



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

Vol :08 Issue: 31

SEPTEMBER 2026

NEWSLETTER



Chairman's Message



Excellence is achieved not by chance, but through continuous learning, committed effort, and steadfast dedication



Dear Esteemed Members, Students, and Friends,

It is a privilege to share with you the activities and accomplishments of the ICAI Kottayam Branch during the month of September 2026. The month witnessed a meaningful blend of professional learning, academic pursuits, and fellowship, reflecting the vibrant spirit of our Branch.

On 5th September 2026, the Branch organised a CPE Seminar on “FCRA: New Rules, New Questions-Decoding Recent Amendments and Regulatory Developments”, led by CA Jacob Baboo, Kottayam. The session provided members with valuable insights into the evolving regulatory framework, recent amendments, and practical aspects of FCRA compliance. The programme carried 3 Hours of CPE Credit and served as a valuable platform for professional enrichment and knowledge enhancement.

The occasion was further enriched by the Onam celebrations organised by the Branch. Our SICASA students

presented an impressive range of cultural programmes, showcasing their talent, enthusiasm, and creativity. Their active participation contributed significantly to the success of the celebrations. The programme concluded with a traditional Onam Sadhya, providing an opportunity for members and students to come together and celebrate the spirit of harmony and fellowship.

I place on record my sincere appreciation to the members, SICASA students, and all those who contributed towards the successful conduct of these programmes. Such initiatives strengthen our professional fraternity while fostering a sense of community and belonging.

September was also significant from an academic perspective, with the examinations being successfully completed. I commend all our students for their perseverance, discipline, and commitment throughout their preparation. I extend my very best wishes to all the candidates awaiting their results and sincerely hope

that their efforts culminate in well-deserved success.

As we commence the month of October, I encourage all our members and students to continue pursuing professional excellence, lifelong learning, ethical practice, and meaningful contribution to society. The rapidly evolving professional landscape calls upon us to remain informed, adaptable, and committed to the highest standards of our profession.

“Let every challenge strengthen our resolve, every opportunity expand our knowledge, and every achievement inspire us to reach greater heights.”

With renewed commitment and collective endeavour, let us continue to contribute towards the growth of our profession and the continued development of the ICAI Kottayam Branch.

Wishing all our members, students, and their families a productive, fulfilling, and successful month ahead

CA. Bimal C Sekhar
Chairman (2026-27)
Kottayam Branch of SIRC of ICAI



GST UPDATES

CA. AKHIL VARGHESE



1 Penalty under Section 129 not sustainable for failure to generate e-invoice where there is no intention to evade tax

The GST Appellate Tribunal has held that mere failure to generate an e-invoice under Rule 48(4) before commencement of transportation, by itself, does not justify penalty under Section 129 of the CGST Act in the absence of any finding of intention to evade tax. The Tribunal observed that although subsequent generation of the e-invoice does not erase the initial procedural lapse, the goods were transported under a tax invoice, E-Way Bill and LR, and there was no allegation that the documents

were fabricated, the goods differed from the documents or the consignee was fictitious. The subsequent generation of the e-invoice was also relevant in determining whether there was deliberate suppression. The Tribunal further held that payment made during detention proceedings cannot be treated as a voluntary admission of intention to evade tax. In view of the absence of any finding of intention to evade tax, the penalty imposed under Section 129(3) was set aside.

VLM Null Gruoup v. The Additional Commissioner – GST Appellate Tribunal – APL/98/LCK/2026

2 Value of principal's goods not includible in e-way bill value when goods are returned after job work

The GST Appellate Tribunal, Kerala has held that where goods belonging to the principal are returned by a job worker after completion of job work, the value of the original goods is not required to be included in the consignment value for the purpose of Rule 138 of the CGST Rules. The Tribunal observed that the supply by the job worker is only the job work service and, on a conjoint reading of Rule 138 and Section 15 of the CGST Act, the consignment value is to be determined accordingly. Where the job work

invoice contained the description, quantity and HSN of the goods, job work charges and applicable GST, the goods were accompanied by a valid tax invoice and a separate delivery challan was not required. Since the value of the job work invoice was below the threshold of Rs. 50,000/- under Rule 138(1), generation of an e-way bill itself was not mandatory. Accordingly, proceedings for defective/non-generation of e-way bill and the consequential penalty were set aside.

M/s Metalloids India, Pathanamthitta v. Commissioner of State Tax – GST Appellate Tribunal – Appeal No. APL/27/TVP/2026

3 Eligibility of ITC cannot be re-adjudicated in refund proceedings without determination under Section 73 or 74

The GST Appellate Tribunal, Ernakulam has held that where ITC has been availed in statutory returns, its eligibility cannot be questioned for the first time while adjudicating a refund claim under Section 54(3), without determining the ineligibility of such ITC through proceedings under Section 73 or 74 of the CGST Act. The Tribunal observed that there cannot be any disallowance of ITC dehors Sections 73/74 and, until an order is passed thereunder disallowing the credit, the ITC availed is presumed

to be in order. Relying on Circular No. 125/44/2019-GST, the Tribunal observed that where refund is proposed to be rejected on account of ineligible ITC, FORM GST RFD-08 should be issued under Section 54 read with Section 73 or 74, proposing both rejection of the corresponding refund and recovery of the ineligible ITC. A mere refund proceeding cannot be converted into a collateral proceeding for determining ITC eligibility. In view of the above, the rejection of refund was set aside.

Augustan Textile Colours v. Commissioner of State Tax, Kerala – GST Appellate Tribunal, Ernakulam – Appeal No. APL/23/ERN/2026

4 Reply submitted through e-mail cannot be ignored where taxpayer was disabled from filing reply on GST portal

The Allahabad High Court has held that where a taxpayer was unable to file a reply on the Common Portal and the detailed reply along with supporting documents was submitted through e-mail to the address provided by the Adjudicating Authority, such reply was required to be considered before passing an order under Section 74 of the CGST Act. The Court observed that once the reply had been received on the e-mail address provided by the Adjudicating Authority, the Authority

remained obligated to consider the same. Passing an order recording that no written submissions or reply had been filed, without considering the reply submitted through e-mail, constituted violation of principles of natural justice. The impugned order was therefore set aside on account of the fundamental procedural defect and the matter was remitted to the Adjudicating Authority for fresh hearing.

M/s Shakti Industries v. Directorate General of GST Intelligence, Lucknow & Ors. – Allahabad High Court – 2026:AHC:175304-DB

5 Expression “any person” under Section 122(1A) is not restricted to a taxable person

The Delhi High Court has held that the expression “any person” under Section 122(1A) of the CGST Act is not confined to a taxable or registered person and can extend to directors or other persons involved in the affairs of a company. The Court observed that penalty under Section 122(1A) can be imposed only when two cumulative conditions are established, namely, that the person has retained the benefit of a transaction covered by clauses (i), (ii), (vii) or (ix) of Section 122(1), and that such transaction was

conducted at his instance. The Court noted that the Legislature consciously used the expression “any person” in Section 122(1A), as distinct from “taxable person” and “registered person” used elsewhere in Section 122. The Court thus held that Section 122(1A) can extend to any person, whether or not registered or liable to be registered, provided the prescribed twin conditions are independently established.

Parag Garg v. Commissioner, Adjudication, CGST Delhi West – Delhi High Court – 2026:DHC:8390-DB

Compliance Calendar for the Month of October 2026

S.No.	Law	Compliance	Form / Return	Period / Applicability	Due Date
1	Income Tax	Deposit of TDS/TCS deducted or collected during September 2026, subject to special rules applicable to Government deductors	Challan	September 2026	7 October 2026
2	FEMA	Monthly reporting of actual External Commercial Borrowing transactions through AD Category-I Bank	ECB-2	September 2026; within prescribed working-day timeline	Within 7 working days from month-end
3	GST	Return by persons required to deduct TDS under GST	GSTR-7	September 2026	10 October 2026
4	GST	Statement by e-commerce operator required to collect TCS under GST	GSTR-8	September 2026	10 October 2026
5	GST	Statement of outward supplies by monthly filers	GSTR-1	September 2026	11 October 2026
6	GST	Quarterly statement of outward supplies by taxpayers opting for the QRMP Scheme	GSTR-1	July-September 2026 quarter	13 October 2026
7	GST	Return by Input Service Distributor	GSTR-6	September 2026	13 October 2026
8	Income Tax	Applicable certificates, statements and prescribed periodic compliances falling on the middle of the month	Applicable Form	September 2026 / quarter ended September 2026	15 October 2026
9	PF	Deposit of provident fund contribution and filing through Electronic Challan-cum-Return	ECR	September 2026	15 October 2026
10	ESI	Deposit of ESI contribution for September 2026	ESI Contribution	September 2026	15 October 2026
11	GST	Quarterly payment by composition taxpayers	CMP-08	July-September 2026 quarter	18 October 2026
12	GST	Return by non-resident taxable person	GSTR-5	September 2026, subject to earlier deadline where registration expires	20 October 2026
13	GST	Return by applicable OIDAR service provider	GSTR-5A	September 2026	20 October 2026
14	GST	Monthly summary return and payment of tax by monthly filers	GSTR-3B	September 2026	20 October 2026
15	Income Tax	Extended due date for furnishing tax audit report for specified non-transfer-pricing audit cases for AY 2026-27	Form 3CA/3CB with Form 3CD, as applicable	AY 2026-27	21 October 2026
16	SEBI	Quarterly shareholding pattern by applicable listed entities	Regulation 31(1) (b)	Quarter ended 30 September 2026	21 October 2026
17	GST	Quarterly GSTR-3B under QRMP for specified States and Union Territories falling in the first group	GSTR-3B	July-September 2026 quarter	22 October 2026
18	GST	Quarterly GSTR-3B under QRMP for specified States and Union Territories falling in the second group	GSTR-3B	July-September 2026 quarter	24 October 2026
19	GST	Payment through challan by QRMP taxpayers, where applicable for the relevant monthly period	PMT-06	Applicable monthly tax period	25 October 2026
20	GST	Statement of inward supplies by UIN holders for claiming refund, where applicable	GSTR-11	September 2026	28 October 2026
21	Companies Act	Filing of financial statements, where 30-day period from AGM expires on this date	AOC-4 / AOC-4 XBRL	Event-linked; depends upon date of AGM	30 days from AGM
22	LLP	Statement of Account and Solvency	LLP Form 8	FY 2025-26	30 October 2026
23	SEBI	Integrated Filing – Governance	Integrated Filing (Governance)	Quarter ended 30 September 2026	30 October 2026
24	SEBI	Reconciliation of Share Capital Audit Report	Applicable SEBI Depositories Regulations	Quarter ended 30 September 2026	30 October 2026
25	Companies Act	Half-yearly return relating to outstanding payments to micro and small enterprises, where applicable	MSME-1	April-September 2026	31 October 2026

S.No.	Law	Compliance	Form / Return	Period / Applicability	Due Date
26	Income Tax	Quarterly TDS/TCS statements and other applicable quarterly statements for quarter ended September 2026	Applicable pre-prescribed Forms	July-September 2026	31 October 2026
27	Income Tax	Tax audit report for assessee required to furnish report under Section 92E	Form 3CA/3CB with Form 3CD	AY 2026-27 – transfer-pricing cases	31 October 2026
28	Income Tax	Accountant's report in respect of international transactions and specified domestic transactions	Form 3CEB	AY 2026-27	31 October 2026
29	Income Tax	Other reports, certificates and statements linked to the 30 November return-filing category, wherever applicable	Applicable pre-prescribed Form	AY 2026-27	31 October 2026

GST Compliance Due Dates in October 2026

October is both a monthly and quarter-end GST compliance month. In addition to September monthly returns, taxpayers following quarterly filing under the QRMP Scheme have quarterly GSTR-1 and GSTR-3B obligations for the July-September 2026 quarter.

10 October 2026: GSTR-7 and GSTR-8

Persons required to deduct TDS under GST should furnish GSTR-7 for September 2026 by **10 October 2026**. E-commerce operators required to collect tax at source should furnish GSTR-8 for September 2026 by the same date.

11 October 2026: Monthly GSTR-1

Registered persons following monthly GSTR-1 filing are required to furnish details of outward supplies for September 2026 by **11 October 2026**.

13 October 2026: Quarterly GSTR-1 and GSTR-6

Taxpayers who have opted for quarterly GSTR-1 filing under QRMP should furnish GSTR-1 for the quarter ended 30 September 2026 by **13 October 2026**.

Input Service Distributors should also furnish GSTR-6 for September 2026 by 13 October 2026.

18 October 2026: CMP-08

Composition taxpayers should furnish the applicable statement-cum-challan in Form CMP-08 and discharge tax for the July-September 2026 quarter by **18 October 2026**.

20 October 2026: GSTR-3B, GSTR-5 and GSTR-5A

Monthly GSTR-3B for September 2026 is ordinarily due by **20 October 2026**.

GSTR-5 for a non-resident taxable person is also generally due by the 20th of the succeeding month. However, where the registration period expires earlier, the separate statutory timeline connected with expiry of registration must be considered.

Applicable OIDAR service providers should furnish GSTR-5A for September 2026 by 20 October 2026.

22 and 24 October 2026: Quarterly GSTR-3B Under QRMP

Taxpayers filing GSTR-3B quarterly under QRMP should pay particular attention to the State-wise deadlines. The due date for the July-September 2026 quarter is generally **22 October or 24 October 2026**, depending upon the State or Union Territory in which the principal place of business is situated.

Where a monthly payment through PMT-06 is required under the QRMP framework for the relevant period, the prescribed payment deadline should be monitored separately.

Income Tax Due Dates for October 2026

Income-tax compliance for October 2026 requires special care because obligations relating to Previous Year 2025-26 and Assessment Year 2026-27 continue to operate under the Income-tax Act, 1961, while current-period compliances may need to be read with the Income-tax Act, 2025 and Income-tax Rules, 2026, as applicable.

7 October 2026: TDS and TCS Deposit

Tax deducted or collected during September 2026 is generally required to be deposited with the Central Government by **7 October 2026**, subject to the separate statutory mechanism applicable to Government deductors and collectors.

21 October 2026: Extended Tax Audit Report Deadline

This is one of the most important compliance dates of October 2026.

CBDT, through Circular No. 07/2026 dated 28 September 2026, extended the specified date for furnishing the audit report for Assessment Year 2026-27 from **30 September 2026 to 21 October 2026** in the case of persons referred to at S. No. 2 in the Table below Explanation 2 to Section 139(1) of the Income-tax Act, 1961.

The extension principally covers the specified audit-category taxpayers to whom Section 92E does not apply. Accordingly, the tax audit report in Form 3CA/3CB read with Form 3CD, as applicable, should be furnished by **21 October 2026** for taxpayers covered by the extension.

ITR Deadline Extended to 21 November 2026

The corresponding return-filing deadline for the covered category has been extended from **31 October 2026 to 21 November 2026**.

Accordingly, 31 October 2026 should no longer be presented as the income-tax return deadline for the category covered by Circular No. 07/2026.

The relationship between the two revised dates is therefore:

Compliance	Earlier Due Date	Extended Due Date
Audit Report for specified non-TP audit cases	30 September 2026	21 October 2026
Return of Income for corresponding category	31 October 2026	21 November 2026

31 October 2026: Transfer Pricing and Connected Reports

The CBDT extension applicable to the specified non-transfer-pricing audit category should not automatically be applied to assessees required to furnish a report under Section 92E.

For an assessee required to furnish a report relating to international transactions or specified domestic transactions under Section 92E, the relevant audit and transfer-pricing reporting deadlines should therefore be separately monitored.

Important compliances include, where applicable:

1. Form 3CA/3CB with Form 3CD for the relevant tax audit;
2. Form 3CEB for international transactions and specified domestic transactions;
3. Form 3CE for applicable non-residents/foreign companies under Section 44DA;
4. Form 3CEJA relating to eligible investment funds under Section 9A;
5. Form 10DA relating to the deduction for additional employee cost under Section 80JJAA;
6. Form 66 for applicable tonnage-tax companies;
7. other audit reports, certificates and statements whose statutory filing date is linked to the 30 November return-filing category.

Each form should be checked independently because applicability depends upon the nature of the assessee, transaction and underlying provision.

PF and ESI Due Dates for October 2026

15 October 2026: PF Contribution and ECR

Employers covered by the Employees' Provident Funds legislation should deposit the applicable provident fund contribution for September 2026 and complete the corresponding ECR compliance by **15 October 2026**.

15 October 2026: ESI Contribution

Employers covered by ESI should deposit contribution relating to September 2026 by **15 October 2026**, subject to the applicable statutory provisions.

FEMA Compliance Due Dates for October 2026

ECB-2 Reporting for September 2026

Borrowers having reportable External Commercial Borrowings are required to report actual ECB transactions through their AD Category-I bank in Form ECB-2 within the prescribed period following the close of the month.

Since the RBI requirement operates by reference to **working days**, it is preferable not to treat a particular calendar date such as 9 October as a universal statutory deadline without checking the working-day computation for the relevant month.

Companies Act and LLP Due Dates for October 2026

AOC-4 and AOC-4 XBRL: Event-Linked Deadline

The filing of financial statements in Form AOC-4 or AOC-4 XBRL, as applicable, is linked to the date of the annual general meeting.

Accordingly, **29 October 2026 should not be treated as a universal AOC-4 deadline**. Companies should compute the applicable filing date with reference to their actual AGM date and the statutory period prescribed for filing financial statements.

ADT-1: Appointment or Reappointment of Auditor

Form ADT-1 is similarly an event-linked compliance. The filing period should be calculated with reference to the appointment of the auditor rather than presenting 15 October as a universal annual due date.

30 October 2026: LLP Form 8

Applicable LLPs should furnish their Statement of Account and Solvency in **LLP Form 8 by 30 October 2026** for FY 2025-26, subject to the applicable statutory framework and any extension granted by MCA.

31 October 2026: MSME-1

Companies to which the reporting requirement applies should furnish the half-yearly MSME-1 return for the period April to September 2026 by **31 October 2026**. MSME-1 is a **half-yearly** compliance and should not be classified as an annual filing.

SEBI Compliance Due Dates for October 2026

21 October 2026: Shareholding Pattern

Applicable listed entities should furnish the quarterly shareholding pattern under Regulation 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations within the prescribed period from the end of the quarter.
For the quarter ended 30 September 2026, the relevant deadline is **21 October 2026**.

30 October 2026: Integrated Filing – Governance

Integrated Filing (Governance), covering the prescribed governance-related periodic disclosures, is required within **30 days from the end of the quarter**. Accordingly, the filing for the quarter ended 30 September 2026 falls due on **30 October 2026**. This is a **quarterly compliance** and should not be classified as annual.

30 October 2026: Reconciliation of Share Capital Audit

Applicable listed entities should also monitor the quarterly Reconciliation of Share Capital Audit Report requirement under the relevant SEBI Depositories framework. For the quarter ended 30 September 2026, the relevant compliance falls at the end of October 2026.

Regulation 40(9)/(10) Certificate Removed From Calendar

The earlier compliance calendar included a 15 October entry for the certificate relating to transfer of securities under Regulation 40(9)/(10). That entry has not been carried forward in this reconstructed calendar because the earlier periodic filing requirement has undergone regulatory rationalisation and should not be presented as a current October 2026 compliance merely on the basis of historical calendars.

Most Important Compliance Dates in October 2026

Date	Key Compliance	Date	Key Compliance
7 October	TDS/TCS deposit for September 2026	21 October	Extended AY 2026-27 Tax Audit Report deadline ; SEBI shareholding pattern
10 October	GSTR-7 and GSTR-8	22/24 October	Quarterly GSTR-3B under QRMP, depending upon State/UT
11 October	Monthly GSTR-1	30 October	LLP Form 8; SEBI Integrated Filing (Governance); Reconciliation of Share Capital Audit
13 October	Quarterly GSTR-1 and GSTR-6	31 October	MSME-1; applicable TDS/TCS quarterly statements; transfer-pricing and connected income-tax reports
15 October	PF, ESI and applicable Income Tax compliances	21 November	Extended AY 2026-27 ITR deadline for specified non-TP audit cases
18 October	CMP-08 for July-September quarter		
20 October	Monthly GSTR-3B, GSTR-5 and GSTR-5A		

CPE Seminar



ONAM CELEBRATIONS





