

Clause by clause analysis of Revenue items & outward supply disclosures in Annual Returns - GST Audit Series (Part 4)



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Introduction:

Filing of the annual return is not entirely a new phenomenon for taxpayers who were required to file annual return and submit reconciliation certificate by the specified persons including Chartered Accountant under the State VAT laws. Under central excise law also certain annual information such as total consumption of input, input output ratio, electricity consumption details were specified for some larger enterprises which however did not require any certification. Service tax law did not have any of such requirements except half yearly filing of returns.

Annual return is an opportunity to validate the tax positions with an intent to rectify the errors & omissions, if any. Therefore, detailed verification including proper disclosures in the annual return can save a taxpayer from unnecessary demands during departmental scrutiny/ audits etc. Hence, in this article we shall discuss each and every field of the annual returns and what information is required to be disclosed in each such field from the revenue and outward supply standpoint.

Table 4 of GSTR 9 - Reporting of details of advance, inward or outward supplies made during the financial year on which tax is payable

Table 4 provides for reporting of all supplies (i.e., outward supplies and RCM transactions) This table could include the transactions classified under:

1. Transactions which are already considered in the GSTR 3B returns and tax on it is duly paid) and
2. Transactions which are not at all considered in the GSTR 3B returns of any financial year(s).

The clause-by-clause analysis of each of the table provided below:

Ta. Ref	Description	Reference to fill information	Instruction provided in form
4A	Supplies made to un-registered persons (B2C)	<ul style="list-style-type: none"> • Sum of supplies to all unregistered persons, consumers or supplies to registered persons who have not been provided with GSTIN. 	<i>Aggregate value of supplies made to consumers and unregistered persons on which tax has been paid shall be declared here.</i>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		<ul style="list-style-type: none"> • Amounts to be furnished should be net of debit/credit notes and amendments, if any. • Refer GSTR-1 Table 5,7,9 & 10 which covers taxable outward supplies to unregistered persons with invoice value more than INR 2.5 lakh, taxable supplies with less than INR 2.5 lakh, supplies through E-commerce operators, amendments made to supply details furnished in earlier tax periods. • Details must be provided along with the tax break up. • This could also cover supply of services to customers outside India which do not qualify as export of services. It may be noted that goods exported should not be included here as taking out goods from India would be considered as export as per IGST law. • The Amendments made to the reported figures during the FY 2021-22 would be disclosed in table 4I to 4L. • The credit note, debit note or amendments relating to FY 20-21 but disclosed in FY 21-22 would be disclosed in Part V and not in Part II. • Any omission made in GSTR-3B for the financial year may be added here to discharge the liability unless already considered in GSTR-3B filed for April to October of subsequent year. 	<p><i>These will include details of supplies made through E-Commerce operators and are to be declared as net of credit notes or debit notes issued in this regard. Table 5, Table 7 along with respective amendments in Table 9 and Table 10 of FORM GSTR-1 may be used for filling up these details.</i></p>
4B	Supplies made to registered persons (B2B)	<ul style="list-style-type: none"> • Sum of all B2B supplies (tax invoices issued) other than zero rated and deemed exports to be provided. • Refer GSTR-1 Table 4A & 4C. • Details must be provided along with the tax break up. • Details of supplies wherein recipient is liable to pay tax under reverse charge must not 	<p><i>Aggregate value of supplies made to registered persons (including supplies made to UINs) on which tax has been paid shall be declared here. These will include supplies made through E-Commerce operators but shall not include supplies on which tax is to be paid by the recipient</i></p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		<p>be included here.</p> <ul style="list-style-type: none"> • Merchant exporting in terms of notification 41/2017 IGST-Rate dated 23rd October 2017, will be reported here. • Supplies made to UIN holders will be reported here, though they are not a 'registered person'. • The credit note, debit note, or amendments made to the reported figures during the FY 2021-22 will be disclosed in table 4I to 4L. Option to show outward supplies such as B2B, SEZ supplies, export, deemed export net of credit/debit notes & amendments instead of separate disclosure in table 4I to 4L. • The credit note, debit note or amendments relating to FY 20-21 but disclosed in FY 21-22 will be disclosed in Part V. • Any omission made in GSTR-3B for the financial year may be added here unless already considered in GSTR-3B filed for April to October of subsequent year. 	<p><i>on reverse charge basis. Details of debit and credit notes are to be mentioned separately. Table 4A and Table 4C of FORM GSTR-1 may be used for filling up these details.</i></p>
4C	Zero rated supply (Export) on payment of tax (except supplies to SEZs)	<ul style="list-style-type: none"> • Sum of all Exports (Goods & Services) made against payment of tax excluding SEZ supplies to be provided. • Exports made without payment of tax under LUT, or bond should not be reported here. • Refer GSTR-1 Table 6A. • Details with tax break up to be provided. • There is a difference in 'deemed exports' and 'exports', only 'actual exports' on payment of tax will be shown here. Deemed exports will be disclosed in table 4E. • The credit note, debit note, or amendments made to the reported figures during the FY 2021-22 will be disclosed in 	<p><i>Aggregate value of exports (except supplies to SEZs) on which tax has been paid shall be declared here. Table 6A of FORM GSTR-1 may be used for filling up these details.</i></p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		<p>table 4I to 4L.</p> <ul style="list-style-type: none"> • The credit note, debit note or amendments relating to FY 20-21 but disclosed in FY 21-22 will be disclosed in Part V. • Any omission made in GSTR-3B for the financial year may be added here unless already considered in GSTR-3B filed for April to October of subsequent year. 	
4D	Supply to SEZs on payment of tax	<ul style="list-style-type: none"> • Sum of all SEZ supplies made against payment of tax to be provided here. • Refer GSTR-1 Table 6B. • Details with tax break up to be provided. • Any omission made in GSTR-3B for the financial year may be added here unless already considered in GSTR-3B filed for April to October of subsequent year. 	<i>Aggregate value of supplies to SEZs on which tax has been paid shall be declared here. Table 6B of GSTR-1 may be used for filling up these details.</i>
4E	Deemed Exports	<ul style="list-style-type: none"> • Sum of all deemed exports to be provided. • Refer Table 6C of GSTR-1. • Details with tax break up to be provided. • This includes supplies to EOUs, supplies against advance authorisation scheme, EPCG license and supply of gold by bank/PSU specified in notification No.50/2017-Customs. • The credit note, debit note or amendments made to the reported figures during the FY 2021-22 will be disclosed in table 4I to 4L. • The credit note, debit note or amendments relating to FY 20-21 but disclosed in FY 21-22 will be disclosed in Part V. • Any omission made in GSTR-3B for the financial year may be added here unless already considered in GSTR-3B filed for April to October of subsequent 	<i>Aggregate value of supplies in the nature of deemed exports on which tax has been paid shall be declared here. Table 6C of FORM GSTR-1 may be used for filling up these details.</i>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		year.	
4F	Advances on which tax has been paid but invoice has not been issued (not covered under (A) to (E) above)	<ul style="list-style-type: none"> • Sum of all advances which remain unadjusted (i.e., tax invoice not raised) as on the last day of the previous financial year on which tax has been paid needs to be disclosed here. • Refer GSTR-1 Table 11A + 11B + separate workings to arrive at these details. • Ex: Total advances received for FY 2021-22 is INR50 lakh. Invoices issued for INR40 lakh in the year. In this column, the balance amount of INR10 lakh which was subject to GST to be disclosed. • At present advance for supply of services is liable to GST. • Any omission made in GSTR-3B for the financial year may be added here unless already considered in GSTR-3B filed for April to October of subsequent year i.e., in April- October of 2022. 	<p><i>Details of all unadjusted advances i.e., advance has been received and tax has been paid but invoice has not been issued in the current year shall be declared here. Table 11A of FORM GSTR-1 may be used for filling up these details.</i></p>
4G	Inward supplies on which tax is to be paid on reverse charge basis	<ul style="list-style-type: none"> • Sum of all supplies on which tax has been paid under reverse charge mechanism must be disclosed here. • Refer GSTR-3B Table 3.1(d) • This includes procurements under section 9(3) and 9(4) of the CGST Act 2017 including section 5(3) and 5(4) of IGST Act 2017 covering procurements from registered and unregistered persons. • Only the net taxable amount to be disclosed here. For ex: If total invoice value is INR 9,440/- and taxable value is INR 8,000/- then, only INR 8,000/- must be disclosed here. • Taxes paid on import of goods shall not be reported here as it is not paid under reverse 	<p><i>Aggregate value of all inward supplies (including advances and net of credit and debit notes) on which tax is to be paid by the recipient (i.e. by the person filing the annual return) on reverse charge basis. This shall include supplies received from registered persons, unregistered persons on which tax is levied on reverse charge basis. This shall also include aggregate value of all import of services. Table 3.1(d) of FORM GSTR-3B may be used for filling up these details.</i></p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		<p>charge basis. Undisclosed liability can be disclosed here provided it has not been disclosed and discharged in GSTR-3B during the period April to October of subsequent financial year. In case the tax liability under RCM is disclosed and discharged in the subsequent financial year(s) then it needs to be reported in the annual return of that financial year.</p>	
4H	Sub-total (A to G above)	<i>Auto-Populated</i>	
4I	Credit Notes issued in respect of transactions specified in (B) to (E) above (-)	<ul style="list-style-type: none"> ● Sum of all credit notes issued against B2B supplies with payment of tax, including zero rated supplies & deemed exports to be reported which are issued in the financial year to be provided here. <p>Any undisclosed credit notes issued for the financial year and is not disclosed in GSTR-3B but reported in GSTR-1 of April to October of subsequent financial year then the details of such credit note need to be considered here. For ex: Credit note dated 20.03.2022 not disclosed or given effect in GSTR-3B till October 2022 but shown GSTR-1. Such credit note details can be provided here.</p> <ul style="list-style-type: none"> ● Refer GSTR-1 Table 9B ● Credit notes issued and disclosed in GSTR-3B of FY can only be considered here. ● Credit notes issued in the same financial year and disclosed in the GSTR 3B of the same financial year then it needs to be disclosed here. However, if they are disclosed in the GSTR 3B between April to October of 	<p><i>Aggregate value of credit notes issued in respect of B-to-B supplies (4B), exports (4C), supplies to SEZs (4D) and deemed exports (4E) shall be declared here. Table 9B of FORM GSTR-1 may be used for filling up these details.</i></p> <p><i>For FY 2017-18, 2018-19, 2019-20 and 2020-21, the registered person shall have an option to fill Table 4B to Table 4E net of credit notes in case there is any difficulty in reporting such details separately in this table.</i></p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		<p>subsequent year, then it to be shown in part V of this form.</p> <ul style="list-style-type: none"> ● Credit notes issued in respect of B2C domestic supplies will not be shown here and will be adjusted in table 4A. ● Financial credit notes, not bearing any GST impact will not be reported here. ● Credit notes issued during the FY 21-22 for supplies relating to FY 20-21, two views are there: <ul style="list-style-type: none"> (i) Report it in part V of GSTR 9 and the corresponding impact will be in table 5E of GSTR 9C, (or) (ii) Do not disclose at all in GSTR 9 of the FY 2021-22 and disclose in the annual return of FY 2022-23 only. ● Credit notes should have been issued in accordance with Section 34 of CGST Act 2017 which could be due to excess taxable value or tax amount or return of goods by customer or supplied goods/ services found to be deficient. Date of document of the credit note is important. 	
4J	Debit Notes issued in respect of transactions specified in (B) to (E) above (+)	<ul style="list-style-type: none"> ● Sum of all debit notes issued against B2B supplies with payment of tax, including zero rated supplies & deemed exports. ● Refer GSTR-1 Table 9B to be provided. ● Debit notes issued and disclosed in GSTR-1 should only be considered here. ● Debit notes issued in respect of B2C domestic supplies will not be shown here and will be adjusted in table 4A. ● Financial debit notes, not bearing any GST impact will not be shown here. ● Debit notes issued during the FY 21-22 for supplies relating 	<p><i>Aggregate value of debit notes issued in respect of B-to-B supplies (4B), exports (4C), supplies to SEZs (4D) and deemed exports (4E) shall be declared here. Table 9B of FORM GSTR-1 may be used for filling up these details.</i></p> <p><i>For FY 2017-18, 2018-19, 2019-20 and 2020-21, the registered person shall have an option to fill Table 4B to Table 4E net of debit notes in case there is any difficulty in reporting such details separately in this Table.</i></p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		<p>to FY 20-21, two views are possible:</p> <p>(i) Report it in part V and the impact will be table 5O of GSTR 9C as no specific column is provided in this regard in GSR 9C, or</p> <p>(ii) Do not disclose if GSTR 9 of the FY 20-21 and just show in the GTSR 9 of FY 21-22.</p> <ul style="list-style-type: none"> Debit notes issued in the same financial year and disclosed in the GSTR 3B of the same financial year then it needs to be disclosed here. However, if they are disclosed in the GSTR 3B between April to October of subsequent year, then it to be shown in part V of this form. Debit notes should have been issued in accordance with Section 34 of CGST Act 2017 which could be issued when taxable value or tax amount charged found to be less than actuals. 	
4K	Supplies/tax declared through Amendments (+)	<ul style="list-style-type: none"> Sum of amendments made to all supplies with payment of tax including B2B supplies, deemed exports on payment of tax, SEZ supplies on payment of tax, direct exports on payment of tax, credit and debit notes (except B2C supplies), which has resulted in addition in value of supplies/tax being reported. Refer GSTR-1 Table 9A & 9C. This table has to be filed with the differential value (i.e. original supply was shown as INR 100 in GSTR-1 which was subsequently modified to INR 1000. This table will have differential value i.e. INR 900) Amendments made within financial year (before end of March) should only be considered here. 	<p><i>Details of amendments made to B-to-B supplies (4B), exports (4C), supplies to SEZs (4D) and deemed exports (4E), credit notes (4I), debit notes (4J) and refund vouchers shall be declared here. Table 9A and Table 9C of FORM GSTR-1 may be used for filling up these details.</i></p> <p><i>For FY 2017-18, 2018-19, 2019-20 and 2020-21, the registered person shall have an option to fill Table 4B to Table 4E net of amendments in case there is any difficulty in reporting such details separately in this table.</i></p>
4L	Supplies/tax	<ul style="list-style-type: none"> Sum of amendments made to all 	<p><i>Details of amendments</i></p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
	reduced through Amendments (-)	<p>supplies with payment of tax including B2B supplies, deemed exports on payment of tax, SEZ supplies on payment of tax, direct exports on payment of tax, credit and debit notes (except B2C supplies), which has resulted in reduction in value of supplies/tax being reported.</p> <ul style="list-style-type: none"> Refer GSTR-1 Table 9A & 9C. Amendments made within financial year (before end of March) should only be considered here. 	<p>made to B-to-B supplies (4B), exports (4C), supplies to SEZs (4D) and deemed exports (4E), credit notes (4I), debit notes (4J) and refund vouchers shall be declared here. Table 9A and Table 9C of FORM GSTR-1 may be used for filling up these details.</p> <p>For FY 2017-18, 2018-19, 2019-20 and 2020-21, the registered person shall have an option to fill Table 4B to Table 4E net of amendments in case there is any difficulty in reporting such details separately in this table.</p>
4M	Sub-total (I to L above)	Auto-Populated	
4N	Supplies and advances on which tax is to be paid (H + M) above	Auto-Populated	

Table 5 of GSTR 9 - Reporting of all other supplies (i.e., supplies without payment of tax and exempt) made by the registered person during the financial year

Ta. Ref	Description	Reference to fill information	Instruction provided in form
5A	Zero rated supply (Export) without payment of tax	<ul style="list-style-type: none"> Sum of all direct exports (Goods & Services) made without payment of tax other than SEZ supplies to be declared. Presumably under Letter of Undertaking/ Bond. Refer GSTR-1 Table 6A. 	<p>Aggregate value of exports (except supplies to SEZs) on which tax has not been paid shall be declared here. Table 6A of FORM GSTR-1 may be used for filling up these details.</p>
5B	Supply to SEZs without payment of tax	<ul style="list-style-type: none"> Sum of all SEZ supplies made without payment of tax under LUT needs to be disclosed here. Refer GSTR-1 Table 6B. 	<p>Aggregate value of supplies to SEZs on which tax has not been paid shall be declared here. Table 6B of GSTR-1 may be used for filling up these details.</p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
5C	Supplies on which tax is to be paid by the recipient on reverse charge basis	<ul style="list-style-type: none"> Sum of supplies made by the registered persons, where the liability to pay tax is on the recipient under reverse charge. The details of such outward supplies must be disclosed here. For ex: If an assessee is in the business of Goods Transportation Agency and in respect of the transportation services provided, the tax is paid by the recipient under reverse charge, then such transporter assessee must disclose the details of such supplies here. Refer GSTR-1 Table 4B This could also include other transactions liable under RCM viz., sponsorship services, legal services, director services etc. 	<p><i>Aggregate value of supplies made to registered persons on which tax is payable by the recipient on reverse charge basis. Details of debit and credit notes are to be mentioned separately. Table 4B of Form GSTR-1 may be used for filling up these details.</i></p>
5D	Exempted	<ul style="list-style-type: none"> Sum of all exempt supplies must be disclosed here. (i.e. taxable supplies which are exempted under any specific exemption notification). Refer GSTR-1 Table 8 'No supply' could be those activities which are covered in Schedule III to CGST Act 2017 such as supply of land or supply of building after completion certificate, high seas sale, reimbursement as pure agent. Further, any other items of revenues in books which cannot be regard as a supply also gets covered in 'No Supply'. For ex: Dividend income, Duty Drawback claim, provisional income etc. The option is available to consolidate the exempt, Nil rated & No supply details (Table 5D, 5E & 5F) under exempt supplies for the FY 2018-19, 2020-21 and 2021-22 	<p><i>Aggregate value of exempted, Nil Rated and Non-GST supplies shall be declared here. Table 8 of Form GSTR-1 may be used for filling up these details. The value of "no supply" shall also be declared here.</i></p> <p><i>For FY 2017-18, 2018-19, 2019-20 and 2020-21, the registered person shall have an option to either separately report his supplies as exempted, nil rated, and non-GST supply or report consolidated information for all these three heads in the 'exempted' row only.</i></p> <p><i>For FY 2021-22, the registered person shall report non-GST supply (5F) separately and shall have an option to either separately report his supplies as exempted and nil rated supply or report consolidated</i></p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
			<p>information for these two heads in the “exempted” row only.</p>
5E	Nil Rated	<ul style="list-style-type: none"> Sum of all supplies wherein the rate of GST is ‘Nil’ must be disclosed here. Refer GSTR-1 Table 8. Tax rate for certain supplies is given as Nil in Noti.no.11/2017 (Rate). The option is available to consolidate the exempt, Nil rated & No supply details (Table 5D, 5E & 5F) under exempt supplies for the FY 2018-19, 2020-21 and 2021-22 	<p>Aggregate value of exempted, Nil Rated and Non-GST supplies shall be declared here. Table 8 of FORM GSTR-1 may be used for filling up these details. The value of “no supply” shall also be declared here.</p> <p>For FY 2017-18, 2018-19, 2019-20 and 2020-21, the registered person shall have an option to either separately report his supplies as exempted, nil rated, and non-GST supply or report consolidated information for all these three heads in the ‘exempted’ row only.</p> <p>For FY 2021-22, the registered person shall report non-GST supply (5F) separately and shall have an option to either separately report his supplies as exempted and nil rated supply or report consolidated information for these two heads in the “exempted” row only.</p>
5F	Non-GST Supply	<ul style="list-style-type: none"> Sum of all supplies which are outside the levy of GST such as supply of petrol, diesel, petroleum crude, natural gas, ATF and alcohol etc. needs to be disclosed here. Refer GSTR-1 Table 8-Worksheet for D, E and F items would be necessary which could help the auditor. The option is available to consolidate the exempt, Nil rated & No supply details under exempt supplies for the 	<p>Aggregate value of exempted, Nil Rated and Non-GST supplies shall be declared here. Table 8 of FORM GSTR-1 may be used for filling up these details. The value of “no supply” shall also be declared here.</p> <p>For FY 2017-18, 2018-19, 2019-20 and 2020-21, the registered person shall have an option to either separately report his supplies as</p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		FY 2018-19, 2020-21 and 2021-22.	<p><i>exempted, nil rated, and non-GST supply or report consolidated information for all these three heads in the 'exempted' row only.</i></p> <p><i>For FY 2021-22, the registered person shall report non-GST supply (5F) separately and shall have an option to either separately report his supplies as exempted and nil rated supply or report consolidated information for these two heads in the "exempted" row only.</i></p> <p>Press release clarification: <i>Vide press release dated 03.07.2019, it has been clarified that since there is some overlap between supplies that are classifiable as exempted and nil rated and since there is no tax payable on such supplies, if there is a reasonable/explainable overlap of information reported across these tables, such overlap will not be viewed adversely. The other concern raised by taxpayers is the inclusion of no supply in the category of non-GST supplies in Table 5F. For the purposes of reporting, non-GST supplies includes supply of alcoholic liquor for human consumption, motor spirit (commonly known as petrol), high speed diesel, aviation turbine fuel, petroleum crude and natural gas and transactions specified in Schedule III of the CGST Act.</i></p>
5G	Sub-total (A to F above)	Auto-Populated	

Ta. Ref	Description	Reference to fill information	Instruction provided in form
5H	Credit Notes issued in respect of transactions specified in A to F above (-)	<ul style="list-style-type: none"> Sum of all credit notes issued with respect to above transactions to be reported here. Refer GSTR-1 Table 9B. This covers even credit notes issued in respect of non-taxable/exempt supplies. 	<p><i>Aggregate value of credit notes issued in respect of supplies declared in 5A, 5B, 5C, 5D, 5E and 5F shall be declared here. Table 9B of FORM GSTR-1 may be used for filling up these details.</i></p> <p><i>For FY 2017-18, 2018-19, 2019-20, 2020-21 & 2021-22, the registered person shall have an option to fill Table 5A to Table 5F net of credit notes in case there is any difficulty in reporting such details separately in this Table.</i></p>
5I	Debit Notes issued in respect of transactions specified in A to F above (+)	<ul style="list-style-type: none"> Sum of all debit notes issued with respect to above transactions to be reported here. Refer GSTR-1 Table 9B. 	<p><i>Aggregate value of debit notes issued in respect of supplies declared in 5A, 5B, 5C, 5D, 5E and 5F shall be declared here. Table 9B of FORM GSTR-1 may be used for filling up these details.</i></p> <p><i>For FY 2017-18, 2018-19, 2019-20, 2020-21 and 2021-22, the registered person shall have an option to fill Table 5A to Table 5F net of credit notes in case there is any difficulty in reporting such details separately in this Table.</i></p>
5J	Supplies declared through Amendments (+)	<ul style="list-style-type: none"> Sum of amendments made to all supplies without payment of tax, which has resulted in addition in value of supplies to be reported here. Refer GSTR-1 Table 9A & 9C. 	<p><i>Details of amendments made to exports (except supplies to SEZs) and supplies to SEZs on which tax has not been paid shall be declared here. Table 9A and Table 9C of FORM GSTR-1 may be used for filling up these details.</i></p> <p><i>For FY 2017-18, 2018-19, 2019-20, 2020-21 and 2021-22, the registered person shall have an option to fill Table 5A to Table 5F net of amendments in case there is</i></p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
			<i>any difficulty in reporting such details separately in this Table.</i>
5K	Supplies reduced through Amendments (-)	<ul style="list-style-type: none"> Sum of amendments made to all supplies without payment of tax, which has resulted in reduction in value of supplies to be reported here. Refer GSTR-1 Table 9A & 9C. 	<p><i>Details of amendments made to exports (except supplies to SEZs) and supplies to SEZs on which tax has not been paid shall be declared here. Table 9A and Table 9C of FORM GSTR-1 may be used for filling up these details.</i></p> <p><i>For FY 2017-18, 2018-19, 2019-20, 2020-21 and 2021-22, the registered person shall have an option to fill Table 5A to Table 5F net of amendments in case there is any difficulty in reporting such details separately in this Table.</i></p>
5L	Sub-Total (H to K above)	<i>Auto-Populated</i>	
5M	Turnover on which tax is not to be paid (G + L above)	<i>Auto-Populated</i>	
5N	Total Turnover (including advances) (4N + 5M - 4G above)	<i>Auto-Populated</i>	<p><i>Total turnover including the sum of all the supplies (with additional supplies and amendments) on which tax is payable and tax is not payable shall be declared here. This shall also include amount of advances on which tax is paid but invoices have not been issued in the current year. However, this shall not include the aggregate value of inward supplies on which tax is paid by the recipient (i.e., by the person filing the annual return) on reverse charge basis.</i></p>

Additional checks to be performed for Table 5 of GSTR 9

1. Supply of goods to merchant exports is not exempted supply. Therefore, it should not be disclosed here. It would be disclosed in Table 4B. Supply of exempted goods in course of export would be eligible for ITC on inputs and input services. If well within the time limit, then ITC can be taken.
2. Amendments have been made to schedule III to include supplies such as high sea sales, merchanting trades, supply of warehouse goods before clearance from customs warehouse. These transactions could be reported in column 5F.
3. Column 5F can also include the 'pure agent' reimbursements. There is no provision in GSTR-3B to disclose these reimbursements. There is a practice to disclose such amounts as exempted supply turnover in GSTR-3B which is also not right as this may have impact on rule 42 and rule 43 compliance for reversal of ITC. When the amounts are not shown, then such amounts can be disclosed in column 5F. A comment/ observation can also be made in GSTR-9C to avoid confusion as to reversal of ITC.
4. Transactions with distinct persons (branches/ regional offices etc.) would not be part of financial statements. However, impact under GST in terms of Schedule I to CGST Act 2017 to be considered where there is a liability. If registered, then the transactions should be disclosed in 4B/4I/4J.
5. In case of exports, validity of documents such as LUT/ Bond can be reviewed. In case of any deficiency, appropriate action to renew it or obtain with condonation of delay to be considered. LUT where not filed, ensure letter for condonation of delay is available or where possible, LUT has been filed manually to the jurisdictional officer.
6. There could also be mistake in type of tax paid. IGST liability would have been discharged as CGST & SGST or vice versa. Appropriate adjustments can be considered while filing annual return or the application of section 77 (CGST) or section 19(IGST) considering the situation at hand. Classification of supplies including rate of taxes applied can also be reviewed for confirmation. Action for short or excess payment could be taken.
7. In case of any advance amounts which are liable for GST but not paid till now, then details can be disclosed in table 4F to discharge the GST through DRC-03.

Table 10 & 11 of GSTR 9 – Reporting of transactions for the financial year declared in returns of the next financial year till the specified period.

Ta. Ref	Description	Reference to fill information	Instruction provided in form
10	Supplies/tax declared through Amendments (+) (net of debit notes)	<ul style="list-style-type: none"> • Outward supplies of previous FY reported in current FY – Additional invoice reported in GSTR-1 of current FY pertaining to previous FY. For example: Invoice dated 31.11.2021, reported in GSTR-3B of May 2022. • Details of debit notes 	<i>For FY 2021-22, Details of additions or amendments to any of the supplies already declared in the returns of the previous financial year but such amendments were furnished in Table 9A, Table 9B and Table 9C of Form GSTR-1 of April 2022 to October 2022 shall be</i>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		<p>reported in current FY against supplies reported in previous FY to be provided here. Ex: Debit note dated 31.01.2022 reported in June 2022.</p> <ul style="list-style-type: none"> • Amendments made in the value of supplies/tax paid against invoices reported in previous FY needs to be reported here. Ex: Total supply value in May 2021 is INR 10 lakh but reported as INR 9 lakh. Balance 1 lakh reported in April 2022. Amendments made only in GSTR 1 but not in GSTR 3B must not be considered here. • It must be noted that RCM for the FY if paid in the subsequent FY, then it need not be reported here and instead it must be reported in the Annual return of the subsequent financial year in which it is paid. This is clarified by CBIC vide Press release issued Dated 03.07.2019. • Further, it is also clarified that if the debit note for any supply was issued and declared in returns of the next FY and the provision for it has been made in the books of accounts for the current FY, then it shall be declared in Pt. V of the annual return. • Details of financial/commercial debit notes need not be disclosed here as there is no GST implication on it. • It must be noted that debit notes issued in subsequent FY for invoice raised in the previous FY need not be reported here. 	<p><i>declared here.</i></p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		<p>Since the debit note itself is issued in subsequent FY, it would appear in the Annual returns of that FY in which it is issued.</p> <ul style="list-style-type: none"> Refer GSTR-3B Table 9 and Table 10. 	
11	Supplies/tax reduced through Amendments (-) (net of credit notes)	<ul style="list-style-type: none"> Details of credit notes reported in current FY between April to September against supplies reported in previous FY to be provided here. Ex: Credit note dated 25.11.2021 reported in 30.06.2022. Amendments made in the value of supplies/tax paid against invoices reported in previous FY needs to be reported here. Further, it is also clarified that if the credit note for any supply was issued and declared in returns of the next FY and the provision for it has been made in the books of accounts for the current FY, then it shall be declared in Pt. V of the annual return. It must be noted that credit notes issued in subsequent FY for invoice raised in the previous FY need not be reported here. Since the credit note itself is issued in subsequent FY, it would appear in the Annual returns of that FY in which it is issued. Details of financial/commercial credit notes need not be disclosed here as there is no GST implication on it. <p>Note: Amendments made based on Circular 26/26/2017 in the GSTR</p>	<p><i>For FY 2021-22, Details of additions or amendments to any of the supplies already declared in the returns of the previous financial year but such amendments were furnished in Table 9A, Table 9B and Table 9C of Form GSTR-1 of April 2022 to October 2022 shall be declared here.</i></p>

Ta. Ref	Description	Reference to fill information	Instruction provided in form
		<p><i>3B of subsequent FY would be relevant.</i></p> <ul style="list-style-type: none"> Refer GSTR-3B Table 9 and Table 10. 	

Additional points for Table 10 & 11

1. Due to wordings used in the returns and instructions, it is quite common to get confused on disclosing of information between Part II of Form GSTR 9 and Part V of Form GSTR 9. It is important to collate the information of amendments made including debit note and credit note including dates and the year of supply it belongs to.
2. Table 10 can contain the details of debit note dated in previous financial year but reported in subsequent financial years return. It can also include tax invoices dated in previous financial year but reported between April to September of subsequent financial year. It can also include amendment made increasing the turnover through GSTR-1 as well.
3. Table 11 can contain the details of credit note dated in previous financial year but reported in subsequent financial years return. It can also include amendment made decreasing the turnover through GSTR-1 as well.
4. Workings for reporting done in GSTR 9 of FY 2021-22 must match with the corresponding workings & reporting made in Part V of GSTR 9 for FY 2020-21.

Conclusion:

Many taxpayers have been receiving auto-generated system-based notices from the department on account of non-matching of the values of turnover between GSTR 1, GSTR 3B, GSTR 9, GSTR 9C which raises a cause of concern. Hence, it is very important to have proper verification mechanism in place to have a maker-checker concept while disclosing details in various forms and returns most importantly in GSTR 9 & 9C. Further, the exercise of filing Annual Returns must not be restricted to only number crunching and entering the values in various fields of each table but instead it must be considered as an opportunity to verify the tax positions taken, process improvement, records & accounts maintained and many more which would eventually help in adopting feasible tax structuring and to avoid future litigation.

Views expressed are strictly personal and cannot be considered as a legal opinion in case of any query. For feedback or queries email us at mahadev@hiregange.com ravikumar@hiregange.com or yash@hiregange.com.