

New Paths Newer Aspirations





Courtesy Tata Central Archives

In a free enterprise, the community is not just another stakeholder in business, but is in fact the very purpose of its existence.

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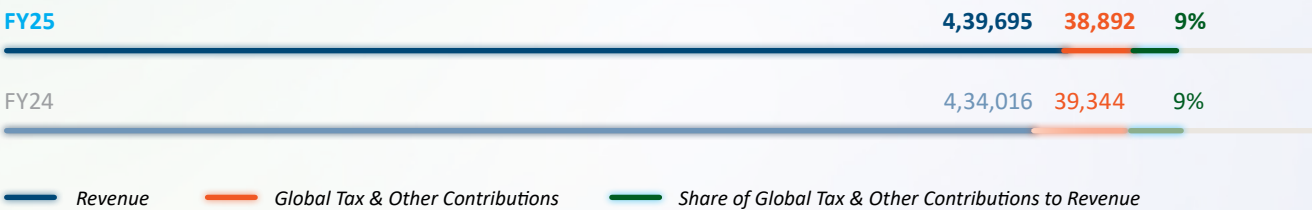


Introduction

We recognize that the tax that we account for, and pay is an important aspect of our wider economic and social impact of the Tata Motors group. Tata Motors is always guided by the Tata Code of Conduct, hence accountability is rooted in all aspects of its decision. The focus is not only product sustainability but also operational sustainability with strong governance structure around all practices including tax. In recent years there has been a growing trend for corporates to share more details regarding their tax contributions. In keeping with the current trend and focus, Tata Motors presents its approach to tax related matters and its Global Tax & Other Contributions in this first tax Transparency Report thereby endorsing its commitment to tax accountability that in turn plays a key role in sustainability. This would also address the changing tax environment globally, requiring public disclosures of tax related parameters. The Tax Transparency Report is a voluntary disclosure to be read together with our Integrated Annual Report. Visit our website www.tatamotors.com to access the 80th Integrated Annual Report and learn more about our sustainability and business achievements.

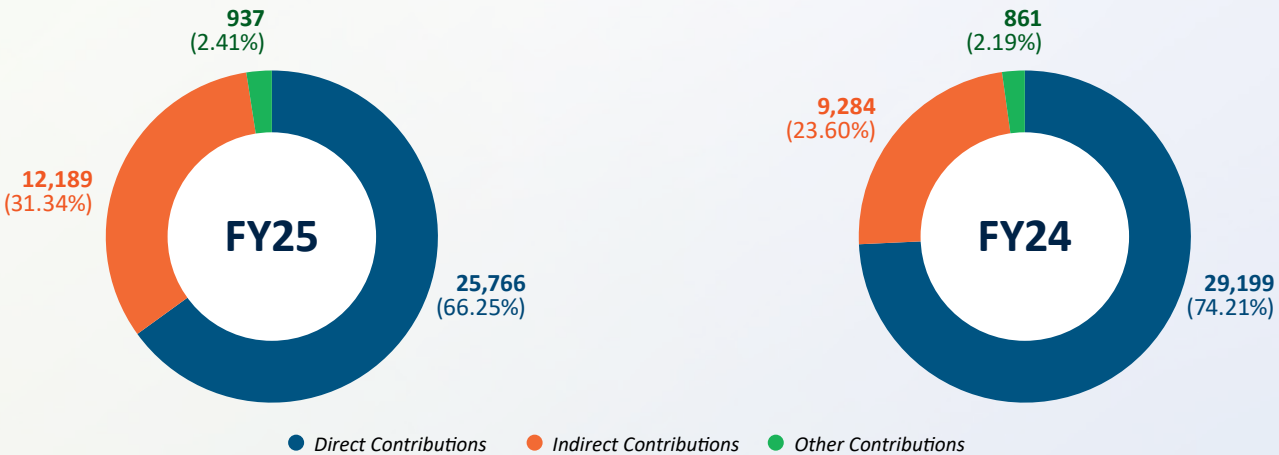
Global Tax & Other Contributions Summary

(₹ crore)



Category wise Summary

(₹ crore)



Our Approach to Tax

We at Tata Motors are highly conscientious in our tax related obligations across the group driven by our values inherent to the Tata Code of Conduct. This responsible tax outlook within the Tata Motors group besides focusing on the governance and accountability matrix, also supports trainings conducted for tax resources. These trainings relate to audit readiness, changes in the tax laws, and various updates in the ever-changing tax and regulatory landscape.

Our employees and assets are located in numerous countries around the world through our subsidiaries and branches. We are committed towards complying with the tax laws and regulations of the countries where we operate with zero tolerance towards non-compliance ensuring that all the tax decisions are taken based on local applicable tax laws and are validated by experts, where necessary. Business decisions are driven by substance and never based on engineered tax planning.

We are committed to pay taxes in the countries where the value is created. We believe that our accountable and efficient mode of operation is pivotal to our success. Further, all our stakeholders, consumers, investors/ shareholders, vendors and employees lay emphasis on accountability wherein being a responsible taxpayer is an integral part. Our focus on tax functions is guided by key tax principles, which are aligned with our business behaviours across our global operations.

Key tax principles

The following are the key principles in relation to our approach to tax matters and the conduct of our tax affairs. We adhere to a transparent approach, ensuring full disclosure of our activities to all stakeholders.

1 Compliance:

We act with integrity, both within the letter and spirit of all tax legislation and relevant international standards. We have a zero tolerance to tax evasion, including the evasion of tax by third parties associated with our business. As a commercially driven organization, we consider the tax consequences of our decisions, but we do not engage in transactions without commercial substance with the sole purpose of avoiding tax. In making business decisions we seek to maximize value to our stakeholders. Tax decisions are driven by core values of integrity, unity and responsibility and planning is driven by commercial rationale. Our commitment to ethical taxation is built on a foundation of unwavering integrity and rigorous adherence to statutory laws and regulations. We approach our responsibilities with earnest sincerity, ensuring the timely payment of all relevant taxes in all the jurisdictions we operate.

2 Robust Internal Controls:

We proactively seek to identify, manage, and mitigate any potential tax risks, staying abreast of key changes and trends in tax matters through our internal control systems and external advisors/consultants as needed.

3 International tax:

We embrace business unity to ensure that our international tax affairs are aligned and kept current with the substance of our business operations and international tax guidance. We do not engage in any form of artificial tax structuring or use any offshore tax havens. Our subsidiaries are located in countries where the business has significant physical and economic operations. We claim reliefs, credits, incentives and exemptions that are legislated in the countries in which we operate.

4 Stakeholder Relationships:

We seek to maintain trusting, transparent and constructive relationships with tax authorities, and proactively participate in dialogues with industry and advocacy bodies to shape effective future tax policy and create shared value. We believe in open communication with all our stakeholders regarding our business substance and any tax related decisions.

5 People:

We invest in our people, their continued learning and growth to deliver on these commitments.

Our approach to tax governance and risk

Our corporate philosophy is led by ethical, fair and transparent governance practices. Our corporate governance practices are consistent with international best practices and standards. In consonance with the Tata Group's enduring legacy of ethical governance, Tata Motors' corporate philosophy derives and exercises its commitment to ethical, transparent and accountable governance practices through its corporate governance framework. This framework underscores its commitment to upholding accountability and transparent governance practices. Our governing principles are driven by a sense of responsibility and fairness, ensuring that our leaders – and our work – are always guided by the best interests of all our stakeholders. This approach to governance percolates to the tax function within the group.

Furthermore, the Board of Directors, together with its committees, ensures that the Company is able to conduct its business responsibly and uphold the best interests of its diverse stakeholders by ensuring fairness, independence and transparency in all its decisions through the governance framework. They specifically review all financial and non-financial information, specifically Environment, Social and Governance (ESG) functioning of the Company.



We at Tata Motors, appreciate our operational complexity being spread across multiple jurisdictions with various complex regulations. This lends an inevitable inherent degree of tax uncertainty in the operational level, which might not always be visible and hence immediately addressable. However, we address tax uncertainties by partnering with business units to provide timely tax advice. At all times, our endeavour is to ensure that such business decisions are evaluated for all tax implications and vetted by local tax experts to ensure adherence to all local tax regulations as well as compliances.

Where local legislation permits, we may seek advance agreement from the relevant tax authority, including advance tax ruling or advance pricing agreements to ensure that we do not pay tax on the same profits twice. In the event of any audit activity or scrutiny, we seek to engage with the relevant tax authorities to provide all relevant information in a transparent and timely manner to resolve any matters efficiently and effectively.



Managing our tax risk

Our tax matrix i.e., the process for managing tax function involves the direct and indirect tax verticals separately reporting to the leadership. The two verticals are further structured such that centrally many of the group companies are catered to with respect to various functionalities as detailed below:

Centralized Drive: Planning, strategy, overall compliance review, advisory, assessments, investigations & litigations, have a centralized approach. The functions performed involves unlocking of funds through driving tax refunds, credits, lower deduction certificate (LDC), disposal of litigations etc. It ensures uniform tax positions through proactive initiatives. It provides support for restructuring, and mergers and acquisitions (M&A) activities of the group while assisting in simplifying the related party transactions policy and benchmarking. The various international tax updates and changes are coordinated as they form the core of advocacy initiatives.

Centralized Delivery: The operational support in terms of compliances is performed centrally, wherever possible. Process improvements through implementation of automation & analytics is a focus. Support is provided to the various entities in the group where needed through the central delivery mechanism.

We seek to take a unified and consistent approach to tax positions and compliance, whilst acknowledging that each country has its own tax law and practice that must also be taken into account. Working closely with the business and applying relevant expertise and capabilities, we align business strategy with robust compliance. Where required we seek external validation of any positions taken. Based on the magnitude of the impact, the decision mechanism flows to the Audit Committee (AC) and the Board of Directors.

The preservation of the governance and compliance framework is facilitated by appropriately qualified and experienced tax resource supported with technology. The tax and finance function teams consist of several qualified accountants with the skills, knowledge and experience to manage the Company's tax affairs, who undertake mandatory Continuing Professional Development (CPD) training to stay up to date with the relevant tax compliances. Further they are supported with customized adoption of technology to monitor and ensure global compliance standards are met [including management of any litigations]. Tools are used for preparation of essential reports including tax computations, deferred tax, Country-by-country reporting (CbCR) and related party transaction (RPT).

Tax Strategy

We maintain a robust risk framework as detailed above to ensure adherence to the key tax principles. We achieve this through internal reviews, refreshing our policies periodically and seeking external advice wherever required in case of interpretational issue or uncertainty. Tata Motors as a group maintains a limited appetite for tax risk and guided by our principles and code of conduct, we continuously strive to limit tax risks at all levels of the decision-making process.

The day-to-day management of tax affairs rests with tax function, comprising an appropriate blend of tax professionals. All have the necessary qualifications, training, skills and experience required to effectively undertake their roles and ensure that our compliance standards are met. The Tax function also advises the Company's Senior Management in relation to setting Group tax strategy and policy. Where appropriate, we look to implement technology-based solutions to track compliance, streamline processes, drive efficiency and manage risk including reviews and escalation.



Our Approach to Compliance

We adhere to the regulatory compliances pertaining to all taxes including Related Party Transactions (RPT) as required by the various jurisdictions in which we operate. Our approach to some of the key requirements are as below:

Annual compliances

In the TML group of companies, annual compliances are undertaken, monitored and executed centrally with proper maker-checker-reviewer framework. Review and approvals by Business Controllers and CFOs are performed basis control designed and implemented around the tax functions. These controls are monitored through customized tools that are continuously tested by in-house teams and auditors.

Litigation

Robust monitoring system includes centralized litigation repository. Further, the standard procedure involves representation through best of the counsels including senior counsels in appellate and court matters.

Litigation mitigation

Our standard approach is to adopt well validated and strong tax positions on controversial or any tax adjustments. Endeavour remains to partner with the tax authorities at adjudication stage. The group may also enter into Advance Pricing Agreements (APAs) / Bilateral Advance Pricing Agreements (BAPA) where practical.

BEPS 1.0

CbCR is prepared centrally, with insights, review and approval by Group Controller and Group CFO. Use of organization wide tool integrated with the Enterprise Resource Planning (ERP) is under implementation. Masterfile is similarly developed centrally with similar review and approval mechanism being adopted.

BEPS 2.0

We have onboarded tax experts to assist in the initial phase of the BEPS 2.0 compliances. We are also adopting an organization wide tool integrated with the ERP to facilitate the intricate compliance requirement in the multiple jurisdictions that have already adopted BEPS 2.0.

Related party transactions

Tata Motors as a group have multiple transactions not only amongst its various subsidiaries but also with other Tata Group entities. For example, purchases of raw materials are made from Tata Steel, while distribution of its cars in Africa region is conducted through Tata International, both part of the Tata Group. However, for any such transaction, utmost care is taken to ensure that arm's length principle is adhered to by the transacting entities within the Tata Motors group. We have adopted technology to ensure that such related party transactions are not conducted without an arm's length policy in place that is vetted by professionals and basis materiality is also approved by the AC or the shareholders, as required under SEBI (LODR) in India. The Company at the beginning of each financial year places all its related party transaction details including, transacting entity names, value of transaction and the arm's

length pricing policy for an 'Omnibus' approval to the AC. The Company also reviews Omnibus versus actual transactions on a quarterly basis and changes, if any, are considered. New transactions are evaluated for arm's length pricing before being concluded.

Globally, we also proactively reach out to tax authorities for negotiating APAs wherever it is a practical solution.

Advocacy and relationship with regulators

We at Tata Motors believe in open and transparent communication with all our stakeholders. Our approach to tax authorities and other industry regulators also endorses a similar approach. In India, Tax Heads participate through industry bodies such as Society of Indian Automobile Manufacturers (SIAM), Confederation of Indian Industries (CII) as well as at Tata Group level for effective industry related advocacy.

We have been closely working with government and tax administrator on policy, administration and technology related issues.

In the various other jurisdictions we operate, our approach to policy matters relating to our industry has been similar. We work with the local industry bodies and government to communicate our position on any policy decisions.

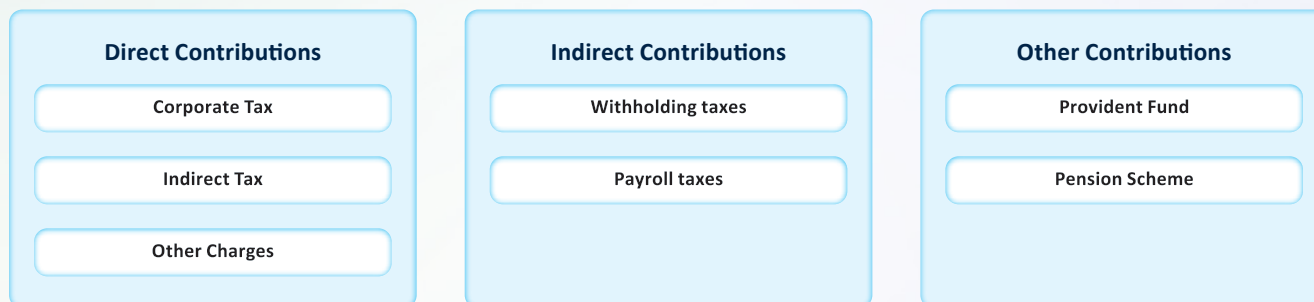
As far as tax authorities are concerned, we maintain an amicable relation basis our approach of paying the right amount of tax at the right time. However, there are at times certain interpretational issues that might result in litigations, which are usually addressed with help of external expert counsels. Wherever possible we also explore options of advance pricing arrangements both unilateral and bilateral.

Global Tax & Other Contributions

Background

The Global Tax & Other Contributions summarized in this section provides the total payments made directly or indirectly to the Government. As a part of direct contributions, disclosures in relation to corporate tax, net indirect taxes, and other charges are aggregated for representation at each business group level. The indirect contributions include the payments made on behalf of other stakeholders to the Government, including withholding and payroll taxes. Other non-tax payments such as employer's provident fund and employee pension scheme constitute the other contributions category.

Global Tax & Other Contributions : Categories



EXAMPLES OF THE CONTRIBUTIONS

Direct contribution

CORPORATE TAX

- 1 Corporate Income Tax
- 2 Surcharge and cess
- 3 Corporate tax credit and incentives

NET INDIRECT TAXES

- 1 Goods and Service Tax (GST)
- 2 Custom Duties (all types)
- 3 Value Added Tax (VAT)
- 4 Sales and Use Tax

OTHER CHARGES

- 1 Stamp duty
- 2 Property tax
- 3 Gas & Electricity Duties
- 4 Motor vehicle tax
- 5 Climate Change levy

Indirect contribution

WITHHOLDING AND PAYROLL TAXES

- 1 Withholding taxes collected from employee/Payroll taxes
- 2 Withholding taxes (WHT) collected from vendor
- 3 Withholding taxes collected from shareholder
- 4 Tax collected at source (TCS) for sale to customers
- 5 Professional taxes
- 6 Foreign Worker Levy
- 7 Work Permit Levy

Other contribution

OTHER CONTRIBUTION

1. Provident Fund
2. Employee Pension Scheme
3. Employee State Insurance
4. Labour Welfare Fund
5. National Insurance
6. Social Security Fund
7. Compensation Funds
8. Disable Person Funds
9. Gratuity Scheme
10. Superannuation Scheme



Global Tax and Other Contributions FY25

₹ 38,892 crore

Total Contributions

₹ 25,766 crore

Direct Contributions

₹ 12,189 crore

Indirect Contributions

₹ 937 crore

Other Contributions

Tata Commercial and Passenger Vehicle*

₹ crore

Direct 9,541

Indirect 3,552

Others 299

Other business*

₹ crore

Direct 846

Indirect 618

Others 108

Jaguar Land Rover*

₹ crore

Direct 15,379

Indirect 8,019

Others 530

Global Tax and Other Contributions FY24

₹ 39,344 crore

Total Contributions

₹ 29,199 crore

Direct Contributions

₹ 9,284 crore

Indirect Contributions

₹ 861 crore

Other Contributions

Tata Commercial and Passenger Vehicle*

₹ crore

Direct 9,465

Indirect 2,519

Others 317

Other business*

₹ crore

Direct 389

Indirect 349

Others 46

Jaguar Land Rover*

₹ crore

Direct 19,345

Indirect 6,416

Others 498

* refer Entity Schedule

Basis of preparation

Reporting entities

We have reported the Global Tax & Other Contributions to the Government by Tata Motors Limited, our subsidiaries and joint operations (excluding associates). The contribution made by Tata Motors Limited and its subsidiaries including branch offices are reported at full amounts and that for joint operations is reported in the proportion of shareholding. However, the entities which were liquidated/demerged in the said financial year or are under process of liquidation or yet to commence operations or have insignificant operations as on particular finance year end (March 31, 2024 or March 31, 2025) have been excluded from reporting for that particular year, but if they have paid any taxes during the year, the entity has been considered for reporting.

Further, certain foreign companies follow calendar year basis in multiple tax compliances, whereas our reporting period is April to March. Accordingly, for this reporting, the contributions paid as per our reporting period of April to March have been considered.

The entire list of entities at business group level considered in this report has been included in the Entity Schedule.

Methodology

We have reported Global Tax & Other Contributions under cash basis unless otherwise mentioned below. The reporting methodology followed for each type of Global Tax & Other Contributions has been detailed below.

Direct contributions

Corporate tax

This comprises Corporate Income Tax. These taxes are the actual payments made net of refunds received during the financial year with respect to corporate income tax liability of the same year and/or of previous years. Typically, these taxes would be reflected in various statutory periodic forms/returns and statements/

challans or any other documents being filed with the relevant government authorities, or audited cash flow statements, or bank statements evidencing the payments or statements from third party payment partners honouring the obligations.

Other taxes and charges

This comprises stamp duty, property tax, land revenue, municipal tax, electricity duty borne (including cross subsidy surcharge paid), and any other similar contribution by the Company and its subsidiaries. The same have been compiled based on payments to the Government exchequer and/ or challans and bank statements.

Net indirect taxes

Amounts reported represent indirect tax payments remitted to the Government on cash basis.

Indirect tax payments made for reverse charge liability and on imports paid in cash form part of the amount reported. However, it may be noted that the payment of taxes on procurements paid to vendors have not been considered here. Typically, the amounts reported under net indirect taxes have been obtained from various statutory periodic forms/ returns and statements/ challans/ relevant Government portals or any other documents being filed and maintained with the relevant Government authorities.

Indirect contributions

Indirect contributions include tax deducted at source (withholding taxes) from vendors and employees, taxes collected from customers and other payroll taxes. A withholding tax is an income tax to be paid to the Government by the payer of the income rather than by the recipient of the income. The tax is thus withheld or deducted from the income due to the recipient. Withholding taxes usually apply to payments made to employees, vendors, service providers, etc., of the Company. This also includes taxes

collected on various payments received from customers for prescribed goods or services. In addition, payroll taxes include professional and work permit levies that are withheld from employee remuneration and paid to the Government by the respective companies in the capacity of an employer. Typically, these taxes are reflected in various forms, returns, statements and challans prescribed or approved by the Government for this purpose.

Other contributions

Other contributions include contributions made by the employer to social security programmes for the benefit of employees as mandated by regulatory bodies. This includes the employer's share in provident fund, including national insurance, employee pension scheme, social security and employee state insurance. Typically, these contributions are reflected in the returns, statements and challans prescribed or approved by the concerned statutory bodies for this purpose.

Coverage

The various heads of contributions are summarised in this report. The grouping of taxes under the heads of 'Direct Contributions', 'Indirect Contributions' and 'Other Contributions' is based on our understanding of the nature of taxes and its payment mechanism. Where date of actual cash inflow/outflow was not available, the tax payments shown as due in the relevant tax period has been considered for reporting.

Global Tax and other contributions

DIRECT CONTRIBUTIONS

Corporate Tax

- 1 Corporate Income Tax
- 2 Surcharge and cess
- 3 Corporate tax credit and incentives

Other Charges

- 1 Stamp duty
- 2 Property tax
- 3 Municipal Taxes
- 4 Land revenue
- 5 Gas & Electricity Duties
- 6 Waste Disposal Tax
- 7 Motor vehicle tax
- 8 Road cess
- 9 Trade License
- 10 Packaging tax/duties
- 11 Pollution Control Fees
- 12 Factory License
- 13 Welfare Cess
- 14 Apprenticeship levy

Net Indirect Taxes

- 1 Goods and Service Tax (GST)
- 2 Custom Duties (all types)
- 3 Value Added Tax (VAT)
- 4 Sales and Use Tax

INDIRECT CONTRIBUTIONS

Withholding and Payroll Taxes

- 1 Tax collected at source (TCS) for sale to customers
- 2 Withholding taxes collected from employee/Payroll taxes
- 3 Withholding taxes (WHT) collected from vendor
- 4 Withholding taxes collected from shareholder
- 5 Professional taxes
- 6 Foreign Worker Levy
- 7 Work Permit Levy

OTHER CONTRIBUTIONS

1. Provident Fund
2. Employee Pension Scheme
3. Employee State Insurance
4. Labour Welfare Fund
5. National Insurance
6. Social Security Fund
7. Compensation Funds
8. Disable Person Funds
9. Gratuity Scheme
10. Superannuation Scheme

Excluded amounts

The following are not included in the Global Tax & Other Contributions statement:

- Payment of indirect taxes on procurements paid to vendors
- Any fees paid to the government and its authorities for various kinds of compliance, filings, etc.

Currency

The currency considered for this report or the reporting currency is the Indian Rupee (₹). The data for Global Tax & Other Contributions to Government provided by any subsidiary in their local reporting currency, has been converted to ₹ based on the exchange rate that has been considered in preparation of Form AOC-01.



Entity Schedule

Tata Motors Commercial and Passenger Vehicles

Sl. No.	Name of the company	Country
1	Tata Motors Limited	India
2	Brabo Robotics And Automation Limited	India
3	Fiat India Automobiles Private Limited	India
4	PT. Tata Motors Distribusi Indonesia	Indonesia
5	PT. Tata Motors Indonesia	Indonesia
6	Tata Cummins Private Limited	India
7	TCPL Green Energy Solutions	India
8	Tata Daewoo Mobility Company Limited	South Korea
9	Tata Daewoo Mobility Sales Company Limited	South Korea
10	Tata Hispano Motors Carrocera S.A	Spain
11	Tata Hispano Motors Carroceries Maghreb S.A	Morocco
12	Tata Motors (Thailand) Limited	Thailand
13	Tata Motors Body Solutions Limited	India
14	Tata Motors Design Tech Centre plc	UK
15	Tata Motors Design Tech Centre plc (Indian PE)	India
16	Tata Motors Global Services Limited	India
17	Tata Motors Limited (Bangladesh Branch)	Bangladesh
18	Tata Motors Limited (China Representative office)	China
19	Tata Motors Limited (Dubai Liaison office)	Dubai
20	Tata Motors Limited (Kenya Branch)	Kenya
21	Tata Motors Limited (Spain Branch)	Spain
22	Tata Motors Passenger Vehicles Limited	India
23	Tata Passenger Electric Mobility Limited	India
24	Tata Precision Industries Pte. Limited	Singapore
25	TMF Business Services Limited	India
26	TMF Holdings Limited	India
27	TML CV Mobility Solutions Limited	India
28	TML Holdings Pte. Limited	Singapore
29	TML Smart City Mobility Solutions (J&K) Private Limited	India
30	TML Smart City Mobility Solutions Limited	India
31	Trilix S.r.l	Italy
32	Tata Motors Finance Limited*	India

* ceased to be subsidiary w.e.f. April 01, 2024

Jaguar Land Rover

Sl. No.	Name of the company	Country
1	Bowler Motors Limited	UK
2	Daimler Transport Vehicles Limited	UK
3	In-car Ventures Limited	UK
4	InMotion Ventures 2 Limited	UK
5	InMotion Ventures 3 Limited	UK
6	InMotion Ventures Limited	UK
7	Jaguar Cars Limited	UK
8	Jaguar Cars South Africa (Pty) Limited	South Africa
9	Jaguar e Land Rover Brasil Indústria e Comércio de Veículos LTDA	Brazil
10	Jaguar Land Rover (China) Investment Co. Limited	China
11	Jaguar Land Rover (Ningbo) Trading Co. Limited	China
12	Jaguar Land Rover (South Africa) (Pty) Limited	South Africa
13	Jaguar Land Rover (South Africa) Holdings Limited	South Africa
14	Jaguar Land Rover Australia (Pty) Limited	Australia
15	Jaguar Land Rover Austria GmbH	Austria
16	Jaguar Land Rover Automotive Plc	UK
17	Jaguar Land Rover Belux N.V.	Belgium
18	Jaguar Land Rover Canada ULC	Canada
19	Jaguar Land Rover Classic Deutschland GmbH	Germany
20	Jaguar Land Rover Classic USA LLC	USA
21	Jaguar Land Rover Colombia S.A.S	Colombia
22	Jaguar Land Rover Deutschland GmbH	Germany
23	Jaguar Land Rover Espana SL	Spain
24	Jaguar Land Rover France S.A.S	France
25	Jaguar Land Rover Holdings Limited	UK
26	Jaguar Land Rover Hungary KFT	Hungary
27	Jaguar Land Rover India Limited	India
28	Jaguar Land Rover Ireland (Services) Limited	Ireland
29	Jaguar Land Rover Italia S.p.A	Italy
30	Jaguar Land Rover Japan Limited	Japan

Jaguar Land Rover (Contd.)

Sl. No.	Name of the company	Country
31	Jaguar Land Rover Korea Company Limited	Korea, Republic Of
32	Jaguar Land Rover Limited	UK
33	Jaguar Land Rover Limited (Austria PE)	Austria
34	Jaguar Land Rover Limited (Germany PE)	Germany
35	Jaguar Land Rover México, S.A.P.I. de C.V.	Mexico
36	Jaguar Land Rover Nederland B.V.	Netherlands
37	Jaguar Land Rover North America LLC	USA
38	Jaguar Land Rover Pension Trustees Limited	UK
39	Jaguar Land Rover Portugal-Veiculos e Pecas, Lda.	Portugal
40	Jaguar Land Rover Servicios México, S.A. de C.V.	Mexico
41	Jaguar Land Rover Singapore Pte. Limited	Singapore
42	Jaguar Land Rover Slovakia s.r.o.	Slovakia
43	Jaguar Land Rover Taiwan Company Limited	Taiwan
44	Jaguar Land Rover Technology and Business Services India Private Limited	India
45	Jaguar Land Rover Ventures Limited	UK
46	Jaguar Racing Limited	UK
47	JLR Nominee Company Limited	UK
48	Land Rover Exports Limited	UK
49	Land Rover Ireland Limited	Ireland
50	The Lanchester Motor Company Limited	UK
51	S.S. Cars Limited	UK
52	Shanghai Jaguar Land Rover Automotive Services Co. Limited	China
53	The Daimler Motor Company Limited	UK
54	Limited Liability Company Jaguar Land Rover (Russia) [#]	Russia

[#] ceased to be a subsidiary w.e.f. October 31, 2024

Other business

Sl. No.	Name of the company	Country
1	Tata Technologies Ltd.	India
2	Cambric Limited	Bahamas
3	INCAT International Plc.	UK
4	Tata Manufacturing Technologies (Shanghai) Co. Ltd.	Shanghai
5	TATA Manufacturing Technologies (Shanghai) Co. Ltd. (Changning Branch)	China
6	TATA Manufacturing Technologies (Shanghai) Co. Ltd. Hefei Branch	China
7	Tata Technologies (Thailand) Ltd.	Thailand
8	Tata Technologies de Mexico, S.A. de C.V. Mexico	
9	Tata Technologies Europe Limited	UK
10	Tata Technologies Europe Limited (France Branch)	France
11	Tata Technologies Europe Limited (Germany Branch) [§]	Germany
12	Tata Technologies GmbH	Germany
13	Tata Technologies Inc.	USA
14	Tata Technologies Inc. (Canada Branch)	Canada
15	Tata Technologies Ltd. (Japan Branch)	Japan
16	Tata Technologies Nordics AB	Sweden
17	Tata Technologies Pte. Ltd.	Singapore
18	Tata Technologies Pte. Ltd. (Korea Branch)	South Korea
19	Tata Technologies SRL Romania	Romania
20	Tata Motors Insurance Broking and Advisory Services Limited	India

[§] discontinued its operations w.e.f. November 1, 2023

Independent Reasonable Assurance Report

Independent reasonable assurance report to Tata Motors Limited on Global Tax & Other Contributions

We ('KPMG Assurance and Consulting Services LLP' or 'KPMG') were engaged by the management of Tata Motors Limited ('Tata Motors' or 'the Company') to report on 'Global Tax & Other Contributions' section contained in the Company's Tax Transparency Report for the financial year 2024-25 [the said section hereinafter referred to as 'Global Tax & Other Contributions'], in the form of an independent reasonable assurance conclusion about whether Tata Motors statement that the Global Tax & Other Contributions is properly prepared, in all material respects, based on 'Basis of Preparation' attached to the Tax Transparency Report is fairly stated.

Tata Motors responsibilities

The management of Tata Motors are responsible for preparing the Global Tax & Other Contributions that is free from material misstatement in accordance with the Basis of Preparation and for the information contained therein. The management of Tata Motors is also responsible for preparing the Basis of Preparation. This responsibility includes designing, implementing and maintaining internal control relevant to the preparation and presentation of Global Tax & Other Contributions that is free from material misstatement, whether due to fraud or error. It also includes developing the Basis of Preparation. The Company is also responsible for preventing and detecting fraud and for identifying and ensuring that it complies with laws and regulations applicable to its activities.

Our responsibilities

Our responsibility is to examine the Global Tax & Other Contributions prepared by the Company and to report thereon in the form of an independent reasonable assurance conclusion based on the evidence obtained.

We conducted our engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000: Assurance Engagements Other Than Audits or Reviews of Historical Financial Information issued by the International Auditing and Assurance Standards Board. That standard requires that we plan and perform our procedures to obtain reasonable assurance about whether the Global Tax & Other Contributions is properly prepared, in all material respects. The firm applies International Standard on Quality Control 1 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. We have complied with the independence and other ethical requirements of the Code of Ethics for professional accountants issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. The procedures selected depend on our judgment, including the assessment of the risks of material misstatement of Global Tax & Other Contributions whether due to fraud or error. In making those risk assessments, we have considered internal control relevant to the preparation and presentation of Global Tax & Other Contributions in order to design assurance procedures that are appropriate in the circumstances, but not for the purposes of expressing a conclusion as to the effectiveness of the Company's internal control over the preparation and presentation of Global Tax & Other Contributions. Our engagement also included assessing the appropriateness of Global Tax & Other Contributions, the suitability of the Basis of Preparation used by the Company in preparing the Global Tax & Other Contributions in the circumstances of the engagement, evaluating the appropriateness of the procedures used in the preparation of Global Tax & Other Contributions and the

reasonableness of estimates made by the Company and evaluating the overall presentation of the Global Tax & Other Contributions. Reasonable assurance is less than absolute assurance. The procedures performed by us have been included herein as Annexure – Assurance procedures – Global Tax & Other Contributions.

Conclusion

Our conclusion has been formed on the basis of, and is subject to, the matters outlined in this report. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. In our opinion, the Global Tax & Other Contributions is properly prepared in all material respects, based on the Basis of Preparation.

Restriction of use of our report

In accordance with the terms of our engagement, this independent reasonable assurance report on Global Tax & Other Contributions has been prepared for the Company solely for inclusion in its Tax Transparency Report financial year 2024-25 and for no other purpose or in any other context. Our report should not be regarded as suitable to be used or relied on by any party wishing to acquire rights against us other than the Company for any purpose or in any context. Any party other than the Company who obtains access to our report or a copy thereof and chooses to rely on our report (or any part thereof) will do so at its own risk. To the fullest extent permitted by law, we accept or assume no responsibility and deny any liability to any party other than the Company for our work, for this independent reasonable assurance report, or for the conclusions we have reached. Our report is released to Tata Motors Limited on the basis that it shall not be copied, referred to or disclosed, in whole (save for inclusion in Tata Motors Limited's Tax Transparency Report) or in part, without our prior written consent.

For KPMG Assurance and Consulting Services LLP

Place: Mumbai
Date: May 20, 2025

Annexure - Assurance procedures - Global Tax & Other Contributions

- Understand and examine the processes and controls at Tata Motors level in managing, collating and reviewing the data for the Global Tax & Other Contributions
- Review the guidance provided/ instructions issued to locations/ units/group entities by central team for collation of various tax and other specified items
- Review the country wise break-up of the tax and other specified items reported in the Global Tax & Other Contributions
- Understand and examine the processes and controls at local country level for collation of tax and other specified items included in Global Tax & Other Contributions. This will include review of:
 - reporting to central team to ensure adherence of the guidance provided by the central team
 - processes for ensuring that all local country taxes are included within the reporting to central team
- Review the basis on which the country level tax and other specified data reported has been captured, reviewed and consolidated to assess whether the data has been collected, consolidated and reported fairly
- For the countries selected, perform trend analysis on the tax and other specified data for the reporting period to understand any material variances. Seek explanations for variances, if any
- For the countries selected, verify the tax paid (on a sample basis) to the underlying documents.
- Compare the tax and other specified data in the report to the relevant disclosures in the consolidated financial statements for the reporting period.



Glossary

Advance Pricing Agreement (APA)/Bilateral Advance Pricing Agreement (BAPA)

APA is a formal agreement that determines, in advance, the arm's length price or an appropriate set of criteria (e.g., method, comparable and appropriate adjustments thereto, critical assumptions as to future events) for the determination of the arm's length price for international transactions over a fixed period of time. This agreement can be arrived at unilaterally by a country in discussion with the company looking for such an advance resolution for its related party transactions or bilaterally (BAPA) with the two tax authorities where the subsidiaries involved in the related party transactions of the multinational conglomerate are located.

AOC-01

Form AOC-01 is prepared by the Company pursuant to Section 129(3) of the Companies Act, 2013 [Read with Rule 5 of the Companies (Accounts) Rules, 2014]. It is a statement containing salient features of the financial statements of subsidiaries / associate companies / joint ventures. The form is published in the Tata Motors Limited Integrated Annual Report.

Arm's-Length Basis/Principle

Transactions between associated/related enterprises should not be distorted by the special relationship that exists between the parties. Hence there are guidelines and principles that provides guidance on how a company can demonstrate that their transactions with related parties are not distorted by their relationship.

Associates

As per Section 2(6) of the Indian Companies Act 2013, an associate company, in relation to another company, means a company in which that other company has a significant

influence, but which is not a subsidiary company of the company having such influence.

Audit Committee (AC)

An audit committee is a sub-group of a company's board of directors responsible for the oversight of the financial reporting and disclosure process.

BEPS 1.0/ BEPS 2.0

BEPS 1.0, part of the Organisation for Economic Co-operation and Development's (OECD) Inclusive Framework on Base Erosion Profit Shifting (BEPS), aims to allocate more taxing rights to countries where multinational enterprises generate profits, regardless of physical presence. Introduced in 2015, it focuses on mitigating profit-shifting opportunities and addressing aggressive tax planning and tax evasion. The initiative targets multinationals that exploit gaps in tax rules to shift profits to low-tax jurisdictions or erode tax bases through deductible payments.

The OECD's BEPS 2.0 initiative represents a significant change in global tax standards. Its goal is to combat tax avoidance by multinational corporations and ensure that they pay taxes where they earn profits. BEPS 2.0 consists of two pillars that focus on different aspects of taxation.

Pillar 1 focuses on the redistribution of taxing rights - apart from the standardization of profit margins. Countries with large consumer markets should have the right to tax the profits of large multinationals, even if they are not physically present in those countries. This will ensure that digital and global companies are taxed fairly. However, countries have not yet been able to reach a final agreement on its introduction. This regulation mainly affects group with an annual turnover of more than EUR 20 billion and a profit margin of more than 10%.

Pillar 2 introduces a global minimum tax rate of 15%. This global minimum tax is intended to prevent multinational corporations from shifting profits to low-tax jurisdictions. This regulation mainly affects groups with an annual turnover of more than EUR 750 million.

Continuing Professional Development (CPD)

Continuing professional development (CPD) is defined as learning experiences that helps in developing and improving the professional practice of employees or resources. This can include building on the softer skill related strengths, as well as developing technical or capability gaps.

Country by Country Report (CbCR)

Under BEPS Action Plan 13, all large multinational enterprises (MNEs) are required to prepare a CbCR with aggregate data on the global allocation of income, profit, taxes paid and economic activity among tax jurisdictions in which they operate. This CbCR is shared with tax administrations in the headquarter jurisdictions by the ultimate parent or by an assigned subsidiary in its local jurisdiction. However tax authorities across jurisdictions have mutually agreed to share this report for use in high level transfer pricing and BEPS risk assessments. Tata Motors Limited is the ultimate parent entity and it files CbCR in India.

Enterprise Resource Planning (ERP)

ERP is a platform companies use to manage and integrate the essential parts of their businesses. Many ERP software applications are critical to companies because they help them implement resource planning by integrating all the processes needed to run their companies with a single system. An ERP software system can also integrate planning, purchasing inventory, sales, marketing, finance, human resources, etc.

Environmental, Social and Governance (ESG)

ESG refers to a set of standards used to measure an organization's environmental and social impact. This includes information on how a company focuses on issues like climate change, resource depletion, waste, and pollution. On the other hand the social aspect examines how it manages relationships with employees, suppliers, customers, and the communities where it operates, addressing issues like labour practices and community engagement. Lastly, governance demonstrates the company's transparency and accountability on all parameters of operation.

Government

Government refers to various government bodies in different countries to whom the contribution is made. It mainly includes Central, State, Local Authorities and government bodies constituted in respective countries.

Integrated Annual Report

Integrated reporting provides information on a company's financial and non-financial factors. Besides the standard accounting reports, It highlights how ESG issues are addressed by the company. It reveals how intellectual capital and manufactured capital interact with financial outcomes. This framework, often called the integrated reporting framework, helps investors and stakeholders understand how a company creates sustainable value.

Lower Deduction Certificate (LDC)

The Section 197 Certificate referred to in the context of the Indian Income Tax Act, 1961, often called the LDC, is a significant provision under the Income Tax Act. It enables taxpayers to benefit from a Nil or reduced Rate of Tax Deducted at Source (TDS)/WHT on their income.

Mergers & Acquisitions (M&A)

M&A refer to the processes through which companies consolidate or combine their operations. In an acquisition, one company purchases another outright, while in a merger, two firms combine to form a new legal entity. In a demerger, an undertaking is transferred on a going concern basis to the resulting company.

Related Party Transaction (RPT)

The term related-party transaction refers to a deal or arrangement made between two parties who are joined by a preexisting business relationship or common interest. Related parties who make transactions may be business affiliates, shareholder groups, or subsidiaries. Related-party transactions can include, tangible or intangible transactions, services, financial transactions etc.

Tata Code of Conduct

The Tata Code of Conduct outlines our commitment to each of our stakeholders, including the communities in which we operate, and is our guiding light when we are sometimes faced with business dilemmas that leave us at ethical crossroads.







Concept, content and design at **stirrup** | [whatsapp@stirrup.works](https://www.whatsapp.com/channel/0029va333333333333333333)

TATA MOTORS

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