

REGULATORY UPDATE

**Half Yearly Audit Report on
Reconciliation of Share Capital**

(PAS 6)



Unlisted Public Companies to Submit Half Yearly Audit Report on Reconciliation of Share Capital in Form PAS 6

The Ministry of Corporate Affairs (MCA), with a view to reinforce the investor interest and better corporate governance, amended the Companies (Prospectus and Allotment of Securities) Rules, 2014 by issuing Companies (Prospectus and Allotment of Securities) Third Amendment Rules, 2019 vide its **notification dated 22nd May 2019** which is effective from 30th September 2019.

The amended rules requires the Unlisted Public Companies to file the Audit Report on Reconciliation of Share Capital in Form PAS 6 as on the end of every half year with effect from September 30, 2019 duly certified by a Company Secretary/Chartered Accountant in practice.

The due date for filing of MCA Form PAS 6 (after deployment of Form on MCA Website) are as follows:

S. No	Financial Year	Period of Report	Due Date
1	2019-20	01.04.2019 to 30.09.2019	13.09.2020
2	2019-20	01.10.2019 to 31.03.2020	13.09.2020
3	2020-21	01.04.2020 to 30.09.2020	29.11.2020

Here, it is pertinent to note that in case an Unlisted Public Company which has yet not dematerialized its share capital, it is imperative to do so immediately, to be eligible to file the said Report in Form PAS-6 on timely basis.

Penalty

The **Company** and every **officer** of the company who is **in default** or such other person shall be punishable with fine which may extend to **ten thousand rupees**, and where the contravention is continuing one, with a further fine which may extend to **one thousand rupees** for every day after the first during which the contravention continues.

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