

EPFO Compliance Checklist 2026

For Exempted PF Trust Managers

100+ compliance checkpoints covering EPFO SOP 2023, Labour Codes 2025, Investment Norms & Annual Audit Prep

1,276

Exempted PF Trusts in India

85%

Min. govt. securities investment mandate

■ Lakh+

Avg. penalty per compliance default

How to Use This Checklist

This checklist is designed for Provident Fund Trust Managers, HR Heads, Finance Controllers and Trustees of EPFO-exempted PF establishments. Use it quarterly for self-audit and annually before your statutory audit submission. Items marked MANDATORY carry regulatory penalty risk.

MANDATORY

Regulatory requirement. Non-compliance may attract EPFO penalty or trust cancellation.

BEST PRACTICE

Strongly recommended. Protects the trust during audit inspections.

PERIODIC

Required on a quarterly or annual cycle. Note the due date.

About myPF Software

myPF Software is India's dedicated Provident Fund Trust Management platform, built exclusively for EPFO-exempted establishments. Our on-premise solution handles:

- Member & contribution management
- Investment tracking (85%/15% norms)
- Auto-generation of EPFO statutory reports
- Employee Self-Service portal
- Annual balance sheet & BRS
- Gratuity & Superannuation modules
- Loan, transfer-in/out, settlement workflows
- Free data migration from Excel/legacy

Book a Free Compliance Demo — mypfsoftware.com/demo

See how we automate every item in this checklist

1 Section 1 — Trust Registration & Governance

MANDATORY Valid exemption certificate from EPFO under Section 17 of EPF Act, 1952

MANDATORY Trust deed registered & updated with current trustee details

Re-registration required within 30 days of trustee change

MANDATORY Minimum trustee composition: equal employer + employee representatives

Trust rules aligned with latest EPFO Model Rules

Review after any Labour Code notification

Board of Trustees meeting minutes maintained (min. 2 per year)

Trustee KYC and DSC updated for e-filing

Required for signing electronic returns

Trust PAN, TAN obtained and active

MANDATORY Separate bank account exclusively for trust operations

2 Section 2 — Member Account Management

MANDATORY PF account opened for all eligible employees within 30 days of joining

MANDATORY UAN seeding with Aadhaar, PAN and bank account completed

Mandatory per EPFO circular; required for digital claim processing

MANDATORY Nomination forms (Form 2) collected & updated for all members

MANDATORY Employee ledger updated monthly with contributions & interest

Transfer-in applications (Form 13) processed within 20 days

Penalty risk on delays beyond EPFO SOP timelines

KYC documents collected and uploaded on unified portal

PF statements shared with members (min. once per year)

MANDATORY Deceased member settlement initiated within 30 days

Failure attracts trustee liability

3 Section 3 — Contribution Compliance

- MANDATORY** **Employer contribution: min. 12% of basic + DA deposited monthly**
Must match or exceed EPFO's declared rate
- MANDATORY** **Employee contribution: 12% deducted and deposited by 15th of next month**
Late deposit attracts 12% p.a. penal interest
- MANDATORY** **Pension contribution (8.67% of wages) remitted to EPFO separately**
Even exempted trusts must remit pension to EPFO
- MANDATORY** **EDLI (Employee Deposit Linked Insurance) contribution remitted to EPFO**
■ 75/member/month or as applicable
- MANDATORY** **ECR (Electronic Challan cum Return) filed on EPFO unified portal monthly**
- Contribution on allowances reviewed post Supreme Court judgments
Includes HRA, special allowance — legal review recommended
- Arrear contributions (on increment, revision) deposited with interest
- Contract workers / third-party payroll PF contributions tracked

4 Section 4 — Investment Management (EPFO Norms)

- MANDATORY** **Min. 85% of corpus invested in government-approved debt instruments**
Mandatory EPFO investment pattern — primary audit trigger
- MANDATORY** **Max. 15% in equities (only NIFTY/SENSEX index ETFs permitted)**
Crossing limit is a major compliance violation
- Investment register maintained with maturity dates & interest tracking
- Investment committee approval obtained before each transaction
- MANDATORY** **No investment in related-party instruments or employer securities**
Strictly prohibited under EPFO investment norms
- Maturity proceeds reinvested within 7 working days
Idle funds for extended periods attract scrutiny
- SLR (Statutory Liquidity Ratio) instruments verified quarterly
- Investment policy document reviewed & approved by trustees annually

5 Section 5 — Annual Returns & Statutory Filings

- MANDATORY** Annual Return (Form 3A / 6A equivalent) filed before 30th April
Filing deadline — non-compliance triggers EPFO inspection
- MANDATORY** Audited Balance Sheet of PF Trust submitted to EPFO within 6 months of FY end
- MANDATORY** Receipts & Payments Account prepared and approved by trustees
- MANDATORY** Income & Expenditure Statement prepared (separate from employer's books)
- Bank Reconciliation Statement (BRS) completed monthly
One of the most common EPFO audit findings
- Income Tax Return filed for the trust separately (if applicable)
Trust income from non-exempt investments may be taxable
- Form 10C and 10D (pension withdrawals) processed with EPFO
- MANDATORY** Annual interest credited to all member accounts before 31st March
Rate declared by EPFO (8.25% for FY 2023-24)

6 Section 6 — Loans, Withdrawals & Settlements

- Loan eligibility criteria defined in trust rules and consistently applied
- Refundable & non-refundable loan registers maintained separately
- MANDATORY** Loan sanction within 30 days of application (SOP 2023 timeline)
Delay beyond SOP triggers escalation to EPFO
- MANDATORY** Form 19/10C settlement processed within 20 working days
EPFO SOP October 2023 — binding on exempted trusts
- Partial withdrawal (marriage, education, illness) eligibility verified before sanction
- Transfer-out (Form 13) completed within 20 days for resigned members
- MANDATORY** Death claim & EDLI payment initiated within 30 days
Family nominee must not face delay — trustee liability risk
- Outstanding loans reviewed quarterly; defaulting members flagged

7 Section 7 — EPFO Inspection Readiness (SOP 2023)

MANDATORY All registers/records available for EPFO inspection within 48 hours

EPFO SOP 2023 — trusts subject to periodic & surprise checks

MANDATORY Compliance officer designated and details submitted to EPFO

MANDATORY Previous inspection observations closed with documented proof

Trust deed, rules, trustee resolution book ready for inspector

Investment portfolio summary with purchase docs readily accessible

Member complaints register maintained and reviewed quarterly

Digital access control: role-based access to trust records enabled

Data backup policy in place; disaster recovery tested annually

On-premise deployments: backup must be off-site or cloud-mirrored

8 Section 8 — Labour Code & New-Age Compliance

Code on Social Security 2020 impact assessed for trust structure

May alter contribution definitions when fully notified

MANDATORY Wage definition under new Labour Codes reviewed (50% rule for allowances)

Impacts PF contribution base significantly

International worker (IW) PF compliance tracked separately (if applicable)

Different rules for expatriate and Totalization Agreement countries

Gratuity trust compliance reviewed alongside PF trust (joint audit risk)

Superannuation fund, if any, investment norms separately verified

Employee awareness sessions on PF self-service portal conducted

Reduces member complaints to EPFO

MANDATORY Annual trustee training on EPFO regulatory updates completed

Trustees bear personal liability under EPF Act

Cyber security audit of PF software & data systems done annually

Compliance Scorecard — Self Assessment

After completing the checklist, use this scorecard to rate your trust's compliance health.

Section	Total Items	Mandatory	Status (✓/X)	Action Owner	Due Date
1. Registration & Governance	8	4			
2. Member Account Management	8	5			
3. Contribution Compliance	8	6			
4. Investment Management	8	5			
5. Annual Returns & Filings	8	5			
6. Loans, Withdrawals & Settlements	8	4			
7. EPFO Inspection Readiness	8	3			
8. Labour Code & New-Age Compliance	8	2			
TOTAL	64	34			

Compliance Rating Guide

- Audit-Ready (90–100% complete)** File your annual return with confidence
- Needs Attention (70–89% complete)** Close gaps before your next EPFO inspection
- High Risk (Below 70% complete)** Engage compliance consultant immediately

Struggling with any of these 64 checkpoints?

myPF Software automates 90% of this checklist — contributions, investments, statutory reports, member ledgers, BRS, and EPFO-ready audit trails.

Book a Free Demo → mypfsoftware.com/demo