Your TDS Return Just Got Renumbered

From the quarter ended 30 June 2026, Form 24Q becomes Form 138. The Q1 return is due 31 July 2026.

TDS AND TCS | INCOME-TAX ACT 2025 | INCOME-TAX RULES 2026

> The single biggest operational change this quarter is not a new rate or threshold. It is that the return you have filed for a decade has a new number, a new name, and a new section reference.

What Actually Changed - Not a Rate, a Renumbering

The Income-tax Act 2025 came into force on 1 April 2026, replacing the 1961 Act for tax year 2026-27. Alongside it, the CBDT notified the Income-tax Rules 2026 with an entirely renumbered set of forms.

What Did NOT Change

The content and logic of each TDS and TCS statement remain exactly the same. The underlying compliance obligation is unchanged.

What DID Change

- The form number
- The form name
- The statutory section printed inside each return

The obligation to file now sits in Section 397 of the Act 2025. Section 397(3)(b) requires every deductor, collector and employer to deliver the quarterly statement in the prescribed form. Your quarterly return is now a Section 397 statement, not a Section 200(3) or 206C(3) statement.

The Old-to-New Mapping - Pin This to the Wall

Every TDS and TCS form has been renumbered under the Income-tax Rules 2026. Use this reference table to update your registers, SOPs and templates immediately.

Form Purpose	Old Form	New Form	Type
Quarterly TDS statement, salary	Form 24Q	**Form 138**	Quarterly Return
Quarterly TDS statement, resident non-salary	Form 26Q	**Form 140**	Quarterly Return
Quarterly TDS statement, non-resident payments	Form 27Q	**Form 144**	Quarterly Return
Quarterly TCS statement	Form 27EQ	**Form 143**	Quarterly Return
TDS certificate, salary	Form 16	**Form 130**	Certificate
TDS certificate, non-salary	Form 16A	**Form 131**	Certificate
TCS certificate	Form 27D	**Form 133**	Certificate
Employee investment declaration	Form 12BB	**Form 124**	Declaration
Nil or lower TDS self-declaration	Form 15G / 15H	**Form 121**	Self-Declaration
Challan-cum-statement (NEW)	-	**Form 141**	New Form
Virtual digital asset transfers (NEW)	-	**Form 142**	New Form

ⓘ Two genuinely new forms have been introduced: Form 141 (challan-cum-statement) and Form 142 (virtual digital asset transfers). These have no predecessor under the old regime.

The Q1 Filing Calendar

31 JULY 2026

The one date to internalise: 31 July 2026 for every Q1 statement.

1

7 July 2026

Deposit of June 2026 TDS and TCS. This is the payment deadline, not the return deadline.

2

31 July 2026 - Form 138

Q1 TDS return, salary (was Form 24Q). File on or before this date.

3

31 July 2026 - Form 140

Q1 TDS return, resident non-salary (was Form 26Q). File on or before this date.

4

31 July 2026 - Form 144

Q1 TDS return, non-resident payments (was Form 27Q). File on or before this date.

5

31 July 2026 - Form 143

Q1 TCS return (was Form 27EQ). Now aligned with TDS return deadline.

The TCS Date Shift - The Trap Most Collectors Will Miss

What Changed for TCS Collectors

Under the old regime, the TCS return in Form 27EQ for the April to June quarter was due on **15 July**.

Under the Income-tax Rules 2026, the TCS statement in Form 143 now follows the same schedule as the TDS returns and is due on **31 July**.

Two Opposite Mistakes to Avoid

1. The collector who diarised 15 July out of habit now files early and burns effort.
2. The collector who assumes the TCS return is already late on the 16th is simply mistaken.

File both TDS and TCS on or before 31 July. One deadline. All statements.

Who Is Affected - No Threshold, No Opt-Out

Every deductor and collector with a TAN: every company, LLP, firm, trust and proprietor who deducts tax on salaries, contractor payments, professional fees, rent, interest or commission, or who collects tax at source. There is no size threshold and no opt-out.

Payroll and HR Teams

Reissue internal templates. The salary certificate is now Form 130 (was 16). The investment declaration you collect is now Form 124 (was 12BB).

Software Users

Largely insulated IF the vendor has pushed the FY 2026-27 update. Verify this before 31 July - do not assume the update is live.

Highest Risk Group

Manual filers, small deductors using the department utility, and anyone reconciling against a register that still references old form names.

Uploading an old Form 24Q or 26Q for Q1 will trigger a validation rejection on TRACES while the late-fee clock keeps running.

The Penalty Stack

Missing any deadline under the new regime carries the same financial consequences as before - but the clock starts earlier than most deductors realise.

1

Late-Filing Fee

Rs 200 per day of delay (the Act 2025 successor to Section 234E), running from the due date, capped at the total TDS or TCS in that return.

2

Interest on Late Deposit

1.5 percent per month or part of a month, running from the date tax was actually deducted, not from the 7th of the next month. One day late on deposit attracts a full month of interest.

3

Penalty for Non-Filing or Incorrect Particulars

Separate penalty exposure for non-filing or incorrect particulars, in addition to the fee and interest. These are cumulative, not alternative.

4

The 7 July Deposit Deadline

The 7 July deposit deadline for June is the one that quietly costs the most when missed. Interest runs from the deduction date, not the deposit due date.

What This Means for You

Founders and CFOs

Confirm your TDS software is on the FY 2026-27 update before 31 July, and treat this as an operations task, not a year-end one. Every entity with a TAN is in scope. No exceptions based on size or structure.

Payroll and HR Teams

Reissue Form 130 (salary certificate) and Form 124 (investment declaration) templates now, and brief employees that the numbers on their documents have changed. Do not wait for employees to ask.

Tax Teams and Manual Filers

Update SOPs, filing registers and internal checklists to the new numbers, and do NOT mix old and new. Old forms apply only to transactions up to 31 March 2026. New forms apply from 1 April 2026 onwards.

Your 5-Step Action Plan

1

Step 1 - Verify Software Update

Confirm your TDS and payroll software vendor has pushed the FY 2026-27 form update before you file anything.

2

Step 2 - Update All Templates

Update SOPs, templates and registers to the new form numbers: 138, 140, 144, 143, 130, 131, 124.

3

Step 3 - Deposit by 7 July

Deposit June 2026 TDS and TCS by 7 July. Interest runs from the deduction date, not the deposit due date.

4

Step 4 - File by 31 July

File all Q1 returns - Form 138, 140, 144 and 143 - on or before 31 July 2026. All four statements share the same deadline.

5

Step 5 - No Mixing Old and New

Do not mix old and new numbers. Old forms cover only transactions up to 31 March 2026. New forms apply from 1 April 2026.

> Not sure your filings are on the new forms? Talk to an expert.
>
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