

**Independent Auditor's Report**

To the Partners of  
**SARDA HYDRO POWER LLP**

**Report on the Audit of the Financial Statements**

**Opinion**

We have audited the Ind AS financial statements of **Sarda Hydro Power LLP** ("the LLP"), which comprise the balance sheet as at 31st March 2023 the Statement of Profit and Loss ,the statement of changes in other reserves and the statement of Cash flows for the year ended on that date, and notes to the financial statements, including a summary of significant accounting policies and other explanatory information (here-in-after referred to as "Ind AS financial statements").

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid Ind AS financial statements give the information in the manner so required and give a true and fair view in accordance with the generally accepted accounting principles including the Indian Accounting Standards('IndAS'), of the state of affairs(financial Position) of the LLP as at 31<sup>st</sup> March 2023, its loss (financial performance including other comprehensive income) and changes in reserves and its cash flows for the year ended on that date.

**Basis for Opinion**

We conducted our audit in accordance with the Standards on Auditing (SAs) issued by the Institute of Chartered Accountants of India. Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the LLP in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the financial statements and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## **Management's Responsibility for the Ind AS Financial Statements**

The Management of the LLP is responsible for the preparation of these Ind AS financial statements that give a true and fair view of the financial position, financial performance including other comprehensive income, cash flows and changes in reserves of the LLP in accordance with the Indian Accounting Standards (Ind AS) and Limited Liability Partnership Act 2008. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, Partners are responsible for assessing the LLP's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Partners either intends to liquidate the LLP or to cease operations, or has no realistic alternative but to do so.

The Management is also responsible for overseeing the LLP's financial reporting process.

## **Auditor's Responsibilities for the Audit of the Financial Statements**

Our objectives are to obtain reasonable assurance about whether the Ind AS financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the LLP's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the LLP to cease to continue as a going concern.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

#### **Other Matters**

The LLP being a partially owned subsidiary of Sarda Energy & Minerals Limited, whose financial statements are prepared in accordance with the Indian Accounting Standards ('Ind AS') notified under Section 133 of the Companies Act, 2013 ('the Act'), and other relevant provisions of the Act.

As per paragraph 19 of the Ind AS -110 "Consolidated Financial Statements" a parent shall prepare consolidated financial statements using uniform accounting policies for like transactions and other events in similar circumstances.

Accordingly, the standalone financial statements of the LLP for the year have been prepared in accordance with Ind AS, as applicable .

#### **Report on Other Legal and Regulatory Requirements**

1. We report that:

- a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
- b) in our opinion proper books of account as required by law have been kept by the LLP so far as it appears from our examination of those books;

- c) the balance sheet, the statement of profit and loss (including other comprehensive income), the statement of cash flows and the statement of changes in other reserves dealt with by this Report are in agreement with the books of account; and
- d) in our opinion, the aforesaid Ind AS financial statements comply with the Indian Accounting Standards ('Ind AS'), as applicable.

RAM PRASAD & CO.  
CHARTERED ACCOUNTANTS  
Firm's Registration No. 319232E

RAM PRASAD AGRAWALLA  
PARTNER  
Membership No. 054609  
UDIN :23054609BGVXYF4881

PLACE : CUTTACK  
DATE : 05.05.2023

**SARDA HYDRO POWER LLP****Balance Sheet as at 31st March, 2023**

	Particulars	Note	31.03.2023	31.03.2022
			₹	₹
	<b>ASSETS</b>			
(1)	<b>Non-current Assets</b>			
(a)	Property, Plant & Equipment		-	-
(b)	Intangible Assets under development	2	61,82,079	57,75,276
(c)	Financial Assets		-	-
(d)	Other Non- Current Assets	3	1,30,313	1,30,313
	<b>Total Non Current Assets</b>		<b>63,12,392</b>	<b>59,05,589</b>
(2)	<b>Current Assets</b>			
(a)	Inventories		-	-
(b)	Financial Assets			
(i)	Trade Receivables		-	-
(iii)	Bank, Cash & cash equivalents	4	1,74,438	5,46,713
(iii)	Loans & Advances		-	-
(c)	Current Tax Assets (Net)	5	-	7,397
(d)	Other Current Assets	6	-	-
	<b>Total Current Assets</b>		<b>1,74,438</b>	<b>5,54,110</b>
	<b>TOTAL ASSETS</b>		<b>64,86,830</b>	<b>64,59,699</b>
	<b>CONTRIBUTION AND LIABILITIES:</b>			
	<b>PARTNER'S FUNDS</b>			
(a)	Capital Contribution	7	50,82,000	50,82,000
(b)	Other Reserves	8		
(i)	Retained Earnings		(3,08,063)	(2,60,009)
	<b>Total Equity</b>		<b>47,73,937</b>	<b>48,21,991</b>
	<b>Liabilities</b>			
(1)	<b>Non-current Liabilities :</b>			
(a)	Financial Liabilities			
(i)	Borrowings	9	16,82,532	15,76,142
(ii)	Other Financial Liabilities		-	-
(b)	Provisions			
(c)	Deferred tax liabilities (Net)		-	-
(d)	Other non current liabilities		-	-
	<b>Total Non Current Liabilities</b>		<b>16,82,532</b>	<b>15,76,142</b>
(2)	<b>Current Liabilities</b>			
(a)	<b>Financial Liabilities</b>			
(i)	Borrowings		-	-
(ii)	Trade Payables		-	-
(iii)	Other financial liabilities		-	-
(b)	Other current liabilities	10	30,361	61,566
(c)	Provisions			
	<b>Total Current Liabilities</b>		<b>30,361</b>	<b>61,566</b>
	<b>TOTAL EQUITY AND LIABILITIES</b>		<b>64,86,830</b>	<b>64,59,699</b>

SIGNIFICANT ACCOUNTING POLICIES

1

For RAM PRASAD &amp; CO.

CHARTERED ACCOUNTANTS

Firm's Registration No. 319232E

For SARDA HYDRO POWER LLP

KAMAL KISHORE SARDA  
(Designated Partner)RAM PRASAD AGRAWALLA  
PARTNER  
ICAI M. NO. 054609PANKAJ SARDA  
(Designated Partner)Place : Cuttack  
Date: 05.05.2023Place : Raipur  
Date: 05.05.2023

**SARDA HYDRO POWER LLP**  
**Statement of profit and loss for the year ended 31st March 2023**

Sr No.	Particulars	Note	31.03.2023	31.03.2022
			₹	₹
I	Income from operations Other Income	11	4,06,803	17,01,200
II	<b>Total Income</b>		<b>4,06,803</b>	<b>17,01,200</b>
III	<b>Expenses</b>			
	Employee benefit expense		-	-
	Finance costs	12	1,28,774	14,860
	Depreciation and amortisation expense		-	-
	Operating and Other expenses	13	3,26,083	17,37,221
	<b>Total expenses</b>		<b>4,54,857</b>	<b>17,52,081</b>
IV	<b>Profit/(Loss) before tax (II-III)</b>		<b>(48,054)</b>	<b>(50,881)</b>
V	Income tax expense			
	- Current tax		-	-
	- Deferred tax		-	-
VI	<b>Profit/(Loss) for the period (IV-V)</b>		<b>(48,054)</b>	<b>(50,881)</b>
VII	<b>Other Comprehensive income for the year</b>			
	(i) Items that will not be reclassified to profit or loss			
	- Actuarial gain or losses on Defined Benefit Plans		-	-
	(ii) Income tax relating to items that will not be reclassified to			
	- Actuarial gain or losses on Defined Benefit Plans		-	-
	<b>Other comprehensive income for the year, net of tax</b>		<b>-</b>	<b>-</b>
VIII	<b>Total comprehensive income for the year</b>		<b>(48,054)</b>	<b>(50,881)</b>

SIGNIFICANT ACCOUNTING POLICIES

1

For RAM PRASAD & CO.  
 CHARTERED ACCOUNTANTS  
 Firm's Registration No. 319232E

For SARDA HYDRO POWER LLP

KAMAL KISHORE SARDA  
 (Designated Partner)

RAM PRASAD AGRAWALLA  
 PARTNER  
 ICAI M. NO. 054609

PANKAJ SARDA  
 (Designated Partner)

Place : Cuttack  
 Date: 05.05.2023

Place : Raipur  
 Date: 05.05.2023

**SARDA HYDRO POWER LLP****CASH FLOW STATEMENT FOR THE YEAR ENDED 31ST MARCH' 2023**

Particulars	31.03.2023	31.03.2022
	₹	₹
<b>Cash Flow from operating activities:</b>		
<b>Profit before tax</b>	<b>(48,054)</b>	<b>(50,881)</b>
<b>Adjustment to Reconcile net profit to net cash provided by operating activities</b>		
Interest Expenses & Bank Charges	1,28,774	14,860
<b>Operating Profit before Working Capital Changes</b>	<b>80,720</b>	<b>(36,021)</b>
<b>Movements in working capital:</b>		
Increase/(decrease) in other current liabilities	(31,205)	51,566
Decrease/(Increase) in current assets and current tax assets	7,397	(1,187)
<b>Cash generated from/ (used in) operations</b>	<b>56,912</b>	<b>14,358</b>
Direct taxes paid (Net of Refunds)	-	-
<b>Net Cash generated from/ (used in) operating Activities (A)</b>	<b>56,912</b>	<b>14,358</b>
<b>Cash flow from investing activities</b>		
Intangible Assets under development	(4,06,803)	(17,01,200)
<b>Net Cash generated from/ (used in) investing activities (B)</b>	<b>(4,06,803)</b>	<b>(17,01,200)</b>
<b>Cash flow from financing activities</b>		
Proceeds from long-term borrowings	1,06,390	15,76,142
Interest Expenses & Bank Charges	(1,28,774)	(14,860)
<b>Net cash flow from (used in) financing activities (C)</b>	<b>(22,384)</b>	<b>15,61,282</b>
<b>Net Increase(Decrease) in Cash &amp; Cash Equivalents (A+B+C)</b>	<b>(3,72,275)</b>	<b>(1,25,560)</b>
Cash and cash Equivalents at the beginning of the year	5,46,713	6,72,273
<b>Cash and Cash Equivalents at the end of the year</b>	<b>1,74,438</b>	<b>5,46,713</b>
<b>Components of cash and cash equivalents</b>		
Cash in hand	50,082	36,862
With bank in current account	1,24,356	5,09,851
<b>TOTAL CASH AND CASH EQUIVALENTS</b>	<b>1,74,438</b>	<b>5,46,713</b>

For RAM PRASAD & CO.  
**CHARTERED ACCOUNTANTS**  
 Firm's Registration No. 319232E

**RAM PRASAD AGRAWALLA**  
**PARTNER**  
 ICAI M. NO. 054609

Place : Cuttack  
 Date: 05.05.2023

For SARDA HYDRO POWER LLP

**KAMAL KISHORE SARDA**  
 (Designated Partner)

**PANKAJ SARDA**  
 (Designated Partner)

Place : Raipur  
 Date: 05.05.2023

## **SARDA HYDRO POWER LLP**

### **1 Significant accounting policies and notes to the accounts**

**For financial year ended 31st March 2023**

#### **1 Reporting Entity**

The LLP (LLP Identification No. AAO-4263) is domiciled in India and is incorporated under the provisions of Limited Liability Partnership Act, 2008. The LLP has obtained licenses for implementation of two Hydro Electric Projects, named 24 MW Kotaiveera SHP and 9 MW Ganeshpur SHP. Both the projects are in phase implementation. This LLP is formed by Conversion of Sarda Hydro Power Pvt. Ltd. into LLP w.e.f. 05 March 2019

#### **2 Basis of Preparation**

##### **2.1 Statement of compliance**

These financial statements are prepared in accordance with Indian Accounting Standards (Ind AS) notified under the Companies (Indian Accounting Standard Rules) 2015 and subsequent amendments thereto.

Accounting policies have been consistently applied except where a newly issued accounting standard is initially adopted or a revision to an existing accounting standard requires a change in the accounting policy hitherto in use.

##### **2.2 Basis of Measurement**

The financial statements have been prepared on the historical cost convention and on accrual basis .

##### **2.3 Use of estimate**

The preparation of financial statements in conformity with Ind AS requires the management to make Judgments, estimates and assumptions that affect the reported amounts of expenses, assets and Liabilities and the disclosure of contingent liabilities, at the end of the reporting period . Although these estimates are based on the management's best knowledge of current events and actions, uncertainty about these assumptions and estimates could result in the outcomes requiring a material adjustment to the carrying amounts of assets or liabilities in future periods. revisions to accounting estimates are recognised prospectively.

### **3 Summary of significant accounting policies:**

#### **3.1.1 Current v/s Non Current Classification**

The LLP presents assets and liabilities in the balance sheet based on current /non current classification as laid down in Ind AS.

#### **3.1.2 Financial Assets**

##### **i) Initial measurement**

All financial assets are recognised initially at fair value. Transaction costs that are attributable to the acquisition of the financial asset (other than financial assets recorded at fair value through profit or loss) are included in the fair value of the financial assets. Purchase or sales of financial assets that require delivery of assets within a time frame established by regulation or convention in the market place (regular way trade) are recognised on trade date.

##### **ii) Classification and subsequent measurement**

For the purpose of subsequent measurement, financial assets of the LLP are classified in the following categories:

- 1) financial assets measured at amortised cost
- 2) financial assets measured at fair value through other comprehensive income
- 3) financial assets measured at fair value through profit and loss and

The classification of financial assets depends on the objective of the business model. Management determines the classification of its financial assets at initial recognition.



### 3.1.3 Financial liability

#### i) Initial measurement

All financial liabilities are recognised initially at fair value, net of directly attributable transaction costs.

#### ii) Classification and subsequent measurement

For the purpose of subsequent measurement, financial assets of the LLP are classified in the following categories:

1) financial liabilities are measured at amortised cost

2) financial liabilities measured at fair value through profit and loss

### 3.2 Intangible Assets under Development

The LLP is in the process of implementation of hydro power projects. The expenditure incurred during the implementation stage of the projects is accounted under the head 'Intangible asset under development' in accordance with Appendix 'Service Concession Arrangements' C to Ind As-115, Revenue from Contracts with Customer.

### 3.3 Intangible Assets

Intangible Assets under development comprising Capital work in progress for projects under implementation are measured at cost of acquisition/ implementation / development.

### 3.4 Employee benefits

The payment of Bonus Act, Gratuity Act and Provident Fund Act are not applicable to the LLP during the year

### 3.5 Cash and cash equivalents

Cash and cash equivalents in the balance sheet comprise cash at banks and on hand and short-term deposits with a maturity of three months or less, which are subject to an insignificant risk of changes in value. For the purposes of the cash flow statement, cash and cash equivalents include cash on hand, in banks and demand deposits with banks, net of outstanding bank overdrafts that are repayable on demand, book overdraft and are considered part of the LLP's cash management system.

**SARDA HYDRO POWER LLP**
**Notes to Financial Statement for the year ended 31st March'2023**

PARTICULARS					31-Mar-23	31-Mar-22
					₹	₹
<b>2. Intangible assets (under development)</b>						
<b>Project &amp; pre-operative Expenses</b>						
Travelling Expenses					3,26,242	2,17,287
Fees & Subscription					33,210	33,210
Postage & Telegram					165	165
Printing & stationary					43,519	43,519
Audit Fees					49,500	49,500
Bank Charges					7,430	7,430
Legal, Professional & Consultancy charges					16,69,357	15,70,117
Filling exps					7,500	7,500
Registration Charges with CREDA					9,90,000	9,90,000
Interest Expenses					2,21,149	1,02,938
Discharge Data Collection Exp.					1,13,100	54,300
Survey & Supervision Charges					22,43,400	22,43,400
Road Construction Work					50,000	50,000
Vehicle Hiring ,Running & Maintenance Charges					56,097	47,587
NOC & Clearance Fees					3,00,000	3,00,000
Site Expenses					20,352	9,311
Preliminary Expenses					30,500	30,500
Rent					14,000	14,000
GST Expenses					6,558	4,512
<b>TOTAL</b>					<b>61,82,079</b>	<b>57,75,276</b>
<b>Intangible assets under development</b>						
<b>Ageing Schedule for Intangible assets under development</b>						
Intangible assets under deveopment	Amount in CWIP for a period of					
	Less than 1 year	1-2 Years	2-3 Years	More than 3 years		
2022-23	₹	₹	₹	₹		
Projects in progress						
24.90 M.W. Kotaiveera SHP	4,06,803	17,01,200	2,55,070	34,48,812	58,11,885	
9.00 M.W. Ganeshpur SHP				3,70,194	3,70,194	
<b>Total</b>	<b>4,06,803</b>	<b>17,01,200</b>	<b>2,55,070</b>	<b>38,19,006</b>		
Projects temporarily suspended						
2021-22						
Projects in progress	-	-	-	-		
24.90 M.W. Kotaiveera SHP	17,01,200	2,55,070	2,72,131	31,76,681		54,05,082
9.00 M.W. Ganeshpur SHP	-	-	-	3,70,194		3,70,194
<b>Total</b>	<b>17,01,200</b>	<b>2,55,070</b>	<b>2,72,131</b>	<b>35,46,875</b>		
Projects temporarily suspended	-	-	-	-		
<b>TOTAL</b>					<b>61,82,079</b>	<b>57,75,276</b>
<b>3. Long term loans and advance</b>						
Advance for Forest land to Govt.					1,30,313	1,30,313
<b>TOTAL</b>					<b>1,30,313</b>	<b>1,30,313</b>
<b>4. Bank ,cash and cash equivalents</b>						
Balance with Scheduled Bank In Current Account					1,24,356	5,09,851
Cash-In-hand					50,082	36,862
<b>TOTAL</b>					<b>1,74,438</b>	<b>5,46,713</b>
<b>5. Current Tax Assets (Net)</b>						
TDS Receivable FY 2021-22					-	7,397
<b>TOTAL</b>					<b>-</b>	<b>7,397</b>
<b>6. Other Current Assets</b>						
Security Deposits					-	-
Bank deposits with more than 12 months maturity					-	-
Advance to Other					-	-
<b>TOTAL</b>					<b>-</b>	<b>-</b>

**SARDA HYDRO POWER LLP****Notes to Financial Statements for the year ended 31st March, 2023****NOTE 7 : Capital Contribution**

<b>PARTICULARS</b>	<b>PROFIT SHARING RATIO %</b>	<b>AS AT 01.04.2022</b>	<b>ADDITION</b>	<b>WITHDRAWALS</b>	<b>PROFIT/(LOSS) DISTRIBUTED</b>	<b>AS AT 31.03.2023</b>
Sarda Energy & Minerals Ltd.	60%	3049200	0	0	0	3049200
Prachi Agriculture & Properties Ltd.	15%	762300	0	0	0	762300
Sarda Agriculture & Properties Limited	15%	762300	0	0	0	762300
Shri Kamal Kishore Sarda	10%	508200	0	0	0	508200
<b>TOTAL</b>	<b>100%</b>	<b>5082000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5082000</b>

### Statement of Changes in Equity for the Financial Year 31st March 2023

At 31st March 2023

At 31st March 2023

Particulars	Share application money pending allotment	Equity component of Compound financial instruments	Reserves and Surplus										Money received against share warrants	Total
			Capital Reserve	Securities Premium	Other Reserves	Retained Earning	Debt Instruments through Other Comprehensive Income	Equity Instruments through Other Comprehensive Income	Effective portion of Cash Flow Hedges	Revaluation Surplus	Exchange Differences on translating the financial statements of a foreign operation	Other Items of Other Comprehensive Income		
Balance at the beginning of the current reporting period						(2,60,009)								(2,60,009)
Changes in accounting policy or prior period errors														-
Restated balance at the beginning of the current reporting period														-
Total Comprehensive Income for the current year														-
Dividend														-
Transfer to retained earnings						(48,054)								(48,054)
Any other change														-
Balance at the beginning of the current reporting period				-		(3,08,063)						-		(3,08,063)

At 31st March 2022

[illegible]

**SARDA HYDRO POWER LLP****Notes to Financial Statement for the year ended 31st March 2023**

PARTICULARS	31-Mar-23	31-Mar-22
	₹	₹
<b><u>9. Borrowings:</u></b>		
Unsecured Loan from holding company	16,82,532	15,76,142
<b>Total</b>	<b>16,82,532</b>	<b>15,76,142</b>
<b><u>10. Other Current Liabilities</u></b>		
Legal & Professional Fees Payable		
Rent Payable	3,000	-
TDS Payable	11,821	42,960
GST Payable	540	3,606
Other Payable	-	-
Audit Fees Payable	15,000	15,000
<b>TOTAL</b>	<b>30,361</b>	<b>61,566</b>
<b><u>11. Other Income</u></b>		
Other Income	4,06,803	17,01,200
	<b>4,06,803</b>	<b>17,01,200</b>
<b><u>12. Finance Costs</u></b>		
Interest Expenses	1,18,211	10,629
Bank Charges	10,563	4,231
<b>TOTAL</b>	<b>1,28,774</b>	<b>14,860</b>
<b><u>13. Operating and Other Expenses</u></b>		
Survey & Supervision Charges	-	6,34,197
Discharge Data Collection Exp.	58,800	54,300
Site Expenses	11,041	3,610
Travelling Expenses to Others	1,08,955	1,27,983
Vehicle Hiring Charges for Site	8,510	21,124
Legal & Consultancy Fees	1,05,140	8,50,745
Printing & Stationery	2,424	1,550
Office Rent	12,000	12,000
Audit Fees	15,000	15,000
Filling Fees	1,200	-
Fees & Subscription	-	12,200
Sundry Balance Write off	967	
GST Expenses	2,046	4,512
<b>TOTAL</b>	<b>3,26,083</b>	<b>17,37,221</b>
<b><u>14. Contingent Liability not provided for</u></b>		
Demand against the LLP not acknowledged as debts		
Income Tax	<b>2,58,633</b>	<b>2,58,633</b>
During the FY 2014-15, search & survey operation was conducted in the premises of the Sarda Hydro Power Private Limited u/s 132 & 133A of the Income Tax Act 1961. The Company has been converted to Sarda Hydro Power LLP on dated 05.03.2019. After completion of assessment, Assessing Officer raised demand of Rs. 258633/- related to FY 2014-15, However the Company has contested the demand by filing an appeal to CIT(Appeal). The Management doesn't foresee any liability at this stage.		