

**STATEMENT OF POSSIBLE TAX BENEFITS**

To,  
The Board of Directors,  
**SHIVASHRIT FOODS LIMITED**  
Gopal Ganj  
Sarai Lavaria, Aligarh  
Uttar Pradesh 202001  
(the "Company")

**Sub: STATEMENT OF POSSIBLE SPECIAL TAX BENEFIT ('THE STATEMENT') AVAIL TO (SHIVASHRIT FOODS LIMITED) AND ITS SHAREHOLDERS PREPARED IN ACCORDANCE WITH THE REQUIREMENTS UNDER SCHEDULE VI-CLAUSE 9L OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018 AS AMENDED (THE 'REGULATIONS')**

We hereby confirm that the enclosed annexure, prepared by "(Shivashrit Foods Limited)" ("the Company") states the possible special tax benefits available to the Company and the shareholders of the Company under the Income – tax Act, 1961 ('Act') as amended time to time, the Central Goods and Services Tax Act, 2017, the Integrated Goods and Services Tax Act, 2017, the State Goods and Services Tax Act as passed by respective State Governments from where the Company operates and applicable to the Company, the Customs Act, 1962 and the Foreign Trade Policy 2015-2020, as amended by relevant Finance Act, presently in force in India for inclusion in the Red Herring Prospectus ("RHP") / Prospectus for the proposed public offer of equity shares, as required under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("ICDR Regulations").

Several of these benefits are dependent on the Company or its shareholders fulfilling the conditions prescribed under the relevant provisions of the Act. Hence, the ability of the Company or its shareholders to derive the tax benefits is dependent upon fulfilling such conditions, which based on the business imperatives, the company may or may not choose to fulfil.

The benefits discussed in the enclosed Annexure cover only special tax benefits available to the Company and its Shareholders and do not cover any general tax benefits. Further, these benefits are neither exhaustive nor conclusive and the preparation of the contents stated is the responsibility of the Company's management. We are informed that this statement is only intended to provide general information to the investors and hence is neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of the tax consequences, the changing tax laws, each investor is advised to consult his or her own tax consultant with respect to the specific tax implications arising out of their participation in the issue. We are neither suggesting nor are we advising the investor to invest money or not to invest money based on this statement.

Our views are based on the existing provisions of the Act and its interpretations, which are subject to change or modification by subsequent legislative, regulatory, administrative or judicial decisions. Any such change, which could also be retroactive, could have an effect on the validity of our views stated herein. We assume no obligation to update this statement on any events subsequent to its issue, which may have a material effect on the discussions herein.

We do not express any opinion or provide any assurance as to whether:

- the Company or its Shareholders will continue to obtain these benefits in future;
- the conditions prescribed for availing the benefits, where applicable have been/would be met;
- The revenue authorities/courts will concur with the views expressed herein.



We hereby give our consent to include enclosed statement regarding the tax benefits available to the Company and to its shareholders in the DRHP for the proposed public offer of equity shares which the Company intends to submit to the Securities and Exchange Board of India provided that the below statement of limitation is included in the offer document.

#### **Limitations**

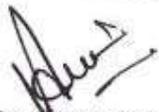
*Our views expressed in the statement enclosed are based on the facts and assumptions indicated above. No assurance is given that the revenue authorities/courts will concur with the views expressed herein. Our views are based on the information, explanations and representations obtained from the Company and on the basis of our understanding of the business activities and operations of the Company and the interpretation of the existing tax laws in force in India and its interpretation, which are subject to change from time to time. We do not assume responsibility to update the views consequent to such changes. Reliance on the statement is on the express understanding that we do not assume responsibility towards the investors who may or may not invest in the proposed issue relying on the statement.*

The enclosed Annexure is intended solely for your information and for inclusion in the Red Herring Prospectus/ Prospectus or any other issue related material in connection with the proposed issue of equity shares and is not to be used, referred to or distributed for any other purpose without our prior written consent.

The certificate is issued solely for the limited purpose to comply with Indian [ICDR Regulations]. Our work has not been carried out in accordance with auditing or other standards and practices generally accepted in jurisdictions outside India (including in the United States of America), and accordingly should not be relied upon as if it had been carried out in accordance with those standards and practices. This report should not be relied upon by prospective investors outside India (including persons who are Qualified Institutional Buyers as defined under (i) Rule 144A or (ii) Regulation S under the United States Securities Act of 1933, as amended) participating in the Offering. We accept no responsibility and deny any liability to any person who seeks to rely on this report and who may seek to make a claim in connection with any offering of securities on the basis that they had acted in reliance on such information under the protections afforded by United States of America law and regulation or any other laws other than laws of India.

Signed in terms of our separate report of even date.

For RGAR & Associates.  
Chartered Accountants  
Firm Reg No: 007070N  
Peer Review Certificate: 017397



(CA Amit Rastogi)  
Partner

Membership Number: 502008



UDIN: 25502008BMGJYQ9315  
Date: 13-08-2025  
Place: Ghaziabad

## **Annexure to the statement of possible Tax Benefits**

Outlined below are the possible Special tax benefits available to the Company and its shareholders under the Income Tax Act, 1961 presently forced in India. It is not exhaustive or comprehensive and is not intended to be a substitute for professional advice. Investors are advised to consult their own tax consultant with respect to the tax implications of an investment in the Equity Shares particularly in view of the fact that certain recently enacted legislation may not have a direct legal precedent or may have different interpretation on the benefits, which an investor can avail.

**YOU SHOULD CONSULT YOUR OWN TAX ADVISORS CONCERNING THE INDIAN TAX IMPLICATIONS AND CONSEQUENCES OF PURCHASING, OWNING AND DISPOSING OF EQUITY SHARES IN YOUR PARTICULAR SITUATION.**

### **1. Special Tax Benefits available to the Company under the Act:**

#### **(i) Section 115BA – Tax on certain income of domestic companies.**

Section 115BA has been introduced in Union budget 2016. Section 115BA of the act grants an option to domestic company to be governed by the section from particular assessment year. If a company opts for section 115BA of the act, it shall pay corporate tax at a reduced rate of 25% (plus surcharge and education cess).

The company has evaluated and decided to opt for the lower corporate tax rate at 25% (plus applicable surcharge and cess) with effect from financial year 2021-2022 relevant to Assessment year 2022-2023 under section 115BA of the act. Such option has been exercised by the company while filing return for financial year 2021-2022 relevant to Assessment year 2022-2023 within the due date prescribed under sub section (1) of section 139 of the Act.

#### **(ii) Section 80IB - Deduction in respect of Profit & Gain from certain Industrial Undertaking other than Infrastructure Development Undertaking**

The deduction under this section is available to an assessee whose Gross Total Income includes any profits and gains derived from the business of:

1. Commercial production and refining of mineral oil;
2. Processing, preservation and packaging of fruits or vegetables, meat and meat products or poultry or marine or dairy products;
3. Integrated business of handling, storage and transportation of food grains;
4. Operating and maintaining a hospital located anywhere in India other than the excluded area.

Company will be eligible for 100% deduction of eligible profits in first five years and for 30% deduction of eligible profits in the next five years.

Since the company was engaged in prescribed business it availed the benefit of Section 80IB.

#### **(iii) Section 115JB – Special Provisions for the payment of tax by certain companies.**

Notwithstanding anything contained in any other provision of act, wherein the case of any assessee, being a company, the income tax , payable on total income as computed under the act in respect of any previous year relevant to assessment year commencing on or after the first day of April, 2020, is less than 15% of its book profit, such book profit shall be deemed to be the total income of the assessee and the tax payable by the assessee on such total income shall be the amount of income tax at the rate of than 15%. The tax payable under MAT shall be increased by applicable surcharge and education cess.

Book Profit means the net profit as shown in the profit & loss account for the year as increased and decreased by some items as prescribed under the act. When any amount of tax is paid as MAT by the



company than it can claim the credit of such tax paid in accordance with the provision of section 115JAA ('MAT Credit').

MAT credit will be difference of tax paid as per MAT calculation and income tax payable under normal provision of income tax act. Such MAT credit shall be eligible to be carried forward and set off for fifteen Assessment years immediately succeeding the assessment year in which such credit has become allowable. Set off of MAT Credit shall be allowed for any assessment year to the extent of difference between tax payable as per normal provision of the act and MAT calculated as per section 115JB of the act.

## 2. Special Tax Benefits available to the shareholders of the Company

As per section 112A of the Act, long-term capital gains arising from transfer of an equity share, or a unit of an equity-oriented fund or a unit of a business trust shall be taxed at 10% / 12.5% (without Indexation) of such capital gains subject to fulfilment of prescribed conditions under the Act as well.

As per Budget 2025. It is worthwhile to note that tax shall be levied where such capital gains exceed INR 125,000.

As per section 111A of the Act, short term capital gains arising from transfer of an equity share, or a Unit of an equity-oriented fund or a unit of a business trust shall be taxed at 15% / 20% subject to fulfilment of prescribed conditions under the Act.

In respect of non-resident shareholders, the tax rates and the consequent taxation shall be further subject to any benefits available under the applicable Double Taxation Avoidance Agreement, if any, between India and the country in which the non-resident has fiscal domicile. Except for the above, the Shareholders of the Company are not entitled to any other special tax benefits under the Act.

### Notes:

1. All the above benefits are as per the current tax laws and will be available only to the sole / first name holder where the shares are held by joint holders.
2. The above statement covers only certain relevant direct tax law benefits and does not cover any indirect tax law benefits or benefit under any other law.

No assurance is given that the revenue authorities/courts will concur with the views expressed herein. Our views are based on the existing provisions of law and its interpretation, which are subject to changes from time to time. We do not assume responsibility to update the views consequent to such changes. We do not assume responsibility to update the views consequent to such changes. We shall not be liable to any claims, liabilities or expenses relating to this assignment except to the extent of fees relating to this assignment, as finally judicially determined to have resulted primarily from bad faith or intentional misconduct. We will not be liable to any other person in respect of this statement.

