



**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: 2021

April 28, 2021

Shri Rajesh Verma, IAS  
Secretary  
Ministry of Corporate Affairs  
Government of India  
Shastri Bhawan  
Dr. Rajendra Prasad Road  
New Delhi - 110001

**Subject: Request for extension of timelines due to COVID-19-reg.**

Respected Sir,

We extend our heartfelt gratitude to the Ministry of Corporate Affairs for being so considerate, proactive and always been in forefront in providing relaxations and relief to the stakeholders amidst COVID 19 pandemic.

Your goodself is kindly aware that the second wave of COVID- 19 pandemic is on the surge and the Government has imposed various restrictions in the major cities to tackle this unprecedented crisis. Several practical difficulties are being faced by the stakeholders. Developments arising due to the spread of the pandemic have again warranted the need for providing temporary relaxations in the timelines of various compliance requirements. In view of the same, we request your goodself to kindly consider providing the following relaxations in the timelines:

S.No.	Section/ Rule	Particulars	Suggestion
1	<b>Section 77 of the Companies Act, 2013 and The Companies (Registration of Charges) Rules, 2014</b>	<b>Filing of Form CHG-1/ CHG-9 and Form CHG-4</b>  Section 77 of the Companies Act, 2013 casts duty on every company creating a charge within or outside India, on its property, to register the particulars of the charge in Form CHG-1 (for other than Debentures) or Form CHG-9 (for debentures including rectification), as the case may be, with the Registrar within thirty days of its creation which may extend to maximum period of 120 days from the date of its creation with additional fee.  Rule 8 of the Companies (Registration of Charges) Rules, 2014 A company or charge holder shall within a period of three hundred days from the date of the payment or satisfaction in full of any charge registered	The last date of filing of charge related forms viz. CHG-1/CHG-9 and CHG-4 be extended till June 30, 2021.

		under Chapter VI, give intimation of the same to the Registrar in Form No.CHG-4 alongwith the fee.	
<b>2</b>	<b>Rule 10 of the Companies (Registration Offices and Fees) Rules, 2014</b>	<b>Extension of Resubmission validity of forms</b>  Rule 10 of the Companies (Registration Offices and Fees) Rules, 2014 empowers the Registrar to allow fifteen days' time to the person or company which has filed the application or e-Form or document under the Act for furnishing further information or for rectification of the defects or incompleteness or for re-submission of such application or e-form or document.	The time limit of 15 days be extended to 45 days (in view of COVID).
<b>3</b>	<b>Filing of event based forms</b>	<b>Filing of event based forms</b>  The Companies Act, 2013 requires filing of forms within specified time limit of happening of an event. The examples of such forms would be Form DIR-12 for Particulars of appointment or Changes of Directors or KMP, Form PAS-3 for allotment of securities, Form SH-8 for letter of offer for Buy Back of Securities, Form SH-7 for alteration of Capital, Form MGT-14 for filing of resolutions and agreements, Form INC-20A declaration for Commencement of Business, Form INC- 28 for filing of various orders etc.	The last date of filing these forms be extended till June 30, 2021 without any additional fee.

We hope that the above submissions would be considered favourably by the Ministry.

We shall be pleased to provide any further information in this regard on hearing from your goodself.

Thanking You,

Yours faithfully



(CS Asish Mohan)  
Secretary