



**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)

MCA:CL: SEPT/2025

September 29, 2025

Ms. Deepti Gaur Mukerjee
Secretary
Ministry of Corporate Affairs
Government of India
Shastri Bhawan
New Delhi – 110 001

Respected Madam,

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

This has reference to the transition of the compliance operations of the Ministry of Corporate Affairs from MCA-21 V2 to MCA-21 V3 platform in an attempt to embrace digital transformation and furtherance of the agenda of the Government of India's efforts to promote Ease of Doing Business (EODB) for the India Inc. Akin to every new initiative, issues and challenges are bound to creep in. We at the Institute of Company Secretaries of India are happy to partner with the Ministry in sharing these issues of the stakeholders as well as providing support wherever possible.

In this regard, we wish to submit that as informed by professionals certain technical glitches still persist and they are not able to file the e-Forms as required under the Companies Act, 2013. Some of these issues/concerns/ technical glitches are placed below for your kind consideration and timely resolution:

ISSUES AND CHALLENGES FACED BY PROFESSIONAL

Form/Difficulty	Issues / Challenges
DIR-3 KYC and DIR-3 Web KYC	Difficulty in generating OTPs in case of foreign nationals leading to non-compliance. The newly added IVR facility is also not functioning well as per the feedback received.
Incorrect Prefilled data	During the filling of form users are facing issue where details are incorrect in prefilled data. Upon inserting SRN of approved RUN form - data of some other company is being pre-filled or is incorrect.
Unable to Save and Submit	Users are unable to complete the filing process when at the last moment error occurs: "Validation Error: Submission Restricted". MCA System is not allowing to proceed further to save Form and affix DSC. Error occurs during 'Save and Submit'
Master Data not updated on Approval	After processing and submission of Form PAS-3/CRF etc., even after where the Forms are approved, the same is not reflected in the MCA master data.

Vision

"To be a global leader in promoting good corporate governance"

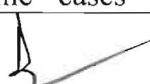
Motto

सत्यं वद। धर्मं चर। इष्टं कुरु त्रुतिः शब्देन तु त्रुतिः।

Mission

"To develop high calibre professionals facilitating good corporate governance"

Unable to upload form after affixing DSC	Even while DSC is being correctly affixed and registered on MCA portal as well, at the time of uploading the eform after affixing the DSC following error is occurring: "DSC Verification Failed"
Login Issue	• Unable to reset password: Taking the route of 'Forgot Password' where a user tries to continue by clicking on "Proceed Button" the following error message appears: "Something went wrong. Please try again later". • Profile not updated: Wherein professionals are adding their current role in the User profile the same is not updated and old role is visible in the user ID.
Unmasking/unhiding particulars of form till it is filed and submitted:	• In forms like DIR-12, DIR-3, DIR-3 KYC etc., few details in forms are filled and gets masked/or hidden during the submission process itself • This makes it impossible to verify the said particulars before filling. • Acceptance and Confirmation is being asked for users' details which have been marked with asterisks It is requested to mask/hide details only after filling or submission of the form.
Time bound Approval of Forms	• For the purpose of compliance of certain provisions and filling of forms appurtenant thereto, prior approvals of other forms is required. Such forms may not be approved even after 30 days which is usually the period within which the next form is required to be filed. • It is requested to kindly advise upon time bound approval of Forms.
Minimise use of Captcha	• In order to view basic company Master Data on MCA portal, captcha is required to be provided 2 times and in case of Director Master Data, it is required to be provided 3 times, which takes unnecessary time of the user. • It is suggested to minimise the use of captcha while using the MCA website.
Option to Save data of Forms may be provided	• Various E-forms may not be completed in one go and require multiple revisits for filling of information. • In such a situation, it becomes difficult for the professional to go back and forth with the directors or promoters of the Company to take OTP sent to them. • It is suggested to make provisions to save the data on the first OTP compliance and to process further without having to re-fill same details in the Form.
Resubmission date to be made available	• In case of forms requiring resubmission, the date of resubmission may be mentioned in the remark column. • Also, issues have been faced where Resubmission remarks are not visible.
Downloading issues	• After submission of the form, when user tries to download the said form, in some cases only attachments are getting



	downloaded & in some cases other company's forms are getting downloaded especially in case of linked forms. • This cause delay in filing forms, due to which user is unnecessarily burdened with additional fees.
Certificate generation issues	• Sometimes Certificates are not getting generated after approval of the forms & sometimes Certificates are generated with incorrect details.
Attachment size issue	• In some forms, even attachments are less than 10 MB, it throws error that "The total size of all attachments should not be more than 10 MB". System capacity need to be improved • Maximum size of List of shareholders is 300 MB but in companies there are numerous shareholders so the stakeholders are not able to provide the details of all shareholder due to the 300MB size issue
Information related issues	• In some forms, stakeholders have been asked to provide additional details like in form MGT-7 for example list of shareholders with Gender bifurcation details which are not available even with RTA's. Form is also asking for date of incorporation of Foreign Institutional Investor (FII)

We would like to bring to your attention that the Central Board of Direct Taxes (CBDT) has also extended the deadline for submitting the Tax Audit Report from September 30, 2025, to October 31, 2025.

In this regard, we would like to inform you that, as conveyed by various stakeholders, technical glitches are still persisting, which have hindered their ability to file the required forms under the Companies Act, 2013. Accordingly, we wish to submit the following points for your consideration:

1) Request for extension for the annual filling forms i.e. Form AOC-4 CFS NBFC (Ind AS), AOC-4(XBRL), AOC-4, AOC-4(CFS), AOC-4 NBFC (Ind AS), MGT-7, MGT-7A till 31.12.2025 without levying the additional fee.

2) Request for relaxation in levy of additional fee in respect of forms which are due between September 1, 2025 to December 31, 2025 in light of the continuing technical challenges.

We request you to kindly consider the aforesaid practical difficulties and provide for their early resolution.

We shall be pleased to provide any further information or clarification in this regard on hearing from your good self.

Thanking You,

Yours faithfully



(CS Dhananjay Shukla)

President

The Institute of Company Secretaries of India