

FORM NO. 3CEAA [See rule 10DA]

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

Acknowledgement Number -534573410301123



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Income Tax Department, Government of India

Part-A

1. Name of the assessee	VINEY CORPORATION PRIVATE LIMITED
2. Address of the assessee	35, Basement, Community Center, Munirka Marg, Basant Lok, Vasant Vihar-1, Vasant Vihar-1, SOUTH WEST DELHI, Delhi, India - 110057
3. PAN of the assessee	AAACV0446L
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	35, Basement Community Center, Vasant Vihar-1, Vasant Vihar-1, SOUTH WEST DELHI, Delhi, India - 110057
6. Accounting Year for which the report is being submitted	01-Apr-2022 - 31-Mar-2023
7. Number of constituent entities of the international group operating in India	2
8. Name, PAN and address of all the constituent entities included in item no. 7	

Sl. No.	Name of the constituent entities of the international group	Permanent account number of the constituent entities of the international group	Address of the constituent entities of the international group
1	Viney Corporation Private Limited	AAACV0446L	35, Basement Community Center, Munirka Marg, Basant Lok, Vasant Vihar-1, Vasant Vihar-1, SOUTH WEST DELHI, Delhi, India - 110057
2	Viney Auto Ancillary Private Limited	AAJCV1837G	House No.872, Ground Floor, BLK-E, Pitampura, Saraswati Vihar, Saraswati Vihar, NORTH WEST DELHI, Delhi, India - 110034

Part-B

Whether Part B is applicable as per Section 92D of the Income Tax Act, 1961 read with Sub-rule 3(ii) of Rule 10DA? **Yes**

1. List of all entities of the international group along with their addresses

Form3CEAA_Clause_1_Part_B.csv

2. Chart depicting the legal status of the constituent entity and ownership structure of the entire international group

Group Structure - Clause 2.pdf

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

(i) the nature of the business or businesses

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, moulds for plastic material and sheet metal. The group also has presence in the solar power industry and has commissioned a 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.

(ii) the important drivers of profits of such business or businesses	<p>The important drivers of profits of Viney Corporation Group are: a) Multi-location Manufacturing Capability: It operates through 11 production facilities -07 plants in India, 2 plants 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.</p>
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(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

Viney Corporation Supply Chain-Clause 3(iii).pdf

Sl. No.	Name of the product or service	Description of supply chain
1	PDF Attached	PDF Attached

	Viney Corporation Group
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(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	Service Arrangements - Clause 3(iv).pdf
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(v)	a description of the capabilities of the main service providers within the international group
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Sl. No.	Name of the service provider	Address of the service provider	Description of the capabilities
1	Vimercati S.p.A, Italy	Via Vincenzo, Monti 38 200016 Pero, Milano, Italy, Foreign, Italy - 999999	Nature : Provision of marketing support, quality control and information technology (IT) services; Description : a) Preference of European OEM customers to deal with an Italian company vis-a-vis a Romanian company b) Scarcity of required personnel in Romania c) Availability of professional and experienced team and IT infrastructure and servers in Vimercati S.p.A.

(vi)	the transfer pricing policies for allocating service costs and determining prices to be paid for intra-group services	Service : Provision of marketing support, quality control and information technology (IT) services ; TP Policy : 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.
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(vii)	a list and description of the major geographical markets for the products and services offered by the international group
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Sl. No.	Name of the product or services offered	Description of Geographical markets (Country wise)
1	Wiring Harness	India
2	Terminals and Connectors	India
3	Visible Switches and Mechatronic Devices	Germany
4	Visible Switches and Mechatronic Devices	China

Sl. No.	Name of the product or services offered	Description of Geographical markets (Country wise)
5	Visible Switches and Mechatronic Devices	France
6	Visible Switches and Mechatronic Devices	Spain
7	Visible Switches and Mechatronic Devices	United Kingdom Of Great Britain And Northern Ireland
8	Visible Switches and Mechatronic Devices	United States Of America
9	Sliding Door Switches	Italy
10	Sliding Door Switches	France
11	Sliding Door Switches	Romania
12	Sliding Door Switches	Turkey
13	Sliding Door Switches	Poland
14	Steering Wheel Switches	Romania
15	Steering Wheel Switches	Turkey
16	Steering Wheel Switches	Germany
17	Steering Wheel Switches	Portugal
18	Steering Wheel Switches	Brazil

(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.	Viney Corporation Group FAR - Clause 3(viii).pdf
Whether any of the constituent entities of the international group contribute at least ten per cent. of the revenues or assets or profits of such group?	Yes

Sl. No.	Name of the constituent entity	Functions	Assets	Risk
1	PDF Attached	PDF Attached	PDF Attached	PDF Attached

(ix) a description of the important business restructuring transactions, acquisitions and divestments	-
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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

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.

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

Sl. No.	Name of the entity of the international group	Address of the entity of the international group
1	Viney Corporation Private Limited	35, Basement Community Center, Munirka Marg, Basant Lok, Vasant Vihar-1, Vasant Vihar-1, SOUTH WEST DELHI, Delhi, India - 110057
2	Vimercati S.p.A, Italy	Via Vincenzo, Monti 38 200016 Pero, Milano, Italy, Foreign, Iceland - 999999

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

Sl. No.	Intangible property /group of intangible property	Name of the entity who legally owns the intangible property/group of intangible property	Address of the entity
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, Foreign, Italy - 999999
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, Bacau, Foreign, Romania - 607235

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
- 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.
8. Description of the transfer pricing policies of the international group related to research and development and intangible property
- 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 and considers such cost as intangible assets in its books of account.
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

Sl. No.	Description of the intangible property	Name of the selling entity(s)	Address of the selling entity(s)	Name of the buying entity(s)	Address of the buying entity(s)	Compensation paid	Currency
				No Records Added			

10.	Detailed description of the financing arrangements of the international group, including the names and addresses of the top ten unrelated lenders	
	Not Applicable	
11.	List of group entities that provide central financing functions, including their addresses of operation and of effective management	

Sl. No.	Name of the group entity	Address of operation	Address of effective management
No Records Added			

12.	Detailed description of the transfer pricing policies of the international group related to financing arrangements among group entities	Not Applicable
13.	A copy of the annual consolidated financial statement of the international group	Viney Corporation Group Consolidated Financials - Clause 13.pdf
14.	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	Not Applicable

Verification

I, **BRIJESH AGGARWAL**, son of Shri **VED PARKASH AGGARWAL** hereby declare that I am furnishing the information in my capacity as **Managing Director** (designation) of **VINEY CORPORATION PRIVATE LIMITED** (name of the assessee) and I am competent to furnish the said information and verify it.

Name of the Signatory

BRIJESH AGGARWAL

Address of the declarant

**D-631, 1st Floor, Saraswati Vihar,
Saraswati Vihar, Saraswati Vihar,
NORTH WEST DELHI, Delhi, India -
110034**

PAN of the declarant

AALPA3343B

Place

New Delhi

IP Address

103.248.119.82

Date

30-Nov-2023

Acknowledgement Number - 534573410301123

This form has been digitally signed by DINESH CHAND SHARMA having PAN AKZPS5524L from IP Address 103.248.119.82 on 30-Nov-2023 10:43:19 AM

Dsc SI No and issuer 21726536CN=e-Mudhra Sub CA for Class 3 Individual 2014,C=IN,O=eMudhra Consumer Services Limited,OU=Certifying Authority



Viney Corporation Group
Master File - FY 2022-23**Clause 1 - List of all entities of the international group along with their addresses**

S. No.	Company Name	Address
1	Viney Corporation Private Limited, India	E-872, First Floor, Saraswati Vihar, Pitampura, New Delhi 110034
2	Viney Auto Ancillary Private Limited, India	House No.872,"Ground Floor, BLK-E",110034, Saraswati Vihar, Pitampura, North West Delhi, Delhi
3	Vimercati S.p.A, Italy	Via Vincenzo, Monti 38 200016 Pero, Milano, Italy
4	Viney Corporation Middle East Limited, U.A.E.	P. O. Box 17870, Dubai, UAE
5	Vimercati East Europe S.r.L., Romania	Strada Garii, NR 100, Hemius 607235, Bacau, Romania
6	Viney Corporation East Europe S.r.L., Romania	Via Calea Romanului, Nr.5,Bacau, Romania-600384
7	Progind S.r.L, Italy	Satrada Tomboletto 1, 10010 Azeglio, Torino, Italy

Viney Corporation Group
Group Chart as on 31st March 2023



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:

Nature of Products	Percentage of consolidated group revenue
Visible Switches and Mechatronic Devices	24.64%
Steering Wheel Switches	22.54%
Wiring Harness	18.68%
Terminals and Connectors	8.30%
Sliding Door Switches	6.09%

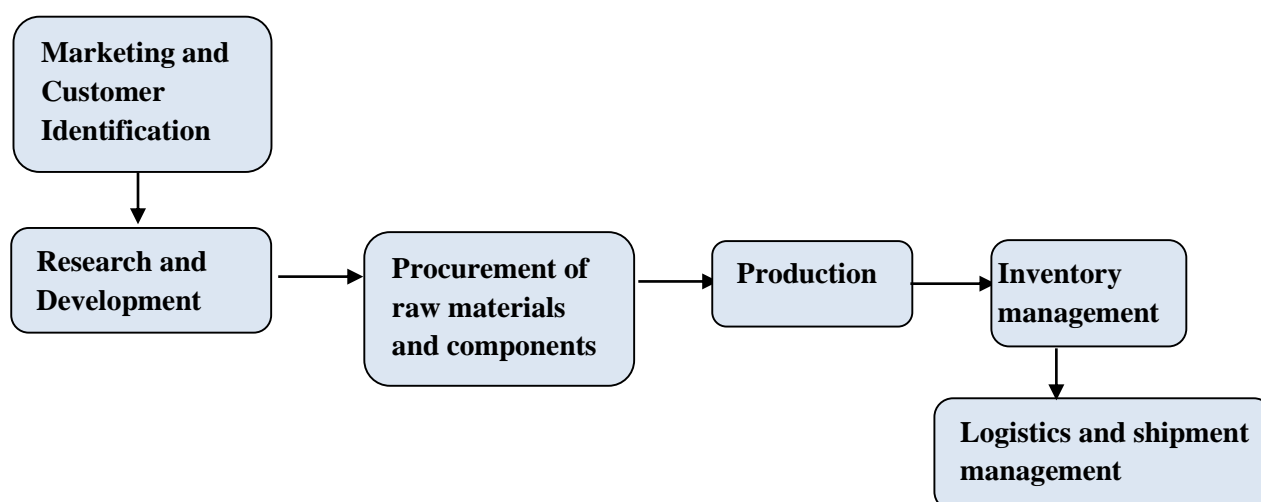
Viney Corporation Group is a multinational auto-component manufacturing conglomerate, with disintegrated value chain around manufacturing, marketing and distribution supply chain for the global automotive industry.

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, Progind S.r.L., 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, moulds for plastic material and sheet metal.

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 all 3 entities named Vimercati SpA Italy, Progind S.r.L., 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 **11** production facilities – **7** plants in India and **4** plants overseas in Italy (2 plants) 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 S.p.A, 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	✓	✓	✓
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 & Customer identification function for European operations are centralized under Vimercati S.p.A, Italy. This function is responsible for connecting customers with all 3 entities named Vimercati SpA Italy, Progind S.r.L., 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	Research & Development (R&D)	<p>For Viney Corporation Group, R&D is a very important function in the complete value 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.</p> <p>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.</p>	<p>(a) Viney Corporation Private Limited, India (b) Vimercati S.p.A, Italy</p>
3	Scheduling of production and deliveries	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 (e) Progind S.r.L., Italy</p>
4	Raw material procurement	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 (e) Progind S.r.L., Italy
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"> • Forecasting: Production forecasting to determine the volume and product mix to be produced on a weekly basis. • Processing: Conversion of raw material into finished products. • Quality Control: The group manufacturer entities are responsible for maintaining quality control standards in their plants and monitoring quality results. • Logistics and warehousing: Inbound logistics activities related to the storage of materials, components, semi- manufactured goods, including inventory management & 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. 	(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 (e) Progind S.r.L., Italy
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 (e) Progind S.r.L., Italy

Overview of the functions performed			
S. No.	Functions Performed	Function Description	Viney Corporation Group - Key Group Entity
7	General Administration	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 (e) Progind S.r.L., Italy
7	Internal Group Finance	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 (e) Progind S.r.L., Italy

2.2 Assets used

Overview of Assets used			
S. No.	Assets	Description	Group Entity
1	Tangible assets	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 (e) Progind S.r.L., Italy

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.	<p>Following entities own relevant intangibles as required for performing their respective functions:</p> <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 (e) Progind S.r.L., Italy</p>

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 (d) Progind S.r.L., Italy</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 (e) Progind S.r.L., Italy
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 (e) Progind S.r.L., Italy
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 (e) Progind S.r.L., Italy
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 S.r.L., Romania (d) Viney Corporation 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 scrapped 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>(e) Progind S.r.L., Italy</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> <p>(e) Progind S.r.L., Italy</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.

Viney Corporation Private Limited
Consolidated Balance Sheet as at 31 March 2023
CIN:- U74999DL1992PTC047911
(All amounts are in Rupees million, unless otherwise stated)

Particulars	Notes	As at 31 March 2023	As at 31 March 2022
Assets			
Non-current assets			
Property, plant and equipment	4	3,809.4	2,840.6
Right of use assets	4A	138.5	113.2
Capital work in progress	4B	182.0	202.5
Goodwill	5	657.0	1,344.5
Other intangible assets	5	403.5	362.8
Intangible assets under development	6	269.0	186.0
Financial assets:			
Investments	7	173.8	354.7
Other financial assets	8	71.8	74.7
Non current tax assets (net)	9	170.4	200.6
Other non current assets	10	12.6	21.5
		5,888.0	5,701.1
Current assets			
Inventories	11	3,322.5	3,185.2
Financial assets			
Investments	7C	90.8	182.1
Trade receivables	12	2,466.0	2,460.5
Cash and cash equivalents	13	708.0	572.5
Other bank balances	14	14.8	5.8
Other financial assets	8	43.9	91.1
Other current assets	10	211.3	188.1
		6,857.3	6,685.2
		12,745.3	12,386.3
Total assets			
Equity and liabilities			
Equity			
Equity share capital	15	184.0	184.0
Other equity	16	4,532.4	4,317.5
		4,716.4	4,501.5
Liabilities			
Non-current liabilities			
Financial liabilities			
Borrowings	17	1,725.5	2,560.4
Lease liabilities	4A	50.2	64.4
Provisions	18	22.7	21.7
Deferred tax liabilities (net)	19	416.9	268.6
		2,215.3	2,914.9
Current liabilities			
Financial liabilities			
Borrowings	17	3,128.3	2,574.9
Lease liabilities	4A	13.8	18.8
Trade payables	20		
Total outstanding dues of micro enterprises and small enterprises		18.9	14.6
Total outstanding dues of creditors other than micro enterprises and small enterprises		2,006.2	1,851.3
Other financial liabilities	21	49.6	64.3
Other current liabilities	22	284.0	224.4
Provisions	18	193.1	168.2
Current tax liabilities (net)	23	119.7	53.3
		5,813.6	4,969.8
		12,745.3	12,386.3
Total equity and liabilities			

For VINEY CORPORATION PRIVATE LIMITED

MANAGING DIRECTOR

For VINEY CORPORATION PRIVATE LIMITED

Authorised Signatory

Viney Corporation Private Limited
Consolidated Statement of Profit and Loss for the period ended 31 March 2023
CIN:- U 74199DL1992PTC047911
(All amounts are in Rupees million, unless otherwise stated)

Particulars	Notes	For the year ended 31 March 2023	For the year ended 31 March 2022
Income			
Revenue from operations	24	11,200.6	10,353.7
Other income	25	141.4	521.6
Total income		11,342.0	10,875.3
Expenses			
Cost of materials consumed	26A	5,778.5	5,321.1
Purchases of stock in trade	26B	-	128.8
Changes in inventories of work-in-progress and finished goods	27	(55.3)	(39.1)
Employee benefits expense	28	2,200.7	2,009.5
Other expenses	29	1,817.0	1,639.3
Expenses before finance cost, depreciation and amortisation expense and exceptional item		9,740.9	9,059.7
Profit before finance cost, depreciation and amortisation expense and exceptional item		1,601.2	1,815.6
Finance costs	30	209.4	321.5
Depreciation and amortisation/ impairment expense	31	712.3	739.9
Total expenses		10,662.6	10,121.1
Profit before exceptional item and tax		679.5	754.2
Exceptional items	29A	831.7	282.7
Profit before tax		(152.3)	471.5
Tax expense:			
- Current tax expense	19	128.0	126.6
- Tax adjustment relating to earlier years	19	105.0	22.5
- Deferred tax credit	19	(8.5)	(12.7)
Total tax expense		224.5	136.4
Profit before share of profit/(loss) of associates and after tax		(376.7)	335.1
Share of profit of associate		2.0	1.8
Total profit after share of profit of associates		(374.7)	336.9
Other comprehensive income (OCI)			
Items that will not be reclassified to profit or loss			
Re-measurement gain/(losses) on defined benefit obligations/assets	19	2.5	1.7
Income tax effect		(0.6)	(0.4)
Revaluation surplus		844.6	-
Income tax relating to revaluation surplus		(158.0)	-
Items that will be reclassified subsequently to profit or loss		149.7	(31.5)
Foreign currency translation reserve		838.1	(30.2)
Other comprehensive income for the year (net of tax)		463.4	306.7
Total comprehensive income for the year		463.4	306.7
Basic and diluted earnings per equity share (nominal value of share Rs 10 each)	16A	(20.37)	18.31

For VINEY CORPORATION PRIVATE LIMITED


MANAGING DIRECTOR

For VINEY CORPORATION PRIVATE LIMITED


Authorised Signatory

Viney Corporation Private Limited
Consolidated Statement of Changes in Equity for the year ended 31 March 2023
CIN:- U74899DL1992PTC047911
(All amounts are in Rupees million, unless otherwise stated)

A Equity share capital		Number of shares		Amount
Balance as at 31 March 2021		18,400,500		184.0
Changes in equity share capital during 2021-22		-		-
Balance as at 31 March 2022		18,400,500		184.0
Changes in equity share capital during 2022-23		-		-
Balance as at 31 March 2023		18,400,500		184.0

B Other equity		Reserves and surplus			Other comprehensive income		Total
Attributable to equity shareholders		Legal reserve	Capital redemption reserve	Retained earnings	Foreign currency translation reserve	Revaluation reserve	
Particulars							
Balance at 1 April 2021	84.4	37.0	3,896.0	232.7	-	-	4,250.1
Profit for the year	-	-	337.0	-	-	-	337.0
Other comprehensive income (net of tax)	-	-	1.3	(31.5)	-	-	(30.2)
Final dividend on equity shares	-	-	(239.3)	-	-	-	(239.3)
Creation of legal reserve	11.6	-	(11.6)	-	-	-	-
Balance as at 31 March 2022	96.0	37.0	3,983.4	201.2	-	-	4,317.5
Balance at 1 April 2022	96.0	37.0	3,983.3	201.2	-	-	4,317.5
Loss for the year	-	-	(374.7)	-	-	-	(374.7)
Other comprehensive income (net of tax)	-	-	1.8	149.7	-	-	151.5
Revaluation reserve on land	-	-	-	-	-	844.6	844.6
Tax impact on revaluation reserve	-	-	-	-	-	(158.0)	(158.0)
Final dividend on equity shares	-	-	(248.5)	-	-	-	(248.5)
Creation of legal reserve	4.9	-	(4.9)	-	-	-	-
Balance at 31 March 2023	100.9	37.0	3,357.0	350.9	686.6	-	4,532.4

For VINEY CORPORATION PRIVATE LIMITED


MANAGING DIRECTOR

For VINEY CORPORATION PRIVATE LIMITED


Authorised Signatory

Viney Corporation Private Limited
Consolidated Cash flow statement for the year ended 31 March 2023
CIN: U74899DL1992PTC047911
(Amounts are in Rupees million, unless otherwise stated)

Particulars	For the year ended 31 March 2023	For the year ended 31 March 2022
A. Cash flow from operating activities		
Profit/(Loss) for the year before tax and after share of profit of associate	(150.3)	473.3
Adjustments for:		
Depreciation and amortisation/impairment expense	712.3	639.9
Impairment of goodwill	686.7	282.7
Share of profit from associate	(2.0)	(1.8)
Bad debts	146.9	-
Net fair value (profit) / loss on financial assets mandatorily measured at fair value through profit or loss	10.8	(98.4)
Provision for loss allowance	11.7	(1.9)
(Profit) / loss on sale of property, plant and equipment	(0.9)	-
Finance costs	209.4	321.5
Provision for diminution in the value of inventory	-	(4.1)
Interest on		
Fixed deposits	(3.7)	(10.7)
Others	(14.4)	(0.1)
Profit on sale of non current investment	(6.8)	(235.3)
Operating profit before changes in assets and liabilities	1,599.8	1,365.1
Adjustments for changes in assets and liabilities		
(increase)/Decrease in inventories	(137.4)	(653.4)
Decrease / (increase) in trade receivables	(164.1)	(428.7)
Decrease/(increase) in loans, other financial assets and other current assets	35.8	368.2
Increase in trade payables	159.2	(291.0)
Increase/(Decrease) in other current liabilities, lease liabilities, other financial liabilities and provisions	70.8	107.1
	(35.7)	(897.8)
Cash generated from operations	1,564.1	467.3
Income tax paid	(133.3)	(220.1)
Net cash generated from operating activities	1,430.8	247.2
B. Cash flow from investing activities		
Purchase of property, plant and equipment	(949.5)	(875.8)
Increase / (decrease) in deposits having original maturity of more than 3 months	(9.0)	216.9
Purchase of Subsidiaries during the year (refer note 41)	-	(233.6)
Interest received	3.7	10.7
Proceeds from sale of investment	268.3	100.2
Net cash used in investing activities	(686.6)	(781.6)
C. Cash flows from financing activities		
Repayments from long-term borrowings (net)	(711.5)	(234.6)
Proceeds of short-term borrowings (net)	430.1	875.0
Payment of lease liabilities (principal and interest)	(19.2)	(37.8)
Finance cost paid	(209.4)	(321.5)
Dividend paid	(248.5)	(239.3)
Net cash (used)/generated in financing activities	(758.5)	41.8
Net increase / (decrease) in cash and cash equivalents (A+B+C)	(14.3)	(492.6)
Cash and cash equivalents at the beginning of the year	572.5	1,096.6
Effect of exchange rate on foreign currency cash and cash equivalents	149.7	(31.5)
Cash and cash equivalents at the end of the year	708.0	572.5

For VINEY CORPORATION PRIVATE LIMITED


MANAGING DIRECTOR

For VINEY CORPORATION PRIVATE LIMITED


Authorised Signatory

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 2022-23 has been enclosed. The seven constituent entities of the Group, namely:

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

Information requirement as per Rule 10DA (refer additional requirements as underlined)	OECD TPG 2022 – Paras 5.18 and 5.19 (Page No. 231 and 232) read with Annex I to Chapter V (Page No. 543-544)	Reference in Part B of Form 3CEAA (India Master File)
Organizational Structure	Organizational Structure	
<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 – Viney Corporation Group Chart
Description of the international group’s business	Description of MNE group’s business(es)	

The nature of the business or businesses (General written <u>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		Clause 3 (ii)

8. 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 (refer additional requirements as underlined)	OECD TPG 2022 – Paras 5.18 and 5.19 (Page No. 231 and 232) read with Annex I to Chapter V (Page No. 543-544)	Reference in Part B of Form 3CEAA (India Master File)
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 – Viney Corporation Group Supply Chain Clause 3(iii)
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 – Viney Corporation Group Service Arrangements - Clause 3(iv)
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 – Viney Corporation Group FAR - Clause 3(viii)
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) [Not applicable]
International group's intangibles	MNE group's intangibles (as defined in Chapter VI of these Guidelines)	
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 (refer additional requirements as underlined)	OECD TPG 2022 – Paras 5.18 and 5.19 (Page No. 231 and 232) read with Annex I to Chapter V (Page No. 543-544)	Reference in Part B of Form 3CEAA (India Master File)

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 [Not applicable]
International group's intercompany financial activities	MNE group's intercompany financial activities	
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 [Not applicable]
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 [Not applicable]
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 [Not applicable]

International group's financial and tax positions	MNE group's financial and tax positions	
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 – Viney Corporation Group Consolidated Financials – Clause 13
Information requirement as per Rule 10DA (refer additional requirements as underlined)	OECD TPG 2022 – Paras 5.18 and 5.19 (Page No. 231 and 232) read with Annex I to Chapter V (Page No. 543-544)	Reference in Part B of Form 3CEAA (India Master File)
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 [Not applicable]

Viney Masterfile FYE 31/03/2023 Table of references

Ch. (Italian structure)	Content (Italian structure)	Reference to the Group's MasterFile
1	Group organizational structure	Clause 1 Clause 2
2	Description of Group's business	Clause 3 (i)
2.1	Important drivers of business profit	Clause 3 (ii)
2.2	Transaction flows (description of the production and/or distribution chain related to the top-five products and/or services of the group in terms of turnover)	Clause 3 (iii)
2.3	Arrangements for the provision of intra-group services	Clause 3(iv), Clause 3 (vi)
2.4	Main geographic markets	Clause 3 (vii)
2.5	Operative structure and value chain	Clause 3 (viii) and PDF File – Viney Corporation Group FAR - Clause 3(viii)
2.6	Business restructuring operations	Clause 3 (ix)
3	Group's intangibles	
3.1	Group's strategies	Clause 4
3.2	Intangible assets	Clause 5 , 6
3.3	Agreements relating to intangible assets	Clause 7
3.4	Transfer Pricing policy for R&D activities	Clause 8
3.5	Relevant operations related to intengibles	Clause 9
4	Intra-Group financial activities	
4.1	Financing arrangements	Clause 10 [Not applicable]
4.2	Centralised financing functions	Clause 11 [Not applicable]
4.3	Transfer Pricing Policy related to financing arrangements	Clause 12 [Not applicable]
5	Group's financial relations	
5.1	Consolidated financial statements	Clause 13
5.2	Agreement relating to financial operations	Clause 14 [Not applicable]