

Date: 29.07.2025

Letter No. FFL/SEC/2025-26/SE-42

The Manager Listing Department National Stock Exchange of India Limited Exchange Plaza, Plot No. C/1, G Block Bandra Kurla Complex, Bandra (E), Mumbai - 400 051	The Manager Listing Department BSE Limited Phiroze Jeejeebhoy Towers Dalal Street, Mumbai - 400 001
<b>Symbol: FUSION, FUSIONPP</b>	<b>Scrip Code: 543652, 890214</b>

**Sub: Disclosure under Regulation 30(2) read with Clause 20 of Para A of Part A of Schedule III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

This is with reference to our letter no. FMFL/SEC/2024-25/SE-36 dated June 15, 2024 wherein it was, inter alia, informed that Fusion Finance Limited (formerly known as Fusion Micro Finance Limited) 'the Company', had received Order-in-original under Section 201 of Income Tax Act, 1961 dated June 14, 2024, for the Assessment Year 2020-21 and 2021-22, from the Income Tax Officer, Ward International Taxation, on account of non-deduction/lower deduction of tax on interest payment made to foreign NCD holders and the Company has treated it as "deemed to be an assessee in default".

In continuation to the above notice, we would like to inform you that the Company has received an appeal order dated 28 July 2025, under section 250 of Income Tax Act, 1961, where demand against Order-in-original has been deleted.

The relevant details as per the requirement of Regulation 30 of the Listing Regulations, read with SEBI Circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023, is enclosed in 'Annexure A' and 'Annexure B'.

We request you to take the same on record.

**For Fusion Finance Limited**  
**(Formerly Fusion Micro Finance Limited)**

**Deepak Madaan**  
**Company Secretary & Chief Compliance Officer**  
**Membership No. A24811**  
**Place: Gurugram**

**Annexure A**

Name of the Authority	Office of the Commissioner of Income Tax, Appeal, CIT(A), Delhi 23
Nature and details of the action(s) taken, or orders (s) passed	<p>The order passed under section 250 of the Income Tax Act, 1961 for AY 2020-21, deleting the demand of Rs. 16,62,03,454/- in total including interest but excluding penalty.</p> <p>(Total tax liability excluding interest- Rs. 9,54,65,663/-, Interest liability- Rs. 7,07,37,791/- )</p>
Date of receipt of direction or order including and ad-interim or interim orders or any other communication from the authority	28 July 2025
Details of the violation (s) /contravention (s) committed or alleged to be committed	<p>Earlier, the alleged order under section 201 of the Act was received pertaining to the non-deduction/lower deduction of tax on interest payment made to foreign NCD holders and the Company has been treated as “deemed to be an assessee in default”.</p> <p>It was alleged that interest payment attracts tax withholding @ 20% plus cess and surcharge u/s 196D read with section 115AD of the Act instead of tax already withheld @5% plus cess and surcharge under section 194LD of the Act.</p> <p>In respect to above order, the Company has filed appeal on July 12, 2025. The appeal has been allowed in favour of the Company, thereby deleting the demand raised under section 201 of the Act.</p>
Impact on financial, operation or other activities of the listed entity quantifiable in monetary terms to the extent possible	The Company has now received an appeal order under section 250 of Income Tax Act, 1961, where demand of Rs. 16,62,03,454/- has been deleted against the order under section 201 dated June 14, 2024.

**Annexure B**

Name of the Authority	Office of the Commissioner of Income Tax, Appeal, CIT(A), Delhi 23
Nature and details of the action(s) taken, or orders. (s) passed	The order passed under section 250 of the Income Tax Act, 1961 for AY 2021-22, deleting the demand of Rs. 11,18,43,066/- in total including interest but excluding penalty.  (Total tax liability excluding interest- Rs. 7,10,23,805/-, Interest liability- Rs. 4,08,19,261/-)
Date of receipt of direction or order including and ad-interim or interim orders or any other communication from the authority	28 July 2025
Details of the violation (s) /contravention (s) committed or alleged to be committed	Earlier, the alleged order under section 201 of the Act was received pertaining to the non-deduction/lower deduction of tax on interest payment made to foreign NCD holders and the Company has been treated as “deemed to be an assessee in default”.  It was alleged that interest payment attracts tax withholding @ 20% plus cess and surcharge u/s 196D read with section 115AD of the Act instead of tax already withheld @5% plus cess and surcharge under section 194LD of the Act.  In respect to above order, the Company has filed appeal on July 12, 2025. The appeal has been allowed in favour of the Company, thereby deleting the demand raised under section 201 of the Act.
Impact on financial, operation or other activities of the listed entity quantifiable in monetary terms to the extent possible	The Company has now received an appeal order under section 250 of Income Tax Act, 1961, where demand of Rs. 11,18,43,066/- has been deleted against the order under section 201 dated June 14, 2024.