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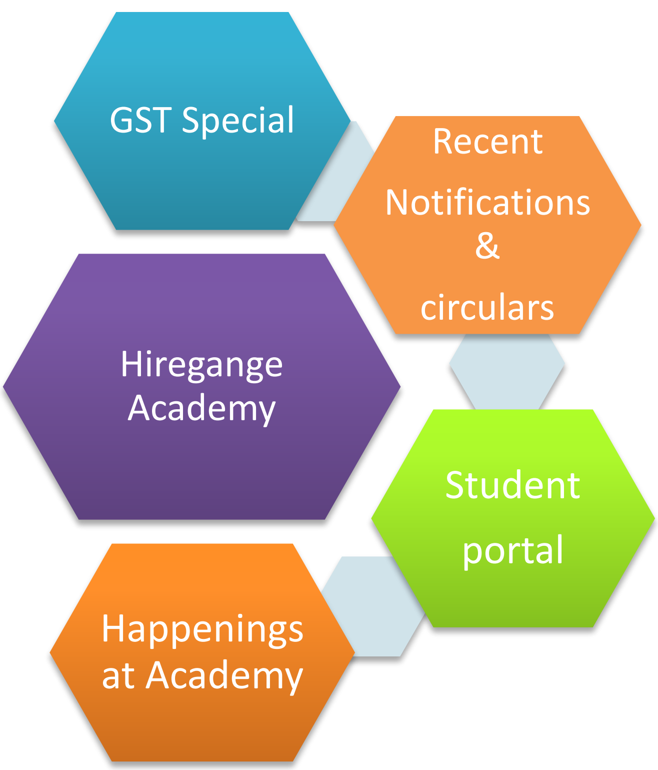

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Time limit for GST ITC on delayed RCM payments

The time limit for claim of ITC of GST paid on procurements for FY 2017-18 ended with the due date of filing the GST returns for the month of October 2018. There is also an alternative argument that the actual date for claim of ITC is the date of filing annual return as the present return GSTR-3B is not a return prescribed in Section 39. The CBIC also issued a press release dated 18th October 2018 stating that the due date of taking ITC would remain due date of filing return for the month of October 2018 for FY 2017-18. There could be few GST payments in the period October 2018 to December 2018 on account of reverse charge liabilities which could get highlighted to tax payers during the course of audit exercise. A brief analysis has been made on eligibility of ITC of such GST paid in this article.

Time limit for ITC claim

In terms of Section 16(4) of CGST Act 2017, a registered person would not be entitled to take input tax credit in respect of any invoice or debit note for supply of goods or services or both after the due date of furnishing of the return under section 39 for the month of September following the end of financial year to which such invoice or invoice relating to such debit note pertains or furnishing of the relevant annual return, whichever is earlier.

Considering that GSTR-3B is a return specified under Section 39, the due date for claim of credit for FY 2017-18 would be 25th October 2018 as the due date was extended to 25th October 2018 this time.

Restriction is with respect to invoice or debit note

Section 16(4) restricts the credit in respect of any invoice or debit note. For GST law, invoice means invoice referred in Section 31 which covers the invoices to be issued on supply of goods or services including those issued for compliance under reverse charge mechanism. Debit note means a document issued by a registered person under sub-section (3) of section 34 in case of short charge of taxable value or tax amount by the registered supplier.

In terms of Rule 36 of CGST Rules, registered person could claim the ITC in respect of following documents:

(a) an invoice issued by supplier of goods or services or both in accordance with the provisions of section 31;
(b) an invoice issued in accordance with the provisions of clause (f) of sub-section (3) of section 31, subject to the payment of tax;
(c) a debit note issued under section 34;
(d) a bill of entry or any similar document prescribed under the Customs Act, 1962 or rules made thereunder for the assessment of integrated tax on imports;
(e) an ISD invoice or ISD credit note or any document issued by an Input Service Distributor.

Based on the above list, bill of entry is also one of the specified documents for claiming ITC which is not covered under Section 16(4) for restriction of time limit. Therefore, if any credits are missed out on any bill of entries, assessee could take calculated risk based on the interpretation that time limit is not applicable on bill of entries.

Invoice in case of RCM payments

Section 31(3) (f) warrants a registered person who is liable to pay tax under reverse charge mechanism under Section 9(3) or 9(4) to issue an invoice in respect of goods or services or both received by him from an unregistered supplier as on the date of receipt of goods or services or both. This is generally known as self-invoice for claiming ITC.

Though there is a specific provision provided in Section 12 and Section 13 to determine the time of supply in case of reverse charge payments, there is no specific provision providing for time limit for issue of invoice for payments made under reverse charge mechanism. There is an alternative view that the invoice needs to be issued based on time of supply provisions which may not hold good.

ITC in case of RCM payments

Invoice issued under Section 31(3) (f) is also one of specified document in Rule 36 for claiming ITC. It is interesting to note that the self-invoice is needed only when supplier is unregistered. When the supplier is registered but tax is payable by recipient under reverse charge, it is not clear if the ITC is eligible for the recipient based on invoice issued by the supplier which may not have many details prescribed in the tax invoice.
Rule 36(2) provides that ITC is eligible only if the credit document contains the details of the amount of tax charged, description of goods or services, total value of supply of goods or services or both, GSTIN of the supplier and recipient and place of supply in case of inter-State supply.

There could be many instances where the tax payers would have realised or identified the transactions where the GST needs to be paid under reverse charge mechanism after 25th October 2018. The question in such cases is eligibility of credits.

Eligibility / Ineligibility of ITC

Self-invoice being one of the prescribed documents, the tax payer could raise invoices in case of transactions where GST is being paid after the lapse of due date for taking the ITC. Such self-invoice could be the basis for ITC which would be with current date.

Section 16(4) is being reproduced below for reference: *A registered person <u>shall not be entitled to take ITC</u> in respect of any invoice or debit note for supply of goods or services or both after the due date of furnishing of the return under section 39 for the month of September following the end of <u>financial year to which such invoice or invoice relating to such debit note pertains</u> or furnishing of the relevant annual return, whichever is earlier*

The favourable arguments in this regard could be as follows:
The provision restricts the credit in respect of invoice or debit note for supply of goods or services. RCM is levied on receipt of goods or services and therefore, Section 16(4) is not applicable.
Restriction is only in respect of invoices which are dated in previous financial year and linked to financial year and not to supply made in financial year.

There could also be a contrary argument that the ITC would become ineligible even if self-invoice is issued with current date as it would be still in respect of supply of goods or services of previous financial year.

Conclusion

GST being a new law in India, assessees may be undergoing a lot of difficulties in compliance. Professionals could help them in proper compliance which otherwise could invite trouble from the department. Even if there is an unintentional mistake on the part of assessee, the demand notice could be issued under GST by the department for three years after end of the due date for filing the annual return for a particular financial year. Mistakes like claim of credit after the due date prescribed could have interest and penalty implication. Those assessees who have missed to pay and claim ITC under revere charge for expenses pertaining for FY 2017-18 could consider the pros and cons considering the arguments / views expressed in this article to decide on taking/ not taking the ITC.

-CA Madhukar N Hiregange
& CA Mahadev R

Unregistered 'fixed establishment'- Impact in GST

GST needs one to register in the State/s where one provides taxable supplies. (section 22)This is in line with the principle of registration in the place of consumption/ destination. However the place from where the origin takes place needs to be registered.
In the direct taxes the presence of a permanent establishment or a fixed establishment (FE) connotes that there is a profit attributable which needs to be taxed in that jurisdiction. In earlier service tax law and now in GST we see this aspect having some impact. This article examines the impact of such an establishment in GST.
The definition of FE has been directly borrowed from the EU VAT regulation. Section 2 (50) of the CGST Act defines it as: A place other than registered place -Which is characterized by - Sufficient degree of permanence (in terms of time) and - Suitable structure in terms of human (employees/ outsourced) and Technical resources (communication and computing equipment) to -Supply services, or To receive and use services for its own needs.

Analysis of this definition can lead to the following ingredients to be a FE:
a. Temporary site or location may not be a FE,
b. There should be a suitable structure of personnel and technology,
c. Supply or receipt of services should be in such FE

The transaction in goods has a clear trail of the movement evidenced by transporters/ couriers. The intermittent stage of storage of goods and invoicing thereafter may need registration. Warehouses/sales offices/ branches of the entity would be said to be place of business. Goods imported into India could be through the ports, airports or land which is easily regulated.

Services however are much more challenging in the past and now a days even more difficulty due to the digital age with the "cloud" providing a repository of services. The businesses have also become quite complex with global businesses having connections through related parties, affiliates who could be located anywhere in the world.

The Business to Business (B2B) have been controlled through a reverse charge mechanism where import of services is taxable at the same rate as local services with the difference of the recipient being made liable. The place of supply (IGST Act) in these cases plays a key role to decide import or export. India being a federal country we have taxes which accrue directly to the States, amount which accrue to the center and later partially devolve to the States. Therefore States would be keen to see that the GST from services consumed in the State are collected by them.

We understand the issues in services through a few examples:

1. A contractor who gets orders from the Government Departments/ PSUs in different States for digging of tunnels is based at Karnataka from where he controls the works, supplies or gets supplied goods and services needed in the project sites. All the goods/ services get billed to him either IGST (if out of the State) or SGST + CGST if within Karnataka. He avails all the eligible credits and invoices under IGST to his customers out of the State and SGST + CGST for those in Karnataka. His projects take from 1-3 years.
Theoretically he could work from his registration in Karnataka and there would be no loss of revenue for the States where he does his project as IGST is charged. However the following questions could be raised: whether 1-3 years constitutes sufficient degree of permanence?; whether

there existed human and technological structure? ; whether the site office receives services for its own use? If any of the answers is positive then it would be preferable to be registered in each of the States.

Further if input services are related to immovable property then the ITC would not be available in the States since one is not registered. The alternative of having a Input Service Distributorship could be examined if only a few such services exist.

2. An engineering firm from Hyderabad gets orders to install solar plants on factory roof tops in different States. The work takes about 2-5 days depending on the extent. All supplies are made from Hyderabad as in 1st example. In this case maybe the need to register in each of the States may not be there.

3. A manpower service provider based out of Chennai provides software/ telecom engineers to KPO units in Maharashtra and Gujrat. He needs to get all the legal compliances like PF/ ESI etc done in the particular States. All compliances done on the net from Chennai. At time she engages consultants in Gujrat/ Maharashtra. In this case it can be said that there is no FE in Gujrat or Maharashtra.

4. A high net worth individual from Delhi owns a big mall in Kochi. A small office in the basement of the mall supports for maintenance and recovery. All the major activities are carried out from Delhi. He needs to have a registration in Kerala.

5. Another HNW individual from West Bengal has commercial properties in 5 States. The rental terms include the maintenance by the tenant. He bills from WB. No need to be registered in all States.

6. LeeAm- is a US based online line web site which sells online games, music and e-books hosted on “ cloud” to anybody in the world.

Indians frequent this site and place orders and pay online by various means. Under GST even if not for business the individual is liable. However , the provider of OIDAR (Online information and data base access and retrieval services needs to be registered (through a representative) and needs to pay the GST on behalf of the individuals.

In case of B2B services the need to ensure that there is no dispute raised by the States on tax accruing to them is important. Since taxes are paid there can be no allegation of mala fide. However needing to pay the correct tax and seeking refund of taxes already paid can be a cumbersome exercise. Recently the Kerala High Court has come up with a ruling that refund need not be applied for. If this ruling is replicated then we may have the law being amended to allow this adjustment at the back end. However at times this may end up with a dispute on the eligibility of the ITC in which case there could be a cause of concern.

There are no decisions in GST as on date and the EU VAT decisions may provide some guidance.

It is also possible that even though there is no revenue loss on the whole the State officers may sou moto require all those who operate and provide services in their State to be registered which would involve administrative and administrative costs. Therefore for those who are in doubt erring by taking a registration of seeking clarity from the Commissioner/ Advance Ruling Authority could be options though the possibility of revenue bias may exists in both decisions.

In times to come it is possible that the definition of FE may include even a virtual technological presence but till then one can understand as above.

- CA Madhukar N Hiregange

Credit eligibility – cases where no payment liability exists

Under GST, any registered person would be eligible to claim ITC of taxes paid on goods or services procured, which are used or intended to be used in the course or furtherance of business and to the extent used for effecting taxable supplies, unless specifically restricted u/s 17(5) of the Act.

Apart from the restrictions specified in section 17(5) of the Act, there could be situations where credit would become ineligible, like non-payment within 180 days in certain cases, non-receipt of proper tax invoice, etc. However, it can be said that the provisions are not as stringent as under the earlier laws where receipt of the capital goods in the premises/factory of the manufacturer was required. Further, under GST there could be some situations where, say, in spite of non-receipt of the goods in the premises of the recipient or non-payment of consideration to the supplier, credit would still be eligible.

It is also to be understood that **loss of ITC is equal to loss of revenue** for any business. Hence, it is very important to interpret law appropriately and avail ITC wherever eligible. Let us look into the eligibility of ITC in a few peculiar cases:

Case-1: A company (located outside India, say USA) has sent some material samples for testing/analysis to another company in India through a third party courier (hereinafter referred as TP). The TP has filed Bill of Entry (BOE) in name of such Indian company. However, the basic customs duty and IGST has been paid by the TP and reimbursed by the US company. In this case, whether the Indian company is eligible to claim ITC of IGST paid by the TP, even though it has not paid any amount towards the same?

Answer: Firstly, the term "input tax" as defined in section 2(62) of the Act includes IGST charged on import of goods. However, it is not mentioned as IGST PAID on imports. Thus, IGST charged on import of goods, in the instant case, even though not paid for by the Indian company, falls under the purview of input tax credit. Further, the goods are used by the Indian company for business purpose and for effecting taxable supplies as required by section 16(1) and 17(2) of the Act. Hence, prima facie ITC is eligible.

Further, section 16(2) of the Act prescribes conditions for availing ITC, which are as follows:

Condition	Applicability in the instant case
The registered person is in possession of a tax invoice or debit note issued by a supplier registered under this Act, or such other taxpaying documents as may be prescribed	As per rule 36 of CGST Rules 2017, BoE is a prescribed document.
The registered person has received the goods or services or both	The Indian company has received the goods.
The tax charged in respect of such supply has been actually paid to the Government, either in cash or through utilization of input tax credit admissible in respect of the said supply.	It is only provided that tax has to be paid to the Government, i.e. it can be paid by any person, in the instant case by TP and reimbursed by the US company
Registered person has furnished the return under section 39 of the Act.	Indian company has to furnish return.

Further, 2ndproviso to section 16 of the Act states that “where a recipient fails to pay to the supplier of goods or services or both, other than the supplies on which tax is payable on reverse charge basis, the amount towards the value of supply along with tax payable thereon within a period of one hundred and eighty days from the date of issue of invoice by the supplier, an amount equal to the input tax credit availed by the recipient shall be added to his output tax liability, along with interest thereon, in such manner as may be prescribed”:-

It can be said that the above proviso is applicable only in cases when the recipient is liable to pay tax also to the supplier. However, in case of BOEs, the recipient is not required to pay the taxes to the supplier, but the same has to be paid to the Government directly. Thus, it can be said that this proviso is not applicable.

Therefore, as all the conditions prescribed for availing ITC are satisfied and credit is not restricted under section 17(5) of the Act, it can be said that the credit of the taxes mentioned in the BoE will be eligible to the Indian company irrespective of the fact that no amount has been paid by such company to either the Government or to the supplier, in respect of the BoE.

Case-2: A company has purchased machinery for which the supplier has given 3 years warranty. After 1 year, the machinery was damaged. Since, the machine was in the warranty period, the supplier replaced the machinery free of cost. However, while sending the spare parts for replacement, the supplier has discharged GST liability at its end by treating such replacement as supply in terms of entry 1 of Schedule I to the Act (permanent transfer of business assets on which ITC has been claimed), and made available the invoice to the company.

In some cases GST is collected from the company and in some cases no amount is collected from the company. In this case, whether the company is eligible to claim ITC of GST paid by supplier?

Answer: In this case, since the recipient company has used the said good for business and in making taxable supplies, it would be eligible to claim the credit. Also, the recipient company would have satisfied all the conditions specified in section 16(2) of the Act i.e.

i) Company is in possession of tax paying document i.e. invoice

ii) Company has received the goods

iii) The tax charged in respect of such supply has been paid to the Government by the supplier

iv) The company has furnished the GST returns.

Thus, as all conditions are satisfied and since ITC is not restricted under section 17(5) of the Act, the recipient company would be eligible to claim said ITC. Further, 2nd proviso to section 16(2) of the Act (as discussed in above case, relating to payment to the supplier) would not be applicable to the instant case in terms of proviso to rule 37(2) of the Rules, being a Schedule I supply. Hence the recipient company would be eligible for the credit.

Thereby, it can be seen that under GST, payment for the value of the goods and the related taxes, is not a pre-requisite in all cases for being eligible for the credit. Thereby, it is important for all assesses to, not only analyse the expenses booked to identify missed credit but also to look at other goods or services received for business purpose and used for making taxable supplies and analyse the credit eligibility.

-CA. Shilpi Jain.

Common Errors – ITC(Documentation and Recording)

Background

The primary focus of the industry at the time of introduction of GST was on implementation/modification of ERP module to suit GST requirements, appropriate classification of goods/services and providing training to staff. Initially, the area of focus was more on the aspect of migration, correct levy of taxes, reverse charge liability and ensure timely compliances with return uploading requirements.

However after 15 months, the focus had shifted to validation of input tax credit and reconciliation of credits with Form GSTR-2A data. This is partly on account of Department enquiries w.r.t. Form GSTR-2A vs Form GSTR-3B input tax credit mismatch and the reporting requirement under Table 8 of Form GSTR-9.Trade/ Industry who were already under internal audit of indirect tax, credit reconciliations and management audit were regularly ensuring eligible credits were taken on timely basis with adequate evidence to pass scrutiny, in case of any verification in pre GST regime. However proportion was less than 10% though this was a value added activity rather than a cost.

In general, the errors in ITC can be classified:

- lack of understanding of what is eligible and not eligible,
- mistakes in reversal of proportionate credit,
- delay in credit availment,
- documentation/ recording issues and others.

These mistakes would be more in case of entities having multiple registrations under GST. The challenge would also be to ensure that the credit has been availed in the appropriate State. In this article we examine ONLY some common errors and possible solution relating to documentation and recording observed in review assignments and pre audit verifications.

SL.No	Error	Impact & Action
1	Invoice issued by **Vendor in State A** charging CGST & SGST without **GSTIN of Co. State A** - Credit availed by **Co. State A** Invoice not available in Form GSTR-2A.	Possible loss of Input Tax Credit. Obtain revised invoice from Vendor and ensure that the said invoice is reported by the vendor as B2B transaction in Form GSTR-1
2	Invoice issued by **Vendor in State A** charging CGST & SGST with incomplete/incorrect **GSTIN of Co. State A** - Credit availed by **Co. State A.** Invoice not available in Form GSTR-2A.	Possible loss of Input Tax Credit. Obtain revised invoice from Vendor and ensure that the said invoice is reported by the vendor as B2B transaction in Form GSTR-1

SL.No	Error	Impact & Action
3	Invoice issued by **Vendor in State A** charging CGST & SGST with GSTIN of **Co. State A** and address of **Co. State B**- Credit availed by **Co. State A.**	Possible loss of Input Tax Credit. Obtain revised invoice from Vendor with correct address
4	Invoice issued by **Vendor in State A** charging CGST & SGST with GSTIN of **Co. State A** – Invoice reported by Vendor in Form GSTR-1 with GSTIN of **Co. State B** Invoice reported in Form GSTR-2A of other State.	Possible loss of Input Tax Credit. Communicate to the vendor about the said error and follow-up for rectification with the vendor in Form GSTR-1.
5	Invoice issued by **Vendor in State A** charging CGST & SGST with **ISD GSTIN** of **Co. State A** - Credit availed by Regular GSTIN **Co. State A.**	Reverse credit availed by **Regular GSTIN of Co. State A** Distribute the said credit through the **ISD return**
6	Invoice issued by **Vendor in State A** charging CGST & SGST with **Regular GSTIN of Co. State A** - Credit availed by Regular GSTIN **Co. State A**. Vendor reported the said invoice in Form GSTR-1 against the **ISD GSTIN of Co**.	Communicate to the vendor about the said error and follow-up for rectification with the vendor in Form GSTR-1.
7	Invoice issued by **Vendor in State A** charging CGST & SGST with **GSTIN of Co. State A** - IGST Credit availed by **Co. State B**	Reverse IGST credit availed in **Co. State B.** Avail CGST & SGST credit in the **Co. State A**
8	Invoice issued by **Vendor in State A** charging IGST with **GSTIN of Co. State B** - CGST & SGST credit availed by **Co. State B**	Reverse CGST & SGST credit availed in **Co. State B**. Avail IGST credit in the **Co. State B**

SL.No	Error	Impact & Action
9	Invoice issued by **Vendor in State A** charging CGST & SGST with **GSTIN of Co. State A** - CGST & SGST credit availed by **Co. State B**	Reverse CGST & SGST credit availed in **Co. State B**. Avail CGST & SGST credit in the **Co. State A**
10	Invoice issued by **Vendor in State A** charging CGST & SGST with **GSTIN of Co. State B** - CGST & SGST Credit availed by **Co. State A.**	Reverse CGST & SGST credit availed in **Co. State A** CGST & SGST has been charged in Invoice by **Vendor State A** against the GSTIN of **Co. State B**. CGST & SGST Credit cannot be availed by **Co. State B**. If revised invoice can be obtained from the vendor with GSTIN of **Co. State A**, credit can be availed in **Co. State A**
11	Invoice issued by **Vendor in State A** charging IGST with **GSTIN of Co. State B** - CGST & SGST Credit availed by **Co. State A**	Reverse CGST & SGST credit availed in **Co. State A** Avail IGST credit in **Co. State B**
12	Invoice issued by **Vendor in State A** charging IGST with **GSTIN of Co. State B** - IGST Credit availed by **Co. State C**	Reverse IGST credit availed in **Co. State C**. Avail IGST credit in **Co. State B**
13	Invoice issued by vendor prior to 1 July 2017 with Service Tax - Availed as IGST credit.	Reverse IGST credit availed
14	Excess reporting and payment of output tax liability in Form GSTR-3B, availed as input tax credit.	Excess payment of output tax liability in GST return shall be adjusted against the liability of the subsequent months. Input tax credit availed on account of such excess payment shall be reversed.
15	IGST credit availed as CGST & SGST and vice-versa, in Form GSTR-3B. (Error in return disclosures)	Reverse input tax credit availed under the wrong head and avail the same under the correct head.

The above list of common errors could extend further and differ based on the confusion in the GST provisions and incorrect rectification of errors committed.
There are certain errors which can be rectified, if identified well in advance and provides an opportunity to the assesse to avoid additional tax cost. The interest cost in case of incorrect availment of credits would also be a factor to be considered.

As per Section 16(4) of the CGST Act,2017 the time limit for availment of input tax credit is the due date for furnishing the return for the month of September (under section 39 of the CGST Act) or furnishing of annual return, whichever is earlier. The question raised here is whether Form GSTR-3B can be considered as a return under Section 39 of the CGST Act,2017 read with Rule 61 of the CGST Rules,2017, as a replacement to Form GSTR-3. This aspect has already been challenged before various High Courts [2018-TIOL-179-HC-AHM-GST and 2018-TIOL-177-HC-DEL-GST] and the finality of these cases would provide the judicial standing on the said issue.

Rectifiable errors detected beyond the time limit for rectification, would also result in tax cost. Since loss of input tax credit would directly result in additional cost, it is imperative to have a strong internal control system for appropriate validation of credits and reconciliation of credits with Form GSTR-2A. In case of multiple registrations, it would also be advisable to conduct periodic review audits to identify, prevent and correct the errors.

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Reversal of common ITC availed on inputs and input services

This article has been published in Tax Management India at https://www.taxmanagementindia.com/visitor/detail_article.asp?ArticleID=8288&kw=Reversal-of-common-ITC-availed-on-inputs-and-input-services

Credit Mechanism is the backbone of the indirect tax regime which allows the assessee to take credit of tax paid on purchase of goods and services availed, in the course of business, though with some conditions and restrictions. Credit under GST is available if used for business purpose and in proportion of its usage for making taxable supplies. Reversal of input tax credit (ITC) is required in respect of procurements that are commonly used for taxable and exempted & non-business supplies or if used for making only exempt supplies or used for non-business purposes.

In this article we would like to explain the credit reversal mechanism for input and input services under various business scenarios, to see how the provision is beneficial is some cases and in some cases not so.

Credit Reversal under Goods & Services Tax

Section 17(2) of the CGST Act, 2017 (hereinafter referred to as the 'Act') restricts ITC in case where supplies are used for effecting taxable and exempt supplies whereby ITC shall be available only to the extent attributable to taxable supplies including zero rated supplies. The said provision read with rule 42 of the CGST Rules, 2017 (hereinafter referred to as the 'Rules') specify the manner of determining the amount of reversal of ITC.

As per such rule the reversal of ITC in respect of goods/services used **commonly** for both taxable and exempt supplies (hereinafter referred to as common ITC) shall be calculated per the formula below:

$$D1 = E/F*C2$$

D1=amount of input tax credit attributable towards exempted supplies
E = the aggregate value of exempted supplies
F= the total turnover in the State
C2=common credit pertaining to taxable as well as exempted supplies

The above shall be calculated for every **tax period** and finally re-calculated again for the **financial year.** Any short or excess credit resulting thereby can be availed/reversed by September of the following year, in terms of rule 42(2) of the Rules. This can be understood with an illustration:

Say ABC Ltd manufactures two varieties of footwear, one is exempt hawai slippers and the other is taxable shoes. Its turnover w.r.t exempt supplies is Rs. 1,00,000/- and taxable supplies is Rs. 2,00,000/- in a particular tax period and credit that is used commonly for both these supplies is Rs. 15,000/-. Then,

ITC to be reversed = Rs. 5,000/- (i.e. 15,000 * 1,00,000 / (1,00,000+2,00,000))

Now let's discuss a few more scenarios to understand the same in detail:

Scenario 1: M/s. ABC Ltd has turnover of Rs. 45 lakhs from Jul '17 to Mar '18 as below:
Jul'17 to Feb'18 - only taxable turnover of Rs. 5 lakhs per month
Mar '18 - taxable turnover of Rs. 3 lakhs and exempted turnover of Rs. 2 lakhs
Further, total ITC during Jul '17 to Mar '18 is Rs. 4,20,000/- out of which common ITC is Rs. 20,000/- during Mar '18.

Thereby, amount of ITC to be reversed for Mar '18 would be **Rs. 8,000** (i.e. 20,000 * 2 lakhs / 5 lakhs)
However, as per sub rule 2 of rule 42, ITC as determined above needs to be finally calculated **for the entire year** as below:

20,000 * 2 lakhs / 45 lakhs = **Rs. 889** only. Hence it can be seen that on re-computing the ITC reversal for the financial year, the amount of reversal has reduced substantially.

Scenario 2: M/s. XYZ Ltd. being a company engaged in poultry farming and has 2 units as below, having same GST registration:
Unit A (Rs. 100 crores turnover for FY) – 90% taxable turnover, 10% exempt turnover
Unit B (Rs. 1000 crore turnover for FY) – 20% taxable turnover, 80% exempt turnover
Thereby, total exempt turnover = **Rs. 810 crores**

Further, Unit B has a major chunk of its credits used for exempt supplies and a fraction of common credit, whereas Unit A has a major chunk of its credit being common credit. The following are the details of common ITC at both these units during the FY:
Unit A – Rs. 12 lakhs
Unit B – Rs. 20 lakhs
Total common ITC = **Rs. 32 lakhs**

In this case the ITC reversal for M/s. XYZ would be **Rs. 23.56 lakhs** [i.e. 32 * 810/1100]
However, if these 2 units were separately registered under GST then the credit reversal would be as under:
Unit A = Rs. 1.2 lakhs [i.e. 12 * 10%}
Unit B = Rs. 16 lakhs [i.e. 20 * 80%]
Total ITC reversal = **Rs. 17.20 lakhs**

Thereby, it can be seen that by taking separate registration, the quantum of reversal of common credits for Unit A would reduce substantially.

Scenario 3: M/s. DEF Ltd is registered and engaged in providing construction services of residential complex. M/s. DEF Ltd. has sales even after obtaining OC, and if entire consideration for sale of a unit is received after OC, the same would be exempt. The following are details of the project.

Year	Taxable Turnover	Exempted Turnover	Common ITC
1	No	No	No
2	Yes	No	No
3 (OC received)	Yes	Yes	Yes
4	No	Yes	No

From the above it can be seen that in Year 1 there were no sales and since M/s. DEF **intended** to sell all the units before OC, there is no common credit and the entire credit is eligible. In Year 2 bookings were made and amounts were received from customers. There being no exempt turnover, no common ITC whereby entire ITC would be eligible.

In Year 3, during the second half of the year OC was received and there were certain bookings done after receipt of OC. Further, the construction of all the 'before OC' units has been completed. In this regard, it is to note that until the receipt of OC, whatever credit has been accumulated is **not a common credit** but a credit **intended** to be used for taxable supplies. Thereby fully eligible credit and no reversal is required. However, once OC is received, any ITC accumulated would be in the nature of common credit and this credit alone will have to be proportioned as per rule 42.

Say credit of:
Year1 - Rs. 26 Lakhs
Year2 - Rs. 18 Lakhs
Year3 - Rs. 6 lakhs (for before OC procurements) and Rs. 2 lakhs (for after OC procurements)
Year 4 – Rs. 1 Lakh

The credit of Year 1, 2 & before OC credit of Year 3 i.e. Rs. 50 Lakhs would be fully eligible. Credit reversal in this case in terms of rule 42 of the Rules will be only for the credit of Rs. 2 lakhs of the Year 3. The Year 4 credit of Rs. 1 Lakh would be fully ineligible.

In Year 4, any credit accumulated would be relating to exempt supplies and thereby entire credit would not be eligible.

Thus, from the above it can be seen that credit reversals would have to be done on a financial year basis and that too only relating to the common credits. Further, such reversal would be required only when there is any exempted turnover in such financial year. Revisiting the credits availed earlier is not required as there is no express provision in this regard in the law.

Conclusion:

Thus, we can observe that even if there is unequal reversal of ITC during different months due to varied pattern of turnover, the same would be streamlined at the end of the financial year when the credit reversal will have to be calculated by adopting the turnover of the entire year. This could be beneficial in some cases and not so in others. Further, in case of construction service, where financial year-wise reversal of credit is only envisaged, the department may dispute and require the assessee to reverse credits by considering the revenue from the entire project. To mitigate the risk of any possible demand and penalty, the assesses could consider intimating the calculations under rule 42 and 43, on annual basis, to the department.

-CA. Shilpi Jain
- Bharath Chandra.

Customs Updates

Clarification with respect to amendments to Customs and Central Excise notifications for EOUs – reg.

All the amendments relating to EOU has been incorporated in the circular. For better understanding of the new legal stipulations that may apply to the EOUs, refer ***Circular No. 50/2018-Customs*** dated 6th December 2018.

Revision of All Industry Rates (AIRs) of Duty Drawback.

The Central Government has notified the revised All Industry Rates (AIRs) of Duty Drawback vide Notification No. 95/2018-Customs (N.T.) dated 6.12.2018 which will come into force on 19.12.2018. The notification may be downloaded from Board's website and carefully perused for details. The salient features of the revised AIRs are as follows –

As being done since 1.10.2017, the revised AIRs of Duty Drawback neutralize incidence of duties of Customs on inputs used and remnant Central Excise duty on specified petroleum products used in manufacture of export goods. Accordingly each tariff item in the Schedule annexed with above mentioned Notification has been provided with one AIR specified under column (4) with caps under column (5) in the Schedule. For claiming these AIRs, the relevant tariff item have to be suffixed with suffix 'B' e.g. for export of goods covered under tariff item (TI) 640609, the drawback serial no. should be declared as 640609B

The notification also specifies the alternative AIRs on garments exports made against the Special Advance Authorization (para 4.04A of Foreign Trade Policy 2015-20) in discharge of export obligations in terms of Notification No. 45/2016- Customs dated 13.08.2016. For claiming these alternative AIRs, the relevant tariff item has to be suffixed with suffix 'D' instead of the usual suffix 'B

For more details, refer ***circular No. 52/2018 – Customs*** dated 12th December 2018.

Procedure for disposal of un-claimed/un-cleared cargo under section 48 of the Customs Act, 1962, lying with the custodians –reg.

Procedure prescribed for disposal of un-claimed/un-cleared cargo if goods not cleared within one month from date of import. For more details, refer ***circular No. 49/2018 customs*** dated 3rd December 2018.

FTP Corner

Requirement of documents for online IEC application – Clarification regarding

A new set of documents required for issuing of IEC has prescribed. Further clarified in whose name IEC is going to be issued. For more details refer ***Trade Notice number 39/2018-19*** dated 12th December 2018

Availability of Speed post dispatch particulars in MEIS module

For trade facilitation and furthering lease of doing business', a system driven automated approval of MEIS claims is in operation from 13.09.2018, the details of which are available in Trade Notice 30 dated 11.09.2018. A new feature is being added, with immediate effect, so that exporters can track the MEIS speed post dispatch made by the Regional Authorities. For more details, refer ***Trade Notice No 38/2018*** dated 03rd December 2018.

Amendment for Exhibits required for national and international exhibitions or fairs and demonstration.

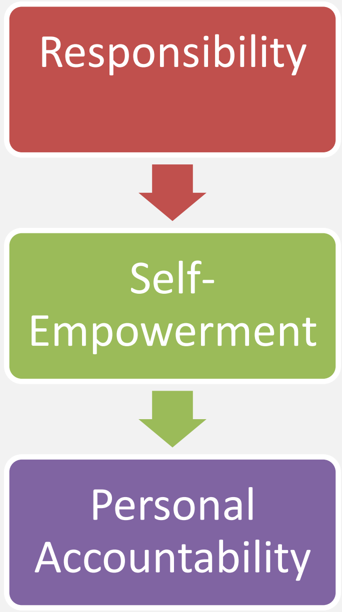
Para 2.63 of hand book of procedure revised import/export of exhibits, including the construction and decorative materials, except items in the probhited for SCHOMET list, required for the temporary stands of foreign/Indian exhibitors at exhibitions, fair or similar show or display for a period of six months on re-export/re-import basis, shall be allowed without an authorization on submission of bond/security to customs or ATA carnet.

To read exiting provisions, refer ***Public Notice Number 58/ (2015-2020)*** dated 12th December 2018.

-Venkatanarayana G M

Accountability

According to Cambridge Dictionary, Accountability means the fact of being responsible for what you do and able to give a satisfactory reason for it, or the degree to which this happens. Accountability is required in every aspect of life.
Accountability is not just a mind-set—it's also a skill-set that everyone can learn. It may not be as easy as one-two-three, but it is a **three-step process**:



1.Responsibility

Responsibility is not something you do—it's a way of thinking and being. When you're truly responsible, you believe that success or failure is up to you, even if you work within a team or are blind-sided by unforeseen circumstances. You own your commitment to a result before the fact, before you even take action.

—*Be responsible "either way."* ***It's easy to claim responsibility when things go well, but it's hard when they don't.*** A truly responsible person, however, accepts responsibility either way. So next time you take on a project, be 100% responsible for the outcome. Not a little. Not somewhat. Not pretty much. Own it 100%—good or bad.

—*Recognize your power.* You already have the ability to be 100% responsible; everybody does. Yet most of us don't realize at least don't admit , that we alone have the power to manage our lives and careers. But that is a conscious choice; it doesn't happen without your permission.
—*Deal with what is.* Think about it: It doesn't matter what should have happened—it matters what is. That saves you the trouble of figuring out who's to blame or worrying about how things "could a would a should a" been if only something had gone differently. It didn't—and that makes your choice a cinch: "How do I want to react to the situation that is?"

2.Self-empowerment

There is only one kind of empowerment, and that is self-empowerment. Unlike granting authority, empowerment comes from within. By empowering yourself, you take the actions—and the risks—to achieve a result and get what you want. Rather than waiting for someone to declare you empowered or give you that one lucky break, you step outside your comfort zone, make things happen, and answer for the outcomes.

—*Manage expectations*. The most direct route to self-empowerment is to be clear about expectations—not only what you expect, but also what's expected of you. To do that, you need to ask questions, make agreements, and clarify everything in writing.

—*Take back your time*. "No" is an empowering word. So every time you utter, "I can't say no," ask yourself if you can't—or if you're unwilling to. Take back your time in other ways, too: get rid of your to-do list (track projects and deadlines on a calendar instead); resist over-scheduling (you can't cram 12 hours of work into eight hours, so stop trying); and estimate times realistically (let's face it, most tasks take longer than we think they will).

3.Personal accountability

It's a willingness to answer for the outcomes of your choices, actions, and behaviours. When you're personally accountable, you stop assigning blame, and making excuses. Instead, you take the fall when your choices cause problems.

—Tell the truth. Everybody messes up sometimes. Lying about it or trying to cover it up always makes it worse—no exceptions. Save yourself some time: Don't tell untruths. Nobody believes them anyway—not even you.

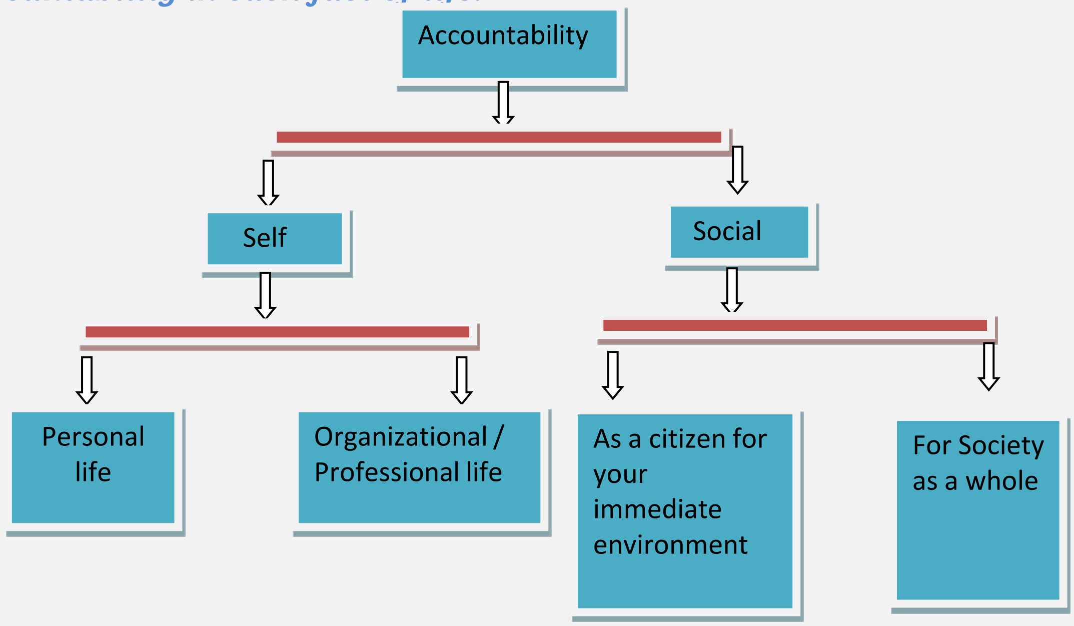
—Police yourself. Are you accountable for your actions even if nobody holds you accountable—or nobody catches you? You bet you are. So be your own "accountability cop" and police yourself. On the long and winding road of life, choose accountability at every turn.

—Look to yourself—first. When trouble arises, look first to yourself. Ask four specific questions: "What is the problem?" "What am I doing—or not doing—to contribute to the problem?" "What will I do differently to help solve the problem?" and "How will I be accountable for the result?"

Personal accountability is sorely lacking—and urgently needed—in business and across society as a whole. Wait no longer—do it now. Choose accountability and own your success at work and in life.

Accountability and responsibility are not the same. You are responsible to things, but accountable to people. Accountability is not something that's to mandate. Because accountable is keeping your commitments to people.
Accountability

Accountability in each fact of life:



Accountability in personal life:

The standard antidote for relationship problems seems to be good communication. We put emphasis on talking things out. But often, no matter how much we talk, our problems don't get resolved. Before we throw in the towel, let's consider this: talking is not enough unless we hold ourselves accountable.
To hold oneself accountable means to own one's feelings, and taking responsibility for one's contribution to the relationship-good and bad. If both people are accountable, one would work at changing their behaviour and the other would work at managing their feelings better.
Lack of accountability is when you apologise, but don't change your behaviour. Saying one thing, and doing another, is the biggest deal-breaker. It compromises trust and reliability and makes the other partner insecure. One of the most challenging things in a relationship is to find the balance between "me" and "we". But if "me" wins over "we", more often, it might be time to re-evaluate things.

Accountability in professional life:

Accountability is a choice, a mind set and an expression of integrity. Some individuals exhibit it more than others, but it can and should be learned as it is not only the foundation for a successful life, but also a prerequisite for happiness. Once people stop focusing on what's happening "to" them and focus on what they can do within their current circumstances to succeed, they will get the results they are looking for. These results will lead to a happier, more engaged attitude – particularly at work – as it will reaffirm that they are the architects of their own lives and can handle whatever comes their way. Once they realize how competent they are, a greater confidence in their abilities will follow.

Having full ownership over our actions and results involves the ability to embrace the good, the bad and the ugly. Commitment is one of the factor that contribute directly to personal accountability. Being committed means they are willing to do what it takes to get results, no matter what the challenge or task at hand. It means buying in readily to what is asked of them, even if it isn't in their immediate job description. Those who are accountable are willing to fulfil a larger role for the good of the organization.

Accountability in Leadership:

One of the core principles of leadership is accountability. A good leader never blames anybody else for the outcome for the results. He takes ownership to ensure responsibilities are achieved as expected. Accountable leaders do not blame others when things go topsy-turvy. Rather, they make things right – they are fixers.

For those of you who are history freaks, you know that President Harry S. Truman had a sign on his desk that read: "The Buck Stops Here." It meant he accepted accountability for all the decisions of his administration. Truman's stand exists in organizations today but, unfortunately, as the exception rather than the rule.

Accountability builds trust within teams, creates respect between leaders and employees, and promotes a sense of fairness that is essential to an engaged workforce. Accountability is exactly why leadership is so tough and exactly why there are so few real leaders.

Accountability as a citizen :

- Accountability in digital life
- Environmental Accountability
- Political Accountability

Accountability in digital life:

People have to be accountable in every path of life. In this modern digital life, where people love to share each and every moment of their life with their friends, relatives and beloved ones, they post everything in social media. People need not be responsible, but they are accountable for their posts, tweets and blogs.

This is when the parents and world think about accountability. Children are accountable for their actions. But it is the responsibility of parents, elders to ensure that their kids are in a safer side. Accountability is answerability to one's own self.

Environmental Accountability :

Public participation in environmental decision-making has become an indelible feature of many environmental regulatory systems worldwide over the past few decades. Individuals and organisations affected by development approvals, pollution licences, land use plans

and other types of regulatory processes have increasingly demanded greater consultation, and more transparent and accountable decisions .
Public participation is particularly significant in the context of sustainable development. Sustainability depends largely on the way economic, social and environmental considerations have been integrated in decision-making.

So, it is the social responsibility for all of us. The Companies Act, 2013 upon considering the importance of social responsibility has included a provision under section 135, where few prescribed companies are required to constitute Corporate Social Responsibility Committee in the Board of Directors.

Political Accountability:

Voters 'delegate' their sovereignty to popular representatives, who in turn delegate most of their authority to a cabinet of ministers. The ministers subsequently delegate authority to their civil servants or to various independent, administrative bodies.
So, as the popular sentence goes, "The youths of today are tomorrow's leaders", the youth are highly responsible for electing their representatives. So, they must be very much present and politically update their knowledge .They should understand their importance and be accountable.

Strategies to Becoming More Accountable:

Accountable leaders are built by the adoption of at least 4 separate strategies:
Accountability starts with **honesty**. Often this requires setting aside personal pride, admitting your own mistakes, and being completely honest with yourself. Honest leaders become accountable by reviewing their own role in a situation and devising a reasonable solution to resolve issues, conflict, and challenges in an authentic and genuine fashion.

Accountable leaders **voluntarily say, "I'm sorry"** when something has gone awry and they are responsible for the wrongdoing. The backdrop to a real apology is a focus on making amends, committing to what needs to be done to fix the situation, and executing on it when promised. By apologizing and creating a plan to fix the situation, accountable leaders allow a focus on the end goal rather than on the problem.

Accountable leaders **seek input from others** – bosses, peers, direct reports, friends and partners – about how something that didn't go so well could have gone better. Accountable leaders look for ways to do things differently in the future. They seek opportunities to initiate change when the change instigates improved ways of handling situations, making decisions, and developing talent.

Accountable leaders **do not avoid responsibility,** they do not procrastinate, and they do not under or over commit. They know when to say no and they know when to ask for more. Before agreeing to new tasks, new deliverables, new to-do's, they review their schedules and know whether they have the physical time required to complete the work on time and with quality. If unsure about whether they can commit, they say no to the task and yes to the person asking for the commitment. In this way, accountable leaders provide their own insurance that they won't let promised work go undone.

ACCOUNTABILITY from Brian Tracy

Consider what would happen if I were to follow you with a camera crew 24 hours a day, 7 days a week, for the next 100 days while you went for your goals?
I bet 3 things would happen…
1) You would START doing the things you say you need to do.
2) You would STOP doing the things you know you shouldn't be doing.
3) You would MAKE monumental performance gains and change your life.
This is ALL possible through the discipline of accountability. Accountability serves and protects your character, credibility and commitments. It ensures that what you want to accomplish gets accomplished.
Throughout every area of your life, it's important to understand that ALL unfinished goals, projects and relationships are the result of broken promises, unfulfilled commitments, and lack of accountability.

Conclusion: Without accountability, even the most brilliant, hard-working, well-intentioned leaders fail – they fail to meet their performance goals, they fail to develop their teams, they fail to hire top talent, they fail to coach their employees, they fail to communicate clearly, they fail to optimize performance, and they fail the business overall. Effective leadership requires real accountability.

Robin Sharma, a Canadian writer and one of the world's top leadership experts, has written in his blog that everybody should have a responsibility meter. The needles should be ideally at the middle in their respective responsibility meters. He further says that Life's all about a balance. And one of the most vital of all balance points is the one involving freedom and responsibility. Yes, be free. Enjoy the moment. Have a good time. Live in the now. And, yet, be responsible. Set your goals. Keep your promises. Get important things done.

- Chaithra H R

Notifications & Circulars issued for the period December 2018

Sl No	Subject	Notification / Circular No. & Date of Issue	Link to Download
1	Seeks to extend the time period specified in notification No. 31/2018-CT dated 06.08.2018 for availing the special procedure for completing migration of taxpayers who received provisional IDs but could not complete the migration process	67/2018-Central Tax ,dt. 31-12-2018	Click Here
2	Seeks to extend the time limit for furnishing the return in FORM GSTR-3B for the newly migrated taxpayers.	68/2018-Central Tax ,dt. 31-12-2018	Click Here
3	Seeks to extend the time limit for furnishing the return in FORM GSTR-3B for the newly migrated taxpayers.	69/2018-Central Tax ,dt. 31-12-2018	Click Here
4	Seeks to extend the time limit for furnishing the return in FORM GSTR-3B for the newly migrated taxpayers	70/2018-Central Tax ,dt. 31-12-2018	Click Here
5	Seeks to extend the time limit for furnishing the details of outward supplies in FORM GSTR-1 for the newly migrated taxpayers.	71/2018-Central Tax ,dt. 31-12-2018	Click Here
6	Seeks to extend the time limit for furnishing the details of outward supplies in FORM GSTR-1 for the newly migrated taxpayers	72/2018-Central Tax ,dt. 31-12-2018	Click Here
7	Seeks to exempt supplies made by Government Departments and PSUs to other Government Departments and vice-versa from TDS	73/2018-Central Tax ,dt. 31-12-2018	Click Here
8	Fourteenth amendment to the CGST Rules, 2017	74/2018-Central Tax ,dt. 31-12-2018	Click Here
9	Seeks to fully waive the amount of late fees leviable on account of delayed furnishing of FORM GSTR-1 for the period July, 2017 to September, 2018 in specified cases.	75/2018-Central Tax ,dt. 31-12-2018	Click Here
10	Seeks to specify the late fee payable for delayed filing of FORM GSTR-3B and fully waive the amount of late fees leviable on account of delayed furnishing of FORM GSTR-3B for the period July, 2017 to September, 2018 in specified cases	76/2018-Central Tax ,dt. 31-12-2018	Click Here
11	Seeks to fully waive the amount of late fees leviable on account of delayed furnishing of FORM GSTR-4 for the period July, 2017 to September, 2018	77/2018-Central Tax ,dt. 31-12-2018	Click Here
12	Seeks to extend the due date for furnishing FORM ITC-04 for the period from July, 2017 to December, 2018 till 31.03.2019.	78/2018-Central Tax ,dt. 31-12-2018	Click Here

Notifications & Circulars issued for the period December 2018

SI No	Subject	Notification / Circular No. & Date of Issue	Link to Download
13	Seeks to amend notification No. 2/2017 - Central Taxes dated 19.06.2017.	79/2018-Central Tax ,dt. 31-12-2018	Click Here
14	Seeks to further amend notification No. 1/2017-Central Tax (Rate) dated 28.06.2017 to change GST rates on goods as per recommendations of the GST Council in its 31st meeting	24/2018-Central Tax (Rate) ,dt. 31-12-2018	Click Here
15	Seeks to further amend notification No. 2/2017-Central Tax (Rate) dated 28.06.2017 to exempt GST on goods as per recommendations of the GST Council in its 31st meeting	25/2018-Central Tax (Rate) ,dt. 31-12-2018	Click Here
16	seeks to exempt central tax on supply of gold by nominated agencies to registered persons	26/2018-Central Tax (Rate) ,dt. 31-12-2018	Click Here
17	Seeks to amend notification No. 11/2017- Central Tax (Rate) so as to notify CGST rates of various services as recommended by Goods and Services Tax Council in its 31st meeting held on 22.12.2018.	27/2018-Central Tax (Rate) ,dt. 31-12-2018	Click Here
18	Seeks to amend notification No. 12/2017- Central Tax (Rate) so as to exempt certain services as recommended by Goods and Services Tax Council in its 31st meeting held on 22.12.2018	28/2018-Central Tax (Rate) ,dt. 31-12-2018	Click Here
19	Seeks to amend notification No. 13/2017- Central Tax (Rate) so as to specify services to be taxed under Reverse Charge Mechanism (RCM) as recommended by Goods and Services Tax Council in its 31st meeting held on 22.12.2018	29/2018-Central Tax (Rate) ,dt. 31-12-2018	Click Here
20	Seeks to insert explanation in an item in notification No. 11/2017 – Central Tax (Rate) by exercising powers conferred under section 11(3) of CGST Act, 2017.	30/2018-Central Tax (Rate) ,dt. 31-12-2018	Click Here
21	Seeks to amend the IGST Rules, 2017 so as to notify the rules for determination of place of supply in case of inter-State supply under sections 10(2), 12(3), 12(7), 12(11) and 13(7) of the IGST Act, 2017	04/2018-Integrated Tax, dt. 31-12-2018	Click Here

Notifications & Circulars issued for the period December 2018

Sl No	Subject	Notification / Circular No. & Date of Issue	Link to Download
22	Clarification on certain issues (sale by government departments to unregistered person; leviability of penalty under section 73(11) of the CGST Act; rate of tax in case of debit notes / credit notes issued under section 142(2) of the CGST Act; applicability of notification No. 50/2018-Central Tax; valuation methodology in case of TCS under Income Tax Act and definition of owner of goods) related to GST	Circular No. 76/50/2018-GST	Click Here
23	Denial of composition option by tax authorities and effective date thereof	Circular No. 77/51/2018-GST	Click Here
24.	Clarification on export of services under GST	Circular No. 78/52/2018-GST	Click Here
25.	Clarification on refund related issues	Circular No. 79/53/2018-GST	Click Here
26.	Clarification regarding GST rates & classification (goods)	Circular No. 80/54/2018-GST	Click Here
27.	seeks to clarify GST rate for Sprinkler and Drip irrigation System including laterals	Circular No. 81/55/2018-GST	Click Here

Happenings at Academy

Upcoming Events

Mark your Calendar

Topic	*Date*	*Venue & Brochure link*
GST Certification course	***07/01/19 to 12/01/19***	***Hiregange Academy, No.33 Second Floor 26th Main, 36th Cross Road, 4th T Block, Jayanagar, Bangalore – 560041 (opp. Thaza Thindi)*** ***http://hiregangeacademy.com/event/PDF__GST-Certification-14th-batch-Brochure-14-Jan2019-converted.pdf***
Workshop on "Practical Challenges w.r.t Movement of Goods including E Way bills and Penalties"	***28th January 2019***	***Hiregange Academy, No.33 Second Floor 26th Main, 36th Cross Road, 4th T Block, Jayanagar, Bangalore – 560041 (opp. Thaza Thindi)*** ***http://hiregangeacademy.com/event/PDF_28.01-2019_GST-Workshop-Brochure-converted.pdf***

1. Registration for Practical Training Assessment Test on December 30, 2018
https://resource.cdn.icai.org/53222bos42659.pdf

2. Announcement for applicability of Supplementary Study Paper of Paper 2: Business Law, Ethics and Communication for May, 2019 Examinations - (12-12-2018)
https://resource.cdn.icai.org/53128bos42587.pdf

3. National conference for CA students on 12th and 13th January- Mumbai
https://resource.cdn.icai.org/53247bos42692mumbai.pdf

4. CA students conference at Pondicherry on 9th and 10th January, 2019(27-12-2018)
https://resource.cdn.icai.org/53496bos42924pondicherry.pdf

5. CA STUDENTS CONFERENCE - AMRITSAR Dates: 11th Jan & 12th January, 2019
https://resource.cdn.icai.org/53499bos42933.pdf

6. CA STUDENTS CONFERENCE-2018-Kerala Dates: 24th & 25th January, 2019
https://resource.cdn.icai.org/53497bos42924calicut.pdf

7. Letter sent to Chairman, UGC in context with study of examination answer books re-valuation system in Central Universities
https://resource.cdn.icai.org/52995bosugc42496.pdf

8. Letter sent to Secretary, MHRD in context with study of examination answer books revaluation system in central universities.
https://resource.cdn.icai.org/52996bosmhrd42496.pdf

9. Constitution of Study Group on “Best Practices on Revaluation of Answer Books” - (06-12-2018)
https://resource.cdn.icai.org/53018bos42514.pdf

Concluded Events

Topic	Date	Venue & Brochure link
GST Certification course	08/12/18 to 23/12/18	Hiregange Academy and link as follows: http://hiregangeacademy.com/events-concluded.php

GST Certification Course from 8.12.2018 to 23.12.2018 (weekends only)

We thank all the delegates and the speakers for making the seminar a marvelous learning experience!

We are encouraged by our readers and the complements received. In our endeavour to improve our quality we request you to give two minutes time to give feedback.

-Thanking you,
Newsletter team

Write us at-
https://docs.google.com/a/hiregangeacademy.com/forms/d/1LprDBXql1Ld0rG7cn8p-dMW- lhkQRPcZtN6bwSXrr0/edit?usp=drive web