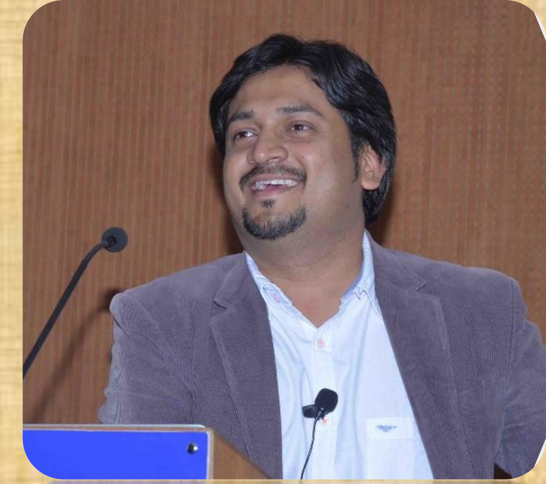
MASTER GUIDE ON

GST Annual Return and Audit

FORM GSTR 9 & FORM GSTR 9C



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HOW TO GO AHEAD WITH GST ANNUAL RETURN AND AUDIT

1. Appoint GST Auditor
2. Consolidation of GSTR 1 & GSTR 3B
3. Financial Statement to be divided GSTIN wise
4. Prepare and Fill GSTR 9
5. Prepare Reco of GSTR 9 and Financial Statement
6. Prepare and Fill GSTR 9C
7. File GSTR 9
8. Pay Tax liability observed by GST Auditor
9. File GSTR 9C

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Challenges

CHALLENGES:

- **Reconciliation:** No reconciliation done at all
- **Mistakes in return filed:** Messy status of data and return filed
- **No clarity on GST:** ITC, RCM, Valuation, Other incomes
- **Consolidated Financial Statement:** Preparing financial statement for each GSTIN. Also information is to be separated for April 17 to June 17 and July 17 to Mar 18
- **Defaulter Supplier:** Follow up with vendor for ITC
- **Excel Utility of GSTR 9 / 9C:** Not yet available
- **Alignment of GSTR 3B and GSTR 1:** First step required to be done
- **No new discovery can be made in GSTR FORM 9** :

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Important Provisions

IMPORTANT PROVISIONS:

Audit Means	Audit Required for	Annual Return Required for	Audit & Annual Return Regulation
Sec 2(13)	Sec 35(5)	Sec 44	Rule 80

IMPORTANT PROVISIONS:

- **Audit Means** [sec 2(13)] : “audit” means
  - The **Examination of records, returns and other documents** maintained or furnished by the registered person under this Act or the rules made thereunder or under any other law for the time being in force
  - To **verify the correctness** of **TURNOVER DECLARED**, **TAXES PAID**, **REFUND CLAIMED** and **INPUT TAX CREDIT AVAILED**, and
  - To assess his **compliance with the provisions** of this Act or the rules made thereunder

- **Audit Required for** [Sec 35(5)] :Every registered person whose turnover during a financial year exceeds the prescribed limit shall
  - **Get his accounts audited** by CA/CMA and
  - **Shall submit**
    - **Copy of the audited annual accounts**,
    - **The reconciliation statement under Sec 44(2)** and
    - **Such other documents** in such form and manner as may be prescribed

IMPORTANT PROVISIONS:

- **Annual Return Required - Non Audit Case** [Sec 44(1)] :
  - Every registered person,
  - other than ➔ Input Service Distributor, a person paying tax under Section 51 or Section 52, a casual taxable person and a non-resident taxable person,
  - Shall furnish an annual return for every financial year electronically in such form and manner as may be prescribed
  - on or before the 31st day of December following the end of such financial year

- **Annual Return Required - Audit Case** [Sec 44(2)] :
  - Every registered person who is required to get his accounts audited in accordance with the provisions of Sec 35(5)
  - Shall furnish, Electronically, the annual return under sub-section (1)
  - Along with 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.

IMPORTANT PROVISIONS:

- **Final Return Required - Registration Cancellation Case** [Sec 45] :
  - Every registered person who is required to furnish a return under Sec 39(1) and whose registration has been cancelled
  - Shall furnish a final return within 3 months of the date of cancellation or date of order of cancellation, whichever is later, in such form and manner as may be prescribed.

- **Final Return Required - Registration Cancellation Case** [Rule 81] :
  - Every registered person required to furnish a final return under section 45,
  - shall furnish such return electronically in **FORM GSTR-10** through the common portal either directly or through a Facilitation Centre notified by the Commissioner

    [Form GSTR 10 is notified vide Notf no. 21/2018-CT dt 18.04.2018]

IMPORTANT PROVISIONS:

- **Annual Return and Audit - Regulation [Rule 80] :**

1) Every registered person, **other than**

   - Input Service Distributor,
   - Person paying tax under section 51 or section 52,
   - Casual taxable person and
   - Non-resident taxable person,

   Shall furnish an annual return as specified under Sec 44(1) electronically in **FORM GSTR-9** through the common portal either directly or through a Facilitation Centre notified by the Commissioner:
   Provided that a person paying tax under section 10 shall furnish the annual return in **FORM GSTR-9A**.

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

IMPORTANT PROVISIONS:

- **Annual Return and Audit - Regulation [Rule 80] :**

3) Every registered person

   - whose **AGGREGATE TURNOVER** during a financial year **EXCEEDS RS 2 CRORE**
   - shall get his accounts audited as specified under Sec 35(5) and
   - He shall furnish a copy of audited annual accounts and a reconciliation statement, duly certified, in **FORM GSTR-9C,** electronically through the common portal either directly or through a Facilitation Centre notified by the Commissioner.

GSTR Form No	Inserted by Notification No	Notification Date
Form GSTR 9, Form GSTR 9A	39/2018-CT	4th Sep 2018
Form GSTR 9B	**Not yet notified**	**Not yet notified**
Form GSTR 9C	49/2018-CT	13th Sep 2018

SYNOPSIS:

- **ANNUAL RETURN**
  - **FORM GSTR 9**
    - Applicable to Normal Registered Taxpayer, Other than ISD, TDS/TCS, Casual Taxable Person
  - **FORM GSTR 9A**
    - Applicable to Composition Tax Payer
  - **Form GSTR 9B**
    - Applicable to GST TCS Tax Payer
- **GST AUDIT & RECONCILIATION STATEMENT**
  - **FORM GSTR 9C**
    - Applicable to taxpayer whose turnover during FY is more than Rs 2 Crore

IMPORTANT DEFINITION

- **Meaning of AGGREGATE TURNOVER - Sec 2(6):** It 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;

- **Meaning of EXEMPT SUPPLY - Sec 2(47):** It means

  - ✓ Supply of any goods/services which attracts nil rate of tax or
  - ✓ Which may be wholly exempt from tax under section 11, or under section 6 of the Integrated Goods and Services Tax Act, and
  - ✓ Includes non-taxable supply

IMPORTANT DEFINITION

AGGREGATE TURNOVER						
INCLUDES →	All Taxable Supply	Nil Rated Goods	Wholly Exempt Goods	Non Taxable Supply	Export	Inter State supply
OF PERSONS HAVING THE SAME PERMANENT ACCOUNT NUMBER, TO BE COMPUTED ON ALL INDIA BASIS						
EXCLUDES →	Central tax, State tax, Union territory tax, integrated tax and cess					

IMPORTANT PROVISIONS:

- **Annual Return and Audit - Levy of Late Fee [Sec 47] :**

GSTR Form No	Late fee under CGST + SGST	Maximum amount under CGST + SGST
Form GSTR 9,	Rs 100 + Rs 100 per day	0.25% + 0.25% of Turnover in State/UT
Form GSTR 9A	Rs 100 + Rs 100 per day	0.25% + 0.25% of Turnover in State/UT
Form GSTR 9B	Rs 100 + Rs 100 per day	0.25% + 0.25% of Turnover in State/UT
Form GSTR 9C	Rs 100 + Rs 100 per day	0.25% + 0.25% of Turnover in State/UT
Form GSTR 10	Rs 100 + Rs 100 per day	Rs 5000 + Rs 5000

Rs 400 per day and Max 1% of Turnover

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Internal Auditor can not become GST Auditor

ICAI ANNOUNCEMENT

Announcement

Sub. : Internal Auditor not to undertake Goods and Service Tax (GST) Audit simultaneously

We have received enquiries from the members at large and other stakeholders as to whether an internal auditor of an entity can also undertake GST Audit of the same entity as required under the Central Goods and Service Act, 2017.

The Council of the Institute, while considering the issue at its 378th Meeting held on 26th and 27th September, 2018, noted its earlier decision taken at its 281st Meeting held from 3rd to 5th October, 2008, that internal auditor of an assesee, whether working with the organization or independently practising Chartered Accountant being an individual chartered accountant or a firm of chartered accountants, cannot be appointed as his Tax auditor (under the Income Tax Act, 1961).

Upon consideration, the Council has decided that based on the conflict in roles as statutory and internal auditor simultaneously, the bar on internal auditor of an entity to accept tax audit (under Income Tax Act, 1961) will also be applicable to GST Audit (under the Central Goods and Service Act, 2017).

Accordingly, it is clarified that an Internal Auditor of an entity cannot undertake GST Audit of the same entity.

28.9.2018

BULLET POINT TO NOTE

BULLET POINT	COMMENT
Period Covered	1st July 17 to 31st Mar 18
Due date	31st Dec 18
Late Fee	Rs 400 per day for Form GSTR 9 + Form GSTR 9C Max 1% of Turnover for Form GSTR 9 + Form GSTR 9C
Notice for Non Filer	As per Sec 46 read with Rule 68, Notice in Form GSTR 3A shall be issued within 15 days electronically to registered person who fails to furnish return under Sec 44
Thresh hold limit	Form GSTR 9: Applicable irrespective of Turnover. **Applicable even in case of Nil Turnover** Form GSTR 9C: Applicable, if aggregate turnover is more than 2 Crore
PAN Vs GSTN	Reporting is GSTIN wise and not PAN Wise
Source of Information	Form GSTR 3B, Form GSTR 1 and Financial Statement

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Form GSTR 9 – For F.Y. 17-18

TOTAL 6 PARTS

TOTAL 19 Reporting Heading

DETAILS AS PER GSTR 1 AND GSTR 3B FILED

- **Details of taxable Outward and Inward Supply**
- **Details of outward supply on which tax is not payable**
- **Details of ITC availed**
- **Details of ITC Reversed**
- **Details of ITC as per GSTR 2A**
- **Details of Tax Paid**
- **Correction Done in April 18 to Sep 18 Return**
- **Other Information**

FORM GSTR 9 : FY 17-18

Part No	Heading of the Part of Form GSTR 9
I	**Basic Details (Sr. No. 1 to 3B)**
II	**Details of Outward and inward supplies declared during the financial year (Sr. No. 4 and 5)** ○ 4. Details of advances, inward and outward supplies on which **tax is payable** as declared in returns filed during the financial year ○ 5. Details of Outward supplies on which **tax is not payable** as declared in returns filed during the financial year
III	**Details of ITC as declared in returns filed during the financial year (Sr. No. 6 to 8)** ○ 6. Details of ITC availed as declared in returns filed during the financial year ○ 7. Details of ITC Reversed and Ineligible ITC as declared in returns filed during the financial year ○ 8. Other ITC related information (Comparison with GSTR 2A)
IV	**Details of tax paid as declared in returns filed during the financial year (Sr. No. 9)**

FORM GSTR 9 : FY 17-18

Part No	Heading of the Part of Form GSTR 9
V	**Particulars of the transactions for the previous FY declared in returns of April to September of current FY or upto date of filing of annual return of previous FY whichever is earlier (Sr. No. 10 to 14)**
VI	**Other Information (Sr. No 15 to 19)** ○ 15. Particulars of Demands and Refunds ○ 16. Information on supplies received from composition taxpayers, deemed supply under section 143 and goods sent on approval basis ○ 17. HSN Wise Summary of outward supplies ○ 18. HSN Wise Summary of Inward supplies ○ 19. Late fee payable and paid

FORM GSTR 9 : FY 17-18

✓ **Information Required in Annual Return for**

PERIOD	YES / NO
April 17 to June 17	**NO**
July 17 to Mar 18	YES
April 18 to Sep 18	**YES (Only in Part V of Form GSTR 9) with respect to Correction of Current Financial Year**

FORM GSTR 9 : FY 17-18: Part I & II

- ✓ This form doesn't require certification.
- ✓ Additional Tax can not be paid along with this form
- ✓ Information of July 17 to Mar 18 to be reported in this form, except Part V. No information of April 17 to June 17 is to be provided in this report.

"FORM GSTR-9 (See rule 80) Annual Return						
Pt. I	**Basic Details**					
1	Financial Year					
2	GSTIN					
3A	Legal Name					
3B	Trade Name (if any)					
Pt. II	**Details of Outward and inward supplies declared during the financial year**					
			(Amount in ₹ in all tables)			
	Nature of Supplies	Taxable Value	CGST	SGST	IGST	Cess
	1	2	3	4	5	6
4	**Details of advances, inward and outward supplies on which tax is payable as declared in returns filed during the financial year**					

FORM GSTR 9 : FY 17-18: Part II

S.N	HAEADING	COMMENT
4	**Details of advances, inward and outward supplies on which tax is payable as declared in returns filed during the financial year**	▪ Only Tax Payable supplies/receipts to be mentioned under this Para
A	Supplies made to un-registered persons (B2C)	▪ Reported from Table 5 (Large B 2 C category : POS is in different State & Value more than Rs 2.5 lakhs), Table 7 (B 2 C Small category), Table 9 (Amendment of Table 5), Table 10 of GSTR 1 (Amendment of Table 7) ▪ Net of Debit / credit note to be reported
B	Supplies made to registered persons (B2B)	▪ Reported from Table 4A (B2B) and Table 4C (Supply through E-commerce) of GSTR 1 ▪ Debit / credit note to be reported separately ▪ Doesn't include supplies on which tax is payable under RCM
C	Zero rated supply (Export) on payment of tax (except supplies to SEZs)	▪ Reported from Table 6A of GSTR 1 ▪ Export under LUT is not to be reported here. ▪ SEZ supply is not to be reported here ▪ Debit / credit note to be reported separately
D	Supply to SEZs on payment of tax	▪ Reported from Table 6B of GSTR 1 ▪ Supply to SEZ under LUT is not to be reported here ▪ Debit / credit note to be reported separately

FORM GSTR 9 : FY 17-18: Part II

S.N	HAEADING	COMMENT
E	Deemed Exports	▪ Reported from Table 6C of GSTR 1 (Notification No 48/2017 CT Supply against Adv Authorisation, EPCG etc) ▪ Debit / credit note to be reported separately
F	Advances on which tax has been paid but invoice has not been issued (not covered under (A) to (E) above)	▪ Here, case of advance received but invoice not issued during July 17 to Mar 18 are to be reported. ▪ Reported from Table 11A of GSTR 1 ▪ Advance against goods was taxable upto 15.11.17 (Notification No 66/2017 CT)
G	Inward supplies on which tax is to be paid on reverse charge basis	▪ As Recipient - Cases where Sec 9(3), 9(4) is applicable to be reported.(It doesn't include Import of Goods). ▪ Reported from Table 3.1(d) of Form GSTR 3B ▪ Including Advances, ▪ Net of Debit / credit note to be reported
H	Sub-total (A to G above)	

FORM GSTR 9 : FY 17-18: Part II

S.N	HAEADING	COMMENT
I	Credit Notes issued in respect of transactions specified in (B) to (E) above (-)	▪ Reported from Table 9B of GSTR 1. ▪ Details of Credit note of B2C is to be mentioned in Para 4A above
J	Debit Notes issued in respect of transactions specified in (B) to (E) above (+)	▪ Reported from Table 9B of GSTR 1. ▪ Details of Debit note of B2C is to be mentioned in Para 4A above
K	Supplies / tax declared through Amendments (+)	▪ Details of amendment made to above Para 4B, Para 4C, Para 4D, Para 4E, Para 4I, Para 4J to be reported here. ▪ Reported from Table 9A and Table 9C of GSTR 1
L	Supplies / tax reduced through Amendments (-)	▪ Details of amendment made to above Para 4B, Para 4C, Para 4D, Para 4E, Para 4I, Para 4J to be reported here. ▪ Reported from Table 9A and Table 9C of GSTR 1
M	Sub-total (I to L above)	
N	Supplies and advances on which tax is to be paid (H + M) above **Referred in Audit Report**	

FORM GSTR 9 : FY 17-18: Part II

S.N	HAEADING	COMMENT
5	**Details of Outward supplies on which tax is not payable as declared in returns filed during the financial year**	▪ supplies on which tax is not payable, are to be mentioned under this Para
A	Zero rated supply (Export) without payment of tax	▪ Reported from Table 6A of GSTR 1 ▪ Export under LUT is to be reported here. ▪ SEZ supply is not to be reported here
B	Supply to SEZs without payment of tax	▪ Reported from Table 6B of GSTR 1 ▪ Supplies under LUT is to be reported here.
C	Supplies on which tax is to be paid by the recipient on reverse charge basis	▪ As Supplier - Cases where Sec 9(3), 9(4) is applicable to be reported.(It doesn't include Import of Goods). Reported from Table 4B of Form GSTR1 ▪ Debit / credit note to be reported separately
D	Exempted	▪ Reported from Table 8 of Form GSTR 1
E	Nil Rated	▪ Reported from Table 8 of Form GSTR 1
F	Non-GST supply	▪ Reported from Table 8 of Form GSTR 1. ▪ "No Supply" category is also be covered here. (This is as per instruction to GSTR 9)
G	Sub-total (A to F above)	

FORM GSTR 9 : FY 17-18: Part II

S.N	HAEADING	COMMENT
H	Credit Notes issued in respect of transactions specified in A to F above (-)	▪ Reported from Table 9B of Form GSTR 1
I	Debit Notes issued in respect of transactions specified in A to F above (+)	▪ Reported from Table 9B of Form GSTR 1
J	Supplies declared through Amendments (+)	▪ Reported from Table 9A & Table 9C of Form GSTR 1
K	Supplies reduced through Amendments (-)	▪ Reported from Table 9A & Table 9C of Form GSTR 1
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) Referred in Audit Report	▪ This will include all taxable , Non taxable outward supplies. ▪ This will include advances on which tax is paid but invoice is not issued during the year. ▪ This will not include inward supplies on which tax paid under RCM

FORM GSTR 9 : FY 17-18: Part III

- ✓ In Part III, only tax amount is required to be mentioned. Value of supplies is not required to be mentioned.
- ✓ Information in Sr. No. A below are going to be auto populated
- ✓ In this part, at some para’s, bifurcation of information is required to be given
  - o Between Inputs, Capital Goods and Input Services at Sr. No. 6B to 6D and
  - o Between Inputs and Capital Goods at Sr. No. 6E

Pt. III	Details of ITC as declared in returns filed during the financial year					
	Description	Type	CGST	SGST	IGST	Cess
	1	2	3	4	5	6
6	**Details of ITC availed as declared in returns filed during the financial year**					
A	Total amount of input tax credit availed through FORM GSTR-3B (sum total of Table 4A of FORM GSTR-3B)		<Auto>	<Auto>	<Auto>	<Auto>
B	Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)	Inputs				
		Capital Goods				
		Input Services				

FORM GSTR 9 : FY 17-18: Part III

S.N	HAEADING	COMMENT
B	Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)	▪ Table 4(A)(5) of GSTR 3B can be used for filing up these details ▪ Credit availed, but reversed (may be due to time limit of 180 days for making payment to supplier) and then re-claimed (after making payment to supplier) shall not be reported here. It is to be reported in below Para 6(H)
C	Inward supplies received from unregistered persons liable to reverse charge (other than B above) on which tax is paid & ITC availed	▪ Table 4(A)(3) of GSTR 3B can be used for filing up these details. ▪ Credit of tax paid as per Sec 9(4) is to be considered here ▪ It doesn't include import of service
D	Inward supplies received from registered persons liable to reverse charge (other than B above) on which tax is paid and ITC availed	▪ Table 4(A)(3) of GSTR 3B can be used for filing up these details. ▪ Credit of tax paid as per Sec 9(3) is to be considered here
E	Import of goods (including supplies from SEZs)	▪ Table 4(A)(1) of GSTR 3B can be used for filing up these details.
F	Import of services (excluding inward supplies from SEZs)	▪ Table 4(A)(2) of GSTR 3B can be used for filing up these details.
G	Input Tax credit received from ISD	▪ Table 4(A)(4) of GSTR 3B can be used for filing up these details.

FORM GSTR 9 : FY 17-18: Part III

S.N	HAEADING	COMMENT
H	Amount of ITC reclaimed (other than B above) under the provisions of the Act	▪ Amount of ITC claimed, reversed and reclaimed is to be reported here
I	Sub-total (B to H above)	
J	Difference (I - A above)	▪ Ideally, this amount should be Zero. Figures as per para 6B to 6H are just detailed versions of amount mentioned in Para 6A above
K	Transition Credit through TRAN-I (including revisions if any)	
L	Transition Credit through TRAN-II	
M	Any other ITC availed but not specified above	▪ For example : Details of ITC availed through ITC 01, ITC 02 to be reported here
N	Sub-total (K to M above)	
O	Total ITC availed (I + N above)	
7	**Details of ITC Reversed and Ineligible ITC as declared in returns filed during the financial year**	
A	As per Rule 37	▪ Table 4B of GSTR 3B may be used for reporting this. ▪ Case of payment not made within 180 days

FORM GSTR 9 : FY 17-18: Part III

S.N	HAEADING	COMMENT
B	As per Rule 39	▪ Table 4B of GSTR 3B may be used for reporting this. ▪ Reversal of excess ITC distributed credit by ISD as per Rule 39(1)(j), 39(2)
C	As per Rule 42	▪ Table 4B of GSTR 3B may be used for reporting this. ▪ Reversal of ITC of Input/Input Services, if used for exempted supply
D	As per Rule 43	▪ Table 4B of GSTR 3B may be used for reporting this. ▪ Reversal of ITC of CG, if used for exempted supply
E	**As per section 17(5)**	▪ Table 4B of GSTR 3B may be used for reporting this. Reversal of block ITC
F	Reversal of TRAN-I credit	▪ Table 4B of GSTR 3B may be used for reporting this
G	Reversal of TRAN-II credit	
H	Other reversals (pl. specify)	▪ ITC reversed through ITC 03, Sale of CG, Reversal due to closure of business or any other reversal may be reported here
I	Total ITC Reversed (A to H above)	
J	Net ITC Available for Utilization (6O - 7I)	**Referred in Audit Report**
8	**Other ITC related information**	
A	ITC as per GSTR-2A (Table 3 & 5 thereof)	This will be auto populated by system from GSTR 2A
B	ITC as per sum total of 6(B) and 6(H) above	It will be auto populated. (In form notified by govt, auto comment is mentioned only for IGST, and not for other. It might be typing mistake.)

FORM GSTR 9 : FY 17-18: Part III

S.N	HAEADING	COMMENT
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 but availed during April to September, 2018	Credit pertaining to July 17 to Mar 18, but availed in GSTR 3B of April 18 to Sep 18, shall be declared here. Table 4(A)(5) of Form GSTR 3B may be used for filling up these details
D	**Difference [A-(B+C)]**	
E	ITC available but not availed (out of D)	Amount of Para 8E + 8F = 8D
F	ITC available but ineligible (out of D)	
G	IGST **paid** on import of goods (including supplies from SEZ)	
H	IGST credit **availed** on import of goods (as per 6(E) above)	This will be auto populated by system from para 6E above
I	Difference (G-H)	
J	ITC available but not availed on import of goods (Equal to I)	This should be equal to Para 8I above. This is credit not availed and ineligible credit. Unnecessary this extra row is there.
K	Total ITC to be lapsed in current financial year (E + F + J)	This is lapsed credit

FORM GSTR 9 : FY 17-18: Part IV & V

- ✓ **IGST/CGST/SGST/Cess Tax liability Paid:** Reported from Table 6.1 of GSTR 3B. Here details of actual tax paid during current FY as per GSTR 3B is required to be given. Even if there is difference as per GSTR 3B and GSTR 1, here details as per GSTR 3B are to be given.

- ✓ **Interest:** Actual Interest paid as disclosed only to be shown here.

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			
				CGST	SGST	IGST	Cess
	1	2	3	4	5	6	7
	Integrated Tax						
	Central Tax						
	State/UT Tax						
	Cess						
	Interest						
	Late fee						
	Penalty						
	Other						

Referred in Audit Report

Pt. V	Particulars of the transactions for the previous FY declared in returns of April to September of current FY or upto date of filing of annual return of previous FY whichever is earlier					
	Description	Taxable Value	CGST	SGST	IGST	Cess
	1	2	3	4	5	6

FORM GSTR 9 : FY 17-18: Part V

S.N	HAEADING		COMMENT
10	Supplies / tax declared through Amendments (+) (net of debit notes)	Referred in Audit Report	Amendment done in April 18 to Sep 18 GSTR 1/Debit or Credit notes issued w.r.t supplies declared in GSTR 1 of July 17 to Mar 18, should be reported here. Table 9A, Table 9B, Table 9C of GSTR 1 of April 18 to Sep 18 may be used for filling these details
11	Supplies / tax reduced through Amendments (-) (net of credit notes)		
12	Reversal of ITC availed during previous financial year		Reversal of ITC / availment of ITC in April 18 to Sep 18 GSTR 3B, w.r.t ITC availed in July 17 to Mar 18/Document of July 17 to Mar 18, shall be reported here. Table 4(B) of GSTR 3B of April 18 to Sep 18 may be used for filling these details
13	ITC availed for the previous financial year		

14	Differential tax paid on account of declaration in 10 & 11 above		
	Description	Payable	Paid
	1	2	3
	Integrated Tax		
	Central Tax		
	State/UT Tax		
	Cess		
	Interest		

FORM GSTR 9 : FY 17-18: Part VI

Pt. VI	Other Information							
15	Particulars of Demands and Refunds							
	Details	CGST	SGST	IGST	Cess	Interest	Penalty	Late Fee
	1	2	3	4	5			
A	Total Refund claimed							
B	Total Refund sanctioned							
C	Total Refund Rejected							
D	Total Refund Pending							
E	Total demand of taxes							
F	Total taxes paid in respect of E above							
G	Total demands pending out of E above							

FORM GSTR 9 : FY 17-18: Part VI

16	Information on supplies received from composition taxpayers, deemed supply under section 143 and goods sent on approval basis					
	Details	Taxable Value	CGST	SGST	IGST	Cess
	1	**COMMENT**				
A	Supplies received from Composition taxpayers	▪ Table 5 of Form GSTR 3B may be used for filling up these details. Only Taxable value is to be reported				
B	Deemed supply under Section 143	▪ Deemed supplies from principal to job worker shall be declared here				
C	Goods sent on approval basis but not returned	▪ Goods sent on approval but not returned within 180 days shall be declared here				

FORM GSTR 9 : FY 17-18: Part VI

- ✓ **Sr. No 17 and 18:** It is optional for tax payer having turnover upto 1.5 crore. It is mandatory to report 2 digit level HSN Code for taxpayer having turnover in between 1.5 to 5 crore. It is mandatory to report 4 digit level HSN Code for taxpayer having turnover in more than 5 crore. UQC is to be reported only in case of goods

17	HSN Wise Summary of outward supplies							
HSN Code	UQC	Total Quantity	Taxable Value	Rate of Tax	Central Tax	SGST	IGST	Cess

18	HSN Wise Summary of Inward supplies							
HSN Code	UQC	Total Quantity	Taxable Value	Rate of Tax	CGST	SGST	IGST	Cess

19	Late fee payable and paid		
	Description	Payable	Paid
	1	2	3
A	Central Tax		
B	State Tax		

FORM GSTR 9 : FY 17-18: Verification

✓ **No place to mention remark/reservation in Form GSTR 9**

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 there from and in case of any reduction in output tax liability the benefit thereof has been/will be passed on to the recipient of supply.

Signature

Place

Name of Authorised Signatory

Date

Designation / Status

???

Form GSTR 9C – For F.Y. 17-18

TOTAL V PARTS

TOTAL 16 Reporting Heading

Reconciliation of Audited Financial Statement with GSTR 9

- Reconciliation of Gross Turnover
- Reconciliation of Taxable Turnover
- Reconciliation of Rate Wise Liability and Amount Payable thereon
- Additional Amount Payable due to above reconciliation but not paid
- Reconciliation of Net ITC
- Auditors Recommendation on additional Tax Liability
- Verification
- Audit Certification Report

FORM GSTR 9C : FY 17-18

Part No	Heading of the Part of Form GSTR 9C
PART – A - Reconciliation Statement	
I	**Basic Details (Sr. No. 1 to 4)**
II	**Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return GSTR9 (Sr. No 5 to 8)** ○ 5. Reconciliation of Gross Turnover ○ 6. Reasons for Un - Reconciled difference in Annual Gross Turnover ○ 7. Reconciliation of Taxable Turnover ○ 8. Reasons for Un - Reconciled difference in taxable turnover
III	**Reconciliation of tax paid (Sr. No. 9 to 11)** ○ 9. Reconciliation of rate wise liability and amount payable thereon ○ 10. Reasons for un-reconciled payment of amount ○ 11. Additional amount payable but not paid (due to reasons specified under Tables 6,8 and 10 above)

FORM GSTR 9C : FY 17-18

Part No	Heading of the Part of Form GSTR 9C
IV	**Reconciliation of Input Tax Credit (ITC) (Sr. No. 12 to 16)** ○ 12. Reconciliation of Net Input Tax Credit (ITC) ○ 13. Reasons for un-reconciled difference in ITC ○ 14. Reconciliation of ITC declared in Annual Return (GSTR9) with ITC availed on expenses as per audited Annual Financial Statement or books of account ○ 15. Reasons for un - reconciled difference in ITC ○ 16. Tax payable on un-reconciled difference in ITC (due to reasons specified in 13 and 15 above)
V	**Auditor's recommendation on additional Liability due to non-reconciliation**
PART – B- CERTIFICATION	

FORM GSTR 9C : FY 17-18

- ✓ **Information Required in Annual Return for**

PERIOD	YES / NO
April 17 to June 17	**YES**
July 17 to Mar 18	YES
April 18 to Sep 18	**NO**

- ✓ In Form GSTR 9C, information of turnover of April 17 to June 17 is required to be given. Said details are also required to furnish in first GSTR 1 of F.Y. 17-18. Cross checking of said information with GSTR 1 is to be done.

FORM GSTR 9C : FY 17-18: PART I

"FORM GSTR-9C

See rule 80(3)

PART – A - Reconciliation Statement

Pt. I	Basic Details	
1	Financial Year	
2	GSTIN	
3A	Legal Name	< Auto>
3B	Trade Name (if any)	<Auto>
4	Are you liable to audit under any Act?	<<Please specify>>
		(Amount in ₹ in all tables)

COMMENT:

- Information of whole F.Y. 17-18 is required to be given in this form
- Financial Statements are to be divided
  - Into GSTIN wise, and
  - April 17 to June 17 and July 17 to Mar 18
- Particulars of audit under other Acts (Companies Act 2013, Income Tax Act 1961, MVAT Act 2002 etc)

FORM GSTR 9C : FY 17-18: PART II

Pt. II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)	
5	**Reconciliation of Gross Turnover**	
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)	
B	Unbilled revenue at the beginning of Financial Year	(+)
C	Unadjusted advances at the end of the Financial Year	(+)
D	Deemed Supply under Schedule I	(+)
E	Credit Notes issued after the end of the financial year but reflected in the annual return	(+)
F	Trade Discounts accounted for in the audited Annual Financial Statement but are not permissible under GST	(+)

COMMENT:

- **PARA 5A:**
  - There may be cases where multiple GSTINs (State-wise) registrations exist on the same PAN. This is common for persons / entities with presence over multiple States. Such persons / entities, will have to **internally derive their GSTIN wise turnover and declare the same here**.
  - It may be noted that reference to audited Annual Financial Statement **includes reference to books** of accounts in case of persons / entities having presence over multiple States
  - It include supply of goods and services , other income which is supply under GST.

- **PARA 5B:** It means, revenue booked in last F.Y. on accrual basis (WIP etc), However invoice for the same is raised in F.Y. 17-18 and GST is charged on the same.
- **PARA 5C:** It means, advance on which GST is paid in FY 17-18 but invoice for the same is not raised in FY 17-18
- **PARA 5D:** It include adjustment on account of Schedule I Supply reported in GSTR 1, mainly: - Branch Transfer, Capital Goods transferred to under GSTIN unit etc
- **PARA 5E:** As per me, this para is not relevant and incorrect.
- **PARA 5F:** Trade discounts which are accounted for in the audited Annual Financial Statement but on which GST was leviable(being not permissible) shall be declared here

FORM GSTR 9C : FY 17-18: PART II

Pt. II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)	
G	Turnover from April 2017 to June 2017	(-)
H	Unbilled revenue at the end of Financial Year	(-)
I	Unadjusted Advances at the beginning of the Financial Year	(-)
J	Credit notes accounted for in the audited Annual Financial Statement but are not permissible under GST	(-)
K	Adjustments on account of supply of goods by SEZ units to DTA Units	(-)
L	Turnover for the period under composition scheme	(-)
M	Adjustments in turnover under section 15 and rules thereunder	(+/-)
N	Adjustments in turnover due to foreign exchange fluctuations	(+/-)

COMMENT:

- **PARA 5G:** Turnover of F.Y. 17-18 are to be reported here.
- **PARA 5H:** Unbilled revenue (WIP) recorded on accrual basis in current FY but GST is not payable not the same. (Tax invoice is also not raised in FY 17-18 and will be raised in next FY)
- **PARA 5I:** Value of all advances for which GST has not been paid but the same has been recognized as revenue in the audited Annual Financial Statement shall be declared here
- **PARA 5J:** Value of credit notes which have been accounted for in Financial Statement but were not admissible under Section 34 of the CGST Act shall be declared here
- **PARA 5K:** Value of goods supplied by SEZs to DTA for which the DTA units have filed bill of entry shall be declared here.
- **PARA 5L:** There may be cases where registered persons might have opted out of the composition scheme during the current financial year and its turnover as per the audited Financial Statement would include both turnover, as composition taxpayer as well as normal taxpayer. Therefore, turnover for which GST was paid under composition scheme shall be declared here.
- **PARA 5M:** Reporting under this para will be required when here the taxable value and the invoice value differ due to valuation principles under section 15

FORM GSTR 9C : FY 17-18: PART II

Pt. II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)		
O	Adjustments in turnover due to reasons not listed above	(+/-)	
P	Annual turnover after adjustments as above		<Auto>
Q	Turnover as declared in Annual Return (GSTR9)		
R	Un-Reconciled turnover (Q - P)		AT1
6	**Reasons for Un - Reconciled difference in Annual Gross Turnover**		
A	Reason 1	<<Text>>	
B	Reason 2	<<Text>>	
C	Reason 3	<<Text>>	

COMMENT:

- **PARA 5O:** Residuary general para for reporting difference on some account. **Example:** Notice pay recovery, Sale of capital goods, Inputs and Capital Goods sent to job worker but not returned within the prescribed period, Incentive/rebate received from supplier
- **PARA 5P:** This amount will be auto reflected.
- **PARA 5Q:** This turnover may be derived from Sr. No. 5N, 10 and 11 of Form GSTR 9
- **PARA 5R and 6:** Reasons for non-reconciliation between the annual turnover declared in the audited Annual Financial Statement and turnover as declared in the Annual Return (GSTR 9) shall be specified here. Any liability arising therefrom must be disclosed at Table No.11 (Additional amount payable but not paid) & Part V as auditor’s recommendation.

FORM GSTR 9C : FY 17-18: PART II

Pt. II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)	
7	**Reconciliation of Taxable Turnover**	
A	Annual turnover after adjustments (from 5P above)	<Auto >
B	Value of Exempted, Nil Rated, Non-GST supplies, No-Supply turnover	
C	Zero rated supplies without payment of tax	
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)	<Auto>
F	Taxable turnover as per liability declared in Annual Return (GSTR9)	
G	Unreconciled taxable turnover (F-E)	AT 2
8	**Reasons for Un – Reconciled difference in taxable turnover**	
A	Reason 1	<<Text>>

COMMENT:

- **PARA 7A:** It will be auto reflected
- **PARA 7B:** Amount net of Debit Note/ Credit Note to be reflected here.
- **PARA 7C:** Amount net of Debit Note/ Credit Note to be reflected here. SEZ Supplies under LUT are also be to be reflected here.
- **PARA 7D:** Amount net of Debit Note/ Credit Note to be reflected here.
- **PARA 7E:** It will be auto reflected
- **PARA 7F:** This turnover may be derived from Sr. No. 4N of Form GSTR 9
- **PARA 7G and 8:** Reasons for non-reconciliation between adjusted annual taxable turnover as derived from Table 7E above and the taxable turnover declared in Table 7F shall be specified here.

FORM GSTR 9C : FY 17-18: PART III

Pt. III	Reconciliation of tax paid					
9	Reconciliation of rate wise liability and amount payable thereon					
			Tax payable			
	Description	Taxable Value	Central tax	State tax / UT tax	Integrated Tax	Cess, if applicable
	1	2	3	4	5	6
A	5%					
B	5% (RC)					
C	12%					
D	12% (RC)					
E	18%					
F	18% (RC)					
L	Interest					
M	Late Fee					
N	Penalty					
O	Others					
P	Total amount to be paid as per tables above		<Auto>	<Auto>	<Auto>	<Auto>
Q	Total amount paid as declared in Annual Return (GSTR 9)					
R	Un-reconciled payment of amount			PT 1		
10	Reasons for un-reconciled payment of amount					
A	Reason 1	<<Text>>				
B	Reason 2	<<Text>>				
C	Reason 3	<<Text>>				
11	Additional amount payable but not paid (due to reasons specified under Tables 6,8 and 10 above)					
			To be paid through Cash			
	Description	Taxable Value	Central tax	State tax / UT tax	Integrated tax	Cess, if applicable
	1	2	3	4	5	6
	5%					
	12%					
	18%					

COMMENT:

- **PART III:** It is reconciliation of tax paid as per Form GSTR 9C and Form GSTR 9. Rate wise details are to be given. "RC" under this table means, Tax paid under RCM
- **PARA 9P:** It is total of 9A to 9O and it will be auto reflected
- **PARA 9Q:** Amount payable as declared in Table 9, Table 10, Table 11 of the Form GSTR9 shall be declared here.
- **PARA 10:** Reasons for non-reconciliation between payable / liability declared in Table 9P and the amount payable in Table 9Q shall be specified here
- **PARA 11:** It will be auto reflected
- **PARA 7F:** Amount which is payable due to reasons specified under Table 6, 8 and 10 shall be declared here

FORM GSTR 9C : FY 17-18: PART IV

IV	
12	**Reconciliation of Net Input Tax Credit (ITC)**

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)		
B	ITC booked in earlier Financial Years claimed in current Financial Year	(+)	
C	ITC booked in current Financial Year to be claimed in subsequent Financial Years	(-)	
D	ITC availed as per audited financial statements or books of account		<Auto>
E	ITC claimed in Annual Return (GSTR9)		
F	Un-reconciled ITC		ITC 1
13	Reasons for un-reconciled difference in ITC		
A	Reason 1	<<Text>>	
B	Reason 2	<<Text>>	
C	Reason 3	<<Text>>	
14	Reconciliation of ITC declared in Annual Return (GSTR9) with ITC availed on expenses as per audited Annual Financial Statement or books of account		

	Description	Value	Amount of Total ITC	Amount of eligible ITC availed
	1	2	3	4
A	Purchases			

COMMENT:

- **PARA 12A:** Total ITC availed amount is never disclosed on the face of Balance Sheet. Therefore, it is to be derived from Books of Accounts. Net ITC availed (after reversal if any) is to be reported here.
- **PARA 12B:** ITC which was recorded in books in earlier FY, but availed in GSTR 3B of current FY shall be declared here. This **includes Transitional Credit**.
- **PARA 12C:** ITC which was recorded in books in current FY, but not availed in GSTR 3B of current FY shall be declared here.
- **PARA 12D:** It will be auto reflected
- **PARA 12E:** ITC available for utilization as declared in Table 7J of Form GSTR9 shall be declared here.
- **PARA 12F and 13:** Reasons for non-reconciliation of ITC to be shall be specified here
- **PARA 14A to 14R:** It is expenses wise ITC reco. of Financial Statement and Form GSTR 9. Expenses wise details are to be given for amount mentioned in Para 12D of Form GSTR 9C

FORM GSTR 9C : FY 17-18: PART IV

	Description	Value	Amount of Total ITC	Amount of eligible ITC availed
	1	2	3	4
A	Purchases			
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.)			
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			
R	Total amount of eligible ITC availed			<<Auto>>
S	ITC claimed in Annual Return (GSTR9)			
T	Un-reconciled ITC			ITC 2

15	Reasons for un - reconciled difference in ITC	
A	Reason 1	<<Text>>
B	Reason 2	<<Text>>
C	Reason 3	<<Text>>
16	Tax payable on un-reconciled difference in ITC (due to reasons specified in 13 and 15 above)	
	Description	Amount Payable
	Central Tax	
	State/UT Tax	

COMMENT:

- **PARA 14F:** Goods given as Free sample are not recorded as expenses. This head is incorrect.
- **PARA 14R:** It will be auto reflected
- **PARA 14S**: ITC available for utilization as declared in Table 7J of Form GSTR9 shall be declared here.

FORM GSTR 9C : FY 17-18: PART V

Pt. V	Auditor's recommendation on additional Liability due to non-reconciliation					
			To be paid through Cash			
	Description	Value	Central tax	State tax / UT tax	Integrated tax	Cess, if applicable
	1	2	3	4	5	6
	5%					
	12%					
	18%					
	28%					
	3%					
	0.25%					
	0.10%					
	Input Tax Credit					
	Interest					
	Late Fee					
	Penalty					
	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)					

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 there from.

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

Place: ....

Name of the signatory ....

Membership No.................

Date: ....

Full address ....

COMMENT:

- **AUDITORS RECOMMENDATION:** Part V consists of the auditor's recommendation on the additional liability to be discharged by the taxpayer due to **(a)** non-reconciliation of turnover or ITC **(b)** supplies not included in GSTR 9 **(c)** Refund erroneously taken **(d)** any other outstanding demands which is recommended to be settled by the auditor shall be declared in this Table.
- **TAX PAYABLE, DUE TO AUDIT OBSERVATION:** Towards, the end of the reconciliation statement taxpayers shall be given an option to pay their taxes as recommended by the auditor.

FORM GSTR 9 : FY 17-18: Verification

- ✓ **Audit Certification**

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 and Reconciliation Statement required to be furnished under section 44(2) of the CGST 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:

CONTACT US..!!

❖ **GST UPDATES, E BOOK, PRESENTATION**

❖ **CONTACT US**

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Thank You.

PRESENTED BY

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