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SERIAL NO. / 2023
[Signature]
NOTARY
DATE : 04/04/2023

IBEFOR THE HON'BLE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH AT PUNE

ORIGINAL APPLICATION NO. 101 OF 2019 (WZ)

IN THE MATTER BETWEEN:

MR. SAYYED MOHAMMED SABIR USMAN

& ANR.

...APPLICANTS

VERSUS

UNION OF INDIA, THROUGH SECRETARY

MINISTRY OF ENVIRONMENT, FOREST AND

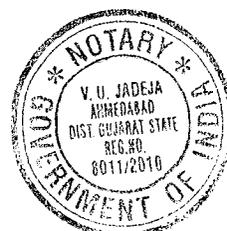
CLIMATE CONTROL & ORS.

...RESPONDENTS

**AFFIDAVIT IN REPLY ON BEHALF OF RESPONDENT NO. 24 - TATA
CHEMICALS LTD.**

I Pareshkumar Tank, s/o Chunilal Tank, age 56, having office at GIFTCITY Gandhinagar and resident of Ahmedabad, Gujarat state and affirm as under:

1. That I am the authorized signatory of Respondent No. 24, TATA Chemicals Limited (“**Answering Respondent**”), a company incorporated under the provisions of the Indian Companies Act, 1913. That I am aware and conversant with the facts of the present case and the circumstances leading to the filling of the captioned Original Application (“**Application**”). That I have read the present Application filed by the Applicants herein and I am competent and authorized to depose what is stated hereunder.
2. At the outset, I deny each and every averment, allegation, submission and contention raised by the Applicants in the Application qua the Answering Respondent, and nothing

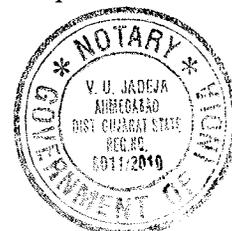


may be deemed to be admitted on part of the Answering Respondent, save and except what is specifically admitted herein below.

3. I state and submit that the Applicants have preferred the Application under Section 14,15, 18 and 20 of the NGT Act, 2010, and have made various allegations against alleged illegal mining activities undertaken in State of Gujarat, in violation of notifications/circulars issued under various environmental laws. The Applicants have arrayed various government officials/authorities (“**Respondent Nos. 1 to 13**”) who are alleged to be acting in connivance with several mining lease holders undertaking illegal mining of limestone (“**Respondent No. 25 to 64**”). It is further alleged that the said illegal mining activities are causing severe irreparable damage to the environment and ecology.
4. It has been erroneously alleged by the Applicants that the Respondent Nos. 14 to 24, which includes the Answering Respondent, are promoting and encouraging such illegal mining activities by purchasing limestone, which are illegally mined by the mining lessees in violation of the environmental laws. In the Application, the Applicants has inter *alia* sought the following relief from this Hon’ble Tribunal qua Respondent Nos. 14 to 24:

“...D. Direct the Respondent No. 14 to 24 – Project Proponents to deposit exemplary and deterrent special environmental damages for promoting and encouraging illegal mining activities causing substantial and irreparable damage to environment and ecology...

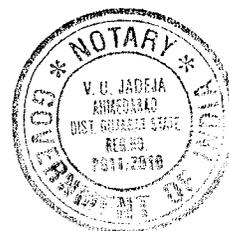
E. Direct Respondent No. 1 to 13 to initiate appropriate legal proceedings including prosecution against the Respondent No. 14 to 64 for violation of the provisions of EIA Notilication-2006 and other applicable pollution control laws.”



5. I state and submit that the Applicants are not entitled to any of the reliefs prayed for, including any direct or indirect relief against the Answering Respondent, since no evidence of any wrongdoing has been pleaded specifically in the Application. The Application is an abuse of the process of law and therefore is liable to be dismissed *in limine*.

BACKGROUND OF THE ANSWERING RESPONDENT

6. The Answering Respondent is a reputed public listed company, incorporated under the provisions of the Indian Companies Act, 1913. The Answering Respondent is a leading manufacturer of various products such as soda ash, sodium bicarbonate, salt, cement etc. (“**Products**”) The plant of the Answering Respondent is situated at Mithapur, District Devbhoomi Dwarka, Gujarat (“**Plant**”). The Answering Respondent operates through two verticals - Basic Chemistry and Specialty Chemistry. The Basic Chemistry vertical of the Answering Respondent provides key ingredients to many of the world's leading industries including glass, detergents, pharma, biscuit manufacturing, bakeries and other industries. The Specialty Chemistry vertical deals with the business of, inter alia, agro science, nutritional science, production of Fossence and Gossence, a range of healthy prebiotic products that are supplied globally.
7. It is submitted that the Answering Respondent is not in violation of any of the environmental laws. The Answering Respondent uses limestone in its Plant for manufacturing activities of the Products as aforesaid. However, the Answering Respondent neither indulges in illegal mining of limestone nor does it obtain limestone through mining lessees involved in illegal and unauthorized mining activities causing environmental damage. On the contrary, the Answering Respondent has always strived for creating a better environment and helped the local communities in its vicinity.

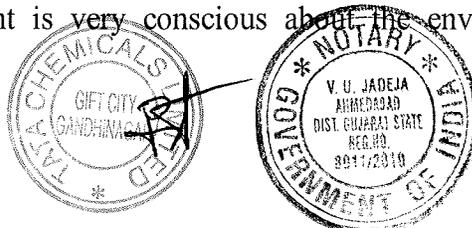


8. Further, the Answering Respondent is committed to the betterment of the society at large. It is running an organization namely 'Tata Chemical Society for Rural Development' (TCSRDR) which has been functioning for last 30 years with the financial support and resources of the Answering Respondent for infrastructure related works such as construction of a room of a primary school, cattle shed for stay of cattle/good, C.C. Road, repairing of a public well etc. The Answering Respondent has also spent substantial amount, time and resources for the welfare and health care of residents by providing amenities such as hand pump, RCC, a broad diameter pipeline in compare to existing one, which has been replaced for permanent drinking water, which can be used for goods-cattle etc.
9. The Applicants are merely creating an illusion before this Hon'ble Tribunal by alleging that the Answering Respondent is in violation of existing notifications passed by the State under the Environmental Protection Act, 1986, and asserting that it is promoting the activities of the illegal mining activities carried out by Respondent Nos. 25 to 64 without establishing or placing on record any material proof.
10. It is submitted that the Answering Respondent has a long-standing goodwill, and it does not violate any environmental policies, which are in place and are for betterment of the eco-system. Before advertng to the para-wise reply to the present Application, the Answering Respondent is raising the following Preliminary Submissions/Objections to the Application:

PRELIMINARY SUBMISSIONS/OBJECTIONS TO THE APPLCIATION

The Answering Respondent is compliant with all the environmental laws.

11. The Plant of the Answering Respondent was established in 1939 for production of the Products, which are of great importance to many industries as well as to the consumers at large. The Answering Respondent is very conscious about the environmental

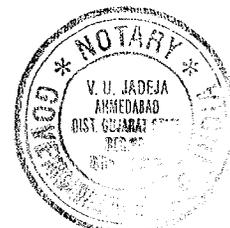


protection and even has an established Environmental Management System, which is certified to ISO 14001 and even operates a laboratory for environmental monitoring. The Answering Respondent has also installed air pollution control devices to monitor the emission norms, which meet prescribed limits of parameters by the regulatory authorities.

12. The Answering Respondent has periodically renewed all the applicable permits and environmental clearances in compliance of all the prevailing laws or notifications issued from time to time under the Environmental Protection Act, 1986. The Plant is operating at the very same geographical location since last eight decades i.e., Mithapur, District Devbhoomi Dwarka, Gujarat. It is pertinent to state that the Answering Respondent is a law-abiding company and is conscious of the obligations towards the environment laws. The methodology adopted by the Answering Respondent while manufacturing its Products at the Plant is in compliance with environmental laws.

No specific allegation against the Answering Respondent

13. The Applicants have failed to raise any specific allegation against the Answering Respondent, which can show that the Answering Respondent is in contravention of any prevailing environmental laws. The allegations levelled against the Answering Respondent are merely speculative in nature without appreciating the applicable law and correct facts.
14. The present Application is baseless, and Answering Respondent is not even a necessary party to the same. The jurisprudence of environmental law in India is based on the "Polluter Pays" principle. The Applicants in the prayer clause produced at Para 22(D) of the Application have sought damages for promoting and encouraging illegal mining against Respondent Nos. 14 to 24, including the Answering Respondent. However, the Applicants have failed to highlight any relationship between the Answering



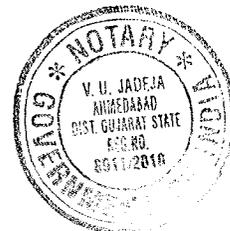
Respondent and entities allegedly engaged in illegal mining to establish any wrongdoing on the part of the Answering Respondent. The claims in this Application are imaginary and unsubstantiated.

15. Thus, in absence of any specific allegation pleaded by the Applicants against the Answering Respondent, no reliefs can be given qua the Answering Respondent. Accordingly, the Application deserves to be dismissed qua Respondent No. 24.

Answering Respondent is not extending help to anyone in violating CRZ Notifications issued by Central Government.

16. The Applicants have made bald allegations with respect to role of and Respondent Nos. 1 to 24, including the Answering Respondent, in the alleged violation of CRZ Notification of 1991 and 2011 by Respondent Nos. 25 to 64. Such allegations in itself are baseless and devoid of any merits. The Applicants have not pointed out a single fact to establish the manner and form in which the alleged violation of CRZ Notification of 1991 and 2011 has taken place with the help of Respondent Nos. 1 to 24, including the Answering Respondent.

17. The CRZ Notification of 2011 has replaced the CRZ Notification 1991. As per the CRZ Notification of 2011 (Annexure A-6 of Application) the Central Government has declared certain coastal stretches as CRZ with an intention to conserve and protect the coastal stretches and at the same time to promote development through sustainable manner. In the CRZ Notification 2011 there are certain activities which are declared as prohibited activities. The Applicants have specifically alleged that Respondent No. 25 to 64 have been carrying out illegal mining in the classified CRZ zone being CRZ-I and CRZ-II.



18. The Answering Respondent is not supporting or helping any of the Respondents which are prohibited in terms of the CRZ Notification 2011. The Answering Respondent has not assisted the Respondent Nos. 25 to 64 in alleged violation of the provisions under CRZ Notification 2011. The allegations are merely speculative in nature and untrue.

Answering Respondent is not in default of Notifications dated 31 May 2012.

19. The Applicants have alleged violation of Eco-Sensitive Zone and Protection of Girnar Reserve Forest as prescribed in the Notification dated 31 May 2012 (“**Notification 2012**”). Under the Notification 2012, the boundary of Girnar Eco-Sensitive Zone has been defined (Annexure A-8 of Application). The radius of the Eco-Sensitive Zone is 0-5 kms and the total peripheral area is about 9317.58 hectare. The Applicants’ contention that the Answering Respondent is within the 5 kms periphery of the Eco-Sensitive Zone is false and baseless. This is because neither the Plant nor any other office and/or related premises of the Answering Respondent is/are within the periphery of the Eco-Sensitive Zone.

20. Further, Annexure-III of the Notification 2012 provides for the activities which are prohibited in the Eco-Sensitive Zone around Girnar Forest and no such activities, directly or indirectly, are carried out by the Answering Respondent. It is reiterated that the Answering Respondent is in compliance of the local applicable permits and environmental clearance for operating and functioning of the Plant.

21. The fact that the Answering Respondent does not operate its Plant within the Eco-Sensitive Zone and within the 5 km radius from the periphery of the Eco-Sensitive Zone, clearly demonstrates that the allegations levelled by the Applicants are frivolous and have been made without any evidence. The operations of the Plant are not in contravention of the Notification 2012, as applicable to the Answering Respondent.

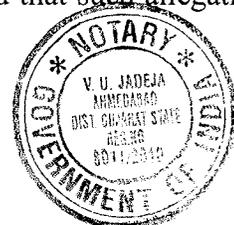


Answering Respondent is not in default of Notifications dated 22 August 2013 issued by Central Government.

22. Under the Notification dated 22 August 2013 passed by Ministry of Environment and Forest certain area around Marine Park and Marine Sanctuary has been identified as the Eco-sensitive zone (“**Notification 2013**”). Under this Notification 2013, the boundaries of Eco-sensitive zone have been defined to include various areas (Annexure A-9 of the Application). Annexure-A of Notification 2013 provides for the boundary description of the Eco-sensitive zone and Annexure-B of Notification 2013 describes the coordinates of its boundary. It is submitted that the Plant of the Answering Respondent does not fall within such Eco-sensitive zone defined and demarcated under the Notification 2013. The Applicants, erroneously and without any evidence, have made general allegation against the Answering Respondent that it operates its Plant in the Eco-sensitive zone. The Answering Respondent does not carry out any activity, which is prohibited under the Notification 2013. The Answering Respondent has been carrying out its business activities since many years in compliance of all the applicable permits and permissions as required under law from time to time. Thus, any allegation to the contrary is misplaced and cannot be sustained. More particularly, when the Applicants have failed to substantiate the same with any evidence, documentary or otherwise.

Answering Respondent is not in default of Notifications dated 25 October 2016 issued by the Central Government.

23. The Applicants have also contended that Answering Respondent is running its operations in the area situated in Gir Somnath, which is declared and demarcated as an Eco-sensitive Zone vide Notification dated 25 October 2016 issued by Ministry of Environment, Forest and Climate Control, Government of India for protection of Gir National Park, Gir Wildlife Sanctuary, Paniya Wildlife Sanctuary and Mitiyala Wildlife Sanctuary (“**Gir Protected Area**”). It is submitted that such allegations are



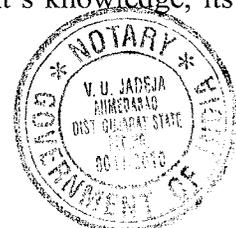
completely false and devoid of merits. It is stated that the Applicants have not placed on record any documentary evidence to show that Answering Respondent is running its operations illegally in the Gir Protected Area. It is stated that Answering Respondent is not carrying out any operations in the area covered by the Notification dated 25 October 2016.

24. Thus, the Answering Respondent is not in violation of any of the Notifications issued under the prevailing environmental laws and has not play any part in the alleged illegal mining of limestone. The Application fails to bring out any cause of action against the Answering Respondent. Accordingly, the same deserves to be dismissed qua the Answering Respondent.

Answering Respondent does not promote or encourage illegal mining causing harm to the environment.

25. The Applicant's allegation that Answering Respondent promotes illegal mining as it uses the limestone extracted by Respondent Nos. 25 to 64 is vexatious and baseless. The Applicants have failed to establish that the Answering Respondent has knowingly obtained limestone from illegal and unauthorized sources and used the same at its - Plant. The Answering Respondent cannot be said to have promoted or encouraged illegal and unauthorized mining of limestone.

26. All the allegations and contentions levelled against the Answering Respondent are presumptive in nature without placing on record any factual material to support its contentions. On this ground alone, the Hon'ble Tribunal should reject any prayer(s)/relief(s) sought against Answering Respondent. The Answering Respondent is a law-abiding entity which is simply carrying out its business activities from the Plant by taking all the requisite measures to protect the environment and minimise the pollution levels. To the best of the Answering Respondent's knowledge, its mineral



supply chain is free from illegal and unauthorised mining activities and is equipped with environmental and social safeguards.

27. The Applicants have failed to highlight any direct or indirect contravention of the prevailing environmental law on the part of the Answering Respondent. The Answering Respondent is renewing all applicable environmental clearances and permits from time-to-time and no breach of prevailing environmental law has been levelled against it by any authority of the Central Government and State Government.

28. The averments made in the Application qua Answering Respondent are false, baseless, and fanciful. The Applicants have arrayed Answering Respondent as a party to the present proceeding without any application of mind. The allegations levelled against Answering Respondent are false and without any documentary evidence. Thus, on this ground alone, the Application deserves to be dismissed qua Answering Respondent.

Prayer at Para 22E of the Application is not applicable against the Answering Respondent

29. The Applicants have prayed for initiation of appropriate legal proceedings including prosecution against the Respondent No. 14 to 64 for violation of the provisions of EIA Notification-2006 and other applicable pollution control laws in Para 22E of the Application. The said prayer has been sought in relation to averments made by the Applicants under Para 7A of the Application, wherein intentional non-compliance of EIA Notification 1994 and 2004 by the mining lessees and negligence by Bureaucratic Respondent Nos. 1-24 due to lack of enforcement action has been pleaded.

30. In this regard it is submitted that neither the Respondent No. 24 (i.e., the Answering Respondent herein) is a Mining Lessee nor is it a bureaucrat Respondent. The Answering Respondent is a limited company involved in manufacturing of its Products.



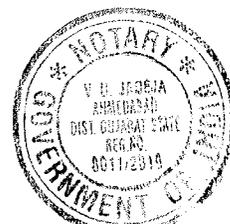
As is clear from the array of parties, there exists three groups of Respondents, viz., Respondent Nos. 1 to 13 – who are the government authorities; Respondent Nos. 14 to 24 – who are private companies involved in manufacturing of various products; and Respondent Nos. 25 to 64 – who are the mining lessees involved in the mining of limestone. The contents of Para 7A and prayer sought under Para 22E pertain to the alleged violations on the part of Respondent Nos. 1 to 13 and Respondent Nos. 25 to 64 and does not pertain to the Answering Respondent. Thus, the prayer at Para 22E is not applicable to the Answering Respondent.

PARA-WISE REPLY

31. Without prejudice to the above Preliminary Submissions/ Objections and the facts of the case, the Answering Respondent submits the Para-wise Reply to the Original Application hereunder.
32. That the contents of Para 1 do not merit any response on behalf of Answering Respondent as the same relates to the matters of record. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.
33. That the contents of Para 2 do not merit any response on behalf of Answering Respondent as the same are in relation to Respondent Nos. 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.
34. That the contents of Para 3 do not merit any response on behalf of Answering Respondent as the same are in relation to Respondent Nos. 1 to 13 and 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.



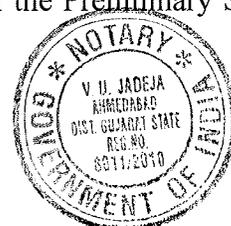
35. That the contents of Para 4 do not merit any response on behalf of Answering Respondent as the same are in relation to Respondent Nos. 1 to 13 and 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.
36. That the contents of Para 5 do not merit any response on behalf of Answering Respondent as the same are in relation to Respondent Nos. 1 to 13 and 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.
37. That the contents of Para 6 do not merit any response on behalf of Answering Respondent as the same are in relation to Respondent Nos. 1 to 13 and 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.
38. That the contents of Para 7, Part A, Sub-paras (a) to (c) do not merit any response on behalf of Answering Respondent as the same either relates to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions. In this regard, the Answering Respondent refers and relies upon Paragraphs 29-30 of the Preliminary Submissions which are not repeated herein for the sake of brevity.
39. That the contents of Para 7, Part B, Sub-paras (a) to (d) do not merit any response on behalf of Answering Respondent as the same either relates to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.
40. That the contents of Para 7, Part C, Sub-paras (a) to (f) do not merit any response on behalf of Respondent No. 24 in so far as the same either relates to matters of record or



are in relation to Respondent Nos. 1 to 13 and 25 to 64. The contents of Sub-para (d) are vehemently denied being false and untrue. It is stated that the Answering Respondent is not helping or supporting Respondent Nos. 25 to 64 in violating the CRZ Notification of 1991 and 2011. The Answering Respondent has no role to play in any mining activities. The Applicants herein have merely stated that a group of Respondent Nos. 14 to 24 promote illegal mining without any material to support the authenticity of such statements. It is reiterated that the Answering Respondent can only control and govern the activities at the Plant and any other activities are beyond its power and accountability. The Answering Respondent puts the Applicants to strict proof before making such false allegations with respect to any help extended by the Answering Respondent for any illegal mining activity. In this regard, the Answering Respondent refers and relies upon Paragraphs 16-18 of the Preliminary Submissions which are not repeated herein for the sake of brevity.

41. That the contents of Para 7, Part D, Sub-paras (a) to (c) do not merit any response on behalf of Answering Respondent as the same either relate to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.

42. That the contents of Para 7, Part E, Sub-paras (a) to (g) do not merit any response on behalf of Respondent No. 24 in so far as the same either relates to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64. The contents of Sub-Para (h) are denied in its entirety. The Applicants have alleged that the Plant is operational in very sensitive areas. It is reiterated that as per Notification 2012 the Eco-sensitive Zones are defined. The geographical location of the Answering Respondent does not fall within the periphery of such Eco-sensitive zone, and hence it is not in breach of any provisions established under the Notification 2012. In this regard, the Answering Respondent refers and relies upon Paragraphs 19-21 of the Preliminary Submissions which are not repeated herein for the sake of brevity.



Para 9 are vehemently denied as the same are pleaded without any application of mind and are devoid of any merits. The Answering Respondent relies and refers on Paragraphs 25-28 of the Preliminary Submissions, the contents of which are not repeated herein for the sake of brevity.

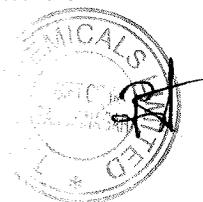
47. That the contents of Para 10, Sub-paras (a) to (dd) do not merit any response on behalf of Respondent No. 24 in so far as the same either relates to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64. That the contents of sub-para (c) of Para 10 are denied by Answering Respondent as it is not aware about illegal mining activities that may have been undertaken by the Mining Leaseholders with an intention of saving transportation cost. The Answering Respondent reserves its right to oppose any disclosure of quantities of limestone procured by it at the stage of hearing.

48. That the contents of Para 11, Sub-paras (a) to (j) do not merit any response on behalf of Answering Respondent as the same either relates to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.

49. That the contents of Para 12 do not merit any response on behalf of Respondent No. 24 as the same either relates to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64.

50. That the contents of Para 13 do not merit any response on behalf of Answering Respondent as the same either relates to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.

51. That the contents of Para 14 do not merit any response on behalf of Respondent No. 24 in so far as the same either relates to matters of record or are in relation to Respondent



Nos. 1 to 13 and 25 to 64. It is denied that there is any alliance or nexus between the activities of Respondent Nos. 25-64 and Answering Respondent. The allegations contained in Para 14 are merely general statement and lack substantiation. Hence, the same cannot be sustained. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.

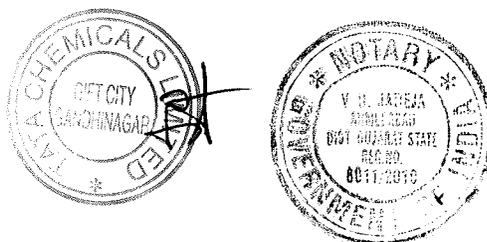
52. That the contents of Para 15 do not merit any response on behalf of Answering Respondent as the same either relates to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64. However, the Answering Respondent reserves its liberty to address any contention during the oral submissions.

53. That the contents of Para 16 do not merit any response on behalf of Answering Respondent as the same either relates to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64.

54. That the contents of Para 17 do not merit any response on behalf of Answering Respondent as the same contains questions of law which either relate to matters of record or are in relation to Respondent Nos. 1 to 13 and 25 to 64.

55. That the contents of Para 18 relate to the locus standi of the Applicants. The question of locus standi is to be decided on the settled principles of law and does not require any specific denial. The Answering Respondent reserves its right to advance its submissions on this aspect at an appropriate stage.

56. That the contents of Para 19 relate to the jurisdiction of the Hon'ble Tribunal. The question of jurisdiction is to be decided on the settled principles of law and does not require any specific response. The Answering Respondent reserves its right to advance its submissions on this aspect at an appropriate stage.

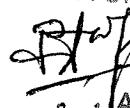


57. That the contents of Para 20 relate to the cause of action of the Applicants to file the present Original Application before the Hon'ble Tribunal. In this regard, it is stated that there exists no cause of action qua Answering Respondent. The Answering Respondent has not indulged in any illegal mining of limestone, nor has it promoted or encouraged the same. On the contrary the Answering Respondent is a reputed company, well known for its integrity and ethics. There is no shred of evidence placed on record by the Applicants qua the Answering Respondent. Hence, the present Original Application is not maintainable qua Answering Respondent.

58. That the contents of Para 21 relate to the question of limitation for filing of the present Original Application before the Hon'ble National Green Tribunal. The question of limitation is to be decided on the settled principles of law and does not require any specific response. The Answering Respondent reserves its right to advance its submissions on this aspect at an appropriate stage.

59. That the contents of Para 22 relate to the Prayers sought by the Applicants. In this regard, only Prayer D & E is relevant qua Answering Respondent. The same cannot be sustained for the reasons set out in the present Affidavit-in-Reply. Accordingly, the Application deserves to be set aside qua the Answering Respondent.

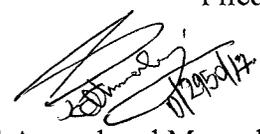
SOLEMNLY AFFIRMED AT AHMEDABAD ON THIS 4TH DAY OF APRIL 2023

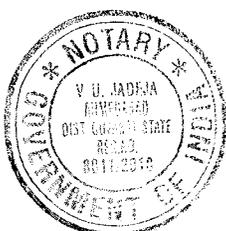
For, TATA CHEMICALS LIMITED

 DEPONENT
 Authorized Signatory

Date: 4th April 2023

Place: Ahmedabad

Filed Through


 For, Shardul Amarchand Mangaldas & Co
 Advocate for Respondent No. 24

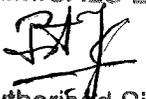


VERIFICATION

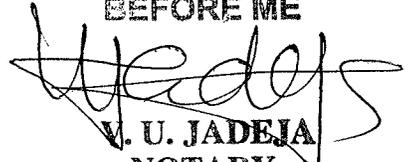
I, Pareshkumar Tank, aged 56 years, resident of Ahmedabad, on behalf of the Answering Respondent herein, do hereby state on oath that the contents of the Affidavit are true and correct and I believe the same to be true to the best of my information and belief. The documents annexed herewith are true and correct copy of their respective originals.

Solemnly affirmed at Ahmedabad on this 4th day of April 2023.

For, TATA CHEMICALS LIMITED


Authorized Signatory
DEPONENT

SOLEMNLY AFFIRMED
BEFORE ME


V. U. JADEJA
NOTARY
GOVT. OF INDIA

