CoralMetrix

Issue 03

14 March, 2025

NEWSLETTER

In this newsletter you can expect:

Crack the Code

Procedure for filing application under Amnesty Scheme under GST:

The Amnesty Scheme was introduced through Section 128A of the Central Goods and Services Tax Act, 2017 as part of the Finance Act (No. 2), 2024. The scheme allows for a conditional waiver of interest and/or penalties relating to notices for the years 2017-18,2018-19 and 2019-20.

Additionally, the procedure for availing of these waiver benefits was prescribed by the Central Government on October 8, 2024, through the insertion of Rule 164 in the Central Goods and Services Tax Rules, 2017, and subsequently a clarification was introduced through Circular No. 238/32/2024, dated October 15, 2024. In this article let us understand the procedure for submission of online application. As the timeline for payment of taxes is 31st March 2025, it is important to understand the steps involved therein.

Below are the relevant forms that are to be filed separately for relevant notices and orders:

SPL-01	SCN issued u/s 73(1)
	Statement u/s 73(3)
SPL-02	Order in Original under Section 73(9)
	Revision Order under Section 108(1)
	Order in Appeal under Section 107(11)
	Order re-determining the tax liability under Section 73

Below Steps can be followed for seamless filing:
Step 1: Click "**CREATE APPLICATION**" in the portal the below questions appear.

S.No	Question	Impact
	Whether the demand order is issued through GST portal?	• If DRC 01/07/APL 04 is issued through GST portal, 'Yes' has to be selected. In case the demand order is not issued through GST portal i.e. issued manually by the tax department and DRC 01/07/APL 04 is not available in GST portal, the taxpayer will be required to select 'No'.
2	Whether any appeal application filed against the order?	If any appeal application is filed against the DRC 07/APL 04 order before the First Appellate authority or the High Court, then 'Yes' has to be selected
3	Whether any application filed for the withdrawal of appeal?	This question will be shown only if, 'Yes' is selected for Sl. No. 2 • If Yes is selected for Sl. No. 2 and if the taxpayer has filed application for withdrawal of the said appeal filed against the demand order, then 'Yes' has to be selected. If the taxpayer has not filed any application for withdrawal of appeal, then 'No' has to be selected.

4	Whether the appeal or writ petition against the order been withdrawn before the appellate authority, Appellate Tribunal, High Court, or Supreme Court?	• This question will be shown only if, 'Yes' is selected for Sl. No. 3 If any appeal filed against the DRC 07/APL 04 and the same is withdrawn, then 'Yes' has to be selected.
5	Whether the order issued under either Section 73 and/or Section 74	• Select Yes or No (As per the Original demand order)
6	Whether the order covered under Section 75?	• Select Yes or No (As per the Original demand order)
7	Whether the Demand order includes any Erroneous Refund?	• Select Yes or No (As per the Original demand order)

Step 2: After filling up, SPL-02 will appear on the Dashboard

Step 3: Then Details of Demand Order particulars are to be filled up namely the Order Number, Section under which the order is passed, financial year etc.,

Step 4: In Table 3A, the amount of Demand in the order to be specified

Step 5: In Table 3B, The amount pertaining to Ineligible ITC as per Section 16 (4) & subsequently made eligible under Section 16(5) & Section 16(6) which is involved in the notice/order has to be entered manually by the taxpayer. The taxpayer has to enter the amount against IGST/CGST/SGST/Cess. This amount cannot be more than demand amount entered in Table 3A.

Step 6: In Table 4, Amount paid through payment facility against demand order.

For details against payment against demand, the details of payment will get auto populated.

For Payments made through DRC-03," Voluntary" and "Others", the payment details are required to be mapped against the demand.

For Demand orders made through offline mode, against which payment done through DRC-03, the drop down to be selected.

Step 7: Upload the supporting documents up to size of 5MB
with 5 attachments can be done.

Step 8: By affirming to Declaration, and clicking on "File" the process gets completed with DSC or EVC.

CA Sujatha G
Indirect Tax

Vivad Se Vishwas Scheme 2.0: A New Opportunity to Settle Tax Disputes

The Government has introduced *Vivad Se Vishwas Scheme 2.0* in Budget 2024, aimed at resolving income tax disputes under appeal. This scheme will come into effect on *1st October 2024* and provides taxpayers with an opportunity to settle their tax disputes by paying a specified portion of their outstanding dues.

Applicability of the Scheme

The scheme covers disputes and appeals filed by either the taxpayer or the tax authorities, pending as of *22nd July 2024*, before the following forums:

The Supreme Court, High Court, Income Tax Appellate Tribunal, Commissioner/Joint Commissioner (Appeals)

The Dispute Resolution Panel (DRP) or cases where the DRP has issued orders but the final assessment order is awaited

Revision applications filed under Section 264 of the Income-tax Act, 1961

Special Concession: The amount payable will be reduced to *50%* if:
The appeal was filed by tax authorities.

A previous order was in Favor of the taxpayer and has not been reversed by a higher authority.

Forms for Vivad Se Vishwas Scheme 2.0
The government has notified four forms for participation in the scheme:
Form-1: Declaration and Undertaking by the taxpayer (to be submitted electronically)
Form-2: Certificate issued by the Designated Authority

Form-3: Intimation of payment by the taxpayer (to be submitted electronically)

Form-4: Order for Full and Final Settlement issued by the Designated Authority

Key Points to Remember:
Form-1 must be submitted separately for each dispute.

Form-3 must be submitted with proof of withdrawal of appeal.

Filing a declaration does not imply acceptance of tax assessment but only allows dispute resolution under the scheme.

Timelines for Submission

Form	**Deadline**
Form 1	Submit by 31st January 2025 for lower payment rates
Form-2	Issued within 15 days of Form-1 submission
Form-3	Payment to be made within 15 days of receiving Form-2 and submission of Form-3
Form-4	Issued upon submission of Form-3, confirming full settlement

Important Notes:

- If a taxpayer has submitted *Form-1* and the appeal is later resolved by the relevant authority, they remain eligible for the scheme.
- If the deadline for filing an appeal expired before *22nd July 2024* and the taxpayer filed an appeal along with an application for condonation of delay after this date, they **cannot** opt for the scheme.

This scheme provides an excellent opportunity for taxpayers to resolve pending disputes efficiently. Taxpayers should assess their cases and take timely action to benefit from reduced payment obligations.

Payment Structure under the Scheme

Nature of tax arrear	Amount payable on or before 31st January 2025		Amount payable on or after 31st January 2025	
	Appeal filed after 31st January 2020 but on or before 22nd July 2024	Appeal pending at same forum on or before 31st January 2020	Appeal filed after 31st January 2020 but on or before 22nd July 2024	Appeal pending at same forum on or before 31st January 2020
ggregate amount of disputed tax	00% of disputed tax	10% of disputed tax	10% of disputed tax	20% of disputed tax
isputed interest/penalty/fee	5% of disputed interest/penalty/fee	0% of disputed interest/penalty/fee	0% of disputed interest/penalty/fee	5% of disputed interest/penalty/fee

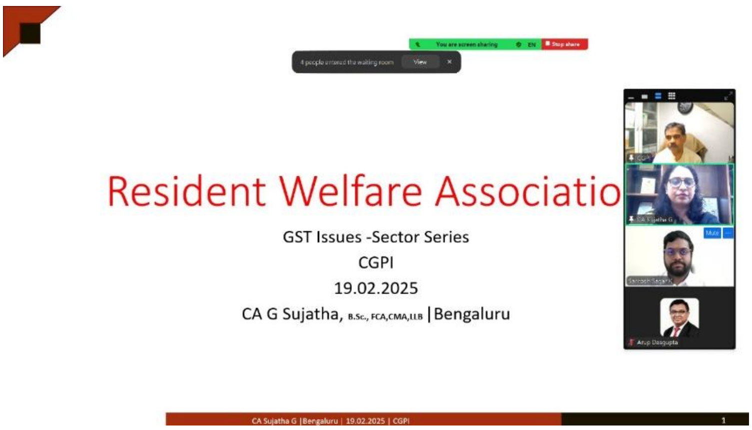
CA Chaitanya Kumar K
Direct Tax

Key Announcements

Budget 2025 Webinar – Key Takeaways!

We successfully hosted our exclusive webinar on **Budget 2025 – GST & Income Tax Updates**, featuring expert insights from **CA Sujatha G, CA Chaitanya Kumar, and Vamsi**. The session provided a deep dive into the **latest tax changes, GST reforms, and TDS updates**.

For those who missed it, **you can watch the full session in our Youtube Channel.**



GST Issues in Resident Welfare Associations

We had an insightful session on **GST Issues – Sector Series focusing on Resident Welfare Associations (RWAs),** conducted by CA G Sujatha in collaboration with CGPI. The session, held on February 19, 2025, shed light on the **key GST implications for RWAs, compliance challenges, and practical solutions.**

Levelling up with Advanced Excel!

Our team members **Pavan and Jeevan** successfully attended the **Advanced Microsoft Excel Workshop - Level 1**, conducted by **KSCAA** at their Rajajinagar office.

With these newfound skills, our team is geared up to enhance productivity and efficiency in data analysis!

Exciting News! Our New Office Opening

We are thrilled to announce the grand opening of our new office as we expand our into **Legal & Advisory Services** under **Raman Law Chambers** & **CoralMetrix Advisory Pvt Ltd**.

Date: 28 March 2025 | Time: 4 Pm Onwards

Location: No.80, 2nd Floor, Chandru Complex, JP Nagar 7th Phase, Bengaluru

Join us for **High Tea & Dinner** as we celebrate this new beginning! Looking forward to welcoming you all.

CoralMetrix

Connect with us

CoralMetrix Advisory
office.coralmetrix@gmail.com
+91 81478 54709
www.coralmetrix.com

Follow us on Social Media