

**STATEMENT OF POSSIBLE SPECIAL TAX BENEFITS**

**Date: August 06, 2025**

**The Board of Directors,  
Sunshield Chemicals Limited**  
1501-A, Universal Majestic,  
P. L. Lokhande Marg,  
Mumbai 400043

Dear Sir/Ma'am,

**Re: Proposed rights issue of equity shares of face value of Rs. 10/- each ("Equity Shares") of Sunshield Chemicals Limited ("Company" and such rights issue, the "Issue").**

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This certificate is issued in accordance with the terms of our engagement letter dated August 21, 2024 read with letter dated August 01, 2025 with the Company in the context of the Issue in accordance with Chapter III of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the **"SEBI ICDR Regulations"**) and applicable provisions of the Companies Act, 2013, as amended (the **"Companies Act"**).

We report that the enclosed statements in **Annexure I and Annexure II**, state the possible special tax benefits under direct tax laws i.e. Income-tax Act, 1961 and Income tax Rules, 1962 including amendments made by the Finance Act, 2025 (hereinafter referred to as **"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, 2017, Customs Act, 1962, Customs Tariff Act, 1975 (hereinafter referred to as **"Indirect Tax Laws"**) as amended, including the relevant rules and regulations, circulars and notifications issued there under, Foreign Trade Policy force in India, available to the Company and its shareholders. Several of these benefits are dependent on the Company, its shareholders as the case may be, fulfilling the conditions prescribed under the relevant provisions of the statute. Hence, the ability of the Company, its shareholders, to derive the special tax benefits is dependent upon their fulfilling such conditions, which based on business imperatives the Company and its shareholders faces in the future, the Company and its shareholders may or may not choose to fulfill.

We confirm that the information herein is true, fair, correct, complete, accurate, not misleading and does not contain any untrue statement of a material fact nor omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading and adequate to enable investors to make a well informed decision.

We confirm that while providing this certificate, we have complied with the Code of Ethics issued by the Institute of Chartered Accountants of India. We also 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 benefits discussed in the enclosed statements cover only special tax benefits available to the Company and to the shareholders of the Company and are not exhaustive and do not cover any general tax benefits available to

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the Company or its shareholders. The tax benefits listed herein are only the possible special tax benefits which may be available under the current direct tax laws presently in force in India. Further, any benefits available under any other laws within or outside India have not been examined and covered by this Statement.

The benefits discussed in the enclosed statements in **Annexure I and Annexure II** are not exhaustive. The preparation of the contents stated in these Annexures is the responsibility of the Company's management. 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:

- (i) The Company or its shareholders will continue to obtain these benefits in future; or
- (ii) The conditions prescribed for availing of the benefits, where applicable, have been/would be met with.
- (iii) There venue authorities/courts will concur with the views expressed herein

The statement is intended solely for information and the inclusion in the Draft Letter of Offer & Letter of Offer in connection with the Rights Issue of Equity Shares of the Company and is not be used, referred to or distributed for any other purpose, without our prior consent, provided the below statement of limitation is included in the Offer Letter.

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.

We also consent to the references to us as "Experts" as defined under Section 2(38) of the Companies Act, 2013, read with Section 26(5) of the Companies Act, 2013 to the extent of the certification provided hereunder and included in the Draft Letter of Offer and the Letter of Offer ("**Offer Documents**") of the Company or in any other documents in connection with the Issue.

We hereby give consent to include this statement of special tax benefits in the Offer Documents and in any other material used in connection with the Issue.

This certificate may be relied on by the legal counsel to the Issue. We confirm that we will immediately inform the legal counsel to the Issue of any changes to the above information in writing until the date when the Equity Shares issued pursuant to the Issue commence trading on the BSE Limited (the "**Stock Exchange**"). In the absence of any such communication from us, the above information should be considered as updated information until the Equity Shares issued pursuant to the Issue commence trading on the Stock Exchanges.

We hereby consent to (a) the extracts of this certificate being used in the draft letter of Offer and/or letter of offer or any other material in connection with the Issue; and / or (b) submission of this certificate as may be

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# CNK & Associates LLP

## Chartered Accountants

necessary, to the Stock Exchange or to any regulatory authority and for the purpose of, but not limited to, any defence the legal counsel may wish to advance in any claim or proceedings in connection with the Issue or contents of the Issue related documents; and / or

(c) the use of this certificate for the records maintained by the legal counsel in connection with the Issue and in accordance with applicable law

We undertake to immediately update you, in writing, of any changes in the above mentioned information until the date the Equity Shares issued pursuant to the Issue commence trading on the recognized stock exchange. In the absence of any such communication, you may assume that there is no change in respect of the matters covered in this certificate until the date the Equity Shares commence trading on the recognized stock exchange.

Yours faithfully,

**For and on behalf of**

M/s C N K & Associates LLP

**Chartered Accountants**

**Firm Registration Number:** 101961W/W100036

**Name:** Diwakar Sapre

Partner

**ICAI Membership Number:** 040740

**UDIN:** 25040740BMIGPR6508

**Cert No:** REF/CERT/C/393/25-26

**Date:** August 06, 2025

**Place:** Mumbai

**Encl: As above CC:**

**Legal Counsel to the**

**Issue Rajani Associates**

**Advocates and**

**Solicitors** 204-207

Krishna Chambers 59

New Marine Lines

Mumbai 400020

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## **ANNEXURE I**

### **STATEMENT OF POSSIBLE SPECIAL TAX BENEFITS AVAILABLE TO SUNSHIELD CHEMICALS LIMITED (THE “COMPANY”) AND ITS SHAREHOLDERS UNDER THE INCOME TAX ACT, 1961 (HEREINAFTER REFERRED TO AS “INCOME TAX LAWS”)**

#### **1. Special tax benefits available to the Company under the Income Tax Laws**

There are no special tax benefits available to the Company.

#### **2. Special tax benefits available to the shareholders under the Income Tax Laws**

There are no special tax benefits available to the shareholders of the Company.

#### **Notes:**

- a. 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.
- b. 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.
- c. The above statement of possible special tax benefits is as per the current direct tax laws relevant for the assessment year 2025-26.
- d. 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.
- e. 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.
- f. 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.

## **ANNEXURE II**

### **STATEMENT OF POSSIBLE SPECIAL TAX BENEFITS AVAILABLE TO SUNSHIELD CHEMICALS LIMITED (THE “COMPANY”) AND ITS SHAREHOLDERS UNDER THE CENTRAL GOODS AND SERVICES TAX ACT, 2017, INTEGRATED GOODS AND SERVICES TAX ACT, 2017, RESPECTIVE STATE GOODS AND SERVICES TAX ACT, 2017 (‘GST ACT), CUSTOMS ACT, 1962 (‘CUSTOM ACT’), CUSTOMS TARIFF ACT, 1975 (‘TARRIF ACT’) (HEREINAFTER REFERRED TO AS “INDIRECT TAX LAWS”)**

#### **1. Special tax benefits available to the Company under the Indirect Tax Laws**

There are no special indirect tax benefits available to the Company.

#### **2. Special tax benefits available to the shareholders under the Indirect Tax Laws**

There are no special indirect tax benefits applicable in the hands of shareholders for investing in the shares of the Company.

#### **Notes:**

- a. 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.
- b. 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.
- c. 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.
- d. 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.