Form GST DRC-06

[See rule 142(4)]

Reply to the Show Cause Notice

ARN: ZD360424043193M **Date: 22/04/2024**

1. GSTIN	36AAHFB7046A1ZT	
2. Name	B & C ESTATES	
3. Details of Show Cause Notice	Reference No. ZD360124043259I	Date of issue 31/01/2024
4. Financial Year	2018-2019	
5. Reply		
Dear Sir, Please find the attached Reply to the show cause notice vid e Reference No. ZD360124043259I dated 31.01.2024 Kindly acknowledge t he same and do the needful.		
6. Documents uploaded		
SCN_Reply_Along_with_Covering_letter.pdf All_anexures_I_IV.pdf		
7. Option for personal hearing	☑ Yes	☐ No

8.Verification-

I hereby solemnly affirm and declare that the information given herein above is true and correct to the best of my/our knowledge and belief and nothing has been concealed therefrom.

Signature of Authorized Signatory
Name : SOHAMMODI
Designation / Status: Managing Partner
Date: 22/04/2024

H N A & Co LLP
Chartered Accountants
(Formerly known as Hiregange & Associates LLP)

Date:22.04.2024

To
The Assistant Commissioner Of State Tax,
Begumpet-2 Circle, 5th Floor,
Pavani prestige, Ameerpet,
Hyderabad.

Dear Sir,

Sub: Filing of Reply to Show Cause Notice in Form GST DRC – 06.

Ref: SCN vide Ref No. ZD360124043259I dated 31.01.2024 issued to **M/s. B & C Estates.**

1. We have been authorized by M/s. B & C Estates to submit the SCN reply to the above-referred SCN vide Ref No. ZD360124043259I dated 31.01.2024 and represent before your good office and to do necessary correspondence in the above-referred matter. A copy of the authorization is attached to the Reply.

2. In this regard, we are herewith submitting the SCN reply along with the authorization letter and other annexures referred to in the reply.

We shall be glad to provide any other information in this regard. Kindly acknowledge the receipt of the reply and post the hearing at the earliest.

Thanking You,
Yours faithfully,

For M/s. H N A & Co. LLP
(Formerly known as Hiregange & Associates LLP)
Chartered Accountants

LAKSHMAN KUMAR KADALI
Digitally signed by LAKSHMAN KUMAR KADALI
Date: 2024.04.22 15:41:49 +05'30'

HNA & CO LLP Hyderabad Chartered Accountants

CA Lakshman Kumar K
Partner

Index

FORM GST DRC – 06

[See rule 142(4)]

Reply to the Show Cause Notice

1.GSTIN	36AAHFB7046A1ZT	
2.Name	B & C Estates	
3.Details of Show Cause Notice	Ref. No. ZD360124043259I	Date of issue: 31.01.2024
4.Financial Year	2018-19	
5.Reply		
Given as Annexure A		
6.Documents uploaded		
7.Option for personal hearing	Yes- Required	No

8.Verification –

I hereby solemnly affirm and declare that the information given hereinabove is true and correct to the best of my knowledge and belief and nothing has been concealed therefrom.

B & C ESTATES SEC'BAD

Signature of Authorised Signatory

ANNEXURE A:

FACTS OF THE CASE:

A. M/s. B & C Estates (hereinafter referred as "Noticee") located at 5-4-187/3 and 4, 2nd Floor, Soham Mansion, MG Road, Secunderabad, Ranga Reddy, Telangana – 500003 is *inter alia* engaged in provision of taxable services viz. Works Contract services and are registered with Goods and Service Tax Department vide GSTIN 36AAHFB7046A1ZT.

B. Noticee is regularly discharging GST and filing periodical returns. Noticee has also filed the Annual Return for the period 2018-19 and also filed reconciliation statement in GSTR-9C for the period 2018-19.

C. Subsequently, Noticee is in receipt of the present Show Cause Notice issued by the Deputy Commissioner of State Tax, Begumpet STU-2, Begumpet Division vide reference No. ZD3601240432591 dated 31.01.2024 for the period 2018-19, proposing to demand an amount of Rs. 22,94,144/-. Copy of SCN is enclosed as **Annexure I.**

D. In response to the above notice, Noticee is herewith making the following submissions.

Submissions

1. Noticee submits that they deny all the allegations made in Show Cause Notice (SCN) as they are not factually/legally correct.

2. Noticee submits that the provisions (including Rules, Notifications & Circulars issued thereunder) of both the CGST Act, 2017 and the Telangana GST Act, 2017 are the same except for certain provisions. Therefore, unless a mention is specifically made to any dissimilar provisions, a reference to the CGST Act, 2017 would also mean a reference to the same provision under the TGST Act, 2017. Similarly, the provisions of CGST Act, 2017 are adopted by IGST Act, 2017 thereby the reference to CGST provisions be considered for IGST purpose also, wherever arises.

In Re: No excess ITC reversed in GSTR-09

3. Noticee submits that the impugned notice has stated that the under Table 10A of GSTR-9C for FY 2018-19 it is reported that the Noticee has reversed excess ITC in GSTR-09 when compared with ITC declared as reversed in GSTR-3B which has resulted in underpayment of tax.

B & C ESTATES SEC'BAD

4. In this regard, Noticee submits that while filing the GSTR-09 for the period 2018-19, Noticee has declared an amount of Rs.7,40,047/- as reversal of ITC availed during previous financial year in Table 7 of GSTR-09. The details of the same are explained as follows:

S.NO	Particulars	CGST	SGST	TOTAL
A.	Tax amount as per BOA Table 9P of GSTR-9C	1,23,14,196	1,23,14,196	2,46,28,392
B.	Reversals made during the year	7,40,047	7,40,047	14,80,094
C.	**Tax amount as per GSTR-09**	**1,30,54,224**	**1,30,54,224**	**2,61,08,486**

5. Noticee submits that the above referred reversal has been made by way of adding the same to the output tax while filing the GSTR-3B returns. This fact is also evident from the liability declared in GSTR-09 as per Table 4 and the taxes paid as per Table 10 of GSTR-09. Therefore, the reversals disclosed in GSTR-09 was already paid while filing the GSTR-3B returns and there is no short reversal. The above explanation is tabulated as below

S.NO	Particulars	CGST	SGST	TOTAL
A.	Tax amount as per GSTR-09	1,30,54,224	1,30,54,224	2,61,08,486
B.	Liability discharged through ITC & Cash (same is evident from GSTR-3B enclosed as **Annexure II**)	1,29,80,243	1,29,80,243	2,59,60,486
C.	**Net tax amount is to be paid(A-B)**	**74,001**	**74,001**	**1,48,002**

6. In this regard, it is mentioned that the above tax liability is discharged through DRC-03 vide ARN AD3612200021521 dated 16.12.2020 & AD361220001598E dated 11.12.2020 along with interest. Copy of DRC-03 is enclosed as **Annexure III.**

B & C ESTATES SEC'BAD

7. Hence, the impugned notice to that extent needs to be dropped (Copy of GSTR-09 & GSTR-09C is enclosed as **Annexure-IV)**.

8. Further, the fact that the differential amount pertains to reversal of ITC is also evident from Table 7 H1 of GSTR-09 for the period 2018-19. Also, Noticee submits that there is an excess payment of GST as per Table 9R of GSTR-09C and there is no short payment in GSTR-09. Even on that count as well, the demand proposed in SCN is not correct and the same needs to be dropped.

In Re: Penalties and interest are not payable/imposable:

9. Noticee submits that Noticee is of vehement belief that there is no additional payment of tax liability, therefore, the question of interest and penalty does not arise. Further, it is a natural corollary that when the principal is not payable there can be no question of paying any Penalty as held by the Supreme Court in Prathiba Processors Vs UOI, 1996 (88) ELT 12 (SC).

10. Further, Noticee submits that the impugned show cause notice had not discharged the burden of proof regarding the imposition of the penalty under CGST Act, 2017. In this regard, wishes to rely on the judgment in the case of Indian Coffee Workers' Co-Op. Society Ltd Vs C.C.E. & S.T., Allahabad 2014 (34) S.T.R 546 (All) it was held that *"It is unjustified in absence of discussion on fundamental conditions for the imposition of penalty under Section 78 of Finance Act, 1994".*

11. Noticee submits that Section73(11) of the CGST Act, 2017 which provides for penalty in case of non-payment of self-assessed tax reads as follows

    (11) Notwithstanding anything contained in sub-section (6) or sub-section (8), penalty under sub-section (9) shall be payable where any amount of self-assessed tax or any amount collected as tax has not been paid within a period of thirty days from the due date of payment of such tax

    From the above referred sub-section, it is clear that the penalty is applicable only when any amount of self-assessed tax or any amount collected as tax has not been paid within a period of 30 days from the due date of payment of such tax. However, in the instant case the Noticee has paid the self-assessed tax and there is no delay in payment of tax. Hence, the penalty under Section 73(11) is not applicable in the instant case.

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12. Noticee submits that the Supreme Court in case of CIT Vs Reliance Petro Products Pvt Ltd (SC) 2010 (11) SCC (762) while examining the imposition of penalties under Section 271(1)(c) of Income Tax Act, 1961 held that penlaties are not applicable in similar circumstances.

13. Noticee submits that it is pertinent to understand that the Supreme Court in the above referred case has held that the penalties shall not be imposed even though the mens rea is not applicable for imposition of penalties.

14. In addition to above, Noticee submits that where an authority is vested with discretionary powers, discretion has to be exercised by application of mind and by recording reasons to promote fairness, transparency and equity. In this regard the reliance is placed on the judgement of hon'ble Supreme Court in the case of Maya Devi v. Raj Kumari Batra dated 08.09.2010 [Civil Appeal No.10249 of 2003] wherein it was held that *"14. It is in the light of the above pronouncements unnecessary to say anything beyond what has been so eloquently said in support of the need to give reasons for orders made by Courts and statutory or other authorities exercising quasi-judicial functions. All that we may mention is that in a system governed by the rule of law, there is nothing like absolute or unbridled power exercisable at the whims and fancies of the repository of such power. There is nothing like a power without any limits or constraints. That is so even when a Court or other authority may be vested with wide discretionary power, for even discretion has to be exercised only along well recognized and sound juristic principles with a view to promoting fairness, inducing transparency and aiding equity."*

15. Noticee submits that the Supreme Court in case of **Hindustan Steel Ltd. v. State of Orissa —1978 [AIR 1970 SC 253]** while dealing with the similar facts wherein a mandatory penalty is prescribed without the concept of mens rea held that *""Under the Act penalty may be imposed for failure to register as a dealer: Section 9(1) read with Section 25(1)(a) of the Act. But the liability to pay penalty does not arise merely upon proof of default in registering as a dealer. An order imposing penalty for failure to carry out a statutory obligation is the result of a quasi-criminal proceeding, and penalty will not ordinarily be imposed unless the party obliged either acted deliberately in defiance of law or was guilty of conduct contumacious or dishonest, or acted in conscious disregard of its obligation. Penalty will not also be imposed merely because it is lawful to do so. Whether*

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penalty should be imposed for failure to perform a statutory obligation is a matter of discretion of the authority to be exercised judicially and on a consideration of all the relevant circumstances. ***Even if a minimum penalty is prescribed, the authority competent to impose the penalty will be justified in refusing to impose penalty, when there is a technical or venial breach of the provisions of the Act or where the breach flows from a bona fide belief that The offender is not liable to act in the manner prescribed by the statute. Those in charge of the affairs of the Company in failing to register the Company as a dealer acted in the honest and genuine belief that the Company was not a dealer. Granting that they erred, no case for imposing penalty was made out***

16. Noticee further submits that it was held in the case of Collector of Customs v. Unitech Exports Ltd. 1999 (108) E.L.T. 462 (Tribunal) that- "***It is settled position that penalty should not be imposed for the sake of levy. The penalty is not a source of Revenue.*** The penalty can be imposed depending upon the facts and circumstances of the case that there is a clear finding by the authorities below that this case does not warrant the imposition of penalty. ***The respondent's Counsel has also relied upon the decision of the Supreme Court in the case of M/s. Pratibha Processors v. Union of India reported in 1996 (88) E.L.T. 12 (S.C.) that penalty ordinarily levied for some contumacious conduct or a deliberate violation of the provisions of the particular statute.***" Hence, Penalty cannot be imposed in the absence of deliberate defiance of law even if the statute provides for a penalty.

17. Noticee submits that the Supreme Court in case of Price Waterhouse Coopers Pvt. Ltd Vs Commissioner of Income Tax, Kolkata S.L.P.(C) No.10700 of 2009 held as follows

    "20. We are of the opinion, given the peculiar facts of this case, that the imposition of penalty on the assessee is not justified. We are satisfied that the assessee had committed an inadvertent and bona fide error and had not intended to or attempted to either conceal its income or furnish inaccurate particulars."

18. Notice submits that from all the above submissions, it is clear that imposition of penalties is not warranted therefore the impugned notice needs to be dropped.

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In Re: Impugned notice is not valid

19. Noticee submits that the impugned notice has been issued proposing to demand an amount of Rs. 22,94,144/- towards liability discrepancies in GSTR-9C reported in Table 10A which shows that the issue is relating to discrepancy in returns filed by the Noticee.

20. In this regard, Noticee submits that Section 61 read with Rule 99 specifies that scrutiny of the returns shall be done based on the information available with the proper officer and in case of any discrepancy, he shall issue a notice to the said person in FORM GST ASMT-10, under Rule 99(1), informing him of such discrepancy and seeking his explanation thereto. In case if the explanation provided by the Noticee is satisfactory, then no further action shall be taken in that regard. If the explanation provided is not satisfactory, then the proper officer can initiate appropriate action under Section 73 or Section 74.

21. However, in the instant case Noticee has not received any notice in FORM ASMT-10 requiring the Noticee to provide explanation for the discrepancy noticed in the returns. Instead, the proper officer has directly issued Form GST DRC-01 under Section 73 which shows that the impugned notice has been issued without following the procedure prescribed in Section 61 of CGST Act, 2017 and Rule 99 of CGST Rules, 2017. In this regard, reliance is placed on M/s. Vadivel Pyrotech Pvt Ltd Vs Assistant Commissioner (ST), Circle-II, CTD, Sivakasi West 2022 (10) TMI 784 – Madras High Court wherein it was held that *"6. To a pointed question as to whether Form ASMT 10 which ought to have been issued in respect of aspects forming the subject matter of the proceedings in GST DRC-01 culminating in GST DRC-07 in view of the fact that the proceedings are pursuant to scrutiny of assessments, the learned Additional Government Pleader submitted that Form ASMT 10 was not issued other than the one issued on 22.12.2021, which does not cover the issues raised in the impugned proceeding. The learned Additional Government Pleader sought leave to issue notice in Form ASMT 10 in respect of the aspects forming the subject matter of the impugned proceedings and thereafter to assess in compliance with the procedure contemplated under the Act including Section 61.*

7. Recording the same, the impugned order dated 09.05.2022 is set aside and the matter is remitted back to the Assessing Officer for redoing the assessment. It is open to the Respondent to issue appropriate Form (Form ASMT 10) and after affording a reasonable opportunity to the petitioner in the manner contemplated

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under the Act proceed further in accordance with law. The petitioner shall also co-operate in the proceedings."

Notice issued on assumptions and presumptions

22. Noticee submits that impugned SCN was issued with prejudged and premeditated conclusions on various issues raised in the notice. That being a case, issuance of SCN in that fashion is bad in law and requires to be dropped. In this regard, reliance is placed on Oryx Fisheries Pvt. Ltd. v. Union of India — 2011 (266) E.L.T. 422 (S.C.)

23. Noticee submits that the subject SCN is issued based on mere assumption and unwarranted inference, interpretation of the law without considering the intention of the law, documents on record, the scope of activities undertaken, and the nature of activity involved, the incorrect basis of computation, creating its own assumptions, presumptions. Further, they have arrived at the conclusion without actual examination of facts, provisions of the Finance Act, 1994. In this regard, Noticee relies on the decision of the Hon'ble Supreme Court in case **Oudh Sugar Mills Limited v. UOI, 1978 (2) ELT 172 (SC)**

Impugned Notice is Time Barred u/s 73 of CGST Act,2017.

24. Further, it is informed that above-mentioned Show Cause Notice is issued beyond the time limit as per Section 73 of CGST Act,2017. It is submitted that the impugned SCN was issued under section 73 of CGST Act, 2017 which provides for adjudication of demand within 3 years from the due date of the annual return of the corresponding FY. For FY 2018-19, the annual return due date falls on 31.12.2020 and the 3-year time limit expires by 31.12.2023 however citing the difficulties caused due to Covid-19, the Government has extended the time limit from 31.12.2023 to 31.03.2024 by exercising the powers u/s. 168A, ibid by the Notification No. 09/2023 dated 31.03.2023 and further extended to 30.04.2024 vide Notification No. 56/2023-CT dated 28.12.2023 and corresponding GO Ms. No.170 dated 30.12.2023.

25. In this regard, it is submitted that an extension of the time period prescribed for issuance of show cause notice under Section 73 (10) of the Goods and Service Tax Act, 2017 is not sustainable in law, in as much as COVID restrictions were uplifted long back in the year 2022 and the revenue had sufficient time to complete the scrutiny and audit process. Further, the 'force majeure' is as defined u/s. 168A, ibid was never occurred from 2022 till the expiry of the

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extended due date of 31.03.2024. Hence, the extension of time runs beyond the mandate of Section 168A and is not sustained in the law.

26. Noticee craves leave to alter, add to and/or amend the above reply.

27. Noticee would also like to be heard in personal, before any Notice being passed in this regard.

For M/s. B & C Estates

B & C ESTATES SEC'BAD

Authorised Signatory

Hyderabad

BEFORE THE ASSISTANT COMMISSIONER OF STATE TAX, BEGUMPET-2 CIRCLE, 5th FLOOR, PAVANI PRESTIGE, AMEERPET, HYDERABAD.

Sub: Proceedings under Show Cause Notice vide Ref No. ZD360124043259I dated 31.01.2024 issued to M/s. B & C Estates

I, SOHAM MODI PARTNER of M/s. B & C Estates hereby authorizes and appoint H N A & Co LLP, Chartered Accountants, Bangalore or their partners and qualified staff who are authorized to act as an authorized representative under the relevant provisions of the law, to do all or any of the following acts: -

a. To act, appear and plead in the above-noted proceedings before the above authorities or any other authorities before whom the same may be posted or heard and to file and take back documents.
b. To sign, file verify and present pleadings, applications, appeals, cross-objections, revision, restoration, withdrawal and compromise applications, replies, objections and affidavits etc., as may be deemed necessary or proper in the above proceedings from time to time.
c. To Sub-delegate all or any of the aforesaid powers to any other representative and I/We do hereby agree to ratify and confirm acts done by our above-authorized representative or his substitute in the matter as my/our own acts as if done by me/us for all intents and purposes.

This authorization will remain in force till it is duly revoked by me/us. Executed this on 22nd April 2024 at Hyderabad

B & C ESTATES SEC'BAD

Signature

I the undersigned partner of M/s H N A & Co LLP, Chartered Accountants, do hereby declare that the said M/s H N A & Co LLP is a registered firm of Chartered Accountants, and all its partners are Chartered Accountants holding certificate of practice and duly qualified to represent in above proceedings under Section 116 of the SGST Act, 2017. I accept the above-said appointment on behalf of M/S H N A & Co LLP. The firm will represent through any one or more of its partners or Staff members who are qualified to represent before the above authorities.

Dated: 22.04.2024

Address for service:
H N A & Co LLP,
Chartered Accountants,
4th Floor, West Block, Anushka Pride,
Beside SBI Bank, Above Lawrence & Mayo
Road Number 12, Banjara Hills,
Hyderabad, Telangana 500034

For H N A & Co LLP
Chartered Accountants

H N A & CO LLP Hyderabad Chartered Accountants

Lakshman Kumar K
Partner (M.No. 241726)

I Partner/employee/associate of M/s H N A & Co LLP duly qualified to represent in above proceedings in terms of the relevant law, also accept the above said authorization and appointment.

S.No.	Name	Qualification	Membership No.	Signature
1	**Sudhir V S**	**CA**	**219109**	
2	**Venkat Prasad P**	**CA/LLB**		
3	**Sowmya U**	**CA**	**273758**	

Annexure-I

FORM GST DRC - 01
[See rule 100(2) & 142(1)(a)]

Reference No. - ZD360124043259I

Date - 31-01-2024

To

GSTIN/ID: 36AAHFB7046A1ZT
Name: B & C ESTATES
Address : 5-4-187/3 and 4, 2nd floor, soham mansion, mg road, secunderabad, Rangareddy, Telangana, 500003

Tax Period : APR 2018 - MAR 2019 **F.Y.- 2018-2019**

Act/ Rules Provisions - Section 73 under gst act 2017

Section / sub-section under which SCN is being issued - 73

Summary of Show Cause Notice

(a) Brief Fact of the Case : Liability against discrepancies in GSTR - 9C

(b) Grounds : Section 73 under gst act 2017

(c) Tax and other dues :

(Amount in Rs.)

Sr. No.	Tax Rate (%)	Turnover	Tax Period		Act	POS (Place of Supply)	Tax	Interest	Penalty	Fee	Others	Total
			From	To								
1	2	3	4	5	6	7	8	9	10	11	12	13
1	0	0.00	APR 2018	MAR 2019	CGST	NA	7,40,047.00	3,33,021.00	74,004.00	0.00	0.00	11,47,072.00
2	0	0.00	APR	MAR	SGST	NA	7,40,047.00	3,33,021.00	74,004.00	0.00	0.00	11,47,072.00

			2018	2019								
Total							14,80,094.00	6,66,042.00	1,48,008.00	0.00	0.00	22,94,144.00

Show Cause Notice is attached.

Supporting documents attached by officer:

B & C Estates.pdf : DRC

Details of personal hearing and due date to file reply:

Sr. No.	Description	Particulars
1	Date by which reply has to be submitted	29-02-2024
2	Date of personal hearing	NA
3	Time of personal hearing	NA
4	Venue where personal hearing will be held	NA

Signature
Name: Sivarami Reddy Parvatham
Designation: Assistant Commissioner
Jurisdiction: BEGUMPET 2:Begumpet:Telangana

Government of Telangana
Commercial Taxes Department

Office of the
Assisstant Commissioner (ST)
Begumpet – 2 Circle
5^{th} Floor, Pavani Prestige
Ameerpet, Hyderabad
Dt: 30.01.2024

ANNUXURE TO GST DRC-01

Sub:	GST Act 2017- B & C ESTATES - Examination of returns filed –Certain discrepancies on Turnover/Taxes –Issue of Show cause notice - Objections called for.
Ref	Monthly return data available with this office

*****

B & C ESTATES is a registered tax payer with GSTIN: 36AAHFB7046A1ZT. Due to the re-organization of the Commercial Taxes Department in the month of August. 2023, the case is transferred to the AC(ST), Begumpet- 2 Circle, Begumpet division.

This is to inform that on scrutiny/ verification of varies returns GSTR-1 , GSTR3B, GSTR-9 and GSR-9C filed by you, for the year 2018-19 certain discrepancy/discrepancies as detailed below have been observed.

At Table9 of the 9C filed by them, the assessee has declared an un-reconciled turnover/tax of Rs. 1480095

The Reasons given by them in the Table10 are following :

1) Liability is relating to reversal of ITC and the accounting entries were not passed

The Justification given by them for the unreconciled turnover /tax not valid for the following reasons :

Please produce proper evidence (This is the reason entered by the processing authority in the computation Statement from GSTR-9C.

The tax payer not furnished any valid reasons / reply not correct (This is the reason entered by the processing authority in the computation Statement from GSTR-9C).

SL No	Act	Tax	Interest	Penalty	Total
1	SGST	740047	333021	74004	1147072
2	CGST	740047	333021	74004	1147072
3	IGST	0	0	0	0
4	CESS	0	0	0	0

Therefore, it is proposed to assess B & C ESTATES, GSTIN 36AAHFB7046A1ZT for the net tax, interest and penalty payable as above under Section 73 of the SGST/CGST Act. Further, Section 20 of the IGST Act prescribes that, subject to the provisions of this Act and the rules made there under, the provisions of the Central Goods and Services Tax Act relating to supply, payment of tax, inspection and demand and levy, collection of tax, penalty, interest etc. are shall, mutatis mutandis, apply, so far as may be, in relation to integrated tax as they apply in relation to central tax as if they are enacted under this Act.

The registered tax payer may therefore pay the tax along interest in DRC-03. However, if the registered tax payer is not agreeing with proposals in this notice they may file their objection in the DRC-06 within (30) days from the date of receipt of this notice, failing which orders as deemed fit will be passed without any further correspondence in the matter.

The tax payer is requested to avail personal hearing in this regard during office hours within the aforesaid time of (30) days from the date of receipt of this notice in the chambers of the undersigned.

They are informed that no penalty is liveable on the tax paid within (30) days from the date of receipt of this show cause notice and any payment made after (30) days of receipt of notice would attract a penalty at a rate of 10% of the tax determined or Rs.10,000 penalty whichever is higher under Section 122 of the CGST/SGST Act.

The reply with documentary evidence by the tax payer will be considered based on the merits of the case.

Sd/-
Assistant Commissioner (ST)
Begumpet – 2 Circle, Hyd

To
B & C ESTATES
GSTIN 36AAHFB7046A1ZT

Form GSTR-3B

[See Rule 61]

System Generated Summary

(For Reference only)

Financial Year	2018-19

1. GSTIN	36AAHFB7046A1ZT
2(a). Legal Name of the Registered Person	B & C ESTATES
2(b). Trade name, if any	B&C ESTATES5

3.1 Details of Outward supplies and inward supplies liable to reverse charge

Nature of Supplies	Total Taxable value(₹)	Integrated Tax(₹)	Central Tax(₹)	State/UT Tax(₹)	Cess(₹)
(a) Outward Taxable Supplies (Other Than Zero Rated, Nil Rated and Exempted)	22,45,79,960.76	0.00	1,29,80,242.62	1,29,80,242.62	0.00
(b) Outward Taxable Supplies (Zero Rated)	0.00	0.00	0.00	0.00	0.00
(c) Other Outward Supplies (Nil Rated, Exempted)	10,24,37,811.00	0.00	0.00	0.00	0.00
(d) Inward Supplies (Liable to Reverse Charge)	0.00	0.00	0.00	0.00	0.00
(e) Non-GST Outward Supplies	0.00	0.00	0.00	0.00	0.00

3.2 Out of Supplies made in 3.1 (a) above, Details of Inter-State Supplies made to Unregistered Persons, Composition Taxable Persons and UIN Holders

Nature of Supplies	Total Taxable value(₹)	Integrated Tax(₹)
Supplies Made to Unregistered Persons	0.00	0.00
Supplies Made to Composition Taxable Persons	0.00	0.00
Supplies Made to UIN holders	0.00	0.00

4. Eligible ITC

Details	Integrated Tax(₹)	Central Tax(₹)	State/UT Tax(₹)	Cess(₹)
(A) ITC Available(Whether in Full or Part)	**7,59,389.00**	**90,59,175.28**	**90,59,175.28**	**0.00**
(1) Import of goods	0.00	0.00	0.00	0.00
(2) Import of services	0.00	0.00	0.00	0.00
(3) Inward supplies liable to reverse charge (other than 1 & 2 above)	0.00	0.00	0.00	0.00
(4) Inward supplies from ISD	0.00	0.00	0.00	0.00
(5) All other ITC	7,59,389.00	90,59,175.28	90,59,175.28	0.00
(B) ITC Reversed	**0.00**	**0.00**	**0.00**	**0.00**
(1) As per rules 42 & 43 of CGST Rules	0.00	0.00	0.00	0.00
(2) Others	0.00	0.00	0.00	0.00
(C) Net ITC Available (A–B)	**7,59,389.00**	**90,59,175.28**	**90,59,175.28**	**0.00**
(D) Ineligible ITC	**0.00**	**0.00**	**0.00**	**0.00**
(1) As per section 17(5)	0.00	0.00	0.00	0.00
(2) Others	0.00	0.00	0.00	0.00

5 Values of Exempt, Nil-Rated and Non-GST Inward Supplies

Nature of Supplies	Inter-State Supplies(₹)	Intra-State Supplies(₹)
From a Supplier under Composition Scheme, Exempt and Nil Rated Supply	24,27,293.80	0.00
Non GST Supply	0.00	0.00

5.1 Interest and Late fee

Details	Integrated Tax(₹)	Central Tax(₹)	State/UT Tax(₹)	Cess(₹)
Interest	0.00	0.00	0.00	0.00
Late fee	0.00	200.00	200.00	0.00

6.1 Payment of Tax

Description	Total Tax Payable(₹)	Tax Paid Through ITC(₹)				Tax/Cess Paid in Cash(₹)	Interest Paid in Cash(₹)	Late Fee Paid in Cash(₹)
		Integrated Tax	Central Tax	State/UT Tax	Cess			
(A) Other than Reverse Charge								
Integrated Tax	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Central Tax	1,29,80,243.00	14,44,640.00	70,22,738.00	0.00	0.00	45,12,865.00	0.00	200.00
State/UT Tax	1,29,80,243.00	94,150.00	0.00	70,22,738.00	0.00	58,63,355.00	0.00	200.00
Cess	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
(B) Reverse Charge								
Integrated Tax	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Central Tax	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
State/UT Tax	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cess	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Annexure-III

FORM GST DRC - 03

[See rule 142(2)&142(3)]

Intimation of payment made voluntarily or made against the show cause notice (SCN) or statement

ARN : **Date :16/12/2020**

1.	GSTIN	36AAHFB7046A1ZT	
2.	Name	B & C ESTATES	
3.	Cause of Payment	Annual return	
4.	Section under which voluntary payment is made	73(5)	
5.	Details of show cause notice, if payment is made within 30 days of its issue	Reference No:NA	Date of issue:NA
6.	Financial Year	2018-2019	
7.	Details of payment made including interest and penalty, if applicable (Amount in Rs.)		

Sr. No.	Tax Period	Act	Place of supply	Tax/Cess	Interest	Penalty,if applicable	Others	Total	Ledger utilised (Cash/credit)	Debit entry no.	Date of debit entry
1.	APR 2018-MAR 2019	CGST	Telangana	61,756.00	0.00	0.00	0.00	61,756.00	Cash	DC3612200074738	16/12/2020
2.	APR 2018-MAR 2019	SGST	Telangana	61,756.00	0.00	0.00	0.00	61,756.00	Cash	DC3612200074738	16/12/2020

8. Reasons, if any -

Excess ITC payment FY 2018-19

9. Verification -

I hereby solemnly affirm and declare that the information given hereinabove is true and correct to the best of my knowledge and belief and nothing has been concealed therefrom .

Signature of Authorized Signatory
Name: SOHAM MODI
Designation: Managing Partner
Date: 16/12/2020

FORM GST DRC - 03

[See rule 142(2)&142(3)]

Intimation of payment made voluntarily or made against the show cause notice (SCN) or statement

ARN : **Date :11/12/2020**

1.	GSTIN	36AAHFB7046A1ZT	
2.	Name	B & C ESTATES	
3.	Cause of Payment	Annual return	
4.	Section under which voluntary payment is made	73(5)	
5.	Details of show cause notice, if payment is made within 30 days of its issue	Reference No:NA	Date of issue:NA
6.	Financial Year	2018-2019	
7.	Details of payment made including interest and penalty, if applicable (Amount in Rs.)		

Sr. No.	Tax Period	Act	Place of supply	Tax/Cess	Interest	Penalty,if applicable	Others	Total	Ledger utilised (Cash/credit)	Debit entry no.	Date of debit entry
1.	APR 2018-MAR 2019	CGST	Telangana	12,246.00	3,714.00	0.00	0.00	15,960.00	Cash	DC3612200049326	11/12/2020
2.	APR 2018-MAR 2019	SGST	Telangana	12,246.00	3,714.00	0.00	0.00	15,960.00	Cash	DC3612200049326	11/12/2020

8. Reasons, if any -

AnnualReturns 2018-19

RCM On security services

Interest on RCM

9. Verification -

I hereby solemnly affirm and declare that the information given hereinabove is true and correct to the best of my knowledge and belief and nothing has been concealed therefrom .

Signature of Authorized Signatory
Name: SOHAM MODI
Designation: Managing Partner
Date: 11/12/2020

Form GSTR-9

[See rule 80]

Annual Return

1. Financial Year	2018-19
2. GSTIN	36AAHFB7046A1ZT
3(a). Legal name of the registered person	B & C ESTATES
3(b). Trade name, if any	B&C ESTATES5
3(c). ARN	AA3603197148390
3(d). Date of Filing	25-11-2020

Pt. II	Details of Outward and inward supplies made during the financial year					
Sr.No	Nature of Supplies	Taxable Value(₹)	(Amount in ₹ in all tables)			
			Central Tax(₹)	State Tax / UT Tax(₹)	Integrated Tax(₹)	Cess(₹)
	1	2	3	4	5	6
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)	26,09,76,632.33	1,56,83,296.61	1,56,83,296.61	1,15,680.00	0.00
B	Supplies made to registered persons (B2B)	19,41,000.00	75,699.00	75,699.00	0.00	0.00
C	Zero rated supply (Export) on payment of tax (Except supplies to SEZs)	0.00			0.00	0.00
D	Supplies to SEZs on payment of tax	0.00			0.00	0.00
E	Deemed Exports	0.00	0.00	0.00	0.00	0.00
F	Advances on which tax has been paid but invoice has not been issued (not covered under (A) to (E) above)	0.00	0.00	0.00	0.00	0.00
G	Inward supplies on which tax is to be paid on the reverse	1,36,065.00	12,245.85	12,245.85	0.00	0.00

	charge basis					
H	Sub-total (A to G above)	26,30,53,697.33	1,57,71,241.46	1,57,71,241.46	1,15,680.00	0.00
I	Credit notes issued in respect of transactions specified in (B) to (E) above (-)	5,36,69,106.65	34,57,044.60	34,57,044.60	1,15,680.00	0.00
J	Debit notes issued in respect of transactions specified in (B) to (E) above (+)	0.00	0.00	0.00	0.00	0.00
K	Supplies / tax declared through Amendments (+)	0.00	0.00	0.00	0.00	0.00
L	Supplies / tax reduced through Amendments (-)	0.00	0.00	0.00	0.00	0.00
M	Sub total (I to L above)	-5,36,69,106.65	-34,57,044.60	-34,57,044.60	-1,15,680.00	0.00
N	Supplies and advances on which tax is to be paid (H + M) above	20,93,84,590.68	1,23,14,196.86	1,23,14,196.86	0.00	0.00

Pt. II	**Details of Outward and inward supplies made during the financial year**					
Sr.No	**Nature of Supplies**	**Taxable Value(₹)**	**(Amount in ₹ in all tables)**			
			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	0.00				
B	Supply to SEZs without payment of tax	0.00				
C	Supplies on which tax is to be paid by the recipient on reverse charge	0.00				
D	Exempted	18,35,428.46				
E	Nil Rated	0.00				
F	Non-GST supply (includes ‘no supply’)	11,55,23,520.31				
G	Sub total (A to F above)	11,73,58,948.77				
H	Credit Notes issued in respect of transactions	0.00				

	specified in A to F above (-)					
I	Debit Notes issued in respect of transactions specified in A to F above (+)	0.00				
J	Supplies declared through Amendments (+)	0.00				
K	Supplies reduced through Amendments (-)	0.00				
L	Sub-Total (H to K above)	0.00				
M	Turnover on which tax is not to be paid (G + L above)	11,73,58,948.77				
N	Total Turnover (including advances) (4N + 5M - 4G above)	32,66,07,474.45	1,23,01,951.01	1,23,01,951.01	0.00	0.00

Pt. III	Details of ITC for the financial year					
Sr.No	**Description**	**Type**	**Central Tax(₹)**	**State Tax / UT Tax(₹)**	**Integrated Tax(₹)**	**Cess(₹)**
	1	**2**	**3**	**4**	**5**	**6**
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)		90,59,175.28	90,59,175.28	7,59,389.00	0.00
B	Inward supplies (other than imports and inward supplies liable to reverse charge but includes services received from SEZs)	Inputs	90,59,175.28	90,59,175.28	7,59,389.00	0
		Capital Goods	0	0	0	0
		Input Services	0	0	0	0
C	Inward supplies received from unregistered persons liable to reverse charge (other than B above) on which tax is paid & ITC availed	Inputs	0	0	0	0
		Capital Goods	0	0	0	0
		Input Services	0	0	0	0

D	Inward supplies received from registered persons liable to reverse charge (other than B above) on which tax is paid and ITC availed	Inputs	0	0	0	0
		Capital Goods	0	0	0	0
		Input Services	0	0	0	0
E	Import of goods (including supplies from SEZs)	Inputs			0	0
		Capital Goods			0	0
F	Import of services (excluding inward supplies from SEZs)				0.00	0.00
G	Input Tax credit received from ISD		0.00	0.00	0.00	0.00
H	Amount of ITC reclaimed (other than B above) under the provisions of the Act		0.00	0.00	0.00	0.00
I	Sub-total (B to H above)		90,59,175.28	90,59,175.28	7,59,389.00	0.00
J	Difference (I - A above)		0.00	0.00	0.00	0.00
K	Transition Credit through TRAN-1 (including revisions if any)		0.00	0.00		
L	Transition Credit through TRAN-2		0.00	0.00		
M	Any other ITC availed but not specified above		0.00	0.00	0.00	0.00
N	Sub-total (K to M above)		0.00	0.00	0.00	0.00
O	Total ITC availed (I + N above)		90,59,175.28	90,59,175.28	7,59,389.00	0.00

Pt. III	Details of ITC for the financial year				
Sr.No	Description	Central Tax(₹)	State Tax / UT Tax(₹)	Integrated Tax(₹)	Cess(₹)
	1	2	3	4	5
7	Details of ITC Reversed and Ineligible ITC for the financial year				
A	As per Rule 37	0.00	0.00	0.00	0.00
B	As per Rule 39	0.00	0.00	0.00	0.00
C	As per Rule 42	0.00	0.00	0.00	0.00

D	As per Rule 43	0.00	0.00	0.00	0.00
E	As per section 17(5)	0.00	0.00	0.00	0.00
F	Reversal of TRAN-1 credit	0.00	0.00		
G	Reversal of TRAN-2 credit	0.00	0.00		
H1	Others	7,40,047.49	7,40,047.49	0.00	0.00
I	Total ITC Reversed (Sum of A to H above)	7,40,047.49	7,40,047.49	0.00	0.00
J	Net ITC Available for Utilization (6O - 7I)	83,19,127.79	83,19,127.79	7,59,389.00	0.00

Pt. III	Details of ITC for the financial year				
Sr.No	Details	Central Tax(₹)	State Tax / UT Tax(₹)	Integrated Tax(₹)	Cess(₹)
	1	2	3	4	5
8	Other ITC related information				
A	ITC as per GSTR-2A (Table 3 & 5 thereof)	73,38,184.95	73,38,184.75	9,52,444.85	0.00
B	ITC as per sum total of 6(B) and 6(H) above	90,59,175.28	90,59,175.28	7,59,389.00	0.00
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 upto specified period	0.00	0.00	0.00	0.00
D	Difference [A-(B+C)]	-17,20,990.33	-17,20,990.53	1,93,055.85	0.00
E	ITC available but not availed	0.00	0.00	0.00	0.00
F	ITC available but ineligible	0.00	0.00	0.00	0.00
G	IGST paid on import of goods (including supplies from SEZ)	0.00	0.00	0.00	0.00
H	IGST credit availed on import of goods (as per 6(E) above)	0.00	0.00	0.00	0.00
I	Difference (G-H)	0.00	0.00	0.00	0.00
J	ITC available but not availed on import of goods (Equal to I)	0.00	0.00	0.00	0.00
K	Total ITC to be lapsed in current financial year (E + F + J)	0.00	0.00	0.00	0.00

Pt. IV	Details of tax paid as declared in returns filed during the financial year						
9	Description	Tax Payable (₹)	Paid Through Cash (₹)	Paid Through ITC (₹)			
				Central Tax	State Tax / UT Tax	Integrated Tax	Cess
	1	2	3	4	5	6	7
A	Integrated Tax	0.00	0.00	0.00	0.00	0.00	
B	Central Tax	1,30,54,244.35	45,12,865.00	70,22,738.00		14,44,640.00	
C	State/UT Tax	1,30,54,244.35	58,63,355.00		70,22,738.00	94,150.00	
D	Cess	0.00	0.00				0.00
E	Interest	7,367.21	0.00				
F	Late Fees	400.00	400.00				
G	Penalty	0.00	0.00				
H	Other	0.00	0.00				

Pt. V	Particulars of the transactions for the financial year declared in returns of the next financial year till the specified period					
Sr.No.	Description	Taxable Value(₹)	Central Tax(₹)	State Tax / UT Tax(₹)	Integrated Tax(₹)	Cess(₹)
	1	2	3	4	5	6
10	Supplies / tax declared through Amendments (+) (net of debit notes)	0.00	0.00	0.00	0.00	0.00
11	Supplies / tax reduced through Amendments (-) (net of credit notes)	0.00	0.00	0.00	0.00	0.00
12	Reversal of ITC availed during previous financial year		0.00	0.00	0.00	0.00
13	ITC availed for the previous financial year		0.00	0.00	0.00	0.00
	Total turnover(5N + 10 - 11)	32,66,07,474.45	1,23,01,951.01	1,23,01,951.01	0.00	0.00

Pt. V	Particulars of the transactions for the financial year declared in returns of the next financial year till the specified period

14	Differential tax paid on account of declaration in 10 & 11 above		
Sr.No.	Description	Payable (₹)	Paid (₹)
	1	2	3
A	Integrated Tax	0.00	0.00
B	Central Tax	0.00	0.00
C	State/UT Tax	0.00	0.00
D	Cess	0.00	0.00
E	Interest	0.00	0.00

Pt. VI	Other Information							
15	Particulars of Demands and Refunds							
Sr.No.	Details	Central Tax (₹)	State Tax / UT Tax (₹)	Integrated Tax(₹)	Cess(₹)	Interest(₹)	Penalty (₹)	Late Fee / Others(₹)
	1	2	3	4	5	6	7	8
A	Total Refund claimed	0.00	0.00	0.00	0.00			
B	Total Refund sanctioned	0.00	0.00	0.00	0.00			
C	Total Refund Rejected	0.00	0.00	0.00	0.00			
D	Total Refund Pending	0.00	0.00	0.00	0.00			
E	Total demand of taxes	0.00	0.00	0.00	0.00	0.00	0.00	0.00
F	Total taxes paid in respect of E above	0.00	0.00	0.00	0.00	0.00	0.00	0.00
G	Total demands pending out of E above	0.00	0.00	0.00	0.00	0.00	0.00	0.00

16	Information on supplies received from composition taxpayers, deemed supply under section 143 and goods sent on approval basis					
Sr.No.	Details	Taxable Value (₹)	Central Tax (₹)	State Tax / UT Tax (₹)	Integrated Tax(₹)	Cess(₹)

	1	2	3	4	5	6
A	Supplies received from Composition taxpayers	0.00				
B	Deemed supply under section 143	0.00	0.00	0.00	0.00	0.00
C	Goods sent on approval basis but not returned	0.00	0.00	0.00	0.00	0.00

17. HSN Wise Summary of outward supplies.

18. HSN Wise Summary of inward supplies.

To view the details uploaded for Table 17 & 18, download GSTR 9 in Excel/Json format.

19	Late fee payable and paid		
Sr.No.	**Description**	**Payable(₹)**	**Paid(₹)**
	1	**2**	**3**
A	Central tax	0.00	0.00
B	State Tax	0.00	0.00

Verification:

I hereby solemnly affirm and declare that the information given herein above is true and correct to the best of my knowledge and belief and nothing has been concealed there from and in case of any reduction in output tax liability the benefit thereof has been/will be passed on to the recipient of supply.

Date: 25-11-2020

Name of Authorized Signatory

SOHAM MODI

Designation / Status

Managing Partner

Form GSTR-9C

See rule 80(3)

Reconciliation Statement

PART – A

Pt.I	Basic Details	
1	Financial Year	2018-19
2	GSTIN	36AAHFB7046A1ZT
3(a)	Legal Name	B & C ESTATES
3(b)	Trade Name (if any)	B&C ESTATES5
3(c)	ARN	AA3603197148702
3(d)	ARN Date	25-11-2020
4	Name of Act. If you are liable to audit under any Act	Income Tax Act, 1967
4A	Is the person making reconcilation statement (FORM GSTR-9C) is same person who had conducted the audit of mentioned GSTIN	No

(Amount in ₹ in all tables)

Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR-9)

Pt.II	Reconciliation of turnover declared in audited Annual Financial Statement with turnover declared in Annual Return (GSTR-9)		
5	Reconciliation of Gross Turnover		
Sr. No	Description		Amount
A	Turnover (including exports) as per audited financialstatements for the State / UT (For multi-GSTIN units under same PAN, the turnover shall be derived from the audited Annual Financial Statement)		32,44,90,094.31
B	Unbilled revenue at the beginning of Financial Year	(+)	0.00
C	Unadjusted advances at the end of the Financial Year	(+)	0.00
D	Deemed Supply under Schedule I	(+)	0.00

E	Credit Notes issued after the end of the financial year but reflected in the annual return	(+)	0.00
F	Trade Discounts accounted for in the audited Annual Financial Statement but are not permissible under GST	(+)	90,10,153.00
G	Turnover from April 2017 to June 2017	(-)	0.00
H	Unbilled revenue at the end of Financial Year	(-)	0.00
I	Unadjusted Advances at the beginning of the Financial Year	(-)	0.00
J	Credit notes accounted for in the audited Annual Financial Statement but are not permissible under GST	(-)	0.00
K	Adjustments on account of supply of goods by SEZ units to DTA Units	(-)	0.00
L	Turnover for the period under composition scheme	(-)	0.00
M	Adjustments in turnover under section 15 and rules thereunder	(+/-)	0.00
N	Adjustments in turnover due to foreign exchange fluctuations	(+/-)	0.00
O	Adjustments in turnover due to reasons not listed above	(+/-)	-68,92,772.86
P	Annual turnover after adjustments as above (A+B+C+D-E+F-G-H-I+J-K-L+M+N+O)		32,66,07,474.45
Q	Turnover as declared in Annual Return (GSTR9)		32,66,07,474.45
R	Un-Reconciled turnover (Q - P)		0.00

6	**Reasons for Un - Reconciled difference in Annual Gross Turnover**	
A	Reason number 1	

7	**Reconciliation of Taxable Turnover**	
Sr. No	**Description**	**Amount**
A	Annual turnover after adjustments (from 5P above)	32,66,07,474.45
B	Value of Exempted, Nil Rated, Non-GST supplies, No-Supply turnover	11,73,58,948.77

C	Zero rated supplies without payment of tax	0.00
D	Supplies on which tax is to be paid by the recipient on reverse charge basis	0.00
E	Taxable turnover as per adjustments above (A-B-C-D)	20,92,48,525.68
F	Taxable turnover as per liability declared in Annual Return (GSTR9)	20,92,48,525.68
G	Unreconciled taxable turnover (F-E)	0.00

8	Reasons for Un - Reconciled difference in taxable turnover	
A	Reason number 1	

Pt.III	Reconciliation of tax paid					
9	Reconciliation of rate wise liability and amount payable thereon					
Sr. No	Description	Taxable Value	Tax payable			
			Central tax	State tax/ UT tax	Integrated Tax	Cess, if applicable
A	5%	0.00	0.00	0.00	0.00	0.00
B	5% (RC)	0.00	0.00	0.00	0.00	0.00
B1	6%					
C	12%	0.00	0.00	0.00	0.00	0.00
D	12% (RC)	0.00	0.00	0.00	0.00	0.00
E	18%	20,92,48,525.68	1,23,01,951.01	1,23,01,951.01	0.00	0.00
F	18% (RC)	1,36,065.00	12,245.85	12,245.85	0.00	0.00
G	28%	0.00	0.00	0.00	0.00	0.00
H	28% (RC)	0.00	0.00	0.00	0.00	0.00
I	3%	0.00	0.00	0.00	0.00	0.00
J	0.25%	0.00	0.00	0.00	0.00	0.00
K	0.10%	0.00	0.00	0.00	0.00	0.00

L	Interest		0.00	0.00	0.00	0.00
M	Late Fee		0.00	0.00	0.00	0.00
N	Penalty		0.00	0.00	0.00	0.00
O	Others		0.00	0.00	0.00	0.00
P	Total amount to be paid as per tables above		1,23,14,196.86	1,23,14,196.86	0.00	0.00
Q	Total amount paid as declared in Annual Return (GSTR 9)		1,30,54,244.35	1,30,54,244.35	0.00	0.00
R	Un-reconciled payment of amount		7,40,047.49	7,40,047.49	0.00	0.00

10	Reasons for un-reconciled payment of amount	
A	Reason number 1	Liability is relating to reversal of ITC and the accounting entries were not passed

11	Additional amount payable but not paid (due to reasons specified under Tables 6,8 and 10 above)					
Sr. No	Description	Taxable Value	To be paid through Cash			
			Central tax	State tax/ UT tax	Integrated Tax	Cess, if applicable
A	5%	0.00	0.00	0.00	0.00	0.00
A1	6%					
B	12%	0.00	0.00	0.00	0.00	0.00
C	18%	0.00	0.00	0.00	0.00	0.00
D	28%	0.00	0.00	0.00	0.00	0.00
E	3%	0.00	0.00	0.00	0.00	0.00
F	0.25%	0.00	0.00	0.00	0.00	0.00
G	0.10%	0.00	0.00	0.00	0.00	0.00
H	Interest		0.00	0.00	0.00	0.00
I	Late Fee		0.00	0.00	0.00	0.00

J	Penalty		0.00	0.00	0.00	0.00
K	Others (please specify)		0.00	0.00	0.00	0.00

Pt. IV	Reconciliation of Input Tax Credit (ITC)	
12	Reconciliation of Net Input Tax Credit (ITC)	
Sr. No	Description	Amount
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)	1,71,90,368.71
B	ITC booked in earlier Financial Years claimed in current Financial Year	2,07,275.87
C	ITC booked in current Financial Year to be claimed in subsequent Financial Years	0.00
D	ITC availed as per audited financial statements or books of account	1,73,97,644.58
E	ITC claimed in Annual Return (GSTR9)	1,73,97,644.58
F	Un-reconciled ITC	0.00

13	Reasons for un-reconciled difference in ITC	
A	Reason number 1	

14	Reconciliation of ITC declared in Annual Return (GSTR9) with ITC availed on expenses as per audited Annual Financial Statement or books of account			
Sr.No	Description	Value	Amount of Total ITC	Amount of eligible ITC availed
A	Purchases	0.00	1,73,97,644.58	1,73,97,644.58
B	Freight / Carriage	0.00	0.00	0.00

C	Power and Fuel	0.00	0.00	0.00
D	Imported goods (Including received from SEZs)	0.00	0.00	0.00
E	Rent and Insurance	0.00	0.00	0.00
F	Goods lost, stolen, destroyed, written off or disposed of by way of gift or free samples	0.00	0.00	0.00
G	Royalties	0.00	0.00	0.00
H	Employees' Cost (Salaries, wages, Bonus etc.)	0.00	0.00	0.00
I	Conveyance charges	0.00	0.00	0.00
J	Bank Charges	0.00	0.00	0.00
K	Entertainment charges	0.00	0.00	0.00
L	Stationery Expenses(including postage etc.)	0.00	0.00	0.00
M	Repair and Maintenance	0.00	0.00	0.00
N	Other Miscellaneous expenses	0.00	0.00	0.00
O	Capital goods	0.00	0.00	0.00
P	Any Other expense 1	0.00	0.00	0.00
Q	Any Other expense 2	0.00	0.00	0.00
Q1	Any Other expense 3	0.00	0.00	0.00
Q2	Any Other expense 4	0.00	0.00	0.00
Q3	Any Other expense 5	0.00	0.00	0.00
Q4	Any other expense 6			
Q5	Any other expense 7			
Q6	Any other expense 8			
Q7	Any other expense 9			
Q8	Any other expense 10			

R	Total amount of eligible ITC availed (A to Qn)			1,73,97,644.58
S	ITC claimed in Annual Return (GSTR9)			1,73,97,644.58
T	Un-reconciled ITC (S-R)			0.00

15	Reasons for un - reconciled difference in ITC	
A	Reason number 1	

16	Tax payable on un-reconciled difference in ITC (due to reasons specified in 13 and 15 above)	
Sr. No	Description	Amount Payable
A	Central Tax	0.00
B	State/UT Tax	0.00
C	Integrated Tax	0.00
D	Cess	0.00
E	Interest	0.00
F	Penalty	0.00

Pt. V	Auditor's recommendation on additional Liability due to non-reconciliation					
Sr. No.	Description	Value	To be paid through Cash			
			Central tax	State tax / UT tax	Integrated tax	Cess, if applicable
A	5%	0.00	0.00	0.00	0.00	0.00
A1	6%					
B	12%	0.00	0.00	0.00	0.00	0.00
C	18%	0.00	0.00	0.00	0.00	0.00
D	28%	0.00	0.00	0.00	0.00	0.00

E	3%	0.00	0.00	0.00	0.00	0.00
F	0.25%					
G	0.10%					
H	Input Tax Credit	0.00	0.00	0.00	0.00	0.00
I	Interest	0.00	0.00	0.00	0.00	0.00
J	Late Fee	0.00	0.00	0.00	0.00	0.00
K	Penalty	0.00	0.00	0.00	0.00	0.00
L	Any other amount paid for supplies not included in Annual Return	0.00	0.00	0.00	0.00	0.00
M	Erroneous refund to be paid back	0.00	0.00	0.00	0.00	0.00
N	Outstanding demands to be settled	0.00	0.00	0.00	0.00	0.00
O	Other (Pl. specify)	0.00	0.00	0.00	0.00	0.00

Verification:

I hereby solemnly affirm and declare that the information given herein above is true and correct to the best of my knowledge and belief and nothing has been concealed there from.

**(Signature and stamp/Seal of the Auditor)

Place: Hyderabad

Name of the signatory: Bonam Subba Reddy

Membership No : 239110

Date: 25/11/2020

Full address: 4th Floor West Block, 4th Floor, Srida Anushka Pride, Road No 12, Hyderabad, Hyderabad, Telangana, 500034

PAN details for digital signature: CDFPR5878B

PART – B
CERTIFICATION

II. Certification in cases where the reconciliation statement (FORM GSTR-9C) is drawn up by a person other than the person who had conducted the audit of the accounts:

I report that the audit of the books of accounts and the financial statements of M/s.B&C ESTATES , 5-4-187/3 and 4, 3rd floor, Soham mansion, mg road, secunderabad, Hyderabad, Telangana, 500003, 36AAHFB7046A1ZT was conducted by M/ s. Ajay Mehta , 5-4-187/3 and 4, 2nd floor, Soham mansion, mg road, secunderabad, Hyderbad, Telangana, 500003 , bearing membership number 35449 in pursuance of the provisions of the Institute of Chartered Accountants of India Act, and I annex hereto a copy of their audit report dated 15/10/2019 along with a copy of each of :-

(a) balance sheet as on 31/03/2019
(b) the profit and loss account for the period beginning from 01/04/2018 to ending on 31/03/2019
(c) the cash flow statement for the period beginning from to ending on and
(d) documents declared by the said Act to be part of, or annexed to, the profit and loss account and balance sheet.

2. I report that the said registered person—
has maintained the books of accounts, records and documents as required by the IGST/CGST/State/UT GST Act, 2017 and the rules/ notifcations made/issued thereunder:

3. The documents required to be furnished under section 35 (5) of the CGST Act/SGST Act and Reconciliation Statement required to be furnished under section 44(2) of the CGST Act/SGST Act is annexed herewith in Form No.GSTR-9C.

4. In my opinion and to the best of my information and according to examination of books of account including other relevant

documents and explanations given to me, the particulars given in the said Form No.9C are true and correct subject to the following observations/qualifications, if any:

1. We have verified the compliance with the provisions of GST laws on test check basis in accordance with the Auditing Standards generally accepted in India which include test checks and the concept of materiality We have relied on the audited books of accounts regarding financial reports matching with the books of accounts accounting of all sales purchases and other financial transactions

2. We have verified the Schedule I transactions based on the details given by the registered person on test check basis It is not possible for us to identify the Schedule I transactions not recorded or not reported to us.

3. The expenses wise details of ITC are computed by the registered person and we have verified the same on test check basis The classification of expenses has been done by the registered person based on the accounting treatment of such expenses

4. We have verified the compliance with the provisions of GST laws regarding ITC on test check basis in accordance with the Auditing Standards generally accepted in India It is not possible for us to verify and confirm whether tax has been paid by the supplier on such inward supplies or not in the absence of any facility in the GST portal to verify the same.

5. We have verified the compliance with the provisions of GST laws regarding reverse charge mechanism on test check basis in accordance with the Auditing Standards generally accepted in India.

6. We have not verified the compliance of anti profiteering provisions as there is no specific requirement.

7. We have verified the documentation such as tax invoices delivery challans on test check basis.

8. Wherever there are interpretational issues due to lack of clarity in the law or procedure or general industry practice we have not recommended for discharging liability under Part V.

**(Signature and stamp/Seal of the Auditor)

Place: Hyderabad
Name of the signatory: Bonam Subba Reddy
Membership No: 239110
Date: 25/11/2020
Full address: 4th Floor West Block, 4th Floor, Srida Anushka Pride, Road No 12, Hyderabad, Hyderabad, Telangana, 500034

Verification of registered person

I hereby solemnly affirm and declare that I am uploading the reconciliation statement in Form GSTR-9C prepared and duly signed by the Auditor and the nothing has been tempered or altered by me in the statement. I am also uploading other statements, as applicable, including financial statement, profit and loss account and balance sheet etc.

Name of the Authorised Signatory
SOHAM MODI

Date - 25-11-2020

Designation/Status
Managing Partner