## <u>Clause by Clause Comparison of the Reporting Companies (Auditor's Report) Order 2020 vis a vis</u> <u>Previous CAROs</u>

CARO	2003	2015	2016	2020
ISSUE DATE	June 2003	10 April,2015	29 March, 2016	25 <sup>th</sup> February,2020
EFFECTIVE DATE	July 2003	Audits of FY 2014-15 and onwards	Audits of FY 2015-16 and onwards	Audits of FY 2019-20 and onwards
Para 3 – (clause by clause)	(i) (a) whether the company is maintaining proper records showing full particulars, including quantitative details and situation of fixed assets;	showing full particulars, including quantitative details	(i)(a) whether the company is maintaining proper records showing full particulars, including quantitative details and situation of fixed assets;	(i)(a) (A) whether the company is maintaining proper records showing full particulars, including quantitative details and situation of Property, Plant and Equipment;  (B) whether the company is maintaining proper records showing full particulars of intangible assets;
	(b) whether these fixed assets have been physically verified by the management at reasonable intervals; whether any material discrepancies were noticed on such verification and if so, whether the same have been properly dealt with in the books of account;	verified by the management at reasonable intervals; whether any material discrepancies were noticed on such verification and if so, whether the same have been	(b) whether these fixed assets have been physically verified by the management at reasonable intervals; whether any material discrepancies were noticed on such verification and if so, whether the same have been properly dealt with in the books of account;	(b) whether these Property, Plant and Equipment have been physically verified by the management at reasonable intervals; whether any material discrepancies were noticed on such verification and if so, whether the same have been properly dealt with in the books of account;
	(c) if a substantial part of fixed assets have been disposed off during		(c) whether the title deeds of immovable properties are held in the name of the company. If not,	(c) whether the title deeds of all the immovable properties. (other than properties where the Company is the lessee and the lease agreements are

affe	the year, whether it has affected the going concern;				provide the details thereof;			duly executed in favour of the lessee) disclosed in the financial statements are held in the name of the company. If not, provide the details thereof in the format below;						
									Descripti on of property	Gross carrying value	Held in the name of	Whether promote r, director or their relative or employe e	Period held – indicate range, where appropri ate	Reason for not being held in the name of the compan y*
									-	-	-	-	-	*also indicat e if in disput e
									Plant and or intang whether a Registe change i	d Equipn ible asse the reva ered Valu s 10% or value of	nent (incl ts or botl luation is er; specif more in each cla	uding Right during to based on figure of the amount of the aggress of Pr	ght of Us the year a n the val ount of o regate o	Property, se assets) and, if so, uation by change, if f the net Plant and
									are pend Benami (Prohibit	ding aga property ion) Act, her the C	inst the under t 1988 and Company	company he "Bena I Rules ma has appro	for hol ami Tra ade there opriately	itiated or ding any nsactions eunder; if disclosed
(ii)	(a) wh	nether	(ii)	(a) whether	physical	(ii)	whether	physical	(ii) (a) w	hether p	hysical ve	erification	of inver	ntory has

physical verification of inventory has been conducted at reasonable intervals by the management;	been conducted at	verification of inventory has been conducted at reasonable intervals by the management and whether any material discrepancies were noticed and if so, whether they have been properly dealt with in the books of account;	been conducted at reasonable intervals by the management and whether, in the opinion of the auditor, the coverage and procedure of such verification by the management is appropriate; whether any discrepancies of 10% or more in the aggregate for each class of inventory were noticed and if so, whether they have been properly dealt with in the books of account;
(b) are the procedures of physical verification of inventory followed by the management reasonable and adequate in relation to the size of the company and the nature of its business. If not, the inadequacies in such procedures should be reported;	management reasonable and adequate in relation to the size of the company and the nature of its business. If not, the inadequacies in such procedures should be		(b) whether during any point of time of the year, the Company has been sanctioned working capital limits in excess of Rs. 5 crores, in aggregate, from banks or financial institutions on the basis of security of current assets; whether the quarterly returns or statements filed by the Company with such banks or financial institutions are in agreement with the books of account of the Company. If not, give details.
(c) whether the company is maintaining proper records of inventory and whether any material discrepancies were noticed on physical verification and if so, whether the same have been properly dealt with in the books of account;	maintaining proper records of inventory and whether any material discrepancies were noticed on physical verification and if so,		

(iii) (a) has the company granted any loans, secured or unsecured to companies, firms or other parties covered in the register maintained under section 301 of the Act. If so, give the number of parties and amount involved in the transactions; and	(iii) whether the company has granted any loans, secured or unsecured to companies, firms or other parties covered in the register maintained under section 189 of the Companies Act. If so,  (a) whether receipt or the principal amount and interest are also regular; and	(iii) whether the company has granted any loans, secured or unsecured to companies, firms, Limited Liability Partnerships or other parties covered in the register maintained under section 189 of the Companies Act, 2013. If so,  (a) whether the terms and conditions of the grant of such loans are not prejudicial to the company's interest;	made investments in, provided any guarantee or security or granted any loans or advances in the nature of loans, secured or unsecured to companies, firms, Limited Liability Partnerships or any other parties. If so,  (a) whether during the year the company has provided loans or provided advances in the nature of loans, or stood guarantee, or provided security to any
(b) whether the rate of interest and other terms and conditions of loans given by the company, secured or unsecured, are prima facie prejudicial to the interest of the company; and	(b) if overdue amount is more than rupees one lakh, whether reasonable steps have been taken by the company for recovery of the principal and interest;	(b) whether the schedule of repayment of principal and payment of interest has been stipulated and whether the repayments or receipts are regular;	(b) whether the investments made, guarantees provided, security given and the terms and conditions of the grant of all loans and advances in the nature of loans and guarantees provided are not prejudicial to the company's interest;

(c) whether receipt of the principal amount and interest are also regular; and	(c)if the amount is overdue, state the total amount overdue for more than ninety days, and whether reasonable steps have been taken by the company for recovery of the principal and interest;	(c) in respect of loans and advances in the nature of loans whether the schedule of repayment of principal and payment of interest has been stipulated and whether the repayments or receipts are regular;
(d) if overdue amount is more than rupees one lakh, whether reasonable steps have been taken by the company for recovery of the principal and interest;		(d) if the amount is overdue, state the total amount overdue for more than ninety days, and whether reasonable steps have been taken by the company for recovery of the principal and interest;
(e) has the company taken any loans, secured or unsecured from companies, firms or other parties covered in the register maintained under section 301 of the Act. If so, give the number of parties and the amount involved in the transactions; and		(e) whether any loan or advance in the nature of loan granted which has fallen due during the year, has been renewed or extended or fresh loans granted to settle the overdues of existing loans given to the same parties; If so, specify the aggregate amount of such dues renewed or extended or settled by fresh loans and the percentage of the aggregate to the total loans or advances in the nature of loans granted during the year. [Not applicable to companies whose principal business is to give loans];
(f) whether the rate of interest and other terms and conditions of loans taken by the company, secured or unsecured, are prima facie prejudicial to the interest of the company;		(f) whether the Company has granted any loans or advances in the nature of loans either repayable on demand or without specifying any terms or period of repayment; if so, specify the aggregate amount, percentage thereof to the total loans granted, aggregate amount of loans granted to Promoters, related parties as defined in clause (76) of section 2

and			of the Companies Act, 2013
(g) whether pays of the principal am and interest are regular.	unt		
(iv) is there adequate internal co system commensuments with the size of company and the nation of its business, for purchase of inversionant fixed assets and the sale of goods services. Whether the a continuing failure correct major weakned in internal consystem.	cate commensurate with the size of the company and the nature of its business, for the purchase of inventory and fixed assets and for the sale of goods and services. Whether there is a continuing failure to correct major weaknesses in internal	investments, guarantees, and security whether provisions of section 185 and 186 of the Companies Act, 2013 have been complied with. If not, provide the details thereof.	iv) in respect of loans, investments, guarantees, and security whether provisions of section 185 and 186 of the Companies Act, 2013 have been complied with. If not, provide the details thereof.
v) (a) whether particulars of contract arrangements referred in section 301 of the have been entered in register required to maintained under section; and	the directives issued by the Act Reserve Bank of India and the provisions of sections 73 to be 76 or any other relevant	accepted deposits, whether the directives issued by the Reserve Bank of India and the provisions of sections 73 to 76 or any other relevant provisions of the Companies Act, 2013 and the rules framed thereunder, where applicable, have been complied with? If not, the nature of such contraventions be stated; If an order has been passed by	(v) in respect of deposits accepted by the Company or amounts which are deemed to be deposits, whether the directives issued by the Reserve Bank of India and the provisions of sections 73 to 76 or any other relevant provisions of the Companies Act, 2013 and the rules framed thereunder, where applicable, have been complied with? If not, the nature of such contraventions be stated; If an order has been passed by Company Law Board or National Company Law Tribunal or Reserve Bank of India or any court or any other tribunal, whether the

	has been passed by Company Law Board or National Company Law Tribunal or Reserve Bank of India or any court or any other tribunal, whether the same has been complied with or not?	Company Law Tribunal or Reserve Bank of India or any court or any other tribunal, whether the same has been complied with or not?	same has been complied with or not?
(b) whether transactions made in pursuance of such contracts or arrangements have been made at prices which are reasonable having regard to the prevailing market prices at the relevant time;  (This information is required only in case of transactions exceeding the value of five lakh rupees in respect of any party and in any one financial year).			
(vi) in case the company has accepted deposits from the public, whether the directives issued by the Reserve Bank of India and the provisions of sections 58A, 58AA or any other	` '	(vi) whether maintenance of cost records has been specified by the Central Government under sub-section (1) of section 148 of the Companies Act, 2013 and whether such accounts and records have been so made and	(vi) whether maintenance of cost records has been specified by the Central Government under sub- section (1) of section 148 of the Companies Act and whether such accounts and records have been so made and maintained.

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relevant provisions of the	maintained;	maintained.	
Act and the rules framed			
there under, where			
applicable, have been			
complied with. If not, the			
nature of contraventions			
should be stated; If an			
order has been passed by			
Company Law Board or			
National Company Law			
Tribunal or Reserve Bank			
of India or any Court or			
any other Tribunal			
whether the same has			
been complied with or			
not?			
( ) )	( 11) ( ) ( )		
(vii) in the case of		(vii) (a) whether the	(vii) (a) whether the company is regular in depositing
listed companies and/or	regular in depositing	company is regular in depositing	undisputed statutory dues including Goods and
other companies having a	undisputed statutory dues	undisputed statutory dues	Service Tax, provident fund, employees' state
paid-up capital and	including provident fund,	including provident fund,	insurance, income-tax, sales-tax, service tax,
reserves exceeding Rs.50	employees' state insurance,	employees' state insurance,	duty of customs, duty of excise, value added tax,
lakhs as at the	income-tax, sales-Lax, wealth	income-tax, sales-tax, service tax,	cess and any other statutory dues to the
commencement of the	tax, service tax, duty of	duty of customs, duty of excise,	appropriate authorities and if not, the extent of
l C			
financial year concerned,	customs, duty of excise,	value added tax, cess and any	the arrears of outstanding statutory dues as on
or having an average	customs, duty of excise, value added tax, cess and any	value added tax, cess and any other statutory dues to the	the arrears of outstanding statutory dues as on the last day of the financial year concerned for a
•	•	other statutory dues to the appropriate authorities and if not,	the last day of the financial year concerned for a
or having an average	value added tax, cess and any	other statutory dues to the	the last day of the financial year concerned for a period of more than six months from the date
or having an average annual turnover	value added tax, cess and any other statutory dues with the	other statutory dues to the appropriate authorities and if not,	the last day of the financial year concerned for a
or having an average annual turnover exceeding five crore	value added tax, cess and any other statutory dues with the appropriate authorities and if	other statutory dues to the appropriate authorities and if not, the extent of the arrears of	the last day of the financial year concerned for a period of more than six months from the date
or having an average annual turnover exceeding five crore rupees for a period of	value added tax, cess and any other statutory dues with the appropriate authorities and if not, the extent of the arrears	other statutory dues to the appropriate authorities and if not, the extent of the arrears of outstanding statutory dues as on	the last day of the financial year concerned for a period of more than six months from the date
or having an average annual turnover exceeding five crore rupees for a period of three consecutive	value added tax, cess and any other statutory dues with the appropriate authorities and if not, the extent of the arrears of outstanding statutory dues	other statutory dues to the appropriate authorities and if not, the extent of the arrears of outstanding statutory dues as on the last day of the financial year	the last day of the financial year concerned for a period of more than six months from the date
or having an average annual turnover exceeding five crore rupees for a period of three consecutive financial years	value added tax, cess and any other statutory dues with the appropriate authorities and if not, the extent of the arrears of outstanding statutory dues as at the last day of the	other statutory dues to the appropriate authorities and if not, the extent of the arrears of outstanding statutory dues as on the last day of the financial year concerned for a period of more	the last day of the financial year concerned for a period of more than six months from the date

company has an internal audit system commensurate with its size and nature of its business;	became payable, shall be indicated by the auditor.	indicated;	
	(b) in case dues of income tax or sales tax or wealth tax or service tax or duty of customs or duty of excise or value added tax or cess have not been deposited on account of any dispute, then the amounts involved and the forum where dispute is pending shall be mentioned. (A mere representation to the concerned Department shall not constitute a dispute).	(b) where dues of income tax or sales tax or service tax or duty of customs or duty of excise or value added tax have not been deposited on account of any dispute, then the amounts involved and the forum where dispute is pending shall be mentioned. (A mere representation to the concerned Department shall not be treated as a dispute).	(b) where statutory dues referred to in subclause (a) have not been deposited on account of any dispute, then the amounts involved and the forum where dispute is pending shall be mentioned. (A mere representation to the concerned Department shall not be treated as a dispute).
	(c) whether the amount required to be transferred to investor education and protection fund in accordance with the relevant provisions of the Companies Act, 1956 ( 1 of 1956) and rules made thereunder has been transferred to such fund within time.		
(viii) where maintenance of cost records has been	(viii) whether in case of a company which has been registered for a period not	(viii) whether the company has defaulted in repayment of loans or borrowing to a financial institution,	(viii) whether any transactions not recorded in the books of account have been surrendered or

prescribed by the Central Government under clause (d) of sub-section (1) of section 209 of the Act, whether such accounts and records have been made and maintained;	less than five years, its accumulated losses at the end of the financial year are not less than fifty per cent of its net worth and whether it has incurred cash losses in such financial year and in the immediately preceding financial year;	bank, government or dues to debenture holders? If yes, the period and the amount of default to be reported (in case of defaults to banks, financial institutions, and government, lender wise details to be provided).	asse so, has acco	losed as incessments unwhether theen propount during	ider the e previce perly red the year	Income busly ur corded -?	e Tax Act, nrecorded in the b	. 1961; if I income pooks of
(ix) (a) is the company regular in depositing undisputed statutory dues including Provident Fund, Investor Education and Protection Fund, Employees' State Insurance, Income-tax, Sales-tax, Wealth Tax, Service Tax, Custom Duty, Excise Duty, cess and any other statutory dues with the appropriate authorities and if not, the extent of the arrears of outstanding statutory dues as at the last day of the financial year concerned for a period of more than six months from the date they became payable, shall be indicated by the auditor.	(ix) whether the company has defaulted in repayment of dues to a financial institution or bank or debenture holders? If yes, the period and amount of default to be reported;	(ix) whether moneys raised by way of initial public offer or further public offer (including debt instruments) and term loans were applied for the purposes for which those are raised. If not, the details together with delays or default and subsequent rectification, if any, as may be applicable, be reported;	repa pay yes,	whether to ayment of low ment of into the period orted as per Name of lender*  * lender wise details to be provided in case of defaults to banks, financial institutions and Government.	ans or c erest the and the	other bonereon	errowings to any le nt of defa	or in the ender? If

(b) in case dues of Income tax/ Sales tax /Wealth tax/ Service tax/ Custom duty/ Excise duty/ cess have not been deposited on account of any dispute, then the amounts involved and the forum where dispute is pending shall be mentioned.  (A mere representation to the Department shall not constitute a dispute).		(b) Whether the company is a declared wilful defaulter by any bank or financial institution or other lender?
		(c) Whether term loans were applied for the purpose for which the loans were obtained; if not, the amount of loan so diverted and the purpose for which it is used may be reported.
		(d) whether funds raised on short term basis have been utilised for long term purposes? If yes, the nature and amount to be indicated.
		(e) whether the Company has taken any funds from any entity or person on account of or to meet the obligations of its subsidiaries, associates or joint ventures? If so, details thereof with nature of such transactions and the amount in each case
		(f) whether the Company has raised loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies? If so, give details thereof and also report if the

			company has defaulted in repayment of such loans raised.
(x) whether in case of a company which has been registered for a period not less than five years, its accumulated losses at the end of the financial year are not less than fifty per cent of its net worth and whether it has incurred cash losses in such financial year and in the immediately preceding financial year;	(x) whether the company has given any guarantee for loans taken by others from bank or financial institutions, the terms and conditions whereof are prejudicial to the interest of the company;	(x) whether any fraud by the company or any fraud on the Company by its officers or employees has been noticed or reported during the year; If yes, the nature and the amount involved is to be indicated;	(x) (a) whether moneys raised by way of initial public offer or further public offer (including debt instruments) during the year were applied for the purposes for which those are raised. If not, the details together with delays or default and subsequent rectification, if any, as may be applicable, be reported;
			(b) whether the Company has made any preferential allotment or private placement of shares or convertible debentures (fully, partially or optionally convertible) during the year and if so, whether the requirements of Section 42 and Section 62 of the Companies Act, 2013 have been complied with and the funds raised have been used for the purposes for which the funds were raised. If not, provide details in respect of amount involved and nature of noncompliance;
(xi) whether the company has defaulted in repayment of dues to a financial institution or bank or debenture	(xi) whether term loans were applied for the purpose for which the loans were obtained;	(xi) whether managerial remuneration has been paid or provided in accordance with the requisite approvals mandated by the provisions of section 197 read	(xi) (a) whether any fraud by the company or any fraud on the Company has been noticed or reported during the year; If yes, the nature and the amount involved is to be indicated;

holders? If yes, the period and amount of default to be reported;		with Schedule V to the Companies Act? If not, state the amount involved and steps taken by the company for securing refund of the same;	(b) whether any report under sub-Section (12) of
			Section 143 of the Companies Act has been filed by the auditors in Form ADT-4 as prescribed under Rule 13 of Companies (Audit and Auditors) Rules 2014 with the Central Government?
			(c) whether the auditor has considered whistle- blower complaints, if any, received during the year by the Company?
(xii) whether adequate documents and records are maintained in cases where the company has granted loans and advances on the basis of security by way of pledge of shares, debentures and other securities; If not, the deficiencies to be pointed out.	(xii) whether any fraud on or by the company has been noticed or reported during the year; If yes, the nature and the amount involved is to be indicated.	(xii) whether the Nidhi Company has complied with the Net Owned Funds to Deposits in the ratio of 1: 20 to meet out the liability and whether the Nidhi Company is maintaining ten per cent unencumbered term deposits as specified in the Nidhi Rules, 2014 to meet out the liability;	(xii) (a) whether the Nidhi Company has complied with the Net Owned Funds to Deposits in the ratio of 1:20 to meet out the liability
			(b) whether the Nidhi Company is maintaining ten per cent unencumbered term deposits as specified in the Nidhi Rules, 2014 to meet out the liability;
			(c). whether there has been any default in payment of interest on deposits or repayment

		thereof for any period and if so, the details thereof
(xiii) whether the provisions of any special statute applicable to chit fund have been duly complied with? In respect of nidhi/ mutual benefit fund/societies;  (a) whether the netowned funds to deposit liability ratio is more than 1:20 as on the date of balance sheet;	(xiii) whether all transactions with the related parties are in compliance with section 177 and 188 of Companies Act, 2013 where applicable and the details have been disclosed in the Financial Statements etc., as required by the applicable accounting standards;	(xiii) whether all transactions with the related parties are in compliance with sections 177 and 188 of Companies Act where applicable and the details have been disclosed in the Financial Statements etc., as required by the applicable accounting standards;
(b) whether the company has complied with the prudential norms on income recognition and provisioning against substandard/doubtful/loss assets;		
(c) whether the company has adequate procedures for appraisal of credit proposals/requests, assessment of credit needs and repayment capacity of the borrower;		

(d) whether the repayment schedule of various loans granted by the nidhi is based on the repayment capacity of the borrower;		
(xiv) if the company is dealing or trading in shares, securities, debentures and other investments, whether proper records have been maintained of the transactions and contracts and whether timely entries have been made therein; also whether the shares, securities, debentures and other investments have been held by the company, in its own name except to the extent of the exemption, if any, granted under section 49 of the Act;	(xiv) whether the company has made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year under review and if so, as to whether the requirement of section 42 of the Companies Act, 2013 have been complied with and the amount raised have been used for the purposes for which the funds were raised. If not, provide the details in respect of the amount involved and nature of non-compliance;	<ul><li>(xiv) (a) whether the company has an internal audit system commensurate with the size and nature of its business?</li><li>(b) Whether the reports of the Internal Auditors for the period under audit were considered by the statutory auditor?</li></ul>
(xv) whether the company has given any guarantee for loans taken by others from bank or financial institutions, the terms and conditions	(xv) whether the company has entered into any non-cash transactions with directors or persons connected with him and if so, whether the provisions of section 192 of Companies Act,	(xv) whether the company has entered into any non- cash transactions with directors or persons connected with him and if so, whether the provisions of section 192 of Companies Act have been complied with;

whereof are prejudicial to the interest of the company;	2	2013 have been complied with;	
(xvi) whether term loans were applied for the purpose for which the loans were obtained;	r s c	(xvi) whether the company is required to be registered under section 45-IA of the Reserve Bank of India Act, 1934 and if so, whether the registration has been obtained.	(xvi) (a) whether the company is required to be registered under section 45-1A of the Reserve Bank of India Act, 1934 and if so, whether the registration has been obtained.
			(b) whether the Company has conducted any Non-Banking Financial or Housing Finance activities without a valid Certificate of Registration (CoR) from the Reserve Bank of India Act 1934
			(c) whether the Company is a Core Investment Company (CIC) as defined under the Regulations by the Reserve Bank of India? If so, whether it continues to fulfil the criteria of a CIC and In case the company is an exempted or unregistered CIC, whether it continues to fulfil such criteria.
			(d) Whether the Group has more than one CIC as part of the Group, If yes, indicate the number of CICs which are part of the Group.
(xvii) whether the funds raised on short-term basis have been used for long term investment; If yes, the nature and amount is to be indicated;			(xvii) whether the Company has incurred cash losses in the Financial Year and in the immediately preceding Financial year? If so, state the amount of cash losses

(xviii) whether the company has made any preferential allotment of shares to parties and companies covered in the Register maintained under section 301 of the Act and if so whether the price at which shares have been issued is prejudicial to the interest of the company;		(xviii) whether there has been any resignation of the statutory auditors during the year? If so, whether the auditor has taken into consideration the issues, objections or concerns raised by the outgoing auditors?
(xix) whether security or charge has been created in respect of debentures issued;		(xix) on the basis of the financial ratios, ageing and expected dates of realisation of financial assets and payment of financial liabilities, other information accompanying the financial statements, the auditor's knowledge of the Board of Directors and management plans, whether the auditor is of the opinion that no material uncertainty exists as on the date of the audit report that company is capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date.
(xx) whether the management has disclosed on the end use of money raised by public issues and the same has been verified;		xx) (a) whether, in respect of other than ongoing projects, the company has transferred unspent amount to a Fund specified in Schedule VII to the Companies Act within a period of six months of the expiry of the financial year in compliance with second proviso to sub-section (5) of section 135 of the said Act.

		(b) whether any amount remaining unspent under sub-section (5) of section 135 of the Companies Act pursuant to any ongoing project, has been transferred to special account in compliance with the provision of sub-section (6) of section 135 of the said Act.
(xxi) whether any fraud on or by the company has been noticed or reported during the year; If yes, the nature and the amount involved is to be indicated.		(xxi) whether there have been any qualifications or adverse remarks by the respective auditors in the Companies (Auditor's Report) Order (CARO) reports of the companies included in the consolidated financial statements? If yes, indicate the details of the companies and the paragraph numbers of the CARO report containing the qualifications or adverse remarks