P G BHAGWAT LLP

NETWORK

LRN: W/00003

2026 EDITION SERIES · FORTS OF CHHATRAPATI SHIVAJI MAHARAJ

Raigad Fort

The mountain capital of the Maratha Swarajya, where Shivaji Maharaj was crowned in 1674 — a seat chosen for its command, resilience and reach. A fitting vantage for staying ahead of what changes.

NETWORK EDITION

Regulatory Updates · June 2026

The **P G BHAGWAT LLP NETWORK** is glad to share the **June 2026** updates — the month's most relevant changes across **FEMA, GST, FCRA and MCA**, distilled so you can see what applies to you, what to do, and by when. Each item sets out who it applies to, what has changed and what to do — so you can act on what is relevant to you and pass over what is not.

Authored by the Network Technical Desk

This edition: **8** updates · **4** with dated actions

THE NETWORK

Three firms, one network

P G BHAGWAT LLP NETWORK is registered with the Institute of Chartered Accountants of India under LRN W/00003. Member firms practise independently under the lead-firm model.

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MEMBER FIRM

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THE STRENGTH OF THE NETWORK

3 FIRMS IN THE NETWORK	**18+** PARTNERS	**350+** TEAM MEMBERS
300+ YEARS COMBINED PARTNER EXPERIENCE	**88+** YEARS OF LEAD-FIRM LEGACY	**7** CITIES SERVED IN INDIA

Combined figures across the member firms. The network's reach grows as it expands under the ICAI Networking Guidelines.

FROM THE WATCHTOWER — READ THIS FIRST

Four of this month's eight changes carry a date or a cash-flow impact.

If you're short on time, these are the ones to act on. The rest are awareness items grouped by regulator overleaf.

RBI · FEMA · EXPORTERS

Export proceeds window cut: 15 months → 9 months

Exporters must now realise and repatriate export value within nine months. Shorter cycle, tighter follow-up, working-capital impact.

Effective now (on Gazette, ~5 Jun 2026)

MCA · ALL COMPANIES

DPT-3 additional-fee waiver extended to 31 July

Relief after the MCA data-centre fire: file the FY 2025-26 Return of Deposits by 31 Jul without additional fees. Automatic — no request needed.

File by 31 Jul 2026

GST · MOST BUSINESSES

"Ship-To GSTIN" + EWB changes go live 1 August

Mandatory Ship-To GSTIN capture and voluntary e-Way Bill closure — deferred from 15 Jun. Use the runway to ready your ERP/API and test in Sandbox.

Live 1 Aug 2026

MHA · FCRA-REGISTERED ENTITIES

FCRA compounding penalties made granular — and steeper

New per-offence penalty heads under ss. 35 & 37, including 100% of returns on speculative use. Applies to cases not yet disposed.

Effective 22 Jun 2026

IN THIS EDITION

Eight updates across four regulators. Each is tagged by how much it needs from you. **Tap any line to jump to that update.**

JUMP TO RBI · FEMA | GST | FCRA | MCA | Calendar

4 **e-Invoice / EWB-by-IRN API changes** — Ship-To GSTIN & EWB closure in APIs ACTION

MHA · FCRA

5 **FCRA Amendment Rules, 2026** — new definition of "Key Functionary" ADVISORY

6 **FCRA penalty table revised** — new compounding heads for s.35 & s.37 offences ACTION

MCA

7 **DPT-3 relief** — additional-fee waiver for FY 2025-26 up to 31 July 2026 ACTION

8 **S.O. 3140(E)** — New Development Bank specified under s.2(11)(ii) INFO

RBI · FEMA

2 updates ↑ Contents

ACTION | EXPORT OF GOODS & SERVICES (FIRST AMENDMENT) REGS, 2026

1 Export-proceeds realisation window cut from 15 months to 9 months

EFFECTIVE
~5 Jun 2026

APPLIES TO Exporters of goods and services (and their AD banks tracking EDPMS).

— WHAT CHANGED

- Regulation 9 of the FEM (Export of Goods & Services) Regulations, 2015 is amended: the time limit to realise and repatriate full export value is reduced from **15 months** to **9 months**.
- The substitution applies in two places — sub-regulation (1) (the general limit) and sub-regulation (2)(a). No new exceptions were added.

— WHAT YOU SHOULD DO

- Shorten collection cycles and tighten follow-up with overseas buyers and banks.
- Review outstanding export bills against the new nine-month clock; align internal EDPMS monitoring.
- Revisit trade-finance and working-capital assumptions built on the old fifteen-month window.

> **BOTTOM LINE**
> *A compressed realisation period — mostly a cash-flow and tracking discipline change, not a documentation one, but non-compliance now bites sooner.*

Source: rbi.org.in — FEMA notifications

FEM (Export of Goods & Services)(First Amendment) Regulations, 2026 · dated 5 June 2026 · effective on Gazette publication.

ADVISORY | DEPOSIT (SIXTH AMENDMENT) REGS, 2026

2 SNRR accounts opened up to IFSC; Schedule 4 streamlined

ISSUED
18 Jun 2026

APPLIES TO AD banks (incl. IFSC/GIFT City branches) and non-residents operating SNRR accounts.

— WHAT CHANGED

- An **IFSC** definition is inserted (aligned to the IFSCA Act, 2019).
- Regulation 5(4) now lets any person resident outside India hold an SNRR account with an AD in India **or its branch outside India, including in an IFSC**.
- Schedule 4 is reworked: purpose clause restated to cover current, capital and bona-fide transactions; redundant paras (2, 5–8) deleted; NRO-to-SNRR transfers aligned to Schedule 3; new para 16 clarifies non-resident-to-non-resident dealings via SNRR.
- Schedules 1 & 3 amended to permit NRO/NRE/SNRR transfers within FEM (Remittance of Assets) limits.

— WHAT YOU SHOULD DO

- AD banks: update SOPs for SNRR opening/operation at IFSC branches and for NRO/NRE/SNRR transfers.
- Non-residents transacting via GIFT City: the route is now explicit — factor it into cross-border structuring.

> **BOTTOM LINE**
> *A liberalising, GIFT-City-friendly change — narrow in audience, but useful for anyone routing non-resident rupee flows through India's IFSC.*

Source: **rbi.org.in — Notification 13553**

FEM (Deposit)(Sixth Amendment) Regulations, 2026 · issued 18 June 2026 · effective on Gazette publication.

ACTION | GSTN ADVISORY · E-WAY BILL

3 "Ship-To GSTIN" & voluntary EWB closure — go-live deferred to 1 August

LIVE FROM
1 Aug 2026

APPLIES TO All GST taxpayers generating e-Way Bills; GSPs and ERP vendors.

— WHAT CHANGED

- Two E-Way Bill functionalities announced for 15 Jun 2026 are deferred to **1 Aug 2026** : mandatory capture of "Ship-To GSTIN" in Bill-To/Ship-To transactions, and voluntary closure of an e-Way Bill.
- Only the effective date moves — the substance is unchanged. The deferral followed industry representations on system, API/ERP and master-data readiness.

— WHAT YOU SHOULD DO

- Use the extra ~6 weeks to complete ERP/API changes and master-data updates, then test.
- Don't treat "Ship-To GSTIN" as mandatory before 1 Aug — but be ready well ahead of it.

Source: **gst.gov.in — GSTN advisories**

GSTN Advisory extending the 20.05.2026 rollout · revised go-live 1 August 2026.

ACTION | GSTN ADVISORY · 17 JUN 2026

4 e-Invoice & EWB-by-IRN API changes for Ship-To GSTIN and EWB closure

PRODUCTION
1 Aug 2026

APPLIES TO Businesses, ERP vendors, GSPs/ASPs and private IRPs using GST APIs.

— WHAT CHANGED

- The e-Invoice API, EWB-by-IRN API and EWB Closure API are updated to carry the mandatory Ship-To GSTIN field and the voluntary EWB-closure facility.
- Where the consignee is unregistered, enter **"URP"** in the Ship-To GSTIN field. Applies to EWBs generated with an e-Invoice / via IRN, and to the closure API.
- Changes are already live in the Sandbox for testing.

— WHAT YOU SHOULD DO

- Update integrations to populate Ship-To GSTIN (or "URP"); test end-to-end in Sandbox now.
- Ensure e-Invoice / EWB / closure workflows are compliant before production go-live on 1 Aug 2026 to avoid rejections.

Source: **gst.gov.in — GSTN advisories**

GSTN Advisory dated 17 June 2026 · production rollout 1 August 2026.

ADVISORY | FCRA (REGULATION) AMENDMENT RULES, 2026

5 New definition inserted: "Key Functionary"

EFFECTIVE
22 Jun 2026

APPLIES TO FCRA-registered / applicant entities that are not individuals — companies, firms, societies, trusts.

— WHAT CHANGED

- A new clause **Rule 2(1)(ca)** defines "Key Functionary" for non-individual entities — including a director of a company and a partner in a firm (extending to other office-bearers such as trustees and society office-bearers).

— WHAT YOU SHOULD DO

- Identify your Key Functionaries against the new definition.
- Expect these details to be sought in FCRA disclosures, due diligence and compliance filings.

Source: **fcraonline.gov.in — MHA / FCRA**

FCRA (Regulation) Amendment Rules, 2026 · S.O. 3272 · dated 22 June 2026 · effective on publication.

ACTION | FCRA PENALTY TABLE AMENDMENT (S.O. 3025(E))

6 Compounding penalties for s.37 & s.35 offences made granular — and steeper

EFFECTIVE
22 Jun 2026

APPLIES TO FCRA-registered entities (cases not already disposed of as on that date).

— WHAT CHANGED — SERIAL 3 (SECTION 37)

- **3(a) Excess admin expense** (beyond the 20% limit): ₹1 lakh or 5% of the excess, whichever is higher.
- **3(b) Speculative investment:** 30% of the amount invested or ₹1 lakh (higher) **plus 100% of the returns earned**.
- **3(c) Misutilisation** (other purposes): 30% of the amount so used or ₹1 lakh, whichever is higher.

— SERIAL 4 (SECTION 35)

- **4(a) Unauthorised acceptance/use:** ₹1 lakh or 30% of the contribution received/used, whichever is higher.
- **4(b) Use without registration** (that purpose/State/UT): 30% of the amount so used or ₹1 lakh, whichever is higher.
- Compounding authority: the Director, or the Deputy Secretary in-charge of the section administering the Act.

— WHAT YOU SHOULD DO

- Tighten compliance around FCRA ss. 8, 11, 35, 37 and Rules 4 & 9(1B).
- Note the new 100% penalty on returns from speculative use — a materially higher exposure.

Source: fcraonline.gov.in — MHA / FCRA

Amendment to FCRA penalty table (orig. S.O. 3025(E), 1 Jul 2022) under s.41(1) · effective 22 June 2026.

ACTION · RELIEF | DPT-3 ADDITIONAL-FEE RELAXATION

7 DPT-3 for FY 2025-26 — additional-fee waiver extended to 31 July

FILE BY
31 Jul 2026

APPLIES TO All companies filing Form DPT-3 (Return of Deposits) for the year ended 31 March 2026.

— WHAT CHANGED

- The due date to file DPT-3 for FY 2025-26 **without additional fees** moves from 30 June to **31 July 2026**, following the 5 June 2026 fire at MCA's data centre and consequent restoration work.
- The relief is automatic — no separate application or request is needed. Filings after 31 July attract additional fees as normal.

— WHAT YOU SHOULD DO

- File DPT-3 by 31 July 2026; aim well before the date to avoid portal congestion.

Source: mca.gov.in — General Circulars

MCA relaxation dated 19 June 2026 · DPT-3 for FY ended 31 March 2026.

FOR INFORMATION | S.O. 3140(E)

8 New Development Bank specified under s.2(11)(ii) of the Companies Act

EFFECTIVE
16 Jun 2026

APPLIES TO Narrow — entities transacting with, or filing in relation to, the New Development Bank.

— WHAT CHANGED

- MCA has specified the **New Development Bank** (the BRICS bank under the 2014 Fortaleza Agreement, incl. its Annexe and future amendments) as a recognised body corporate for the purposes of s.2(11)(ii) of the Companies Act, 2013.

— WHAT YOU SHOULD DO

- Note it for any dealings, transactions or filings that involve the NDB — it now sits cleanly within the "body corporate" definition under Indian company law.

Source: mca.gov.in — Notifications

S.O. 3140(E) · dated 16 June 2026.

ON YOUR CALENDAR

Dated actions from this edition

~5 Jun 2026	Export-proceeds realisation window drops to 9 months (from 15). FEMA EXPORTERS
22 Jun 2026	FCRA "Key Functionary" definition and revised compounding-penalty table take effect. FCRA FCRA-REGISTERED ENTITIES
31 Jul 2026	Last date to file DPT-3 (FY 2025-26) without additional fees. MCA ALL COMPANIES WITH DEPOSIT DISCLOSURES
1 Aug 2026	"Ship-To GSTIN" becomes mandatory and voluntary EWB closure goes live; e-Invoice/EWB API changes move to production. GST MOST BUSINESSES · ERP/GSP

Thank you.

P G BHAGWAT LLP

NETWORK

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"The greatest obstacle to discovery is not ignorance — it is the illusion of knowledge."