## N. J. JAIN & ASSOCIATES

CHARTERED ACCOUNTANTS

#### GST Alert 14/2018-19 Date 28.02.2019

#### Maintenance of Accounts, Records and Documents under GST

Every person registered under the GST Act is required to maintain certain books of accounts, records and documents. Synopsis of these requirement as enumerated in the law is given below in a FAQ format:

#### 1. Which records and documents are required to be maintained by a registered person?

- a. Details of Production or manufacture of goods
- b. Inward and outward supply of goods or services or both
- c. Separate account of advances received, paid and adjustments made thereto.
- d. Stock of goods
- e. Quantitative details of raw materials or services used in the manufacture and quantitative details of the goods so manufactured including the waste and by products thereof.
- f. Tax Invoices, bills of supply, delivery challans, credit notes, debit notes, receipt vouchers, payment vouchers and refund vouchers
- g. Proof of receipt and despatch of goods like Lorry Receipts (LR), Goods Received Note (GRN), E-Way bills etc
- h. Input tax credit availed, Output tax payable and paid.
- i. Names and complete addresses of his suppliers and customers.
- j. Goods or services imported or exported or of supplies attracting payment of tax on reverse charge.
- k. Quantitative details of goods used in the provision of services, details of input services utilized and the services supplied.
- I. The complete address of the premises where goods are stored by him.

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### 2. Are there any special requirements in terms of maintenance of records for a Works Contract Service provider other than the details listed above?

Registered person executing works contract Services is required to keep separate accounts for the work contract showing:

- The names and addresses of the persons on whose behalf the works contract is executed;
- Description, value and quantity (wherever applicable) of goods or services received for the execution of works contract;
- Description, value and quantity (wherever applicable) of goods or services utilized in the execution of works contract;
- Details of payment received in respect of each works contract; and
- The names and addresses of suppliers from whom he received goods or services.

# 3. What are the additional records required to be maintained by every owner / operator of godown or warehouse and transporters?

- Any person engaged in the business of transporting goods shall maintain records of goods transported, delivered and goods stored in transit by him along with the GST Number of the registered consigner and consignee for each of his branches.
- Every owner or operator of a warehouse or godown shall maintain books of accounts with respect to the period for which particular goods remain in the warehouse, including the particulars relating to dispatch, movement, receipt and disposal of such goods.
- The owner or the operator of the godown shall store the goods in such manner that they
  can be identified item-wise and owner-wise and shall facilitate any physical verification or
  inspection by the proper officer on demand.

#### 4. What are the additional records required to be maintained by the agent?

 Particulars of authorisation received by him from each principal to receive or supply goods or services on behalf of such principal separately;

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- Particulars including description, value and quantity (wherever applicable) of goods or services received / supplied on behalf of every principal;
- Details of accounts furnished to every principal and
- Tax paid on receipts or on supply of goods or services effected on behalf of every principal.

#### 5. Where are the records and documents required to be stored?

A registered person is supposed to maintain all the records and documents at his principal place of business as registered under the GST Act. In cases where a person has additional places of businesses specified in the certificate of registration, accounts and records relating to each such place of business shall be kept at such places of business. For example, as per GST registration certificate if a person is having principal place of business in Ahmedabad and additional place of business in Surat, then records pertaining to Ahmedabad are required to be stored in Ahmedabad and those pertaining to Surat can be stored at Surat itself. In case records are too voluminous in nature then the same can be stored in a storage facility away from the place of the business under intimation to the jurisdictional officer, such storage facility must also be registered as an additional place of business.

#### 6. What is the time period for which records are to be maintained?

- Registered Person is required to retain records and documents for 72 months (6 years) from the expiry of Annual Return due date.
- Records for June 17 to March 18, will be required to be maintained till 30<sup>th</sup> June 2025 as due date of annual return for the said period is 30.06.2019. Similarly records for FY 2018-19 will be required to be maintained till December 2025. It can be seen that records for a financial year are required to be maintained for an average of 7 more years.
- Further, where the assessee is a party to any appeal before any appellate authority or is under investigation in GST Act, then it shall retain the books of account and other records pertaining to the subject matter of such legal proceedings or investigation for a period of one year after its final disposal of or for the period specified above, whichever is later.

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#### 7. Can the records discussed above be maintained in Electronic / digitised format?

- Records and documents can be maintained either in physical form or in electronic / digitized format and in case the records are maintained electronic / digitized format then they shall be authenticated by means of a digital signature.
- Authentication by means of digital signature is to be done as provided in section 3 of the Information Technology Act, 2000
- Proper electronic back-up of records shall be maintained and preserved as such that the information can be restored within a reasonable period of time in the event of destruction due to any cause.
- Where the records are stored electronically by the company, it shall, on demand by the officials, provide the details of such files, passwords of such files.

Formulated by: N J Jain & Associates Chartered Accountants

CA Nitesh Jain Managing Partner

**CA Praveen Maheshwari** Partner CA Gaurav Khetan Partner

CA Jay Dalwadi Partner

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