

September 23, 2024

BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001 Company Code No.: 539807	National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051 Company Symbol: INFIBEAM
------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Sub: Intimation - Apportionment of Cost of Acquisition of Equity Shares of Infibeam Avenues Limited and Odigma Consultancy Solutions Limited pursuant to the Composite Scheme of Arrangement of Infibeam Avenues Limited ("Company"), Odigma Consultancy Solutions Limited ("Odigma" or "Resulting Company") and Infibeam Projects Management Private Limited ("IPMPL" or "Transferee Company") and their respective shareholders and creditors under section 230 to 232 of the Companies Act, 2013, and other applicable laws including the rules and regulations ("Scheme")

Dear Sir/Madam,

Please find enclosed herewith communication for the attention of Equity Shareholders of Infibeam Avenues Limited in relation to apportionment of the cost of acquisition of shares of Infibeam Avenues Limited and Odigma Consultancy Solutions Limited as per the provisions of the Income Tax Act, 1961.

You are requested to kindly take the same on your records.

Thanking you,

Yours faithfully,

For, Infibeam Avenues Limited

Shyamal Trivedi
Sr. Vice President & Company Secretary

Encl.: As above

INFIBEAM AVENUES LIMITED

Regd. Office: 28th Floor, GIFT Two Building, Block No. 56, Road-5C, Zone-5, GIFT CITY, Gandhinagar,
Taluka & District - Gandhinagar – 382 355, **CIN: L64203GJ2010PLC061366**

Tel: +91 79 67772204 | **Fax:** +91 79 67772205 | **Email:** ir@ia.ooo | **Website:** www.ia.ooo

FOR THE ATTENTION OF THE EQUITY SHAREHOLDERS OF INFIBEAM AVENUES LIMITED

The Hon'ble National Company Law Tribunal, Ahmedabad Bench has, vide its order dated August 29, 2024 read with Corrigendum to Order passed on September 13, 2024, sanctioned the Composite Scheme of Arrangement amongst Infibeam Avenues Limited (“Demerged Company” / “Transferee Company” / “the Company”), Odigma Consultancy Solutions Limited (“Odigma” or “Resulting Company”) and Infibeam Projects Management Private Limited (“IPMPL” or “Transferee Company”) and their respective shareholders and creditors under section 230 to 232 of the Companies Act, 2013, and other applicable laws including the rules and regulations (“Scheme”).

1. Pursuant to the said Order, upon the Scheme becoming effective, in consideration of the transfer and vesting of the Global Top Level Domain Undertaking (“Demerged Undertaking”) of the Demerged Company to the Resulting Company, the Resulting Company shall, without any further application, act, instrument or deed, issue and allot to all the equity shareholders of the Demerged Company, whose names appear in the register of members as on the Record Date, i.e. September 11, 2024, 1 (One) Equity Share of the Resulting Company of face value of INR 1/- each fully paid-up for every 89 (Eighty-nine) Equity Shares held in the Demerged Company of face value of INR 1/- each fully paid-up. Accordingly, on September 18, 2024, the Resulting Company allotted 3,12,58,450 Equity Shares and the same is in the process of listing with the National Stock Exchange of India Limited and the BSE Limited.
2. The Appointed Date of the Scheme is the Effective Date, i.e., April 1, 2023. Accordingly, with effect from the Appointed Date, the entire Demerged Undertaking of Infibeam Avenues Limited has been transferred and vested into Odigma Consultancy Solutions Limited.
3. We wish to inform the Shareholders the proportion in which the cost of acquisition of the Equity Share(s) shall be split between Demerged Company and Resulting Company for the purpose of computing the capital gain/loss as per the provisions of Sections 49(2C) and 49(2D) of the Income-tax Act, 1961 (“**IT Act**”). Accordingly, the cost of acquisition of Equity Shares of both the Demerged Company and the Resulting Company is to be calculated as under:
 - (a) the cost of acquisition of the Equity Shares issued pursuant to the Scheme by Odigma Consultancy Solutions Limited, as per Section 49(2C) of the IT Act, shall be the amount which bears to the cost of acquisition of shares of Infibeam Avenues Limited, the same proportion as the net book value of the assets transferred in the demerger bears to the net worth of the Demerged Company immediately before the demerger.
 - (b) the cost of acquisition of the original shares of Infibeam Avenues Limited held by a shareholder, as per Section 49(2D) of the IT Act, shall be deemed to have been reduced by the cost of acquisition of shares of Resulting Company as referred to in sub-paragraph (a) above.
4. The proportion referred to in paragraph 4 for the purposes of the IT Act, is as under:

Name of Company	Percentage of Cost of Acquisition of equity shares in Demerged Company and Resulting Company
Infibeam Avenues Limited (Demerged Company)	99.93%
Odigma Consultancy Solutions Limited (Resulting Company)	0.07%
Total	100%

Kindly note that this communication (in relation with computation of cost of acquisition) is meant only for the purpose of providing general guidance to the shareholders of Infibeam Avenues Limited based on Company's understanding and hence, this should not be considered as a substitute for any independent opinion that the shareholder may obtain. Shareholders are advised to consult their own consultants to understand specific tax implications, in their respective cases. Infibeam Avenues takes no express or implied liability in relation to this guidance.

INFIBEAM AVENUES LIMITED

Regd. Office: 28th Floor, GIFT Two Building, Block No. 56, Road-5C, Zone-5, GIFT CITY, Gandhinagar, Taluka & District - Gandhinagar – 382 355, **CIN: L64203GJ2010PLC061366**

Tel: +91 79 67772204 | **Fax:** +91 79 67772205 | **Email:** ir@ia.ooo | **Website:** www.ia.ooo