

R.G.N. PRICE & CO.
CHARTERED ACCOUNTANTS

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Kochi, Kollam & Kozhikode

Simpson's Buildings

861, Anna Salai,

Chennai - 600 002

29th November 2021

Statement of tax benefits

To,

The Board of Directors

Data Patterns (India) Limited

Block 2, Ground Floor,

Plot H9, Fourth Main Road,

SIPCOT IT Park, Siruseri, Chennai 603 103

Tamil Nadu, India

(the "**Company**")

JM Financial Limited

7th Floor, Cnergy,

Appasaheb Marathe Marg

Prabhadevi,

Mumbai 400 025

Maharashtra, India

IIFL Securities Limited

10th Floor, IIFL Centre

Kamala Mills, Senapati Bapat Marg

Lower Parel (West)

Mumbai- 400 013

Maharashtra, India

(collectively, with any other book running lead managers that may be appointed in connection with the Offer, the "**Book Running Lead Managers**" or "**BRLMs**")

Re: Proposed initial public offer of equity shares of face value of ₹ 2 each (the "Equity Shares") of the "Company" and such offer, the "Offer".

We, R.G.N.Price & Co., Chartered Accountants (Firm Registration Number: 002785S), Statutory Auditor of the Company, have been requested by the Company to report that the enclosed statement in the **Annexure**, states the possible special tax benefits, available to the Company and its shareholders, under the Income Tax Act, 1961, Income tax Rules, 1962 including amendments made by the Finance Act, 2020 and the Taxation Laws (Amendment) Act, 2020 ("Direct tax laws") and 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 and Foreign Trade Policy, as amended from time to time, the rules and regulations, circulars and notifications issued there under presently in force in India ("Indirect tax laws"), as on the date of this certificate.

Several of these benefits are dependent on the Company and its shareholders, fulfilling the conditions prescribed under the relevant provisions of the statute. Hence, the ability of the Company or its shareholders to derive the special tax benefits is dependent upon their fulfilling such conditions, which based on business imperatives the Company or its shareholders may face in the future, the Company and its shareholders may or may not choose to fulfill.

We confirm that the company does not have any subsidiary as at September 30,2021 and at the date of this certificate, either incorporated in India or abroad, of the Company, in terms of the Regulation 16, Regulation 24 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**ICDR Regulations**”)

The benefits discussed in the enclosed **Annexure** are not exhaustive. 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 Offer, particularly in view of the fact that 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. We are neither suggesting nor advising the investor to invest in the Offer based on this statement.

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

- (i) the Company and its shareholders will continue to obtain these benefits in future; or
- (ii) 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.

We hereby give consent to include this statement of special tax benefits in the draft red herring prospectus Red Herring Prospectus and Prospectus of the Company (collectively, “Offer Documents”), and in any other material used in connection with the Offer.

We hereby confirm that while providing this certificate we have complied with the Code of Ethics and 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 Institute of Chartered Accountants of India.

We have conducted our examination in accordance with the ‘Guidance Note on Audit Reports and Certificates for Special Purposes (Revised 2016)’ issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by ICAI.

This certificate is for information and for inclusion (in part or full) in the Offer Documents or any other Offer-related material, and may be relied upon by the Company, the BRLM and the legal advisors appointed by the Company and the BRLM in relation to the Offer. We hereby consent to the submission of this certificate as may be necessary to SEBI, the Registrar of Companies, Tamil Nadu at Chennai (“**RoC**”), the relevant stock exchanges, any other regulatory authority and/or for the records to be maintained by the BRLM and in accordance with applicable law.



We hereby consent to this certificate being disclosed by the BRLMs, if required (i) by reason of any law, regulation or order of a court or by any governmental or competent regulatory authority in connection with the contents of the Offer Document, or (ii) in seeking to establish a defence in connection with, or to avoid, any actual, potential or threatened legal, arbitral or regulatory proceeding or investigation in connection with the contents of the Offer Document.

We confirm that we will immediately communicate any changes in writing in the above information to the BRLM until the date when the Equity Shares commence trading on the relevant stock exchanges. In the absence of any such communication from us until the Equity Shares commence trading on the relevant stock exchanges, the BRLM and the legal advisors, can assume that there is no change to the above information pursuant to the Offer.

All capitalized terms used herein and not specifically defined shall have the same meaning as ascribed to them in the Offer Documents.

Limitations

Our views expressed in the statement enclosed are based on the facts and assumptions indicated above. 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 change from time to time. We do not assume responsibility to update the views consequent to such changes. Reliance on the statement is on the express understanding that we do not assume responsibility towards the investors who may or may not invest in the proposed Issue relying on the statement. This statement has been prepared solely in connection with the proposed Offer by the Company under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended.

For **R.G.N. Price & Co.**
Chartered Accountants
FR No. 002785S



K. Venkatakishnan
Partner
M.No. 208591
UDIN: 21208591AAAAKX9652

Cc:

Domestic Legal Counsel to the Company	Domestic Legal Counsel to the BRLMs
J. Sagar Associates Sandstone Crest, Opposite Park Plaza Hotel Sushant Lok-1, Gurugram 122 009 Haryana, India	AZB & Partners AZB House, Peninsula Corporate Park Ganpatrao Kadam Marg, Lower Parel Mumbai 400 013

ANNEXURE

I. UNDER THE INCOME-TAX ACT, 1961 (hereinafter referred to as 'the IT Act')

1. Special tax benefits available to the Company under the IT Act

For the purpose of the Offer, there are no special tax benefits available to the Company.

2. Special tax benefits available to the Shareholders under the IT Act

For the purpose of the Offer, 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 tax benefits is as per the current direct tax laws relevant for the assessment year 2022-23.
- 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.

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.



II. 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”)

1. Special indirect tax benefits available to the Company.

For the purpose of the Offer, there are no special indirect tax benefits available to the Company.

2. Special indirect tax benefits available to the shareholders

For the purpose of the Offer, 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 tax laws benefits and does not cover any income 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. 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.
- 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.

