CASA

# **CA Social Affiliation**

CASA/Rep/25-26/02

Dated 19th September 2025

To The Hon. Finance Minister of India North Block New Delhi - 110001

Respected Ma'am



Subject:

Request Representation for Extension of Due Date for Furnishing Tax Audit Reports under the Income-tax Act, 1961 and Statutory Audit Reports under the Companies Act, 2013 – FY 2024–25

### Respected Madam,

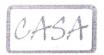
CASA [Chartered Accountants Social Affiliation] is a registered NGO, established in the year 2010 is working effortlessly and continuously for the benefits of the Professionals, Trade & Industry by way of imparting knowledgeable webinars by various experts in Industry. Till date it has successfully organised more than 1500 webinars on various topics including that of various Audits under Income Tax Act, Income Tax Returns, GST, Company Act, & many other technical topics under various other applicable Laws. We, at CASA believes in taking all the requisite steps and actions to ensure smooth & complete tax and other statutory compliances by the stakeholders.

On behalf of CASA, we respectfully submit for your kind consideration a matter of urgent concern impacting both the Chartered Accountant fraternity and taxpayers at large, relating to the statutory timelines for furnishing Tax Audit Reports under Section 44AB of the Income-tax Act, 1961, and Statutory Audit Reports under the Companies Act, 2013, for AY 2025–26 (FY 2024–25)

## Background

- 1. Income-tax Act, 1961
  - As per Section 139(1), the due date for furnishing returns of income in non-audit cases is 31st July of the Assessment Year.

8



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- o The Proviso to Section 139(1) prescribes the due date for audit cases as 30th September of the Assessment Year.
- o Accordingly, there is a **statutory gap of two months**, intended to provide sufficient time for completion of **Tax Audits under Section 44AB**.

### 2. Companies Act, 2013

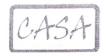
- Section 129: Requires companies to prepare financial statements that give a true and fair view.
- Section 134: Mandates approval of financial statements by the Board of Directors along with the Auditor's Report.
- Section 96: Requires companies to hold their Annual General Meeting (AGM) within six months from the close of the financial year, subject to prescribed limits.

#### 3. Situation for AY 2025-26:

- The due date for non-audit returns was extended by CBDT, first to 15th September 2025 and then to 16th September 2025, owing to delayed release of utilities, frequent portal errors, and system nonfunctionality.
- As a result, professionals are left with only 14 days to complete and upload thousands of Tax Audit Reports, which is practically unfeasible and risks compromising audit quality, reporting accuracy, and professional diligence.
- o Frequent e-filing portal glitches and mismatches in AIS/data reconciliation has compressed the available time for completing statutory audits. Unless statutory audits are finalised and auditor's reports are ready, AGMs cannot be convened. In this constricted scenario, extending the audit timeline is necessary to allow companies to meet their legal obligations properly without compromising audit quality, professional diligence, or corporate governance.
- o It is pertinent to note that while the utility for Form 3CA-3CD and 3CB-3CD was released on 1st April, 2024 in the previous year, the same has been made available much later this year, only on 18th July, 2025.
- o Natural Calamity specifically in Northern part of India -

In addition, the recent severe floods in Punjab, Himachal Pradesh, Uttar Pradesh, Jammu & Kashmir, Uttarakhand, and adjoining regions have severely disrupted connectivity, infrastructure, and professional activity. The gravity of the situation is evident from the Hon'ble Prime Minister's visit to Punjab recently and thereafter to Uttar Pradesh to personally review the flood damage and relief measures.





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### 4. Our Submissions

- The present position leaves professionals with an impractical 14-day window to complete audits, which is against the legislative intent of the two-month gap envisaged under Section 139(1).
- This situation creates hardship not only for Chartered Accountants but also for taxpayers and companies, as compliance quality may be adversely affected.
- Timely extensions announced well in time would ensure orderly compliance, reduce stress and errors, and uphold the dignity of the profession.

### 5. Our Humble Request

In light of the above, we respectfully request:

- 1. Extension of the due date for furnishing Tax Audit Reports under Section 44AB for AY 2025–26 by at least two months, i.e., till 30th November 2025.
- 2. The due date for completion of **statutory audits under the Companies Act** and for holding AGMs should also be suitably extended in line with the above, to avoid cascading hardship on corporates and professionals alike.

### 6. Support from the Profession

It is pertinent to highlight that in less than 48 hours, more than 8,500 members & tax professionals across India have already signed CASA's online petition supporting this cause, which reflects the urgency and gravity of the issue.

Weblink of our petition -

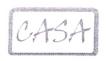
<u>Petition · Campaign for Extension of Tax Audit & Company Audit Due</u> Dates (FY 2024-25) - India · Change.org

#### Request Prayer

We sincerely urge your goodselves to kindly intervene at the earliest and notify an extension, in order to:

- · Safeguard the quality of compliance,
- Provide relief to taxpayers and professionals, and
- Ensure smooth functioning of both Income-tax Act and Companies Act requirements.

We trust the matter will receive your earnest attention and favourable decision at the earliest



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With highest regards,

Yours sincerely

For CASA (Chartered Accountant Social Affiliation), Direct Tax Committee

Sig

CA SUMIT GARG Founder President

Place: Delhi

CC to:

1. The Hon. Minister of State for Finance

Room No. 138, North Block, New Delhi – 110001 Email ID: mosfinance@nic.in

2. The Chairman, CBDT,

Ministry of Finance, Govt. Of India, North Block, New Delhi – 110001 Email ID: chairmancbdt@nic.in

3. Joint Secretary, Tax Policy and Legislation

Ministry of Finance, Govt. Of India, North Block, New Delhi – 110001 Email ID: mosfinance@nic.in

4. The Principal Chief Commissioner of Income Tax (Pr. CCIT)

Room No. 356, CR Building, ITO Lane, IP Estate, New Delhi – 110002 Email ID: delhi.pccit@incometax.gov.in