

# Kheria & Company Chartered Accountants

## STATEMENT OF TAX BENEFITS

Date: March 15, 2026

To,  
The Board of Directors  
**Adon Agro Commodities Limited**  
(Formerly Known As "Adon Agro Commodities Private Limited")  
3rd Floor Office No. I-3029,  
Akshar Business Park, Plot Number 3, Sector 25, Vashi, Navi Mumbai, Thane,  
Maharashtra, 400703

**Galactico Corporate Services Limited**  
408, 93 East, Galactico Corporate Services Limited,  
Mahakali Caves Rd, Shanti Nagar,  
Andheri East, Mumbai,  
Maharashtra 400093  
(Galactico Corporate Services Limited, referred to as the "Book Running Lead Manager/BRLM")

Dear sir(s):

**Sub: Statement of Tax Benefit to be included in the Draft Red Herring Prospectus/Red Herring Prospectus/Prospectus for the Proposed Initial Public Issue of Adon Agro Commodities Limited (the "Company" and such offering, the "Issue")**

We hereby confirm that the enclosed Annexure I, prepared by Adon Agro Commodities Limited ('the Company'), which provides the Special tax benefits under direct tax and indirect tax laws presently in force in India, including the Income-tax Act, 1961, the Central Goods and Services Tax Act, 2017, the Integrated Goods and Services Tax Act, 2017, the Union Territory Goods and Services Tax Act, 2017, respective State Goods and Services Tax Act, 2017, Customs Act, 1962 and the Customs Tariff Act, 1975 (collectively the "Taxation Laws"), the rules, regulations, circulars and notifications issued thereon, as applicable to the assessment year 2026-27 and relevant to the financial year 2025-26 available to the Company and its shareholders. Several of these benefits are dependent on the Company or its shareholders fulfilling the conditions prescribed under the relevant provisions of the Taxation Laws. Therefore, 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.

This statement of possible special tax benefits is required as per Schedule VI (Part A)(9)(L) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended ('SEBI ICDR Regulations'). While the term 'special tax benefits' has not been defined under the SEBI ICDR Regulations, it is assumed that with respect to special tax benefits available to the Company, its shareholders the same would include those benefits as enumerated in the statement. The benefits discussed in the enclosed statement cover the possible special tax benefits available to the Company, its Shareholders and do not cover any general tax benefits available to them. Any benefits under the Taxation Laws other than those specified in the statement are considered to be general tax benefits and therefore not covered within the ambit of this statement. Further, any benefits available under any other laws within or outside India, except for those specifically mentioned in the statement, have not been examined and covered by this statement.

**Office:** 513, 5th Floor, Kosha Kommercial Komplex, Behind Laxmi Narayan Shopping Centre, Poddar Road, Malad (East), Mumbai-400 097, Mobile No. 9619831080;9321498143.  
Email - [kheriaandcompany@gmail.com](mailto:kheriaandcompany@gmail.com)



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.

In respect of non-residents, 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.

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 would have been met with; and
- the revenue authorities' courts will concur with the views expressed herein.

The Content 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.

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 updates 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.

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 the Draft Red Herring Prospectus/Red Herring Prospectus/Prospectus in connection with the proposed offer of equity shares and is not be used, referred to or distributed for any other purpose without our written consent.

Yours sincerely,

M/s Kheria & Company,  
Chartered Accountants  
FRN: 144903W

*Gheria*



CA Gourav Kheria  
Partner

M. No.: 175162

UDIN: 26175162 VY BMON 3783

Place: Mumbai

Date: March 15 2026

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In respect of non-residents, 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.

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 would have been met with; and
- iii. the revenue authorities' courts will concur with the views expressed herein.

The Content 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.

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Yours sincerely,

M/s Kheria & Company,  
Chartered Accountants  
FRN: 144903W

*Gourav Kheria*



CA Gourav Kheria  
Partner  
M. No.: 175162

UDIN: 26175162 VY BMON 3783

Place: Mumbai

Date: March 15 2026

## **ANNEXURE I TO THE STATEMENT OF TAX BENEFITS**

The information provided below sets out the possible special tax benefits available to the Company, the Shareholders under the Taxation Laws 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 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.

### **THE STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO THE COMPANY, ITS SHAREHOLDERS UNDER THE APPLICABLE TAX LAWS IN INDIA**

The information provided below sets out the possible tax benefits available to the Company and its Shareholders under the Income-tax Act, 1961 (the "Act") as amended by Finance Act, 2025 i.e. applicable for the Financial Year 2025-26 relevant to Assessment Year 2026-27.

#### **SPECIAL DIRECT TAX BENEFITS AVAILABLE TO THE COMPANY**

The following benefits are available to the Company while computing its total taxable income, after fulfilling conditions, as per the applicable provisions of the Act:

##### **1. LOWER CORPORATE TAX RATE UNDER SECTION 115BAA OF THE ACT**

Section 115BAA was inserted in the Act by the Taxation Laws (Amendment) Act, 2019 ('the Amendment Act, 2019') w.e.f. April 1, 2020 (Assessment Year 2020-21). Section 115BAA grants an option to a domestic company to be governed by the section from a particular assessment year. If a company opts for section 115BAA of the Act, it can pay corporate tax at a reduced rate of 22% (plus applicable surcharge and education cess).

Section 115BAA of the Act further provides that domestic companies availing the option will not be required to pay Minimum Alternate Tax ('MAT') on their 'book profit' under section 115JB of the Act. However, such a company will no longer be eligible to avail certain specified exemptions / incentives under the Act and will also need to comply with certain other conditions specified in section 115BAA of the Act.

If a company opts for section 115BAA, the tax credit (under section 115JAA), if any, which it was entitled to on account of MAT paid in earlier years, will no longer be available. Further, it shall not be allowed to claim set-off of any brought forward loss arising to it on account of additional depreciation and other specified incentives.

##### **1.1. DEDUCTION FROM GROSS TOTAL INCOME**

**Section 80JJAA-** Deduction in respect of employment of new employees

Subject to fulfilment of prescribed conditions the company is entitled to claim deduction under the provision of Section 80JJAA of the Act, of an amount equal to 30% of additional employee cost (related to specific category of employees) incurred in the course of business in the previous year, for 3 A.Y including the A.Y relevant to previous year in which such employment is employed.

##### **2. SPECIAL DIRECT TAX BENEFITS AVAILABLE TO THE SHAREHODERS**

There are no special tax benefits available to shareholder of the company.

##### **3. SPECIAL INDIRECT TAX BENEFITS AVAILABLE TO THE COMPANY**

The Company is not entitled to any special tax benefits under Indirect Tax laws.

##### **4. SPECIAL INDIRECT TAX BENEFITS AVAILABLE TO THE SHAREHOLDERS**

The shareholders of the company are not entitled to any special tax benefit under Indirect tax laws.



**Notes:**

1. The above statement of Direct and Indirect Tax Benefits sets out the special tax benefits available to the Company, its shareholders under the current tax laws presently in force in India.
2. 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, 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.
3. This statement does not discuss any tax consequences in the country outside India of an investment in the Shares. The subscribers of the Shares in the country other than India are urged to consult their own professional advisers regarding possible income-tax consequences that apply to them.
4. In respect of non-residents, the tax rates and the consequent taxation mentioned above 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.
5. The views expressed in this statement are based on the facts and assumptions as indicated in the statement. No assurance is given that the revenue authorities/courts will concur with the views expressed herein.

The views are based on the existing provisions of law and its interpretation, which are subject to change from time to time. We do not assume responsibility to update the views consequent to such change.

