



THE INSTITUTE OF
Company Secretaries of India

भारतीय कम्पनी सचिव संस्थान

IN PURSUIT OF PROFESSIONAL EXCELLENCE

Statutory body under an Act of Parliament

(Under the jurisdiction of Ministry of Corporate Affairs)

O/C

December 20, 2025

MCA:CL:DEC/2025

Ms. Deepti Gaur Mukerjee

Secretary

Ministry of Corporate Affairs

Government of India

Shastri Bhawan

New Delhi – 110 001

Received
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22-12

Subject: Functioning of MCA- 21 V3 Portal – Issues and Challenges faced by stakeholders – Reg.

Respected Madam,

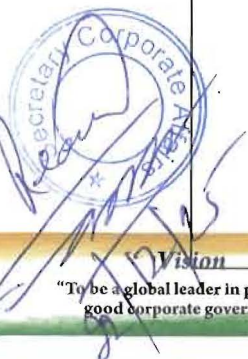
We extend our sincere gratitude to the Ministry of Corporate Affairs for granting an extension of the annual filing deadline until 31st December 2025. This considerate decision has provided much-needed relief to professionals and companies facing challenges due to technical issues on the MCA portal.

However, we respectfully wish to bring to your kind attention that persistent and widespread technical difficulties continue to be encountered on the MCA portal during the annual filing process, even after the extension, making it difficult to file the e-Forms as required under the Companies Act, 2013.

Some of these issues and concerns are outlined below for your kind consideration:

ISSUES AND CHALLENGES FACED BY PROFESSIONAL

| Form/Difficulty | Issues / Challenges |
|-----------------|---|
| AOC-4 | <ul style="list-style-type: none">• Difficulty in generating the PDF version of forms after submission.• Frequent validation errors during form processing.• SRN not appearing or being retrievable after form submission.• Incorrect company forms being downloaded.• Non-acceptance of SRN for Form ADT-1 filed earlier on the V2 portal.• Non-acceptance of SRN for Form GNL-1 filed for AGM extension.• Inability to provide reasons for changes in previous year figures when updating the form. |



Vision
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सत्यं वद। धर्मं चर। *Speak the truth. Abide by the law.*

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|-------------------|---|
| AOC-4 XBRL | <ul style="list-style-type: none">• “File Validation Failed” error message prompting users to contact the administrator.• Redirection to CSR form without allowing further progress.• Inability to upload Form AOC-4 XBRL and Form CSR-2 for FY 2024-25.• While proceeding with Form CRA-2, an error message appears stating “Validation Error” and advising to contact the administrator. |
| MGT-7 | <ul style="list-style-type: none">• Incorrect Excel file uploaded during the process.• Prompt to file Form MGT-7A without clear context.• Prefill data showing incorrect details of authorized share capital.• Excel file failing to upload successfully.• While filing Annual Return (Form MGT-7), an error message appears instructing to file MGT-7A; however, when proceeding with MGT-7A for the same company, it prompts to file MGT-7 instead. |
| MGT-7A | <ul style="list-style-type: none">• Form does not allow entry of premium amount.• Generated Excel file cannot be opened.• Dropdown for business activity is incomplete or not fully visible.• Unable to upload Excel sheets successfully.• Persistent error message: “Please try again after some time or contact support.” |

Further other common issues as notified by the professional s are mentioned below:

1. Frequent Slowdowns and Timeouts

The MCA portal continues to experience repeated slowdowns, timeouts, and performance degradation, particularly during peak filing hours between 3:00 p.m. and 8:00 p.m. It is frequently slow, unresponsive, or completely inaccessible during these periods, severely impacting productivity. Notably, even 15 days prior to the statutory due date, the MCA website has not been functioning properly, causing significant inconvenience to stakeholders.

2. Non-functional Website Access

On numerous occasions, the MCA website remains largely non-functional; even the home page fails to load, rendering filings impossible. Where access is available, filings are disrupted by frequent system errors, timeouts, and crashes, resulting in failed or incomplete submissions.

3. Additional Requirements under V-3 Portal

The V-3 portal has introduced mandatory Excel template uploads and other procedural changes, significantly increasing preparation time and complexity without commensurate facilitation. Even minor modifications necessitate saving and validating all linked forms afresh, requiring AOC-4 to be processed end-to-end each time. This has made the process unduly time-consuming, without any commensurate value addition for stakeholders.



4. Cancellation of SRNs

SRNs are being cancelled even for duly uploaded forms pending DSC affixation. Professionals are compelled to restart the entire filing process, leading to duplication of work, confusion, and avoidable delays. No clear guidance is provided regarding reasons for cancellation or corrective measures.

In view of the above, we respectfully request that necessary steps be taken to resolve the aforementioned issues at the earliest to enable smooth annual filing of e-Forms. Alternatively, we request that the due date for annual filings be extended up to 31st March 2026, thereby allowing stakeholders to complete statutory compliances.

We sincerely thank you for your continued support and consistent efforts toward promoting ease of doing business and streamlining compliance procedures. We shall be pleased to provide any further information or assistance in this regard.

Thanking you.

Yours faithfully,

(CS Dhananjay Shukla)

President

The Institute of Company Secretaries of India