

GST Annual Return and Reconciliation Statement – Form GSTR 9 & 9C



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Annual return – An Introduction

Persons required • Persons NOT required to file

to file

- Regular RegisteredPerson GSTR-9
- Composition TaxablePerson GSTR-9A
- E. CommerceOperator (GST-TCS) –GSTR-9B

- ➤ Input Service Distributor
- > Casual Taxable Person
- ➤ Non-Resident Taxable Person
- > Person required for Deduct/ Collect Tax as Source
- ➤ Dept of CG/SG/LA whose BoA are subject to audit by the CAG or an auditor appointed for auditing the accounts of LA
- ➤ Suppling OIDAR Service from Outside India to India Noti. No. 30/2019 CT Dtd 28th June, 2019
- Late Fee Rs. 100 per day, maximum 0.25% of T/o in State Each under CGST & SGST
- All GSTR-1 and GSTR-3B up to March 2023 to be filed before filing Annual return for year ending March 2023.

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

Due Date for GST Annual Return and Reconciliation Statement

 The due date to file GSTR-9 & GSTR-9C for a financial year is 31st of December of the year following the relevant financial year.

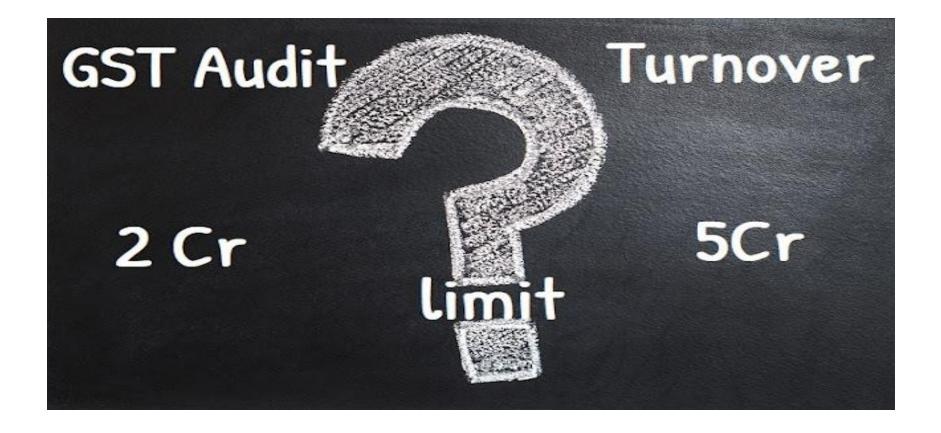


 Thus, the due date to file GSTR-9 & GSTR-9C for FY 2022-23 is 31st December 2023.

Turnover Limit



GST Annual Return and Reconciliation Statement for the F.Y. 2022-23



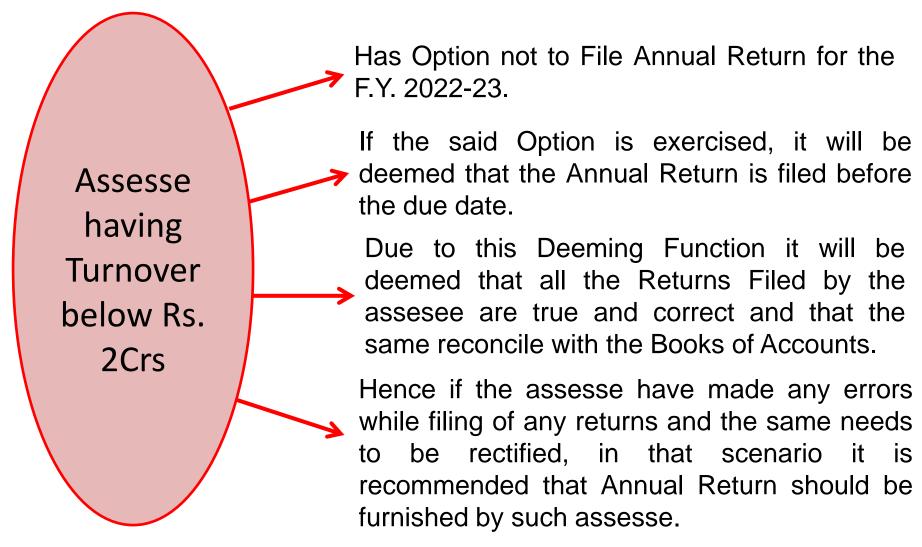
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Notification No. 32/2023- Central Tax dated 31st July, 2023 exempts the registered person whose aggregate turnover in the financial year 2022-23 is up to two crore rupees, from filing annual return for the said financial year.

Aggregate Turnover	GSTR-9	GSTR-9C
Less than 2 crore	Optional	Not applicable
2 crore – 5 crore	Mandatory	Not applicable
More than 5 crore	Mandatory	Mandatory

Option to File Annual Return – N No. 32/2023 Central Tax Dated 31st July 2023.



Aggregate Turnover [Section 2(6)]

"Aggregate turnover" 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.

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Turnover Press Release Dt. 3rd July, 2019

- The turnover of all the registrations having the same PAN is to be used for determining the requirement of filing of reconciliation statement.
- Therefore, if there are two registrations in two different States on the same PAN, say State A (with turnover of Rs. 1.2 Crore) and State B (with turnover of Rs. 1 Crore)
- they are both required to file Annual Return individually for their registrations
- since their aggregate turnover is greater than Rs. 2 Crore.



Aggregate Turnover

Sr. No.	State	Aggregate Turnover
1	Maharashtra	1.75 Cr.
2	Gujarat	1.50 Cr.
3	Tamil Nadu	1.25 Cr.
4	MP	1 Cr.
5	Delhi	Nil
6	Total Turnover	5.50 Cr.

Out of Rs. 1.75 Cr. In Maharashtra, Rs. 75 lakhs was branch transfer from Maharashtra to Gujarat

Aggregate Turnover



- Dealer of Second Hand Goods
- Air Travel Agent
- Forex Dealer
- Life Insurance
- Pure Agent –
 Reimbursement
- Sale of Capital Goods
- Interest on Loan
- Bad debts recovery
- Rent of Residential Property

- Share of Profit from firm
- Share Trading
- High Seas Sales
- Bond Transfer
- Out and Out sale
- Sale of Land
- Remuneration to Non Executive Director
- Goods sent to Job worker not returned within prescribed time
- Cash Basis



Primary Data Source





GSTR-9 – A Glimpse



Part	Table	Particulars Required
Part-I	Table 1 -3	Basic Information
Part-II	Table 4 – 5	Liability
Part-III	Table 6 – 8	Input Tax Credit
Part-IV	Table 9	Tax Paid
Part-V	Table 10 - 13	Adjustments
Part-VI	Table 15 - 19	Other Information

Pt. II	Details of Outward and inward supplies made during the financial year						
				(Amount	in Rs. in all	tables)	
	Nature of Supplies		Taxable Value	Central Tax	State/UT Tax	Integrated Tax	Cess
4	Details of advances, inward and out is payable	tw	ard supplies mad Exempt su				
A Liabil	Supplies made to un-registered persons (B2C) ity neither disclosed in 1 nor	All B2C, B2C Large, Interstate, Intrastate including through E commerce operator to be reported as per BoA. Dr./Cr/ Note, Amendments to be adjusted and Net value to be					
	of 22-23 or 23-24 will also be d in the table BCDEI Supplies made to registered persons (B2B)				r BoA. No		
С	Zero rated supply (Export) on payment of tax (except supplies to SEZs)	All exports on payment of IGST as per BoA (Non LUT) (Table 6A-GSTR-1)			UT) (Table		
D	Supply to SEZs on payment of tax		II SEZ Supplies or able 6B– GSTR-1		of IGST as	per <mark>BoA</mark> (N	lon LUT)
E	Deemed Exports		upplies to Merch	•	er? - Deem	ned Exports	s as per

F	Advances on which tax has been paid but invoice has not been issued (not Covered under (A) to (E) above)	Details of Unadjusted advances as per BoA (Table 11A – GSTR-1)
G	Inward supplies on which tax is to be paid on reverse charge basis	Supplies on which 9(3)/5(3) is applicable as per BoA . (Table 3.1(d) – GSTR-3B) Does not Include Import of
Н		ount disclosed in Table 4G is net of it/Credit Notes and Advances.
1	Credit Notes issued in respect of transactions specified in (B) to (E) above (-)	Cr. Note for B2B, Zero Rated, Deemed Exports as per BoA to be included.(Table 9B –GSTR-1).Doesn't include refund vouchers for advance
J	Debit Notes issued in respect of transactions specified in (B) to (E) above (+)	Dr. Note for B2B, Zero Rated, Deemed Exports as per BoA to be included. (Table 9B – GSTR-1).
K	Supplies / tax declared through Amendments (+)	Table 4B to E could be disclosed net of 4I to L
L	Supplies / tax reduced through Amendments (-)	in case there was any difficulty in reporting such details separately up to FY 2020-21.
М	Sub-total (I to L above)	However, the same exemption is not available
N	Supplies and advances on which tax is to be paid (H + M) above	for the FY 2021-22 and also for 2022-23 – N. No. 14/2022 CT 05.07.22

Reporting of Reverse Charge Figures (Press Release dated 03/07/19)

- Many taxpayers have requested for clarification on the appropriate column or table in which tax which was to be paid on reverse charge basis for the FY 2017-18 but was paid during FY 2018-19.
- It may be noted that since the payment was made during FY 2018-19, the input tax credit on such payment of tax would have been availed in FY 2018-19 only.
- Therefore, such details will not be declared in the annual return for the FY 2017-18 and will be declared in the annual return for FY 2018-19.
- If there are any variations in the calculation of turnover on account of this adjustment, the same may be reported with reasons in the reconciliation statement (FORM GSTR-9C).

5	Details of Outward supplies mad not payable	le during the financial year on which tax is
А	Zero rated supply (Export) without payment of tax	All Exports without payment of IGST as per BoA (LUT) (Table 6A— GSTR-1)
В	Supply to SEZs without payment of tax	All SEZ Supplies without payment of IGST as per BoA (LUT) (Table 6B– GSTR-1)
С	Supplies on which tax is to be paid by the recipient on reverse charge basis	Supplies on which 9(3)/5(3) is applicable to recipient as per BoA (Table 4B– GSTR-1)
D	Exempted	For FY 2022-23, the registered person shall report Non-GST supply (5F) separately and
E	Nil Rated	shall have an option to either separately report his supplies as exempted and nil rated
F	Non-GST supply (includes 'no supply')	supply or report consolidated information for these two heads in the "exempted" row only. – N. No. 38/2023 CT 04.08.23
G	Sub-total (A to F above)	

Н	Credit Notes issued in respect of transactions specified in A to F above (-)	Cr. Note for Zero Rated, RCM as per BoA to be included.(Table 9B –GSTR-1).
I	Debit Notes issued in respect of transactions specified in A to F above (+)	Dr. Note for Zero Rated, RCM as per BoA to be included. (Table 9B – GSTR-1).
J	Supplies declared through Amendments (+)	Amendments for Zero Rated, RCM as
K	Supplies reduced through Amendments (-)	per BoA to be included (Table 9A, 9C – GSTR-1)
L	Sub-Total (H to K above)	
M	Turnover on which tax is not to be paid (G + L above)	Table 5A to F can be disclosed net of 5H to K in case there is any difficulty in
N	Total Turnover (including advances) (4N + 5M - 4G above)	reporting such details separately – N. No. 14/2022 CT 05.07.22

Pt. III	Details of ITC for the financial year					
	Description	Type	Central Tax	State/UT Tax	Integrated Tax	Cess
6	Details of ITC availed during the financial year					
Α	Total amount of input tax credit availed through FORM GSTR-3B (sum total of Table 4A of FORM GSTR-3B) Auto Populated from Table 4A GSTR-3B of F.Y. 22-23 (No amendment allowed)			e 4A of		
В	Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)	Inputs Capital Goods Input Services	basis of Supplier	tax Invoid	oplies clai ce issued as per GS TR-3B)	by
С	Inward supplies received from unregistered persons liable to reverse charge (other than B above) on which tax is paid & ITC availed	Capita Goods Input Services	consol and i Howev	idated an nput serv er, capita	tion to dis nount of i rices in in I goods h	inputs puts. ave to

D	D Inward supplies received from registered persons liable to reverse charge (other than B above) on which tax is paid and ITC availed Input Services			er vailed	
С	Import of goods (including supplies from SEZs) 5D & E have option to disclose onsolidated amount of inputs and input services in inputs. Iowever, capital goods have to be disclosed separately.	per GS1	ITC taken on BoE for IGST paid on Import of goods (incl. from SEZ) and availed as per GSTR-3B (Table 4(A)1 – GSTR-3B). en for IGST paid on Import of service and availed as TR-3B (Table 4(A)2 – GSTR-3B) en on credit distributed by ISD and availed as per		
Н	Amount of ITC reclaimed (other than B above) under the provisions of the Act	180 day availme and rec	laimed as per GSTR-3B (eg. Invoice value paid vs, Credit reclaimed under Rule 42, etc.). Origi ent to be shown in 6B above, reversal in 7A be laim amount to be shown here. This value no uded in 6B above	inal elow	
J	Sub-total (B to H above) Difference (I - A above)				

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

7	Details of ITC Reversed and Ineligible ITC for the financial year			
Α	As per Rule 37	ITC Reversal of credit on non-payment of Invoice in 180 days. If not reversed than?		
В	As per Rule 39	Reversal of credit on account of excess distribution of credit by ISD		
С	As per Rule 42	ITC reversal of Inputs and Input Service attributable to Exempt/Non Business		
D	As per Rule 43	ITC reversal of Capital Goods attributable to Exempt/Non Business		
E	As per section 17(5)	If credit taken and later reversed u/s 17(5). No disclosure of Table 4D of GSTR-3B		
F	Reversal of TRAN-I credit	Transitional Credit reversed thru Table 4B of GSTR-3B. Whether Tran Credit reversal thru GST DRC-03 to be		
G	Reversal of TRAN-II credit	disclosed here?		
Н	Other reversals (pl. specify)	Credit reversal for switch to Composition / Supply become Exempt (ITC-03), etc.		
1	Total ITC Reversed (Sum of A to H above)	7A to E Have option to disclose		
J	Net ITC Available for Utilization (60 - 71)	consolidated amount in 7H – N. No. 14/2022 CT 05.07.22		

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8	Other ITC related information	CM
A	ITC as per GSTR-2A (Table 3 & 5 thereof)	GSTR2A Generated Auto Populated
В	ITC as per sum total of 6(B) and 6(H) above	Total from previous table
С	ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) received during 2022-23 but availed during April 2023 to October 2023 in returns filed up to 30 th November 2023	
D	Difference [A-(B+C)]	Difference can be negative if ITC as per GSTR-3B is more than GSTR-2A. Negative values are allowed, but Dept. is issuing notice against the same for reversal of excess ITC
E	ITC available but not availed	ITC not taken in GSTR-3B - which is liable to be lapsed
F	ITC available but ineligible	ITC not taken in GSTR-3B since ineligible – Eg. 17(5)

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G	IGST paid on import of goods (including supplies from SEZ)	IGST paid as per BoE for Imports and clearance from SEZ to DTA
Н	IGST credit availed on import of goods (as per 6(E) above)	ITC taken on BoE for IGST paid on Import of goods (incl. from SEZ) and availed as per GSTR-3B (Table 4(A)1 – GSTR-3B)
I	Difference (G-H)	Difference may be on account of IGST paid but goods not cleared from Bonded Warehouse by 31st March 2023?
J	ITC available but not availed on import of goods (Equal to I)	Whether above credit will be lapsed?
K	Total ITC to be lapsed in current financial year (E + F + J)	Only for information purpose, will not impact input credit ledger but may lead to scrutiny

Pt. IV	Details of tax	c paid as do	eclared in re	turns filed o	during t	he fin	nancial yea	
9	Description	Tax Payable	Paid through cash	Paid throug	h ITC	ax	Integrated Tax	Cess
	Integrated Tax			figures zed As				
	Central Tax		Tab	le 6.1	of	•		
	State/UT Tax		Forn	n GSTR-	3B			
	Cess			\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\				
	Interest						*	
	Late Fee			What a amour		_		
	Penalty				n GST		_	
	Other				\ \			

Particulars of transactions for the previous financial year but paid in the FORM GSTR-3B of April, 2023 to October, 2023 filed upto 30th November, 2023

NN 38/2023 dated 4th August 2023

Pt. V	Particulars of transactions for the financial declared in returning the next financial year till the specified period						
10	Supplies / tax declared through Amendments (+) (net of debit notes)	For FY 2022-23, details of additions or amendments to any of the supplies already declared in the returns of the previous financial					
11	Supplies / tax reduced through Amendments (-) (net of credit notes)	year but such amendments were furnished in Table 9A, Table 9B and Table 9C of FORM GSTR-1 of April, 2023 to October, 2023 filed upto 30th November, 2023 shall be declared here. To disclose RCM liability of 22-23 paid in 23-24?					
12	Reversal of ITC availed during previous financial year	For FY 2022-23, aggregate value of reversal of ITC which was availed in the previous financial year but reversed in returns filed for the months of April, 2023 to October, 2023 filed upto 30th November, 2023 shall be declared here. Table 4(B) of FORM GSTR-3B may be used for filling up these details.					



NN 38/2023 dated 4th August 2023

Pt. V	Particulars of transactions for the finar declared in returns of the next financial year till the specified period					
13	ITC availed for the previous financial year	For FY 2022-23, details of ITC for goods or services received in the previous financial year but ITC for the same was availed in returns filed for the months of April, 2023 to October, 2023 filed upto 30th November, 2023 shall be declared here. Table 4(A) of FORM GSTR-3B may be used for filling up these details. However, any ITC which was reversed in the FY 2022- 23 as per second proviso to sub-section (2) of section 16 but was reclaimed in FY 2023-24, the details of such ITC reclaimed shall be furnished in the annual return for FY 2023-24.				



14	Differential tax paid on account of declaration in 10 & 11 above							
	Description	Payable	Paid					
	Integrated Tax							
	Central Tax							
	State/UT Tax	s per Table 6.1						
		f Form GSTR-						
	Interest	3B						

Pt. VI	Other Informati	on						jVk
15	Particulars of De	Particulars of Demands and Refunds Option not					able 15 – 05.07.22	
	Details	Central Tax	State/UT Tax	Integrated Tax	Cess	Interest	Penalty	Late Fee/ Others
А	Total Refund Claimed	Refer Form	Refer Form RFD-01/01A					
В	Total Refund Sanctioned		Refer Form RFD-06 Provisional sanctioned?					
С	Total Refund Rejected	Refer Form RFD-06						
D	Total Refund Pending							
Е	Total demand of taxes	Check online GTST Portal also for any demand notice, which are pending						
F	Total taxes paid in respect of E Above	Details of Accepted demand, which is already paid						
G	Total demands Pending out of E Above	Unpaid dei Unaccepta		ive demand	– Whethe	er Appeal is	filed?	

Taxpayers are advised to declare all such data / details (which are not part of their regular statement/returns) to the best of their knowledge and records. This data is only for information purposes and reasonable/explainable variations in the information reported in these tables will not be viewed adversely. – Press Release Dt. 3-7-19

Option not to fill Table 16 – N. No. 14/2022 CT 05.07.22

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

17	HSN Wise Summary of outward supplies							
HSN	UQC	Total quantity	Taxable Value	Rate of Tax	Central Tax	State/UT Tax	Integrated Tax	Cess
	Data can be taken from Table 12 of GS1. To be reported Net of Sales returns. UQC applicable only for Goods. Match with 10 + 11							
	6 digit HSN reporting for registered persons hav. Crores. 4 digit HSN reporting for registered persons Crores. Crores. Crores. Crores. Crores. Table 17 was optional up to FY 2020-21. However it is compulsory for the FY 2022-23							
18	HSN Wi	se Summar	y of Inwa	rd suppli		inpulsor, i	TOT THE T I E	
HSN	UQC	Total quantity	Taxable Value	Rate of Tax	Cen. Tax	State/UT	Integrated Tax	Cess
	1	d supply of to be report	•				fill Table 18 2 CT 05.07.2	
19	Late fee payable and Paid				Payabie		Pala	
А	Central Tax						-	
B 07.10.	B State Tax 07.10.2023 CA Gadia Manish R 32							

Additional information Required

- Bifurcation of zero rated supplies between actual exports and SEZ supplies
- ITC needs to be bifurcated into Input, Input services and Capital Goods
- Bifurcation of ITC on inward supplies liable to reverse charge mechanism, received from registered and unregistered suppliers
- ITC reconciliation with GSTR-2A [including 'ITC available but not availed' and 'ITC available but ineligible']
- Particulars of the transactions for the previous FY declared in returns of April to October of current FY (filed up to 30th November) – Amendments, Reversal of ITC and ITC availed for the previous FY
- HSN wise details of Outward and Inward supplies (10%) made
- Details of goods purchased from composition tax payer, goods sent for job work, goods sent on approval
- Details of refund claimed, sanctioned, rejected and pending details

Precautions while filing GSTR 9

TABLE 4 & 5

- Other taxable incomes & sale of fixed assets to be verified properly.
- Ensure there is no supply of goods / services exceeding value Rs. 50,000/ in a financial year by employer to employee (Schedule I) (Gifts to employees in kind).
- Reconciliation of E-invoices generated for F.Y. 2022-23.
- Reconciliation of E-way bill in case of supply of goods.
- Credit notes issued beyond the time limit of Sec 16(4), to be reported properly.

TABLE 6

- Consolidated reporting of Net ITC at the time of filing GSTR-3B, thus, separate reversal is not made at the time of filing GSTR-3B.
- No rows available to report previous year ITC claimed in current year. This
 may leads to notices.

Precautions while filing GSTR 9

TABLE 7

 Reversal as per Section 17(5) to be disclosed only when actual reversal has been made. Amount only disclosed as ineligible in Table 4D of GSTR 3B is not to be reported.

TABLE 8

- The figures generated in Table 8A & extracted GSTR 2A does not match.
 Prepare a reconciliation to the extent possible.
- If the ITC pertaining to the previous FY is reported in Table 6 of GSTR 9, it will lead to negative figures in Table 8 of GSTR 9 as the GSTR 2A figure auto-populated in Table 8A contains ITC pertaining to the current FY only.

TABLE 9

• Any amendments pertaining to the previous FY made in the current FY leads to either short or excess paid in Table 9 of GSTR 9. Prepare a reconciliation for future reference.

Transaction of Outward Supply of 100 2022-23 where to disclose

Nature of Transactions	Reported / Di filing returns	Not Reported	
	During F.Y. 2022 – 23	During April to Oct of FY 2023- 24	•
Outward Taxable Supplies	Table 4	Table 10 / 11	Table 4
Amendment in Outward taxable Supplies	Table 4K / 4L	Table 10 / 11	Table 4K / 4L
Outward non-taxable Supplies	Table 5	Table 10 / 11	Table 5
Amendment in Outward non-taxable Supplies	Table 5J / 5K	Table 10 /11	Table 5J / 5K
Inward Supplies – RCM	Table 4G		

Disclosure of Transactions Outward Supply

G	W	4

Nature of Transaction	Transactions of FY 2022 - 2023 reported in		Reported in for April 202 2024	Disclosure in Annual Return	
	GSTR-1	GSTR-3B	GSTR-1	GSTR-3B	GSTR-9
Outward Supplies	Yes	Yes	No	No	Table 4 / 5
Outward Supplies	Yes	No	No	Yes	Table 10 / 11
Outward Supplies	No	Yes	Yes	No	Table 4 / 5
Outward Supplies	No	No	Yes	Yes	Table 10 / 11
Outward Supplies	No	No	No	No	Table 4 / 5

Transactions of FY 2022 – 2023 - amendment not done while filing return in succeeding year.

Nature of Transaction	Reporting in Financial Statement	Reported in GSTR-1	Reported in GSTR-3B	Reporting in GSTR-9
Outward Supplies	100,000	100,000	100,000	Table 4 or Table 5
Outward Supplies	100,000	90,000	100,000	Edit figures Table 4 or 5
Outward Supplies	100,000	100,000	90,000	Table 9, Tax liability to enhance and discharge through DRC – 03
Outward Supplies	90,000	100,000	100,000	No Reporting Claim Refund – Press Release dated 3 rd July 2019

Transactions of FY 2022 – 2023 and amendment done while filing return for April to October 2023

Nature of Transactions	Reporting in	Reported in GSTR –	Reported in GSTR –	Reporting in GSTR - 9	
	Financial	1 of FY	3B of FY		
	Statement	22-23	22-23		
Outward	100,000	90,000	100,000	Table 10 or 11	
Supplies					
Outward	100,000	100,000	90,000	Reduce Turnover from	
Supplies				Table 4 by INR 10,000	
				and report in Table 10.	
				Tax liability on such	
				transaction to be	
				reported at Table 14	

Outward Tax Liability as per GSTR 3B

SN	Particulars	Amount	Amount
1	As per GSTR-3B of FY 2022-23		101,000
1.1	Reported in respect of FY 2021-22 supplies (As per Table 10 of FY 2021-22)	3000	
1.2	Reversed in respect of FY 2021-22 supplies (As per Table 11 of FY 2021-22)	2000	
1.3	Reported in respect of FY 2022-23 supplies	100,000	

Analysis various possibility of outward liability

SN	Particulars	1	2	3	4	5
2	Actual Outward Tax Liability of FY 2022-23	100,000	101,000	99,000	101,000	99,000
2.1	Difference	Nil	1000	-1000	1000	-1000
2.2	Reported/reversed in next F.Y.	NA	Yes	Yes	No	No
2.3	Report in Table 4	100,000	100,000	100,000	101,000	99,000
2.4	Report in Table 10	Nil	1000	Nil	Nil	Nil
2.5	Report in Table 11	Nil	Nil	-1000	Nil	Nil
3	Reconciliation in Table 9					
3.1	Tax payable in Table 9 (Always = 2.3)	100,000	100,000	100,000	101,000	99,000
3.2	Tax paid as per Table 9	101,000	101,000	101,000	101,000	101,000
3.3	Difference (3.1 – 3.2)	-1000	-1000	-1000	0	-2000
3.4	Add - Tax paid w.r.t. Table 10 of GSTR 9 for the FY 2021-22	3000	3000	3000	3000	3000
3.5	Less - Tax reversed w.r.t. Table 11 of GSTR 9 for the FY 2021-22	2000	2000	2000	2000	2000
4	Tax Payable / (Refundable)	Nil	Nil	Nil	1000	-1000



RCM disclosures

Particulars	Tax paid in	Tax paid in	Tax paid in	Reporting	ITC
	FY 21–22	FY 22-23	FY 23-24	in GSTR-9	
Transactions pertaining to FY 2021 – 22	No	Yes	No	FY 22 – 23 Table 4G	FY 2022-23 Table 6C/6D, if paid till Nov 22
Transactions pertaining to FY 2022 – 22	NA	Yes	No	FY 22 – 23 Table 4G	FY 2022-23 Table 6C/6D
Transactions pertaining to FY 2022 – 23	NA	No	Yes	FY 23 – 24 Table 4G	FY 2023-24 Table 6C/6D, if paid till Oct 22
Transactions pertaining to FY 2022 – 23	NA	No	No	In the year of payment Table 4G	No ITC (Sec 16(4)

Disclosure of Transaction of Inward Supplies

Particulars of supplies	Reported in	Reporting in	
	GSTR-3B	GSTR – 9	
Recorded in books of	FY 2022 – 23	Table 6	
accounts of FY 2022 – 23			
Recorded in books of	April 23 to	Table 8C and	
accounts of FY 2022 – 23	October 23	Table 13	
Recorded in books of	Not Claimed	No	
accounts of FY 2022 - 23		Reporting	



Excess/Short claim of ITC in GSTR-3B

Particulars	Reversed / Claimed	Disclosure / Action
Excess Claim	Not reversed	Pay through DRC-03
Excess Claim	April to Oct 2023	Table 12 of GSTR - 9 of FY 2022 - 2023
Short Claim	April to Oct 2023	Table 8C and Table 13 of GSTR - 9 of FY 2022 - 2023
Short Claim	Not claimed	ITC will not be available



ITC claimed in GSTR3B

SN	Particulars	Amount	Amount
1	As per GSTR-3B of FY 2022-23		101,000
1.1	ITC Reversed of supplies of FY 2021- 22	2000	
1.2	ITC Claimed of supplies of FY 2021-22	3000	
1.3	ITC Claimed of supplies of FY 2022-23	1,00,000	

Analysis various possibility of ITC

SN	Particulars	1	2	3	4	5
2	Actual eligible ITC for FY 2022-23 as per books	100,000	101,000	99,000	101,000	99,000
2.1	Difference	Nil	1000	-1000	1000	-1000
2.2	Reported/Reversed in next F.Y.	NA	Yes	Yes	No	No
2.3	Report in Table 6	100,000	100,000	100,000	100,000	99,000
2.4	Report in Table 13	Nil	1000	Nil	Nil	Nil
2.5	Report in Table 12	Nil	Nil	-1000	Nil	Nil
2.6	ITC Lapsed	Nil	Nil	Nil	1000	Nil
3	Reconciliation					
3.1	ITC claimed in GSTR 3B	101,000	101,000	101,000	101,000	101,000
3.2	ITC reported in Table 6 of GSTR 9	100,000	100,000	100,000	100,000	99,000
3.3	Difference	1000	1000	1000	1000	2000
3.4	Add: ITC reversed w.r.t. Table 12 of GSTR 9 for the FY 2021-22	2000	2000	2000	2000	2000
3.5	Less: ITC claimed w.r.t Table 13 of GSTR 9 for the FY 2021-22	3000	3000	3000	3000	3000
4	ITC to be reversed	CA Gadia Mahi	sh R Nil	Nil	Nil	41000





GSTR 9C- Reconciliation Statement

Who is required to prepare GSTR 9C – Reconciliation Statement?

Every registered person, other than those referred to in the second proviso to section 44, an 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 which include a self-certified reconciliation statement, reconciling the value of superfection declared in the return furnished for the financial year, with the audited in financial statement for every financial year electronically, within such the in such form and in such manner as may be prescribed

What is the turnover limit for GSTR 9

"Every registered person, whose agg exceeds five crore rupees, shall als statement as specified under section annual return referred to in sub-rule (1), on or before the thirty-first day of December following the end of such financial year, electronically through the common portal either directly or through a Facilitation Centre notified by the Commissioner".

RTP Supplying OIDAR Service from

Outside India to India is not require to



History of Form GSTR 9C

- Form GSTR 9C underwent a major change in 2021. Earlier, it required
 the audit of the books of accounts and records by a chartered
 accountant or a cost accountant and their certification.
- With the introduction of the Finance Act 2021, the requirement of GST Audit and submission of GSTR 9C, certified by a CA/CMA was removed.
- However, the GST Council, in its 43rd
 GST Council Meeting that was held
 on 28th May 2021, recommended that GSTR 9C may still be selfcertified and submitted by the taxpayers.
- The CBIC notified this change in Notification No. 29/2021 Central Tax, dated 30th July 2021.

GST Reconciliation Statement - Meaning



- GSTR 9C is the reconciliation between the figures reported in the GST returns and the figures reflected in the Financial Statements. It is an examination of records, returns and other documents.
- Those records, returns and documents might have been maintained or furnished under GST Law or any other law
- The reconciliation is prepared to verify the correctness of:
- > Turnover declared
- > Taxes paid
- Refund claimed; and
- Input tax credit availed
- The reconciliation is also to assess auditee's compliance with the provisions of GST Act and Rules.



GSTR-9C – A Glimpse



Parts	Particulars Required
	PART A – Reconciliation Statement
Part-I	Basic Details
Part-II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)
Part-III	Reconciliation of tax paid
Part-IV	Reconciliation of Input Tax Credit (ITC)
Part-V	Additional Liability due to non-reconciliation

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

Books of accounts are require to be Audited under any other statute

Yes

No

Financial need not be audited again under GST.
Only Reconciliation statement to be prepared

Financial need to be audited along with certification of Reconciliation statement

Pt. II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9) Statutory Audit				
5	Reconciliation of Gross Turnover		report GSTIN wise?		
Α	Turnover (including exports) as per audited fin statements for the State / UT (For multi-GSTIN under same PAN the turnover shall be derived the audited Annual Financial Statement)	rurnover as per the audited Annual Financial Statement shall be declared here. For Multiple GSTIN entity, internally derive GSTIN wise turnover.			
В	Unbilled revenue at the beginning of Financial Year (Rent Income, WCT, Accrued Interest)	(+)	Unbilled revenue in the BoA (accrual system) in the last F.Y. & was c/f to the current F.Y. shall be declared here		
С	Unadjusted advances at the end of the Financial Year	(+)	Advances on which GST has been paid but revenue not recognized AFS		
D	Deemed Supply under Schedule I	(+)	Deemed supply if already part of the T/o AFS not required to be included here.		
E	Credit Notes issued after the end of the financial year but reflected in the annual return	(-)	GST Credit notes issued between April to Oct 2022		
F	Trade Discounts accounted for in the audited Annual Financial Statement but are not permissible under GST	(+)	Commercial Discount (Non GST) to be disclosed here (if value of CN is reducing T/o in AFS		
G	Turnover from April 2017 to June 2017	(-)	NA for FY 2021-22		
0	07 ¹ .10.2023 CA Gadia Manish R 54				

Н	Unbilled revenue at the end of Financial Year	(-)	Unbilled revenue in the BoA (accrual system) in the current
I	Unadjusted Advances at the beginning of the Financial Year	(-)	Advances on which GST has been paid but revenue not recognized AFS
J	Credit notes accounted for in the audited Annual Financial Statement but are not permissible under GST	(+)	Commercial Credit notes (Non GST) to be disclosed here (if value of CN is reducing T/o in AFS
K	Adjustments on account of supply of goods by SEZ units to DTA Units	(-)	Filled by SEZ Unit which is supplying to DTA (DTA to pay under Import)
L	Turnover for the period under composition scheme	(-)	
M	Adjustments in turnover under section 15 and rules thereunder	(+/-)	Related party Transaction, Branch Transfer, Sch I, ATA, Forex Dealer
N	Adjustments in turnover due to foreign exchange fluctuations	(+/-)	
0	Adjustments in turnover due to reasons not listed above	(+/-)	Eg: Cash Basis accounting, Construction, Sale of capital goods etc
Р	Annual turnover after adjustments as above		Table 5B to 5N option has been given to make
Q	Turnover as declared in Annual Return (GSTR9)		adjustment in Table 50 – N. No. 14/2022 CT
R	Un-Reconciled turnover (Q - P) CA Gadia I	Manish R	05.07.22 55

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Pt. II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)			
6	Reasons for Un - Reconciled difference in Annual Gross Turnover			
Α	Reason 1			
В	Reason 2			
С	Reason 3			

Pt.	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)			
7	Reconciliation of Taxable Turnover Where	e to disclose Shares transaction?		
A	Annual turnover after adjustments (from 5P above)			
В	Value of Exempted, Nil Rated, Non-GST supplies, No-Supply turnover	Schedule III, Liquor, Petroleum, etc.		
С	Zero rated supplies without payment of tax	Zero rated supplied under Bond/LUT		
D	Supplies on which tax is to be paid by the recipient on reverse charge Basis	Lawyer giving services to business entity having t/o below 20 lacs – Whether lawyer to report in 7B or 7D		
E	Taxable turnover as per adjustments above (A-B-C-D)			
F	Taxable turnover as per liability declared in Annual Return (GSTR9)			
G	Unreconciled taxable turnover (F-E)			



Pt II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR9)		
8	Reasons for Un - Reconciled difference in taxable turnover		
Α	Reason 1		
В	Reason 2		
С	Reason 3		



Pt.	Reconciliation of tax paid					
9	Reconciliation	on of rate wise	liability and	l amount payab	le thereon	
				Tax Pa	yable	
	Description	Tax Value	CGST	SGST/UTGST	IGST	CESS
Α	5%					
В	5% (RC)		Check	k and report (on	
С	12%		Classification, Place of			
D	12% (RC)		Supply, Valuation, Time of			
E	18%		S	Supply, etc.		
F	18% (RC)					
G	28%	After pt. (B) 6% inserted				
Н	28% (RC)	as per NN 38/2023				
07	dated 04 th August 2023.					

	Description	Taxable Value	CGST	SGST/UTGST	IGST	CESS
I	3%					
J	0.25%					
K	0.10%					
L	Interest					
M	Late Fee					
N	Penalty					
0	Others					
Р	Total amount to be paid as per tables Above					
Q	Total amount paid as declared in Annual Return (GSTR9)					
R	Unreconciled payment of amount (Q-P)					



Pt. III	Reconciliation of tax paid		
10	Reasons for un-reconciled payment of amount		
А	Reason 1		
В	Reason 2		
С	Reason 3		

11	Additional amount payable but not paid (due to reasons specified under Tables 6,8						
	and 10 above)	and 10 above)					
				To be paid th	rough Cash		
	Description	Taxable Value	CGST	SGST/UTGST	IGST	CESS	
	5%						
	12%						
	18%						
	28%						
	3%						
	0.25%	A C1	, (D) co				
	0.10%			% inserted			
	Interest		per NN 3				
	Late Fee	dated 04 th August 2023.					
	Penalty						
	Others (please specify)						

Pt.	Reconciliation of Input Tax Credit (ITC)			
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 BOA)	ITC availed (after reversals) as per the AFS shall be declared here. For Multiple GSTIN entity, internally derive GSTIN wise ITC		
В	ITC booked in earlier Financial Years (+) claimed in current Financial Year	ITC booked in the AFS of earlier F.Y. but availed in the ITC ledger in the current F.Y.		
С	ITC booked in current Financial Year to be claimed in subsequent Financial Years	Table 12B & 12C was optional up to FY 2020-21. However it is compulsory for the FY 2021-22		
D	ITC availed as per audited financial statements or books of account	onwards		
E	ITC claimed in Annual Return (GSTR9)	As per Table 7J of GSTR-9 (Figures are Net of Reversal)		
F	Un-reconciled ITC (E-D)			

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Pt IV	Reconciliation of Input Tax Credit (ITC)		
13	Reasons for un-reconciled difference in ITC		
Α	Reason 1		
В	Reason 2		
С	Reason 3		

14.	Description	Value	Amount of Total ITC	Amount of eligible ITC availed		
	1	2	3	4		
Α	Purchases	The various	sub-heads specif	ied under this		
В	Freight / Carriage		table are general expenses in the audited Annual Financial Statement or books of account on which ITC may or may not be			
С	Power and Fuel					
D	Imported goods (Including received from SEZs)	available. Further, this is only an indicative list of heads under which expenses are				
E	Rent and Insurance	generally booked. Taxpayers may add or				
F	Goods lost, stolen, destroyed, written off or disposed of by way of gift or free samples	delete any of these heads but all heads of expenses on which GST has been paid / was payable are to be declared here.				
G	Royalties	Only those	expenses are to b	e reconciled		
Н	Employees' Cost (Salaries, wages, Bonus etc.)	where input tax credit has been availed. Press Release Dt. 3 rd July, 2019				

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	1	2	3	4
I	Conveyance charges			
J	Bank Charges			
K	Entertainment charges			
L	Stationery Expenses (including postage etc.)			
М	Repair and Maintenance			
N	Other Miscellaneous expenses			
0	Capital goods			
Р	Any other expense 1			
Q	Any other expense 2			

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

Table 14 is optional for FY 2021-22 – N. No. 14/2022 CT 05.07.22



Pt IV	Reconciliation of Input Tax Credit (ITC)			
15	Reasons for u	un-reconciled difference in ITC		
Α	Reason 1	+ Ineligible ITC availed by the Registered person		
В	Reason 2	+ ITC booked in the books of accounts but not availed including ineligible ITC not availed (lapsed)		
С	Reason 3	- ITC booked in the books of accounts but availed in return GSTR 3B of the subsequent year. This can be correlated with point 13 of GSTR 9 or vice-versa.		

GMJ

16	Tax payable or and 15 above)	n un-reconciled difference in ITC (due to reasons specified in 13
Sr. No.	Description	Amount Payable
Α	Central Tax	
В	State/UT Tax	
С	Integrated Tax	
D	Cess	
E	Interest	
F	Penalty	

Pt. V	Additional Liabili	ty due to non-reconciliation				
			To be paid through Cash			
Sr. No.	Description	Value	CGST	SGST/UTGST	IGST	CESS
А	5%					
В	12%			Not from ITC		
С	18%					
D	28%					
Е	3%					
F	0.25%					
G	0.10%					
Н	Input Tax Credit					
I	Interest —		How to c	alculate interest?		
J	Late Fee					
К	Penalty					

7		

Pt. V	Additional Liability due to non-reconciliation						
		Only to report additional liability due to non reconciliation? To be paid through Cash					
	Description	Value	CGST	SGST/UTGST	IGST	CESS	
	Any other amount paid for supplies not included in Annual Return (GSTR 9)						
	Erroneous refund to be paid back	Refund cla	 Provisional refund erroneously refunded Refund claimed of blocked credit Year end reversal of ITC under Rule 42 or 43 				
	Outstanding demands to be settled	any order passed which entails requirement of payment of taxes, but which forms a subject matter of appeal before any higher authority cannot be considered as an outstanding demand.					
	Other (Pl. specify)						



Verification

I hereby solemnly affirm and declare that the information given herein above is true and correct and nothing has been concealed there from. I am uploading this self-certified reconciliation statement in FORM GSTR-9C. I am also uploading other statements, as applicable, including pocial statement, profit and loss account and balance sheet etc.

Date:

solemn means "serious or earnest"
affirm means "confirm, establish or ratify".
A solemn affirmation is ratification under a statute.

Whether to check;

- 1. Place of Supply
- 2. Nature of Supply
- Time of Supply
- 4. Rate of tax
- 5. Valuation
- 6. ITC eligibility, etc.

Designation/status

Signatory



POINTS TO BE CONSIDERED WHILE PREPARING GSTR 9 & GSTR 9C





Initial Checks and Techniques

- Ratio analysis
- Sampling
- Documentation
- Reconciliation
- Opinion of Experts, if any
- Any notice received?
- Any Appeal is pending?



List of documents required to be maintained by the RTP

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



Various Reconciliations

- Invoices v/s BOA
- BOA v/s 3B
- BOA v/s GSTR1
- 3B v/s1
- Payment vouchers v/s
 Invoices Unregistered
- Purchase register v/s 2A

- 2A v/s 3B
- Turnover as in GST Returns v/s BOA
- E-way bill Vs GSTR1
- E-way bill vs Sales
- E-way bill vs Purchase
- E-way bill vs non supply



E-way bill in GST

- Stock Transfer
- Dispatch of goods
- Receipt of goods
- Free supply of goods



- Goods sent and received from Job worker
- Some time movement of Goods can be guiding force to determine the service
- Supply of goods to related person
- Goods send on approval



E-way Bill Reconciliation

- Matching of invoices of e-way bills with the sales shown in GSTR-1 will help suppliers in assessing whether the supplies have been accurately shown in sales return and GST paid on the same.
- This will be a significant tool with the GST authorities in curbing tax-evading practices.
- Notices are served by the authorities seeking clarifications for differences in tax amounts and various other discrepancies noticed.
- Any action taken by the tax authorities against the business for non/wrong generation of E-way bill.



Accounts Related Checks

- GSTIN wise Trial Balance and reconciliation with the Balance Sheet has been prepared.
- Stock Records have been maintained
- Tax Invoice, Bill of Supply, Debind Notes, Credit Notes, Receipt Vouches
 Refund Vouchers, Self Invoices etchave been issued and maintained as required as per the Law.



ITC Related Checks

- Reconciliation of ITC taken in GSTR 3B and that reflecting in GSTR 2A/GSTR 2B.
- ITC has been claimed under the correct head of tax i.e. CGST/SGST/IGST.
- Manner of utilization
- Conditions of Section 16(2)
- Reversal of ITC as per Rule 37
- Reversal of ITC as per Rule 42 & 43
- ITC used for personal use
- Disallowance of ineligible credit as per Section 17(5)



General Checks



- Valuation of transactions between Related Party or Distinct Person
- The barter transactions
- Cross Charge
- LUT
- Followed Time of Supply provisions
- GST on Advance received towards services
- Interest is paid on Net/Gross liability
- Place of Supply (Specially in case of Import or Export of Goods or services)
- Bond Transfer/High Sea Sales



Common Challenges Faced While Filing GSTR-9 & GSTR-9C **Return Forms**

Mismatch of ITC Between GSTR 2A and Table 8A of GSTR 9

- Input tax credits have caused a lot of pain to taxpayers due to the mismatch between the input tax credit that appears on the automatically-generated GSTR 2A and the input tax credit that appears on the GSTR 9. There are several reasons as we see here:
- If input tax credit for supplies relating to FY 17-18 is declared after the 30th of April, 2019, it will not be auto-populated in GSTR 9.
- GSTR 9 excludes input tax credits on invoices where the place of supply is the state of the supplier instead of the state of the recipient.
- There are no input tax credit entries in GSTR 9 relating to invoices issued to the recipient taxpayer during the period in which the taxpayer applied for a Composition Scheme.
- After considering amendments, the final figures have been reported in GSTR 9 as compared to the gross figures in GSTR 2A.

ITC Bifurcation Required in GSTR 9 and GSTR 9C

- According to the GSTR 9, all input that includes input service credits, as well as capital goods, must be bifurcated. Additionally, it also requires the taxpayer's financial records to be reviewed carefully by an auditor and thoroughly analyzed.
- Now, when it comes to bifurcation, chances are that most of the taxpayers may not have documented this bifurcation. Consequently, the taxpayers are overburdened with the job of gathering this information to avoid incorrect reporting and its consequences.

GSTR 2A Does not Reflect Claimed Input Tax Credits

 According to the CGST Act, taxpayers filed their GSTR 3B returns for FY 17-18 and claimed input tax credits. There are a few taxpayers whose GSTR 2A does not reflect all input tax credits.

 The taxpayers would be sent notices from the Tax Department informing them that their input tax credit has been deemed ineligible, without being given the opportunity to prove that it is genuine.

ITC Claimed Only in FY 18-19 for Goods Imported in FY 17-18

- Input tax credit claims for goods imported in the previous FY 17-18 are not separately reported at present as there are no separate fields to report them. The government has indicated that such an input tax credit will be reported on table 6(E) of Form GSTR 9 for the availed credit period between July 2017 and March 2019.
- Auditor reconciliation statements are prepared based on the information they receive from the taxpayers. So, had there been separate fields, the taxpayers would have found it easier to report this data separately and more accurately.

Overlapping data in Table 6(B) and 6(H)

- As per Table 6(B), prior to imports and inward supplies otherwise subject to reverse charge, all inward supplies, and input tax credits must be reported. According to table 6(H), input tax credits refunded or reversed within the same financial year must be reported. As a result, tables 6(B) and 6(H) of the GSTR 9 have overlapping figures.
- There have been clarifications and communication from the government to help the taxpayers understand this. Yet, owing to the newness, there is a need for more examples to get a better grip over the subject.



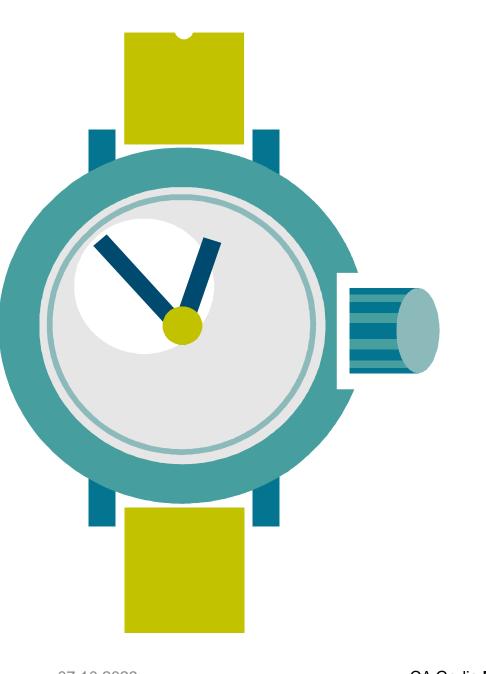
GSTR 9 discloses RCM liability

- There has been some confusion regarding the disclosure of liability under RCM, which is due for FY17-18 but will be paid in FY18-19. The confusion has arisen due to the fact that the press release on 4th June 2019 uses the words 'additional outward supply' without any mention of RCM, but the Central Tax notification released on 28th June 2019 uses words, 'additional liability'.
- Accordingly, taxpayers need to report the total of such an undisclosed liability under table 4(G) of GSTR 9, while the corresponding tax portion must be declared under 'Tax Payable' in table 9.

Other GSTR 9 Issues Not Addressed

- Besides the ones mentioned above, taxpayers have been experiencing other problems while filing their GSTR 9:
- ➤ Negative values can only be copied into tables 5(M), 5(N), and 5(O) of GSTR 9/9C offline utility. Negative values can be copied to another system, and JSON is generated, but GSTN does not handle them.
- It is not reflecting the DRC-03 in the common portal in some cases.
- > The JSON file cannot be uploaded even though there is no error.
- Taxpayers have been unable to file under DRC-03 despite the setoff.
- Another issue is that occasionally, GSTR 9 returns have been filed with multiple final PDF copies.
- It is tedious to split/bifurcate the expense ledger on the GSTR 9C.





Opinions or views are like wrist watches.

Every watch shows different time from others.

But every one believes that their time is right!





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

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