



RAM & ASSOCIATES LLP
COMPANY SECRETARIES & TRADEMARK AGENT &
IP ATTORNEYS

“FLA” RETURN UNDER FEMA

ANNUAL RETURN ON FOREIGN LIABILITIES AND ASSETS (“FLA”)

Annual Return on Foreign Liabilities and Assets (FLA) is required to be submitted by all the companies which have received FDI / or made overseas investment in any previous years(s) including the current year **on or before July 15 every year;**

Which entities are obliged to submit ?

A Company within the meaning of section 1(4) of the Companies Act, 2013;

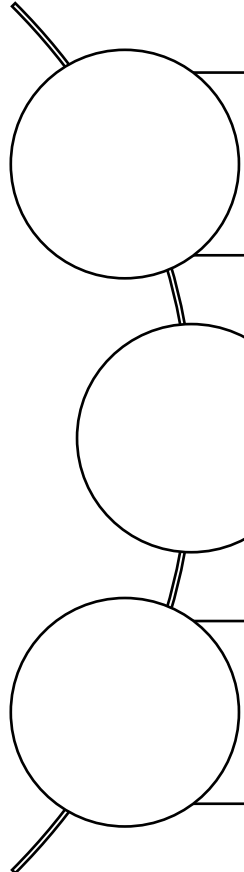
A Limited Liability Partnership (LLP) registered under the Limited Liability Partnership Act, 2008;

Others [include SEBI registered Alternative Investment Funds (AIFs), Partnership Firms, Public Private Partnerships (PPP) etc.]

What is due date of FLA ?

Entities who falls under said critieria required to submit the FLA return under FEMA 1999 based on audited/ unaudited accounts of the entity by **July 15** every year.

What information should be reported in FLA return, if balance sheet of the entity is not audited before the due date of submission?



Entities should mandatorily fill the FLA return within the due date. In case the entities do not have their audited balance sheet ready, they may fill the return with the provisional/unaudited numbers.

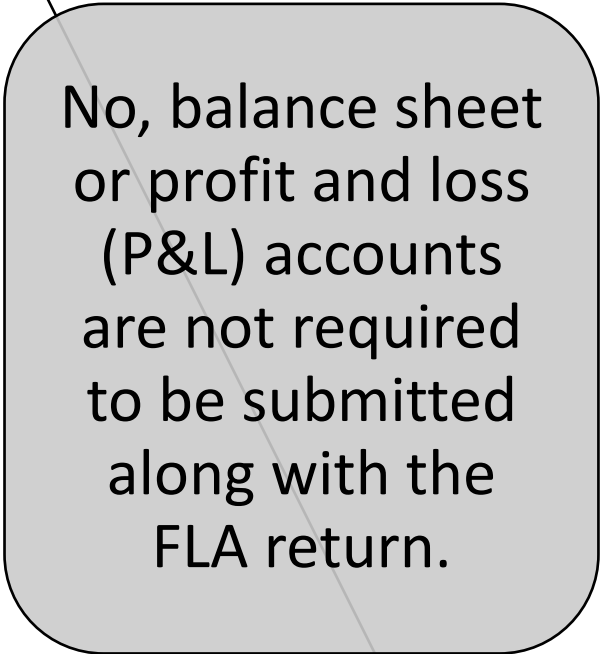
Thereafter, once the audited numbers are ready, request for revision of the previously filed return to RBI needs to be raised.

Once approved by RBI, you can revise the previously filed return with audited numbers and re-submit the same to RBI.

If an entity has not received any inward FDI / made overseas investment in the latest FY, do they need to submit the FLA return?

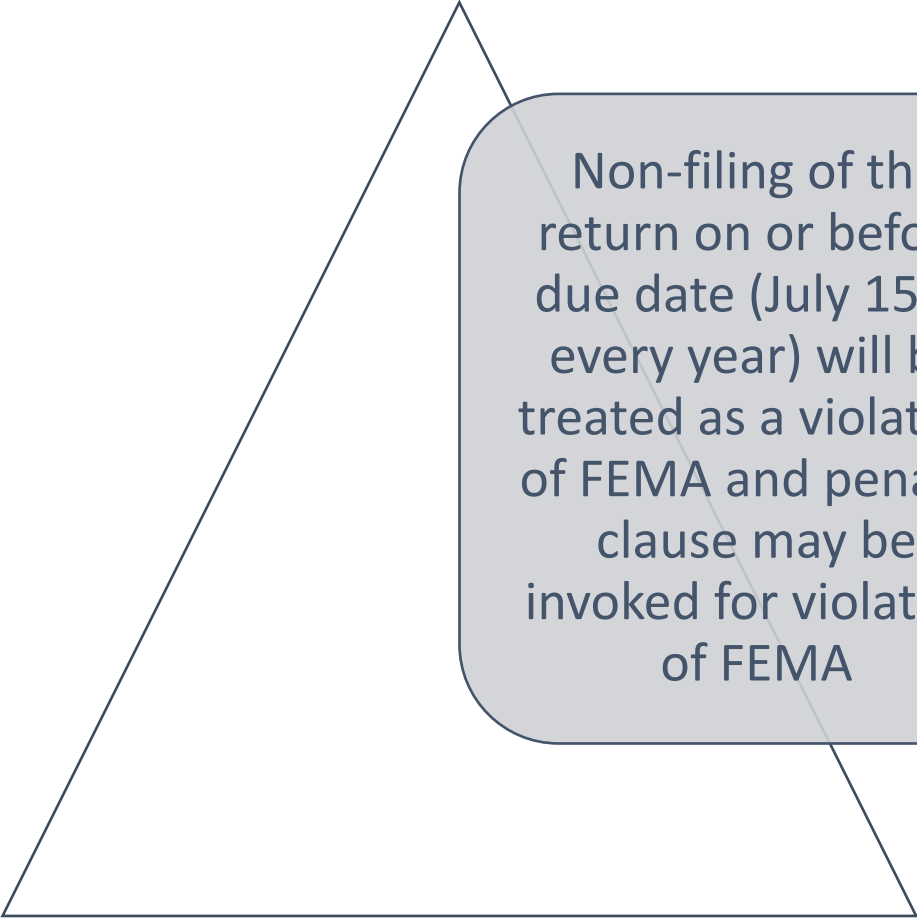
If an entity has not 'received any fresh FDI and/or ODI (overseas direct investment)' in the latest FY but has outstanding FDI and/or ODI as at end-March of that financial year, then it is required to submit their outstanding position as on March 31 in the FLA return every year by July 15

Is it required to submit any financial statements like balance sheet or P&L accounts (audited/ unaudited) along with the FLA return?



No, balance sheet or profit and loss (P&L) accounts are not required to be submitted along with the FLA return.

What will be the consequences for non filing by July 15 ?



Non-filing of the return on or before due date (July 15 of every year) will be treated as a violation of FEMA and penalty clause may be invoked for violation of FEMA

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Thank You!