

MCA Public notice - Mandatory filing of Form IEPF-1A with prescribed excel template under Rule 5 (4A) of the IEPF (Accounting, Audit, Transfer and Refund) Rules, 2016. – 31st July 2025

1. Background and Legal Context

IEPF Authority has reiterated the compliance requirement under Rule 5(4A) of the IEPF (Accounting, Audit, Transfer and Refund) Rules, 2016, inserted via Notification G.S.R. 571(E) dated 14th August 2019, effective from 20th August 2019. As per this rule, companies that had transferred amounts to the IEPF under Section 205C of the Companies Act, 1956 or Section 125(2) of the Companies Act, 2013, but had filed the corresponding Form IEPF-1A or IEPF-1 respectively in any format other than the prescribed Excel template.

2. Applicability and Compliance Requirements

The requirement to file Form IEPF-1A applies in the following cases:

- Where companies have transferred amounts covered under clauses (a) to (d) of Section 205C of the Companies Act, 1956 but failed to submit the related statement or submitted it in a non-Excel format; or
- Where Form IEPF-1 under clauses (a) to (n) of Section 125(2) of the Companies Act, 2013 has been filed post the notification date in any format other than the mandated Excel template.

3. Observations by the Authority

Despite sufficient time and repeated communications, the Authority has observed that over 3,000 companies (including 1,758 listed and 1,103 unlisted entities) remain non-compliant. Furthermore, more than 31,000 SRNs relating to Form IEPF-1 and IEPF-7 have been submitted in non-compliant formats. This has resulted in significant operational challenges for IEPFA, including difficulties in reconciling transferred amounts and resolving investor claims, thereby impacting investor protection outcomes.

4. Final Compliance Window and Process

As part of the migration to the MCA21 V3 portal, IEPFA has granted a final compliance window of 30 days from the date of the public notice, i.e., on or before 30th August 2025.

- Companies are required to submit Form IEPF-1A along with the prescribed Excel template during this window.
- The list of affected SRNs and the relevant Excel templates shall be shared directly with the Nodal Officers of respective companies via their registered email addresses.
- This initiative is aimed at streamlining data processing and accelerating the disbursement of legitimate investor claims.

5. Consequences of Non-Compliance

Failure to comply with the filing requirement by the final deadline of 30.08.2025 shall invite regulatory action under the applicable provisions of the Companies Act, 2013. Companies are therefore advised to treat this as a high-priority compliance matter and take immediate corrective action.

6. Advisory to Stakeholders

All companies and relevant stakeholders are directed to review their historical filings under the IEPF framework and ensure that any filings made in a format other than the prescribed Excel template are duly rectified by filing Form IEPF-1A within the stipulated time. Internal coordination with Nodal Officers and prompt action through the MCA21 V3 portal are essential for ensuring timely compliance and avoiding penal consequences.