



THE INSTITUTE OF CHARTERED ACCOUNTANTS OF INDIA

GST & INDIRECT TAXES COMMITTEE

GST ANNUAL RETURN | Form GSTR 9 & 9C

Walk through for CAs, the Nation Builders

- **CA. Shaikh Abdul Samad. A**

SCOPE & INTRODUCTION



SCOPE & INTRODUCTION

- **What is Form GSTR - 9?**
(Ref: Sec. 44 read with Rule 80)
- **What is the purpose of Form GSTR - 9?**
(Ref: PIB's Press Release dated 03.06.2019)
- **Why is Form GSTR - 9C required?**
(Difference in values accounted in books vis-a-vis value reported in returns)
- **How do Form GSTR - 9 and Form GSTR - 9C differ?**
(GSTR 9 is for reporting the transaction. GSTR 9C is for reconciling the transaction so reported with BoA)

→ Supply of Goods, Services or Works.



V/s.



→ Transfer of Ownership of Goods.
→ Completion of the Services / Works

WHO MUST FILE ANNUAL RETURNS?

Section 44(1) of the CGST Act mandates electronic filing of FORM GSTR-9 for most registered persons, with specific exemptions carved out by statute and notification.



Mandatory Filers

Every registered person under GST must file annual return in FORM GSTR-9 electronically through the GST portal, subject to exemptions specified in the Act.



Statutory Exemptions

- Input Service Distributors (ISD),
- persons deducting TDS under Section 51,
- persons collecting TCS under Section 52,
- casual taxable persons, and
- non-resident taxable persons



Special Category

Composition scheme taxpayers must file FORM GSTR-9A instead of GSTR-9, as per the proviso to Rule 80(1) of the CGST Rules.

Turnover-Based Exemption for FY 2024-25: N.No. 15/2025-C.T. dated 17.09.2025 provides significant relief for taxpayers having aggregate turnover not exceeding **Rs. 2 crore** from filing annual returns

UNDERSTANDING "AGGREGATE TURNOVER"

Section 2(6) of the CGST Act defines aggregate turnover as the cornerstone for determining various compliance thresholds, including annual return filing obligations. This all-India, PAN-based computation requires precision to avoid misclassification.

01

Statutory Definition

Aggregate value of all taxable supplies, exempt supplies, exports of goods or services, and inter-State supplies of persons having the same PAN, computed on all-India basis.

Exclusions : Inward supplies on which tax is payable on reverse charge basis

02

Computation Basis

All-India aggregation across all registrations under the same PAN, not state-wise or registration-wise computation, ensuring unified threshold assessment.

Common Aggregate Turnover Pitfalls

Misunderstanding: Taxpayers often exclude exempt supplies from aggregate turnover calculation, assuming only taxable supplies count toward thresholds.

Clarification: Section 2(6) explicitly includes exempt supplies in aggregate turnover. Examples include interest income on loans or deposits, and supplies of non-taxable goods like alcoholic beverages for human consumption.

Misunderstanding: Computing turnover separately for each state registration under the belief that thresholds apply state-wise.

Clarification: Aggregate turnover is computed on an all-India basis for all registrations under the same PAN, not individual state-wise computation.

PURPOSE OF FORM GSTR - 9

Collate the data from the statement and returns filed during the Financial Year by the registered person – **NO.**

CBIC PRESS RELEASE DATED 03.07.2019 :

- ❖ ***Permitting to rectify*** the error, omission, duplication and commissions in the statement and returns filed by the registered person.
- ❖ ***Permission to make the short payment voluntarily*** arising due to the above-referred reasons.

***Section 73 of the CGST Act, 2017 provides a **unique opportunity of self-correction to the registered person** i.e. if a registered person has not paid, short paid or has erroneously obtained/been granted a refund or has wrongly availed or utilized input tax credit then before the service of a notice by any tax authority, the registered person may pay the amount of tax with interest.

WHY FORM GSTR 9C?



Eligibility Criteria Under Section 44

Legal Mandate:

All registered persons under **Section 44** of CGST Act, 2017 read with **Rule 80** of CGST Rules, 2017 require **mandatory self-certification for annual compliance**.

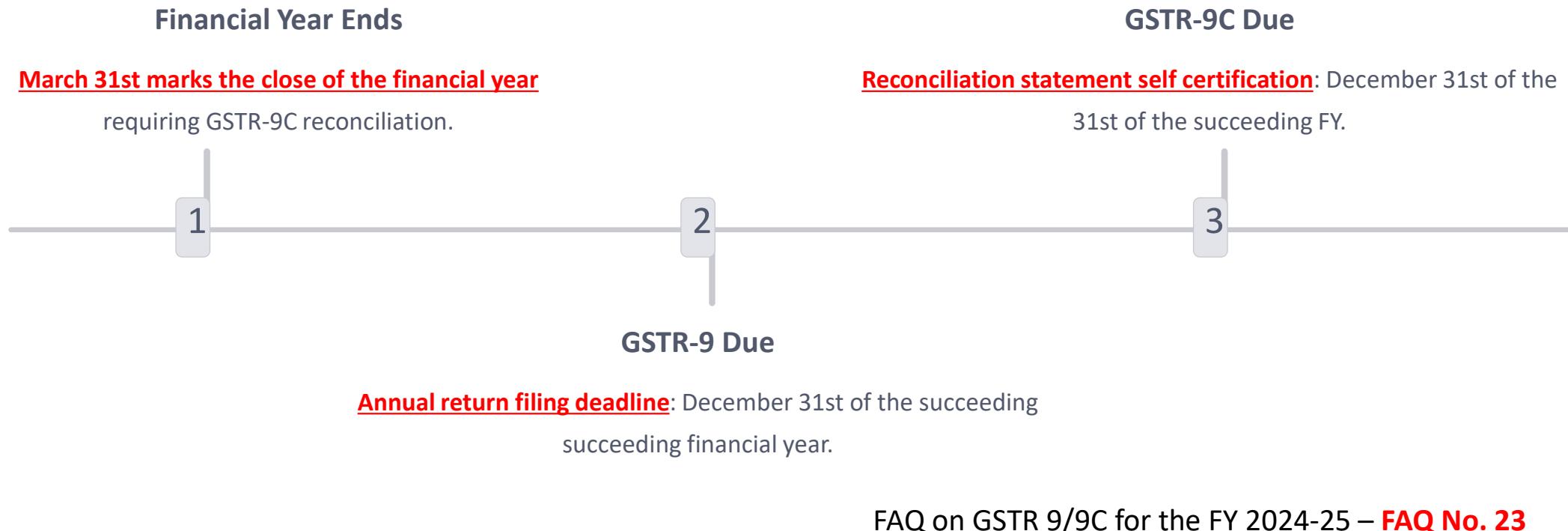
Turnover Threshold:

Aggregate turnover during a financial year **exceeding Rs. 5 crore**, as per Rule 80 (3) of the CGST Act, 2017.

Special Cases to Consider:

- **SEZ units require separate computation to prevent double-counting.**
- Registered person, other than: → an Input Service Distributor, → a person paying tax U/s. 51 or 52, → a casual taxable person → a NRTP

FILING TIMELINES AND COMPLIANCE DEADLINES



Late Fees

Late filing incurs **₹200 per day** (₹100 CGST + ₹100 SGST) under Section 47, capped at 0.25% of annual turnover.

Notification No. 07/2023 C.T. dated 31.03.2023 – up to 5 Cr. – **Rs. 25.00/day** | 5 Cr. to 25 Cr. – **Rs. 50.00/ day** | above 25 Cr. – **Rs. 100/ day**.

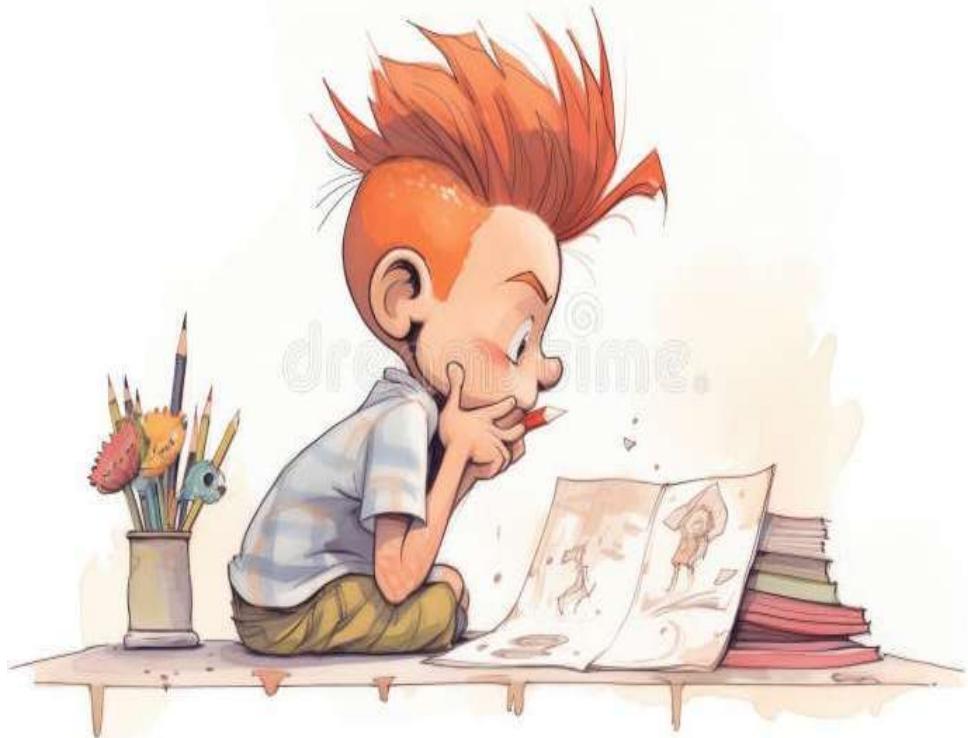
Parallel late fees under SGST head.

FAQ on GSTR 9/9C for the FY 2024-25 – [**FAQ No. 23**](#)

UNDERSTANDING

FORM GSTR 9 | CONTENT & REQUIREMENT

FORM GSTR 9 | REQUIREMENT



OUTWARD SUPPLY

INWARD SUPPLY LIABLE FOR
RCM

REPORT PAY-OUT

INPUT TAX CREDIT TAKEN

2A. *In the Table, against serial numbers **4, 5, 6 and 7**, the tax payers shall report the values pertaining to the financial year only for which annual return is being filed. **The value pertaining to the preceding financial year shall not be reported here until unless specifically required.***

REPORTING

FORM GSTR 9 | OUTWARD SUPPLY
Table No. 4, 5, 10 & 11



REPORTING PAYOUT AGAINST ADVANCE RECEIPT



FORM GSTR 9 | OUTWARD SUPPLY

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 Tax / UT Tax	Integrated Tax	Cess
4	Details of advances, inward and outward supplies made during the financial year on which tax is payable					
A	Supplies made to un-registered persons (B2C)					
B	Supplies made to registered persons (B2B)					
C	Zero rated supply (Export) on payment of tax (except supplies to SEZs)					
D	Supply to SEZs on payment of tax					
E	Deemed Exports					
F	Advances on which tax has been paid but invoice has not been issued (not covered under (A) to (E) above)					
G	Inward supplies on which tax is to be paid on reverse charge basis					
H	Sub-total (A to G1 above)	-	-	-	-	-

ADVANCES AND IT'S ADJUSTMENT IN BOOKS OF ACCOUNTS

PARTICULARS	ASS_V	CGST	SGST
Opening Balance	45,000.00	4,050.00	4,050.00
<u>Add:</u>			
Advances Received	50,000.00	4,500.00	4,500.00
<u>Less:</u>			
Adjustment by issue of			
→ Tax Invoice	64,500.00	5,805.00	5,805.00
→ Refund Voucher	<u>2,500.00</u>	<u>225.00</u>	<u>225.00</u>
<i>Sub - Total</i>	<i>67,000.00</i>	<i>6,030.00</i>	<i>6,030.00</i>
Balance Closing Balance	28,000.00	2,520.00	2,520.00

Facts:

→ Adjustment Break-up in the BoA:

- Opening Balance : Rs. 32,000.00
- Current FY Advances : Rs. 35,000.00

TOTAL : Rs. 67,000.00

→ In Form GSTR – 1

Advances received reported in **Table No. 11.A.1, 11.A.2**

Advances Adjustment reported in **Table No. 11.B.1, 11.B.2**

→ In Form GSTR – 3B

Outward taxable supplies (other than ZR, Nil, E) in Entry 3.1.a

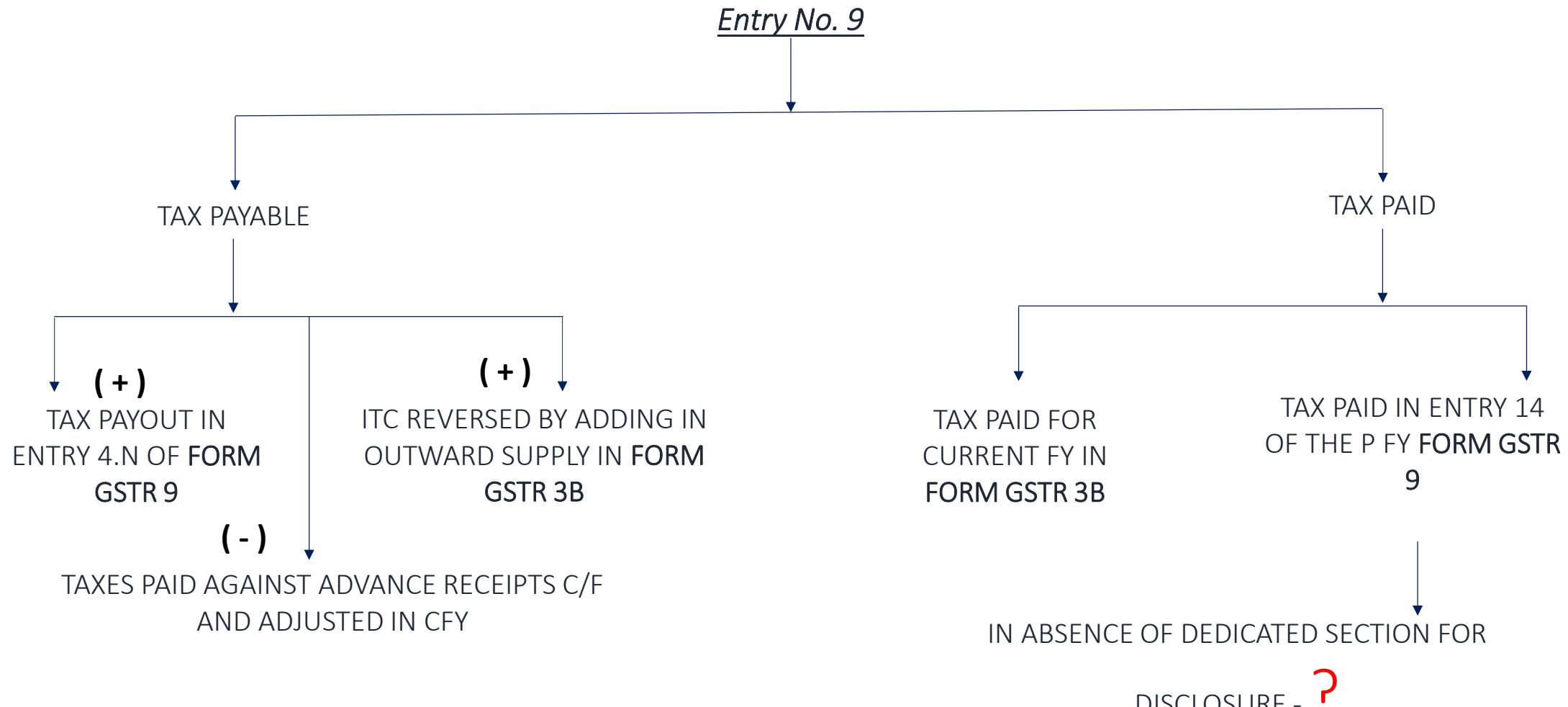
In Form GSTR – 9 & 9C = ?

REPORTING

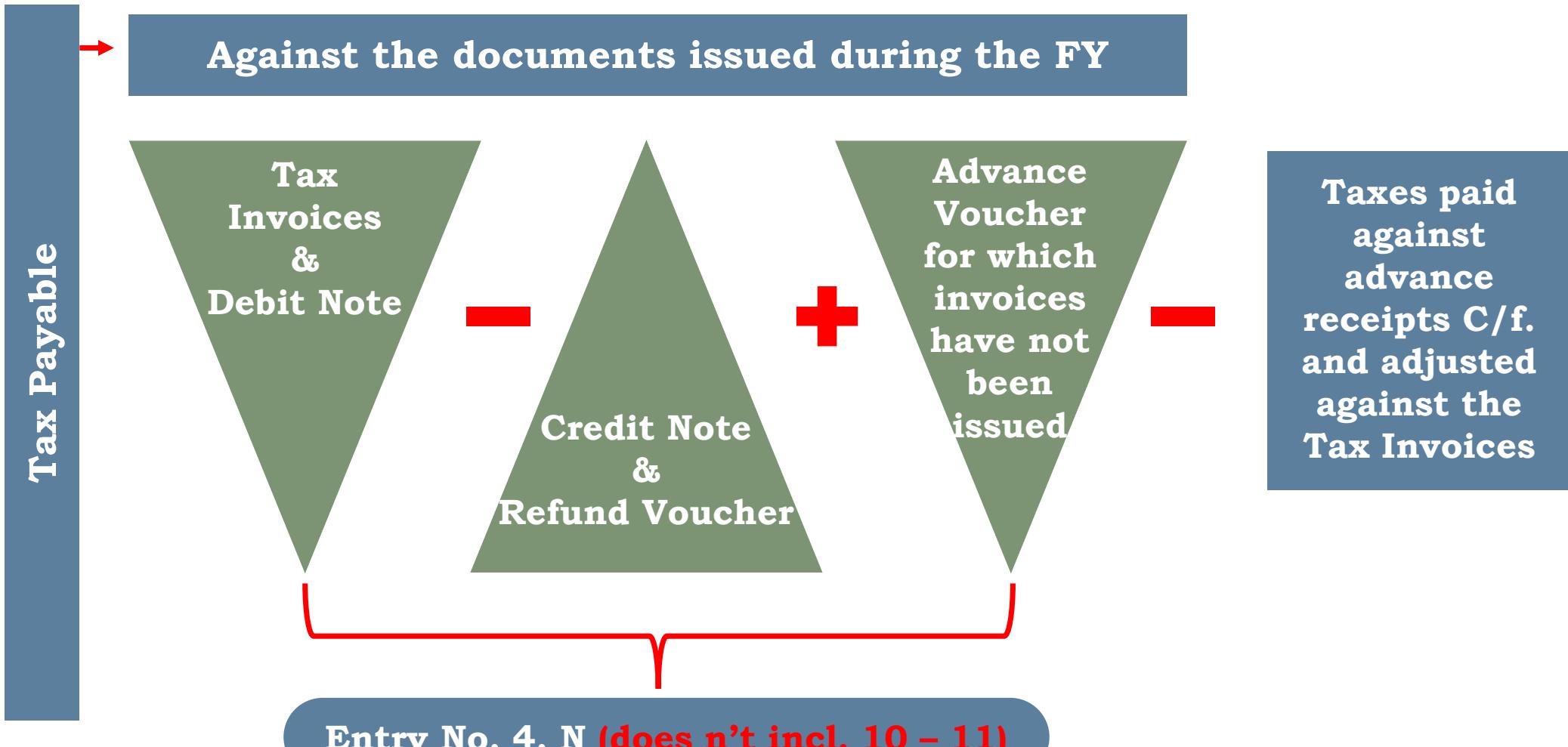
FORM GSTR 9 | PAY-OUT
Table No. 9

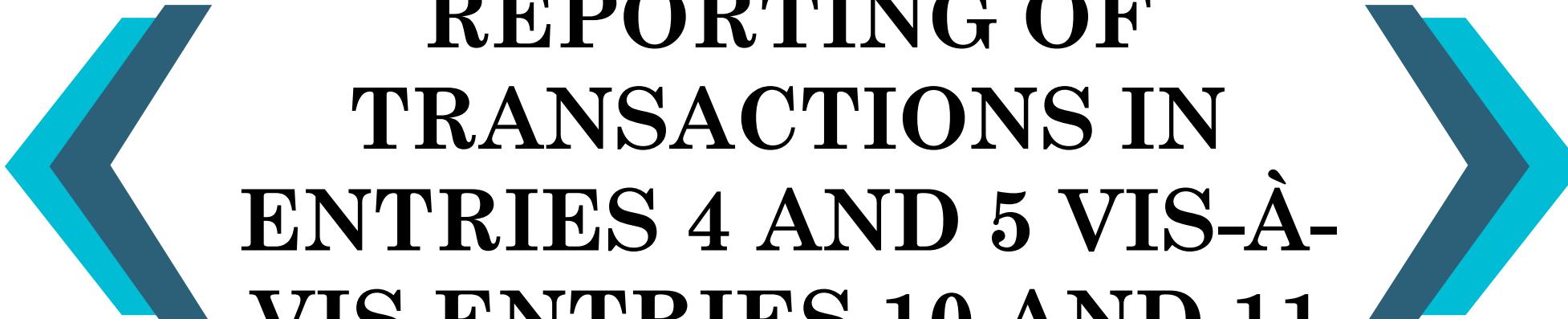
FORM GSTR 9 | PAY-OUT

FORM GSTR 9 | PAY-OUT



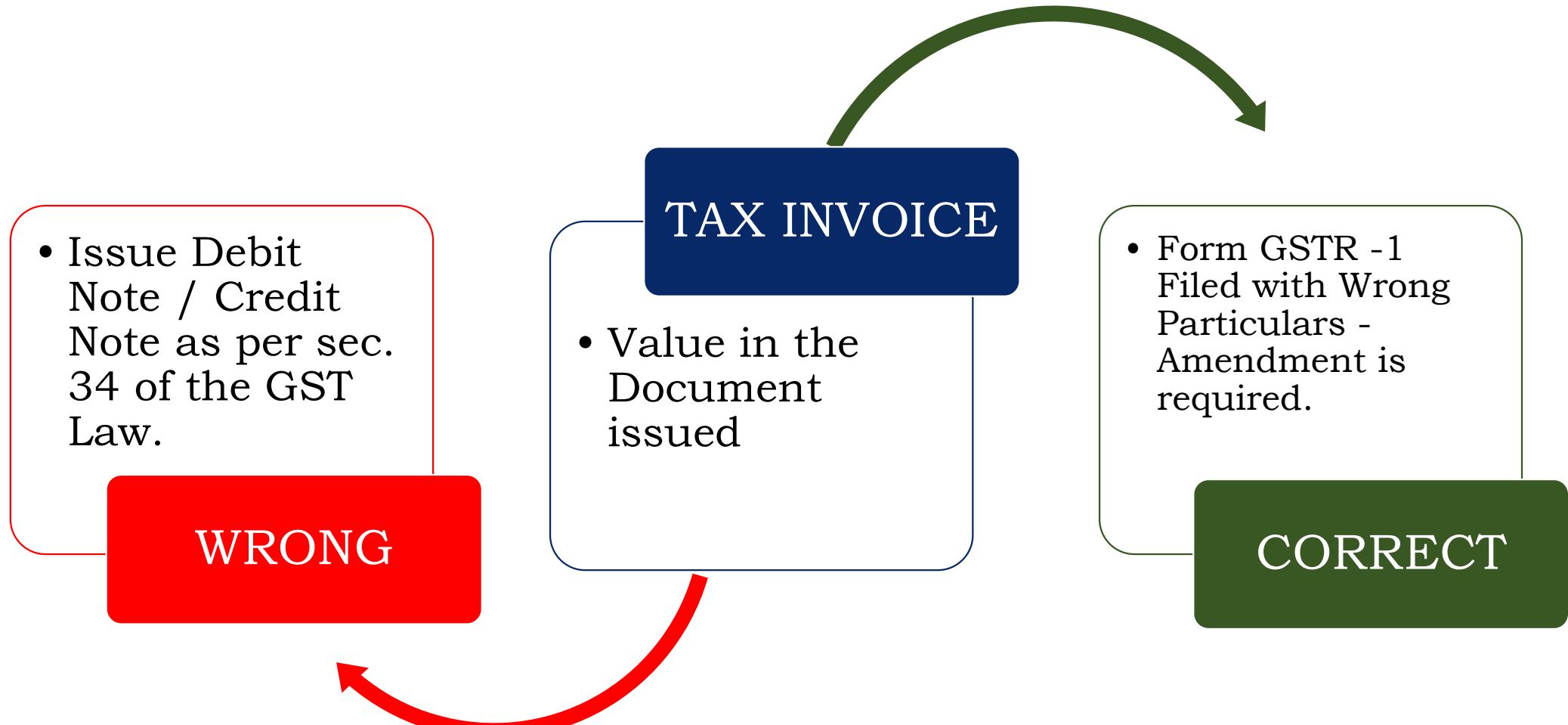
FORM GSTR 9 | PAY-OUT



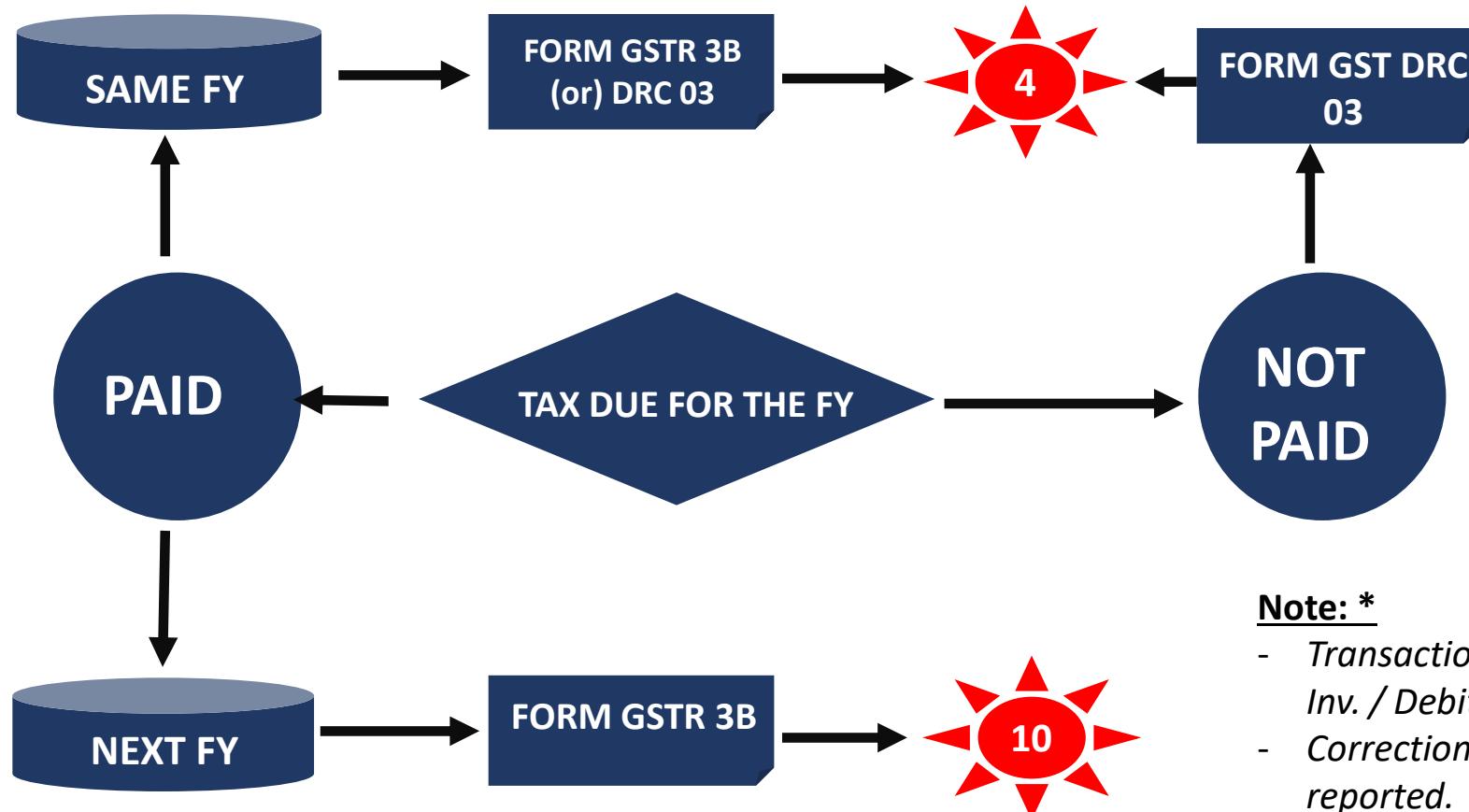


REPORTING OF TRANSACTIONS IN ENTRIES 4 AND 5 VIS-À- VIS ENTRIES 10 AND 11

AMENDMENT VIS – A- VIS DEBIT NOTE / CREDIT NOTE.



UPWARD AMENDMENT, REPORTING OF SUPPLY – TAX INVOICE & DEBIT NOTE



COVERAGE:

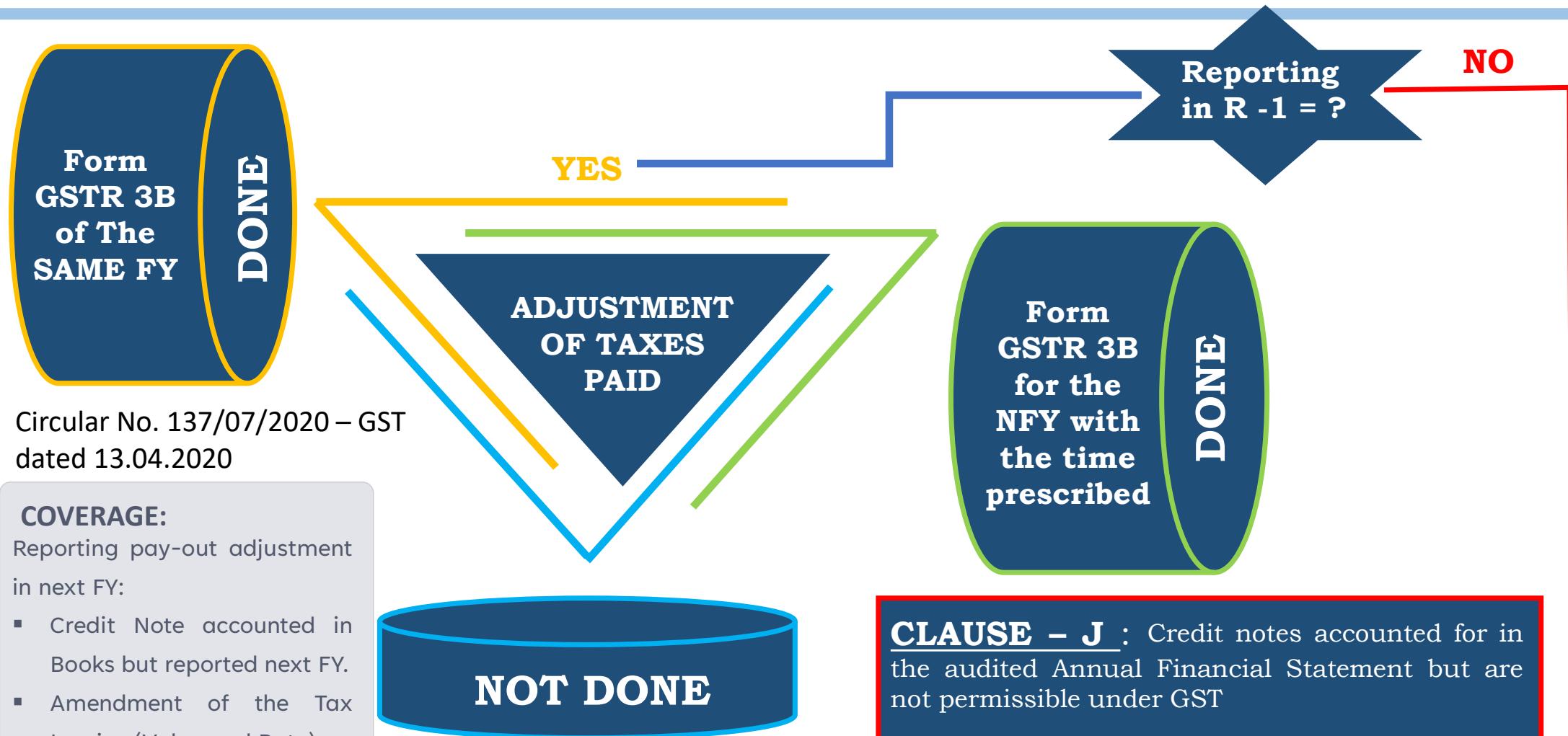
Reporting pay-out in next FY:

- Fresh Supply – Tax Invoice.
- Debit Note accounted in Books but reported next FY.
- Amendment of the Tax Invoice/Debit Note (Value and Rate)

Note: *

- *Transaction missed reporting. (Tax Inv. / Debit Note).*
- *Correction in Transaction already reported.*

DOWNWARD AMENDMENT, REPORTING OF SUPPLY – CREDIT NOTE





EXEMPTION VIS-À-VIS NON-GST SUPPLY

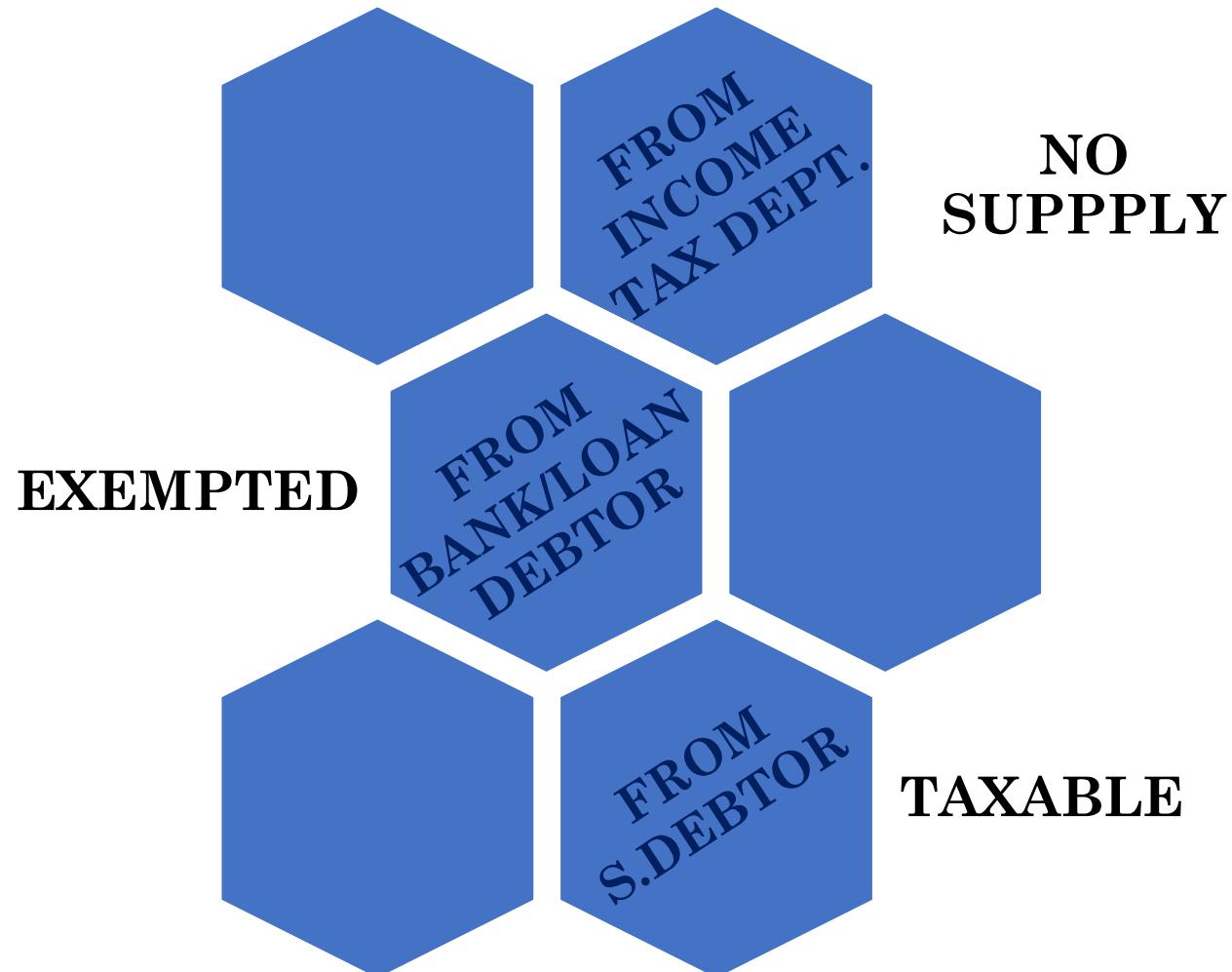


FORM GSTR 9 | OUTWARD SUPPLY

	Nature of Supplies	Taxable Value	Central Tax	State Tax / UT Tax	Integrated Tax	Cess
1	2	3	4	5	6	
5	Details of Outward supplies made during the financial year on which tax is not payable					
A	Zero rated supply (Export) without payment of tax					
B	Supply to SEZs without payment of tax					
C	Supplies on which tax is to be paid by the recipient on reverse charge basis					
D	Exempted Ω					
E	Nil Rated					
F	Non-GST supply Ω					
G	Sub-total (A to F above)	-	-	-	-	-

- Rul. 96A of the CGST Rules, 2017
- Execution of LUT
- Circular No. 37/11/2018 – GST dated 15.03.2018
- Sec. 17 (5) – Exempt supply – RCM
- Notification No. 40/2017 & No. 45/2017





INTEREST INCOME IN PROFIT AND LOSS ACCOUNTS

Circular No. 178/10/2022-GST

9. *ancillary to and naturally bundled with the principal supply such as of electricity, water, telecommunication, cooking gas, insurance etc. it should be assessed at the same rate as the principal supply.*

REPORTING

FORM GSTR 9 | INWARD SUPPLY LIABLE
FOR RCM

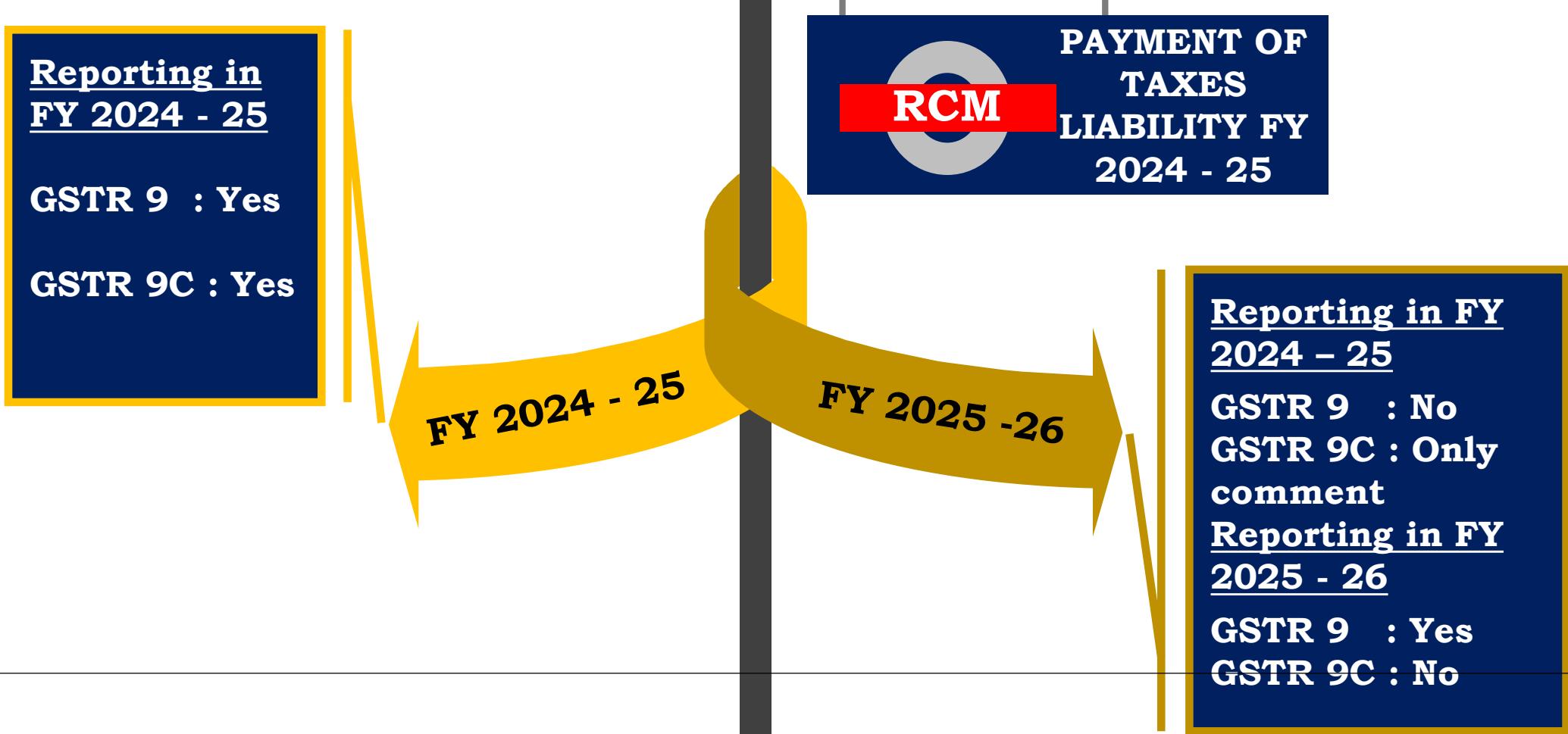
FORM GSTR 9 | OUTWARD SUPPLY

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 Tax / UT Tax	Integrated Tax	Cess
4	Details of advances, inward and outward supplies made during the financial year on which tax is payable					
A	Supplies made to un-registered persons (B2C)					
B	Supplies made to registered persons (B2B)					
C	Zero rated supply (Export) on payment of tax (except supplies to SEZs)					
D	Supply to SEZs on payment of tax					
E	Deemed Exports					
F	Advances on which tax has been paid but invoice has not been issued (not covered under (A) to (E) above)					
G	Inward supplies on which tax is to be paid on reverse charge basis					
H	Sub-total (A to G1 above)	-	-	-	-	-

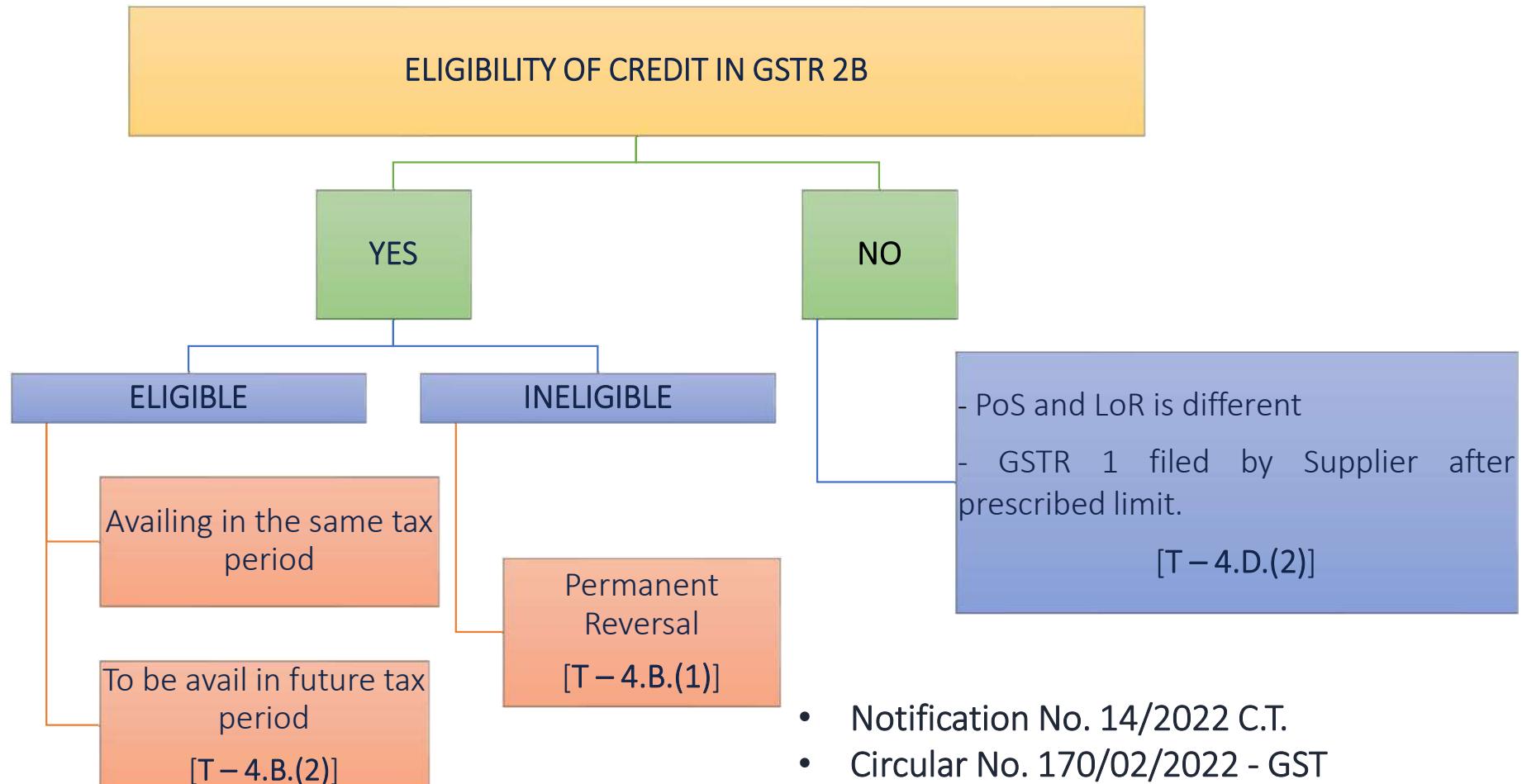
FORM GSTR 9 | INWARD SUPPLY LIABLE FOR RCM



REPORTING

FORM GSTR 9 | INPUT TAX CREDIT TAKEN
Table No. 6, 7 & 8

CIRCULAR No. 170/02/2022 - GST



FORM GSTR 9 | INPUT TAX CREDIT TAKEN

6 Details of ITC availed during the financial year					
A	Total amount of input tax credit availed through FORM GSTR-3B (sum total of Table 4A of FORM GSTR-3B)		<Auto>	<Auto>	<Auto>
A1	<i>ITC of preceding financial year availed the financial year (which is included in 6A above) other than ITC reclaimed under rule 37 and rule 37A</i>				
A2	Net ITC of the financial year =(A-A1)				
B	<i>Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)</i>	Inputs Ω Capital Goods Ω Input Services			
C	Inward supplies received from <u>unregistered persons</u> liable to reverse charge (other than B above) on which tax is paid & ITC availed Ω	Inputs Ω Capital Goods Ω Input Services			
D	Inward supplies received from <u>registered persons</u> liable to reverse charge (other than B above) on which tax is paid and ITC availed Ω	Inputs Ω Capital Goods Ω Input Services			
E	<u>Import of goods</u> (including supplies from SEZs)	Inputs Ω Capital Goods			
F	<u>Import of services</u> (excluding inward supplies from SEZs)				
G	Input Tax credit received from <u>ISD</u>				
H	<u>Amount of ITC reclaimed (other than B above) under the provisions of the Act</u>				
I	Sub-total (B to H above)		-	-	-
J	Difference (I - A above)				

FORM GSTR 9 | INPUT TAX CREDIT TAKEN

6	Details of ITC availed during the financial year				
K	Transition Credit through TRAN-I (including revisions if any)				
L	Transition Credit through TRAN-II				
M	<u>ITC availed through ITC-01, ITC 02 and ITC02A (other than GSTR-3B and TRAN Forms)</u>				
N	Sub-total (K to M above)	-	-	-	-
O	Total ITC availed (I + N above)	-	-	-	-

- Registration within 30 days
- Voluntary registration
- Ceases to composition levy person
- Exempt supply of goods or services

FORM GSTR 9 | INPUT TAX CREDIT TAKEN

	Description	Central Tax	State Tax / UT Tax	Integrated Tax	Cess
1		3	4	5	6
7	Details of ITC Reversed and Ineligible ITC for the financial year				
A & A1	As per Rule 37 & 37A				
A2 & B	As per Rule 38 & 39				
C	As per Rule 42				
D	As per Rule 43				
E	As per section 17(5)				
F	Reversal of TRAN-I credit Ψ				
G	Reversal of TRAN-II credit Ψ				
H	Other reversals (pl. specify) Ω				
I	Total ITC Reversed (Sum of A to H above)	-	-	-	-
J	Net ITC Available for Utilization (6O - 7I)	-	-	-	-

→ Reversal will be subject to interest as per sub section (1) of section 50

FORM GSTR 9 | INPUT TAX CREDIT TAKEN

8	Other ITC related information				
A	ITC as per GSTR-2B (Table 3 (I) thereof)	<Auto>	<Auto>	<Auto>	<Auto>
B	ITC as per sum total of 6(B) above	<Auto>	<Auto>	<Auto>	<Auto>
C	ITC on inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs) received during the financial year but availed in the next financial year up to specified period.				
D	Difference [A-(B+C)]	<Auto>	<Auto>	<Auto>	<Auto>
E	ITC available but not availed (out of D)				
F	ITC available but ineligible (out of D)				
G	IGST paid on import of goods (including supplies from SEZ)				
H	IGST credit availed on import of goods (as per 6(E) above)				
H1	IGST Credit availed on Import of goods in next financial year				
I	Difference (G-H)				
J	ITC available but not availed on import of goods (Equal to I)				
K	Total ITC to be lapsed in current financial year (E + F + J)	<Auto>	<Auto>	<Auto>	<Auto>

All Other ITC

PFY			CFY				
C	CR	CRR	C	CR	CRR	NOT CLAIMED	
6A1	No Report ing	6A1 - Once	6B	Perma nently	Temporarily	6B, 7H & 6H	Claimed NFY – 8.C
Reversal will be reported as difference in T. 6J and should not be reported in T. 7			6B & 7	Claimed NFY	Not Claimed	6B, 7H, 12 & 13	Missee d – 8.E/F

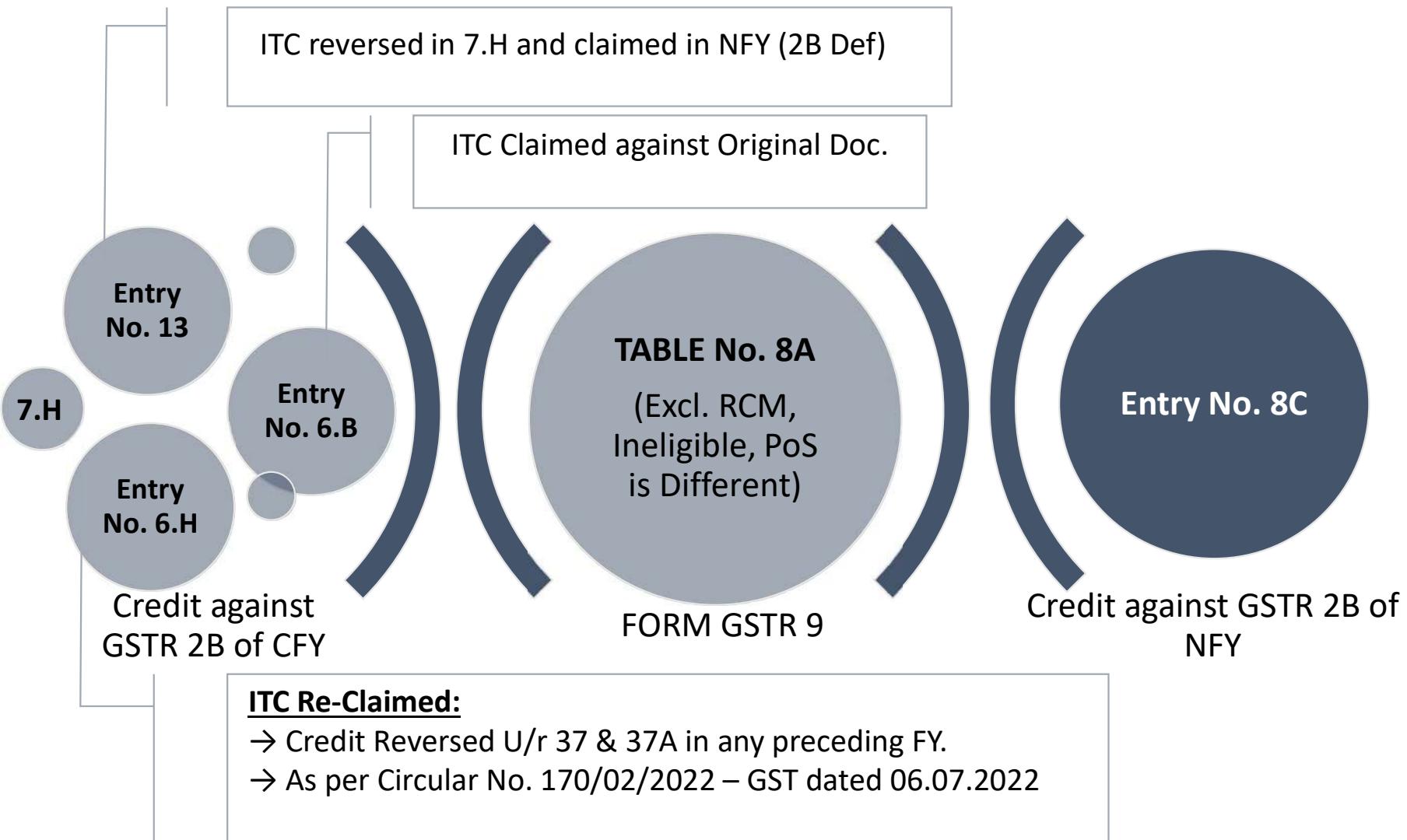
PFY – Previous Financial Year

CFY – Current Financial Year

C – Claimed

CR – Claimed & Reversed.

CRR- Claimed, Reversed and Re-claimed



RECONCILIATION

FORM GSTR 9C | TURNOVER RECO

FORM GSTR 9C | TURNOVER RECO

5 Reconciliation of Gross Turnover

A	Turnover (including exports) as per <u>audited financial statements for the State / UT</u> (For multi-GSTIN units under same PAN the turnover shall be derived from the audited Annual Financial Statement)	
B	Unbilled revenue at the beginning of Financial Year	(+)
C	Unadjusted advances at the end of the Financial Year	(+)
D	Deemed Supply under Schedule I	(+)
E	Credit Notes issued after the end of the financial year but reflected in the annual return	(-)
F	Trade Discounts accounted for in the audited Annual Financial Statement but are not permissible under GST	(+)
G	Turnover from April 2017 to June 2017	(-)
H	Unbilled revenue at the end of Financial Year	(-)
I	Unadjusted Advances at the beginning of the Financial Year	(-)
J	Credit notes accounted for in the audited Annual Financial Statement but are not permissible under GST	(+)
K	Adjustments on account of supply of goods by SEZ units to DTA Units	(-)
L	Turnover for the period under composition scheme	(-)
M	Adjustments in turnover under section 15 and rules thereunder	(+/-)
N	Adjustments in turnover due to foreign exchange fluctuations	(+/-)
O	Adjustments in turnover due to reasons not listed above	(+/-)
P	Annual turnover after adjustments as above	→

UNDERSTANDING UNBILLED REVENUE

RENT LEDGER

Date	Particulars	Debit	Credit
01-04-2024	By Unbilled Revenue - Mar 24	20,000.00	
10-04-2024	By Salman Khan		30,000.00
	<i>Being Rent for the month of Mar 24</i>		
10-05-2024	By Salman Khan		30,000.00
	<i>Being Rent for the month of Apr 24</i>		
10-06-2024	By Salman Khan		30,000.00
10-07-2024	By Salman Khan		30,000.00
10-08-2024	By Salman Khan		30,000.00
10-09-2024	By Salman Khan		30,000.00
10-10-2024	By Salman Khan		30,000.00
10-11-2024	By Salman Khan		30,000.00
10-12-2024	By Salman Khan		30,000.00
10-01-2025	By Salman Khan		33,000.00
10-02-2025	By Salman Khan		33,000.00
10-03-2025	By Salman Khan		33,000.00
31-03-2025	By Unbilled Revenue - Mar 25		22,000.00
	Sub Total	20,000.00	3,91,000.00
	Closing Balance	3,71,000.00	-
	TOTAL	3,91,000.00	3,91,000.00

→ As per Books the Rent Income = Rs. 3,71,000.00

→ As per Outward Register the Ass. Value = Rs. 3,69,000.00

$[(30,000 \times 9) + (33,000 \times 3)]$

Hence this difference to be explained

ADVANCES AND IT'S ADJUSTMENT IN BOOKS OF ACCOUNTS

PARTICULARS	ASS_V	CGST	SGST
Opening Balance	45,000.00	4,050.00	4,050.00
<u>Add:</u>			
Advances Received	50,000.00	4,500.00	4,500.00
<u>Less:</u>			
Adjustment by issue of			
→ Tax Invoice	64,500.00	5,805.00	5,805.00
→ Refund Voucher	<u>2,500.00</u>	<u>225.00</u>	<u>225.00</u>
<i>Sub - Total</i>	<i>67,000.00</i>	<i>6,030.00</i>	<i>6,030.00</i>
Balance Closing Balance	28,000.00	2,520.00	2,520.00

Facts:

→ Adjustment Break-up in the BoA:

- Opening Balance : Rs. 32,000.00
- Current FY Advances : Rs. 35,000.00

TOTAL : Rs. 67,000.00

→ In Form GSTR – 1

Advances received reported in **Table No. 11.A.1, 11.A.2**

Advances Adjustment reported in **Table No. 11.B.1, 11.B.2**

→ In Form GSTR – 3B

Outward taxable supplies (other than ZR, Nil, E) in Entry 3.1.a

In Form GSTR – 9 & 9C = ?

FORM GSTR 9C | TURNOVER RECO

7	Reconciliation of Taxable Turnover	
A	Annual turnover after adjustments (from 5P above)	-
B	Value of Exempted, Nil Rated, Non-GST supplies, No-Supply turnover	-
C	Zero rated supplies without payment of tax	-
D	Supplies on which tax is to be paid by the recipient on reverse charge basis	-
D1	<i>Supplies on which tax is to be paid by e-commerce operators as per sub-section (5) of section 9 [Supplier to report]</i>	-
E	Taxable turnover as per adjustments above (A-B-C-D)	-

Taxable turnover as declared in Table (4N- 4G) + (10-11) of the Annual Return (GSTR9) shall be declared (F).

FORM GSTR 9C | PAYOUT RECO

9 Reconciliation of rate wise liability and amount payable thereon						
	Description	Taxable Value	Tax payable			
			Central tax	State tax / UT tax	Integrated Tax	Cess, if applicable
	1	2	3	4	5	6
A	5%					
B	5% (RC)					
C	12%					
D	12% (RC)					
E	18%					
F	18% (RC)					
G	28%					
H	28% (RC)					
I	3%					
J	0.25%					
K ***	0.1%					
L	Interest					
M	Late Fee					
N	Penalty					
O	Others					
P	Total amount to be paid as per tables above					

Note: ***

K-1: Others

K-2: Supplies on which e-commerce operator is required to pay tax as per sub-section (5)

Of section 9 [E-commerce operator to report]

FORM GSTR 9C | ITC RECO

12 Reconciliation of Net Input Tax Credit (ITC)

A	ITC availed as per audited Annual Financial Statement for the State/ UT (For multi-GSTIN units under same PAN this should be derived from books of accounts)	
B	ITC booked in earlier Financial Years claimed in current Financial Year	(+)
C	ITC booked in current Financial Year to be claimed in subsequent Financial Years	(-)
D	ITC availed as per audited financial statements or books of account	→

RECONCILIATION OF ITC

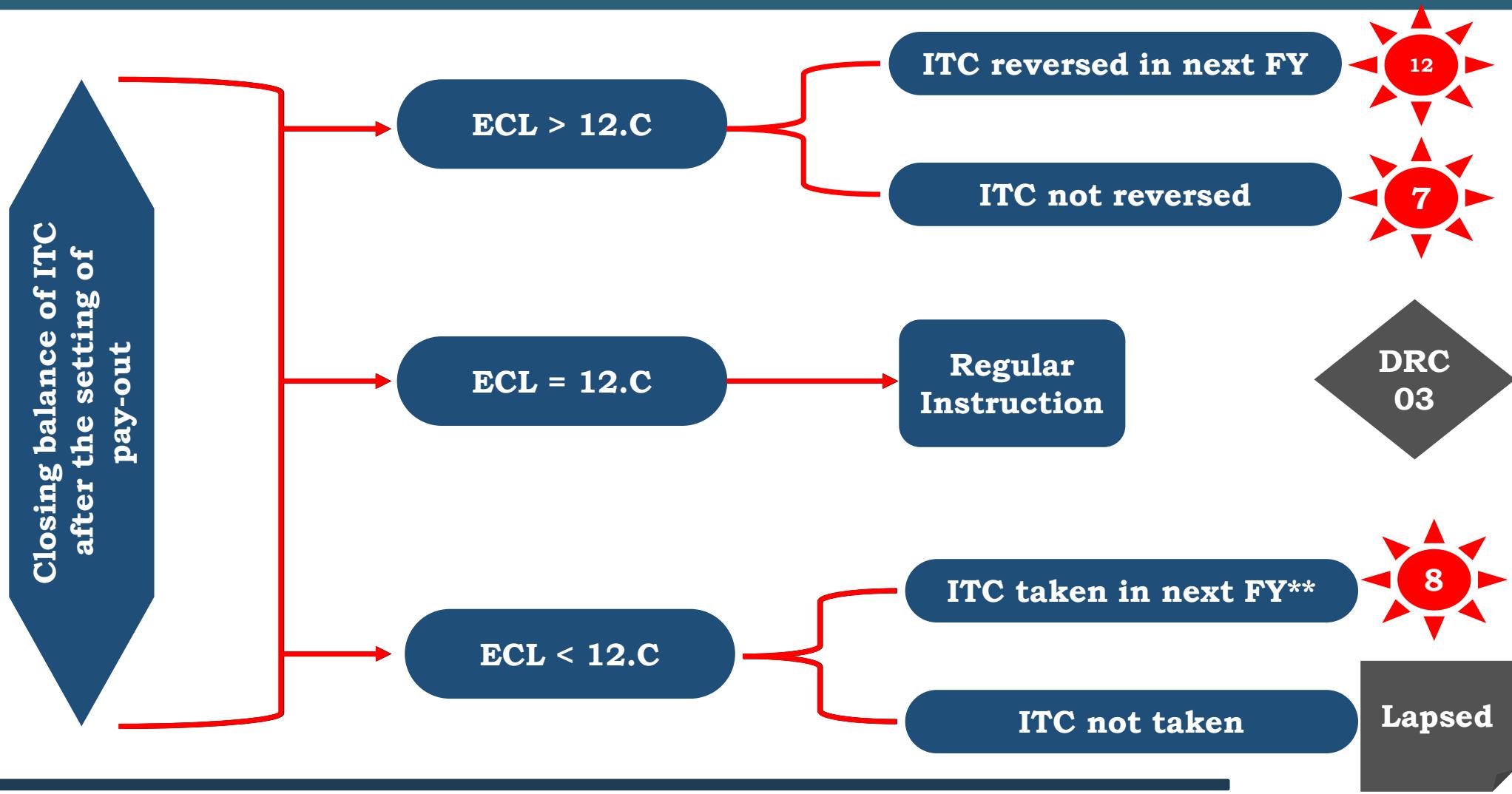
ITC A/c.			
Date	PARTICULARS	DEBIT	CREDIT
01.04.20XX	By Opening Balance	XXXX.XX	
XX.XX.20XX	By	XXXX.XX	
XX.XX.20XX	By	XXXX.XX	
XX.XX.20XX	By	XXXX.XX	
XX.XX.20XX	To		XXXX.XX
XX.XX.20XX	To GST Liability A/c.		XXXX.XX
XX.XX.20XX	To		XXXX.XX
XX.XX.20XX	To		XXXX.XX
XX.XX.20XX	By	XXXX.XX	
XX.XX.20XX	By	XXXX.XX	
XX.XX.20XX	By	XXXX.XX	
XX.XX.20XX	To		XXXX.XX
XX.XX.20XX	To GST Liability A/c.		XXXX.XX
XX.XX.20XX	To		XXXX.XX
XX.XX.20XX	To GST Liability A/c.		XXXX.XX
XX.XX.20XX	By	XXXX.XX	
XX.XX.20XX	By	XXXX.XX	
XX.XX.20XX	To		XXXX.XX
XX.XX.20XX	To GST Liability A/c.		XXXX.XX
XX.XX.20XX	To		XXXX.XX
XX.XX.20XX	To		XXXX.XX
31.03.20XX	To Closing Balance		XXXX.XX
	TOTAL	XXXX.XX	XXXX.XX

12.B

12.A = Net of ITC claimed
(Excl. Tax Payment)

12.C

RECONCILIATION OF ITC





Thank You

Name: CA. Shaikh Abdul Samad. A

Email: samad@ssaca.in

Mobile: 93623 03408