



**GST – First Time Compliance**  
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**Brahmayya & co.**

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## Introduction

With the implementation of GST, the businesses are mandatorily required to file monthly return along with requisite quarterly and annual return. There will be three compliance events every month as compared to one event under the previous tax regime. This means businesses need to comply with requirement of filing Form GSTR-1, Form GSTR-2 and Form GSTR-3. For taxpayer, other than person opting for composite scheme, non resident taxpayer, input service distributor, tax deductor and ecommerce operator, the count reaches to almost 37 returns a year.

## Types of Returns

	Description	Who files	Filing Date
GSTR - 1	Monthly Statement of outward supplies of goods or services	Registered Taxable Supplier	10th of the succeeding month
GSTR – 2	Monthly Statement of inward supplies of goods or services	Registered Taxable Recipient	15th of the succeeding month
GSTR – 3	Monthly Return for a normal taxpayer	Registered Taxable Person	20th of the succeeding month
GSTR – 4	Quarterly Return for compounding taxable person	Composition Supplier	18th of the month succeeding a quarter
GSTR – 5	Monthly return for a Non-Resident Taxpayer	Non Resident Taxable Person	20th of the month succeeding the tax period
GSTR – 6	Monthly Return for Input Service Distributor	Input Service Distributor	13th of the succeeding month
GSTR – 7	Monthly Return for authorities deducting tax at source	Tax Deductor	10th of the succeeding month
GSTR – 8	Monthly Return for Tax Collected at Source by the E-Commerce Operator	E-Commerce Operator/Tax Collector	10th of the succeeding month
GSTR – 9	Annual Return	Registered Taxable Person	31st December of next financial year
GSTR – 10	Final Return	Taxable Person whose Registration has been cancelled or surrendered	Within 3 months of the date of cancellation or date of cancellation order, whichever is later.
GSTR – 11	Inward Supplies of person having Unique Identification Number	Person having UIN and claiming refund	28th of the month following the month for which statement is filed

### First Time Compliance

The first compliance event of filing Form GSTR-1 is due on 10th of the subsequent month of the rollout which is 10th of August 2017. However, the Central Government has deferred the due date for filing GSTR – 1 and GSTR – 2 returns for the first two months of its rollout i.e July, 2017 and August,2017; stating that the tax payable should be in Form GSTR-3B containing Outward and Inward Supplies to be submitted before 20th of the succeeding month.

The timelines specified are:

Month	GSTR – 3B	GSTR – 1	GSTR – 2 (Auto Populated)
July	20 <sup>th</sup> August	1 <sup>st</sup> – 5 <sup>th</sup> September	6 <sup>th</sup> – 10 <sup>th</sup> September
August	20 <sup>th</sup> September	16 <sup>th</sup> – 20 <sup>th</sup> September	21 <sup>st</sup> to 25 <sup>th</sup> September

There will be no late fee or penalty levied for the initial two months. Further, compliance for the month of September and onwards, the taxpayers would have to follow the regular provisions of filing Returns by 10th, 15th and 20th of next month.

Goods and Service Tax Network (GSTN) has provided excel based utilities. The taxpayers can maintain their daily records in this excel utility offline and upload it on the GST portal on or before the respective due date. With this offline utility, the Government has facilitated the taxpayers in preparing and filing their monthly Return with maximum ease and minimum cost.

### Details to be provided in GSTR – 3B

- Value and Amount of Outward Supply(for Nil rated, Exempted, Zero Rated & Taxable Supply)
- Value & Amount of Inward Supply(payable under Reverse Charge Mechanism)
- Interstate Supply made to unregistered dealer, composition dealer & UIN holder
- Details of Input Tax Credit
- Value & Amount of Inward Supply(exempt, nil rated & Non GST)
- Payment of Tax(Tax payable, ITC, Interest, late fee)
- Details of TDS/TCS Credits

It is to be noted that, currently, GSTR - 3B doesn't provide for carry-forward of eligible credits available under the pre-GST regime (i.e. excise duty, service tax and value-added tax). Hence, registered taxpayers will not be able to adjust taxes paid against their output liability during the interim period which may result in a cash flow issue.

### Conclusions

Such a large tax reform would be prone to difficulties, arithmetical and technical. It would take time to settle down. In the meanwhile, various representations are being made by the tax payer. Government has been taking adequate steps to address them. Let us gear up!

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