FUTURE OF INDIAN LAW – 2027

Private Limited Company Compliance Calendar

Legal position reviewed: 11 November 2026. Current small-company limits: paid-up capital not exceeding **INR 10 crore** and turnover not exceeding **INR 100 crore**, subject to exclusions. Small-company status is not the same as MSME/Udyam status.

FY 2025-26 fee-relief window: MCA General Circular No. 05/2026 (24 Oct 2026) allows AOC-4 family filings without additional fees up to **31 Dec 2026** and MGT-7/MGT-7A up to **31 Jan 2027**. It does **not** extend the AGM deadline. DIR-3 KYC is now once every third consecutive FY, due by 30 June after the third year; directors compliant at transition are next due 30 June 2028.

1. Annual calendar – FY 2026-27

Board meetings	Generally 4/year; max 120-day gap. Small company: one in each half of calendar year, at least 90 days apart.	First Board meeting within 30 days of incorporation.
AGM	Within 6 months of FY close; first AGM within 9 months of first FY close; max 15 months between AGMs.	For 31 Mar 2027 year-end, usual deadline 30 Sep 2027. OPCs exempt.
AOC-4 family	Within 30 days of AGM; OPC within 180 days from FY close.	If AGM is 30 Sep 2027, ordinary date 30 Oct 2027.
MGT-7 / MGT-7A	Within 60 days of AGM; if no AGM, 60 days from date it should have been held, with reasons.	If AGM is 30 Sep 2027, ordinary date 29 Nov 2027. Small companies/OPCs use MGT-7A.
DPT-3	Rule 16: on/before 30 June each year for specified deposits and non-deposit receipts outstanding at 31 March.	Diarise 30 Jun 2027; reconcile reportable balances with auditor.
MSME-1	Half-yearly: 31 Oct and 30 Apr where dues to micro/small suppliers remain unpaid beyond 45 days.	For Oct 2026–Mar 2027, diarise 30 Apr 2027.
DIR-3 KYC Web	Once every third consecutive FY, by 30 June after the third year; changes in mobile/email/address within 30 days.	Check each DIN on MCA V3; next periodic cycle for compliant DIN holders: 30 Jun 2028.

2. Conditional compliance flags

• **Statutory audit:** every company requires statutory audit; small-company status does not create a general audit exemption.

• **Whole-time Company Secretary:** private company with paid-up share capital of INR 10 crore or more (Rule 8A). This threshold is separate from the small-company test.

• **Secretarial audit:** check Section 204 / Rule 9 where outstanding loans or borrowings from banks/PFIs are INR 100 crore or more; this can capture a private company.

• **Auditor rotation:** check Rule 5 for a private company with paid-up share capital of INR 20 crore or more, and specified public borrowings/deposits of INR 50 crore or more; apply the exclusions.

• **Demat (Rule 9B):** private company other than a small company; Government companies excluded. Test audited financials at relevant year-end and the 18-month period. If covered, dematerialise securities and check PAS-6.

• **MSME-1:** only if the company meets the specified-company test and payments to micro/small suppliers remain pending beyond 45 days.

• **CSR:** existing Section 135 thresholds remain INR 500 crore net worth, INR 1,000 crore turnover or INR 5 crore net profit. Do not apply proposed Bill changes.

• **Event-based filings:** INC-22, DIR-12, PAS-3, CHG-1/CHG-4, SH-7 and MGT-14 only when their respective statutory triggers arise.

3. 2027 legislative watchlist

The Corporate Laws (Amendment) Bill, 2026 and JPC recommendations are proposals, not current law as at 11 November 2026. Do not implement proposed small-company threshold increases, AGM-by-video provisions, CSR changes or auditor exemptions unless enacted and commenced.

Primary references: *Companies Act, 2013 (MCA); G.S.R. 880(E) (small-company limits); G.S.R. 943(E) (DIR-3 KYC); G.S.R. 802(E) (Rule 9B demat); G.S.R. 131(E) (Rule 9B deadline); G.S.R. 13(E) (Rule 8A/secretarial audit); S.O. 2751(E) (MSME-1); MCA General Circular 05/2026; MCA V3 portal.*

Scope limitation: *Planning aid only, not a statutory form or company-specific legal opinion. Applicability depends on audited financials, Articles, shareholding, borrowings, sectoral regulation and transactions. Tax, GST, labour, FEMA, RBI and sectoral compliance need separate calendars.*