

**Form No. 3CEAA**

**[See rule 10DA]**

**MASTER FILE**

**Report to be furnished under sub-section (4) of section 92D of the Income Tax Act, 1961**

**PART – A**

1.	Name of the assessee	:	Viney Corporation Private Limited	
2.	Address of the assessee	:	E-872, First Floor, Saraswati Vihar, Pitampura, New Delhi 110034	
3a.	Permanent account number of the assessee	:	AAACV0446L	
3b.	Assessment Year	:	2021-22	
4.	Name of the international group of which the assessee is a constituent entity	:	Viney Corporation	
5.	Address of the international group of which the assessee is a constituent entity	:	E-872, First Floor, Saraswati Vihar, Pitampura, New Delhi 110034	
6.	Accounting Year for which the report is being submitted	:	01-04-2020 to 31-03-2021	
7.	Number of constituent entities of the international group operating in India	:	1	
8.	Name, permanent account number and address of all the constituent entities included in item No. 7.	:		
	<b>Serial Number</b>		<b>Name of the constituent entities of the international group</b>	<b>Permanent account number of the constituent entities of the international group</b>
	1		Viney Corporation Private Limited	AAACV0446L
				E-872, First Floor, Saraswati Vihar, Pitampura, New Delhi 110034

## **Part B**

### **Organisational Structure**

#### **Clause 1: List of all entities of the international group along with their addresses**

Attached as Excel File – *Constituent entities list*.

#### **Clause 2: Chart depicting the legal status of the constituent entity and ownership structure of the entire international group (*Upload as an attachment*)**

Attached as PDF File – *Viney Corporation Group Chart*.

### **Description of MNE Business**

#### **Clause 3: Written description of the business of the international group during the accounting year in accordance with clause (c) of sub-rule (1) of rule 10DA containing the following, namely:-**

##### **Clause 3(i): the nature of the business or businesses (upto 4000 characters)**

The nature of the businesses of Viney Corporation Group is described below:

Viney Corporation Group is a premier manufacturer and supplier of auto components. Founded in 1989, the group continues to be a pioneer in mechanical, mechatronic and electronic technologies for wiring harnesses, terminals, connectors, wires and switches, supplied to leading Two-Wheeler, Passenger Vehicle, Commercial Vehicle Manufacturers and Tier 1 Customers in India and overseas.

The product portfolio of the group for Indian business consists of wiring harness, plastic parts/connectors, terminals, teflon and auto-grade wires and rubber components. In Europe, the group focuses on mechatronic/mechanical switches, plastic parts and wiring harness.

The group also has presence in the solar power industry and has commissioned a 1MW Solar power plant at Bikaner in Rajasthan in 2013. It has added another 1 MW Solar power plant at Jodhpur in Rajasthan in 2014. The power purchase agreements are entered into by the group with the state government for the sale of power. The group has also installed a 160KW solar power plant at its Manesar (Haryana) facility for captive consumption.

##### **Clause 3(ii): the important drivers of profits of such business or businesses (upto 4000 characters)**

The important drivers of profits of Viney Corporation Group are:

- a) Multi-location Manufacturing Capability:** It operates through 13 production facilities –10 plants in India, 1 plant in Italy and 2 plants in Romania. The plants in India are located within the vicinity of the various auto industry clusters across India, thus providing the locational edge to cater to the OEMs & Tier 1 customers demand in the least possible turn-around time. European plants also have the close proximity with the OEMs and operate through a blend of highly automated plant in Italy and labor-intensive plant in Romania, with low labor cost, thus propelling the profits.

- b) Backward-integration and Latest Technology:** It is fully backward-integrated with a lean organization structure, low key operations and having plants in Tax-free zones in India. It has highly sophisticated, flexible manufacturing facilities with latest, technologically advanced, imported machines and in-house design and development facilities.
- c) Logistics Management:** Effective coordination by the logistics team of the constituent entities with their production units ensures availability of auto-components in the warehouses at the right time for timely delivery and to attain customer retention and continuity.
- d) Customer satisfaction:** The group has built up a customer portfolio of leading OEMs and Tier 1 suppliers (majorly under contract with OEMs), resulting in robust exports and marking its presence in global markets.

**Clause 3(iii): a description of the supply chain for the five largest products or services of the international group in terms of revenue and any other products including services amounting to more than five per cent of the consolidated group revenue (*Upload as an attachment*)**

Attached as PDF File – *Viney Corporation Group Supply Chain -Clause 3(iii).*

**Clause 3(iv): a list and brief description of important service arrangements made among members of the international group, other than those for research and development services (*Upload as an attachment*)**

Attached as PDF File – *Viney Corporation Group Service Arrangements - Clause 3(iv).*

**Clause 3(v): a description of capabilities of the main service providers within the international group;**

**Table 1: Details on capabilities of main service providers**

S. No.	Name of service provider	Address	Nature of intra-group service	Description of capabilities
1.	Vimercati S.p.A, Italy	Via Vincenzo, Monti 38 200016 Pero, Milano, Italy	Provision of marketing support, quality control and information technology ('IT') services	<p>a) Preference of European OEM customers to deal with an Italian company vis-à-vis a Romanian company</p> <p>b) Scarcity of required personnel in Romania</p> <p>c) Availability of professional and experienced team and IT infrastructure and servers in Vimercati S.p.A.</p>

**Clause 3(vi): the transfer pricing policies for allocating service costs and determining prices to be paid for intra-group services;**

The transfer pricing policies in respect of intra-group services are provided below:

**Table 2: Transfer Pricing Policies for intra-group services**

S. No.	Service	TP Policy
1	Provision of marketing support, quality control and information technology ('IT') services	The fee charged by Vimercati S.p.A, Italy is calculated at 8% of direct sales made to third party customers by the service recipient.

**Clause 3(vii): a list and description of the major geographical markets for the products and services offered by the international group**

**Table 3: List of major geographical markets**

S. No.	Name of the Product and Service	Major Geographical Markets (for sale of each product/Service)
1	Wiring Harness	India
2	Terminals and Connectors	India
3	Visible Switches and Mechatronic Devices	Germany, China, France, Spain, UK
4	Sliding Door Switches	Italy, France, Romania, Turkey, Poland
5	Hidden Switches	France, Slovenia, Italy, Germany, Spain
6	Steering Wheel Switches	Romania, Turkey, Germany, Portugal, Brazil

**Clause 3(viii): the functions, assets and risks analysis of the constituent entities of the international group that contribute at least ten per cent. of the revenues or assets or profits of such group; and**

**Clause (viii) (a)----Whether any of the constituent entities of the international group contributes at least ten percent of revenue or assets or profits of such group? YES/NO**

YES

Attached as PDF File – *Viney Corporation Group FAR - Clause 3(viii)*.

**Clause 3(ix): a description of the important business restructuring transactions, acquisitions and divestments**

Not applicable

### **MNE Intangibles**

**Clause 4: Description of the overall strategy of the international group for the development, ownership and exploitation of intangible property, including location of principal research and development facilities and their management. (upto 4000 characters)**

For Viney Corporation Group, R&D is a very important function in the complete supply chain. It has two R&D centres in Italy and in India respectively. R&D activities for European operations are centralised and are performed by Vimercati S.p.A, Italy. It has a strong niche for design and development of new products & prototypes with in-house 3D modelling capabilities and testing lab. It consists of professionals highly qualified in Electronics and Mechatronics stream with state-of-the-art Software and Hardware for Design and Analysis. The center caters to all the present and future product development needs of the current and prospective customers.

In India also, Viney Corporation Group has established a R&D Lab in Gurugram, having state of the art facilities continuously engaged in industrial research endeavors to transcend the refined techniques employed by the automotive industry. This R&D Lab is driven by technically qualified engineers & rich experienced personnel who continuously striving for new product development, improvement in existing products, cost reductions and import substitution of Automotive Parts and Components by adopting advanced technology and designing capabilities. Hence, it is recognized and registered as a research institute by Department of Scientific & Industrial Research (DSIR), Ministry of Science & Technology, Government of India.

**Clause 5: List of all entities of the international group engaged in development of intangible property and in management of intangible property along with their addresses.**

S. No	Name of entity of the international group	Address of entity of the international group
1.	Viney Corporation Private Limited	E-872, First Floor, Saraswati Vihar, Pitampura, New Delhi 110034
2.	Vimercati S.p.A, Italy	Via Vincenzo, Monti 38 200016 Pero, Milano, Italy

**Clause 6: List of all the important intangible property or groups of intangible property owned by the international group along with the names and addresses of the group entities that legally own such intangible property**

S. No.	Intangible Property	Legal Owner of Intangible Property	Address
1	Technical know-how (Products manufactured by Vimercati S.p.A, Italy & Vimercati East Europe S.r.L., Romania)	Vimercati S.p.A, Italy	Via Vincenzo, Monti 38 200016 Pero, Milano, Italy

S. No.	Intangible Property	Legal Owner of Intangible Property	Address
2	Technical know-how (Products manufactured by Vimercati East Europe S.r.L., Romania)	Vimercati East Europe S.r.L. Romania	Strada Garii, NR 100, Hemius 607235, Bacau, Romania

**Clause 7: List and brief description of important agreements among members of the international group related to intangible property, including cost contribution arrangements, principal research service agreements and license agreements. (upto 4000 characters)**

Vimercati S.p.A, Italy has entered into a Technical know-how agreement with Vimercati East Europe S.r.L., Romania, whereby Vimercati S.p.A, provides technical know-how and engineering support to Vimercati East Europe S.r.L. in respect of development of technical know-how on project basis by technically qualified engineers and experienced personnel who continuously strive for new product design development, prototype creation, commissioning and setting up of production line, improvement in existing automotive parts and components by adopting advanced technology and designing capabilities.

**Clause 8: Description of the transfer pricing policies of the international group related to research and development and intangible property. (upto 4000 characters)**

Vimercati East Europe S.r.L, Romania makes payment to Vimercati S.p.A, Italy for technical know-how development cost and product design modification cost incurred for the first entity in five equal annual installments and considers such cost as intangible assets in its books of account.

**Clause 9: Description of important transfers of interest in intangible property, if any, among entities of the international group, including the names and addresses of the selling and buying entities and the compensation paid for such transfers**

Not Applicable

**MNE intercompany Financial Activities**

**Clause 10: Detailed description of the financing arrangements of the international group, including the names and addresses of the top ten unrelated lenders (*Upload as an attachment*)**

Not Applicable

**Clause 11: List of Group entities that provide central financing functions including their addresses of operation and of effective management**

Not Applicable

**Clause 12: Detailed description of the transfer pricing policies of the international group related to financing arrangements among group entities (upto 4000 characters).**

Not Applicable

**MNE Financial & Tax positions**

**Clause 13: A copy of the annual consolidated financial statement of the international group (*Upload as an attachment*)**

Attached as PDF File – *Viney Corporation Group Consolidated Financials – Clause 13.*

**Clause 14: A list and brief description of the existing unilateral advance pricing agreements and other tax rulings in respect of group for allocation of income among countries (upto 4000 characters)**

Not Applicable

**Verification**

I, **Brijesh Aggarwal** son/daughter/wife\* of Shri **Ved Parkash Aggarwal** hereby declare that I am furnishing the information in my capacity as **Managing Director** of **Viney Corporation Private Limited** and I am competent to furnish the said information and verify it.

***Place:*** New Delhi

*Signature\*\**

***Date:*** \_\_ February, 2022

***Address of the declarant***  
*D-631, 1st Floor, Saraswati Vihar,*  
*Pitampura, Delhi-110034*  
***PAN of the declarant***  
AALPA3343B

***Note 1:*** \*Strike off whichever is not applicable.

***\*\*This form has to be signed by the person competent to verify the return of income under section 140.***

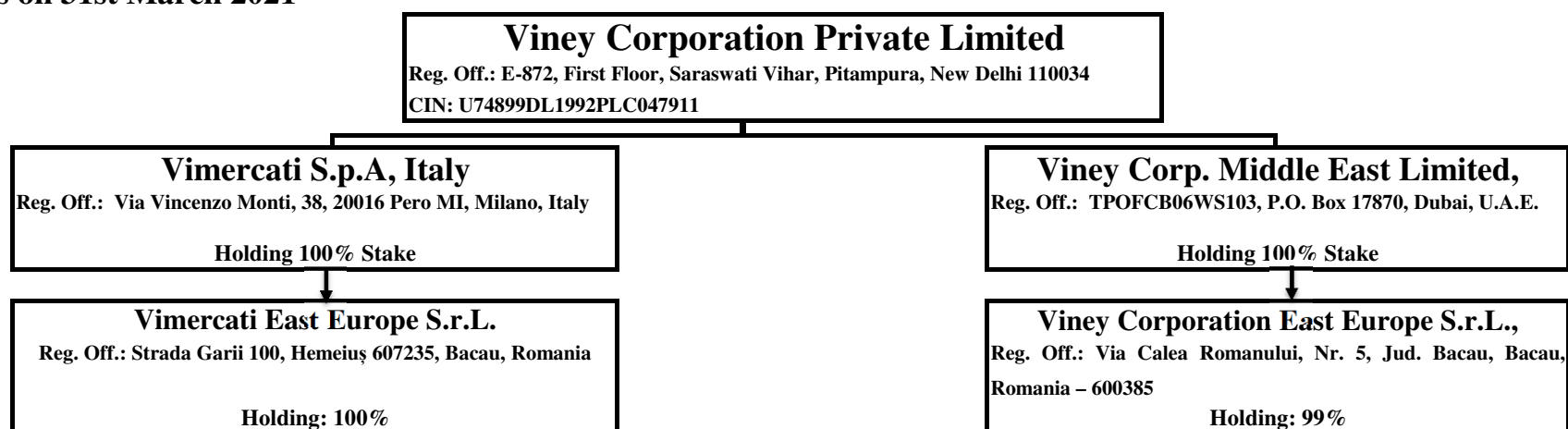
**Clause 1 - List of all entities of the international group along with their addresses**

<b>S. No.</b>	<b>Company Name</b>	<b>Address</b>
1	Viney Corporation Private Limited	E-872, First Floor, Saraswati Vihar, Pitampura, New Delhi 110034
2	Vimercati S.p.A, Italy	Via Vincenzo, Monti 38 200016 Pero, Milano, Italy
3	Viney Corporation Middle East Limited, U.A.E.	P. O. Box 17870, Dubai, UAE
4	Vimercati East Europe S.r.L., Romania	Strada Garii, NR 100, Hemius 607235, Bacau, Romania
5	Viney Corporation East Europe S.r.L., Romania	Via Calea Romanului, Nr.5,Bacau, Romania-600384



## Viney Corporation Group

### Group Chart as on 31st March 2021



*Note: The financial statements of Viney Corporation Private Limited are not consolidated on line-by-line basis in the consolidated financial statement of Synergy Metal Investments Holding Limited. Therefore, the Master File as per Rule 10DA of the Income Tax Rules, 1962 is prepared by Viney Corporation Private Limited for its international group comprising its subsidiary companies including step down subsidiary companies.*

**Clause 3(iii): a description of the supply chain for the five largest products or services of the international group in terms of revenue and any other products including services amounting to more than five per cent of the consolidated group revenue (Upload as an attachment)**

**Revenue ratio table in relation to supply chain for the five largest products or services of the international group:**

<b>Nature of Products</b>	<b>Percentage of consolidated group revenue</b>
Visible Switches and Mechatronic Devices	29%
Steering Wheel Switches	23.22%
Wiring Harness	17.39%
Hidden Switches	8.45%
Terminals and Connectors	7.94%
Sliding Door Switches	5.82%

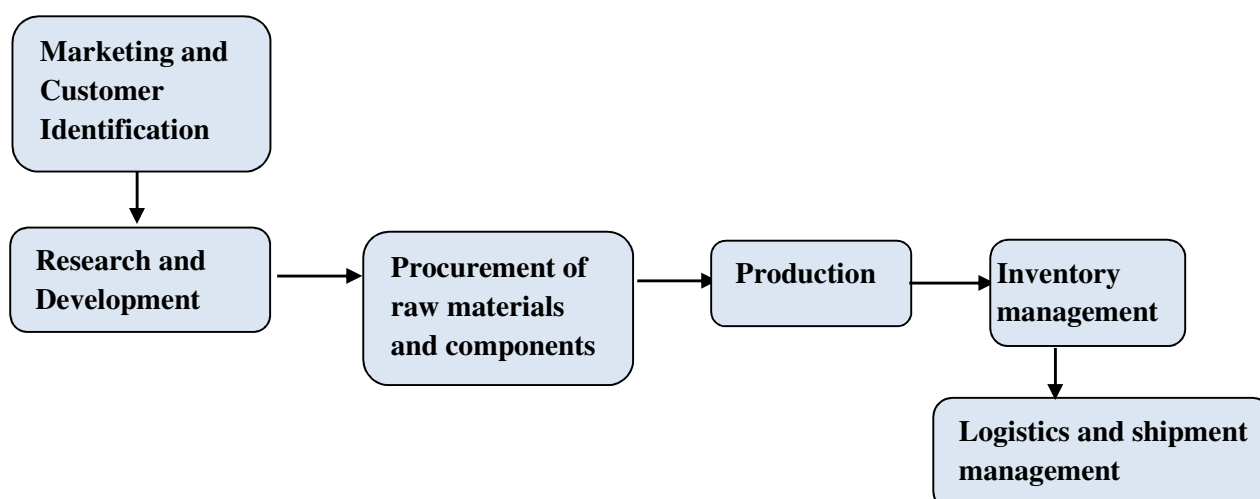
Viney Corporation Group is a multinational auto-component manufacturing conglomerate, with disintegrated value chain around manufacturing, marketing and distribution supply chain for the global automotive industry.

Viney Corporation Group is mainly engaged in manufacturing of auto components. The Group has its manufacturing entities in India, Italy and Romania viz. Viney Corporation Private Limited, Vimercati S.p.A, Italy, Vimercati East Europe S.r.L., Romania and Viney Corporation East Europe S.r.L., Romania respectively. The product portfolio of the group in India comprises wiring harness, plastic parts/connectors, terminals, teflon and auto-grade wires and rubber components. In Europe, the group focuses on mechatronic/mechanical switches, plastic parts and wiring harness.

The constituent entities of the group follow a decentralised business model with disintegrated supply chain comprising Marketing & Customer Identification, Research and Development, Procurement of Raw Materials and Components, Production, Inspection and Quality Control, Inventory Management, Logistics and Shipment Management. However, Marketing & Customer Identification and Research & Development activity for European operations is centralised and performed by Vimercati S.p.A, Italy and rest of the activities are decentralised and performed by the individual constituent entities.

**Description of the supply chain of the Group**

**A. Diagrammatic representation of the supply chain**



**B. Summary of the activities undertaken by each constituent entity of the Viney Corporation Group along the supply chain**

**1. Marketing and Customer Identification**

Each constituent entity invests significant resources in identifying new customers with customized marketing plans with strategic focus on enduring long-term relationship with its existing customers.

The marketing team of each entity undertakes extensive market research, formulates marketing strategies and engages in promotion of the auto-products to enhance the entity's sales.

The activity for Marketing & Customer identification for European operations are centralized under Vimercati S.p.A, Italy. The function is responsible for connecting customers with both Vimercati SpA Italy and Vimercati S.r.l. Romania based on the capabilities of respective plants and customers' requirements.

**2. Research & Development (R&D)**

For Viney Corporation Group, R&D is a very important function in the complete supply chain. It has two R&D centres in Italy and in India respectively. R&D activities for European operations are centralised and are performed by Vimercati S.p.A, Italy. It has a strong niche for design and development of new products & prototypes with in-house 3D modelling capabilities and testing lab. It consists of professionals highly qualified in Electronics and Mechatronics stream with state-of-the-art Software and Hardware for Design and Analysis. The centre caters to all the present and future product development needs of the current and prospective customers.

In India also, Viney Corporation Group has established a R&D Lab in Gurugram, having state of the art facilities continuously engaged in industrial research endeavors to transcend the refined techniques employed by the automotive industry. This R&D Lab is driven by technically qualified engineers & rich experienced personnel who continuously striving for new product development, improvement in existing products, cost reductions and import substitution of Automotive Parts and Components by adopting advanced technology and designing capabilities. Hence, it is recognized and registered as a research institute by Department of Scientific & Industrial Research (DSIR), Ministry of Science & Technology, Government of India.

**3. Procurement of raw materials and components**

Procurement function deals with the sourcing activities, negotiation with vendors and strategic selection of goods and services that are usually of importance to a manufacturing organization. Procurement is a value adding function and it deals not only with procurement of raw materials and components, but also with purchase of capital equipments, process of selecting vendors, establishing payment terms, strategic vetting, selection, the negotiation of contracts and actual purchasing of goods, spare parts procurement, managing rejections, defective returns, warranty replacement process with suppliers too.

As a business strategy, each of the group manufacturing entities has its own decentralized procurement team, which conducts quality checks with help of quality department for raw material and components to be procured and also enters into long-term tie ups with major suppliers to procure the required raw material and components, in order to achieve cost efficiency. This enables the group to sustain in the competitive environment.

The Supply chain team engages in the following functions:

- Identification of raw material requirement across the manufacturing plants;
- Identification of raw material suppliers and vendors (“suppliers”);
- Setting quality standards along with Quality department team for the raw materials to be procured;
- Negotiation with the suppliers;
- Selection of the suppliers and entering into contracts with the suppliers;
- Planning demand requirements across the manufacturing departments; and
- Timely delivery of the raw material requirement to the manufacturing plants.

For the manufacturing of auto components, timely and cost-effective procurement of auto-parts plays a key role in the efficient supply chain thereby playing a vital role in the strategy of the business.

#### 4. Production

The Group manufactures its auto-products across its **16** production facilities – **13** plants in India and **3** overseas in Italy (1 plant) and Romania (2 plants).

The group manufacturing entities have various teams in its production department undertaking functions starting from scheduling of production to managing outbound logistics of the manufactured auto-products. The production function begins with the production plans formulated by the **planning team**, defining the quantity of various types of auto-components to be manufactured based on the sales order and delivery schedules from customers. The **processing team** ensures the smooth conversion of the raw materials into finished products. Once the auto-components are manufactured, the quality control team undertakes extensive quality checks. During this process, the defective goods are identified and excluded from the manufactured batches. The group manufacturing entities deploy high quality testing equipment and investigative tools. Once the products qualify the quality checks, the same are packaged and labeled by the **packaging and labeling team**. The packages designed by the team ensure complete protection of the manufactured goods from any damage. The packaged goods are stored in the factory premises before being shipped to the warehouses for further distribution.

#### 5. Inventory management

The inventory management teams of group manufacturing entities oversee the movement of manufactured products from factories to the point of sale. The team undertakes numerous activities including:

- Warehousing of the packaged products,
- Stock keeping of the inventory,
- Detailed recording of new or returned stock as it enters or leaves a warehouse; and
- Outbound logistics.

Efficient inventory management plays a vital role in deciding the Group’s ability to operate with high profit margins. The inventory management teams are equipped with a modern, robust and an automated inventory management system to provide efficient solutions to inventory management.

Close interaction with production team ensures timely and cost-effective delivery of the products to its customers.

This has not only led to an optimal balance between supply and demand, but has also led to:

- Scheduled planning and forecasting;
- Gaining the competitive edge by catering customer demands in time;
- Cost efficiency by reducing excess inventory cost; and
- Better customer satisfaction.

## **6. Logistics and shipment management**

Logistics is a function that ensures orderly and timely shipment and delivery of manufactured goods. The logistics teams of group manufacturing entities coordinate and manage the flow of inventory to the customers. Local logistic teams manage last mile shipments of products from the manufacturing facilities or other requested locations. These teams are responsible for the contracts with the shipping and logistics companies and for general policies related to this function.

The inventory is managed across the warehouses maintained across various strategic locations. The teams ensure smooth and on-time outbound logistics of the stock to the OEMs and Tier 1 customers across the globe.

**Clause 3(iv): a list and brief description of important service arrangements made among members of the international group, other than those for research and development services (Upload as an attachment)**

**Table: List of Important Service Arrangements**

S. No.	Description of service arrangements	Provider of services	Recipient of services
1	Provision of marketing support, quality control and information technology ('IT') services	Vimercati S.p.A, Italy	Vimercati East Europe S.r.L., Romania

**Note: Description of Important Service Arrangements**

- **Provision of marketing support, quality control and IT services:** Vimercati S.p.A, Italy provides marketing support, quality control and IT & EDP services to Vimercati East Europe S.r.L., Romania, in particular, relating to the following categories:

**a) Marketing Support**

Marketing support services are provided by Vimercati S.p.A, Italy to Vimercati East Europe S.r.L., Romania in respect of New Customer identification, additional customer orders for existing products, information of market, customer, product, competitor, providing support for marketing strategies, providing support for participating in worldwide exhibitions and conferences, providing guidance and support in product management, providing product training etc.

**b) Quality Control Administration**

Quality control administration involves testing and maintaining of quality of products manufactured by Vimercati East Europe S.r.L., Romania in line with the quality standards set by Vimercati S.p.A, Italy as per the agreement with the customers. Additionally, quality office in Vimercati Italy provides support for setting quality standards and quality checks for inbound raw material and components for Vimercati East Europe S.r.L, Romania.

**c) IT services**

IT services are provided by Vimercati S.p.A, Italy to Vimercati East Europe S.r.L., Romania in respect of defining and documentation of group standards in business processes and application such as work flow, Master data dictionary, codification systems, setting up and maintaining IT infrastructure such as servers, WAN, hardware and software, defining, evaluating and realisation of IT applications alongside business processes, defining users, their access rights, running and maintaining unified internet security, etc.

The fee charged by Vimercati S.p.A, Italy is calculated at 8% of direct sales made to third party customers by the service recipient.

**Clause 3(viii): the functions, assets and risks analysis of the constituent entities of the international group that contribute at least ten per cent of the revenues or assets or profits of such group**

**1. Constituent entities breaching the prescribed 10% revenues/ assets/ profits threshold:**

The following constituent entities contribute to at least ten per cent of the revenues or assets or profits of the Group:

Name of the Constituent entity	Criteria (>10%)		
	Revenues	Assets	Profits
Viney Corporation Private Limited	✓	✓	✓
Vimercati S.p.A, Italy	✓	✓	x
Vimercati East Europe S.r.L, Romania	✓	✓	✓

*(This space has been intentionally left blank.)*

## 2. Functional, assets and risks (“FAR”) analysis

The functions, risks, and assets (both tangible and intangible) associated with related party operations usually have a significant effect on its profitability. Hence, the FAR analysis aims to organise the facts about the constituent entities in terms of the key functions performed, assets used, and risks assumed in order to identify how these characteristics are divided between the companies involved in the intercompany transactions. This provides a framework to determine and qualitatively assess how each entity undertakes the value-added activities in the value chain/ business model. By doing so, the FAR analysis evaluates the relative contribution to profit of various related companies and the appropriate pricing of inter-company transactions.

### 2.1 Functions performed

The following sections provide a brief functional analysis describing the principal contributions to value creation by individual entities within Viney Corporation Group (i.e. key functions performed, important risks assumed and important assets used).

Overview of the functions performed			
S. No.	Functions Performed	Function Description	Viney Corporation Group - Key Group Entity
1	Business development	<p>The business development team within Viney Corporation Group assesses customer needs, preferences and demands, and plays a key role in helping the group entities to identify new customers across various countries. Key activities include market research, strategic marketing, business development, marketing intelligence, product marketing and operative marketing.</p> <p>Once the marketing strategies are decided upon, the teams will roll-out the strategically determined advertising campaigns, effectively customized to target the customer base in their respective local country.</p> <p>The Marketing &amp; Customer identification function for European operations are centralized under Vimercati S.p.A, Italy. This function is responsible for connecting customers with both Vimercati SpA Italy and Vimercati S.r.l. Romania based on the capabilities of respective plants and customers’ requirements.</p>	<p>(a) Viney Corporation Private Limited, India</p> <p>(b) Vimercati S.p.A, Italy</p> <p>(c) Viney Corporation East Europe S.r.L., Romania</p>



Overview of the functions performed			
S. No.	Functions Performed	Function Description	Viney Corporation Group - Key Group Entity
2	<b>Research &amp; Development (R&amp;D)</b>	<p>For Viney Corporation Group, R&amp;D is a very important function in the complete value chain. It has two R&amp;D centres in Italy and in India respectively. R&amp;D activities for European operations are centralised and are performed by Vimercati S.p.A, Italy. It has a strong niche for design and development of new products &amp; prototypes with in-house 3D modelling capabilities and testing lab. It consists of professionals highly qualified in Electronics and Mechatronics stream with state-of-the-art Software and Hardware for Design and Analysis. The centre caters to all the present and future product development needs of the current and prospective customers.</p> <p>In India also, Viney Corporation Group has established a R&amp;D Lab in Gurugram, having state of the art facilities continuously engaged in industrial research endeavors to transcend the refined techniques employed by the automotive industry. This R&amp;D Lab is driven by technically qualified engineers &amp; rich experienced personnel who continuously striving for new product development, improvement in existing products, cost reductions and import substitution of Automotive Parts and Components by adopting advanced technology and designing capabilities. Hence, it is recognized and registered as a research institute by Department of Scientific &amp; Industrial Research (DSIR), Ministry of Science &amp; Technology, Government of India.</p>	<p>(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy</p>
3	<b>Scheduling of production and deliveries</b>	On the basis of the orders received from the customers, Viney corporation group prepares production and delivery execution plan which in turn facilitates timely production and scheduling of deliveries.	<p>(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania</p>
4	<b>Raw material procurement</b>	As Viney Corporation Group is primarily engaged in manufacturing of auto components, this function holds utmost importance. Each of the group manufacturing entities has its own decentralized procurement team, which conducts quality checks for raw material to be	<p>(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe</p>

Overview of the functions performed			
S. No.	Functions Performed	Function Description	Viney Corporation Group - Key Group Entity
		procured and also enters into long-term tie ups with major suppliers to procure the required raw material, in order to achieve cost efficiency. The procurement team is engaged in raw material identification, supplier identification, contract negotiations, procurement scheduling, inventory management and logistical handling of raw material from the vendors.	S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania
5	Production	<p>The manufacturing entities of Viney Corporation Group are responsible for all aspects of the manufacturing process, including on-time and high-quality production of goods ordered by the customers and other group entities.</p> <p>These functions include:</p> <ul style="list-style-type: none"> <li>• <b>Forecasting:</b> Production forecasting to determine the volume and product mix to be produced on a weekly basis.</li> <li>• <b>Processing:</b> Conversion of raw material into finished products.</li> <li>• <b>Quality Control:</b> The group manufacturer entities are responsible for maintaining quality control standards in their plants and monitoring quality results.</li> <li>• <b>Logistics and warehousing:</b> Inbound logistics activities related to the storage of materials, components, semi- manufactured goods, including inventory management &amp; inventory control. The group manufacturing entities are responsible for warehousing of raw materials, components and semi-manufactured goods. Manufacturers also facilitate the transportation of finished goods to warehousing facilities.</li> </ul>	(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania
6	Inventory management / Logistics	The Group's inventory management team is engaged in performing logistical functions in relation to transferring manufactured products to the point of sale. This involves warehousing activities, stock keeping, inbound and outbound logistics, co-ordination and management of the flow of inventory to the customer, etc. It is also responsible for negotiating and closing contracts with shipping companies involved in this chain and upholding quality standards and statutory compliances pertaining to this function.	(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania

Overview of the functions performed			
S. No.	Functions Performed	Function Description	Viney Corporation Group - Key Group Entity
7	<b>General Administration</b>	The group entities of Viney Corporation Group are responsible for performing day-to-day general administration activities on a decentralized basis.	(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania
7	<b>Internal Group Finance</b>	Each group entity assesses its own financing requirements and undertakes its own financing activities for borrowing loans from banks and financial institutions.  Viney Corporation Private Limited, being a parent entity of the international group, has invested (directly/ indirectly) in the share capital of the subsidiary companies including step down subsidiary companies. Further, it lends funds to certain group entities, whenever needed. It may also give corporate guarantee on behalf of some of its group entities with respect to the loans taken or to be taken by those entities from banks and financial institutions.	(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania

## 2.2 Assets used

Overview of Assets used			
S. No.	Assets	Description	Group Entity
1	<b>Tangible assets</b>	Viney Corporation Group's key tangible assets include manufacturing, distribution, warehousing, and administrative office facilities, and their associated equipment and physical assets.	Following entities own relevant tangible assets as required for performing their respective functions: (a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania

Overview of Assets used			
S. No.	Assets	Description	Group Entity
2	Intangibles	Viney Corporation Group's intangibles include intellectual property rights, latest technology, customer list, suppliers and customer relationships.	Following entities own relevant intangibles as required for performing their respective functions: (a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania

### 2.3 Risk assumed

Viney Corporation Group faces significant risks as an auto component group. The following table provides an overview of the significant risks borne by Viney Corporation group entities with respect to the functions undertaken during the year:

Overview of Risks Assumed			
S. No.	Risk	Risk Description	Group Entities
1	Product Liability Risk	<p>Risks associated with product failures including non-performance to generally accepted or regulatory standards. This could result in product recalls and possible injuries to end-users.</p> <p>Viney Corporation group entities are exposed to product liability risks, which could require product redesigns, product recalls or other corrective actions. This risk is mitigated by product liability insurance taken by certain constituent entities. For product recall risk, Vimercati S.p.A. has availed a combined product recall insurance for Vimercati S.p.A. and Vimercati East Europe S.r.L.</p>	<p>(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Viney Corporation East Europe S.r.L., Romania</p>

Overview of Risks Assumed			
S. No.	Risk	Risk Description	Group Entities
2	Market Risk	<p>The market risk comprises the risk caused by a shortfall in demand for the products and services offered by the Company, which could lead either to a loss of market shares or a decrease in the Company's profit margin. In this regard, it is distinguished between short-term effects resulting in a certain level of market volatility as well as long-term effects requiring an adjustment of the market strategy including, e.g., product types and features as well as the scope of services.</p> <p>The group entities of Viney Corporation Group are exposed to market risk as any increase or decrease in demand of the product manufactured by group entities would affect their sales. Accordingly, group entities indirectly bear this risk.</p>	(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania
3	Credit Risk	<p>This is the risk arising from default in payment of receivables by customers.</p> <p>The group entities of Viney Corporation Group are exposed to risk as they deal with customers located across the globe and the risk of defaulting of payments or pricing negotiation pressure by such customers could put downward price pressures on the group's revenues. These risks could result in unanticipated financial effects.</p>	(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania
4	Foreign Exchange Risk	<p>The foreign exchange risk becomes relevant if the sourcing of, e.g., materials, resources and services or if sales is performed in a currency different from the group entity's functional currency. The risk could be mitigated by hedging.</p>	(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe S.r.L., Romania (d) Viney Corporation East Europe S.r.L., Romania
5	Inventory Risk	<p>The inventory risks comprise the risk that stocks are damaged while being stored (e.g. physically destroyed or due to an incorrect storage of the goods) or that they become obsolete due to a lack of demand for the specific product in the market. The latter could result, e.g., from the launch of a new product generation with better product</p>	(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy (c) Vimercati East Europe

Overview of Risks Assumed			
S. No.	Risk	Risk Description	Group Entities
		<p>features or product substitutes. The existing damaged or obsolete stock can either be scraped or sold at a price below its book value.</p> <p>Inventory that becomes obsolete or does not meet anticipated demand may negatively affect the group entity's financial condition and operating results.</p>	<p>S.r.L., Romania</p> <p>(d) Viney Corporation East Europe S.r.L., Romania</p>
6	Legal & Regulatory Risks	<p>Risks could include intellectual property litigation, antitrust matters, product regulations and other legal matters that could prove disruptive to operations.</p> <p>The group entities of Viney Corporation Group are subject to regulatory compliance, legal compliance, and litigation matters. These risks could result in unanticipated financial effects.</p>	<p>(a) Viney Corporation Private Limited, India</p> <p>(b) Vimercati S.p.A, Italy</p> <p>(c) Vimercati East Europe S.r.L., Romania</p> <p>(d) Viney Corporation East Europe S.r.L., Romania</p>

**Note:** Viney Corporation Middle East Limited, U.A.E. is an investment holding company and does not perform significant functions except investment management, does not own significant assets except its investment in Viney Corporation East Europe S.r.L., Romania and does not bear any risk except investment related financial risk.

Particulars	Note No.	As at 31 March 2021	As at 31 March 2020
<b>Assets</b>			
<b>Non-current assets</b>			
Property, plant and equipment	4	2,250.5	2,040.1
Right of use assets	4A	203.8	256.1
Capital work in progress	4B	113.1	71.5
Goodwill	5	1,607.4	338.3
Other intangible assets	5	326.1	378.9
Intangible assets under development	5A	158.9	-
<b>Financial assets:</b>			
Investment in associate	6A	173.0	-
Investment in equity instruments	6A	128.1	42.1
Loans	7	7.8	7.4
Other financial assets	8	1.4	15.2
Non current tax assets (net)	9	129.6	116.9
Other non current assets	10	7.5	14.7
		<b>5,107.2</b>	<b>3,281.2</b>
<b>Current assets</b>			
Inventories	11	2,527.7	2,217.8
<b>Financial assets</b>			
Trade receivables	12	2,037.6	2,195.4
Cash and cash equivalents	13	1,096.6	1,108.1
Other bank balances	14	222.7	10.1
Loans	7	5.5	7.1
Other financial assets	8	88.2	55.1
Other current assets	10	181.1	134.7
		<b>6,159.4</b>	<b>5,728.3</b>
<b>Total assets</b>		<b>11,266.6</b>	<b>9,009.5</b>
<b>Equity and liabilities</b>			
<b>Equity</b>			
Equity share capital	15	184.0	200.6
Other equity	16	4,250.0	4,668.6
		<b>4,434.0</b>	<b>4,869.2</b>
<b>Liabilities</b>			
<b>Non-current liabilities</b>			
<b>Financial liabilities</b>			
Borrowings	17	2,582.4	1,001.8
Lease liabilities	4A	85.6	84.0
Provisions	18	19.8	36.0
Deferred tax liabilities (net)	19	280.9	228.6
		<b>2,968.7</b>	<b>1,350.4</b>
<b>Current liabilities</b>			
<b>Financial liabilities</b>			
Borrowings	17	1,024.6	682.9
Trade payables	20	-	-
Total outstanding dues of micro enterprises and small enterprises		9.4	14.8
Total outstanding dues of creditors other than micro enterprises and small enterprises		1,957.4	1,365.8
Lease liabilities	4A	35.6	63.5
Other financial liabilities	21	572.2	450.1
Other current liabilities	22	126.4	80.1
Provisions	18	136.0	132.2
Current tax liabilities (net)	23	2.3	0.5
		<b>3,863.9</b>	<b>2,789.9</b>
<b>Total equity and liabilities</b>		<b>11,266.6</b>	<b>9,009.5</b>

**Significant accounting policies**

The notes referred to above form an integral part of these consolidated financial statements.

As per our report of even date attached

For BSR & Co. LLP

Chartered Accountants

ICAI Firm Registration No.: 101248W/W-100022

*Ankush Goel*

Ankush Goel

Partner

Membership No.: 505121

Place: New Delhi

Date: 03 November 2021



For and on behalf of the Board of Directors of

Viney Corporation Private Limited

(Formerly known as "Viney Corporation Limited")

*Brijesh Aggarwal*

Brijesh Aggarwal

Managing Director

DIN: 00511293

Place: New Delhi

Date: 03 November 2021

*Sunil Gupta*

Sunil Gupta

Company Secretary

Membership No. 34697

Place: New Delhi

Date: 03 November 2021

*Rakesh Kumar Aggarwal*

Rakesh Kumar Aggarwal

Whole Time Director

DIN: 00248752

Place: New Delhi

Date: 03 November 2021

*Arun Kumar Malik*

Arun Kumar Malik

Group CFO

Place: New Delhi

Date: 03 November 2021

Viney Corporation Private Limited  
(Formerly known as "Viney Corporation Limited")  
Consolidated Statement of Profit and Loss for the period ended 31 March 2021  
CIN:- U74899DL1992PTC047911  
(All amounts are in Rupees million, unless otherwise stated)

Particulars	Note No.	Year ended 31 March 2021	Year ended 31 March 2020
<b>Income</b>			
Revenue from operations	24	9,075.5	11,679.1
Other income	25	135.2	52.6
<b>Total income</b>		<b>9,210.7</b>	<b>11,731.7</b>
<b>Expenses</b>			
Cost of materials consumed	26A	4,742.9	5,897.7
Purchases of stock in trade	26B	26.5	82.8
Changes in inventories of work-in-progress and finished goods	27	(51.8)	79.4
Employee benefits expense	28	1,568.1	1,905.1
Finance costs	29	163.8	86.9
Depreciation and amortisation/ impairment expense	30	668.6	744.6
Other expenses	31	1,421.9	1,806.5
<b>Total expenses</b>		<b>8,540.0</b>	<b>10,603.0</b>
<b>Profit before tax</b>		<b>670.7</b>	<b>1,128.7</b>
<b>Tax expense:</b>			
- Current tax expense	19	345.4	269.1
- Tax adjustment relating to earlier years		(14.2)	-
- Deferred tax charge	19	52.2	168.3
<b>Tax expense</b>		<b>383.4</b>	<b>437.4</b>
<b>Profit before share of profit/(loss) of associates and after tax</b>		<b>287.3</b>	<b>691.3</b>
Share of profit of associates		1.2	-
<b>Total profit after share of profit of associates</b>		<b>288.5</b>	<b>691.3</b>
<b>Other comprehensive income (OCI)</b>			
<b>Items that will not be reclassified to profit or loss</b>			
Re-measurement gain/(losses) on defined benefit obligations/assets	19	3.5	(0.5)
Income tax effect		(1.0)	0.1
<b>Items that will be reclassified subsequently to profit or loss</b>			
Foreign currency translation reserve		(9.8)	160.9
<b>Other comprehensive income for the year (net of tax)</b>		<b>(7.3)</b>	<b>160.5</b>
<b>Total comprehensive income for the year</b>		<b>281.2</b>	<b>851.8</b>
Basic and diluted earnings per equity share (nominal value of share Rs 10 each)	16B	14.94	33.61
Significant accounting policies	3		
The notes referred to above form an integral part of these consolidated financial statements.			
As per our report of even date attached			

For BSR & Co. LLP  
Chartered Accountants  
ICAI Firm Registration No.: 101248W/W-100022

*Ankush Goel*  
Ankush Goel  
Partner  
Membership No.: 505121

Place: New Delhi  
Date: 03 November 2021



For and on behalf of the Board of Directors of  
Viney Corporation Private Limited  
(Formerly known as "Viney Corporation Limited")

*Brijesh Aggarwal*  
Brijesh Aggarwal  
Managing Director  
DIN: 00511293

Place: New Delhi  
Date: 03 November 2021

*Sunil Gupta*  
Sunil Gupta  
Company Secretary  
Membership No. 34697

Place: New Delhi  
Date: 03 November 2021

*Rakesh Kumar Aggarwal*  
Rakesh Kumar Aggarwal  
Whole Time Director  
DIN: 00248752

Place: New Delhi  
Date: 03 November 2021

*Arun Kumar Malik*  
Arun Kumar Malik  
Group CFO

Place: New Delhi  
Date: 03 November 2021



Viney Corporation Private Limited  
(Formerly known as "Viney Corporation Limited")  
Consolidated Cash flow statement for the year ended 31 March 2021  
CIN:- U74899DL1992PTC047911  
(All amounts are in Rupees million, unless otherwise stated)

Particulars	Year ended 31 March 2021	Year ended 31 March 2020
<b>A. Cash flow from operating activities</b>		
Profit for the year before tax and after adjustment relating to foreign currency translation reserve and other comprehensive income	664.6	1,289.2
<b>Adjustments for:</b>		
Depreciation and amortisation/impairment expense	668.6	744.6
Net fair value (Profit) / loss on financial assets mandatorily measured at fair value through profit or loss	(86.1)	3.3
Provision for loss allowance	21.3	32.7
Provision created for recoverable from vendor (also refer note 35A)	3.1	3.1
(Profit) / loss on sale of property, plant and equipment	(0.2)	(1.0)
Finance costs	163.8	86.9
Provision for diminution in the value of inventory	(3.5)	4.8
<b>Interest on</b>		
Fixed deposits	(15.5)	(8.7)
Others*	(0.1)	-
<b>Operating profit before changes in assets and liabilities</b>	<b>1,416.0</b>	<b>2,154.9</b>
<b>Adjustments for changes in assets and liabilities</b>		
(increase)/Decrease in inventories	(276.9)	38.8
Decrease / (increase) in trade receivables	197.4	59.3
Decrease/(increase) in loans, other financial assets and other current assets	1.2	(36.8)
Increase in trade payables	554.3	(44.3)
(Decrease) in other current liabilities, lease liabilities, other financial liabilities and provisions	(46.1)	15.5
<b>Cash generated from operations</b>	<b>1,845.9</b>	<b>2,187.4</b>
Income tax paid	(356.1)	(321.4)
<b>Net cash generated from operating activities</b>	<b>1,489.8</b>	<b>1,866.0</b>
<b>B. Cash flow from investing activities</b>		
Purchase of property, plant and equipment	(870.8)	(603.2)
Proceeds from capital advance received back	-	50.0
Proceeds from sale of property, plant and equipment	15.0	3.8
Increase / (decrease) in deposits having original maturity of more than 3 months	(198.8)	249.4
Purchase of undertaking during the year (refer note 39B)	(1,452.0)	-
Interest received	15.6	20.7
Purchase of investment	(171.8)	-
<b>Net cash used in investing activities</b>	<b>(2,662.8)</b>	<b>(279.3)</b>
<b>C. Cash flows from financing activities</b>		
Proceeds from long-term borrowings	1,989.6	5.6
Repayments of long-term borrowings	(306.7)	280.2
Repayments of short-term borrowings (net)	301.7	(69.4)
Payment of lease liabilities (principal and interest)	24.0	(87.6)
Payments on buy back of equity shares	(551.9)	(714.8)
Tax on buyback of equity share	(131.4)	(161.0)
Finance cost paid	(163.8)	(83.3)
Dividend paid	-	(32.1)
Dividend distribution tax paid	-	(6.6)
<b>Net cash used in financing activities</b>	<b>1,161.5</b>	<b>(869.0)</b>
<b>Net increase / (decrease) in cash and cash equivalents (A+B+C)</b>	<b>(11.5)</b>	<b>717.7</b>
<b>Cash and cash equivalents at the beginning of the year</b>	<b>1,108.1</b>	<b>390.4</b>
<b>Cash and cash equivalents at the end of the year</b>	<b>1,096.6</b>	<b>1,108.1</b>



Viney Corporation Private Limited  
(Formerly known as "Viney Corporation Limited")  
Consolidated Cash flow statement for the year ended 31 March 2021  
CIN:- U74899DL1992PTC047911  
(All amounts are in Rupees million, unless otherwise stated)

**Notes to cash flow statement:**

The cash flow statement has been prepared under the indirect method set out in Indian Accounting Standard 7 on Statement of Cash flows as notified under Section 133 of the Companies Act, 2013.

\*Amount below rounding off norms.

As per our report of even date attached

**For BSR & Co. LLP**  
Chartered Accountants  
ICAI Firm Registration No.: 101248W/W-100022

*Ankush Goel*

**Ankush Goel**  
Partner  
Membership No.: 505121



Place: New Delhi  
Date: 03 November 2021

For and on behalf of the Board of Directors of  
**Viney Corporation Private Limited**  
(Formerly known as "Viney Corporation Limited")

*Brijesh Aggarwal*

**Brijesh Aggarwal**  
Managing Director  
DIN: 00511293

Place: New Delhi  
Date: 03 November 2021

*Sunil Gupta*

**Sunil Gupta**  
Company Secretary  
Membership No. 34697

Place: New Delhi  
Date: 03 November 2021



*Rakesh Kumar Aggarwal*

**Rakesh Kumar Aggarwal**  
Whole Time Director  
DIN: 00248752

Place: New Delhi  
Date: 03 November 2021

*Arun Kumar Malik*  
**Arun Kumar Malik**  
Group CFO

Place: New Delhi  
Date: 03 November 2021

### Master File of Viney Corporation Group

The Master File of **Viney Corporation Group** (*Viney Corporation Group along with its associated entities hereinafter referred to as “the Group”*) as applicable for Financial Year 2020-21 has been enclosed. The five constituent entities of the Group, namely:

1. Viney Corporation Private Limited, India
2. Vimercati S.p.A, Italy
3. Viney Corporation Middle East Limited, U.A.E.
4. Vimercati East Europe S.r.L., Romania
5. Viney Corporation East Europe S.r.L., Romania

**Viney Corporation Private Limited**, being the ultimate parent entity has been designated as the constituent entity required to file the Master File in India.

It is pertinent to note that the attached Master File reflects only a broad overview of the Group. Specific functions performed by each constituent entity has been elaborated in the local file / TP documentation of such entity.

The specific requirements of the Master File as listed in Rule 10DA of the Income Tax Rules, 1962 and OECD Transfer Pricing Guidelines (TPG) 2022 respectively and its references to India Master File (Part B of Form 3CEAA) have been tabulated below:

Information requirement as per Rule 10DA ( <i>refer additional requirements as underlined</i> )	OECD TPG 2022 – Paras 5.18 and 5.19 ( <i>Page No. 231 and 232</i> ) read with Annex I to Chapter V ( <i>Page No. 543-544</i> )	Reference in Part B of Form 3CEAA ( <i>India Master File</i> )
<b>Organizational Structure</b>	<b>Organizational Structure</b>	
<u>A list of all entities of the international group along with their addresses</u>	Chart illustrating the MNE group’s legal and ownership structure and geographical location of operating entities.	Clause 1 and Excel File – Constituent entities list
A chart depicting the legal status of the constituent entity and ownership structure of the entire international group		Clause 2 and PDF File – <i>Viney Corporation Group Chart</i>
<b>Description of the international group’s business</b>	<b>Description of MNE group’s business(es)</b>	
<u>The nature of the business or businesses (General written description of the international group’s business)</u>	General written description of the MNE group’s business including:	Clause 3 (i)
The important drivers of profits of such business or businesses	Important drivers of business profit;	Clause 3 (ii)

Information requirement as per Rule 10DA ( <i>refer additional requirements as underlined</i> )	OECD TPG 2022 – Paras 5.18 and 5.19 ( <i>Page No. 231 and 232</i> ) read with Annex I to Chapter V ( <i>Page No. 543-544</i> )	Reference in Part B of Form 3CEAA ( <i>India Master File</i> )
A description of the supply chain for the five largest products or services of the international group in terms of revenue and any other products including services amounting to more than five per cent of consolidated group revenue	A description of the supply chain for the group's five largest products and/or service offerings by turnover plus any other products and/or services amounting to more than 5% of group turnover. The required description could take the form of a chart or a diagram	Clause 3 (iii) and PDF File – <i>Viney Corporation Group Supply Chain - Clause 3(iii)</i>
A list and brief description of important service arrangements made among members of the international group, other than those for research and development services	A list and brief description of important service arrangements between members of the MNE group, other than research and development (R&D) services, including a description of the capabilities of the principal locations providing important services and transfer pricing policies for allocating services costs and determining prices to be paid for intra-group services	Clause 3 (iv) and PDF File – <i>Viney Corporation Group Service Arrangements - Clause 3(iv)</i>
A description of the capabilities of the main service providers within the international group		Clause 3 (v)
Details about the transfer pricing policies for allocating service costs and determining prices to be paid for intra-group services		Clause 3 (vi)
A list and description of the major geographical markets for the products and services offered by the international group	A description of the main geographic markets for the group's products and services that are referred to in the second bullet point above	Clause 3 (vii)
A description of the functions performed, assets employed and risks assumed by the constituent entities of the international group that contribute <u>at least ten per cent of the revenues or assets or profits of such group</u>	A brief written functional analysis describing the principal contributions to value creation by individual entities within the group, i.e. key functions performed, important risks assumed, and important assets used	Clause 3 (viii) and PDF File – <i>Viney Corporation Group FAR - Clause 3(viii)</i>
A description of the important business restructuring transactions, acquisitions and divestments	A description of important business restructuring transactions, acquisitions and divestitures occurring during the fiscal year.	Clause 3 (ix) [ <i>Not applicable</i> ]
<b>International group's intangibles</b>	<b>MNE group's intangibles (as defined in Chapter VI of these Guidelines)</b>	
A description of the overall strategy of the international group for the development, ownership and exploitation of intangible property, including location of principal research and development facilities and their management	A general description of the MNE group's overall strategy for the development, ownership and exploitation of intangibles, including location of principal R&D facilities and location of R&D management.	Clause 4
<u>A list of all entities of the international group engaged in development and management of intangible property along with their addresses</u>		Clause 5

Information requirement as per Rule 10DA ( <i>refer additional requirements as underlined</i> )	OECD TPG 2022 – Paras 5.18 and 5.19 ( <i>Page No. 231 and 232</i> ) read with Annex I to Chapter V ( <i>Page No. 543-544</i> )	Reference in Part B of Form 3CEAA ( <i>India Master File</i> )
A list of all the important intangible property or groups of intangible property owned by the international group along with the names and addresses of the group entities that legally own such intangible property	A list of intangibles or groups of intangibles of the MNE group that are important for transfer pricing purposes and which entities legally own them.	Clause 6
A list and brief description of important agreements among members of the international group related to intangible property, including cost contribution arrangements, principal research service agreements and license agreements	A list of important agreements among identified associated enterprises related to intangibles, including cost contribution arrangements, principal research service agreements and licence agreements.	Clause 7
A detailed description of the transfer pricing policies of the international group related to research and development and intangible property	A general description of the group's transfer pricing policies related to R&D and intangibles.	Clause 8
A description of important transfers of interest in intangible property, if any, among entities of the international group, including the name and address of the selling and buying entities and the compensation paid for such transfers	A general description of any important transfers of interests in intangibles among associated enterprises during the fiscal year concerned, including the entities, jurisdictions, and compensation involved.	Clause 9 <i>[Not applicable]</i>
<b>International group's intercompany financial activities</b>	<b>MNE group's intercompany financial activities</b>	
A detailed description of the financing arrangements of the international group, including the names and addresses of the top ten unrelated lenders	A general description of how the MNE group is financed, including important financing arrangements with unrelated lenders.	Clause 10 <i>[Not applicable]</i>
A list of group entities that provide central financing functions, including their place of operation and of effective management	The identification of any members of the MNE group that provide a central financing function for the group, including the jurisdiction under whose laws the entity is organised and the place of effective management of such entities.	Clause 11 <i>[Not applicable]</i>
A detailed description of the transfer pricing policies of the international group related to financing arrangements among group entities	A general description of the MNE group's general transfer pricing policies related to financing arrangements between associated enterprises.	Clause 12 <i>[Not applicable]</i>
<b>International group's financial and tax positions</b>	<b>MNE group's financial and tax positions</b>	
A copy of the annual consolidated financial statement of the international group	The MNE group's annual consolidated financial statement for the fiscal year concerned if otherwise prepared for financial reporting, regulatory, internal management, tax or other purposes.	Clause 13 and PDF File – <i>Viney Corporation Group Consolidated Financials – Clause 13</i>

Information requirement as per Rule 10DA ( <i>refer additional requirements as underlined</i> )	OECD TPG 2022 – Paras 5.18 and 5.19 ( <i>Page No. 231 and 232</i> ) read with Annex I to Chapter V ( <i>Page No. 543-544</i> )	Reference in Part B of Form 3CEAA ( <i>India Master File</i> )
A list and brief description of the existing unilateral advance pricing agreements and other tax rulings in respect of the international group for allocation of income among countries	A list and brief description of the MNE group's existing unilateral advance pricing agreements (APAs) and other tax rulings relating to the allocation of income among jurisdictions.	Clause 14 [ <i>Not applicable</i> ]