



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

October 14, 2025

MCA:CL:OCT/2025

Ms. Deepti Gaur Mukerjee  
Secretary

Ministry of Corporate Affairs  
Government of India  
Shastri Bhawan  
New Delhi – 110 001

Ministry of Corporate Affairs  
Dy. No. 658 /R & I/MCA  
Date 15/10/2025

**Subject: Request for Extension of Timeline for filing of Annual E-forms under the Companies Act, 2013**

**Respected Madam,**

The Institute of Company Secretaries of India (ICSI) acknowledges that the MCA-21 V3 is a significant reform initiative under the Government's "Ease of Doing Business" and "Digital India" vision.

In this regard, we hereby submit that we have been receiving continuous communications from stakeholders highlighting difficulties being faced in filing of annual e-Forms, in addition to the difficulties mentioned in the ICSI representation dated 29.09.2025 (Copy enclosed as Annexure-I). We wish to draw your kind attention towards the following further challenges being faced by professionals: -

**1. Lengthy Annual e-filing Forms:** This year annual filing is migrated to V3 from V2 and there are changes in the layout of the Forms like AOC-4 and MGT-7 wherein the particulars from the attachment are required to be filled in the Form itself, it takes around 3 to 4 hours to fill one such form in the present scenario. During the filling of form users are facing issue where details are incorrect in prefilled data, while inserting SRN of approved Form - data of some other company is being pre-filled or is incorrect. under the offline facility the users are not able to save data, incorrect details are fetching.

**2. Portal Non-Responsiveness:** The website frequently becomes unresponsive, shows "Something went wrong" or "Request Timeout" errors, and logs out users automatically during active sessions. This makes it difficult to upload forms or complete payment.

**3. Login, Password Reset and Profile Issues:** Many professionals are unable to reset passwords or update user roles due to recurring errors ("Something went wrong. Please try again later").

**Vision**

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

**Motto**

सत्यं वद। धर्मं चर।  
Speak the truth. abide by the law.

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"To develop high calibre professionals facilitating good corporate governance"

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**4. Frequent DSC Validation Failures:** Users with valid and registered Digital Signature Certificates are unable to submit forms as the system repeatedly displays “DSC verification failed” errors, despite repeated re-registration. After verification message popup-not registered.

**5. Payment Gateway errors:** Failure of the payments or challan generation due to session timeout, which can only be resolved after raising tickets in this regard. In the process of payment of Challan while redirecting the Banks payment portal, it is unable to open the page or showing error message.

**6. Submission and Download Errors:** in the filing process the submitted forms are often not downloadable for DSC Affixation; in some cases, the Forms and attachments of other companies are displayed, causing confidentiality and data integrity concerns. Even in the filing process form are not saved details which are already filled.

**7. Portal Overload During Working Hours:** During peak hours, especially between 11 a.m. to 6 p.m., the system frequently crashes or becomes inaccessible due to heavy concurrent traffic, causing disruption in time-bound filings.

Additionally, this period coincides with the festive months of October and November, during which professionals, company staff, and compliance teams face reduced working days and limited manpower availability due to multiple national and regional holidays. These months also overlap with the statutory compliance season, further adding to the workload pressure on both professionals and the corporate community.

### **Submission**

In view of the above circumstances, and on behalf of the stakeholders, we most respectfully submit the following for the Ministry’s kind consideration:

#### **1. Extension of due dates for all annual filing forms:**

**AOC-4, AOC-4 (CFS), AOC-4 (XBRL), AOC-4 NBFC (Ind AS), AOC-4 CFS NBFC (Ind AS), DIR-12, ADT-1, MGT-7, and MGT-7A – till December 31, 2025, without levy of additional fees.**

2. General waiver of additional fees for all forms (including event-based forms) that become due for filing between September 1, 2025 and December 31, 2025, in recognition of the widespread technical disruptions and lack of portal stability.

### **Submission**

Madam, while the stakeholders remain fully committed to ensuring timely compliance and supporting the Ministry’s digital initiatives, the current system limitations have rendered compliance execution extremely difficult in practice.



We trust that the Ministry will consider this request and consider to extend the due dates suitably, in line with the relief measures extended by other regulatory bodies. We shall be pleased to provide any further inputs or demonstrations of the issues being faced, as and when desired by the Ministry.

Thanking you for your kind understanding and continued support.

Yours faithfully,

**(CS Dhananjay Shukla)**

**President**

The Institute of Company Secretaries of India

**Encl. Annexure-I-Request Letter dated 29.09.2025**