

## INDIA ODI CROSS-BORDER COMPLIANCE CALENDAR

Critical Filing Deadlines for Indian Founders with **US, UAE or Singapore** Subsidiaries (ODI)

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### The Golden Rule

*"In FEMA, penalties compound monthly. A missed due date today is a Notice from the ED tomorrow."*

Use this calendar to ensure your Finance Team is not missing the critical link between your Indian HQ and Foreign Entity.

### 1. Annual Recurring Filings (The "Must-Dos")

Deadline	Form Name	Purpose	Risk Level
July 15	<b>FLA Return</b> (Foreign Liabilities & Assets)	Reporting foreign assets held by the Indian entity to RBI.	<b>High:</b> Mandatory even if the Foreign entity has zero revenue.
Dec 31*	<b>APR</b> (Annual Performance Report)	Reporting the financial health of the Overseas Joint Venture/Wholly Owned Subsidiary (WOS).	<b>High:</b> Requires audited financials of the Foreign entity.

*\*Note: The APR deadline depends on your Foreign entity's financial year end. If Dec 31st, APR is due by June 30th or Dec 31st depending on audit completion. Consult to confirm.*

### 2. Event-Based Filings (The "Hidden Traps")

- **Form FC (Foreign Currency):** Must be filed within **30 days** of sending money to the Foreign Entity (Capital Contribution).
  - *Common Error:* Founders send money via LRS (Personal) but RBI treats it as an ODI, without filing Form FC. This is a technical default.
- **Share Certificate Submission:** You must submit the Share Certificate issued by the foreign entity to your Indian AD Bank within **6 months** of investment.
  - *Penalty:* If missed, the AD Bank will block future remittances.

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### 3. The "Red Flag" Checklist (Do not ignore)

- **UIN Status:** Does your Foreign Entity have a Unique Identification Number (UIN) generated by RBI? If not, your investment is unauthorized.
- **Round Tripping:** Has your Foreign entity invested *back* into any Indian startup (even a different one)? This requires prior RBI approval.
- **LRS Limit:** For personal holdings, have you crossed the \$250,000 limit per financial year?

#### Need a Compliance Health Check?

If you aren't sure if you have filed the **APR** last year, you might already be accruing late fees.

We offer a 30-Minute FEMA Diagnostic Call.

We will check your UIN status and filing history to ensure you are due diligence ready.

[Click Here to Book Your Diagnostic Call with CA Adityavikram Banka](#)