

**To Whomsoever It may Concern**

**March 31, 2026**

**Subject: Disclosure of Penalty orders received from National Faceless Assessment Centre, Income Tax Department, Ministry of Finance, Government of India.**

The Company is a Non-Banking Finance Company – Infrastructure Debt Fund (NBFC - IDF) (“the Company”) registered with the Reserve Bank of India since September 22, 2014.

As per provisions of Income Tax Act, 1961 (“the Act”), any income of NBFC-IDF, notified by the Central Government in the Official Gazette, is exempt from Income Tax.

During the years FY 2015-16 till FY 2018-19 (until grant of The Central Board of Direct Taxes (“CBDT”) notification to the Company), the Company claimed tax exemption under the bona fide belief that the tax exemption shall be granted retrospectively.

The CBDT notified the Company as tax exempt under section 10(47) of the Act, 1961 w.e.f. FY 2019-20. Upon receipt of notification, the Company suo-moto discharged the entire tax liability with interest amounting to Rs. 108.01 crores and simultaneously filed an application with CBDT to get notified as exempted IDF with retrospective effect from FY 2015-16.

The Company is in receipt of penalty orders u/s 271(1)(c) and 270A of the Act, wherein monetary penalties aggregating to Rs. 99.91 crores have been levied for the stated financial years.

The Company is in the process of filing necessary appeals under Part A of Chapter XX of the Act, to The National Faceless Assessment Centre within the prescribed timelines.

Based on merits of the case and the judicial precedents, the Company believes that it has adequate factual and legal grounds to reasonably substantiate its position in the matter. Accordingly, the Company expects the demand to subside. As such, there is no impact on financial operations or other activities of the Company.

Readers may refer Note 4 of Financial Statement notes for year ended March 2025 for disclosures provided to this effect.