

The Institute of Chartered Accountants of India

(Set up by an Act of Parliament)



Bengaluru Branch (SIRC) e-Newsletter

Volume 13 | Issue 4 | November 2024 | Pages : 24

English Monthly
For Private circulation only



- **ISA Certificate Course**
4th to 15th November 2024
- **Study Circle Meeting**
Latest amendments under GST law including amnesty scheme
6th November 2024
- **Forensic Audit Certificate Course**
11th to 18th November 2024
- **Study Circle Meeting**
Navigating SOX Controls, Key Insights and Global Career Prospects
13th November 2024
- **One Day Seminar on GST**
16th November 2024

JNANA PRAVARTANAM

Navigating this Journey with Compass of Knowledge



CPE MEETINGS

- **C P E Program**
Recent amendments and changes in GST
19th November 2024
- **Study Circle Meeting**
Workshop on the Art of representation under the GST Act
20th November 2024
- **One Day Seminar on Search & Seizure**
22nd November 2024

- **One Day Seminar on FEMA**
23rd November 2024
- **Study Circle Meeting**
GSTR 9 and 9C Checkpoints for preparedness to Departmental proceedings - A Practical walk through
27th November 2024
- **Forensic Audit**
9th to 15th December 2024
- **C P E Program**
Standards on Auditing and Code of Ethics
14th December 2024
- **Certification Course on AI for CA's**
19th to 21st December 2024

**Dear Esteemed Members of the
Bengaluru Branch,**

After the busy 2 months that were dedicated to Tax Audit assignments, it's now time to relax and celebrate **Deepavali** – the festival of lights which is almost celebrated across the world with immense joy & happiness. The glow of joy, prosperity and happiness brings with the beautiful memories, bright sparkles of contentment that stay with you through the days ahead. I wish all my dear colleagues and students a very Happy Deepavali!

In October, apart from the regular study circle meetings, we organized two Certificate Course in AI for Members in Practice and specially for Members in Industry as mentioned in the last month newsletter and the more batches are announced in the coming months.

Based on the member's interest in the Certification courses, we have announced other Certification courses on the website and few members have shown the interest. As per the request from the members we had opened the registrations for Forensic Audit Certificate Course in the November month very few registered for this & now again, we postponed it to December month. We request members to go through it & register for the same & other certificate courses.

We have lined up various Seminars in the month of November which is very much need of the hour to remain active and engaged in our profession, constantly seeking to enhance our expertise and understanding in various topics. The Seminars and CPE programs provide a platform for group discussions by sharing learned and expert guidance from the experts in these programs.

With the rapid development of the economy, the extraordinary role of a Chartered Accountant contribution to the economy has expanded to encompass a wide array of responsibilities. Let us strive to adapt, innovate, and excel in all facets of our profession. We excel ourselves to continuous learning and development, ensuring that we uphold the integrity and excellence of our profession.

ICAI is hosting the prestigious **World Forum of Accountants (WOFA) 2025 from 31st January to 2nd February at Yashobhoomi, New Delhi** – a state-of-the-art and a landmark event for our profession set to welcome thought leaders and professionals from around the globe! Please avail the Early Bird Discount on registration and let's create widespread awareness and encourage prompt registration to make WOFA 2025 an unforgettable experience for all. For more details click <https://wofa.icaai.org/>

Programmes for students:

The month of November is also the month of Examinations. Best wishes to all the students for their exams, all the very best!

Two Days **Mega Students Conference** is being organized on 20th & 21st December 2024 at Jnana Jyothi Auditorium, Bengaluru. Interesting topics and Speakers are handpicked from their respective fields. I request my professional colleagues to encourage your students to register in the above said conference.

Wish you all a very happy Deepavali.

With warm regards,

The Managing Committee Members
ICAI – Bengaluru Branch (SIRC)

CALENDAR OF EVENTS

CPE MEETINGS FOR THE MONTH OF NOVEMBER 2024

DATE AND DAY	TOPIC / SPEAKER	TIME	STRUCTURED CPE CREDIT
04.11.2024 to 15.11.2024	ISA Certificate Course <i>Organized under the aegis of</i> Digital Accounting and Assurance Board <i>Hosted by : Bengaluru Branch (SIRC)</i> <i>For more details check www.bangaloreicai.org</i>	Hotel Fairfield, JW Marriott, Rajajinagar, Bengaluru 10.00 am to 5.30 pm	25 hrs
06.11.2024 Wednesday	Study Circle Meeting Latest amendments under GST law including amnesty scheme CA. Annapurna D Kabra Delegate Fees: Members – Rs.200/- Plus GST	S.Narayanan Auditorium ICAI Bhawan, Vasanthnagar, Bengaluru 6.00 pm to 8.00 pm	2 hrs
11.11.2024 to 18.11.2024	Forensic Audit Certificate Course <i>Organized under the aegis of</i> Digital Accounting and Assurance Board - ICAI <i>Hosted by : Bengaluru Branch (SIRC)</i> <i>For more details check www.bangaloreicai.org</i>	Hotel Fairfield, JW Marriott, Rajajinagar, Bengaluru 10.00 am to 5.30 pm	25 hrs
13.11.2024 Wednesday	Study Circle Meeting Navigating SOX Controls, Key Insights and Global Career Prospects CA. Virinchi Nandula V S D Delegate Fees: Members – Rs.200/- Plus GST	S.Narayanan Auditorium ICAI Bhawan, Vasanthnagar, Bengaluru 6.00 pm to 8.00 pm	2 hrs
16.11.2024 Saturday	One Day Seminar on GST <i>Organized by : Bengaluru Branch (SIRC)</i> Delegate Fees: Members – Rs.900/- Plus GST <i>Details at Pg. No.18</i>	API Bhawan, Vasanthnagar, Bengaluru 10.00 am to 6.00 pm	6 hrs
19.11.2024 Tuesday	C P E program Recent amendments and changes in GST CA. Annapurna Srikanth	Chartered Accountants Association building, Tumkur 10.00 am to 2.00 pm	3 hrs



CALENDAR OF EVENTS

CPE MEETINGS FOR THE MONTH OF NOVEMBER & DECEMBER 2024

DATE AND DAY	TOPIC / SPEAKER	TIME	STRUCTURED CPE CREDIT
20.11.2024 Wednesday	Study Circle Meeting Workshop on the Art of representation under the GST Act CA. Annapurna D Kabra & CA. Siddeshwar Yelamali Delegate Fees: Members – Rs.250/- Plus GST	S.Narayanan Auditorium ICAI Bhawan, Vasanthnagar, Bengaluru 4.00 pm to 7.00 pm	3 hrs
22.11.2024 Friday	One Day Seminar on Search & Seizure under the Income Tax Act, 1961 & GST Laws <i>Organized by : Bengaluru Branch (SIRC)</i> Delegate Fees: Members – Rs.1,500/- Plus GST <i>Details at Pg. No.19</i>	Hotel Fairfield, JW Marriott, Rajajinagar, Bengaluru 9.30 am to 6.00 pm	6 hrs
23.11.2024 Saturday	One Day Seminar on FEMA <i>Organized by : Bengaluru Branch (SIRC)</i> Delegate Fees: Members – Rs.1,500/- Plus GST <i>Details at Pg. No.20</i>	Hotel Fairfield, JW Marriott, Rajajinagar, Bengaluru 10.00 am to 6.00 pm	6 hrs
27.11.2024 Wednesday	Study Circle Meeting GSTR 9 and 9C Checkpoints for preparedness to Departmental proceedings - A Practical walk through CA. Akshay M Hiregange Delegate Fees: Members – Rs.250/- Plus GST	S.Narayanan Auditorium ICAI Bhawan, Vasanthnagar, Bengaluru 5.00 pm to 8.00 pm	3 hrs
30.11.2024 Saturday	C P E program GSTR 9 and 9C Checkpoints for preparedness to Departmental proceedings - A Practical walk through CA. Rajesh Kumar T R Delegate Fees: Members – Rs.500/- Plus GST	Tumkur District Chartered Accountants Association building, Tumkur 10 am to 2 pm with tea break from 11.30 to 11.45 am	3 hrs
09.12.2024 to 15.12.2024	Forensic Audit Certificate Course <i>Organized under the aegis of</i> Digital Accounting and Assurance Board - ICAI <i>Hosted by : Bengaluru Branch (SIRC)</i>	Hotel Fairfield, JW Marriott, Rajajinagar, Bengaluru	25 hrs

CALENDAR OF EVENTS CPE MEETINGS FOR THE MONTH OF DECEMBER 2024

DATE AND DAY	TOPIC / SPEAKER	TIME	STRUCTURED CPE CREDIT
14.12.2024 Saturday	C P E program Standards on Auditing and Code of Ethics CA. Sujay K N and CS. Bharath L Delegate Fees: Members – Rs.500/- Plus GST	Tumkur District Chartered Accountants Association building, Tumkur 10 am to 2 pm with tea break from 11.30 to 11.45 am	3 hrs
19.12.2024 to 21.12.2024	Certification Course on AI for CA's Organized under the aegis of Digital Accounting and Assurance Board Hosted by : Bengaluru Branch (SIRC) For more details check www.bangaloreicai.org	S.Narayanan Auditorium ICAI Bhawan, Vasanthnagar, Bengaluru 10.00 am to 6.00 pm	18 hrs

Bengaluru Branch of SIRC of ICAI Congratulations

RANK HOLDERS - SEPTEMBER 2024 EXAMS

Sl No.	Name	SRO NO	Roll No	Total Marks Obtained	CITY RANK
Intermediate					
1	RAGHAVENDRA M	SRO0872566	112279	385	1
2	JAYANTH KUMAR M	SRO0734849	112204	346	2
3	RAVURU SANTHOSH KUMAR	SRO0744308	112217	343	3
4	DEEKSHA T P	SRO0809628	111913	342	4
5	KYRA BIRADAR	SRO0789852	110866	339	5
6	PARAS RAVI GANGWANI	WRO0816821	109119	339	5

Advertisement Tariff for the Branch e-Newsletter

COLOUR FULL PAGE

Outside back ₹ 40,000/-
Inside back ₹ 30,000/-

INSIDE BLACK & WHITE

Full page ₹ 20,000/-
Half page ₹ 10,000/-
Quarter page ₹ 5,000/-

Advt. material should reach us before 22nd of previous month.

SUB EDITOR :
CA. KAVITHA PARAMESH

Disclaimer: The Bengaluru Branch of ICAI is not in anyway responsible for the result of any action taken on the basis of the articles and advertisements published in the e-Newsletter. The views and opinions expressed or implied in the Branch e-Newsletter are those of the authors/guest editors and do not necessarily reflect that of Bengaluru Branch of ICAI.



RECENT AMENDMENTS AND CLARIFICATIONS UNDER GST LAW

Adv. Saiprasad and CA. Annapurna Kabra



Amnesty Scheme

1. Based on the recommendations of the GST Council in its 53rd meeting, Amnesty scheme was introduced by way of insertion of S.128A into CGST Act, 17 wef 1.11.24 to provide for waiver of interest and penalty or both relating to demands u/s 73 of GST Acts, 17, pertaining to tax period 1.7.17 to 31.3.20.
2. S.146 of FA, 24, inserted S.128A to CGST Act, 17. The column notes to S.128A states as follows – ‘Waiver of interest or penalty or both relating to demands u/s 73, for certain tax periods’
3. Thus the waiver of interest and penalty applies only to SCN issued u/s 73 and not u/s 74 or 76 of any other provisions of the Act.
4. The tax period for SCN u/s 73 must be pertaining to the period from 1.7.17 to 31.3.20 (S.128A(1))
5. S.128A applies to demands pending at various stages of adjudication, appeal/ revisionary/ court forums. They are as follows:
 - a. Where a notice has been issued u/s 73 but order has not yet been passed – 128A(1)(a)
 - b. Where an order has been passed u/s 73 but order has not been issued u/s 107 (i.e. appeal filed against order issued u/s 73 but first appellate authority has not yet issued his order) or
 - c. Where an order has been passed u/s 73 but order has not been issued u/s 108 (i.e. revisionary authority has taken up the order for suo moto revision but has not yet passed revisionary order) Where an order has been passed u/s 107 or 108 but order has not been passed u/s 113 (i.e. where the first appellate authority or revisionary authority has passed their respective orders but order has not been passed by the Tribunal (GSTAT) – i.e. appeals pending to be filed before Tribunal)
6. Where a notice has been issued u/s 74 and the first appellate authority holds that there is no fraud, suppression or wilful mis-statement and remands the case back to determine tax for normal period of limitation u/s 73, as per S.75(2) of the Act, the said notice/ order originally issued u/s 74 shall be treated as notice/ order issued u/s 73 – First proviso to S.128A(1) of CGST Act, 17
7. After the conclusion of proceedings u/s 128A, in cases where:
 - a. department filed appeal before:
 - i. first appellate authority u/s 107(3) or
 - ii. before the Tribunal i.e. GSTAT u/s 112(3) or
 - iii. before the High Court u/s 117(1) or
 - iv. before the Supreme Court u/s 118(1) or
 - b. suo moto proceedings are initiated by revisionary authority u/s 108, against S.73 order for S.107 order of first appellate authority

Then in such cases, the condition is that the applicant has to pay ‘additional amount of tax payable’, if any in accordance with the aforesaid orders. This additional amount has to be paid within three months from the date of the aforesaid orders – Second proviso to S.128A(a)
8. If any interest or penalty has already been paid wrt an order u/s 73, for which application is now made, then no refund of the same shall be available. – Third proviso to S.128A(1)
9. This scheme shall not be applicable to proceedings initiated u/s 73 wrt amount payable on account

of erroneous refunds. In other words, if erroneous refunds is ultimately found to be taken, then interest and penalty would be payable. – S.128A(2)

10. This scheme will become applicable in respect of cases where appeal or writ petition pending before appellate authority or appellate tribunal or court is withdrawn by the applicant on or before date to be notified.
11. In the opinion of the author N.No.21/24 CT only notifies the 'date upto which payment for tax payable' can be made. It does not notify the date within which appeal has to be withdrawn. Therefore the author is of the understanding that date of withdrawal shall be the date as eligible to apply u/s 128A(1).
12. Where amount specified u/s 128A(1) has been paid and the proceedings are deemed to be concluded, then no appeal u/s 107(1) or 112(1) can be preferred by the applicant subsequently. – S.128(4)
13. A perusal of S.128(4) r/w 2nd proviso to S.128A(1) brings out the fact that while applicant cannot file an appeal once the proceedings are concluded under this scheme, the department can very well file appeal against the S.73 order before any of the appellate forums or the revisionary authority can take up the S.73 order for suo moto revisions and if any further demand becomes payable, such additional demand is also payable by applicant. The only silver lining is that interest and penalty is not payable on such additional tax liability.

Payment timelines as notified by N.No.21/24 CT

14. Condition for applying u/s 128A is that the applicant must pay 'full amount of tax' payable as per notice (a above) or orders (b and c above) on or before 31.3.25 (as notified by N.No.21/24 CT), where orders have already been passed.
15. If notice had originally been issued u/s 74 but the first appellate authority had held that there was no fraud or suppression or wilful mis-statement and the proceedings was converted to S.73 by way of remand, then time for payment will be six months from the date of issuance of order u/s 73 by proper officer

Prescription – Rule 164 of CGST Rules, 17

16. Para 14 of N.No.20/24 CT has prescribed the rules relating to S.128A. It states that the rules shall be inserted wef 1.11.24.
17. Rule 164 reads as procedure and conditions for closure of proceedings u/s 128A in case of demands u/s 73
18. A person who is eligible u/s 128A(1)(a) i.e. where the notice or statement has been issued u/s 73(1) or (3) respectively and order has not been issued u/s 73(9), then such person shall file application in Form GST SPL 01 (SPL – Special Procedure Law) on GST portal providing details of said notice or statement along with payment made in Form DRC 03 towards demand– R.164(1)
19. A person who is eligible u/s 128A(1)(b) and (c) i.e. order passed u/s 73(9) but appellate/ revisionary/ court orders not passed or where orders have been passed by appellate/ revisionary/ court, then such person shall file application in Form GST SPL 02 on GST portal providing details of orders along with details of payment made towards demand.
 - a. The condition in the above case is that payment must be made only by crediting the amount against the liability (debit entry) created in electronic liability register
 - b. However if payment towards aforesaid tax demanded has been made through Form DRC 03, an application in Form DRC 03A, as prescribed in sub rule 142(2B) shall be filed for crediting the amount against the liability created in liability register.
 - c. The **important point** to be kept in mind in Form DRC 03A has to be filed first/ before filing Form GST SPL 02, in a case where payment towards said demand has already been paid in DRC 03.
 - d. Para 3.2.2 of Circular No.238/32/2024 GST has clarified that in the aforesaid case, for the purpose of reckoning the date of payment, the date of DRC



03 must be considered and not the date of DRC 03A which seeks to adjust the liability by way of a credit in the liability register.

- e. The discerning reader would note that DRC 03A is applicable only in a case where orders have been passed and not in a case where notice or statement has been issued. The reason being liability would be created in electronic liability register only on passing the order and issuer of DRC 07. Since no such liability exists in a case where notice/ statement is pending adjudication, no liability exists and hence DRC 03A would not be applicable since there exists no liability in liability register. (R.164(2))

20. Where notice or order includes demand of tax partially on account of erroneous refund and partially on account of other reasons, SPL 01 or 02 can be filed only after payment of full amount of tax demanded in the notice or order (i.e. after payment of amount demanded toward erroneous refunds also). In para 3.3.8 of Circular No.238/32/2024 GST dt.15.10.24, it has been clarified that waiver of interest and penalty will however not be available wrt erroneous refund. – R.164(3)

21. Where notice or order includes demand of tax partially for the period 1.7.17 to 31.3.20, and partially for subsequent periods also, then SPL 01 or 02 can be filed only after payment of full amount of tax demanded in the said notice or order before 31.3.25/ six months from date on which order is passed u/s 73, pursuant to remand u/s 75(2). Further in such cases, Circular No.238/32/2024 GST dt.15.10.24 clarifies at para 3.3.9 that opportunity of personal hearing would be granted to the Applicant wrt demands pertaining to periods post 31.3.20. – R.164(4)

22. Circular No.238/32/2024 GST dt.15.10.24 further clarifies at para 3.3.9 that where it is found that interest and penalty is payable by the applicant on account of some demand pertaining to the period other than amnesty period or pertaining to erroneous refund, the detail of the same shall be mentioned in column no. 19 and column no. 20 of

FORM GST SPL-05 or FORM GST SPL-06, as the case may be.

23. Rule 164(5) states that the amount payable under this scheme would be that amount which remains payable after deducting amounts which is not payable in accordance with S.16(5) and 16(6), which was demanded in the statement or notice or order issued u/s 73

- a. S.16(5) and (6) has been inserted by S.118 of FA, 24.
- b. S.16(5) provides for availing credit wrt FY 17-18, 18-19, 19-20, 20-21, in a case where registered person has filed returns u/s 39 before 30.11.21
- c. S.16(6) provides for availing credit wrt to a cancelled registration, which has since been restored either pursuant to revocation of cancellation or appellate orders by First Appellate Authority or Courts.
- d. Since the aforesaid provisions were inserted only by FA, 24, demands would have already been created in the notice/ orders issued for the period 1.7.17 to 30.3.20. These notices/ orders would contain demands either u/s 16(4) or would not contain provisions for allowing credit in a case where demand is raised pursuant to cancelled registration being restored.
- e. Circular No.328/32/2024 GST clarifies that applicant is required to pay only the amount that is payable, calculated after deducting the amount not payable in accordance with sub-section (5) or sub-section (6) of Section 16, from the amount payable in terms of the notice or statement or order under section 73, as the case may be, before submitting the application
- f. The circular further clarifies that the applicant is advised to provide a breakup of the amount not payable by him anymore, as per sub-sections (5) and (6) of section 16, in FORM GST SPL-01 or FORM GST SPL-02, as the case may be, to enable the officer to verify the payment easily
- g. The circular in addition to the above clarifies that where the taxpayer is deducting the amount of

ITC which was denied on account of contravention of sub-section (4) of section 16 of the CGST Act, but which is now available, as per retrospectively inserted provisions of sub-section (5) or sub-section (6) of section 16 of the CGST Act, he is not required to file application for rectification in respect of the same as per special procedure notified under Section 148 vide notification No. 22/2024-Central tax dated 8th October 2024

24. Any person who wishes to file application in SPL 01 or 02 shall apply within a period of three months from the date notified u/s 128A(1). N.No.21/24 notifies S.128A(1) date wrt payment as 31.3.25. Para No.3.1.5 of Circular No.238/32/2024 GST dt.15.10.24, clarifies that SPL 01 or 02 shall be filed within a period of 3 months from 31.3.25 i.e. 30.6.25. – R.164(6)
25. The proviso to R.164(6) states that where SPL 02 is to be filed in a case where S.75(2) is applicable, the time limit for filing the said application would be 6 months from the date of communication of order u/s 73. Proviso to R.164(6)
26. What is interesting is as per N.No.21/24 CT dt.8.10.24, the time limit for payment in aforesaid case six months from date of issuance of order u/s 73. Thus both the application time lines and payment time lines are capped at 6 months from date of communication/ issuance of order for S.75(2) cases as compared to others (i.e. other than S.75(2) remand cases) SPL 01 or 02 cases, time line for filing application is 3 months after payment date.
27. SPL 01 and 02 shall be accompanied by documents evidencing withdrawal of appeal or writ petition – R.164(7)
 - a. Where application for withdrawal has been filed before the appellate forums but the withdrawal order has not been issued till the date of filing application, then copy of withdrawal application shall be uploaded.
 - b. The copy of the order shall be uploaded within one

month from the date of issuance of withdrawal order. -Proviso to R.164(7)

Adjudication Mechanism under Amnesty Scheme

Cases where notices are issued for eligibility under amnesty scheme

28. Where proper officer is of the view that application made in SPL 01 or 02 is liable to be rejected on account of ineligibility, a *notice* shall be issued on common portal to Applicant in SPL 03. – R.164(8)
29. The time limit to issue SPL 03 is within 3 months from date of receipt of SPL 01 or 02. An opportunity for hearing shall also be granted. – R.164(8)
30. Applicant shall file *reply* in SPL 04 within one month from the date of receipt of notice in SPL 03. – R.164(9)
31. Where proper office accepts the reply and finds that Applicant is eligible for the scheme, he shall issue *order* in SPL 05 on common portal accepting SPL 01 or 02 and *concluding* the proceedings u/s 128A. – R.164(10). In a case where proper officer is not satisfied with the reply, he shall issue an order in SPL 07, rejecting application made in SPL 01/02. – R.164(12)
32. In a case where SPL 05 is issued pertaining to a notice or statement u/s 73, DRC 07 shall not be required to be issued under rule 142(5) of GST Rules, 17 – R.164(11)
33. In a case where SPL 05 is issued pertaining to cases *other than above*, liability created in liability register shall be modified accordingly. R.164(11). In the understanding of the author the modification is required to reduce interest and penalty and also to reduce liability now falling under 16(5) and (6) of GST Act, 17.

Cases where notices are NOT issued for eligibility under amnesty scheme

34. In a case where notice is not issued in SPL 03, proper officer shall issue order in SPL 05 under sub rule 164(10), within a period of 3 months from the date of receipt of application in SPL 01/02. – R.164(13)(a).



35. Para 3.4.1 of Circular No.238/32/2024 GST clarifies that no appeal shall lie u/s 107 against order issued in SPL 05, concluding the proceedings u/s 128A (i.e. department cannot file appeal against order accepting SPL 01/02). However applicant can file appeal against order in SPL 07 rejecting SPL 01/02.
36. In cases where notice is issued in FORM GST SPL-03, the proper officer shall issue the order within a period of three months from the date of receipt of reply in FORM GST SPL-04. In cases where reply is not received by the Applicant in SPL 04, the proper officer shall issue the order in FORM GST SPL-05 within a period of four months from date of filing SPL 01/02. Rule 164(13)(b)
37. The time period beginning from filing withdrawal application till date of issue of withdrawal order shall not be considered for computing above period. – Explanation to Rule 164(13)
38. **In case SPL 05 is not issued within the specified time as aforesaid, then the application in SPL-01 and SPL 02 shall be deemed to be approved and the proceedings shall be deemed to be concluded.**
39. Appeal can be filed against order in SPL 07, rejecting the application in SPL 01/02. The time limit to file appeal is 3 months as specified u/s 107(1) of CGST Act, 17. Para 3.4.2 of Circular No.238/32/2024 clarifies that subject matter of appeal will only be regarding applicability of waiver of interest and penalty u/s 128A and not on merits of the case.
40. Para 3.4.1 of Circular No.238/32/2024 GST clarifies that normally, no pre-deposit may be required to be for filing the aforesaid appeal, as the said amount may already have been paid as a part of payment of tax dues involved in the demand notice/ statement / order before filing an application in FORM GST SPL-01 or FORM GST SPL-02. *However, in cases where no amount of tax dues has been paid or amount of tax dues paid is less than the requisite amount for pre-deposit for filing appeal as per sub-section (6) of section 107, the remaining amount of pre-deposit will be required to be paid for filing the said appeal.*
41. If no Appeal is filed against SPL 07, within 3 months u/s 107(1) before the First Appellate Authority, then the original appeal (if any), filed by the Applicant against order (pending either before FAA or Tribunal), which was withdrawn before filing application in SPL 02 shall be restored. – R.164(15)(a)
42. In case where appeal is filed against the order in FORM SPL -07 and appellate authority holds that the rejection of application by proper officer is not correct, then **appellate authority himself shall pass an order** in FORM GST SPL-06 on the common portal **accepting the said application and concluding the proceedings**. – R.164(15)(b)(i)
43. Para 3.4.4 of Circular No.238/32/2024 GST clarifies that department cannot file appeal against order issued in FORM GST SPL-06, allowing SPL 01/02.
44. In case where appeal is filed against the order in FORM SPL -07 and appellate authority holds in APL 04 that the rejection of application by proper officer is correct then the original appeal (if any), filed by the Applicant against an order (pending either before FAA or Tribunal), which was withdrawn before filing application in SPL 02 shall be restored. However restoration is subject to the condition that Applicant files an undertaking in Form SPL 08 that he shall not file an appeal against the order of the First Appellate Authority rejecting his application in SPL 01/02. This undertaking in SPL 08 has to be filed within a period of 3 months from the date of issuance of order by First Appellate Authority in Form APL 04, rejecting SPL 01/02. – R.164(15)(b)(ii)
45. Tax payer is required to pay additional tax liability where department prefers appeal against order which has been subject to SPL 02. If the appeal is held in favour of the department requiring the Applicant to pay 'additional tax liability', then such additional tax liability is required to be paid within 3 months from the date of order (2nd proviso to S.128A). If the said additional tax liability is not paid within the aforesaid period of 3 months, then

the waiver of interest and penalty provided in SPL 05/06 shall become void. – R.164(16)

46. Tax payer is required to pay erroneous refund in a case where notice/ order contains erroneous refund in addition to tax liability. Further tax payer is required to pay tax liability for period post amnesty (period after 1.7.17 to 31.3.20) in a case where notice/ order is for amnesty period and period post amnesty (periods prior to and post 31.3.20). Interest and Penalty is required to be paid wrt aforesaid erroneous refund and demand for period post amnesty period. The details of such interest and penalty would be provided in SPL 05/06 as the case may be. This erroneous refund/ demand for period post 31.3.20 along with interest and penalty thereon shall be paid within a period of 3 months from the date of SPL 05/06. Where the aforesaid amounts have not been paid within 3 months, the waiver of interest and penalty u/s 128A shall be void. – R.164(17)
47. In the understanding of the author, the flow seems to be that first the entire tax liability (including erroneous refund and period post amnesty) has to be paid. This task to be completed before 31.3.25 (exception 75(2) cases). Then Application has to be made in SPL 01/02. If the application is accepted, then penalty and interest wrt erroneous refund and period post amnesty has to be paid within 3 months from the date of issue of order accepting application in SPL 05/06. If payment of interest/ penalty not paid, then waiver granted in SPL 05/06 becomes void. The effect of SPL 05/06 becoming void is that the proceedings would come back to the state at which it was at the time of filing SPL 01/02 (except in cases where appeals was filed before Courts, in whose case, the cases would stand withdrawn)
48. The proper officer to accept SPL 01 would be the adjudicating officer who originally issued notice u/s 73. The proper officer to accept SPL 02 would be that officer who is in charge of recovery u/s 79 of GST Acts, 17.
49. If multiple notices/Statements/ orders are issued for the period from July 2017 to march 2020 then

separate application in Form GST SPL-01 or Form GST SPL-02 should be filed against each notice/ statement/order.

Other Clarifications given by Circular No.238/32/2024 GST

50. In many cases, the amount payable towards amnesty scheme would have been paid either before insertion of S.128A and in a few cases after insertion section 128A. Further amount could have been paid before or after the issuance of demand notice/order. It has been clarified that as long as tax/ additional tax is paid on or before 31.3.25, the benefit of amnesty scheme would be available.
51. It has also been clarified that amount recovered by the tax officers as tax due from any other person on behalf of the taxpayer, against a particular demand can be considered as tax paid towards S.128A. The condition is that the said recovery must be before 31.3.25.
52. However amount recovered by the tax officers as interest or penalty or both, pertaining to demand under Section 73 pertaining to Financial Years 2017-18, 2018-19 and 2019-20 cannot be adjusted towards tax liability. Further no refund of such interest/ penalty would be available.
53. Where the tax due has already been paid and the notice or demand orders under Section 73 only pertains to interest and/or penalty involved, the benefit of S.128A would be available.
54. Circular clarifies that the benefit is **not** available where the interest/ penalty pertains to S.75(12) cases i.e. difference between GSTR 1 and 3B or where self assessed tax is not paid.
55. Circular clarifies that if the taxpayer intends to avail partial waiver of interest or penalty or both, on certain issues, by making part payment of the amount demanded in the notice/ statement/ order, as the case may be, and opts to litigate for the remaining issues, then the benefit of amnesty scheme would not be available. In other words either the entire demand has to be accepted or



entire demand has to be subject to litigation. There can be no part acceptance of demands.

56. Circular clarifies that where the notice/order involves multiple periods, ranging from the period for which waiver provided in Section 128A is applicable, and includes some other tax periods for which such waiver is not applicable, then waiver would apply only for demands in amnesty period and not available for demands after amnesty period.
57. Circular clarifies that the benefit of amnesty scheme will be available for matters involving IGST and Compensation Cess
58. Circular clarifies that any demand in respect of transitional credit wrongly availed, for which notice is issued u/s 73 would be eligible for amnesty scheme.
59. Circular clarifies that **any** penalty, including penalties under section 73, section 122, section 125 etc, if demanded under the demand notice/ statement/ order issued under section 73, would be covered under the amnesty scheme. However, late fee, redemption fine etc are not covered.
60. **Circular clarifies that payment to avail waiver under amnesty scheme can be made by utilizing ITC. It can also be partly from cash and credit ledger. However, where the demand is in respect of any amount of tax to be paid under Reverse Charge Mechanism or by the Electronic Commerce Operator under section 9(5), then the said amount shall be paid by debiting the electronic cash ledger only and not through the electronic credit ledger**
61. Circular Further clarifies that where the amount has to be paid for demand of erroneous refund, the demand in respect of **erroneous refund paid in cash** is required to be paid **only by debiting the electronic cash ledger only** and not through the electronic credit ledger.
62. Circular clarifies that amnesty scheme would not be available to additional customs duty equivalent to IGST u/s 3(7) of Customs Tariff Act, 1975 since the said duty is payable under the Customs Act, 1962 and is not a GST liability but a customs duty liability.

63. The amount recovered by tax officers as tax dues from other person on behalf of the taxpayer against a particular demand shall also be considered as tax paid towards the same for purposes of section 128A.

64. Any amount paid by the taxpayer or recovered by the taxpayer as interest or penalty cannot be adjusted against the tax payable under section 128A.

Amendment to Rate Notifications

65. Metal scrap

Reverse Charge – N.No.6/24 CT (R) dt.8.10.24

N.No.4/17 CT (R) specifies the goods which are liable to reverse charge u/s 9(3) of GST Acts, 17. N.No.6/24 CT (R) has been issued amending N.No.4/17 CT (R) dt.28.6.17. A new entry no.8 has been inserted wherein Metal scrap supplied under chapter 72 to 81 by any unregistered person to any registered person is now liable to reverse charge in the hands of the registered person.

Registration – N.No.24/24 CT dt.9.10.24

Notification 5/2017 CT dt.19.6.17, exempts from registration, the persons who are only engaged in making taxable supplies where the total tax on which is liable to be paid on reverse charge basis by the recipient u/s 9(3) of the Act. The said notification has now been amended by N.No.24/24 CT dt.9.10.24 stating that the said notification will not apply to any person engaged in supply of metal scrap falling under chapter 72 to 81 in the first schedule to Customs Tariff Act 1975.

TDS – N.No.25/24 CT dt.9.10.24

Notification No.50/18 CT dt.13.9.18, specifies the persons who are liable to deduct TDS u/s 51(1) of GST Acts, 17. Clause (d) of S.51(1) of GST Acts, 17 allows the government to mandate such persons or category of persons as may be notified. The CG through N.No.25/24 CT dt.9.10.24 has now notified *'any registered person receiving supplies of metal scrap falling under Chapters 72 to 81 in the First*

Schedule to the Customs Tariff Act, 1975 (51 of 1975), from other registered person'

A perusal of the aforesaid notification lays down the following conditions to be satisfied for the TDS provisions to apply:

- a. The recipient must be a registered person
- b. The supply must be of metal scrap falling under CTH 72 to 81 of CTA, 75
- c. The supplier must also be a registered person.
- N.No.25/24 CT dt.9.10.24 has 'substituted' the third proviso to N.No.50/18 CT, the effect of which is that if the persons specified u/s 51(1) of GST Acts, 17 (namely department or establishment of the CG or SG, local authority, government agencies or such persons as notified by CG/ SG), are the recipients of metal scrap, then still TDS would be liable to be deducted on the said transaction.

(Rate and Non Rate Notifications both have been collated here since the amendments together related to metals scraps)

66. Reverse Charge for Renting other than Residential Dwelling - N.No.9/24 CT (R) dt.8.10.24

N.No.13/17 CT (R) dt.28.6.17 was issued stating the services, which are liable to reverse charge u/s 9(3) of GST Acts, 17. The said notification has now been amended by N.No.9/24 CT (R) dt.8.10.24, wherein Entry No. 5AB has been inserted with corrigendum dt.22.10.24.

The service which has been subject to reverse charge is '*service by way of renting of any immovable property other than residential dwelling*'

The supplier of the aforesaid 'renting of other than residential dwelling' service must be an unregistered person.

The recipient must be a registered person.

The net effect of this notification is that all commercial properties would be subject to GST irrespective of whether the supplier is a registered person or not. Thus rentals paid for commercial properties would now always be subject to GST

irrespective of the statute of the supplier (forward charge if supplier is registered; reverse charge if supplier is not registered).

67. Exemptions – 12/2017

- a. N.No.12/17 CT (R) dt.28.6.17, lists down the services which are wholly exempt from GST. N.No.8/24 CT (R) dt.8.10.24 has now been issued amending the aforesaid notification. The gist of the amendments are as follows:

Entry No.25A has been inserted wherein:

Supply of services by way of:

providing metering equipment on rent,
testing for meters/transformers/capacitors etc.,
releasing electricity connection,
shifting of meters/service lines,
issuing duplicate bills etc.,

which are incidental or ancillary to the supply of transmission and distribution of electricity provided by electricity transmission and distribution utilities to their consumers have been exempted

CircularNo.234/28/2024-GST dt.11.10.24 has been issued which provides a clarification wrt aforesaid exemption. It states that aforesaid exemption is effective from 10.10.24. However GST Council in its 54th Meeting, has recommended to regularise supply of aforesaid services wef 1.7.17 to 9.10.24 on 'as is where is' basis.

Para 9.4 of Circular states that 'as recommended by the 54th GST Council, services provided by an electricity transmission and distribution utility *which are incidental and ancillary to the supply of transmission and distribution of electricity*' is regularised

The author is of the opinion that exemption listed under Entry No.25A are therefore illustrative and not exhaustive. According to the author, all services which are incidental and ancillary to supply of transmission and distribution of electricity by such utility is exempt from GST.



b. Research and development services:

Entry No.44A has been inserted wherein: Research and development services against consideration received in the form of grants supplied by

a Government Entity; or

a research association, university, college or other institution, notified under clauses (ii) or (iii) of sub-section under S.35(1) of IT Act, 61.

The condition for claiming exemption is that the aforesaid entities i.e. research association, university, college or other institution, is so notified at the time of supply of research and development service

c. Affiliation Services by Central or State educational Board or councils or similar bodies to Schools :

- **Entry No.66A has been inserted wherein:** Services of affiliation provided by a Central or State Educational Board or Council or any other similar body, by whatever name called, to a school established, owned or controlled by the Central Government, State Government, Union Territory, local authority, Governmental authority or Government entity. The Affiliation services provided by Board/Councils are taxable except when it is provided to government schools. Such services provided to government schools are exempted w.e.f 10.10.2024 (**Not 8/2024 CT**). The payment of GST on services of affiliation provided by Board/Council are taxable. The levy of GST on such affiliation services are regularised on 'as is where is' basis for the period from 01.7.2017 to 17.6.2021 (Circular No 151/07/2021 has clarified that it is leviable at 18%). (**CircularNo.234/28/2024-GST**)

4. Rate Notification

N.No.11/17 CT (R) dt.28.6.17, provides the rate of GST for provision of services. This notification has been amended by N.No.7/24 CT (R) dt.8.10.24, wherein the following entry relating to transportation of passengers by helicopter has been added. The tax rate is 5% without any ITC.

“(ivb) Transportation of passengers, with or without accompanied baggage, by air, in a helicopter on seat share basis is liable to tax at 5% Provided that credit of input tax charged on goods used in supplying the service has not been taken.

CircularNo.234/28/2024-GST dt.11.10.24 has been issued which provides a clarification wrt aforesaid service. It states that aforesaid exemption is effective from 10.10.24. For the period from 1.7.17 to 9.10.24, Council has recommended to regularise the issue of 'seat share basis' on as is where is basis.

The circular has further clarified that charter of helicopter is liable to tax at the rate of 18%.

The author is of the opinion that there is a difference between 'charter of a helicopter' and 'booking a seat on a helicopter'. The amendment has been made to bring out the aforesaid difference and hold that booking of individual seats, which in some cases would amount to booking all the seats on a helicopter would not amount to 'charter' since the essential character of charter i.e. time of transportation, place of transportation and manner of usage of helicopter is not determined by the user when he books individual seats as compared to charter.

- N.No.1/17 CT (R) dt.28.6.17, provides the rate of GST for provision of goods. N.No.5/24 CT (R) dt.8.10.24,
 - wherein the following entries 233, 234 and 235 relating to goods has been added in schedule I “i.e Trastuzumab Deruxtecan, Osimertinib and Durvalumab” and the tax rate is notified at 5%..
 - wherein the following entry 32C (HSN Code 1905 90 30) relating to goods has been added in schedule II “Extruded or expanded products, savoury or salted (other than un-fried or un-cooked snack pellets, by whatever name called, manufactured through process of extrusion)” and the tax rate is notified at 12%
 - wherein the following entry 16 relating to goods has been substituted in schedule III “un-fried or un-cooked snack pellets, by whatever name called, manufactured through process of extrusion,

extruded or expanded products, savoury or salted” and the tax rate is notified at 18%

- wherein the following entry 435A (HSN code 9401 [other than 9401 10 00 or 9401 20 00] relating to goods has been substituted in schedule III “Seats (other than those of heading 9402), whether or not convertible into beds and parts thereof other than seats of a kind used in aircraft or seats of a kind used for motor vehicles” and the tax rate is notified at 18%
- wherein the following entry 210A (HSN code 9401 20 00] relating to goods has been substituted in schedule IV “Seats of a kind used for motor vehicles” and the tax rate is notified at 28%

68. Invoice by Recipient under reverse charge – N.No.20/24 CT

Section 117 of FA, 24 inserted sub clause (c) to S.13(3) of GST Act, 17 (TOS - Services). The said sub clause sought to provide the time of supply in a case where invoice is to be issued by the recipient (i.e. cases where suppliers is not registered under GST law and recipient being registered person is required to raise a self invoice u/s 31(3)(f) of GST Acts, 17).

Correspondingly S.122 of FA, 24 amended S.31(3) (f) of CGST Act, 17, wherein the words ‘within the period as may be prescribed’ was added. Thus the word prescribed means as prescribed by the CGST Rules, 17.

The aforesaid sections were made effective by N.No.17/24 CT dt.27.9.24, which made the aforesaid provision applicable from 1.11.24.

Since S.31(3)(f) of CGST Act, 17 contained the words prescribed, the prescription was provided by way of insertion of Rule 47A of CGST Rules, 17.

N.No.20/24 CT dt.8.10.24, inserted Rule 47A, which prescribes the time limit to issue invoice and reads as under:

Notwithstanding anything contained in rule 47, where an invoice referred to in rule 46 is required

to be issued under clause (f) of sub-section (3) of section 31 by a registered person, who is liable to pay tax under sub-section (3) or sub-section (4) of section 9, he shall issue the said invoice within a period of thirty days from the date of receipt of the said supply of goods or services, or both, as the case may be

The points to be noted are as follows:

- a. Rule 47A prescribes the time limit for goods and services
- b. Rule 47A applies to a case where supplier is not a registered person and tax is liable on RCM. (Rule 47 would apply in a case supplier is registered and tax is liable either on RCM or forward charge. This is the effect of the words ‘notwithstanding Rule 47’)
- c. Rule 47A overrides Rule 47. Rule 47 states that invoice ought to be issued within 30 days from the date of *supply* of service.
- d. The effect of overriding provision of Rule 47A is that invoice has to be issued within 30 days from the date of *receipt* of said supply of goods or service

69. GSTR 7 related amendments

- a. Waiver of late fees for filing GSTR 7: The total late fees payable under section 47 for failure to furnish the return in Form GSTR 7 shall be waived in excess of 1000/-. If the TDS to be deducted is nil then late fee stand waived. (Notification 23/2024 – Central Tax)
- b. Section 124 of FA, 24 amends S.39(3) of CGST Act, 17. The effect of the amendment is that before GSTR 7 ought to have been filed only when TDS was deductible for a particular tax period. The amended provision states that GSTR 7 is liable to be filed for every tax period even though there are no TDS deductions in a particular tax period. Further amended S.39(3) of CGST Act, 17 used the words ‘furnish returns within such time as may be prescribed’
- c. The prescription is now given by way of amendment to Rule 66 of CGST Rules, 17 by para 5 of N.No.20/24 CT.



- d. As per amended Rule 66 of CGST Rules, 17, GSTR 7 is to be filed on or before 10th day of succeeding calendar month. Before the time limit was prescribed in S.39(3) of CGST Act, 17 (as it read before amendment by FA, 24)

70. Refund of ITC

Rule 86(4A) & (4B) and Rule 96(10) of CGST Rules, 17 omitted

- a. Para 10 of Annexure A of 54th GST Council meeting speaks about the need to re examine provisions of Rule 96(10) and Rules 86(4A) and (4B)
- b. Rule 96(10) was inserted so as to restrict the possibility of double benefit when exporter had availed certain schemes such as Advance Authorisation and EOU scheme.
- c. Rule 96(10) also sought to prevent utilisation of ITC of domestic supplies to be off set against IGST for exports.
- d. Rule 89(4A) and (4B) sought to prescribe a one to one correlation of inputs and input service in case of deemed exports and merchant exports respectively
- e. Rule 89 (4A) and (4B) further did not prescribe the formula for calculation of refund amount. Hence there was no standard method for computation
- f. There was a request that since sub rules (4A) and (4B) of Rule 89 did not prescribe formula, the said refunds may also be granted using the formula prescribed in sub rule (4) of Rule 89
- g. Through insertion of aforesaid three provisions, it appeared that exporter who did not avail the benefit of schemes mentioned in the aforesaid provisions was allowed to utilise ITC and get refund of IGST paid on export without any restriction but exporter who claimed schemes mentioned in aforesaid provision would be subject to ITC restrictions.
- h. The law committee was of the opinion that once it is found that ITC utilised for discharging outward tax liability once exports is genuine then there should be no apprehension to allow refunds even to exporters who have received inputs under duty

free/ concession notifications.

- i. Hence law committee proposed for omission of aforesaid three provisions *with prospective effect*.
- j. Law committee further recommended that after the deletion of 89(4A) and (4B), refund of ITC on zero rate supply made without payment of tax to the exporters who have availed the benefit of exemptions mentioned in sub rule (4A) and (4B) shall be governed by formula provided in sub rule (4) of Rule 89 of CGST Rules
- k. Accordingly para 9(b) of N.No.20/24 CT omits sub rules (4A) and (4B) of Rule 89 and para 10 omits sub rule 96(10) of CGST Rules, 17

71. Preferential location charges

Preferential location charges are liable to GST at the same rate as of construction services before issuance of completion certificate where such charges are collected along with consideration for sale/transfer of residential/commercial properties. **(CircularNo.234/28/2024-GST)**

72. Goods Transport Services

The ancillary or incidental services provided by GTA in the course of transportation of goods by road such as unloading/loading, packing/unpacking, transshipment, temporary warehousing etc. will be treated as composite supply of transport of goods. If such services are not provided in the course of transportation of goods and are invoiced separately then these services will not be treated as composite supply of transport of goods **(CircularNo.234/28/2024-GST)**

73. Affiliation services provided by universities to colleges

The Affiliation services provided by the universities to colleges are not by way of "services related to admission of students to such colleges or conduct of examinations by such colleges". Such services cannot enjoy the exemption under 12/2017 and therefore such services are liable to GST at the rate of 18% **(Circular No.234/28/2024-GST)**

74. Eligibility of Input tax credit on demo vehicle

As demo vehicles promote sale of similar type of motor vehicles, so they can be considered to be used by the dealer for making 'further supply of such motor vehicles. Accordingly, input tax credit in respect of demo vehicles is eligible under GST law. If such vehicles are used by authorised dealer for transportation of employees/management then input tax credit is restricted. In case the dealer is providing marketing and/or facilitation services to the vehicle manufacturer and is not making the supply of motor vehicles on his own account then input tax credit in respect of demo vehicles is not eligible under GST law. The input tax credit on demo vehicles is not affected by way of capitalisation of vehicle in the books of Account of the authorised dealers subject to other provision of the Act. In case of capitalised demo vehicles which is subsequently sold by the dealer then it is liable to tax as per section 18(6) read with Rule 44 of CGST Rules 2017 (Circular No. 231/25/2024-GST)

75. Rectification procedure where notice is issued under section 73,74, 107, 108 confirming demand of wrong availment of ITC under section 16(4) of CGST Act 2017. (Notification 22/2024- CT dated 08.10.2024)

Section 16(5) and section 16(6) provides the benefits of availment of ITC retrospectively from 01.7.2017.

As per N.No. 22/24 CT dt.8.10.24, the rectification procedure is applicable only in case where appeal is not filed against the order.

The author is of the understanding that where appeal is filed, the Appellate Forums (AA or GSTAT) would consider S.16(5) and (6) while passing their respective orders. Hence rectification procedure would be in applicable to them since the matter is sub judice before the respective authorities.

As per N.No.22/24 CT dt.8.10.24, the applicant has to file electronically on the GST portal, within 6 months from the date of issue of N.No.22/24 CT

(i.e. 8.10.24 + 6 months = 7.4.25), an application for rectification of order issued u/s 73 or 74 or 107 or 108 confirming demand of wrong availment of ITC on account of contravention of S.16(4) of GST Acts, 17.

The proper officer for carrying out rectification of the said aforesaid orders shall be the authority who had issued such order, and the said authority shall take a decision on the said application and issue the rectified order, as far as possible, within a period of three months from the date of the said application.

The proper officer shall upload a summary of the rectified order electronically in:

- FORM GST DRC-08, in cases where rectification of an order issued under section 73 or section 74 of the said Act or
- FORM GST APL-04, in cases where rectification of an order issued under section 107 (FAA) or section 108 (RA) of the said Act

The application should be made as notified to concerned authority and they should conclude within three months from the said application by passing rectification order as DRC 08 or APL-04. The rectification should be made only for 16(4) demand and principles of natural justice to be followed.

With reference to availment of input tax credit under section 16(5) and section 16(6) of CGST Act 2017, in case where investigation or audit proceedings are in process and demand notice is not issued or intimation is issued in DRC -01A. or where the notice is issued by adjudication officer or appeal is filed before Appellate Authority or proceedings are pending before Revisional Authority then they should conclude the order based on section 16(5) and 16(6) of CGST Act 2017. Where order under 73,74,107,108 is issued and appeal is not filed then taxpayer can apply for rectification within six months from the date of issuance of notification.

The tax already paid or input tax credit reversed against 16(4) is not eligible for refund under GST law (Circular 237/31/2024 dated 15.10.2024)



One Day Seminar on GST

6 hrs
CPE

Organised by **Bengaluru Branch (SIRC)**

On **Saturday, 16th November 2024**

Venue: **S. Narayanan Auditorium, Vasanthnagar, Bengaluru**

Time: **10.00 am to 6.00 pm**

TIMINGS	TOPICS	SPEAKERS
9.30am to 10.00am	Registration & Networking	
10.00am to 11.15 am	Section 128A Waiver of Interest and Penalty	CA. T.R. Rajesh Kumar
11.15am to 11.45 am	TEA BREAK	
11.45 noon to 1.00pm	Safari Judgements – Implications	Adv. K.S. Naveen Kumar
1.00pm to 2.00pm	LUNCH BREAK	
2.00pm to 3.15pm	GST on Plotted Development	CA. Sandesh Kutnikar
3.15pm to 3.45pm	TEA BREAK	
3.45pm to 5.00pm	RCM – Scrap, Immovable Property and other entries	CA. Naveen Raj Purohit
5.00 pm to 6.00 pm	GST on Related Parties	CA. Hanish S

Chairman
Bengaluru Branch (SIRC)

CA. Kavitha Paramesh
Secretary
Bengaluru Branch (SIRC)

Online Registration open

DELEGATE FEES :	For MEMBERS:	For NON MEMBERS:
PHYSICAL	Rs. 900/- (Plus GST)	Rs. 1,800/- (Plus GST)

Mode of Payment: Online / Cash / Cheque in favour of

"Bangalore Branch of SIRC of ICAI", payable at Bengaluru

For Registration, click www.bangaloreicai.org | Tel: 080 4394 4868 / 876, 96069 13003

One Day Seminar on Search & Seizure under the Income Tax Act, 1961 & GST Laws

Organised by **Bengaluru Branch (SIRC)**

On **Friday, 22nd November 2024**

Venue: **Hotel Fairfield, JW Marriott, Rajajinagar, Bengaluru**

Time: **9.30 am to 6.00 pm**

6 hrs
CPE

TIMINGS	TOPICS	SPEAKERS
9.45 am to 10.15 am	Inauguration by the Distinguished Personality	
10.15 am to 11.15 am	Fundamentals of Search under the IT Act, 1961 (Procedural Aspects)	CA. K R Pradeep
11.15 am to 11.30 am	TEA BREAK	
11.30 am to 12.30 pm	Post-Search Procedures under the IT Act, 1961	CA. Sachin Kumar B P
12.30 pm to 1.30 pm	Inspection & Search under the GST laws – Session 1	CA. Rajesh Kumar T R & CA. Kuber Hundekar
1.30 pm to 2.15 pm	LUNCH BREAK	
2.15 pm to 3.15 pm	Inspection & Search under the GST laws – Session 2	CA. Rajesh Kumar T R & CA. Kuber Hundekar
3.15 pm to 4.15 pm	New Regime of Search Assessment under the IT Act, 1961 (Block Assessment)	CA. Prashanth G S
4.15 pm to 4.30 pm	TEA BREAK	
4.30 pm to 5.30 pm	Open House (Brain-trust Session)	CA. A. Shankar CA. S. Venkataramani

Chairman
Bengaluru Branch (SIRC)

CA. Kavitha Paramesh
Secretary
Bengaluru Branch (SIRC)

Online Registration open

DELEGATE FEES :	For MEMBERS:	For NON MEMBERS:
PHYSICAL	Rs. 1,500/- (Plus GST)	Rs. 3,000/- (Plus GST)

Mode of Payment: Online / Cash / Cheque in favour of
"Bangalore Branch of SIRC of ICAI", payable at Bengaluru

For Registration, click www.bangaloreicai.org | Tel: **080 4394 4868 / 876, 96069 13003**



One Day Seminar on **FEMA**

6 hrs
CPE

Organised by **Bengaluru Branch (SIRC)**

On **Saturday, 23rd November 2024**

Venue: **Hotel Fairfield, JW Marriott, Rajajinagar, Bengaluru**

Time: **10.00 am to 6.00 pm**

TIMINGS	TOPICS	SPEAKERS
9.30am to 10.00am	Registration & Networking	
10.00am to 11.30am	Panel Discussion on - FEMA Overview and Analysis of Current Trends	Panelists from Banks and Industry experts**
11.30am to 12.00 noon	TEA BREAK	
12.00 noon to 1.30pm	Income-tax and FEMA – Compliance, Certifications on Overseas Remittances	CA. Suchint Majmudar
1.30pm to 2.30pm	LUNCH BREAK	
2.30pm to 4.00pm	Analysis of FDI - Venture Capital, Private Equity and M&A Transactions – a FEMA Perspective	Eminent Speaker
4.00pm to 4.30pm	TEA BREAK	
4.30pm to 6.00pm	FEMA – Overseas Investments, LRS and Compliance	CA. Vivek Malliya

*** Confirmation Awaited*

Chairman
Bengaluru Branch (SIRC)

CA. Kavitha Paramesh
Secretary
Bengaluru Branch (SIRC)

Online Registration open

DELEGATE FEES :	For MEMBERS:	For NON MEMBERS:
PHYSICAL	Rs. 1,500/- (Plus GST)	Rs. 3,000/- (Plus GST)

Mode of Payment: Online / Cash / Cheque in favour of
"Bangalore Branch of SIRC of ICAI", payable at Bengaluru

For Registration, click www.bangaloreicai.org | Tel: 080 4394 4868 / 876, 96069 13003

Course on “Finance for Non-Finance Executives” (FNFE)

A Management Development Programme

XXIII Weekend Batch of the Course on Finance for Non Finance Executives at Bengaluru Branch (SIRC)

Kind Attention: Members

Members are requested to pass on the information to their Clients.

The course is **open for Non-Finance Executives** such as Engineers, Architects, Doctors, Human Resource Personnel, Department Heads / Administrators / Entrepreneurs and various other professionals, those who are not having adequate knowledge of Accounts / Finance.

The course does not call for any prior knowledge in Accountancy, Finance and Tax Laws. The course coverage will be basic in all subjects.

Date : **9th November 2024 to
21st December 2024**

Course Fees :
Rs. 20,000/- Plus GST

Venue : **ICAI Bhawan
S. Narayanan Auditorium
Vasanthnagar, Bengaluru**

Mode of Payment:
DD/Cheque in favor of
Bangalore Branch of SIRC of ICAI

Time : **10.00 am to 6.30 pm**

Day : **Full Day only on Saturday** Contact : **080 43944876**

No. of Weeks : **07 weekend Saturday's**

For any Assistance
e-mail: **blrprogrammes@icai.org**

Tea Break : **15 mins.**

Lunch : **2.00 pm to 2.30 pm**

Register at **www.bangaloreicai.org**



THE INSTITUTE OF CHARTERED ACCOUNTANTS OF INDIA
(Set up by an Act of Parliament)



ICAI Proudly Presents

WORLD FORUM OF ACCOUNTANTS



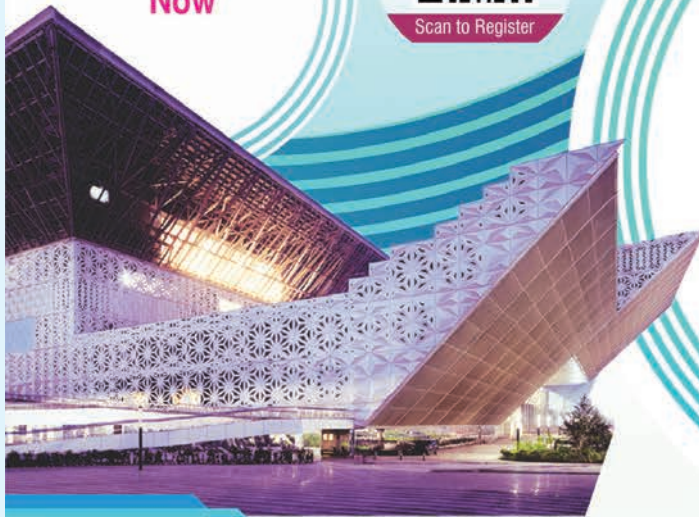
WORLD FORUM OF ACCOUNTANTS | 31ST JAN - 2ND FEB 2025
YASHOBHOOMI, NEW DELHI

Accountability Meets Innovation (AI): For A Sustainable Planet

Avail Early
Bird Discount
Now



Scan to Register



About the Event

The World Forum of Accountants, a unique event where the brightest minds in the accounting and finance profession from across the world will come together to exchange insights, explore emerging trends, and unlock new possibilities for the profession.

KEY HIGHLIGHTS

- ✓ Insights on global practice and future trends with thought-provoking sessions
- ✓ Informative and practical sessions
- ✓ Global networking with peers across the Globe
- ✓ Cultural exchanges

WHO SHOULD ATTEND

- ✓ Professional Accountants in Practice, Business & Industry
- ✓ Global CEOs/CFOs/CXOs, Academicians
- ✓ Standard Setters Economists
- ✓ Regulators

For more details, visit: <https://www.wofa.icaai.org/>

Study Circle Meetings



CA. Jaideep Trasi



CA. Mohan R Lavi



CA. Vikas Oswal

Few Snapshots of Career Counselling Programs



Government First Grade College - Doddabalpur



Government First Grade College - Hebbur



Government First Grade College - Vemgal



Government First Grade College for Women - Holenarspur



Sri H D Devegowda Government First Grade College - Paduvalahippe

Ayudha Pooja



1st Batch Certificate Course in AI – Level-1



CA. Anand Prakash Jangid



CA. Narasimhan E



CA. Ramanujam

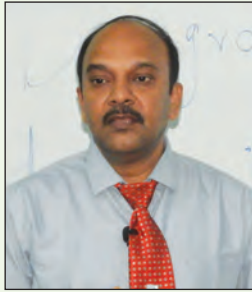


Participants

Certificate Course in AI – Level-1, This Course is specially for Members in Industry



CA. Narasimhan E



CA. Vijay Srinivas Kothapalli



CA. Anand Prakash Jangid



Participants

Seminar on Important Aspects on Transfer Pricing



Inauguration of the Seminar by Lighting the lamp



Participants



CA. Lalit Attal



CA. Narendra J Jain



CA. Sugandha Dutt Giri



CA. Umesh Rao