



3rd June, 2020/6215

Smt. Nirmala Sitharaman

Hon'ble Minister of Finance & Corporate Affairs,
Govt. of India

A-Wing, Shastri Bhawan, Rajendra Prasad Road
New Delhi-110 001

Sub: Filing of Form DIR 3 KYC.

Dear Madam,

Greetings from Gujarat Chamber of Commerce & Industry (GCCI).

Gujarat Chamber of Commerce & Industry [GCCI] founded in 1949, is the apex trade and industry body of Gujarat which works to create and sustain an environment conducive to the growth of industry and trade in Gujarat. With more than 4000 direct members including more than 200 regional chambers and associations of Gujarat, GCCI serves the interests of all sectors of trade & industry.

Madam, filing of form DIR 3 as a part of KYC is mandatory for each year accordingly to rule 12A of the companies [Appointment and Qualification of Directors] Rules, 2014.

We have been receiving representation from our members that this requirement in itself is not necessary unless there is a change of any of the Directors and only for that Director such information should be mandatory to be furnished. For small company following under the definition of MSME, this annual compliance is an unnecessary and uncalled for financial burden.

Failing to comply is attracting penalty of Rs.5000 which also is very high.

We therefore request you to kindly examine this provision and replace it by furnishing the details only for those Director(s) who are changed and no such details be asked for the continuing Director(s).

Durgesh V. Buch
President

Natubhai Patel
Sr. Vice President

Bhargav Thakkar
Vice President

Sanjeev Chhajer
Secretary

Dilip M. Padhya
Secretary (R)

Pathik S. Patwari
Treasurer



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This small correction in law will go a long way towards Ease of Doing Business.

Thanking you and with regards,

Yours sincerely,

Durgesh V. Buch
President

C.C.

Shri Nitin Gadkari

Hon'ble Minister of Road Transport and Highways & MSMEs
Govt. of India
Transport Bhawan, Sansad Marg,
NEW DELHI-110001

Shri Injeti Srinivas

Ministry of Finance & Corporate Affairs,
Govt. of India
A-Wing, Shastri Bhawan, Rajendra Prasad Road
New Delhi-110 001

Shri A.K. Sharma

Secretary to the Government of India
Ministry of Road Transport and Highways & MSMEs
Govt. of India
Transport Bhawan, Sansad Marg,
NEW DELHI-110001

Sh. M.K. Sahu (ROC Ahmedabad)

Registrar of Companies
ROC Bhavan, Opp. Rupal Park Society,
Behind Ankur Bus Stop,
Naranpura, Ahmedabad-380013

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Sr. Vice President

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