

### Due date on filing Annual KYC by persons holding DIN extended till 15<sup>th</sup> September 2018 & Key issues on the KYC Compliance

While the due date of filing Annual KYC by persons holding DIN has been extended, the following note elaborates key issues relating to the KYC requirements.

As part of updating its registry, Ministry of Corporate Affairs of India (MCA) would be conducting **KYC** of all Directors of all companies annually through the new eform viz. DIR-3 **KYC**. The following are the Key Issues relating to the Annual KYC requirements:

**Applicability:** Accordingly, every person who has been allotted DIN on or before 31<sup>st</sup> March, 2018 and whose DIN is in 'Approved' status, would be mandatorily required to file form DIR-3 **KYC**

**Due Date of filing:** Extended up to 15<sup>th</sup> September 2018. (On or before 31<sup>st</sup> August, 2018 as originally notified).

**Key Issues:** With regard to the practical difficulties faced during KYC compliance the MCA has clarified the following:

- While filing the form, the Unique **Personal Mobile Number** and **Personal Email ID** would have to be mandatorily indicated.
- In case DIN holder is a **non-resident**, his foreign address & foreign number shall only be provided.
- The details would be duly verified by **One Time Password (OTP)**. The said OTP would be valid only for 5 minutes from the time it is generated. Therefore, the persons whose KYC is getting filed shall be available to provide OTP and shall be well coordinated with the directors residing outside India.
- The form should be filed using his own **Digital Signature Certificate (DSC - Class 2)**.
- Form should be duly **certified** by a practicing professional (CA/CS/CMA).
- Filing of DIR-3 **KYC** would be mandatory for **disqualified Directors** also.
- Form DIR-3 KYC, if filed within the due date of the respective financial year, no **fee** is payable. However, if filed after the due date, for DIN status 'Deactivated' a fee of Rs.5000 shall be payable.

**The payment of additional fee shall not absolve the person holding DIN, from any action which may be taken by the MCA.**

**Corporate Compliance (Secretarial) Team  
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*For any further information and assistance, kindly contact*

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