

Overview of Amendments to Schedule III (Division II – Ind AS)

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Overview

Overview

Applicability

- Ministry of Corporate Affairs (MCA) has amended Schedule III of Companies Act 2013 ('the Act') on March 24, 2021. These amendments are effective from **April 01, 2021**.

Purpose

- To provide additional disclosures to various users of financial statements to facilitate in their understanding of operations of the Company

Key considerations

- Amendments to Schedule III are also applicable for presentation and disclosure in corresponding period.
- Management may be required to update their ERP system, processes and controls for preparation, review and disclosures of information in the financial statements as per the revised Schedule III.
- Guidance Note on Schedule III is issued by ICAI contains detailed guidance on these amendments to Schedule III.



Major Amendments impacting classification

Major Amendments impacting classification

Particulars	Existing Classification	Amended Classification	Impact for companies
Current maturities of Long-term borrowing	Disclosed under Other Financial Liabilities (Current)	Separate disclosure of current maturities of Long-term borrowing under “Short-term borrowings”	<ul style="list-style-type: none"> • Companies would need to reclassify current maturities of long-term borrowing classified under current financial liabilities to Short-term borrowings both for current and corresponding reporting period. • Companies can disclose either by way of a note/schedule the total amount of non-current borrowing (including its current maturities) under the respective category of non-current borrowings.
Security Deposit	Security deposit was required to be disclosed under Loans.	Security deposit is now required to be disclosed as separate line item under ‘Other Financial Assets’	<ul style="list-style-type: none"> • Companies would need to reclassify security deposit classified under heading ‘loans’ to a separate line item under ‘Other Financial Assets’ both for current and corresponding reporting period. • Security deposits are generally not in the nature of loans and hence this change in the classification of security deposit reflects its appropriate presentation in the financial statements.
Lease liabilities	No specific requirement under existing schedule III and hence there was diversity in practice in presenting these liabilities in the financial statements.	Long term and current maturities of lease liabilities needs to be classified under non-current and current financial liabilities respectively on the face of the balance sheet.	<ul style="list-style-type: none"> • Companies would need to present Long term and current maturities of lease liabilities needs to be classified under non-current and current financial liabilities respectively on the face of the balance sheet both for current and corresponding reporting period.



Major Amendments impacting Disclosures

Major amendments impacting disclosures

Particulars	Amendments	Guidance																				
Promoter's Shareholdings	<ul style="list-style-type: none"> Disclosure of Shareholding of Promoters and percentage of change during the year to be provided as per the below format : <table border="1" style="margin: 10px auto; width: 80%; border-collapse: collapse;"> <thead> <tr> <th colspan="4">Shares held by promoters at the end of the year</th> <th rowspan="2">% Change during the year</th> </tr> <tr> <th>S. No</th> <th>Promoter name</th> <th>No. of Shares</th> <th>%of total shares</th> </tr> </thead> <tbody> <tr> <td colspan="4">Total</td> <td></td> </tr> </tbody> </table> Promoter here means promoter as defined under section 2(69) of the Act. Details shall be given separately for each class of shares Percentage change shall be computed with respect to the number at the beginning of the year or if issued during the year for the first time then with respect to the date of issue. 	Shares held by promoters at the end of the year				% Change during the year	S. No	Promoter name	No. of Shares	%of total shares	Total					<ul style="list-style-type: none"> Companies needs to ensure consistency of information relating to promoter shareholding as disclosed in the financial statements with : <ol style="list-style-type: none"> a) the details reported in the annual return filed under Section 92 of the Act b) in case of listed entities with the details of shareholding of Promotor and Promotor Group are required to be disclosed under clause 31 of SEBI (Listing Obligation and Disclosure Requirements) Regulations. 						
Shares held by promoters at the end of the year				% Change during the year																		
S. No	Promoter name	No. of Shares	%of total shares																			
Total																						
Statement of Changes in Equity (SOCIE)	<ul style="list-style-type: none"> Under SOCIE, changes in the equity share capital due to prior period errors or restatement of balance at the beginning of current reporting period needs to be disclosed in following format : <p style="margin-left: 20px;">A. Equity Share Capital</p> <p style="margin-left: 20px;">(1) Current reporting period</p> <table border="1" style="margin-left: 20px; width: 80%; border-collapse: collapse;"> <thead> <tr> <th>Balance at the beginning of the current reporting period</th> <th>Changes in Equity Share Capital due to prior period errors</th> <th>Restated balance at the beginning of the current reporting period</th> <th>Changes in equity share capital during the current year</th> <th>Balance at the end of the current reporting period</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> <p style="margin-left: 20px;">(2) Previous reporting period</p> <table border="1" style="margin-left: 20px; width: 80%; border-collapse: collapse;"> <thead> <tr> <th>Balance at the beginning of the previous reporting period</th> <th>Changes in Equity Share Capital due to prior period errors</th> <th>Restated balance at the beginning of the previous reporting period</th> <th>Changes in equity share capital during the previous year</th> <th>Balance at the end of the previous reporting period</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> 	Balance at the beginning of the current reporting period	Changes in Equity Share Capital due to prior period errors	Restated balance at the beginning of the current reporting period	Changes in equity share capital during the current year	Balance at the end of the current reporting period						Balance at the beginning of the previous reporting period	Changes in Equity Share Capital due to prior period errors	Restated balance at the beginning of the previous reporting period	Changes in equity share capital during the previous year	Balance at the end of the previous reporting period						<ul style="list-style-type: none"> This amendment has made the disclosure as per Schedule III consistent with that required to be made under Ind AS 8 – 'Accounting policies, Changes in Accounting Estimates and errors' in the event of prior period errors noted in the financial statements.
Balance at the beginning of the current reporting period	Changes in Equity Share Capital due to prior period errors	Restated balance at the beginning of the current reporting period	Changes in equity share capital during the current year	Balance at the end of the current reporting period																		
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Major amendments impacting disclosures

Particulars	Amendments	Additional considerations																						
Capital work in progress (CWIP)/ Intangible assets under development (IAUD)/Investment property under development (IPUD)	<ul style="list-style-type: none"> Ageing Schedule for Projects in progress and Projects temporarily suspended to be provided in below format : (Amount in Rs.) <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th rowspan="2">CWIP</th> <th colspan="4">Amount in CWIP for a period of</th> <th rowspan="2">Total*</th> </tr> <tr> <th>Less than 1 year</th> <th>1-2 years</th> <th>2-3 years</th> <th>More than 3 years</th> </tr> </thead> <tbody> <tr> <td>Projects in progress</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Projects temporarily suspended</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>*Total shall tally with CWIP amount in the balance sheet.</p> <ul style="list-style-type: none"> Classification of projects in progress or Projects temporarily suspended to be evaluated as at each reporting date. Any change in status during the reporting period or any time after end of the reporting period will not change the classification of assets/projects for above disclosure purposes. When temporary suspension is a necessary part of the process of getting an asset ready for its intended use, the project should not be considered to have been temporarily suspended. 	CWIP	Amount in CWIP for a period of				Total*	Less than 1 year	1-2 years	2-3 years	More than 3 years	Projects in progress						Projects temporarily suspended						<ul style="list-style-type: none"> Companies may need to implement processes and controls for review of ageing of CWIP/IAUD/IPUD, identify and review the projects which are temporarily suspended Updation may be required in the ERP system to generate ageing schedule of CWIP/IAUD/IPUD and maintain details of ongoing, suspended projects, Management needs to perform detailed assessment of aged/suspended CWIP/IAUD/IPUD projects to assess for impairment of such CWIP/IAUD/IPUD balances.
CWIP	Amount in CWIP for a period of				Total*																			
	Less than 1 year	1-2 years	2-3 years	More than 3 years																				
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Capital work in progress (CWIP)/ Intangible assets under development (IAUD)	<ul style="list-style-type: none"> In case of CWIP/ IAUD project whose completion is overdue or its cost has increased compared to its original plan, completion schedule of such projects to be disclosed in the following format : <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th rowspan="2">CWIP</th> <th colspan="4">To be completed in</th> </tr> <tr> <th>Less than 1 year</th> <th>1-2 years</th> <th>2-3 years</th> <th>More than 3 years</th> </tr> </thead> <tbody> <tr> <td style="text-align: left;">Projects in progress Project 1 Project 2</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td style="text-align: left;">Projects temporarily suspended Project 1 Project 2</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <ul style="list-style-type: none"> This disclosure is required to be made at project level and separately for the two categories viz., 'Projects in progress' and 'Projects temporarily suspended'. Variation between project's actual completion timeline or it's actual cost and the respective estimate is required to be evaluated from the original plan (i.e. original completion timelines and original estimated costs). Disclosure is required only in those cases where the actual cost/actual timelines for completion of project has already exceeded the estimated cost/estimated timelines as per original plan. 	CWIP	To be completed in				Less than 1 year	1-2 years	2-3 years	More than 3 years	Projects in progress Project 1 Project 2					Projects temporarily suspended Project 1 Project 2					<ul style="list-style-type: none"> This is significant disclosure requirement particularly for companies with large number of capital projects in progress. Companies may need to implement processes and controls (including updates to ERP) for identification and review of projects which involves time/cost overruns, reasons for such overrun and appropriately estimating the completion schedule based on information received from capital projects department for each reporting period. This disclosure is expected to provide useful insights to various stakeholders like lenders, investors, analysts, etc., on the financial and operational status of various capital projects of the Company.
CWIP	To be completed in																				
	Less than 1 year	1-2 years	2-3 years	More than 3 years																	
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<p>Title deeds of immovable property (other than properties where the Company is the lessee and the lease agreements are duly executed in favor of the lessee)</p>	<ul style="list-style-type: none"> Details of all the immovable properties whose title deeds are not held in the name of the company to be disclosed in the following format : <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">Relevant line item in the Balance sheet</th> <th style="width: 15%;">Description of item of property</th> <th style="width: 10%;">Gross carrying value</th> <th style="width: 10%;">Title deeds held in the name of</th> <th style="width: 15%;">Whether title deed holder is a promoter, director or relative# of promoter*/director or employee of promoter/director</th> <th style="width: 10%;">Property held since which date</th> <th style="width: 25%;">Reason for not being held in the name of the company**</th> </tr> </thead> <tbody> <tr> <td>PPE -</td> <td>Land Building</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td rowspan="4" style="vertical-align: top;">**also indicate if in dispute</td> </tr> <tr> <td>Investment property -</td> <td>Land Building</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>PPE retired from active use and held for disposal -</td> <td>Land Building</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>others</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>#Relative here means relative as defined in the Companies Act, 2013. *Promoter here means promoter as defined in the Companies Act, 2013.</p> <ul style="list-style-type: none"> The above disclosure would include PPE, Investment properties and non-current assets held for sale but excludes Immovable properties classified as inventories. Lease arrangements for immovable properties which are not duly executed in favour of lessee are also required to be disclosed. In case of Immovable property jointly held with others, details are required to be given to the extent of the company's share. 	Relevant line item in the Balance sheet	Description of item of property	Gross carrying value	Title deeds held in the name of	Whether title deed holder is a promoter, director or relative# of promoter*/director or employee of promoter/director	Property held since which date	Reason for not being held in the name of the company**	PPE -	Land Building	-	-	-	-	**also indicate if in dispute	Investment property -	Land Building					PPE retired from active use and held for disposal -	Land Building					others						<ul style="list-style-type: none"> Compiling information relating to title deeds of immovable properties in case of companies with large portfolio of immovable properties acquired over long period of time might pose a challenge. Transfer of immovable properties on amalgamation /merger/conversion of entities requires detailed evaluation. Companies may need to implement processes and controls for identification of such immovable properties and maintain repository for such properties and update it on regular basis. Similar reporting requirement also exists under CARO 2020. Accordingly, consistency of reporting under CARO 2020 and financial statements to be ensured.
Relevant line item in the Balance sheet	Description of item of property	Gross carrying value	Title deeds held in the name of	Whether title deed holder is a promoter, director or relative# of promoter*/director or employee of promoter/director	Property held since which date	Reason for not being held in the name of the company**																												
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<p>Property, Plant and Equipment (PPE), Intangible Assets (IA) and Investment property (IP)</p>	<ul style="list-style-type: none"> Where the Company has revalued its PPE or IA, it needs to disclose whether the revaluation is based on the valuation by a registered valuer as defined under rule 2 of Companies (Registered Valuers and Valuation) Rules, 2017. Companies having investment properties are required to determine fair value of such investment properties at the reporting date for disclosure purposes as per Ind AS 40 - 'Investment Property'. Such Companies need to disclose whether the fair value of investment property is based on the valuation by a registered valuer as defined under rule 2 of Companies (Registered Valuers and Valuation) Rules, 2017. In case the Company has not engaged registered valuer for such revaluation/determination of fair value for PPE, IA or IP, such fact needs to be disclosed in the financial statements. In the reconciliation of gross and net carrying amounts at the beginning and at the end of the year, amount of change due to revaluation (if such change is 10% or more of net carrying value for each class) of PPE or IA to be disclosed in addition existing disclosure of change in the carrying value of PPE/IA due to additions, deletion, business combination, etc. 	<ul style="list-style-type: none"> The amendment relating to disclosure of valuation by registered valuers will bring more transparency as Companies are now required to make specific affirmation in the financial statements on whether the fair value of investment property is based on the valuation by registered valuer. While Ind AS Schedule III requires separate disclosure of the amount of change due to revaluation, where change is 10% or more, Ind AS 16 requires reconciliation of the carrying amount at the beginning and end of the period showing increase/decrease resulting from revaluations, irrespective of the percentage change. <p>Accordingly, Companies should continue to disclose the amount of change due to revaluation irrespective whether such a change is 10% or more as per the requirement of Ind AS 116.</p>

Major amendments impacting disclosures

Particulars	Amendments	Additional considerations																																																						
Trade Receivables	<ul style="list-style-type: none"> Additional disclosure for disputed and undisputed trade receivables along with its ageing into various aged buckets needs to be provided as per the below format. <p style="text-align: center;">Trade Receivables ageing schedule</p> <p style="text-align: right;">(Amount in Rs.)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Particulars</th> <th colspan="5">Outstanding for following periods from due date of payment#</th> <th rowspan="2">Total</th> </tr> <tr> <th>Less than 6 months</th> <th>6 months - 1 year</th> <th>1-2 years</th> <th>2-3 years</th> <th>More than 3 years</th> </tr> </thead> <tbody> <tr> <td>(i) Undisputed Trade receivables – considered good</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>(ii) Undisputed Trade Receivables – which have significant increase in credit risk</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>(iii) Undisputed Trade Receivables – credit impaired</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>(iv) Disputed Trade Receivables– considered good</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>(v) Disputed Trade Receivables – which have significant increase in credit risk</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>(vi) Disputed Trade Receivables – credit impaired</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <ul style="list-style-type: none"> The disclosure is required for Trade receivables (disclosed under both current and non-current assets). The ageing of the trade receivables needs to be determined from the due date of the invoice as per the terms agreed between the buyer and seller. In case if the due date is not agreed, then the ageing related disclosure needs to be prepared from the date of transaction. Schedule III also require disclosures for unbilled dues separately. 	Particulars	Outstanding for following periods from due date of payment#					Total	Less than 6 months	6 months - 1 year	1-2 years	2-3 years	More than 3 years	(i) Undisputed Trade receivables – considered good							(ii) Undisputed Trade Receivables – which have significant increase in credit risk							(iii) Undisputed Trade Receivables – credit impaired							(iv) Disputed Trade Receivables– considered good							(v) Disputed Trade Receivables – which have significant increase in credit risk							(vi) Disputed Trade Receivables – credit impaired							<ul style="list-style-type: none"> Companies will need to implement processes and controls (including controls in the ERP system) for reporting information as a part of this disclosure including preparation and review of ageing schedule, bifurcation between disputed and undisputed dues, etc. This will involve collaboration between finance, legal and marketing function of the Company for the purposes of identification and reporting of disputed receivables and its classification based on credit risk assessment. Management needs to perform detailed assessment of outstanding aged and disputed receivable from the perspective of provision for doubtful debts considering detailed disclosures required to be made in the financial statements.
Particulars	Outstanding for following periods from due date of payment#					Total																																																		
	Less than 6 months	6 months - 1 year	1-2 years	2-3 years	More than 3 years																																																			
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Trade Payables	<ul style="list-style-type: none"> Additional disclosure for disputed and undisputed trade payables along with its ageing into various aged buckets needs to be provided as per the below format. <p>Trade Payables ageing schedule</p> <p style="text-align: right;">(Amount in Rs.)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Particulars</th> <th colspan="4">Outstanding for following periods from due date of payment#</th> <th rowspan="2">Total</th> </tr> <tr> <th>Less than 1 year</th> <th>1-2 years</th> <th>2-3 years</th> <th>More than 3 years</th> </tr> </thead> <tbody> <tr> <td>(i)MSME</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>(ii)Others</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>(iii) Disputed dues – MSME</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>(iv) Disputed dues - Others</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <ul style="list-style-type: none"> Where no due date of payment is specified – disclosure shall be from date of transaction Unbilled dues shall be disclosed separately. Unbilled trade payables to include accruals which are not classified as provisions under Ind AS 37. 	Particulars	Outstanding for following periods from due date of payment#				Total	Less than 1 year	1-2 years	2-3 years	More than 3 years	(i)MSME						(ii)Others						(iii) Disputed dues – MSME						(iv) Disputed dues - Others						<ul style="list-style-type: none"> Updation may be required to the processes/controls including the ERP system to generate ageing schedule and bifurcation between MSME, disputed and undisputed dues as per new requirement. Companies needs to identify and evaluate the disputed payables based on information received from procurement and legal department for each reporting period. Companies may also disclose trade payables not due for payment in separate column to reconcile with the trade payables balances in the balance sheet.
Particulars	Outstanding for following periods from due date of payment#				Total																															
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<p>Loans and advances to promoters, directors, KMPs, related parties</p>	<ul style="list-style-type: none"> Disclosures required in the following format for loans/advances in nature of loans granted to promoters, directors, KMPs, related parties, either severally or jointly with any other person, that are (i) repayable on demand or (ii) without specifying any terms or period of repayment. <table border="1" style="margin: 10px auto; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>Type of Borrower</th> <th>Amount of loan or advance in the nature of loan outstanding</th> <th>Percentage to the total Loans and Advances in the nature of loans</th> </tr> </thead> <tbody> <tr> <td>Promoters</td> <td></td> <td></td> </tr> <tr> <td>Directors</td> <td></td> <td></td> </tr> <tr> <td>KMPs</td> <td></td> <td></td> </tr> <tr> <td>Related Parties</td> <td></td> <td></td> </tr> </tbody> </table> <ul style="list-style-type: none"> Relationship should be considered on the date of loan and the amount should be outstanding as at the balance sheet date for the purposes of above disclosures. 	Type of Borrower	Amount of loan or advance in the nature of loan outstanding	Percentage to the total Loans and Advances in the nature of loans	Promoters			Directors			KMPs			Related Parties			<ul style="list-style-type: none"> Management to ensure compliance with section 186 of the Act and consistency of this disclosure with the related party disclosure in the financial statements as per Ind AS 24. Advance in nature of loan would include advance given for an amount which is far in excess of the value of an order or for a period which is far in excess of the period for which such advances are usually extended as per the normal trade practice. Similar reporting requirement also exists under CARO 2020
Type of Borrower	Amount of loan or advance in the nature of loan outstanding	Percentage to the total Loans and Advances in the nature of loans															
Promoters																	
Directors																	
KMPs																	
Related Parties																	

Major amendments impacting disclosures

Particulars	Amendments	Additional considerations
<p>Utilisation of Borrowed funds and share premium</p>	<p>(A) Where company has <u>advanced or loaned or invested funds</u> to any other person(s) or entity(ies), including foreign entities (Intermediaries) with the understanding (whether recorded in writing or otherwise) that the Intermediary shall</p> <p>(i) directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the company (Ultimate Beneficiaries) or</p> <p>(ii) provide any guarantee, security or the like to or on behalf of the Ultimate Beneficiaries</p> <p>The company shall disclose the following:</p> <ul style="list-style-type: none"> • date and amount of fund advanced or loaned or invested in Intermediaries with complete details of each Intermediary. • date and amount of fund further advanced or loaned or invested by such Intermediaries to other intermediaries or Ultimate Beneficiaries along with complete details of the ultimate beneficiaries. • date and amount of guarantee, security or the like provided to or on behalf of the Ultimate Beneficiaries • declaration that relevant provisions of the Foreign Exchange Management Act, 1999 and Companies Act, 2013 has been complied with for such transactions and the transactions are not violative of the Prevention of Money-Laundering Act, 2002 	<ul style="list-style-type: none"> • The objective of this disclosure requirement is to have more transparent disclosures for complex loans/investment/funding structures which are not executed directly between the Company and the ultimate beneficiary to conceal the identity of ultimate beneficiary. • The term ‘with the understanding (whether recorded in writing or otherwise)’ shall be construed basis appropriate evidences like board/shareholder resolutions, investment/ share purchase agreements, term sheets, etc. or through the objective / understanding of the overall transaction / flow of funds. • There is no exemption for holding subsidiary relationship for reporting under this requirement. Thus, if a loan is given from parent to subsidiary to further advance to step down subsidiary, it would require disclosure.
	<p>For the purpose of this disclosure, the term ‘complete details’ would mean that details of each party / entity should include the name, registered address, any government identification number (for e.g., PAN, CIN, etc.) and relationship with the company making the disclosure.</p>	

Major amendments impacting disclosures

Particulars	Amendments	Additional considerations
<p>Utilisation of Borrowed funds and share premium</p>	<p>(B) Where a company has <u>received any fund</u> from any person(s) or entity(ies), including foreign entities (funding Party) with the understanding (whether recorded in writing or otherwise) that the company shall</p> <p>(i) directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the funding Party (Ultimate Beneficiaries) or</p> <p>(ii) provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries</p> <p>The company shall disclose the following:</p> <ul style="list-style-type: none"> • date and amount of fund received from funding parties with complete details of each funding party. • date and amount of fund further advanced or loaned or invested other intermediaries or Ultimate Beneficiaries along with complete details of the other intermediaries' or ultimate beneficiaries. • date and amount of guarantee, security or the like provided to or on behalf of the Ultimate Beneficiaries • declaration that relevant provisions of the Foreign Exchange Management Act, 1999 and Companies Act has been complied with for such transactions and the transactions are not violative of the Prevention of Money-Laundering act, 2002 	<p>Same consideration as stated for section (A) above would be applicable for this requirement.</p>

Major amendments impacting disclosures

Particulars	Amendments	Additional considerations
<p>Borrowings obtained on the basis of security of current assets</p>	<ul style="list-style-type: none"> • In case of Companies having borrowings from banks or financial institutions obtained on the basis of security of current assets, the following needs to be disclosed: <ul style="list-style-type: none"> - whether quarterly returns/ statement of current assets filed by the Company with banks or financial institutions is in agreement with books of account and - if not, summary of reconciliation and reasons of material discrepancies, (if any) to be adequately disclosed. • Disclosure requirement shall apply if the company has borrowings 'during any point of time of the year' from banks or financial institutions on the basis of security of current assets. 	<ul style="list-style-type: none"> • The disclosure required under this clause should also be made where borrowings have been availed based on security of current assets of other companies/entities within the same Group as the reporting entity. • The Company shall provide this disclosure considering the sanctioned borrowings even if the same is unutilized during the period or as at the end of the reporting period. • Although company may be submitting monthly returns/statements to the lenders, reporting under this clause is required for the quarterly returns/statement. • Management needs to implement control for periodic reconciliation of information submitted in the return/statements in the books of accounts for all the borrowings from banks and financial institutions. • Similar reporting requirement also exists under CARO 2020

Major amendments impacting disclosures

Particulars	Amendments	Additional considerations
Wilful Defaulter	<ul style="list-style-type: none"> • Where the company is declared wilful defaulter by Bank/ Financial Institution/ other lenders, it shall disclose the following information : <ul style="list-style-type: none"> – Date of declaration as wilful defaulter – Amount and nature of defaults • “wilful defaulter” here means a person or an issuer who or which is categorized as a wilful defaulter by any bank or financial institution or consortium thereof, in accordance with the guidelines on wilful defaulters issued by the Reserve Bank of India 	<ul style="list-style-type: none"> • Company declared as wilful defaulter at any time during the year or till the date of approval of the financial statements or in the previous period and the default has continued in the current year covered under this disclosure. • Similar reporting requirement also exists under CARO 2020.
Compliance with number of layers of companies	<p>Where the company has not complied with number of layers of companies prescribed under Section 2 (87) of the Act read with Companies (Restriction on number of Layers) Rules, 2017, the following information needs to be disclosed in the financial statements :</p> <ul style="list-style-type: none"> • the name and CIN of the companies beyond the specified layers and • the relationship/extent of holding of the company in such downstream companies. 	<ul style="list-style-type: none"> • While there is no change in the compliance requirements under this Companies Act 2013, specific disclosure in case of non-compliance is now required to be included in the financial statements under Schedule III.

Major amendments impacting disclosures

Particulars	Amendments	Additional considerations																								
Relationship with Struck off Companies	<p>Where the company has any transactions with companies struck off under Companies Act, the Company shall disclose the following details:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Name of struck off Company</th> <th style="width: 30%;">Nature of transactions with struck-off Company</th> <th style="width: 15%;">Balance outstanding</th> <th style="width: 35%;">Relationship with the Struck off company, if any, to be disclosed</th> </tr> </thead> <tbody> <tr> <td></td> <td>Investments in securities</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Receivables</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Payables</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Shares held by struck off company</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Other outstanding balances (to be specified)</td> <td></td> <td></td> </tr> </tbody> </table> <ul style="list-style-type: none"> The above disclosure is not required in case of companies whose names were struck off during the financial year, but an order had been passed by any adjudicating authority (for e.g., NCLT) restoring the company's name before approval of the financial statements. 	Name of struck off Company	Nature of transactions with struck-off Company	Balance outstanding	Relationship with the Struck off company, if any, to be disclosed		Investments in securities				Receivables				Payables				Shares held by struck off company				Other outstanding balances (to be specified)			<ul style="list-style-type: none"> Companies need to implement processes and controls (including controls in ERP system) for identification of such struck-off companies, nature of transaction and relationship with the company for the purposes of disclosure in the financial statements as per the prescribed format. The names of the Companies whose names have been struck-off are available on the MCA websites and companies may consider referring to MCA websites for such details. In case of any balances outstanding with struck-off companies, management need to evaluate the recoverability of those balances and create provisions, if any, required to be made.
Name of struck off Company	Nature of transactions with struck-off Company	Balance outstanding	Relationship with the Struck off company, if any, to be disclosed																							
	Investments in securities																									
	Receivables																									
	Payables																									
	Shares held by struck off company																									
	Other outstanding balances (to be specified)																									

Major amendments impacting disclosures

Particulars	Amendments	Additional considerations
Registration/satisfaction of charges with Registrar of Companies	<ul style="list-style-type: none"> • Whether any charges or satisfaction is pending to be registered with ROC beyond the statutory period? • Disclose details of such charge & reasons for the delay. 	<ul style="list-style-type: none"> • This disclosure has been inserted to emphasis timely compliance on filing with registrar for creation or satisfaction of charge.
Disclosure of Ratios	<ul style="list-style-type: none"> • Company is required to disclose following ratios in its financial statements. <ul style="list-style-type: none"> (a) Current Ratio (b) Debt-Equity Ratio (c) Debt Service Coverage Ratio (d) Return on Equity Ratio (e) Inventory turnover ratio (f) Trade Receivables turnover ratio (g) Trade payables turnover ratio (h) Net capital turnover ratio <ul style="list-style-type: none"> (i) Net profit ratio (j) Return on Capital employed (k) Return on investment • Company shall explain items included in numerator and denominator for computing above ratios. • Explanations/reasons for changes in any of the above ratios by more than 25% as compared to last year to be provided in the financial statements. 	<ul style="list-style-type: none"> • This disclosure will provide lenders and other stakeholders with various analytical ratios for the Company and thereby providing insights into the operations of the Company. • Definition of each the ratios is provided in Annexure B to the Guidance Note on Schedule III. • Management needs to ensure consistency in computation and disclosure of these ratios in the financial statements with those disclosed in Annual report, SEBI results, etc. • The Company should implement processes and controls (including controls in the ERP system) for the calculation of these ratios.

Major amendments impacting disclosures

Particulars	Amendments	Additional considerations
Benami Property disclosure	<ul style="list-style-type: none"> Whether any proceedings have been initiated or pending against the company for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 and the rules made thereunder. The company shall disclose a) details of such property and year of acquisition, b) Amount involved c) details of beneficiaries and relationship with the Company d) reference of property in the balance sheet, e) nature of proceedings, status and the company's view on the same, etc. 	<ul style="list-style-type: none"> In case of such proceedings, the Company must assess whether any disclosure is required for contingent liability or provision is required in books of account due to such proceedings against the company.
CSR Expenditure	<p>The following disclosures are required to made in the financial statements with regard to CSR activities:</p> <ul style="list-style-type: none"> (a) amount required to be spent by the company during the year (b) amount of expenditure incurred (c) shortfall at the end of the years (d) total of previous years shortfall (e) reason for shortfall (f) nature of CSR activities (g) details of related party transactions (contribution to a trust controlled by the company) (h) where a provision is made with respect to a liability incurred by entering into a contractual obligation, the movements in the provision during the year should be shown separately. 	<ul style="list-style-type: none"> The amendment signifies the focus that regulators have on the area of CSR. The expectations is to track CSR spends and disclose the same in the financial statements. Additional disclosure requirements (like details of on-going projects, other than ongoing projects, etc.) specified Section 135 of the Act needs to be complied in addition to Schedule III disclosures.

Major amendments impacting disclosures

Particulars	Amendments	Additional considerations
<p>Undisclosed income</p>	<p>(a) Company to disclose details of any transaction not recorded in the books of accounts <u>that has been surrendered or disclosed as undisclosed income during the year</u> in the tax assessments under the Income Tax Act, 1961 unless there is immunity for disclosure under any scheme and</p> <p>(b) State whether the previously unrecorded income and related assets have been properly recorded in the books of account during the year.</p> <ul style="list-style-type: none"> • Details required to be disclosed includes a) Description of transaction along with value treated as Income b) Assessment year c) Section of the Act d) amount disclosed in tax return, e) Assessment status f) Whether transactions recorded in the books of accounts g) financial year in which the transaction is recorded. 	<ul style="list-style-type: none"> • This disclosure is required in all cases of surrendered/disclosed income unless there is any immunity for disclosure under any Scheme. • This disclosure is applicable in cases where company have voluntarily admitted to the addition of such income, which can be demonstrated on the basis of the returns filed by the company where such income is disclosed. • Addition made by the income tax authorities which are disputed by the Company are not required to be disclosed under this clause. • Accounting implications under Ind AS 8 on “ Accounting policies, Changes in Accounting Estimates and Errors” to be evaluated for such undisclosed transactions. • Evaluate the impact of income surrendered/disclosed on internal financial controls, nature and extent of audit procedures, audit report and disclosure in the financial statements.



Other Amendments

Other amendments

Particulars	Amendments
Compliance with approved Scheme of Arrangements	<ul style="list-style-type: none">• Where any Scheme of Arrangements has been approved by the Competent Authority in terms of sections 230 to 237 of the Companies Act, 2013, the company shall disclose that the effect of such Scheme of Arrangements have been accounted for in the books of account of the Company in accordance with the Scheme and accounting standards. In case of any deviation, company needs to provide appropriate explanations.• This requirement shall be applicable for schemes that have been approved earlier and have an ongoing accounting impact as on the date of current or comparative period financial statements where such requirements are applied.
Details of Crypto Currency or Virtual Currency	<p>Where the Company has traded or invested in Crypto currency or Virtual Currency during the financial year, the following shall be disclosed :</p> <ul style="list-style-type: none">• profit or loss on transactions involving Crypto currency or Virtual Currency• amount of currency held as at the reporting date• deposits or advances from any person for the purpose of trading or investing in Crypto Currency/ virtual currency.
Utilisation of borrowings	<ul style="list-style-type: none">• Where the company has not used the borrowings from banks and financial institutions for the specific purpose for which it was taken at the balance sheet date, the company shall disclose the details of where they have been used.• Utilisation of borrowings needs to be determined based on overall position of balance sheet at the reporting period. It is not necessary to establish a one-to-one relationship with the amount of borrowing and its utilisation.

Thank you
