

**STATEMENT OF SPECIAL TAX BENEFITS**

To,

**The Board of Directors**

Bluestone Jewellery and Lifestyle Limited  
Site No. 89/2, Lava Kusha Arcade  
Situated at Munnekolal Village  
Outer Ring Road, Marathahalli, 4th Phase  
JP Nagar, Bangalore - 560 037  
Karnataka, India

**Sub: Statement of possible special tax benefits available to Bluestone Jewellery and Lifestyle Limited (formerly known as Bluestone Jewellery and Lifestyle Private Limited) and its shareholders, prepared in accordance with the requirements under Schedule VI (Part A)(9)(L) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended ("SEBI ICDR Regulations")**

1. We, M S K A & Associates ("the Firm"), Chartered Accountants, the statutory auditors of Bluestone Jewellery and Lifestyle Limited (the "Company") hereby confirm the enclosed statement in the Annexure prepared and issued by the Company, which provides the possible special tax benefits under Income-tax Act, 1961 ('Act') presently in force in India viz. the Income-tax Act, 1961, ('Act'), the Income-tax Rules, 1962, ('Rules'), regulations, circulars and notifications issued thereon, as applicable to the assessment year 2025-26 relevant to the financial year 2024-25, available to the Company and its shareholders. Further, there is no material subsidiary of the Company as per the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended. Several of these benefits are dependent on the Company and its shareholders, as the case may be, fulfilling the conditions prescribed under the relevant provisions of the Act. Hence, the ability of the Company, its shareholders to derive the special tax benefits is dependent upon their fulfilling such conditions, which based on business imperatives the Company and its shareholders face in the future, the Company, its shareholders may or may not choose to fulfil.
2. This statement of possible special tax benefits is required as per Schedule VI (Part A)(9)(L) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended ('SEBI ICDR Regulations'). While the term 'special tax benefits' has not been defined under the SEBI ICDR Regulations, it is assumed that with respect to special tax benefits available to the Company, the same would include those benefits as enumerated in the statement. Any benefits under the Taxation Laws other than those specified in the statement are considered to be general tax benefits and therefore not covered within the ambit of this statement. Further, any benefits available under any other laws within or outside India, except for those specifically mentioned in the statement, have not been examined and covered by this statement.
3. Our views are based on the existing provisions of law and its interpretation, which are subject to change from time to time. We do not assume responsibility to update the views consequent to such changes.
4. The benefits discussed in the enclosed statement cover the possible special tax benefits available to the Company and its shareholders and do not cover any general tax benefits available to them.
5. In respect of non-residents, the tax rates and the consequent taxation shall be further subject to any benefits available under the applicable Double Taxation Avoidance Agreement, if any, between India and the country in which the non-resident has fiscal domicile.

6. The benefits stated in the enclosed statement are not exhaustive and the preparation of the contents stated is the responsibility of the Company's management. We are informed that this statement is only intended to provide general information to the investors and is neither designed nor intended to be a substitute for professional tax advice. In view of the distinct nature of the tax consequences and the changing tax laws, each investor is advised to consult their own tax consultant with respect to the specific tax implications arising out of their participation in the issue and we shall in no way be liable or responsible to any shareholder or subscriber for placing reliance upon the contents of this statement. Also, any tax information included in this written communication was not intended or written to be used, and it cannot be used by the Company or the investor, for the purpose of avoiding any penalties that may be imposed by any regulatory, governmental taxing authority or agency.
7. We do not express any opinion or provide any assurance whether:
  - The Company and its shareholders will continue to obtain these benefits in future;
  - The conditions prescribed for availing the benefits have been/would be met;
  - The revenue authorities/courts will concur with the views expressed herein.
8. The contents of the enclosed statement are based on information, explanations and representations obtained from the Company and on the basis of our understanding of the business activities and operations of the Company. We have relied upon the information and documents of the Company being true, correct, and complete and have not audited or tested them. Our view, under no circumstances, is to be considered as an audit opinion under any regulation or law. No assurance is given that the revenue authorities/ courts will concur with the views expressed herein. Our Firm or any of partners or affiliates, shall not be responsible for any loss, penalties, surcharges, interest or additional tax or any tax or non-tax, monetary or non-monetary, effects or liabilities (consequential, indirect, punitive or incidental) before any authority / otherwise within or outside India arising from the supply of incorrect or incomplete information of the Company.
9. This Statement is addressed to Board of Directors and issued at specific request of the Company. The enclosed Annexure to this Statement is intended solely for your information and for inclusion in the draft red herring prospectus, red herring prospectus, the prospectus and any other material in connection with the proposed initial public offering of equity shares of the Company, and is not to be used, referred to or distributed for any other purpose without our prior written consent. Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this certificate is shown or into whose hands it may come without our prior consent in writing. Any subsequent amendment / modification to provisions of the applicable laws may have an impact on the views contained in our statement. While reasonable care has been taken in the preparation of this certificate, we accept no responsibility for any errors or omissions therein or for any loss sustained by any person who relies on it.

For **M S K A & Associates**  
**Chartered Accountants**  
**Firm Registration Number: 105047W**

Ankush Ashok Agrawal  
Digitally signed by  
Ankush Ashok Agrawal  
Date: 2025.07.17  
20:36:13 +05'30'

**Ankush Agrawal**  
**Partner**  
**Membership No: 159694**

**Place: Mumbai**  
**Date: July 17, 2025**

**UDIN: 25159694BMLWHI5450**  
**Encl: Annexure 1 & 2**



## ANNEXURE-1

### STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO BLUESTONE JEWELLERY AND LIFESTYLE LIMITED (FORMERLY KNOWN AS BLUESTONE JEWELLERY AND LIFESTYLE LIMITED) (THE "COMPANY") AND ITS SHAREHOLDERS UNDER THE INCOME TAX ACT, 1961

This statement of possible special income tax benefits is required as per Schedule VI (Part A)(9)(L) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended ('SEBI ICDR Regulations'). While the term 'special tax benefits' has not been defined under the SEBI ICDR Regulations, for the purpose of this statement, it is assumed that with respect to special tax benefits available to the Company, the same would include those benefits available as enumerated below:

Under the Income-tax Act, 1961 (hereinafter referred to as 'the Act'), as per Finance Act, 2025, applicable for Financial Year 2025-26 relevant to Assessment Year 2026-27 ('Year').

This Annexure sets out only the possible special tax benefits available to Bluestone Jewellery and Lifestyle Limited and its shareholders under the current provisions of the Act, as amended by the Finance Act, 2025, applicable for the Financial Year 2025-26, relevant to Assessment Year 2026-27, presently in force in India.

This Annexure covers only certain relevant income tax law benefits and does not cover comprehensive benefits of the Act or any indirect tax law benefits or benefits under any other law.

#### 1. Special Tax Benefits available to the Company

##### A. Deduction in respect of employment of new employees:

In accordance with and subject to the conditions specified under Section 80JJAA of the Act, a company is entitled to a deduction of an amount equal to 30% of additional employee cost incurred in the course of business in a financial year, for 3 consecutive assessment years including the assessment year relevant to the financial year in which such additional employment cost is incurred.

Additional employee cost means the total emoluments paid or payable to additional employees employed in the financial year. The deduction under Section 80JJAA would continue to be available to the company even where the company opts for the lower effective tax rate of 25.168% as per the provisions of Section 115BAA of the Act (as discussed above).

The company should be eligible to claim this deduction in case it incurs additional employee cost within the meaning of Explanation (i) to sub-Section (2) of Section 80JJAA of the Act and satisfies the conditions as mentioned in the said Section.

## BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekola Village, Outer Ring Road, Marathahalli, Bangalore - 560037 statutorycompliance@bluestone.com

www.bluestone.com CIN: U72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904



## **B. Lower corporate tax rate under section 115BAA of the Act**

Section 115BAA has been inserted in the Act w.e.f. 1 April 2020 (A.Y. 2020-21). Section 115BAA of the Act grants an option to a domestic company to be governed by the section from a particular assessment year. If a company opts for section 115BAA of the Act, it can pay corporate tax at a reduced rate of 25.168% (22% plus surcharge of 10% and education cess of 4%). Section 115BAA of the Act further provides that domestic companies availing the said option will not be required to pay Minimum Alternate Tax ('MAT') on their 'book profits' under section 115JB of the Act.

However, such a company will no longer be eligible to avail specified exemptions /incentives/deductions under the Act and will also need to comply with the other conditions specified in section 115BAA of the Act. Further, it shall not be allowed to claim set-off of any brought forward loss arising to it on account of additional depreciation and other specified incentives.

Company has opted to apply section 115BAA of the Act for Financial Year 2024-25.

## **C. Deduction under section 80M of the Act**

As per the provisions of section 80M of the Act, dividend received by the Company from any other domestic Company or a foreign company shall be eligible for deduction while computing its total income for the relevant year. The amount of such deduction would be restricted to the amount of dividend distributed by the Company to its Shareholders on or before one month prior to due date of filing of its Income-Tax return for the relevant year. Since the Company has investments in domestic companies, it may avail the above-mentioned benefit subject to fulfilment of conditions specified under section 80M of the Act.

## **2. Special Tax benefits available to the shareholders**

There are no special direct tax benefits available to the shareholders of the Company. However, such shareholders shall be liable to tax at concessional tax rates on certain incomes (arising from sale of equity shares of the company) under the extant provisions of the Act.

- Section 112A of the Act provides for concessional rate of tax at the rate of 12.5% in respect of specified long-term capital gains [gain exceeding Rs.1,25,000 arising from the transfer of a long-term capital asset (i.e., capital asset held for the period of 12 months or more)] being an equity share in an Indian company or a unit of an equity-oriented fund wherein Securities Transaction Tax ('STT') is paid on both acquisition and transfer with effect from July 23, 2024.
- Section 111A of the Act provides for concessional rate of tax @ 20% in respect of short-term capital gains (provided the short-term capital gains exceeding the basic threshold limit of exemption, where applicable) arising from the transfer of a short-term capital asset (i.e. capital asset held for the period of less than 12 months) being an equity share in a company or a unit of an equity-oriented fund wherein STT is paid on transfer with

# BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekola Village, Outer Ring Road, Marathahalli, Bangalore - 560037 statutorycompliance@bluestone.com

www.bluestone.com CIN: U72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904



effect from July 23, 2024.

- Dividend income earned by the shareholders would be taxable in their hands at the applicable rates. Furthermore, in the case of shareholders who are individuals, Hindu Undivided Family, Association of Persons, Body of individuals, whether incorporated or not and every artificial judicial person, surcharge would be restricted to 15% irrespective of the amount of dividend.
- In respect of non-residents, the tax rates and the consequent taxation shall be further subject to any benefits available under the applicable Double Taxation Avoidance Agreement, if any, between India and the country in which the non-resident shareholder has fiscal domicile.

**Notes:**

1. This Annexure sets out only the special tax benefits available to the Company and its shareholders under the Act as amended by the Finance Act 2025 applicable for the Financial Year 2025-26 relevant to the Assessment Year 2026-27, presently in force in India.
2. This Annexure covers only benefits available as per provisions of Income Tax Act, 1961 and no implication have been analysed as per proposed Income Tax Bill, 2025.
3. This Annexure covers only certain relevant direct tax law benefits and does not cover any indirect tax law benefits or benefit under any other law.
4. Several of these benefits are dependent on the Company or its shareholders fulfilling the conditions prescribed under the relevant tax laws.
5. The Company has opted to be governed by the provision of Section 115BAA of the IT Act for the year under consideration. The Company is fully aware that since option for concessional income tax rate as prescribed under Section 115BAA of the Act is opted, it will not be allowed to claim any of the following deductions/ exemptions:
  - i. Section 10AA: Tax holiday available to units in a Special Economic Zone.
  - ii. Section 32(1) (iia): Additional depreciation.
  - iii. Section 32AD: Investment allowance.
  - iv. Section 33AB/33ABA: Tea coffee rubber development expenses/site restoration expenses
  - v. sub-clause (ii) or sub-clause (iia) or sub-clause (iii) of sub-section (1) or sub-section (2AA) or sub-section (2AB) of Section 35: Expenditure on scientific research.
  - vi. Section 35AD: Deduction for capital expenditure incurred on specified businesses.
  - vii. Section 35CCC/35CCD: expenditure on agricultural extension /skill development.
  - viii. Deduction under any provisions of Chapter VI-A except for the provisions of section 80JJAA or section 80M.
  - ix. Without set-off of any loss carried forward or depreciation from any earlier assessment year, if such loss or depreciation is attributable to any of the deductions referred from clause i) to viii) above.

## BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekola Village, Outer Ring Road, Marathahalli, Bangalore - 560037 statutorycompliance@bluestone.com

www.bluestone.com

CIN: U72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904



- x. No set off of any loss or allowance for unabsorbed depreciation deemed so under section 72A, if such loss or depreciation is attributable to any of the deductions referred from clause i) to viii) above
6. Further, it was clarified by the Central Board of Direct Taxes vide Circular No. 29/ 2019 dated October 2, 2019, and under section 115JB(5A) that if the Company opts for concessional income tax rate under section 115BAA of the Act, the provisions of Minimum Alternate Tax ('MAT') under section 115JB of the Act shall not be applicable. Further, any carried forward MAT credit also cannot be claimed.
7. The Company confirms that no loss or unabsorbed depreciation is attributable to any of the deductions not permissible under section 115BAA(2) of the Income Tax Act, 1961.
8. The Company confirms that they have filed Form 10-IC as required under section 15BAA of the Income Tax Act, 1961 in a timely manner.
9. This Annexure is intended only to provide general information to the investors and is neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of tax consequences, each investor is advised to consult his/her own tax advisor with respect to specific tax arising out of their participation in the Proposed IPO.
10. This statement does not discuss any tax consequences in any country outside India of an investment in the shares of the Company. The shareholders/investors in any country outside India are advised to consult their own professional advisors regarding possible tax consequences that apply to them under the laws of such jurisdiction.
11. The views expressed in this annexure are based on the facts and assumptions as indicated in the annexure. No assurance is provided that the revenue authorities/courts will concur with the views expressed herein. The views are based on the existing provisions of law and its interpretation, which are subject to changes from time to time.
12. The Company confirms that they have not received any adverse tax order or notice or opinion (in writing or oral) for denying or not being eligible for the special tax benefits as mentioned above. Further, the company has complied with all the conditions which are necessary for the purpose of claiming these special tax benefits.

For BlueStone Jewellery and Lifestyle Limited

Rumit  
Dugar

Digitally signed by  
Rumit Dugar  
Date: 2025.07.17  
20:26:39 +05'30'

Rumit Dugar

Chief Financial Officer  
Place: Mumbai  
Date: July 17, 2025

**BLUESTONE**

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekola Village, Outer Ring Road, Marathahalli, Bangalore - 560037 statutorycompliance@bluestone.com

www.bluestone.com

CIN: U72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904





## ANNEXURE-2

### STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO BLUESTONE JEWELLERY AND LIFESTYLE LIMITED (FORMERLY KNOWN AS BLUESTONE JEWELLERY AND LIFESTYLE PRIVATE LIMITED) (THE "COMPANY") AND ITS SHAREHOLDERS UNDER INDIRECT TAX LAWS AS MENTIONED BELOW

Outlined below are the special tax benefits available to the Company, and its Shareholders under the Central Goods and Services Tax Act, 2017, the Integrated Goods and Services Tax Act, 2017, the Union Territory Goods and Services Tax Act, 2017, and respective State Goods and Services Tax Act, 2017, as amended from time to time, the Customs Act, 1962 ("Customs Act") and the Customs Tariff Act, 1975 ("Tariff Act"), as amended by the Finance Act, 2024 applicable for the Financial Year 2024-25, presently in force in India (collectively referred to as "Indirect Tax Laws"). This statement is required as per paragraph (9)(L) of Part A of Schedule VI of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended ("SEBI ICDR Regulations").

#### A) TO THE COMPANY

Based on the information provided by the management, we hereby state that no special tax benefits are available to the Company under the Indirect Tax Laws.

#### B) TO THE SHAREHOLDERS

Based on the information provided by the management, we hereby state that no special tax benefits are available to the Shareholders of the Company under the Indirect Tax Laws.

#### Notes:

1. This Annexure sets out the only the special tax benefits available to the Company and its Shareholders under the Central Goods and Services Tax Act, 2017, the Integrated Goods and Services Tax Act, 2017 and the applicable State / Union Territory Goods and Services Tax Act, 2017, and relevant rules made thereunder ("GST Acts"), as amended from time to time, the Customs Act, 1962 ("Customs Act") and the Customs Tariff Act, 1975 ("Tariff Act"), as amended by the Finance Act, 2024 applicable for the Financial Year 2024-25, presently in force in India.
2. Our comments are based on specific activities carried out by the Company. Any variation in the understanding could require our comments to be suitably modified.
3. Based on the information provided to us, we understand that the Company has not claimed any exemption or benefits or incentives under the indirect tax laws;
4. This Annexure is intended only to provide general information to the investors and is neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of tax consequences, the changing tax laws, each investor is advised to consult his/her own tax advisor with respect to specific tax implications arising out of their participation in the Proposed IPO.

## BLUESTONE

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekolal Village, Outer Ring Road, Marathahalli, Bangalore - 560037 statutorycompliance@bluestone.com

www.bluestone.com CIN: U72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904



5. This annexure covers only indirect tax laws benefits and does not cover any income tax law benefits or benefit under any other law.
6. These comments are based upon the provisions of the specified Indirect Tax Laws, and judicial interpretation thereof prevailing in the country, applicable for the Financial Year 2024-25, presently in force in India.
7. No assurance is given that the revenue authorities/courts will concur with the views expressed herein. Our views are based on the existing provisions of law and its interpretation, which are subject to changes from time to time. We do not assume responsibility to update the views consequent to such changes.

For BlueStone Jewellery and Lifestyle Limited

Rumit  
Dugar

Rumit Dugar

Digitally signed by  
Rumit Dugar  
Date: 2025.07.17  
20:28:12 +05'30'

Chief Financial Officer  
Place: Mumbai  
Date: July 17, 2025

**BLUESTONE**

BlueStone Jewellery and Lifestyle Limited

[Formerly Known as BlueStone Jewellery and Lifestyle Private Limited]

Reg. off: Site No. 89/2 Lava Kusha Arcade, Munnekola Village, Outer Ring Road, Marathahalli, Bangalore - 560037 statutorycompliance@bluestone.com

www.bluestone.com

CIN: U72900KA2011PLC059678

Corporate off: 302, Dhantak Plaza, Makwana Road, Marol, Andheri East, Mumbai - 400 059, Maharashtra.

Contact No: 080 4514 6904