

August 14, 2023

The Manager- Listing

**BSE Limited**

Corporate Relationship Dept., 5<sup>th</sup> Floor, New Trading Ring  
Rotunda Building, P J Towers, Dalal Street, Fort,  
Mumbai – 400 001

The Manager- Listing

**National Stock Exchange of India Limited**

Exchange Plaza, 5<sup>th</sup> Floor, Plot No. C/1, G Block  
Bandra – Kurla Complex, Bandra (E),  
Mumbai – 400 051

Dear Sir/Madam,

**Sub: Disclosure under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('SEBI Listing Regulations')**

We refer to the captioned matter and the recent amendments to Regulation 30 of the SEBI Listing Regulations pursuant to the SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2023 read with Circular no SEBI/HO/CFD-PoD-1/P/CIR2023/123 dated July 13, 2023. As per point 8 of Para B of Annexure - 1 to the circular referred above, a listed entity is required to disclose the pendency of any litigation/dispute or outcome thereof which may impact the listed entity. In this regard, we would like to inform the exchanges as below:

**Ongoing litigations and disputes prior to March 31, 2023:**

The ongoing litigations have been disclosed in the Annual report of the company for the financial year 2022-23, specific reference is drawn to the Independent Auditors report and Note no. 32 – Commitments and contingencies, of the financial statements. The disclosures therein contain the desired information about the pendency of litigations/disputes, and the same is disclosed as **Annexure – A**.

**Litigations and disputes arising from 1<sup>st</sup> of April 2023:**

The Company has received an order from the Transfer Pricing Officer being issued under section 92CA(3) the Income Tax Act, 1961 for assessment year 2020-21, wherein an adjustment on the legacy issues has been proposed. The estimated tax impact of the adjustments proposed is Rs. 10.36 crores (approx.). The said amount does not involve any interest or penal consequences. The company will suitably challenge the order in the due course.



The aforesaid disclosure has been made out on a conservative basis as the company is awaiting clarity on the reporting these aspects from SEBI. The company is in the process of formulating a detailed framework for reporting the disclosures to be made in accordance with the above circular.

You are requested to kindly take the above on your records.

Thanking You

For AstraZeneca Pharma India Limited

Manasa R  
Company Secretary

Enclosure – As referred above

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## Annexure - A

### Extract of Independent Auditor's report:

According to the information and explanations given to us and the records of the Company examined by us, there are no statutory dues of provident fund, employees' state insurance which have not been deposited on account of any dispute. The particulars of other statutory dues referred to in sub-clause (a) as at March 31, 2023, which have not been deposited on account of a dispute, are as follows:

<b>Name of the statute</b>	<b>Nature of dues</b>	<b>Gross demand (in Rs. million)</b>	<b>Amount paid under protest (in Rs. million)</b>	<b>Net amount (in Rs. million)</b>	<b>Period to which the amount relates</b>	<b>Forum where the dispute is pending</b>
<i>The Income Tax Act, 1961</i>	<i>Income Tax</i>	5.1	5.1	-	2009-10	<i>Assessing Officer of Income Tax</i>
	<i>Income Tax*</i>	6.2	6.2	-	2010-11	<i>Assessing Officer of Income Tax</i>
	<i>Income Tax**</i>	224.1	224.1	-	2013-14	<i>Assessing Officer of Income Tax</i>
	<i>Income Tax***</i>	141.4	141.4	-	2014-15	<i>Income Tax Appellate Tribunal</i>
	<i>Income Tax</i>	156.1	-	156.1	2015-16	<i>Income Tax Appellate Tribunal</i>
	<i>Income Tax</i>	312.1	-	312.1	2016-17	<i>Income Tax Appellate Tribunal</i>
	<i>Income Tax****</i>	68.4	19.5	48.9	2017-18	<i>Income Tax Appellate Tribunal</i>
	<i>Income Tax</i>	23.2	-	23.2	2019-20	<i>Commissioner of Income Tax (Appeals)</i>

<i>Name of the statute</i>	<i>Nature of dues</i>	<i>Gross demand (in Rs. million)</i>	<i>Amount paid under protest (in Rs. million)</i>	<i>Net amount (in Rs. million)</i>	<i>Period to which the amount relates</i>	<i>Forum where the dispute is pending</i>
<i>Punjab Value Added Tax Act, 2005</i>	<i>Value Added Tax (VAT)</i>	1.8	0.2	1.6	2006-07	<i>Honourable High Court of Punjab and Haryana</i>
<i>Customs Act, 1962</i>	<i>Custom duty</i>	21.2	-	21.2	2005-06	<i>Deputy Commissioner of Customs, Mumbai</i>
<i>The Finance Act, 1994</i>	<i>Service Tax</i>	25.6	1.8	23.8	2006-07 to 2011-12	<i>Central Excise and Service Tax Appellate Tribunal, Bangalore</i>
	<i>Service Tax</i>	4.9	0.2	4.7	2012-13	<i>Central Excise and Service Tax Appellate Tribunal, Bangalore</i>
	<i>Service Tax</i>	3.4	1.5	1.9	2013-14 to 2015-16	<i>Central Excise and Service Tax Appellate Tribunal, Bangalore</i>
	<i>Service Tax</i>	1.5	0.1	1.4	April 2016 to June 2017	<i>Commissioner of Central Excise (Appeals), Bangalore</i>
	<i>Service Tax</i>	51.6	1.9	49.7	December 2012 to March 2016	<i>Customs Excise and Service Tax Appellate Tribunal, Bangalore</i>

<i>Name of the statute</i>	<i>Nature of dues</i>	<i>Gross demand (in Rs. million)</i>	<i>Amount paid under protest (in Rs. million)</i>	<i>Net amount (in Rs. million)</i>	<i>Period to which the amount relates</i>	<i>Forum where the dispute is pending</i>
<i>Goods and Services Tax Act, 2017</i>	<i>Goods and Services Tax</i>	51.7	2.1	49.6	2017-18	<i>Joint Commissioner of State Tax (Appeals), Thane</i>
	<i>Goods and Services Tax</i>	211.0	9.2	201.8	2018-19	<i>Joint Commissioner of State Tax (Appeals), Thane</i>
<i>Bruhat Bangalore Mahanagara Palike (BBMP)</i>	<i>Improvement charges</i>	70.8	-	70.8	2014	<i>Honourable High Court of Karnataka</i>

*\*The Department has adjusted Rs. 6.2 million against refund of other assessment years and this has been included under "amount paid under protest".*

*\*\*The Company has paid Rs. 40 million under protest and the department has adjusted Rs. 187.3 million against refund of other assessment years. The amount paid under protest has been restricted to the extent of gross demand.*

*\*\*\*The Company has paid Rs. 24 million under protest and the department has adjusted Rs. 117.4 million against refund of other assessment years.*

*\*\*\*\* The Department has adjusted Rs. 19.5 million against refund of other assessment years and this has been included under "amount paid under protest".*

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**Extract of Note 32 of Financials at page no 131 of the Annual report 2022-23 :**

<b>Commitments and contingencies</b>			
Sl. No.	Particulars	As at 31 March 2023	As at 31 March 2022
<b>(a)</b>	<b>Commitments</b>		
	<b>Capital commitments</b>		
	Estimated amount of contracts remaining to be executed on capital account (net of advances) and not provided for	6.6	18.6
<b>(b)</b>	<b>Contingent liabilities</b>		
	<b>Claims against the company not acknowledged as debts</b>		

Particulars	As at 31 March 2023	As at 31 March 2022
Indirect tax matters*	371.1	350.7
Income tax matters #	931.4	863.0

**\*Indirect tax matters:**

The matters are related to demands (including interest and penalties, where applicable) raised by the Indirect tax authorities related to service tax and goods and services tax (GST) for earlier financial years.

The demands relating to service tax have been raised on expenses incurred in foreign currency, reimbursements from overseas group companies, recovery of notice period pay from former employees and ineligible input tax credit claimed on certain expenses. The GST demand pertains to certain category of medicines supplied by the Company. The Company has filed appeals before the relevant authorities against the above demands, which are pending for adjudication.

The Company believes that it has a strong case on merits to contest the aforesaid demands and that the ultimate outcome of these proceedings will not have a material adverse effect on the Company's financial position and results of operations.

**# Income Tax:**

These matters are related to demands (including interest, where applicable) raised during the current year and in earlier years by the Income tax authorities in respect of transfer pricing adjustments on transactions with overseas group companies, disallowance of certain expenses incurred, taxability of subvention receipt and certain expense reimbursements and certain other disallowances. These adjustments are largely of a repetitive nature across multiple assessment



years. The Company has filed appeals against these demands with various appellate forums, which are currently pending for adjudication.

The Company believes that its position on the aforesaid demands will likely be upheld in the appellate process and accordingly no provision has been made in the financial statements for such demands.

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