

CA Devpura Navlakha & Co.

Chartered Accountants

401, Ashoka Complex, Nr. Golden Triangle, Sardar Patel Stadium Road, Navrangpura, Ahmedabad-380014.

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To,
The Board of Directors,
Sanginita Chemicals Limited
301, 3rd Floor, Shalin Complex,
Sector 11, Gandhinagar - 382 011.

Dear Sir/ Madam,

Subject: Statement of possible Tax Benefits available to M/s Sanginita Chemicals Limited and its shareholders in connection with the proposed Rights Issue of equity shares of the face value of Rs. 10/- each (hereinafter referred to as "Issue" or "Rights Issue") pursuant to SEBI – ICDR Regulations, 2018 as amended and the Companies Act, 2013 as amended.

This certificate is issued in accordance with the terms of our engagement letter dated 05/08/2023

The preparation of the Statement is the responsibility of the management of the Company for the 'Issue', including the preparation and maintenance of all accounting and other relevant supporting records and documents. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation and presentation of the Statement and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.

We have complied with the Code of Ethics issued by the Institute of Chartered Accountants of India. We have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, 'Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information and Other Assurance and Related Services Engagements,' issued by the ICAI.

The Management of the Company has prepared 'Statement of possible special tax benefits' under direct tax laws i.e. Income Tax Act, 1961 ('Income Tax Laws'), and indirect tax laws i.e. the Central Goods and Services Tax Act, 2017, Integrated Goods and Services Tax Act, 2017 respective State Goods and Services Tax Act, 1962, Customs Tariff Act, 1975 as amended, the rules and regulations, circulars and notifications issued there under, Foreign Trade Policy presently in force in India available to the Company and its shareholders.

The Company has requested us to confirm statement attached in the Annexure I and II are available to the Company and its shareholders. We hereby confirm that the enclosed Annexure, prepared by the Company, provides the possible special tax benefits available to the Company. The benefits discussed in the enclosed Statement cover only special tax benefits available to the Company and to the shareholders of the Company and are not exhaustive and also do not cover any general tax benefits available to the Company. Further, any benefits available under any other laws within or outside India have not been examined and covered by this Statement.

This statement is only intended to provide general information to the investors and is 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 Issue. Neither are we suggesting nor advising the investor to invest in the Issue based on this statement.

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

1. The Company or its shareholders will continue to obtain these benefits in future; or
2. The conditions prescribed for availing the benefits have been/would be met with.

The contents of the enclosed statement are based on information, explanations and representations obtained from the Company and on the basis of our understanding of the business activities and operations of the Company.



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We hereby consent to the extracts of this certificate being used in the Letter of offer / letter of offer of the Company in connection with the Issue or in any other documents in connection with the Issue, and the submission of this certificate as may be necessary, to any regulatory authority and / or for the records to be maintained by the Company in connection with the Issue and in accordance with applicable law, and for the purpose of any defence the Company may wish to advance in any claim or proceeding in connection with the contents of the Offer Documents.

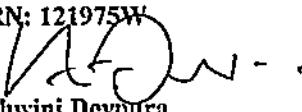
This certificate may also be relied upon by the Company, their affiliates and the legal counsel in relation to the Issue.

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.

The above certificate shall not be used for any other purpose without our prior consent in writing and we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this certificate is shown or into whose hands it may come without our prior consent in writing.

Yours faithfully,

For Devpura Navlakhia & Co.
Chartered Accountants
FRN: 121975W


Ashwini Devpura
(Partner)
M. No. 047390
UDIN: 23047390BGQPYJ9655



Place: Ahmedabad
Date: 11/08/2023

STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO SANGINITA CHEMICALS LIMITED ('COMPANY') AND ITS SHAREHOLDERS


1. Under the Income Tax Act, 1961 ('Act')

- a. **Special tax benefits available to the Company under the Act**
There are no special tax benefits available to the Company.
- b. **Special tax benefits available to the shareholders under the Act**
There are no special tax benefits available to the shareholders of the Company.

Notes

1. The above Statement sets out the provisions of law in a summary manner only and is not a complete analysis or listing of all potential tax consequences of the purchase, ownership and disposal of shares;
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;
3. The above statement of possible tax benefits is as per the current direct tax laws relevant for the assessment year 2024-25;
4. This statement is intended only to provide general information to the investors and is neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of tax consequences, each investor is advised to consult his/her own tax advisor with respect to specific tax consequences of his/her investment in the shares of the Company;
5. In respect of non -residents, the tax rates and consequent taxation will be further subject to any benefits available under the relevant DTAA, if any, between India and the country in which the non-resident has fiscal domicile;
6. 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;

For Devpura Navlakha & Co.
Chartered Accountants
FRN: 121975W


Ashwini Devpura
(Partner)
M. No. 047390
UDIN: 23047390BGQPYJ9655
Place: Ahmedabad
Date: 11/08/2023



STATEMENT OF INDIRECT TAX BENEFITS AVAILABLE TO SANGINITA CHEMICALS LIMITED ('COMPANY') AND ITS SHAREHOLDERS

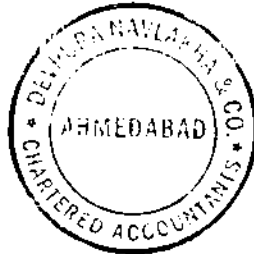
1. Under the Central Goods and Services Tax Act, 2017/ the Integrated Goods and Services Tax Act, 2017 ('GST Act'), the Customs Act, 1962 ('Customs Act') and the Customs Tariff Act, 1975 ('Tariff Act') (collectively referred to as 'Indirect Tax')
 - a. **Special tax benefits available to the Company under the Indirect Tax**
There are no special tax benefits available to the Company.
 - b. **Special tax benefits available to the shareholders under the Indirect Tax**
There are no special indirect tax benefits applicable in the hands of shareholders for investing in the shares of the Company.

Notes

1. The above statement is based upon the provisions of the specified Indirect Tax laws, and judicial interpretation thereof prevailing in the country, as on the date of this Annexure;
2. The above statement covers only above-mentioned Indirect Tax laws benefits and does not cover any direct tax law benefits or benefit under any other law;
3. This statement is intended only to provide general information to the investors and is neither designed nor intended to be a substitute for professional tax advice;
4. 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;

**For Devpura Navlakha & Co.
Chartered Accountants
FRN: 121975W**

**Ashwini Devpura
(Partner)
M. No. 047390
UDIN: 23047390BGQPYJ9655**



**Place: Ahmedabad
Date: 11/08/2023**