

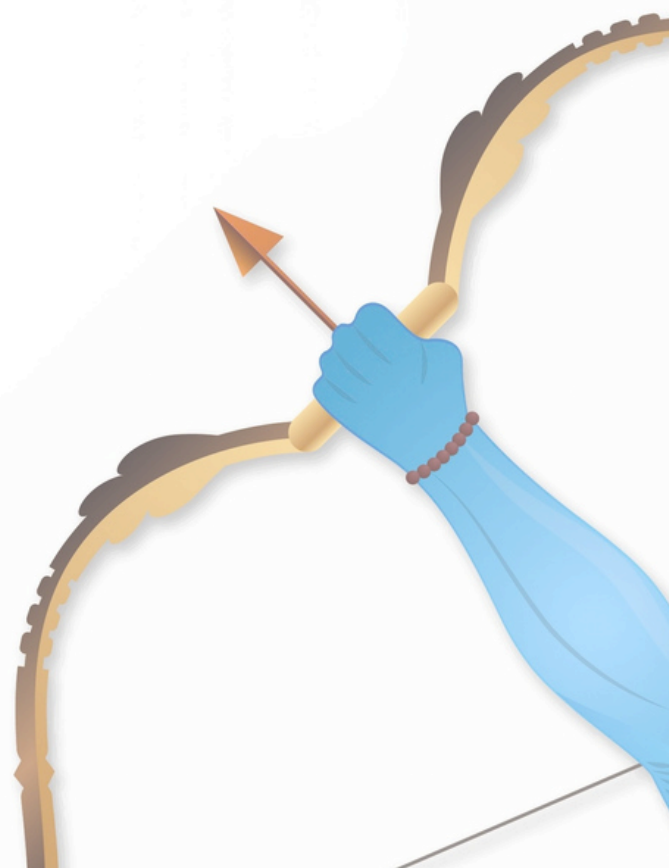


RNM ALERT
SEPTEMBER
NEWSLETTER **VOL NO 212**

Beyond the Ten Heads

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EDITORIAL

Dear Readers

During the month of September 2026 Mr. Raghu Marwah, CEO visited Kolkata and interacted with clients on M&A matters and other business owners.

On the Direct Tax front, the Central Board of Direct Taxes (CBDT) has decided to extend the due date of furnishing the Tax Audit Report from 30 September 2026 to 21 October 2026 and the due date for filing the Income Tax Return to 21 November 2026 from 31 October 2026. This extension would benefit corporate taxpayers, Audited Non-Corporate entities, Partners of audited firms and other specified auditees.

On the Assurance front, the SEBI has formally referred the auditors of Kore Digital Limited ('KDL') to NFRA for appropriate action, if any due to the Rs 541 crore misstatement arising over 2 years in the financial statements of KDL, listed on the NSE Emerge platform. The SEBI has ordered that despite subsidiaries generating majority of consolidated revenue, auditor failed to provide working papers, audit correspondence with subsidiary auditors, compliance with SA 600 (Using the Work of Another Auditor) or verification records.

RNM Capital Trust, an Alternative Investment Fund (AIF) category 3 based out of Gift City catering to Non Residents held its 3rd Investment Committee ('IC') Meeting for the quarter ended 30 September 2026. The independent IC Members, praised the performance, processes and professionalism of the Fund.

RNM Tower, our green certified commercial leasing building in Mohan Co-operative, New Delhi during the month conducted a marketing campaign on LinkedIn. The negotiations with few global co-working players to ensure the ideal tenant mix continues. We are very thankful to the real estate broker community for supporting our initiatives.

We would like to take this opportunity of wishing all our readers Happy Dussehra on 20 October. On this day we celebrate the ultimate victory of good over evil when Lord Rama defeated the demon King Ravana.

U N Marwah
Chairman - RNM India

Direct Tax



The Illumination



Important Circulars / Notification

Circular No. 07/2026 : Extension of timelines for filing of various reports of audit and Income Tax Returns (ITRs) for the Assessment Year 2026-27.

The Central Board of Direct Taxes (CBDT), in exercise of its powers under Section 119 of the Income-tax Act, 1961 (the Act) read with section 536 of the Income-tax Act, 2025, has extended the due date for furnishing Return of Income for the Assessment Year 2026-27 (Previous Year 2025-26) for the persons referred in sl. no.2 of the table below Explanation 2 to sub-section (1) of section 139 of the Act, (assessee liable to get books of accounts audited under Income Tax Act /any other law) from 31.10.2026 to 21.11.2026. Consequently, the specified date for furnishing of report of audit for the Assessment Year 2026-27 (Previous Year 2025-26) stands extended to 21.10.2026 in terms of clause (ii) of Explanation to section 44AB of the Income-tax Act, 1961.

CBDT Extends TDS Reporting for Non-Resident Property Transactions and Updates Forms 132 & 141

The Central Board of Direct Taxes (CBDT) has issued Notification No. 121/2026, which expands the TDS reporting requirements specifically for property transactions involving non-residents. This update impacts all taxpayers and entities engaged in real estate dealings with non-resident individuals or entities. The notification also introduces revised versions of Form 132 and Form 141 to align with these new reporting standards. Taxpayers must ensure they use the updated forms for all relevant filings effective immediately. Failure to comply with these updated TDS reporting requirements may lead to penalties under the Income Tax Act.

Important Circulars / Notification

Part-A. Domestic Tax - Case Law

1.Assessee entitled to interest on refund u/s 244A(1)(b) as TDS demand was quashed before sec. 244A(1B) insertion: HC **[2026] 190 Taxmann.com 752 (Gujarat)**

Where assessee's deposit to cover TDS demand was refunded by Department after High Court quashed order treating assessee-in-default, assessee is entitled to interest on such refund under clause (b) of Section 244A(1) and cannot be denied this interest by invoking Section 244A(1B) inserted with effect from 01.04.2017.

2. Reassessment proceedings invalid as approval u/s 151 was granted mechanically without independent application of mind: ITAT **[2026] 191 taxmann.com 27 (Chandigarh - Trib.)**

Where approval under section 151 for reopening assessment was granted mechanically by merely recording "fit case" without independent examination of reasons recorded by Assessing Officer or material relied upon for reopening, such approval suffered from non-application of mind and could not constitute valid statutory sanction, rendering reassessment proceedings invalid.



3 .Assessee entitled to TDS credit where employer failed to deposit tax as employee cannot be penalized for employer default: HC

[2026] 190 taxmann.com 713 (Delhi)

Where assessee's employer deducted TDS from salary but failed to deposit it with revenue, assessee could not be denied credit for such TDS, as non-deposit was not attributable to assessee and assessee was entitled to legitimate TDS credit despite employer's default.

4. Reassessment u/s 148A(3) invalid as order lacked findings on assessee's explanation and was based on mere scrutiny need: HC

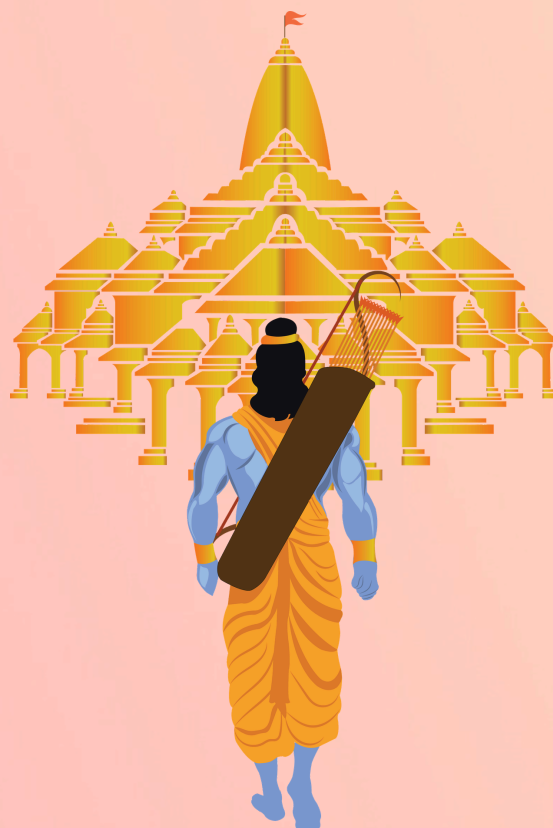
[2026] 190 taxmann.com 436 (Telangana)

Where assessee charitable trust submitted detailed financials, returns and explanations on high-value credits and utilisation of grants, but order under section 148A(3) ignored these materials, offered no finding of false explanation or identification of unaccounted sums and reopening was founded only on voluminous transactions needing verification, such order did not satisfy statutory requirements and reopening was not sustainable.

5. Foreign exchange gain on ECB for Indian asset acquisition taxable under sec. 43AA as sec. 43A inapplicable: ITAT

[2026] 190 taxmann.com 421 (Mumbai - Trib.)

Where assessee recognized unrealized foreign exchange gain on year-end reinstatement of foreign currency ECBs used to acquire capital assets in India, since assets were not imported, section 43A did not apply and such fluctuation was governed by section 43AA, requiring assessee to recognize gain or loss in taxable income computation for relevant year.



Part-B. International Tax - Case Law

1. Commission from referral services not taxable as FTS under India-Netherlands DTAA as no technical know-how made available and no PE in India: ITAT

[2026] 190 taxmann.com 1217 (Delhi - Trib.)

Where assessee, a Netherlands company, earned commission for referring potential customers to its Indian group company, since it did not 'make available' any technical knowledge, skill or know-how to MEI, consideration received for referral services did not qualify as FTS under Article 12(5)(b) of India-Netherlands DTAA or section 9(1)(vii), and commission income, being business income, was not taxable in India in absence of any PE under Article 7.

2. Royalty and FTS received by German entity taxable in India on receipt basis under Article 12 India-Germany DTAA: ITAT

[2026] 190 taxmann.com 416 (Mumbai - Trib.)

Royalty and fees for technical services arising to a non-resident under India-Germany DTAA were taxable in India on receipt basis and not on accrual basis under Article 12 of India-Germany DTAA.

3. Reimbursement without profit element by US intermediary not taxable as FIS under India-US DTAA: ITAT

[2026] 190 taxmann.com 939 (Mumbai - Trib.)

Where Assessing Officer failed to incorporate DRP's directions reducing reimbursement amount and corporate guarantee commission rate in final assessment order and subsequently rectified this omission under section 154 within limitation, such rectification was permissible as mistake was apparent on record and final assessment order remained valid after rectification.

4. Payments for IT support services not taxable as royalty/FIS in absence of copyright or know-how transfer; business profits not taxable without PE as per India-USA DTAA: ITAT

[2026] 190 taxmann.com 464 (Mumbai - Trib.)

Where assessee, a US tax resident, received payments from its Indian group entity for IT and allied support and project services, but did not grant use of any copyright, patent, know-how or proprietary information, nor made available technical knowledge or skill for independent use, such receipts could not be treated as royalty or FIS, and in absence a PE in India, entire consideration was not taxable in India as per Article 7 of India-USA DTAA.



Indirect Tax

The Art of Precision

GST Calendar – Compliance for the month of September 2026.

Nature of Compliances	Due Date
GSTR-7 (Tax Deducted at Source 'TDS')	Oct 10, 2026
GSTR-8 (Tax Collected at Source 'TCS')	Oct 10, 2026
GSTR-1	Oct 11, 2026
IFF- Invoice furnishing facility (Availing QRMP)	Oct 13, 2026
GSTR-6 Input Service Distributor	Oct 13, 2026
GSTR-2B (Auto Generated Statement)	Oct 14, 2026
GSTR-3B	Oct 20, 2026
GSTR-5 (Non-Resident Taxable Person)	Oct 20, 2026
GSTR-5A (OIDAR Service Provider)	Oct 20, 2026
PMT-06 (who have opted for QRMP scheme)	Oct 25, 2026





Key Highlights of September 2026

ITC Blocking under Rule 86A Cannot Continue Beyond One Year

Case: S.S. Gold v. Union of India & Ors.

Court: Bombay High Court

Facts:

The petitioner's Electronic Credit Ledger was blocked under Rule 86A on 17 May 2024 for an amount of approximately ₹7.16 crore. The GST portal reflected the reason for blocking as the supplier being non-functional and its registration having been cancelled.

The taxpayer challenged the blocking before the Bombay High Court.

Issue:

Whether the restriction imposed on utilization of ITC under Rule 86A can continue beyond one year from the date on which such restriction was imposed.

Held:

The Bombay High Court held that Rule 86A(3) expressly provides that the restriction ceases to have effect after expiry of one year from the date of its imposition.

Since the ITC had been blocked on 17 May 2024, the statutory one-year period had expired. The Court accordingly allowed the petition and quashed the blocking order.





ITC BLOCKED UNDER RULE 86A CANNOT BE TREATED AS PRE-DEPOSIT FOR APPEAL

Case: Spherion Solutions Private Limited v. Additional Commissioner, Adjudication, CGST Delhi North & Ors.

Court: Delhi High Court

Facts:

The taxpayer's ITC had been blocked under Rule 86A. The taxpayer was required to make the statutory pre-deposit for filing an appeal under Section 107(6).

The taxpayer contended that the blocked ITC could not be utilized for making the pre-deposit because the Department itself had restricted its utilization.

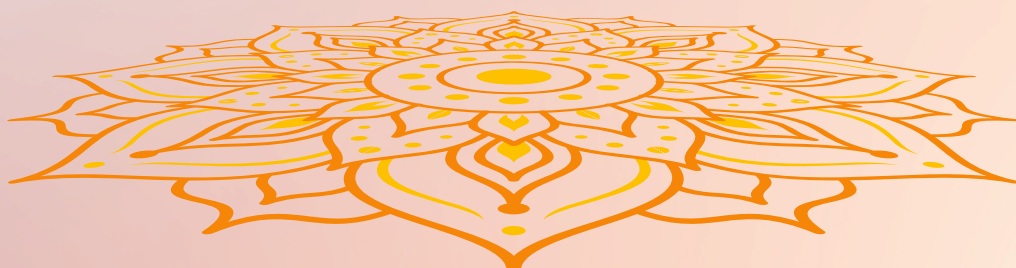
Issue:

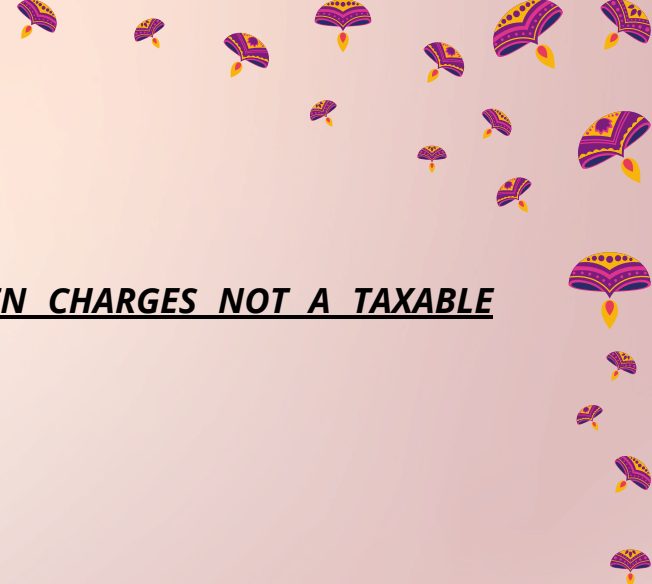
Whether ITC blocked under Rule 86A can be utilized or treated as available credit for satisfying the pre-deposit requirement under Section 107(6) for filing an appeal.

Held:

The Delhi High Court held that blocked ITC cannot be treated as freely available credit for satisfying the statutory pre-deposit requirement while the Rule 86A restriction continues.

The Court recognized the practical difficulty faced by a taxpayer where its credit ledger is blocked and consequently directed appropriate relief in the circumstances of the case.





EMPLOYEE RECOVERY OF SUBSIDISED CANTEEN CHARGES NOT A TAXABLE SUPPLY

Case: Torrent Pharmaceuticals Ltd.

Authority: Gujarat Authority for Advance Ruling

Facts:

Torrent Pharmaceuticals provided subsidized canteen facilities to employees at its:

- Indrad manufacturing plant;
- Bhat R&D facility; and
- Corporate Office, Ahmedabad.

Part of the canteen cost was borne by the company, while the balance amount was recovered from employees through salary deductions.

The company sought clarification regarding the GST treatment of such employee recoveries and the availability of ITC on GST charged by the canteen service provider.

Issue:

Whether the amount recovered from employees towards subsidized canteen facilities constitutes a "supply" under Section 7 of the CGST Act, and whether ITC is available on the GST charged by the canteen service provider.

Held:

The Gujarat AAR held that the amount recovered from employees towards the subsidized canteen facility does not constitute a taxable supply by the employer.

The AAR also held that ITC on the GST charged by the canteen service provider is available to the extent of the cost borne by the employer, subject to the applicable conditions.

The ruling also considered the statutory requirement relating to provision of canteen facilities and the proviso to Section 17(5)(b).





BIOMETRIC AADHAAR AUTHENTICATION FOR GST REGISTRATION

Case: Neha v. Union of India & Ors.

Court: Delhi High Court

Facts:

The proceedings concerned concerns relating to fraudulent GST registrations, including registrations obtained using stolen or frozen PAN/Aadhaar details.

The Court was informed that biometric Aadhaar authentication was being undertaken in cases identified as risky by the system, but concerns remained regarding fraudulent registrations.

The Court also noted data placed before it concerning fraudulent GST registrations and tax evasion.

Issue:

Whether GST authorities should permit registration without biometric-based Aadhaar authentication, particularly in view of concerns regarding fraudulent registrations.

Held:

The Delhi High Court directed that, henceforth, GST registration should not be allowed without biometric-based Aadhaar authentication. The Court granted liberty to the authorities to place before it any practical difficulties in implementing the direction.



Corporate Finance



Bridging Possibilities



Bank Of America To Take 49.9% Stake In Jio Credit For \$1.9 Bn

Goldman Sachs Asset Management's alternatives unit has raised \$11.7 billion (around INR 112,320 crores) across its newest private equity funds and related vehicles, with a notable allocation to Asia. The total comprises \$9.6 billion (around INR 92,160 crores) for its flagship fund, West Street Capital Partners IX (WSCP IX), \$1.6 billion (around INR 15,360 crores) for its dedicated Asia-focused strategy, West Street Asia Equity Partners I, and \$500 million (around INR 4,800 crores) for associated co-investment vehicles. The Asia fund underscores the firm's growing commitment to private equity opportunities in the region. WSCP IX, the ninth vintage of the firm's flagship buyout business, drew capital from institutional and high-net-worth investors across North America, Europe and the Middle East, along with significant commitments from Goldman Sachs and its employees. The fund has already invested in companies including U.S. cybersecurity audit firm Schellman, European medical devices maker Numantec, and U.S. sports representation and marketing agency Excel Sports Management. Michael Bruun, global co-head of private equity at Goldman Sachs Alternatives, told Reuters that more than a third of the capital has already been deployed, with the remainder expected to be invested over roughly four to four-and-a-half years. He added that the firm typically targets companies with enterprise values between \$500 million (around INR 4,800 crores) and \$2–3 billion (around INR 19,200–28,800 crores) and plans to hold its investments for four to five years.

(Source: VC Circle, 16th September 2026)

Private Equity



Macquarie Buys 37.5% Stake in Maple Infrastructure Trust

Australian asset manager Macquarie, through its Macquarie Asia-Pacific Infrastructure Fund 4, has sealed a \$450 million (around INR 4,300 crores) deal to acquire a significant stake in Maple Infrastructure Trust, the InvIT that owns the Maple Highways platform, from Canadian pension fund La Caisse (formerly CDPQ). Macquarie has bought 37.5% of the trust's units, valued at INR 2,702.54 crores (around \$281.5 million), halving La Caisse's holding to 37.5%, along with a 42.5% stake in the investment manager and 40% in the project manager, taking control from La Caisse. Macquarie's total commitment includes \$150 million (around INR 1,440 crores) of fresh equity for future acquisitions, while La Caisse has pledged an additional \$150 million (around INR 1,440 crores) to support the platform's next phase of growth.

(Source: VC Circle, 14th September 2026)

Kotak Realty Fund Invests \$84 Mn in Smartworld

Smartworld Developers, an M3M India affiliate promoted by the Bansal family, has secured about \$83.3 million (around INR 800 crores) in financing from Kotak Realty Fund, the real estate arm of Kotak Alternate Asset Managers. The funds will go into Smartworld Sky Arc and Trump Residences in Gurugram, which together carry a gross development value of over \$854.2 million (around INR 8,200 crores). Planned as a long-term partnership, the deal combines Smartworld's luxury residential pipeline with Kotak's institutional capital, reflecting growing institutional interest in India's luxury housing market.

(Source: VC Circle, 14th September 2026)

AMPIN Secures \$100M from Norfund

India's AMPIN Energy Transition has secured an equity investment of up to \$100 million (around INR 960 crores) from Norfund, the Norwegian government's investment fund for developing countries, made through the Norwegian Climate Investment Fund. The capital will support AMPIN's commercial and industrial projects, utility-scale renewable projects and other energy transition businesses. With this round, the company has raised nearly \$1 billion (around INR 9,600 crores) in total equity to back more than \$4 billion (around INR 38,400 crores) in capital deployment. The deal deepens Norfund's push into India's clean energy market, building on its earlier investments in the sector through firms such as ReNew Power and Enel Green Power.

(Source: VC Circle, 21st September 2026)

ChrysCapital Invests in KDDL and RHI Magnesita India

Homegrown private equity firm ChrysCapital has invested through its public markets platform, Clarus, in two listed manufacturing companies, KDDL Ltd and RHI Magnesita India Ltd. Launched in March 2023, Clarus focuses on listed large, mid-and small cap companies and had a corpus of nearly \$208 million (around INR 2,000 crores) in 2024. Clarus invested \$5 million (around INR 48.21 crores) in KDDL through open market transactions, acquiring a stake of just over 1%, and \$3.75 million (around INR 36 crores) in RHI Magnesita India for a stake of less than 0.5%, based on back-of-the-envelope calculations.

(Source: VC Circle, 23rd September 2026)

Balwaan Krishi Raises \$10.4 Mn in Series B Funding

Jaipur-based agricultural machinery manufacturer Balwaan Krishi has raised \$10.4 million (around INR 100 crores) in a Series B round led by First Bridge India Growth Fund Private Equity, with participation from undisclosed institutional investors. The latest round takes the company's disclosed institutional funding to at least \$16.3 million (around INR 156 crores), excluding undisclosed debt or other investments. Founded in 2016 by Rohit Bajaj and Shubham Bajaj, Balwaan Krishi manufactures affordable farm equipment, including power weeders and sprayers, and operates a hybrid B2B/B2C model with 800+ dealers across northern India and a growing e-commerce presence.

(Source: VC Circle, 28th September 2026)





Venture Capital

Creedom Raise Early-Stage Funding

Creedom, an AI-powered growth coaching platform for content creators, has raised \$0.4 million (around INR 4.1 crores) in a seed funding round at a valuation of \$4.0 million (around INR 42 crores). The round was backed by angel investors including Leigh Hopkins, former EVP and Regional CEO at Walmart; Raghunandan G, Founder & CEO of Zolve; and Kartheeswaran KK, Co-founder & CEO of Ninjacart, among others. The company plans to use the funds towards product development and expansion into the US market. Founded in 2022 by former Ninjacart employees Naveen Murugan, Naveen Sowriraj and Aswin Dhananjai, Creedom connects with creators' Instagram and YouTube accounts to analyse performance data and provide personalised guidance on content performance and recommendations for future content creation.

(Source: VC Circle, 02nd September 2026)

Verlinvest Leads Series B Funding In Sneaker Brand Comet

Belgian investment firm Verlinvest has invested \$10.6 million (around INR 100 crores) in sneaker brand Comet as part of its Series B funding round, with existing investors Elevation Capital and Nexus Venture Partners also participating. The company plans to use the funds for retail expansion, technology capabilities and product R&D, including proprietary sole moulds and tooling. Comet, operated by Grails Marketing Pvt Ltd, currently has 10 stores and plans to expand its portfolio from four to eight footwear models by the end of next year.

(Source: VC Circle, 04th September 2026)

Temasek, London-Listed Seraphim Lead Spacotech Startup Pixxel's Series C

Bengaluru based space-tech startup Pixel has raised US\$100 million (around INR 944 crores) in a Series C funding round co-led by Temasek and Seraphim Space Investment Trust, with participation from new investors 360 One Asset and IMM Investment, alongside existing backers. The round takes Pixxel's total funding to US\$195 million (around INR 1,840 crores) since its founding in 2019 and marks the largest single funding round raised by an Indian space-tech company to date. Pixxel plans to use the proceeds to expand its next-generation Honeybee satellite constellation into short-wave infrared (SWIR) sensing, enhance its Aurora satellite-data platform, strengthen spacecraft and mission infrastructure for government programmes and scale satellite manufacturing.

(Source: VC Circle, 07th September 2026)



Premium Bakery Chain Harley's Plans Maiden Fundraise, Hires Banker

Hyderabad-based premium bakery and café chain Harley's Fine Baking has initiated the process to raise \$10.5–\$13.2 million (around INR 100–125 crores) in its maiden institutional funding round, with Capwise Financial appointed as the investment banker. The company plans to use the proceeds to fund its expansion across India, with the round expected to attract venture capital investors with expertise in the food and beverage sector. Founded in 2019, Harley's operates 60+ outlets and cloud kitchens across Hyderabad, Bengaluru, Mumbai, Vijayawada, Pune and Gurugram.

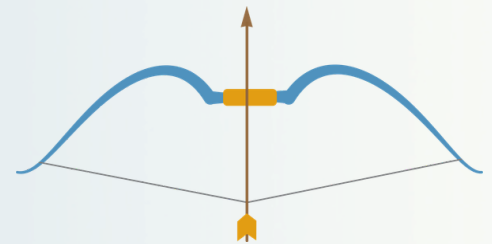
(Source: VC Circle, 07th September 2026)

Quick Food-Delivery Startup Swish Raises \$24 Mn

Bengaluru-based foodtech startup Swish has raised \$24 million (around INR 229 crores) in a funding round led by Bertelsmann India Investments (BII), with existing investors Accel, Bain Capital Ventures and Hara Global also participating. The company plans to deploy the capital towards expanding its kitchen network and supply-chain infrastructure, with a roadmap to build 1,000+ kitchens over the next five years. Founded by Aniket Shah, Ujjwal Sukheja and Saran S., Swish operates an integrated food-delivery model, owning its kitchens, ordering platform and last-mile delivery within a defined radius.

(Source: VC Circle, 10th September 2026)

Mergers & Acquisitions



ITC Arm To Acquire 22.1% Stake In Happiest Minds For \$140 Mn

ITC has announced that its IT arm will acquire a 22.1% stake in Happiest Minds Technologies for \$140 million (around INR 1,330 crores) in cash as part of a proposed merger with the IT services company. The combined entity is targeting \$1 billion in revenue by FY28, with the transaction expected to take approximately three to eight months to complete. Under the proposed scheme, shareholders of Happiest Minds will receive 25 shares of IT Infotech for every 81 shares held, while ITC will become the promoter of the merged entity with a 73.4% stake. Following the transaction, IT Infotech is expected to be listed on both the BSE and NSE.

(Source: VC Circle, 01st September 2026)

InvAscent-Backed RPG Active Pharma Buys Raghava Life Sciences' API Business

RPG Life Sciences has agreed to acquire the bulk drugs and intermediates business of Raghava Life Sciences for \$14.2 million (around INR 135 crores) through its subsidiary RPG Active Pharma, via a slump sale on a going-concern basis. The acquisition forms part of RPG Life Sciences' buy-and-build strategy to create an integrated, scaled API-focused platform and is subject to customary closing conditions and regulatory approvals. The business operates a WHO-GMP and EU-GMP-approved API manufacturing facility near Hyderabad, with around 300 KL of installed capacity and a dedicated R&D setup.

(Source: VC Circle, 03rd September 2026)



Blackstone Backed Nexus Select Trust To Acquire Guwahati Mall And Hyatt Hotel

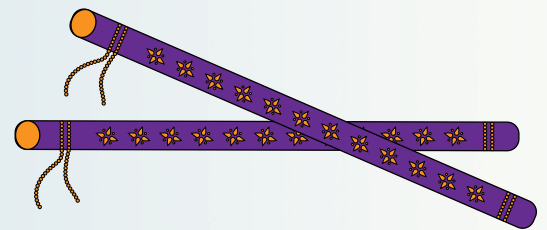
Blackstone-backed Nexus Select Trust has approved the acquisition of a 100% stake in Galaxy Infra Creations Pvt Ltd (GICPL) at an enterprise value of \$167.6 million (around INR 1,600 crores). GICPL is developing a shopping mall with approximately 516,000 sq. ft. of gross leasable retail area and a 164-key Hyatt Regency hotel in Guwahati, both currently under construction on NH-27. The transaction will be funded through a combination of cash and unit swap, with Nexus Select Trust expected to assume full ownership and control of GICPL upon completion.

(Source: VC Circle, 10th September 2026)

Dr Lal PathLabs Acquires 70% Stake in SN Genelab

Dr Lal PathLabs, India's largest diagnostics chain, has agreed to acquire a 70% controlling stake in Surat-based SN Genelab Pvt Ltd for \$17.5 million (around INR 168 crores) in cash, plus a performance-linked earn-out capped at \$3.3 million (around INR 31.5 crores), to strengthen its genomics capabilities and broaden its advanced diagnostics portfolio. Founded in 2013, SN Genelab operates three labs in India and one in the UAE, offering diagnostics and genomics testing in oncology, rare diseases, reproductive health and infectious diseases.

(Source: VC Circle, 10th September 2026)



Thyrocare to Sell Radiology Unit to Trovera for \$15 Mn

Thyrocare Technologies has received board approval to sell its radiology business, Nueclear Healthcare Ltd, to Trovera Healthcare Pvt Ltd for nearly \$15 million (around INR 141.4 crores) in a cash-and-stock deal, roughly a month after its parent company sold part of its stake to reduce debt. Thyrocare will receive about \$8.5 million (about INR 81.9 crores) in cash and \$6.2 million (around INR 59.5 crores) in compulsorily convertible preference shares of Trovera, subject to adjustments. It will also buy Nueclear's land and buildings in Gurugram and Hyderabad, which house its labs, for \$2.1 million (around INR 20.58 crores). The sale is expected to be completed by November 30, 2026.

(Source: VC Circle, 22nd September 2026)



Transaction & Regulatory Advisory Services



The Many Faces of Complexity

Key Regulatory & Legal Updates in September 2026

1.MCA

- **Extension of tenure of Technical Members of NCLAT**

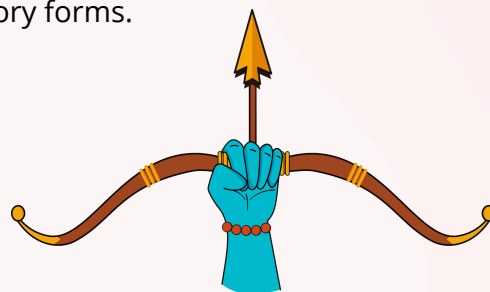
The Ministry of Corporate Affairs has issued notifications during September 2026 extending the tenure of certain Technical Members of the **National Company Law Appellate Tribunal (NCLAT)**. The extensions are intended to ensure continuity in the functioning of the Tribunal and disposal of matters under the Companies Act, 2013 and related laws.

Read More: <https://www.mca.gov.in/>

- **Companies (Indian Accounting Standards) Amendment Rules, 2026 notified**

MCA continues to operate the **MCA21 V3 filing framework**, with stakeholders being advised to use the updated filing processes, FAQs and functionality available on the MCA portal. The Ministry has also continued issuing stakeholder guidance relating to company and LLP forms, including incorporation, annual filing and other statutory forms.

Read More: <https://www.mca.gov.in/>



2. FEMA / RBI

- **Foreign Exchange Management (Non-debt Instruments) (Fourth Amendment) Rules, 2026**

The Central Government has amended the **Foreign Exchange Management (Non-debt Instruments) Rules, 2019** to permit an e-commerce entity to undertake an **inventory-based model of e-commerce exclusively for exporting goods or products manufactured or produced in India**, subject to the Foreign Trade Policy, Handbook of Procedures and applicable FEMA export regulations. The amendment also provides that the existing restrictions relating to B2C and inventory-based e-commerce will not apply to such permitted export transactions.

Read More: <https://www.rbi.org.in>

- **Amendment to Foreign Exchange Management (Export and Import of Goods and Services) Regulations, 2026**

The Reserve Bank of India has notified amendments to the **Foreign Exchange Management (Export and Import of Goods and Services) Regulations, 2026**. The amendments revise certain timelines and provisions governing export and import transactions and are aimed at simplifying the regulatory framework applicable to cross-border trade transactions. The amendments are to come into effect from **1 October 2026** and should therefore be considered for transactions undertaken from that date.

Read More: <https://www.rbi.org.in>

- **Review of Circulars issued under FEMA, 1999**

The Reserve Bank of India has undertaken a review of circulars issued under the **Foreign Exchange Management Act, 1999** and withdrawn certain circulars that had become inoperative due to subsequent amendments, redundancy, overlap or supersession. The measure forms part of RBI's ongoing initiative to rationalise and streamline the FEMA regulatory framework.

Read More: <https://www.rbi.org.in>

3. Securities and Exchange Board of India (SEBI)

- **Ease of regulatory compliances for FPIs investing only in Government Securities**

SEBI has introduced measures to **ease regulatory compliances for Foreign Portfolio Investors (FPIs) investing exclusively in Government Securities**. The measure is intended to simplify the compliance framework applicable to such FPIs while maintaining the necessary regulatory and reporting requirements.

Read More: <https://www.sebi.gov.in>

- **Relaxation in timeline with respect to Accredited Investor mandate for Angel Funds**

SEBI has relaxed the timeline relating to the **Accredited Investor mandate for Angel Funds**. The measure provides additional time to comply with the applicable accredited-investor requirements and is intended to facilitate smoother implementation of the regulatory framework applicable to Angel Funds.

Read More: <https://www.sebi.gov.in>

- **Review of position limits for clients in Commodity Derivatives Segment**

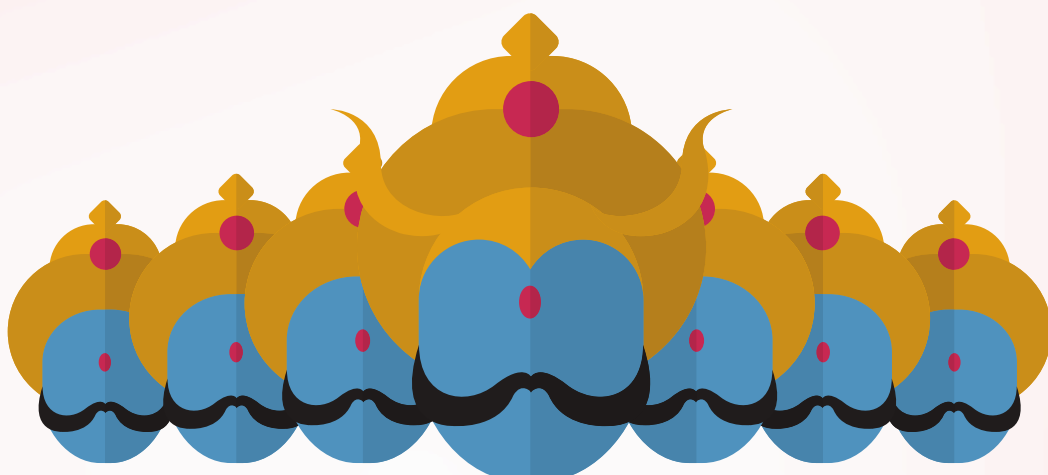
SEBI has reviewed the **position limits applicable to clients in the Commodity Derivatives Segment** along with the penalty provisions for violation or breach of the prescribed position limits. The changes are aimed at strengthening the risk-management framework and ensuring appropriate controls over positions held in commodity derivative contracts.

Read More: <https://www.sebi.gov.in>

- **Review of position limits for clients in Commodity Derivatives Segment**

At its Board Meeting held on **24 September 2026**, SEBI approved various regulatory measures relating to the securities market, including changes to the **settlement framework**, introduction of a **common advertising code for specified regulated entities**, and measures relating to investment by Portfolio Managers in mutual fund units. The Board also considered measures concerning commodity derivatives and other regulatory matters.

Read More: <https://www.sebi.gov.in>



GIFT City Update



The Courage to Go Beyond

02 Sep 2026: GIFT IFSC Emerges as a Growing International Banking Hub, Mobilises Over \$52.8 Billion Through FCNR(B) Swap Facility.

GIFT City's International Financial Services Centre (GIFT-IFSC) is emerging as an increasingly important hub for international banking and cross-border capital flows, with banks using the platform to mobilise foreign currency and access global sources of financing. As of 31 August 2026, 20 International Banking Units (IBUs) operating at GIFT-IFSC had sanctioned **\$54.02 billion** under the RBI's special swap facility for FCNR(B) deposits. Of this, approximately **\$52.82 billion had already been disbursed**, highlighting the rapid scale-up in activity. The pace of mobilisation has accelerated significantly in recent weeks. Aggregate sanctions rose from **\$28.60 billion on 14 August to \$37.26 billion on 21 August**, before reaching **\$54.02 billion by 31 August**. The participation of both Indian and international banks reflects the growing depth of GIFT-IFSC's banking ecosystem and its ability to connect Indian financial institutions with global sources of foreign-currency liquidity.

Rising ECB and International Bond Activity.

The momentum extends beyond the FCNR(B) swap facility. Between **April and August 2026**, **IBUs at GIFT-IFSC disbursed \$11.62 billion in External Commercial Borrowings (ECBs)**. Monthly ECB disbursements increased from **\$1.54 billion in April to \$3.54 billion in August**, indicating rising utilisation of GIFT-IFSC for cross-border financing. International capital-market activity has also expanded. **Indian banks raised \$11.12 billion through bond listings on IFSC exchanges between April and August 2026**, with **\$9.17 billion of these listings taking place during July and August alone**. Together, these developments point to a broader diversification of GIFT-IFSC's role—from facilitating foreign-currency liquidity to supporting ECBs and providing access to international capital markets. The increasing use of GIFT-IFSC is also being supported by fund mobilisation from a wide range of international markets, including the **UK, US, Mexico, West Asia, Hong Kong, Singapore and select African countries**. The development follows the Union Finance Minister's direction to public-sector banks to make greater use of the financial-services ecosystem and institutional infrastructure available at GIFT-IFSC for implementing RBI's FCNR(B) swap facilities and ECB financing.

IFSCA Chairperson **K. Rajaraman** said the rapid expansion of banking activity demonstrates the growing international orientation of GIFT-IFSC and its ability to act as a bridge between global pools of capital and India's financing requirements.

With strong growth across **FCNR(B) mobilisation, ECB financing and international bond issuance**, GIFT-IFSC is gradually developing into a more diversified international banking ecosystem and an important channel connecting **global capital with Indian financial and financing opportunities**.

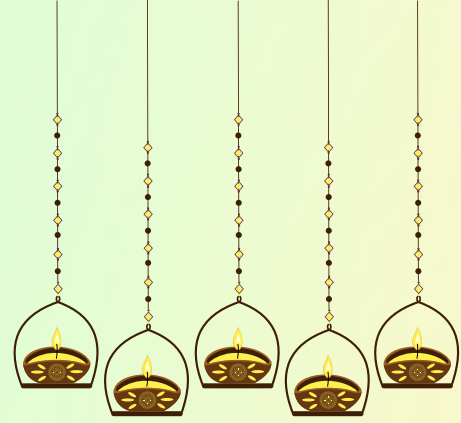


03 Sep 2026: GIFT IFSC Continues to Scale, Business Activity Expands Across Banking, Capital Markets and Fund Management

The **International Financial Services Centres Authority (IFSCA)** has released its **Q1 FY2026-27 Quarterly Bulletin**, highlighting continued expansion across the GIFT City International Financial Services Centre (IFSC) during **April-June 2026**. The number of registrations and authorisations across the IFSC ecosystem rose to **1,336 as of June 30, 2026**, including 76 in-principle or provisional approvals, compared with **1,213 at the end of March 2026**. **Banking activity remained a key driver**. Outstanding assets of IFSC Banking Units (IBUs) increased to **\$120.69 billion at the end of June**, from \$111 billion at the end of March. IBUs also booked **\$15.42 billion of trade-finance transactions** during the quarter. Capital-market activity was equally significant, with **6.93 million contracts worth \$317.01 billion** traded on IFSC exchanges during Q1. Debt listings amounted to **\$2.20 billion**, including **\$500 million of ESG-labelled debt**. The **fund-management ecosystem** also continued to deepen. By June-end, **235 Fund Management Entities were managing 401 funds/schemes**. Cumulative commitments increased to \$45.08 billion from \$39.09 billion, while cumulative funds raised rose to \$22.93 billion from \$19.51 billion at the end of March. Insurance activity recorded a sharp increase, with premiums written by IFSC Insurance Offices more than doubling to **\$419.16 million** during the quarter from \$202.30 million in the previous quarter. Gross reinsurance premiums accounted for more than **\$400 million**, compared with \$186.93 million previously. The **aircraft and ship-leasing ecosystem** also expanded. Aviation assets under leasing increased to **412 from 373**, while the number of ships leased rose to **42 from 37** during the quarter. Other financial services showed continued momentum. Payment-account transaction value increased more than threefold to **\$110.99 million**, from \$36.26 million in the previous quarter. The value of **ITFS transactions** also increased to **\$126.92 million from \$105.75 million**. Meanwhile, the number of financial-support service entities, including Global In-house Centres, with final authorisations reached **143**.

Overall, the Q1 FY2026-27 data points to **broad-based growth across GIFT IFSC**, with banking, capital markets, fund management, insurance, leasing and financial-support services all expanding. The numbers suggest that the ecosystem is moving beyond its initial development phase and increasingly functioning as a diversified international financial centre.





08 Sep 2026: IFSCA Introduces Unified Market Abuse Framework for GIFT IFSC Securities Markets

The **International Financial Services Centres Authority (IFSCA)** has notified the **IFSCA (Prohibition of Market Abuse in Securities Markets) Regulations, 2026**, published in the Official Gazette on **5 September 2026**. The new framework is aimed at strengthening investor protection, market integrity and orderly functioning of securities markets in GIFT IFSC.

The regulations replace the earlier applicability of **SEBI's Insider Trading Regulations, 2015 and Prohibition of Fraudulent and Unfair Trade Practices Regulations, 2003** in the IFSC, bringing insider trading and market-abuse provisions under a **single regulatory framework**. The rules have been developed with reference to **IOSCO principles and global regulatory practices**, including principles relating to regulatory surveillance, investigation, inspection and enforcement. A key provision is the definition of **Material Non-Public Information (MNPI)**-information that is not publicly available and could materially affect the price of an entity's securities once disclosed. An **insider** includes both connected persons and anyone possessing or having access to such information.

The regulations prohibit insiders from **communicating or providing access to MNPI** except for legitimate purposes, performance of duties or legal obligations. They also prohibit trading while in possession of MNPI, subject to specified exceptions such as certain off-market transfers, statutory transactions, stock-option exercises and trades under approved trading plans. The framework also introduces **greater disclosure requirements for designated persons**. Controlling shareholders, directors and other designated persons must disclose their trades to the listed entity within two trading days when the value of transactions during a quarter exceeds **\$25,000**, or another threshold specified by IFSCA. Listed entities must subsequently notify the relevant stock exchange and publish the information on their websites. The regulations further prohibit **fraudulent, manipulative and deceptive activities**, including schemes designed to defraud investors and practices that constitute fraud or unfair dealing in securities. Finally, entities listed on recognised IFSC stock exchanges will be required to maintain **effective internal controls and a formal code of conduct** to prevent insider trading and market abuse.

Overall, the new regulations provide GIFT IFSC with a **dedicated and unified market-abuse framework**, bringing its securities-market oversight closer to international regulatory standards while replacing the earlier SEBI framework applicable within the IFSC.



16 Sep 2026: IFSCA Eases Fund Management Rules to Boost GIFT IFSC's Global Fund Industry

The **International Financial Services Centres Authority (IFSCA)** has notified the **Second Amendment to the IFSCA (Fund Management) Regulations, 2025**, on **10 September 2026**, introducing several changes aimed at making fund management easier while strengthening investor protection and regulatory clarity at GIFT IFSC.

A key change is greater flexibility for **close-ended Restricted Schemes**, which may move from semi-annual to annual NAV computation and disclosure with approval from at least **75% of investors by value**. Independent valuation requirements have also been relaxed where the underlying investments are already independently valued. IFSCA has increased the scope for fund managers with Indian ultimate beneficial owners to build an international track record. FMEs and their associates can now contribute up to **25% of the corpus**, compared with the earlier 10%, for VC and Restricted Schemes investing exclusively in IFSC or overseas markets.

The amendments also provide greater flexibility to **VC Schemes**, allowing them to participate in subsequent funding rounds even after an investee company crosses 10 years from incorporation, subject to conditions. Other measures include exemptions from certain concentration limits for qualifying Fund-of-Funds schemes, flexibility to appoint a **common auditor** for government-backed funds and their FMEs, and extending the deadline for submitting annual scheme reports from **four to six months**.

At the same time, investor protection has been strengthened through additional **retail-scheme disclosures**, including NAV calculation methodology and conflicts of interest, along with greater oversight of internal policies by the FME's governing body. The amendments also allow temporary deployment of scheme funds in **capital-preserving and liquid instruments** before the minimum corpus is achieved and provide greater flexibility around investor approvals and appointment timelines for key service providers.

Overall, the changes seek to **reduce operational friction for fund managers, provide greater flexibility for international fund structures and strengthen governance and disclosure standards**, supporting GIFT IFSC's ambition to develop into a globally competitive fund-management centre.





23 Sep 2026: IFSCA Expands Global Investment Access for Retail Investors at GIFT IFSC

The **International Financial Services Centres Authority (IFSCA)** has expanded the list of jurisdictions from which registered IFSC distributors can offer capital-market products and services to **non-sophisticated investors**.

Under a circular issued on **18 September 2026**, IFSCA amended its Master Circular for Distributors in the IFSC, adding the **UAE, Singapore, Australia and the European Union** to the existing list of seven permitted jurisdictions-US, Japan, South Korea, UK, France, Germany and Canada.

The move is aimed at **facilitating cross-border distribution, widening the range of investment products available to investors and creating additional business opportunities for distributors operating in GIFT IFSC.**

Overall, the amendment further strengthens GIFT IFSC's role as a platform for connecting Indian and international investors with a broader range of global capital-market products.



25 Sep 2026: IFSCA Opens Door to Differential Fund Structures to Support Blended Finance

The **International Financial Services Centres Authority (IFSCA)** has introduced a new framework allowing **Venture Capital Schemes and Restricted Schemes at GIFT IFSC to issue different classes of units with different distribution rights**, aimed at facilitating blended finance and other specialised fund structures.

Under the circular issued on **25 September 2026**, funds can create **junior or subordinate classes of units** that may receive lower returns or absorb a higher share of losses than other classes. This structure allows different investors to take different levels of risk and potentially helps attract commercial capital into projects that may otherwise be difficult to finance.

The framework also allows qualifying **ESG Schemes aligned with one or more UN Sustainable Development Goals (SDGs) to accept grants**, subject to applicable conditions. Foreign-source grants must comply with the Foreign Contribution (Regulation) Act, where applicable, and grants cannot constitute the majority of the fund's corpus.

Given the higher risk associated with junior units, the minimum investment has been set at **\$1 million for Accredited Investors and \$2 million for other investors**.

IFSCA has also introduced enhanced disclosure requirements. Funds must clearly explain the **distribution waterfall, rights and risks of each unit class, conversion triggers and methodology**, grant-management policies, and NAV calculation methodology. NAV for each class must be calculated by an **independent valuer**.

The framework is intended to make GIFT IFSC more suitable for **blended-finance structures that combine concessional or philanthropic capital with commercial capital**, particularly for sustainable, climate and socially desirable projects where conventional commercial funding may be insufficient.

Overall, the move gives fund managers greater flexibility in structuring capital while adding specific disclosure and investor-protection requirements for these more complex investment structures.



Tax Calendar



The Dawn of Transformation

September 2026 - Tax Calendar

7 TH OCT	Due date of Deposit of TDS/ TCS for the Month of Sep, 2026
7 TH OCT	Uploading of declarations received in Form No. 127 (Income-tax Rules, 2026) from the buyer in the month of September, 2026
21 ST OCT	Due date for filing of audit report under section 44AB (Income-tax Act, 1961) for the assessment year 2026-27 in the case of a corporate-assessee or non-corporate assessee (who is required to submit his/its return of income on October 31, 2026) <i>Note: The due date for filing of audit report has been extended from September 30, 2026, to October 21, 2026, vide Circular No. 07/2026, dated 28-09-2026</i>
21 ST OCT	Furnishing report under section 115JC (Income-tax Act, 1961) in Form no. 29C (Income-tax Rules, 1962) for computing Adjusted Total Income and Alternate Minimum Tax of the person other than company during the previous year 2025-26 (if the assessee is required to submit return of income on October 31, 2026) <i>Note: The due date for filing of report has been extended from September 30, 2026, to October 21, 2026 vide Circular No. 07/2026, dated 28-09-2026</i>
21 ST OCT	Furnishing report under section 115JB (Income-tax Act, 1961) in Form No. 29B (Income-tax Rules, 1962) for computing the book profits of the company during the previous year 2025-26 (if the assessee is required to submit return of income on October 31, 2026) <i>Note: The due date for filing of report has been extended from September 30, 2026, to October 21, 2026 vide Circular No. 07/2026, dated 28-09-2026</i>
21 ST OCT	Furnishing of the report in Form No. 3CEA (Income-tax Rules, 1962) relating to computation of capital gains in case of slump sale taxable under section 50B (Income-tax Act, 1961) (if the assessee is required to submit return of income on October 31, 2026) <i>Note: The due date for filing of report has been extended from September 30, 2026, to October 21, 2026 vide Circular No. 07/2026, dated 28-09-2026</i>
21 ST OCT	Furnishing of Audit Report in Form No. 10CCB (Income-tax Rules, 1962) by assessee claiming deduction under section 80-I, 80-IA, 80-IB or section 80-IC (Income-tax Act, 1961) (if the assessee is required to submit the return of income on or before October 31, 2026)
21 ST OCT	Furnishing report in Form No. 10DA (Income-tax Rules, 1962) certifying the claim for additional employee cost under section 80JJAA (Income-tax Act, 1961) during the previous year 2025-26 (if the assessee is required to submit return of income on or before October 31, 2026)

September 2026 - Tax Calendar

21 ST OCT	Furnishing of Audit report in Form No. 10B/10BB (Income-tax Rules, 1962) by a fund or trust or institution or any university or other educational institution or any hospital or other medical institution
21 ST OCT	Furnishing audit report in Form No. 3AC (Income-tax Rules, 1962) by assessee claiming deduction under section 33AB (Income-tax Act, 1961) for the previous year 2025-26 (if the assessee is required to submit return of income on October 31, 2026) <i>Note: The due date for filing of audit report has been extended from September 30, 2026, to October 21, 2026, vide Circular No. 07/2026, dated 28-09-2026</i>
30 TH OCT	Furnishing of challan-cum-statement in Form No. 141 (Income-tax Rules, 2026) in respect of deduction of tax under section 393(1) [Table Sl. No. 2(i), 3(i), 6(ii) & 8(vi)] of the Income-tax Act, 2025 for the month of September 2026.
31 ST OCT	Filing of quarterly statement in Form No. 140 (Income-tax Rules, 2026) by deductors responsible for deduction of tax at source on non-salary payments such as commission, brokerage, professional fees, rent, etc. made to residents for the quarter ending September 30, 2026
31 ST OCT	Filing of quarterly statement of collection of tax at source under section 397(3)(b) of the Income-tax Act, 2025 in Form No.143 (Income-tax Rules, 2026) for the quarter ending September 30, 2026
31 ST OCT	Filing of quarterly statement of TDS in Form No. 144 (Income-tax Rules, 2026) in respect of payments other than salary made to non-residents for quarter ending September 30, 2026
31 ST OCT	Filing of quarterly statement in Form No. 138 (Income-tax Rules, 2026) by employers responsible for TDS from salaries paid to employees under section 392 or by specified bank in respect of income paid to specified senior citizen under section 393(1) [Table: Sl. No. 8(iii)] of the Income-tax Act, 2025 for the quarter ending September 30, 2026
31 ST OCT	Audit report under section 44AB (Income-tax Act, 1961) for the assessment year 2026-27 in the case of an assessee who is also required to submit a report pertaining to international or specified domestic transactions under section 92E (Income-tax Act, 1961).
31 ST OCT	Furnishing of certificate in Form No. 10-IJ (Income-tax Rules, 1962) issued by a Chartered Accountant certifying the annual statement of exempt income of the specified fund, being a category-III AIF, under section 10(23FF) (Income-tax Act, 1961) (if the assessee is required to submit the return of income on or before November 30, 2026).



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