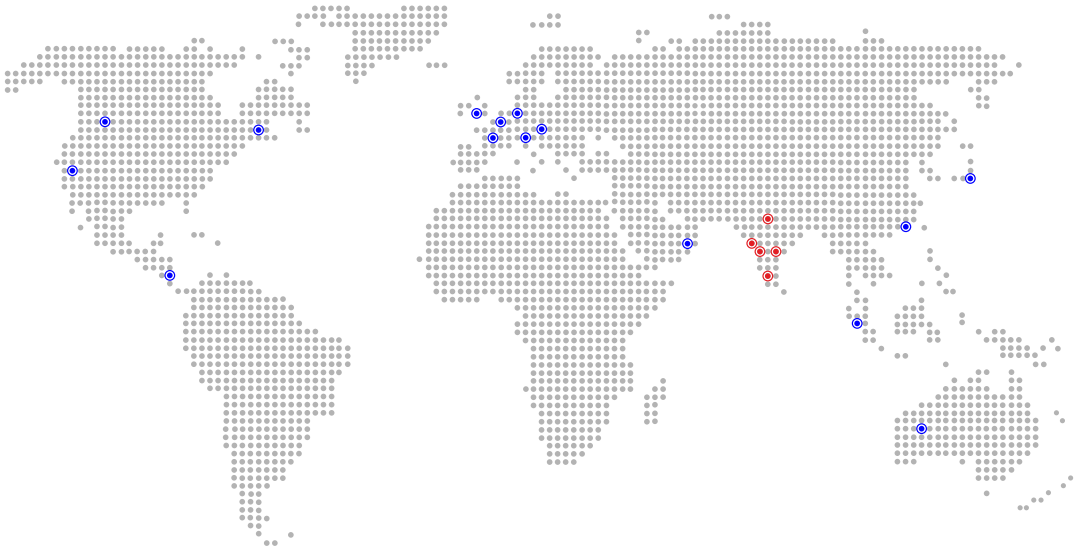
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