

**VEDANTA TAKES STEPS TO SETTLE ALL DISPUTES RELATED TO IMPOSITION OF
RETROSPECTIVE TAX**

London, 15 December 2021

In view of the recent amendments to the Indian Income Tax Act, 1961 vide the Taxation Laws (Amendment) Act, 2021, which nullifies the retrospective tax imposed by Finance Act, 2012, Vedanta Ltd., and all its related group entities have taken steps to settle disputes arising from Order dated March 11, 2015 passed by the Deputy Commissioner of Income tax, International Taxation, Circle – Gurgaon under Section 201(1)/(1A) of the Act with the Republic of India

In this regard, Vedanta Resources Ltd., along with its related group entities, have filed the required statutory forms and undertakings in the prescribed Form 1 under the Indian Income Tax Rules, 1962. The aforesaid forms and undertakings have been accepted by the jurisdictional commissioner, and accordingly, a certificate to this effect, as prescribed in Form No. 2 under Rule 11UF of the Indian Income Tax Rules, 1962 has been issued.

Pursuant to the declarations in the aforesaid forms and undertakings, Vedanta Ltd, subsidiary of Vedanta Resources Ltd has withdrawn the income tax appeal pending before the Delhi bench of the Income Tax Appellate Tribunal titled as Vedanta Ltd. v. Deputy Commissioner of Income Tax (International Taxation) ITA No. 5594/Del/2017 and also withdrawn writ petition filed before the Delhi High Court titled as Cairn India Ltd. v. Union of India & Ors., W.P. (C) 3342/2015.

Vedanta Resources Ltd. has filed the application seeking withdrawal of the claim and termination of the arbitral proceedings pending before the Permanent Court for Arbitration in the International Court of Justice, in PCA Case No 2016-05: Vedanta Resources Ltd v. The Republic of India.

Vedanta Resources Ltd. and its related group entities also declare that no further proceedings or claims shall be initiated in any court or tribunal whether in India or outside India, pursuant to fulfilment of conditions as prescribed in Rule 11UF of the Indian Income Tax Rules, 1962 read with the Taxation Laws (Amendment) Act, 2021,

Vedanta Resources Ltd. and its related group entities and parties further declare that

1. they forever irrevocably forgo any reliance on any right and provisions under any award, judgment, or court order pertaining to the relevant order or orders or under the relevant order or orders;
2. they have provided an undertaking, which includes a complete release of the Republic of India and any Indian Affiliates with respect to any award, judgment, or court order pertaining to the relevant order or orders or under the relevant order or orders, and with respect to any claim pertaining to the relevant order or orders;
3. the undertaking also includes an indemnity against any claims brought against the Republic of India or any India affiliate, contrary to the release; and
4. they confirm that they will treat any such award, judgment, or court order as null and void and without legal effect to the same extent as if it had been set aside by a competent court and will not take any action or initiate any proceeding or bring any claim based on that.

Pursuant to this, the Company is a step closure to close tax dispute on withholdings tax on cairn indirect transfer.

Related group entities are as under.

- a) Volcan Investments Limited
- b) Volcan Investments Cyprus Limited
- c) Vedanta Limited
- d) Vedanta Holdings Jersey Limited
- e) Vedanta Resources Cyprus Ltd
- f) Vedanta Resources Holdings Ltd
- g) Vedanta Resources Finance Ltd
- h) Finsider International Company Ltd
- i) Richter Holding Limited
- j) Welter Trading Limited
- k) Westglobe Limited
- l) Vedanta Holdings Mauritius II Limited
- m) Twinstar Holdings Limited
- n) Vedanta Holdings Mauritius Limited

This release is being done in terms of clause (k) of part M of Form 1 of rule 11UE (1) of Income Tax Rules 1962.