



Foreign Exchange Department
Foreign Investment Division

Foreign Investment Reporting and Management System (FIRMS)-Frequently Asked questions (FAQs)

Step by step procedure for FIRMS application are provided in two user manuals. Please read the same before making any filing on FIRMS application

User manual on Entity Master

User Manual on SMF-FIRMS

Q1. Whom should I contact first with respect to Business User registration and forms filed in SMF?

A1. Contact your Authorised Dealer Bank first. Business User registrations and forms filed in SMF are processed at AD level.

Q2. I have registered as an Entity user but cannot see option for filing Single Master Form (SMF)?

A2. For filing in SMF, one has to register as a Business User, which is separate from Entity User. Step by step procedure for registration of Business user is given in the **User manual for SMF-FIRMS (hyperlink)**

Q3 Where would I receive login credentials for Entity User or Business user ?

A3 Login credentials would be received at the registered email id.

Q4 What do I do if I am getting the error “Username already present in DB”?

A4 Use a different username and submit.

Q5. What is the difference between Entity user and Business User?

A5. Entity User is only with respect to an entity which has received foreign investment and is required to provide details of foreign investment, including indirect foreign investment, in the Entity Master. Submission of Entity master does not entails to submission of regulatory filings under FEMA 20(R).

Business User is the one who would be making filing in Single Master Form, in compliance with the provisions of FEMA 20(R). Whereas the Entity user credentials are entity specific, business user credentials can be obtained by any individual/ entity who is

required to make filing in SMF for FC-GPR, FC-TRS, LLP-I, LLP-II ,CN, DRR, DI, ESOP and InVi

Q6. Which authorization letter is to be used for Entity User registration and the documents that needs to be attached?

A6. The authorisation letter as in the User manual for Entity Master (hyperlink for authority letter) is to be used. PAN card of the user and the one document clearly stating reasons for not making entity user registration in the initial window (June 28, 2018 to July 20, 2018), is to be attached.

Q7 How do I attach three documents viz. authorization letter, copy of PAN card and reasons for not making registration in the initial window for entity user registration.

A7. Scan all three documents together as one single .pdf file and attach at the attachment “authority letter.”

Q8. What is the maximum attachment size?

A8. Maximum attachment size is 1 MB for all attachments in the FIRMS applications. Refrain from attaching bulky documents and attach only the relevant extracts as and wherever required.

Q9. I have filled incorrect details in the Entity Master and want to rectify it?

A9. For any correction in the entity master details, the request can be made at fedsupport@rbi.org.in and helpfirms@rbi.org.in in the following format:

- User ID:
- CIN/LLP Number:
- Registered Email Id:
- Issue description (Reasons for the change):
- What are the changes need to be done? :

Sr. No.	Data field to be updated	Old value (existing)	New Value (to be updated)

- Confirmation for change in Entity Master **(Please attach scan copy of request letter signed by Managing Director / Director / Secretary of the Company / Designated Partner (in case of LLP)**

Q.10 I want to change the entity user and authorised person for my entity ?

A10. Entity user credentials are entity specific and not person specific. The entity may authorise any person at their as authorised person. The user name cannot be changed as it is the primary identifier in the FIRMS application. The company may send request to fedsupport@rbi.org.in for updating the registered email id and resetting the password.

Q11. Which entity do I need to select at the time of Business user registration?

A11. The entity for which the reporting is being made and may change the shareholding pattern i.e. investee company is to be selected at the time of Business user registration. For example, if a resident company A has sold shares of Indian company B to a non-resident and would have to file Form FC-TRS in SMF , the company A would make registration for Business User and would select the CIN of company B.

Q12. Which authorization letter is to be used for Business User registration?

A12 .The authorisation letter as in the User manual for SMF- FIMRS (hyperlink for authority letter) is to be used. Please attach the PAN card of the person making registration for Business User.

Q13. Is the authorisation letter for Entity Master different from authorization letter for Business User.

A 13.Yes

Q14.Which authorization letter is to be used for Business User registration by an Individual?

A14. The authorisation letter as in the User manual for SMF- FIMRS (hyperlink for authority letter) is to be used. The purpose of authority letter is to facilitate Authorised Dealer Banks in identifying their client and approving the registration. Where the Business User is an individual, **the authority letter need not be on any letterhead.** The user may self-authority and may strike out whichever is not applicable for an individual.

Q15. Do I need to provide account number in the authorization letter for Business User?

A15. Yes, the account number of the user is to be provided and also the authorized signatory for that account.

Q16. I cannot find the IFSC code of my Bank at the Business User registration page?

A16. Only select branches of the AD banks are incorporated in the FIRMS application based upon the request received from the Banks. Only these branches are authorized for processing registrations and applications in FIRMS. **Either select the existing IFSC code for your bank or contact your Bank for any clarification on this issue.**

Q17. How can I select CIN/ LLPIN of the entity for Business User registration?

A17. Use search icon against the CIN label, enter the CIN/LLPIN number and select the entity.

Q18. I cannot find the CIN/LLPIN of my entity at the Business User registration page?

A18. First submit the details in the Entity Master, then only the details would be available in the registration page.

Q19 I have registered for the Business user but have not received Login credentials.

A19.The Business user registrations are processed at AD level, check with your AD bank to whom the registration was submitted. If the issue persists send mail to fedsupport@rbi.org.in along with the username.

Q20 I have submitted the Business user registration, but my AD bank cannot see in its queue?

A20 All submitted registrations are reflected in the bank's queue on an immediate basis. If the registrations are not reflected, send mail to fedsupport@rbi.org.in, clearly mention your username and the AD to whom the submission was made.

Q21.I am filing a form in SMF but the pre transaction values in Shareholding pattern are not correct?

A21.The pre transaction values in the Shareholding pattern are fetched from the details in the Entity Master. Please verify the details in the Entity master.

Q 22. I have filed one form in SMF, but have not received acknowledgement?

A22. All Forms in SMF are processed at AD bank level. Contact your AD bank to whom the reporting was made (as per the IFSC chosen at the time of Business User registration).

Q23. I have filed one file in SMF, but I cannot file any other form and the error pop-up "Submitted forms are under approval".

A23. All forms in SMF are integrated with the Entity master and updates the shareholding pattern in the entity master upon acknowledgement. Therefore, the previous forms has to be completely processed before second form can be filed. Please check with your AD bank.

Q24.What is regulatory time period for filing of Forms in SMF.?

A24 The time period is as per Regulation 13 of Foreign Exchange Management (Transfer or Issue of Security by a Person Resident Outside India) Regulations, 2017 dated November 07, 2017 and as amended from time to time.

Q25. Whether ARF is required to be filed in SMF?

A25. With the introduction of SMF, ARF has been discontinued with effect from September 01, 2018. For more information, please refer to user manuals.

Q26. Can I do resubmission of a return which got rejected on SMF?

A26. No. there is no resubmission on SMF. Either the return would be acknowledged or completely rejected. For rejected ones, you can file the return as fresh form.

Q27. Whom can I contact for queries of technical nature?

A27. For queries of technical nature, such as Login ids not received, account blocked, application not received, user credentials not working etc, all mails may be marked to fedsupport@rbi.org.in with username and to be sent through registered email id.

Q28. Do the form submitted on ebiz need to be filed on SMF?.

A28. Forms submitted on ebiz would be processed on ebiz. Please contact your AD bank/ Respective regional office of RBI.

Q29. The post transaction shareholding pattern is not correctly reflected in the form in SMF?

A29. Please choose the field correctly '**Whether the change in the shareholding pattern due to this transaction being reported has already been accounted in the pre transaction shareholding pattern:***'. Please refer to Shareholding pattern section of the user manual on SMF-FIRMS.

Q30.What forms are available for filing in SMF?

A30. 9 forms viz., FC-GPR, FC-TRS, LLP-I, LLP-II ,CN, ESOP, DRR, DI and InVi are available for filing in SMF.

Q31. Since when the filing of Form InVi is applicable?

A31. Form InVi is applicable with effect from February 05, 2019.

Q32. What is form InVi and who shall file it ?

A32. Form InVi is for the reporting of foreign inflow received in an Investment Vehicle in terms of of Regulations 5(8) of FEMA 20(R). It shall be filed by the Investment vehicle within 30 days from the date of issue of units to the foreign investors.

Q33. Is entity master registration before making Business user registration for form InVi?

A33. No entity master registration is required for filing form InVi. The applicant may directly register for Business user registration as per the instructions in the user manual for SMF-FIRMS.

Q34. Can I use my SMF business registration for making filing for form InVi.

A34. Form InVi is only meant for the Investment Vehicle and is not available for all applicants. A separate Business user registration as per the user manual is required.

Q35. What is the formula for calculating the percentage foreign investment in an entity in the FIRMS application ?

A35. Percentage of foreign investment

= Value of total foreign investment
(on fully diluted basis)

----- * 100
Total paid up capital (resident + non-resident)
(on fully diluted basis)

Q36. What is the value of paid up capital on fully diluted basis, wherever applicable, to be entered while filing returns in SMF ?

A36. The value for paid up capital on fully diluted basis to be entered is the post transaction paid up capital on a fully diluted basis and is utilized for calculation of post transaction foreign investment in the entity.

Q37. What if the data provided in the form in SMF is incorrect?

A37. The onus of providing correct and data complete in all respects is on the applicant making the filing and would be held responsible for the same.

Q38. I have filled the entity master in the first window, however certain filings were further made in Ebiz but are not included in the entity master, what shall be done?

A38. In such cases before making any filing in SMF, the details have to be updated in the Entity master. Ask for a correction in entity master as per Q9 above.

Q39. How can I report buy-back/ capital reduction in form FC-TRS?

A39. Since a buyback or capital reduction is a corporate action, the entity master has to be updated before FC-TRS can be filed. Ask for the entity master change as per Q9 above specifically mentioning the reason being buy-back/ capital reduction. The new values shall be the post transaction value i.e post buy/back/ capital reduction.

Q40. How should the filing be made in SMF where the foreign direct investment is becoming indirect foreign investment.

A40. In such cases, first form FC-TRS shall be filed for reduction in FDI and then form DI shall be filed for the corresponding increase in Indirect foreign investment.

Q41. How should the filing be made in SMF where the indirect foreign investment is becoming foreign direct investment?

A41. For such cases the entity master changes are required before form FC-TRS can be filed. Ask for the entity master change as per Q9 above for such cases.

Q42. What are the list of documents to be attached at the time of making filing in the FIRMS application?

A42. The documents required to be attached are as per the user manual on SMF-FIRMS.

Q43. I have more than 1000 shareholders to whom bonus or rights issue is made. How do I make filing in FC-GPR-SMF?

A43. FC-GPR is required to be filed where the foreign investment is reckoned as an FDI i. e. only for those non-resident investors where the original investment is FDI. File form FC-GPR in SMF accordingly.

Q44. At the AD level, I am unable to see the filed attachments but the company is insisting that they have attached the necessary documents. How to proceed?

A44. If such is the case, clear your cached memory and then open the form. The cached memory may be saving the previous browsing data. You may also try in other browsers (latest version). If still the issue persist, send the mail to fedsupport@rbi.org.in

Q45. I need to file form ESOP for different scheme and different grant price?

A45. At present , only one scheme details can be entered in one form. You need to file multiple Form ESOP for different grant price/different scheme. Further, upon exercise of such options and allotment of shares, form FC-GPR is to be filed and not form ESOP.

Q46. How shall a newly incorporated entity or the entity receiving foreign investment for the first time enter data in the entity master?

A34. For such cases, the entity user registration shall be made as per the procedure. While filling the details in tab 3 of the entity master, enter the latest paid up capital on fully diluted basis and all other details may be entered as 0 (zero).