



CIN : L65100DL1994PLC061287

# Fusion Finance Limited

(Formerly known as Fusion Micro Finance Limited)

Date: 02.06.2026

Letter No. FFL/SEC/2026-27/SE-28

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
Symbol: FUSION	Scrip Code: 543652, 977381, 977412

**SUB: Disclosure under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Dear Sir(s),

In continuation to our earlier intimation dated October 17, 2025 and pursuant to regulation 30(2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (LODR Regulations) read with clause 20 of Para A of Part A of Schedule III of the LODR Regulations, we would like to inform you that the Company is in receipt of an order passed by the Income Tax Appellate Tribunal, (ITAT) New Delhi for dismissal of the appeal filed by the Income Tax Officer (ITO) under the Income Tax Act, 1961.

The detailed disclosure as required under Regulation 30 read with Schedule-III of the Listing Regulations read with SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023 is enclosed herewith as "**Annexure-A**" and "**Annexure-B**"

You are requested to take the same on your record.

Thanking you,  
Sincerely,

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

**Vikrant Sadana**  
**Company Secretary & Compliance Officer**

**Place: Gurugram**

**Enc.: a/a**

## Annexure A

### **Details with respect to Regulation 30 read with Schedule III of the Listing Regulations, and SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023**

Name of the Authority	Income Tax Appellate Tribunal, New Delhi  [Appellant: Income Tax Officer, Ward 1(3)(1) (Intl. Tax)]
Nature and details of the action(s) taken, or orders. (s) passed	The order passed by the Income Tax Appellate Tribunal, (ITAT) New Delhi for dismissing the appeal filed by the Income Tax Officer (ITO) before the (ITAT) New Delhi; the order passed under section 250 of the Income Tax Act, 1961 for AY 2020-21 the demand of Rs. 16,62,03,454/- in total including interest but excluding penalty.  (Total tax liability Rs. 9,54,65,663/- and interest liability Rs. 7,07,37,791/-)
Date of receipt of direction or order including and ad-interim or interim orders or any other communication from the authority	May 29, 2026
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 had filed an appeal on July 12, 2024. The appeal was decided in favour of the Company, resulting in the deletion of demand raised under section 201 of the Act.  Subsequently, ITO filed an appeal before ITAT on September 29, 2025 challenging the order passed by CIT(A) u/s 250 of the Act on July 28, 2025.  Now, the appeal filed by the ITO is hereby dismissed by The Income Tax Appellate Tribunal, New Delhi.
Impact on financial, operation or other activities of the listed entity quantifiable in monetary terms to the extent possible	No impact on financials, operation or other activities of the Company
Updates on the Show Cause Notice	The Company has now received an order where total demand of Rs. 16,62,03,454/- has been dismissed. (Total tax liability Rs. 9,54,65,663/- and interest liability- Rs. 7,07,37,791/-)
Explanation for the delay	The Order dated May 29, 2026 passed by the Hon'ble Income Tax Appellate Tribunal (ITAT) has been uploaded on its official website. However, the Company has not the intimation of order over the email. The Company became aware of the Order during its routine review of communication issued on the ITAT website.

**Annexure B**

**Details with respect to Regulation 30 read with Schedule III of the Listing Regulations, and SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023**

Name of the Authority	Income Tax Appellate Tribunal, New Delhi  [Appellant: Income Tax Officer, Ward 1(3)(1) (Intl. Tax)]
Nature and details of the action(s) taken, or orders. (s) passed	The order passed by the Income Tax Appellate Tribunal, (ITAT) New Delhi for dismiss the appeal filed by the Income Tax Officer (ITO) before the (ITAT) New Delhi; the order passed under section 250 of the Income Tax Act, 1961 for AY 2021-22 the demand of Rs. 11,18,43,066/- in total including interest but excluding penalty.  (Total tax liability Rs. 7,10,23,805/- and interest liability Rs. 4,08,19,261/-)
Date of receipt of direction or order including andad-interim or interim orders or any other communication from the authority	May 29, 2026
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 filed an appeal on July 12, 2024. The appeal was decided in favour of the Company, resulting in the deletion of demand raised under section 201 of the Act.  Subsequently, ITO has filed appeal before ITAT on Sep 29, 2025 challenging the order passed by CIT(A) u/s 250 of the Act on July 28, 2025.  Now, the appeal filed by the ITO is hereby dismissed by The Income Tax Appellate Tribunal, New Delhi.
Impact on financial, operation or other activities of the listed entity quantifiable in monetary terms to the extent possible	No impact on financials, operation or other activities of the Company.
Updates on the Show Cause Notice	The Company has now received an order where total demand of Rs. 11,18,43,066/- has been dismissed. (Total tax liability Rs. 7,10,23,805/- and interest liability- Rs. 4,08,19,261/-)
Explanation for the delay	The Order dated May 29, 2026 passed by the Hon'ble Income Tax Appellate Tribunal (ITAT) has been uploaded on its official website. However, the Company has not the intimation of order over the email. The Company became aware of the Order during its routine review of communication issued on the ITAT website.