

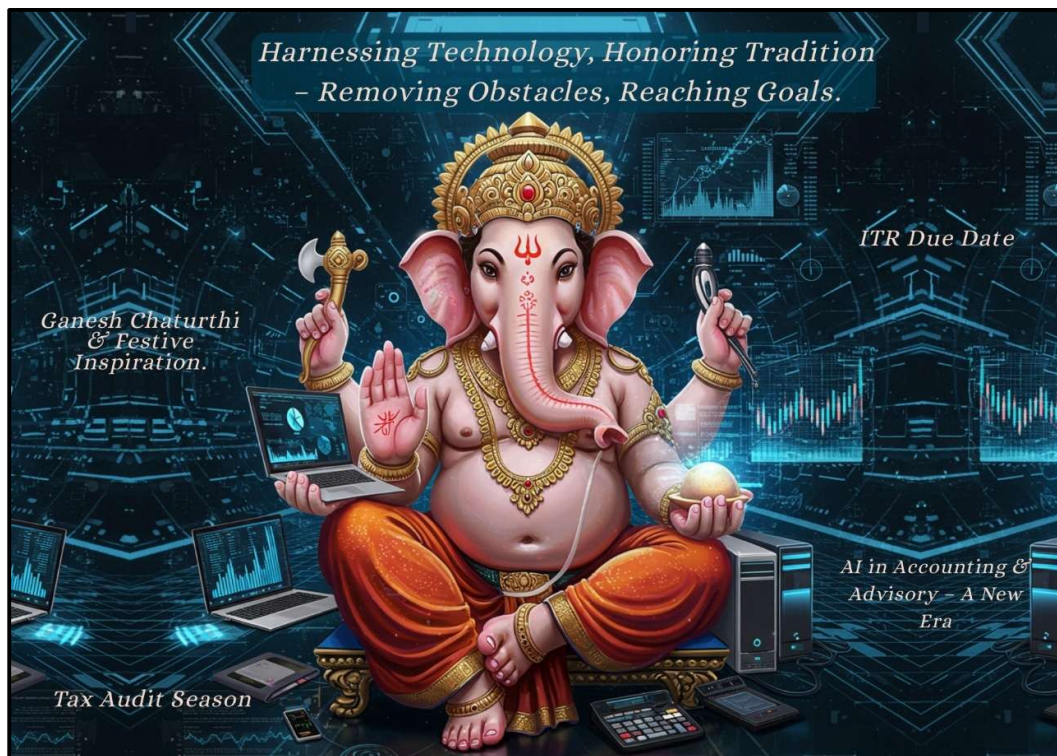
SPCM & ASSOCIATES

Chartered Accountants



SPCM
LEGAL

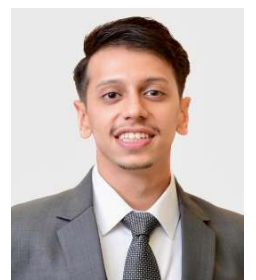
SAMĀCĀRA SEPTEMBER 2025



SAMĀCĀRA – SEPTEMBER 2025

EDITORIAL BOARD AND CONTRIBUTORS

			
CA. Suhas P. Bora	Adv. Sanket S. Bora	Adv. Abhay H. Bora	CA Disha M. Shah

			
CA. Rohan R. Nahar	CA. Siddhant A. Bora	CA. Prerna S. Bora	Mrs. Ruchi R. Bhandari

SAMĀCĀRA – SEPTEMBER 2025

Team – SPCM and Associates

CA. Suhas P. Bora
CA. Pradeep M. Katariya
CA. Chetan R Parakh
CA. Manoj R. Jain
CA. Mehul Jain
CA. Tejal A. Jain
CA. Abhay P. Katariya
CA Prerna S. Bora
Ms. Deepali R. Shah
CA Rohan R. Nahar
CA. Vidhi S. Shah
CA. Neha L. Shah
CA. Nikita Maniyar-Bajaj
CA. Siddhant A. Bora
Mrs. Ruchi R. Bhandari
CA Prerna Surana
CA Himali V. Jain
CA Pratik Chajed
CA Harsha Jain
CA Sampada Ingale
CA Riya Oswal
CA Purva Munot
CA Nishant Jain
CA Darshan Shah
CA Saurebh Kankariya
CA Sara Shaikh
Ms. Gauri Dangi
CA Sara Shaikh
CA Gajala Mulani

Team – SPCM Legal

Adv. Abhay H. Bora
Adv. Neetaa S. Bora
Adv. Sanket S. Bora
Adv. Vidhi K. Punmiya
Adv. Kirtika R. Jain
Adv. Amiya Das
Adv. Satvika Ramesh
Adv. Siddharam N. Sagare

***The greatest leader is not necessarily the one who
does the greatest things. He is the one that gets the
people to do the greatest things.***

— Ronald Reagan

SAMĀCĀRA – SEPTEMBER 2025

INDEX

SR. NO.	PARTICULARS	PAGE NO.
1.	Editorial	06-08
2.	Glimpse of Event	09-13
3.	Income Tax due date calendar for the month of September, 2025	14-16
4.	GST due dates for the month of September, 2025	17-18
5.	Tax Audit: Chapter 13 - Clause 30 of Form No. 3 CD	19-24
6.	Gist of GST Notification	25-25
7.	GST Updates	25-25
8.	Next-Gen GST Reform – A Historic Diwali Gift	26-29
9.	The Private Credit Surge: New Capital, New Valuation Paradigms	30-34

SAMĀCĀRA – SEPTEMBER 2025

EDITORIAL

Dear All,

As we welcome September, we find ourselves in the midst of an important professional cycle. The tax audit season is upon us, and with it comes the responsibility of precision, patience, and perseverance. Each assignment that we undertake this month is not just a compliance exercise, but an opportunity to reinforce the values of independence, integrity, and insight.

This year, the extended due date of 15th September 2025 for filing returns of non-corporate assesseees and those whose books of accounts are not required to be audited under Section 44AB provides some relief in managing compliance timelines. Yet, the true test lies in how effectively we utilize this time—balancing accuracy with efficiency, and ensuring that every return filed reflects the trust clients repose in us.

September is also a month of transition. From the filing season of August, we now move into a phase of deeper engagements—statutory audits, certifications, GST reconciliations, and advisory assignments. The days ahead will test our discipline and coordination, but they will also showcase the strength of our collective effort at SPCM.

A defining theme this year is the integration of Artificial Intelligence (AI) into our profession. AI is no longer a futuristic concept—it is already shaping the way businesses analyse data, regulators monitor compliance, and clients seek insights. At SPCM, we view AI not as a replacement but as a collaborator—helping us in reconciliation, document review, and predictive analytics, while freeing us to focus on higher-order judgment, advisory, and strategy. As professionals, our challenge is to balance technological efficiency with ethical responsibility.

The true value of AI emerges when combined with human wisdom, empathy, and independence.

On the macroeconomic front, the country continues its robust fiscal momentum. GST collections in August 2025 once again crossed the ₹1.80 lakh crore mark, reflecting growing formalisation of the economy, improved compliance, and resilient consumption demand. This reinforces the role of tax professionals in building a transparent and sustainable indirect tax ecosystem.

We are also proud to share some noteworthy achievements from the SPCM family this month:

- Adv. Abhay H. Bora performed the role of Moderator at the seminar on “Strategic Approach to GST Appeals” organized by MTPA and AIFTP west zone, a recognition of his growing expertise and leadership in the field of indirect tax litigation.
- Adv. Sanket S. Bora achieved a significant professional milestone with the admission of a Writ Petition before the Bombay High Court on behalf of Pune Municipal Corporation (PMC) against the Income Tax Department, involving a demand exceeding ₹400 crore—a truly landmark matter.

September also brings us closer to the festive season, beginning with Ganesh Chaturthi, the festival of new beginnings and the remover of obstacles. Just as Lord Ganesha is revered as the Vighnaharta, may we also, through our work, remove obstacles in the financial journeys of our clients, enabling growth with clarity and confidence.

This month, we also continue to draw inspiration from the discipline and reflection observed during Paryushan Parva, which concluded in August. The values of forgiveness (Kshamapana), self-restraint, and ethical conduct remain guiding lights for us even as we enter one of the busiest phases of our professional calendar.

As we step into this demanding yet rewarding month, let us remember that every signature, every report, and every opinion we issue carries the

weight of trust. Together, with discipline and determination, we can not only meet deadlines but also uphold the dignity of our profession.

We conclude with the timeless wisdom of our heritage and the vision of great leaders:

“उद्धरेदात्मनात्मानं नात्मानमवसादयेत्।

आत्मैव ह्यात्मनो बन्धुरात्मैव रिपुरात्मनः॥” (Bhagavad Gita 6.5)

“Let a man lift himself by his own self alone, and let him not lower himself; for this self alone is his friend and this self alone is his enemy.”

And with the inspiring call of **Swami Vivekananda**:

“Arise, awake, and stop not till the goal is reached.”

May this September inspire us to embrace adaptability, harness technology, and walk together with purpose towards excellence.

Thanking You,

With Warm Regards,



CA. Suhas P. Bora
Founder Partner,
SPCM and Associates,
Chartered Accountants

**GLIMPSE OF EVENTS*****CA Beyond Books – Featuring Our Founder,
CA Suhas P. Bora.******An inspiring conversation from Career Mantrana's Podcast Series:***

At SPCM & Associates, we often say: *“Beyond balance sheets and tax returns, it’s people and their journeys that define our profession.”* This month, we take pride in sharing a remarkable moment where our very own Founder & Managing Partner, CA Suhas P. Bora, was featured on Career Mantrana’s podcast—CA Beyond Books.

This insightful episode spotlighted CA Suhas P. Bora Sir’s unique journey—one that began with a childhood dream of becoming a doctor, faced unexpected setbacks, and ultimately evolved into a legacy of professional integrity, entrepreneurship, and inspiration spanning over four decades.

When Dreams Change Course – The Early Turning Point

In the podcast, CA Suhas P. Bora Sir candidly shared that he never initially dreamed of being a Chartered Accountant. His aspiration was to become a



doctor. However, a surprising dip in his 10th standard results closed the door to the science stream.

“Life redirected me towards Commerce. I didn’t choose it—it chose me. But once there, I flourished.”

With distinction in graduation and the encouragement of an inspiring professor, he set his eyes on the CA qualification. But when a job offer from Telco tempted him to opt for financial stability, the decision was tough.

A family elder discouraged the CA pursuit with the sharp comment:

“CA का result 2–5% होता है... Suhas ने CA करना मतलब पत्थर पर घी लगाना।”
(“Suhas attempting CA is like putting ghee on stone—it’s futile.”)

But it was his grandmother’s powerful belief that turned the tide:

“अगर तुम्हारा इरादा मज़बूत हो, तो पत्थर भी पिघल जाता है।”
(“If your intention is strong enough, even stone melts.”)

She asked him to resign from the job and dedicate himself to the CA journey wholeheartedly. And that’s what he did—beginning not after 12th, but after graduation, with a renewed sense of purpose.

The CA Journey – Discipline over Brilliance

CA Suhas Bora Sir, demystified the perception of the course being suitable only for top scorers.

“I wasn’t a ‘brilliant student’ after 10th. But I had a clear dream and consistent effort.”

He emphasized that the CA qualification is more than academic rigour—it’s a test of character: Patience, Focus, and Consistency.

From articleship to the CA Final, he shared how the course balances theory with practical exposure, shaping professionals who understand not only finance, but also ethics, responsibility, and client service.

A humorous personal anecdote also found its way into the episode: Before his marriage, his wife had to choose between him—then still battling CA Final—and another boy who was already a doctor. Her father jokingly remarked:

“Do you know what a CA does? One day he will just sign and get ₹5,000!”

The remark tipped the scales—and today, she proudly stands beside a Chartered Accountant who built his own legacy.

Beyond Qualification – Founding SPCM & Associates

After qualifying, CA Bora chose to build something of his own rather than seek a corporate role. And so was born SPCM & Associates—a firm grounded in professional excellence, honesty, and client trust.

“The first few years were tough. But the values we stood for—ethics, discipline, and consistency—eventually turned into long-term relationships.”

He credits much of his success not just to technical knowledge, but also to communication skills, adaptability, and continuous learning. For young CAs, he says:

“CA gives you a foundation. But your mindset and soft skills define how far you’ll rise.”

Advice to Aspiring CAs – A Roadmap, Not a Shortcut

To students considering CA as a career, his message is clear:

“Ask yourself:

- 1) Do I enjoy understanding business and money?
- 2) Am I ready to commit 4–5 years with sincerity?

If yes, CA will give you independence, respect, and stability.”

He also shared his own lesson the hard way:

“Don’t measure your success by hours studied. Study smart, not just hard.”

And to those battling fear of failure:

“Failure is a comma, never a full stop. Even average students can become excellent CAs.”

Doctor of a Different Kind – The Dream Reimagined

In a poetic closing, CA Bora shared how life, in its mysterious way, came full circle.

Though his childhood dream of becoming a doctor was derailed, he is now pursuing his PhD on “A Longitudinal Study of Funding Patterns and Financial Performance of Select Jewellers.”

“By the end of 2026, I will proudly add ‘Dr.’ before my name—not as a medical doctor, but as a Doctor of Philosophy. And that, to me, is the fulfilment of a dream.”

Final Takeaways: Quick Insights from the Podcast

- Tea or Coffee? – Tea!
- One book every commerce student must read?
 - Rich Dad Poor Dad – For money mindset
 - The Secret – For belief and vision
 - The Last Lecture – For living with purpose
- On Failing CA Once:
 - “It’s a lesson, not a loss.”

**Words to Remember:**

“Never let someone else’s opinion define your destiny. My grandmother taught me—अगर इरादा मज़बूत हो, तो पत्थर भी पिघल जाता है।”

This podcast not only celebrated a remarkable professional journey, but also reminded us that beyond qualifications lie stories of courage, commitment, and character.

Let this be a source of inspiration to all our team members, interns, and aspiring professionals. At SPCM, we don’t just practice accountancy—we build futures.

Note: You can listen to the full episode of “CA Beyond Books” featuring CA Suhas P. Bora on the Career Mantrana Podcast platform.

Our Mentor CA Suhas P. Bora sir along with CA Siddhant A. Bora had the privilege of being part of the Ganesh ji celebration with Manoj ji Chajjed at his office of Siddhi Group.



DUE DATES

**Income Tax due date calendar for the month of
September 2025:**

DATE	DUE DATE FOR
07-09-2025	Due date for deposit of Tax deducted/collected for the month of August, 2025. However, all sum deducted/collected by an office of the government shall be paid to the credit of the Central Government on the same day where tax is paid without production of an Income tax Challan.
14-09-2025	Due date for issue of TDS Certificate for tax deducted under section 194-IA, 194-IB, 194M and 194S in the month of July, 2025.
15-09-2025	- Due date for furnishing of Form 24G by an office of the Government where TDS/TCS for the month of August, 2025. - Second instalment of advance tax for the assessment year 2026-27. - Return of income for the assessment year 2025-26 for all assessee other than (a) corporate-assessee or (b) non-corporate assessee (whose books of account are required to be audited) or (c) partner of a firm whose accounts are required to be audited or the spouse of such partner if the provisions of section 5A applies or (d) an assessee who is required to furnish a report under section 92E.



DATE	DUE DATE FOR
	Note: The due date for furnishing the return of income for Assessment year 2025-26 has been extended from July 31, 2025, to September 15, 2025, vide Circular no. 06/2025, dated 27-05-2025. - Furnishing of details of attribution of capital gain taxable under section 45(4) to the capital asset remaining with the firm, AOP, or BOI after reconstitution (if the firm, AOP, or BOI is required to furnish return of income by July 31, 2025) - Furnishing of declaration by a taxpayer claiming deduction under section 80GG in respect of the rent paid for residential accommodation (if the assessee is required to submit return of income by July 31, 2025)* - Exercising the option to opt for alternative tax regime under section 115BAD by co-operative society (if assessee is required to submit return of income by July 31, 2025). - Exercising the option to opt-out from the new tax regime under section 115BAC (if assessee is required to submit return of income by July 31, 2025). - Furnishing of particulars for claiming relief under section 89 (if the assessee is required to submit return of income by July 31, 2025). - Furnishing of statement for exercising the option to claim relief under section 89A for income arising from retirement benefit account maintained in a notified country at the time of withdrawal or redemption (if the

DATE	DUE DATE FOR
	assessee is required to submit return of income by July 31, 2025)
30-09-2025	- Due date for furnishing of challan-cum-statement in respect of tax deducted under section 194-IA, 194-IB, 194M and 194S in the month of August, 2025. - Due date for filing of audit report under section 44AB for the assessment year 2025-26 in the case of a corporate-assessee or non-corporate assessee (who is required to submit his/its return of income on October 31, 2025). - Application in Form 9A for exercising the option available under Explanation to section 11(1) to apply income of previous year in the next year or in future (if the assessee is required to submit return of income on November 30, 2025). - Statement in Form no. 10 to be furnished to accumulate income for future application under section 10(21) or section 11(1) (if the assessee is required to submit return of income on November 30, 2025). - Furnishing of Audit report in Form no. 10B/10BB by a fund or trust or institution or any university or other educational institution or any hospital or other medical institution. - Furnishing report under section 115JB for computing the book profits of the company during the previous year 2024-25 (if the assessee is required to submit return of income on October 31, 2025).

**GST due dates for the month September 2025: -**

DUE DATE	RETURN	PERIOD	DESCRIPTION
10 th September	GSTR-7 (Monthly)	August'25	Summary of Tax Deducted at Source (TDS) and deposited under GST laws.
10 th September	GSTR-8 (Monthly)	August'25	Summary of Tax Collected at Source (TCS) and deposited by E-commerce operators under GST laws.
11 th September	GSTR-1 (Monthly)	August'25	Summary of outward supplies where turnover exceeds Rs.5 crore or have not chosen the QRMP scheme for the quarter of July-September 2025.
13 th September	Furnishing Invoices in IFF Facility (Quarterly)	July- September 2025	Taxpayers who have opted for the Invoice Furnishing Facility (IFF) and choose to upload B2B outward supply invoices for first two months of the quarter. The B2B invoices relating to last month of the quarter are too uploaded while filing GSTR – 1 along with B2C invoices of entire quarter.
13 th September	GSTR-6	August'25	Details of ITC received and distributed by ISD.
13 th September	GSTR-5 (Monthly)	August'25	Summary of outward taxable supplies & tax payable by a non-resident taxable person.

DUE DATE	RETURN	PERIOD	DESCRIPTION
20 th September	GSTR-3B (Monthly)	August'25	Summary of outward supplies, ITC claimed, and net tax payable for taxpayers with turnover more than Rs.5 crore in the last FY or have not chosen the QRMP scheme for the quarter of July-September 2025.
20 th September	GSTR-5A (Monthly)	August'25	Summary of outward taxable supplies and tax payable by OIDAR.

***Our greatest weakness lies in giving up. The most certain way to
succeed is always to try just one more time."***

— Thomas Edison

**INCOME TAX****TAX AUDIT: CHAPTER 13****TAX AUDIT - CLAUSE 30 OF FORM NO. 3 CD**

We have started with a series on Tax Audit u/s 44AB of the Act considering practical aspects to be taken care of for issue of the Tax Audit reports.

In chapter - 1 we discussed about the applicability of Tax Audit u/s 44AB of the Income Tax Act.

In chapter - 2 we discussed about the meaning of the terms "Sales", "Turnover" and "Gross Receipts".

In chapter – 3 we discussed about "Clauses 1 to 8A of Form No. 3 CD."

In chapter – 4 we discussed about "Clauses 9 to 12 of Form No. 3 CD"

In chapter – 5 we discussed about "Clauses 13 of Form No. 3 CD"

In chapter – 6 we discussed about "Clause 14 and 15 of Form No. 3 CD"

In chapter – 7 we discussed about "Clause 16 and 17 of Form No. 3 CD"

In chapter – 8 we discussed about "Clause 18 to 20 of Form No. 3 CD"

In chapter – 9 we discussed about "Clause 21 of Form No. 3 CD"

In chapter – 10 we discussed about "Clause 22 of Form No. 3 CD"

In chapter – 11 we discussed about " Clause 24 to 26 of Form No. 3 CD"

In chapter – 12 we discussed about " Clause 27 to 29 of Form No. 3 CD"

In the series of Article on Tax Audit provisions, we will discuss about "Clause 30 of Form No. 3 CD"

Clause 30: Details of any amount borrowed on hundi or any amount due thereon (including interest on the amount borrowed) repaid, otherwise than through an account payee cheque. [Section 69D]:

This clause is applicable to all assesseees who have borrowings on Hundi or repayment thereof, otherwise than an account payee cheque. Further requires the Tax auditor to report the compliance with the provisions of section 69D of the Act dealing with borrowing on Hundi and repayment thereof.

Provisions of Section 69D:

- The term 'Hundis' has not been defined under the Act. However, the CBDT Circular NO. 208, dated 15 November 1976 explains the scope and characteristics of the said term to be Promissory Note drawn in a vernacular language.
- Amount borrowed on Hundi or Repayment of the same (including interest) has to be made by account payee cheque.
- If not through account payee cheque, the amount borrowed or repaid will be considered as Income in the year of borrowing or repayment.

- If borrowing is taxed then repayment will not be taxed again in the year of repayment
- Account payee draft should also be treated as account payee cheque and the provisions of section 69D are not contravened if the transaction is through account payee draft.

The auditors should:

- Obtain a complete list of borrowings and repayments of hundi loans otherwise than by account payee cheques and verify the same with the books of account.
- There will be practical difficulties in verifying the loan taken or repaid on hundi by account payee cheque. In such cases, the tax auditor should verify the borrowing/repayments with reference to such evidence which may be available and in the absence of conclusive or satisfactory evidence or the auditor may obtain suitable certificate/management representation in this regard.
- It also includes reporting of the name of the parties involved, date, the amount, and other particulars may be given. The e-filing portal gives the format in which the details are to be given.
- Check the bank book and bank statements.
- Amount repaid shall include interest paid on the same.

Clause 30A: Details about “Primary Adjustments” in transfer pricing to be reported as per Section 92CE:

This clause has been added to Form 3CD w.e.f. 20th August 2018. If any primary adjustment to the transfer price has been made as per section 92CE(1) of the Act, then the following details need to be given in this clause.

- Under which clause of section 92CE(1) primary adjustment is made?
 - Suo motu by the assessee in his ITR;
 - By the Assessing Officer and has been accepted by the assessee;
 - Determined by an advance pricing agreement entered into by the assessee u/s 92CC;
 - As per the safe harbour rules framed u/s 92CB; or
 - Arising as a result of resolution of an assessment by way of the mutual agreement procedure under an agreement entered into u/s 90 or s. 90A for avoidance of double taxation, the assessee shall make a secondary adjustment.
- Amount of primary adjustment.
- Whether the excess money available with the associated enterprise is required to be repatriated to India as per the provisions of section 92CE(2)?
- If yes, whether the excess money has been repatriated within the prescribed time. The due date is 90 days from due date of filing of ITR.
- If no, the amount of imputed interest income on such excess money which has not been repatriated within the prescribed time.

This clause has been necessitated on account of the section 92CE which was inserted into the Statute w.e.f. AY 2018-19.

Clause 30B: Limitation of interest deductions for borrowings from an Associated Enterprise up to 30% of EBITDA is to be furnished:

As per Section 94B(1) of the Act, if an Indian Company or a Permanent establishment of a foreign company in India incurs any expenditure by way of interest or of similar nature exceeding Rs. 1 Crore which is

deductible in computing income chargeable under the head 'Profits and Gains of Business or Profession' in respect of any debt issued by a non-resident, being an associated enterprise of such borrower, the interest shall not be deductible in computation of income under the said head to the extent that it exceeds 30% of EBITDA. The Form gives an additional clause to disclose the following:

- Amount of expenditure by way of interest or of similar nature incurred.
- Earnings before interest, tax, depreciation and amortization (EBITDA) during the previous year.
- Amount of expenditure by way of interest or of similar nature which exceeds 30% of EBITDA.
- Details of interest expenditure brought forward as per section 94B (4).
- Details of interest expenditure carried forward as per section 94B (4).

Clause 30C: Details of Impermissible Avoidance Arrangement to be furnished as referred to in Section 96:

This clause has been added to Form 3CD w.e.f. 20th August 2018. If an assessee has entered into an Impermissible Avoidance Arrangement (GAAR) as defined in section 96 of the Act, then the following details needs to be furnished in clause 30C of the Form:

- Nature of the impermissible avoidance arrangement.
- Amount of tax benefit in the previous year arising, in aggregate, to all the parties to the arrangement.

Rules 10U to 10UF have been prescribed by the Central Government in respect of GAAR. As per Rule 10U, GAAR provisions are not applicable to (hence, not reportable in this clause):

- An arrangement where the tax benefit in the relevant assessment year does not exceed Rs. 3 crores in aggregate to all the parties to the arrangement in the relevant assessment year. (In computing such tax benefit, interest and penalty are not to be considered).
 - In case of a foreign institutional investor (FII) who has not availed of any tax treaty benefits and has invested in securities (listed/unlisted) with the prior permission of the competent authority in accordance with the SEBI (Foreign Institutional Investor) Regulations, 1995 and such other regulations as may be applicable.
 - Person being a Non-resident, in relation to investment made by him by way of offshore derivative instruments or otherwise in FIIs
 - Income accruing or arising to any person from transfer of investments made prior to 1st April 2017, as Rule 10U(2) provides that the GAAR provisions shall apply in respect of tax benefit obtained from the arrangement after 1st April 2017, irrespective of when the arrangement was entered into.
-

***Persistence and resilience only come from having
been given the chance to work through difficult
problems.***

— Gever Tulley

GST

Gist of GST Notification

Notification No.	Date	Subject / Highlights
12/2025-Central Tax	20-08-2025	CBIC extend the due date for furnishing FORM GSTR-3B for the month of July, 2025 upto 27.08.2025, for the taxpayers registered in Mumbai (City), Mumbai (sub-urban), Thane, Raigad and Palghar districts of Maharashtra.

GST Updates

System Enhancement for Order-Based Refunds.

The new system changes address this by allowing refunds for any minor head with a negative balance, regardless of the overall Demand ID status or balance. When a refund is claimed, the system will now automatically populate only the negative balances in the refund application form (Form RFD-01).

Additionally, the system now suggests the most recent demand order number associated with a negative balance, and tooltips have been added to guide users in entering the correct order number and Demand ID.

Special Feature: Next-Gen GST Reform – A Historic Diwali Gift.

A Diwali Gift from the Government of India

The Government has announced the Next-Gen GST Reform – a landmark step aimed at reducing the cost of living, boosting demand, and simplifying compliance. With reductions in GST rates across daily essentials, healthcare, education, agriculture, automobiles, and electronics, this reform is a true festive gift to the nation.

Everyday Essentials Become Cheaper

- Hair oil, shampoo, toothpaste, soap, shaving cream → 18% → 5%
- Dairy products (butter, ghee, cheese, spreads) → 12% → 5%
- Pre-packaged snacks, namkeens, bhujia → 12% → 5%
- Baby feeding bottles, diapers, napkins → 12% → 5%
- Utensils, sewing machines → 12% → 5%

Relief for Farmers & Agriculture

- Tractor tyres & parts → 18% → 5%
- Tractors → 12% → 5%
- Bio-pesticides & micro-nutrients → 12% → 5%
- Drip irrigation systems & sprinklers → 12% → 5%
- Agricultural machinery → 12% → 5%

Healthcare Made Affordable

- Health & life insurance → 18% → Nil
- Thermometers → 18% → 5%
- Medical oxygen → 12% → 5%

- Diagnostic kits, glucometers, test strips → 12% → 5%
- Corrective spectacles → 12% → 5%

Education Essentials Exempted

- Maps, charts, globes → 12% → Nil
- Pencils, sharpeners, crayons → 12% → Nil
- Exercise books, notebooks → 12% → Nil
- Erasers → 5% → Nil

Automobiles Become Affordable

- Small cars (Petrol/LPG/CNG <1200cc) → 28% → 18%
- Diesel cars (<1500cc) → 28% → 18%
- Three-wheelers → 28% → 18%
- Motorcycles (350cc & below) → 28% → 18%
- Transport vehicles → 28% → 18%

Lower GST on Electronics

- Air Conditioners → 28% → 18%
- Televisions (above 32") → 28% → 18%
- Monitors & projectors → 28% → 18%
- Dishwashers → 28% → 18%

Process Reforms – Better Compliance, Faster Refunds

- a) Automatic registration within 3 working days.
- b) System-based refunds with risk evaluation.
- c) Benefits extended to zero-rated & inverted duty supplies.

SPCM Insights & Commentary

- 1) Working Capital Relief – Lower GST on inputs eases liquidity.
- 2) Insurance Sector Boost – Premiums cheaper, higher adoption expected.
- 3) Simplified Compliance – MSMEs benefit from quicker registration & refunds.
- 4) Education Sector – Schools & suppliers should update pricing.
- 5) Automobile Dealers – Align inventory & pricing with reduced tax slabs.
- 6) Sectoral Opportunities – Agriculture, healthcare, and electronics to see demand rise.
- 7) Strategic Planning – Businesses must re-align contracts & ITC management.

Action Points Checklist for Businesses:

- Update invoices, contracts, and agreements with new GST rates.
- Revise ERP/Accounting software tax codes.
- Recalculate selling prices to transparently pass on tax benefits.
- Review Input Tax Credit position & refund eligibility.
- Communicate revised pricing to customers and suppliers.
- Re-align sales & procurement strategies in impacted sectors.

Conclusion:

The Next-Gen GST Reform is more than just a tax rate cut – it is a comprehensive push for affordability, simplification, and growth. Everyday items will cost less, businesses will see smoother compliance, and the economy will gain a strong consumption boost.

As your trusted advisors, we at SPCM are here to guide you in implementing these reforms, ensuring compliance, and identifying opportunities for your business.

This Diwali, the brightest light is the promise of a simpler, fairer, and growth-oriented GST regime!

***You are never too old to set another goal or to
dream a new dream.***

— C.S. Lewis

FINANCE AND VALUATIONS

The Private Credit Surge: New Capital, New Valuation Paradigms

What is Private Credit?

Private credit refers to non-bank lending provided directly to businesses by private funds, asset managers, or institutional investors.

Unlike traditional bank loans or public bond issuances, private credit operates in the unlisted, negotiated debt market.

Key features include:

- Flexibility: Structures can be tailored with covenants, repayment schedules, or equity kickers.
- Speed: Capital is deployed faster than traditional bank channels.
- Yield Premium: Investors demand higher returns to compensate for illiquidity and bespoke risk.
- Hybrid Nature: It sits between debt and equity — offering debt-like seniority but equity-like risk-return profiles in many cases.

Globally, private credit has grown into a multi-trillion-dollar asset class. For India, it is emerging as an alternative capital pillar as banks retrench and capital markets remain selective.

Private Credit vs. Venture Capital: Key Distinctions

Aspect	Private Credit	Venture Capital
Instrument	Debt-like (loans, structured credit, mezzanine)	Equity (minority stakes, convertible preference shares)
Return Expectation	Fixed interest/IRR + downside protection	Equity upside, high-risk high-reward multiples
Seniority in Capital Structure	Senior or mezzanine – repayment priority over equity	Subordinate to all debt – residual claim only
Risk Profile	Lower volatility, protected by covenants & collateral	High volatility, dependent on business success/scalability
Investor Objective	Stable yield, capital preservation, moderate upside	Growth exposure, disruptive upside, potential 10x+ returns
Typical Use Case	Refinancing, growth capital for mature firms, rescue financing	Seed to growth-stage funding for startups & scale-ups

In simple terms:

- Private credit investors get steady returns with downside buffers.
- Venture capitalists bet on explosive upside with risk of total loss.

The Surge in India's Private Credit Market

The Indian private credit market is experiencing a record-breaking year:

- Deal Volumes: H1 2025 saw USD 9 billion in private credit deals — a 53% jump over H1 2024.
- Market Size: From USD 11.9 billion in 2025, the market is projected to reach USD 27.5 billion by 2031, at a CAGR of ~12.7%.
- Landmark Transactions: The USD 3.1 billion refinancing by Shapoorji Pallonji Group set new benchmarks for large-scale structured private credit.
- Sector Focus: Real estate, infrastructure, and mid-market corporates are the biggest beneficiaries, where traditional bank lending has tightened.

Regulatory Support is amplifying the momentum:

- SEBI has mandated use of Electronic Book Platforms (EBP) for all private debt issues above ₹20 crore, boosting transparency.
- RBI has relaxed provisioning norms on infrastructure lending (5% → 1%), improving the attractiveness of private capital for long-gestation projects.

Examples of Private Credit Platforms in India

Private credit is no longer restricted to global giants like Apollo Global, Blackstone, or KKR. India has seen the rise of dedicated private credit platforms, including:

- Edelweiss Alternatives (Edelweiss Asset Management) – Among the largest domestic platforms, managing multiple credit funds targeting stressed assets and growth financing.

- Kotak Private Credit – Focuses on structured credit for mid- to large-sized corporates.
- Vivriti Capital – Provides private credit to SMEs and mid-market companies, often via securitized structures.
- Northern Arc Capital – Specializes in structured debt for microfinance, NBFCs, and impact-driven enterprises.
- Global Entrants – International players like KKR Credit, Apollo Credit, and Oaktree Capital have been increasingly active in Indian private debt transactions.

Valuation Implications

For valuation professionals, this surge cannot be ignored. Private credit transactions affect how we benchmark risk, cost of capital, and deal comparables.

- 1) Risk-Adjusted Discounting – Private credit instruments carry higher yields due to illiquidity and covenant risk. WACC models should account for this “alternative debt premium.”
- 2) Comparables for M&A & Funding – Large private credit deals (like the SP refinancing) create fresh reference points for enterprise cost of funds. These comparables are invaluable in structuring valuations for mid-market firms.
- 3) Disclosure & Compliance – With SEBI mandating EBPs, valuation reports must incorporate market-discovered pricing benchmarks. Advisors must explicitly document private credit terms when used in valuation inputs.

Conclusion: A New Capital Era for India

1. Private credit is no longer a side note — it is reshaping how Indian businesses finance growth.
 2. For promoters, it offers a new source of flexible capital; for investors, a yield-rich alternative; and for valuation professionals, a new lens through which to benchmark risk and value.
 3. And while venture capital chases exponential growth, private credit is powering stability, structure, and scale.
 4. Ignoring private credit in 2025 is like ignoring venture capital in 2015 — not an option.
 5. The question is no longer “what is private credit?” — it is “how will it redefine valuation benchmarks in India’s next growth cycle?”
-

THANK YOU!

DISCLAIMER

While every care has been taken in the preparation of this “Samācāra” to ensure its accuracy at the time of publication, SPCM & Associates and/or SPCM Legal assumes no responsibility for any errors which despite all precautions, may be found therein. Neither this alert nor the information contained herein constitutes a contract or will form the basis of a contract. The material contained in this document does not constitute/ substitute professional advice that may be required before acting on any matter. All images, pictures, logos and trademarks appearing in the “Samācāra” are property of their respective owners.