

# SARUPRIA SOMANI & ASSOCIATES

Chartered Accountants

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To,

The Board of Directors

Rukmani Devi Garg Agro Impex Limited ("The Company"),

Plot No. 07, Bhama Shah Mandi,

Anantpura, Kota, Rajasthan, 324005

Dear Sir,

**Subject: Statement of possible tax benefits ('the Statement') available Rukmani Devi Garg Agro Impex Limited, (formerly known as Rukmani Devi Garg Agro Impex Private Limited) ("the Company") and its shareholders prepared in accordance with Securities and Exchange Board of India (Issue of Capital Disclosure Requirements) Regulations 2018, as amended ('the Regulation')**

We hereby confirm that the enclosed Annexure 1 and 2 (together "the Annexures"), prepared by the Company, provides the possible tax benefits available to the Company and to the shareholders of the Company under the Income-tax Act, 1961 ("the Act") as amended by the Finance Act 2024, circular and notifications issued from time to time, i.e. applicable for the Financial Year 2024-25 relevant to the assessment year 2025-26, the Central Goods and Services Tax Act, 2017 the Integrated Goods and Services Tax Act, 2017 ("GST Act"), as amended by the Finance Act 2024 circular and notifications issued from time to time, i.e., applicable for the Financial Year 2024-25 relevant to the assessment year 2025-26 respectively, presently in force in India (together, the "Tax Laws"). Several of these benefits are dependent on the Company or its shareholders fulfilling the conditions prescribed under the relevant provisions of the Tax Laws. Hence, the ability of the Company and / or its shareholders to derive the tax benefits is dependent upon their fulfilling such conditions which, based on business imperatives the Company faces in the future, the Company or its shareholders may or may not choose to fulfil.

1. The benefits discussed in the enclosed Annexures are not exhaustive and the preparation of the contents stated is the responsibility of the Company's management. We are informed that these Annexures are only intended to provide information to the investors and are neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of the tax consequences and 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 proposed initial public offering.
2. We do not express any opinion or provide any assurance as to whether:
  - i) the Company or its shareholders will continue to obtain these benefits in future;
  - ii) the conditions prescribed for availing the benefits have been / would be met with; and
  - iii) the revenue authorities/courts will concur with the views expressed herein.

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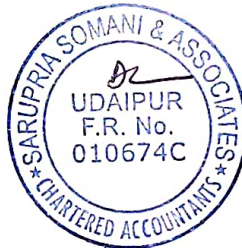
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3. The contents of the enclosed Annexures are based on information, explanations and representations obtained from the Company and on the basis of their understanding of the business activities and operations of the Company.
4. No assurance is given that the revenue authorities/ Courts will concur with the view expressed herein. Our views are based on existing provisions of law and its implementation, which are subject to change from time to time. We do not assume any responsibility to update the views consequent to such changes.
5. 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.
6. This certificate is provided solely for the purpose of assisting the addressee Company in discharging its responsibility under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 for inclusion in Updated Draft Red Herring Prospectus/ Red Herring Prospectus / Prospectus 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 written consent.

For and on behalf of  
**Sarupria Somani & Associates**  
Chartered Accountants  
FRN: 010674C

**CA Devendra Kumar Somani**  
Partner  
Membership No: 079558



Place: CAMP KOTA

Date: 23/8/25

UDIN: 25079558 BML ZBQ 6515



## ANNEXURE I TO THE STATEMENT OF TAX BENEFITS

The information provided below sets out the possible special tax benefits available to the Company and the Equity Shareholders under the Income Tax Act presently in force 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 a 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**

### A. SPECIAL TAX BENEFITS TO THE COMPANY

#### 1. Lower corporate tax rate under section 115BAA of the ITA

Section 115BAA inserted w.e.f 1 April 2020 (AY 2020-21), provides an option to a domestic company to pay corporate tax at a reduced rate of 22% (plus applicable surcharge (10%) and education cess (4%)).

In case the Company opts for the concessional income tax rate as prescribed under section 115BAA of the ITA, it will not be allowed to claim any of the following deductions/ exemptions:

1. Deduction under the provisions of Section 10AA (deduction for units in Special Economic Zone);
2. Deduction under clause (iia) of subsection (1) of Section 32 (Additional Depreciation);
3. Deduction under Section 32AD or Section 33AB or Section 33ABA (Investment allowance in backward areas, investment deposit account, site restoration fund);
4. Deduction under sub-clause (ii) or sub-clause (ii a) or sub-clause (iii) of sub section (1) or sub section (2AA) or sub section (2AB) of section 35 (Expenditure on scientific research);
5. Deduction under section 35 AD or section 35CCC (deduction for specified business, agricultural extension projects);
6. Deduction under section 35CCD (expenditure on skill development)
7. Deduction under any provision of Chapter VI-A other than the provision of section 80JJAA (Deduction in respect of employment of new employees) and 80M (Deduction in respect of certain inter corporate dividends);
8. No set-off of any loss carried forward or depreciation from any earlier assessment year, if such loss or depreciation is attributed to any of the deductions referred above;
9. No set-off of any loss or allowances for unabsorbed depreciation deemed so under Section 72A, if such loss or depreciation is attributable to any of the deductions referred above.

The provision of Section 115JB regarding Minimum Alternate Tax ("MAT") are not applicable if the company opts for the concessional income tax rate as prescribed under Section 115BAA of the ITA. Consequently, the company will not be entitled to claim tax credit relating to MAT.

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## 2. Deduction in respect of certain inter-corporate dividends under Section 80M of the ITA

As per section 80M of ITA, domestic companies have declared dividend and are also in receipt of the dividend from another domestic company or a foreign company or a business trust, deduction is allowed with respect to the dividend received as long as the same is distributed as dividend one month prior to the due date of furnishing the return of income under sub-section (1) of section 139 of ITA.

The deduction under section 80M is available even if domestic company opts for concessional tax rate under Section 115BAA of the ITA.

The company is eligible to avail Section 80M of the ITA.

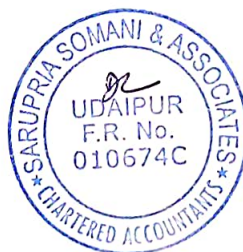
### B. SPECIAL TAX BENEFITS TO THE SHAREHOLDER

There is no special Income Tax benefit available to the shareholders of the Company for investing in the shares of the Company.

#### Note:

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.

We hereby give our consent to include our above referred opinion regarding the tax benefits available to the Company and to its shareholders in the Updated Draft Red Herring Prospectus/Red Herring Prospectus /Prospectus.



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## ANNEXURE 2 TO THE STATEMENT OF TAX BENEFITS

The information provided below sets out the possible special tax benefits available to the Company and the Equity Shareholders under the Indirect Tax presently in force 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 a 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**

### A. SPECIAL TAX BENEFITS TO THE COMPANY

**Benefit under the Central Goods and Services Act, 2017 (CGST Act), respective State Goods and Services Act, 2017 (SGST Act) and Integrated Goods and Services Act, 2017 (IGST Act) (read with relevant rules and prescribed thereunder)**

Export of Goods under the GST law

Under the GST regime, supplies of goods and services that qualify as exports are zero-rated. On account of the zero-rating of supplies, the supplier is entitled to claim Input Tax Credit (ITC) in respect of input and input services used for such supplies and can seek a refund of accumulated/ unutilized ITC.

However, the company deals in exempted goods as well as taxable goods, and accordingly, Input Tax Credit is being claimed proportionately.

### B. SPECIAL TAX BENEFITS TO THE SHAREHOLDER

There are no special indirect tax benefits available to the shareholders of the Company by virtue of their investment in the Company.

#### Note:

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 indirect tax law benefits and does not cover any direct tax law benefits or benefits under any other law.

We hereby give our consent to include our above-referenced opinion regarding the tax benefits available to the Company and to its shareholders in the Updated Draft Red Herring Prospectus / Red Herring Prospectus/Prospectus.



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