

Corporate Law & Other Related Laws

October 2025

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The Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Amendment Rules ,2025.

The Ministry of Corporate Affairs (MCA) vide its notification has notified “the Investor education and protection fund authority (Accounting, Audit, Transfer and Refund) Amendment Rules, 2025. These rules shall come into force from 6th October 2025. The amendments provide:

- 1.The Substitution of Form IEPF-5(Application to the Authority for Claiming unpaid amounts and shares out of Investor Education and Protection Fund”).
- 2.The revised Form IEPF-5 now includes additional requirements such as:
 - Confirmation whether an entitlement letter has been issued by the company/bank.
 - If filing by an authorised representative (consultant), an authority letter must now be attached.
 - More detailed particulars of the claim (shares, amounts, reasons for non-receipt, etc.)

Relaxation on levy of Additional fees for filing e-form DIR-3 KYC and web-form DIR 3KYC-WEB

The Ministry of Corporate Affairs (MCA) had earlier extended the Directors KYC date to 15.10.2025 vide notification dated 29.09. 2025.It has further provided relaxation from the payment of additional fees in filing of e-form DIR-3KYC and web-form DIR-3KYC-Web through general circular no. 05/2025, dated 15.10.2025, thereby allowing the filing of e-from DIR-3KYC and web form DIR-3KYC-WEB without late fees up to 31st October 2025.

Relaxation of additional fees and extension of time for filing of Financial Statements and Annual Returns for the FY 2024-25

In light of the deployment of Annual forms on the V3 Portal, the Ministry of Corporate Affairs (MCA) has announced a significant relief for companies under the Companies Act, 2013. As per General Circular No. 06/2025 dated 17th October 2025, the deadline for filing Annual Financial Statements and Annual Returns for the financial year 2024–25 has been extended from 29th October 2025 to 31st December 2025.

The Companies are now permitted to file their Annual Financial Statements (e-forms AOC-4, AOC-CFS, AOC-4 NBFC (Ind AS), AOC-4 CFS NBFC (Ind AS), AOC-(XBRL) and Annual Return (e-forms MGT-7, MGT-7A) for the financial year 2024-25 on the MCA-21 Version 3 portal without being charged additional /late fees, up to 31st December 2025.

Relaxation of additional fees in filing of CRA-4 (Cost Audit Report in XBRL format) for the Financial Year ended on 31.03.2025

The Ministry of Corporate Affairs (MCA) has announced a significant relief for companies under the Companies Act, 2013. As per General Circular No. 07/2025 dated 27th October 2025, Companies can now file CRA-4 (Cost Audit Report in XBRL format) up to 31st December 2025 without payment of additional fees.

Filings made after 31st December 2025 will attract all applicable additional/late fees from the original due date.

The extension is provided due to technical challenges faced during transition to the MCA V3 portal.



An Adjudication order for Non-Compliance with the provisions of Section 118(11) of the Companies Act, 2013, for failure to maintain proper minutes of meeting.

The Ministry of Corporate Affairs vide its Gazette notification number S.O. 831(E) dated 24/03/2015 appointed undersigned as Adjudicating Officer in exercise of the powers conferred by section 454 of the Companies Act, 2013 [herein after known as Act] read with Companies (Adjudication of Penalties) Rules, 2014 for adjudging penalties under the provisions of this Act.

Provisions of the Act: (11) If any default is made in complying with the provisions of this section in respect of any meeting, the company shall be liable to a penalty of twenty-five thousand rupees and every officer of the company who is in default shall be liable to a penalty of five thousand rupees.

ROSMERTA AUTOTECH LIMITED (CIN: U74899DL1987PLC027962) the default found to be committed U/S 118 of Companies Act, 2013 r/w SS-1 and SS-2 based on inspection conducted in the matter of subject Company wherein following observations was raised in para 24 of preliminary findings letter issued to the company during inspection:

(i) The minutes of the board meetings were maintained without serially numbered for period of FY 2015-16; non-compliance observed for period of FY 2015-16.

Whereas in response to the E-SCN (SCN/ADJ/04-2025/DL/01072) issued on 07/05/2025, replies were received on 22.05.2025 and 08.10.2025 wherein the company and the officer-in-default accepted the non-compliance and stated that the default occurred due to an inadvertent oversight and that the default

has been rectified. Further, in their reply they have mentioned that Mr. Akhil Gupta has been appointed as director on 30th September 2024 (i.e., post occurrence of the default), hence he is not officer in default in this matter. Hence, the penalty would be imposed on Company and its directors in default as per the provisions of Section 118(11) of the Companies Act, 2013.

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) (Fourth Amendment) Regulations, 2025.

The Securities and Exchange Board of India (SEBI) vide its notification No. SEBI/LAD-NRO/GN/2025/270 dated October 22, 2025, has notified "the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) (Fourth Amendment) Regulations, 2025" which shall come into force on the date of their publication in the Official Gazette. According to the amendment, in regulation 56, in the existing sub regulation (1), the words "shall forward the following to the debenture trustee promptly" shall be substituted with the words and symbols, "shall, as soon as possible, and in any case not later than twenty-four hours from the occurrence of the event or receipt of information, unless otherwise specified, forward the following to the debenture trustee."



An Adjudication order for non-compliance with the provisions relating to the Board’s Report and Financial Statements under Section 134(8) of the Companies Act.

The Ministry of Corporate Affairs vide its Gazette notification number S.O. 831(E)dated 24/03/2015 appointed undersigned as Adjudicating Officer in exercise of the powers conferred by section 454 of the Companies Act, 2013 [herein after known as Act] read with Companies (Adjudication of Penalties) Rules, 2014 for adjudging penalties under the provisions of this Act.

(8) If a company is in default in complying with the provisions of this section, the company shall be liable to a penalty of three lakh rupees and every officer of the company who is in default shall be liable to a penalty of fifty thousand rupees.

REWARD360 GLOBAL SERVICES PRIVATE LIMITED (CIN U74900KA2012PTC067399) the default found to be committed under Section 134(1) and 134(3) of the Act by its Board of Directors for failure to provide disclosures in the Board Report for the Financial Years 2018-2019. The company has filed an adjudication application on 27.09.2024 for violation of the provisions of section 134 of the Act by its Board of directors for failure to provide certain disclosures in the Board report for the financial years 2018-19, 2019-20 and 2020-21, including those related to the consolidated financials of the company. The reasons cited were multifarious including the then prevalent COVID situation. Pursuant to the adjudication application filed by the company, show

cause notice dated 19.02.2025 was sent to the company and its officers in default through e-Adjudication module, and was also sent through speed post on 28.02.2025. The company and Officers in default have submitted their reply dated 14.03.2025 on e-Adjudication portal stating that the violation was unintentional, and the company is otherwise a compliant company. They submit that this application has been filed Suo-motu by them. Subsequently, e-hearing notice dated 23.06.2025 was sent to the company and its officers in default through e-Adjudication module. E-Hearing was scheduled on 24.06.2025 which was attended by Mr. Naman G Joshi, practicing company secretary and authorized representative of company and officers in default who made the submissions as per the adjudication application filed and reiterated the same. It is seen from records that the company does not fall under the definition of small company as per the provisions of section 2(85) of the Companies Act, 2013. Therefore, the provision of imposing lesser penalty as per the section 446B of the Act shall not be applicable in the case. This violation is being adjudicated for the 3 financial years viz. 2018-19, 2019-20 and 2020-21 on this day through the adjudication order. However, in the e-Adjudication Module, this Order pertains to the FY 2018-19, and other financial years are dealt with in separate Orders.



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