

**SEEPZ SPECIAL ECONOMIC ZONE
ANDHERI (EAST), MUMBAI.**

.....

AGENDA FOR

**MEETING OF THE APPROVAL COMMITTEE FOR
SECTOR SPECIFIC SPECIAL ECONOMIC ZONE FOR
IT/ITES AT PUNE OF M/S. EON KHARADI
INFRASTRUCTURE PVT. LTD.-SEZ, PHASE II.**

DATE : 12.09.2025

TIME : 11.00 A.M.

**MEETING OF THE APPROVAL COMMITTEE FOR
SECTOR SPECIFIC SPECIAL ECONOMIC ZONE FOR
IT/ITES AT PUNE, UNDER THE CHAIRMANSHIP OF
DEVELOPMENT COMMISSIONER, SEEPZ-SEZ ON
12.09.2025**

INDEX

Agenda Item No.	Subject
Agenda Item No. 01 :-	Confirmation of the Minutes of the meeting held on 30.06.2025
Agenda Item No. 02 :-	Action taken report for the Minutes of the meeting held on 30.06.2025
Agenda Item No. 03 :-	Application for approval of Merger of LOAs submitted by M/s. Allianz Services Pvt Ltd
Agenda Item No. 04:-	Application for approval for Sharing of Common Infrastructure facilities submitted by M/s. CA(India) Technologies Pvt. Ltd.
Agenda Item No. 05:-	Application for approval for addition of area with Revision in Projections submitted by M/s. Synechron Technologies Pvt. Ltd
Agenda Item No. 06:-	Application for approval for Broad Banding of Services without Revision in Projections submitted by M/s, UBS Business Solution (India) Pvt. Ltd.

Agenda Item No. 07:-	Monitoring of performance of M/s. Mphasis Limited.
-----------------------------	---

मैसर्स ईओएन खराडी इंफ्रास्ट्रक्चर प्रा. लिमिटेड-चरण- II एसईजेड, खराडी, पुणे, के आईटी-आईटीईएस सेक्टर के विशिष्ट विशेष आर्थिक क्षेत्र के लिए क्षेत्रीय विकास आयुक्त सीपज़-एसईजेड, मुंबई की अध्यक्षता में 30.06.2025 को आयोजित अनुमोदन समिति की 53 वीं बैठक का विवरण।		
1	एसईजेड का नाम	मैसर्स.ईओएन खराडी इंफ्रास्ट्रक्चर प्रा. लिमिटेड-एसईजेड, चरण II
2	क्षेत्र	आईटी/आईटीईएस
3	मीटिंग नं	53 वी
4	तारीख	30.06.2025

उपस्थित सदस्य:

क्र.	नाम और पदनाम (एस/श्री.)	विभाग
1	श्रीमती मितल हिरेमठ संयुक्त विकास आयुक्त	पुणे क्लस्टर एसईजेड, पुणे
2	श्री अभिनव राठी उप आयुक्त, आयकर विभाग	आयकर विभाग से नामित
3	श्री संजीव पाटिल, उद्योग अधिकारी	महाराष्ट्र सरकार से नामित
4	श्री. मंचक जाधव, उप-क्षेत्रीय अधिकारी	महाराष्ट्र प्रदूषण नियंत्रण बोर्ड से नामित
5	श्रीमती पुष्पा गंगावणे, एफटीडीओ	पुणे डीजीएफटी विभाग से नामित
6	श्री प्रशांत रोहणेकर, अधीक्षक	सीमा शुल्क विभाग पुणे नामित

विशेष आमंत्रित :

क्र.	नाम एवं पदनाम(श्री/ श्रीमती)	विभाग
1	श्री. शम्भू दयाल मीना, विनिर्दिष्ट अधिकारी	सीपज़-एसईजेड, पुणे क्लस्टर

एजेंडा आइटम नंबर 01: दिनांक 09.05.2025 को आयोजित 52 वीं बैठक के कार्यवृत्त की पुष्टि।

विचारविमर्श के बाद, समिति ने 09.05.2025 को आयोजित अनुमोदन समिति की 52 वीं बैठक के कार्यवृत्त की पुष्टि की।

एजेंडा आइटम नंबर 02: 09.05.2025 को आयोजित बैठक के कार्यवृत्त के लिए की गई कार्रवाई रिपोर्ट।

विचार-विमर्श के बाद, समिति ने 09.05.2025 को आयोजित बैठक के लिए की गई कार्रवाई रिपोर्ट नोट की है।

एजेंडा आइटम नंबर 03: मैसर्स जेनसर टेक्नोलॉजीज लिमिटेड के प्रदर्शन की निगरानी।

विचार-विमर्श के बाद, समिति ने एसईजेड नियम, 2006 के नियम 54 के संदर्भ में द्वितीय ब्लॉक अवधि के प्रथम वर्ष यानी वित्त वर्ष 2024-25 के लिए इकाई के प्रदर्शन को नोट किया। नीचे विस्तृत रूप से बताया गया है:

- इकाई ने द्वितीय ब्लॉक अवधि के प्रथम वर्ष अर्थात् वित्त वर्ष 2024-25 के दौरान संचयी आधार पर 113.02 करोड़ रुपये के अनुमानित निर्यात के मुकाबले 70.72 करोड़ रुपये का निर्यात राजस्व हासिल किया है।
- इकाई ने वित्त वर्ष 2024-25 में संचयी आधार पर 69.30 करोड़ रुपये यानी 97.99% का सकारात्मक एनएफई हासिल किया है।
- इकाई ने 286 के अनुमानित रोजगार के मुकाबले 274 कर्मचारियों (पुरुष-209 महिला-65) को रोजगार प्राप्त किया है।
- इकाई को लंबित डीएसपीएफ दाखिल करना आवश्यक है।

अध्यक्ष को धन्यवाद ज्ञापन के साथ बैठक समाप्त हुई।

Minutes of the 53 th Meeting of the Approval Committee held under the Chairmanship of Zonal Development Commissioner SEEPZ-SEZ, Mumbai for Sector Specific Special Economic Zone for IT/ITES of M/s. EON Kharadi Infrastructure Pvt. Ltd.–Phase-II SEZ, Kharadi, Pune, held on 30.06.2025		
1	Name of the SEZ	M/s. EON Kharadi Infrastructure Pvt. Ltd.-SEZ, Phase II
2	Sector	IT/ITES
3	Meeting No.	53 th
4	Date	30.06.2025

Members present:

Sr No.	Name and Designation(S/Shri.)	Department
1	Smt. Mital Hiremath Jt. Development Commissioner	Pune Cluster SEZ, Pune
2	Shri. Abhinav Rathi Dy. Commissioner, IT	Nominee of Income Tax, Pune
3	Shri. Sanjiv Patil, Industries Officer	Nominee of Govt. of Maharashtra
4	Shri. Manchak Jadhav Sub-Regional Officer	Nominee of Maharashtra Pollution Control Board
5	Smt. Pushpa Gangawane. FTDO	Nominee of DGFT, Pune
6	Shri. Prashant Rohnekar Superintendent	Nominee of Customs, Pune

Special Invitee:

Sr	Name and Designation	Department
1	Shri. Shambhu Dayal Meena Specified Officer	SEEPZ-SEZ, Pune Cluster

Agenda Item No.01: Confirmation of the Minutes of the 52th meeting held on 09.05.2025

After deliberation, the Committee confirmed the minutes of the 52th meeting of Approval Committee held on 09.05.2025.

Agenda Item No.02: Action taken report for the minutes of the meeting held on 09.05.2025

After deliberation, the Committee has noted the Action taken report for the meeting held on 09.05.2025.

Agenda Item No.03: Monitoring of Performance for M/s Zensar Technologies Ltd.

After deliberation, the committee noted the performance of the unit for First year of 2nd Block period. i.e. FY2024-25., in terms of Rule 54 of SEZ Rules, 2006. As detailed below:

- The unit has achieved export revenue of **Rs 70.72 Cr.** against the projected export of **Rs.113.02 Cr.** on cumulative basis during 1st year of 2nd Block period i.e FY 2024-25.
- The unit has achieved positive NFE of **Rs. 69.30 Cr.** i.e. 97.99 % in FY 2024-25 on cumulative basis.
- The unit has achieved employment of **2 4 7** employees (Men-209, Women-65) against the projected employment of 286.
- The Unit is required to file the pending DSPF.

Meeting ended with a vote of thanks to the Chair.

(ज्ञानेश्वर बी. पाटील, आईएएस)
(Dnyaneshwar B. Patil, IAS)
अध्यक्ष एवं विकास आयुक्त
Chairman-cum- Development Commissioner

Action Taken for Approval Committee held on 30-06-2025

Agenda Item No.	Subject	Remarks
Agenda Item No. 01	Confirmation of the Minutes of the 52nd Meeting held on 09-05-2025	Committee confirmed the minutes of meeting held on 09.05.2025
Agenda Item No. 02	Application for Monitoring of Performace(M/s. Zensar Technologies Limited)	Approval letter is issued to the Unit on 04.07.2025.

**GOVERNMENT OF INDIA,
OFFICE OF THE DEVELOPMENT COMMISSIONER,
SEEPZ SPECIAL ECONOMIC ZONE, GOVT. OF INDIA,
ANDHERI (EAST), MUMBAI**

AGENDA NOTE FOR CONSIDERATION OF APPROVAL COMMITTEE

a. Proposal :

Proposal dated 14.08.2025 and 28.08.2025 submitted by M/s. Allianz Services Pvt Ltd., IT/ITES Units for Merger of LOAs of their 2 existing units located at EON Kharadi Infrastructure Pvt Ltd – SEZ.

b. Specific Issue on which decision of AC is required: -

Approval of the Committee for merger of both the LOAs of M/s. Allianz Services Pvt Ltd. Units located at EON Kharadi Infrastructure Pvt Ltd – SEZ, in terms of 4th proviso of Rule 19(2) of SEZ Rules, 2006.

c. Relevant provisions of SEZ Act, 2005 & Rules, 2006/Instruction/ Notification :-

As per the 4th proviso of Rules 19 (2) of SEZ Rules, 2006;

“Provided also that the Approval Committee may also approve proposal for merger of Letter of approvals of two units of the same company or firm subject to the conditions that these Units falls within the same Special Economic Zone and after merger, Block Period for calculation of Net Foreign Exchange shall be from the date of commencement of production of Unit which commenced operation first and the Income tax exemption period shall be considered from the date start of operation of the first Unit.”

d. Other Information: -

In view of the above M/s. Allianz Services Pvt Ltd. who are having 2 units within the same SEZ has submitted application for merger of the units.

Approved projections (Unit I & Unit II) (Rs. In Cr.)

Sr. No.	Description	Existing Approved Projections of Unit I		Existing Approved Projections of Unit II		Revised Projections Post-Merger	
	LOA No.	SEEPZ-SEZ/EKIPL-SEZ/ACISPL/44/2019-20/1495 dt. 02.05.2019		SEEPZ-SEZ/EKIPL-SEZ/ACISPL/45/2019-20/1492 dt. 02.05.2019		SEEPZ-SEZ/EKIPL-SEZ/ACISPL/44/2019-20/1495 dt. 02.05.2019	
1.	Area (Built up area) Sq. ft	Office 1A, 5th floor, Tower-B, EON Kharadi Infrastructure Pvt Ltd SEZ. Area Admeasuring (17856 Sq. Ft.)		Office 1B, 5th floor, Tower-B, EON Kharadi Infrastructure Pvt Ltd SEZ. Area Admeasuring (17856 Sq. Ft)		Office 1A and 1B, 5th floor, Tower-B EON Kharadi Infrastructure Pvt Ltd. Total Area Admeasuring (35712 Sq. Ft.)	
2.	Employment	Men	Women	Men	Women	Men	Women
		215	127	183	85	375	213
		342		228		588	
3.	Investment-Plant and Machinery						
	Indigenous Capital Goods	2.49		1.66		5.10	
	Imported Capital Goods	1.10		0.44		1.00	

4.	Input of Services			
	Indigenous Services	29.88	18.31	48.19
	Imported Services	0	0	0

The LOA of Unit I & II was renewed on 03.05.2025 for 2nd block period (i.e FY 2025-26 TO FY 2029-30) which will be considered for the purpose of calculation of Net Foreign Exchange, after the merger.

Approved Projections: (Unit I – 2nd Block Period) (Rs. In Cr)

	2024-25	2025-26	2026-27	2027-28	2028-29	TOTAL
FOB Value of Exports	77.01	81.67	86.70	91.96	97.63	434.98
FE Outgo	7.48	7.16	7.52	7.90	8.31	38.37
NFE	69.53	74.51	79.18	84.06	89.32	396.61

Approved Projections: (Unit II – 2nd Block Period) (Rs. In Cr)

	2024-25	2025-26	2026-27	2027-28	2028-29	TOTAL
FOB Value of Exports	51.34	54.45	57.80	61.31	65.09	289.99
FE Outgo	4.55	4.78	5.02	5.27	5.54	25.16
NFE	46.79	49.67	52.78	56.04	59.55	264.83

POST MERGER - Proposed Projections: (Unit I) (Rs. In Cr)

	2024-25	2025-26	2026-27	2027-28	2028-29	Total
FOB Value of Exports	127.29	135.48	144.31	154.09	165.18	726.35
FE Outgo	11.86	11.94	13.04	13.17	13.85	63.85
NFE	115.43	123.54	131.27	140.93	151.33	662.49

Information: -

M/s. Allianz Services Pvt Ltd. are having 2 units located at M/s. EON Kharadi Infrastructure Pvt Ltd. In terms of 4th proviso to Rule 19(2) units with two or more LOAs of the same company and falling within the same SEZ can merge their LOAs with the approval of the Approval Committee and after merger the block period for calculation of NFE shall be from the date of commencement of production of the Unit which commenced operation first.

In view of the above M/s. Allianz Services Pvt Ltd., having 2 units located at EON Kharadi Infrastructure Pvt Ltd. have submitted their application for merger of both the units. Unit I was issued Letter of Approval No. SEEPZ-SEZ/EKIPL-SEZ/ACISPL/44/2019-20/1495 dt. 02.05.2019. Their date of Commencement of Business is 02.01.2020. Hence, post-merger the operation of both the units viz Unit I and Unit II will not be operational and will be merged with Unit I.

The details of both the units are as detailed below:

Unit	LOA NO. and Date	Date of Commence-ment	LOA Valid upto	Block Period	Located at	Area Sqft
1	SEEPZ-SEZ/EKIPL-SEZ/ACISPL/44/2019-20/1495 dt. 02.05.2019	02.01.2020	01.01.2030	2 nd	Office No. 1A, 5th Floor, Tower B, EON Kharadi Infrastructure Pvt. Ltd.-SEZ, Phase-II, S. No. 72/2/1, Kharadi Pune-411014.	17856 Sq. Ft.
2	SEEPZ-SEZ/EKIPL-SEZ/ACISPL/45/2019-20/1492 dt. 02.05.2019	26.02.2020	25.02.2030	2 nd	Office No. 1B, 5th Floor, Tower B, EON Kharadi Infrastructure Pvt. Ltd.-SEZ, EON Phase-II, S. No. 72/2/1, Kharadi, Pune-411014.	17856 Sq. Ft.

Reason for Merger:

The unit has submitted the following reasons for merger;

- Due to the increase in Business and increase in headcount, the unit is considering the option of merging both units.
- The unit informed that, due to seating capacity constraints and limitations on employee movement between the two units.
- The unit has informed that clubbing the operation and working in shifts aligned with different time zones will help mitigate capacity constraints, facilitate administrative convenience, and reduce compliance requirements.

Documents Enclosed

The unit has submitted the following documents:

- a. Form F3 filed through SEZ Online System
- b. Copy of Board resolutions authorized persona as authorized signatory
- c. Copy of all LOA of both the units
- d. Revised Foreign Exchange Balance Sheet
- e. List of imported and Indigenous capital goods
- f. Copy of revised application for merger

e. Recommendation:

- As Date of Commencement of Unit-I is 02.01.2020, upon merger of both the LOAs of the unit, the block period of Unit-I will be considered for calculating NFE of the merged units i.e., FY 2025-26 to FY 2029-30.
- The Projections of Exports, NFE and Employment after Post merger of both the units is higher than the projections approved by the units prior to merger.
- The Approval Committee may kindly consider the proposal of the units for merger of their LOAs, in terms of 4th proviso of Rule 19(2) of SEZ Rules, 2006.

**GOVERNMENT OF INDIA,
OFFICE OF THE DEVELOPMENT COMMISSIONER,
SEEPZ SPECIAL ECONOMIC ZONE, GOVT. OF INDIA,
ANDHERI (EAST), MUMBAI**

AGENDA NOTE FOR CONSIDERATION OF APPROVAL COMMITTEE

a. Proposal :

Proposal dated 13.08.2025 submitted by M/s.CA(India) Technologies Pvt. Ltd., located at M/s. EON Kharadi Infrastructure Pvt. Ltd.-SEZ Phase-I, Kharadi Pune-411014. for approval w.r.t. Sharing of Common Infrastructure facilities (Internet Connectivity) with their other SEZ unit. M/s. LSI India Research & Development Pvt. Ltd.

b. Specific Issue on which decision of AC is required: -

Approval for sharing of Common Infrastructure facilities (Internet Connectivity) with their other SEZ unit namely, M/s. LSI India Research & Development Pvt. Ltd. located at 3rd Floor, Part B, wing 2, Plot No.1. S.No. 77, MIDC Kharadi Knowledge Park Pune-411014.under Rule 27(5) of SEZ Rules, 2006.

**c. Relevant provisions of SEZ Act, 2005 & Rules, 2006/Instruction/
Notification :-**

As per Rule 27(5) of SEZ Rules, 2006 which prescribes : “A unit may import or procure from Domestic Tariff Area, all types of goods and services, without payments of duty, taxes or cess for creating a central facility for use by units in Special Economic Zone and where such facility is created for software development, the same may also be accessed by software exporters of Domestic Tariff Area.”

d. Other Information: -

Details of Proposed Sharing of Common infrastructure facilities (Internet Connectivity): -

M/s. CA (India) Technologies Pvt. Ltd., located at Ground to 3rd Floor, Wing-2, Cluster-B, Plot No.1, Survey No.77, MIDC, Kharadi Knowledge Park, Pune-411014 (LOA No. SEEPZ-SEZ/CAITPL/46/EKIPL-SEZ/19-20 dated 15.02.2025), proposes to temporarily **share its internet leased line** with its affiliate company **M/s. LSI India Research & Development Pvt. Ltd.**, located at 3rd Floor, Wing-2, Part-B of the same premises (LOA No. SEEPZ-SEZ/EKIPL-SEZ/LSI/75/2024-25/1222 dated 18.12.2024). LSI has acquired a portion of space and duty-paid assets from CA India and registered a new unit under GSTIN:27AAECM1677N3ZW. Both entities are owned by **M/s. Broadcom**. As LSI is in the process of setting up its own internet infrastructure, this sharing arrangement will support its SEZ operations at EON Kharadi, which commenced from **1st March 2025**, and will continue **until October 2025 or until their setup is completed**, whichever is earlier. Details of infrastructure facilities to be shared are as detailed below:

Sr. No.	Location of the infrastructure facility	Location of the unit who intend to share the infrastructure	Facility to be shared

1	M/s. CA (India) Technologies Pvt. Ltd. Location:- Ground to 3 rd Floor, wing-2, Cluster –B, Plot No.1, Survey No.77, MIDC, Kharadi Knowledge Park, Kharadi Pune-411014.	M/s. LSI India Research & Development Pvt. Ltd. Location: - 3 rd Floor, Wing-2, Part-B, Plot No.1, Survey No.77,MIDC, Kharadi Knowledge Park, Kharadi Pune-411014.	Internet Connectivity
---	--	---	-----------------------

Information: -

- M/s. CA (India) Technologies Pvt. Ltd. has been granted LOA No. SEEPZ-SEZ/CAITPL/46/EKIPL-SEZ/2019-20 Dated 28.10.2019 Location: Ground to 3rd Floor, wing-2, Cluster –B, EON Kharadi Infrastructure Pvt. Ltd.-SEZ Plot No.1, Survey No.77, MIDC, Kharadi Knowledge Park, Kharadi Pune-411014.
- LOA valid up to: 14.02.2030
- The Unit has submitted following document:

i. Application for sharing of internet connection with M/s. LSI India Research & Development Pvt. Ltd.

e. Recommendation:

The proposal of the units, sharing of Common infrastructure facilities (Internet Connectivity) between M/s. CA (India) Technologies Pvt. Ltd. and M/s. LSI India Research & Development Pvt. Ltd. located at EON Kharadi Infrastructure Pvt. Ltd. Phase-I may be considered by the Approval Committee in terms of Rule 27(5) of SEZ Rules, 2006.

**GOVERNMENT OF INDIA,
OFFICE OF THE DEVELOPMENT COMMISSIONER,
SEEPZ SPECIAL ECONOMIC ZONE, GOVT. OF INDIA,
ANDHERI (EAST), MUMBAI**

AGENDA NOTE FOR CONSIDERATION OF APPROVAL COMMITTEE

a. Proposal :

Proposal dated 14.08.2025 submitted by M/s. Synechron Technologies Pvt. Ltd., an IT/ITES unit located in M/s. EON Kharadi Infrastructure Pvt. Ltd. SEZ, Phase – II, Kharadi, Pune for approval for addition of area with Revision in Projections.

b. Specific Issue on which decision of AC is required: -

Approval of the Committee in terms of Rule 19(2) of SEZ Rules, 2006 for Addition of area admeasuring 71,426 Sq. ft. with Revision in projection.

**c. Relevant provisions of SEZ Act, 2005 & Rules, 2006/Instruction/
Notification :-**

As per First Proviso to Rule 19(2) of SEZ Rules,2006

“PROVIDED that the Approval Committee may also approve proposals for broad banding, diversification, enhancement of capacity of production, change in the items of manufacture or service activity, if it meets the requirements of rule 18”

d. Other Information: -

Location / area proposed to be added:

Existing address and area	Area proposed to be Added	Total area after Addition
Office 1, 6 th Floor & 11 th Floor at Tower-B, EON Kharadi Infrastructure Pvt. Ltd.-SEZ, Phase-II,Kharadi Pune-411014.	3 rd Floor at Tower-B, M/s. EON Kharadi Infrastructure Pvt. Ltd.-SEZ, Phase-II,Kharadi Pune-411014.	Office1, 3 rd ,6 th and 11 th Floor at Tower-B, M/s. EON Kharadi Infrastructure Pvt. Ltd.-SEZ, Phase-II,Kharadi Pune-411014.
Admeasuring area of 94,345 Sq.ft.	Admeasuring area of 71,426 Sq.ft.	Admeasuring area of 1,65,771 Sq.ft.

Revision in Projection:

Projections of Investment and Employment: (Rs. In Cr.)

Sr. No	Item	Existing Projection	Total Revised Projection
A	Investment in Capital Goods		
I	Indigenous CG	29.26	52.89
Ii	Imported CG	5.01	5.01
	TOTAL	34.27	57.90
B	Input Services		
i	Indigenous Services	78.01	97.97
ii	Imported Services	0.13	2.65

	TOTAL	78.14		100.62	
C	Employment	Men	Women	Men	Women
		485	65	1164	356
	TOTAL	550		1520	

Approved Projection: (Rs. In Cr)

Particulars	2021-22	2022-23	2023-24	2024-25	2025-26	Total
FOB Value of exports	24.24	119.00	112.40	163.97	199.68	619.29
FE outgo	5.10	0.09	0.00	0.03	0.03	5.25
NFE	19.14	118.91	112.40	163.94	199.65	614.04

Proposed Projection: (Rs. In Cr)

Particulars	2021-22	2022-23	2023-24	2024-25	2025-26	Total
	Actual	Actual	Actual			
FOB Value of exports	24.24	119.00	112.40	277.00	270.23	802.87
FE outgo	5.10	0.09	0.00	0.00	1.24	6.43
NFE	19.14	118.91	112.40	277.00	268.99	796.44

Information: -

- M/s Synechron Technologies Pvt. Ltd., bearing LOA No. SEEPZ-SEZ/EKIPL-SEZ/STPL/51/2020-21, Dated 12.04.2021. located at 11th Floor, Tower-B, EON Kharadi Infrastructure Pvt. Ltd., SEZ, Phase-II, Kharadi, Pune-411014.
- Date of Commencement: 07.01.2022
- LOA is valid upto: 06.01.2027

Reason for Additional Area and Projections:

The unit has informed that they wish to expand their operations and propose to lease additional area and expand the unit to enable them to carry on their operations according to the revised business plans/projections and to achieve the revised Net Foreign Exchange (NFE).

The unit has submitted the following documents with the application:

- Copy of Form F3
- Copy of Consent letter from Developer
- Copy of letter of intent
- Copy of Floor plan
- Copy of Balance Sheet
- Copy of Financial Projection
- Copy of Additional capital goods
- Copies of LOA
- Copy of Board Resolution
- Copy of list of Directors
- Copy of Authority Letter

e. Recommendation:

Approval Committee may kindly consider the proposal of the unit for the Addition of Area with Revision in Projection, in terms of Rule 19(2) of SEZ Rules, 2006.

**GOVERNMENT OF INDIA,
OFFICE OF THE DEVELOPMENT COMMISSIONER,
SEEPZ SPECIAL ECONOMIC ZONE, GOVT. OF INDIA,
ANDHERI (EAST), MUMBAI**

AGENDA NOTE FOR CONSIDERATION OF APPROVAL COMMITTEE

a. Proposal :

Proposal Dated 29.08.2025 Submitted by M/s. UBS Business Solutions (India) Pvt. Ltd., SEZ Unit located at EON Kharadi Infrastructure Pvt. Ltd.-SEZ, Phase - II for approval for Broad Banding of Additional Services without revision in projection.

b. Specific Issue on which decision of AC is required: -

Approval of Approval Committee for Broad Banding of additional items of service in the existing LOA without revision in projection. As per 1st proviso to Rule No. 19(2) of SEZ Rules, 2006.

**c. Relevant provisions of SEZ Act, 2005 & Rules, 2006/Instruction/
Notification :-**

As per 1st proviso to Rule No. 19(2) of SEZ Rules, 2006

["Provided that the Approval Committee may also approve proposals for broadbanding, diversification, enhancement of capacity of production, change in the items of manufacturing or service capacity, if it meets the requirements of rule 18"].

d. Other Information: -

Proposal of the unit: broad banding of additional services in existing LOA as details Below:

ITC/HSN	Existing Items of Services	ITC/HSN	Proposed Items of Services
998313	Information technology IT consulting and support services	998315	Hosting And Information Technology IT Infrastructure Provisioning Services. (i.e. Network Access/Connectivity Infrastructure Services)
998311	Management consulting and management services		

Information: -

- M/s. UBS Business Solutions(India) Pvt. Ltd. granted LOA NO. SEEPZ/EKIPL-SEZ/CSSAG/29/2017-18, Dated 24.08.2017.
- Location: 1st to 11th Floor, Building Tower A, M/s EON Kharadi Infrastructure Pvt. Ltd., - SEZ, Phase II, Survey No. 72, Hissa No. 2/1, Kharadi, Pune-411014..
- DCP of the unit is 24.11.2017
- LOA Validity up to 23.11.2027
- The Unit has filed online application form F-3 for broad banding of services.

Reason for Broad Banding of Services

The unit has submitted that, in addition to the existing services, they intend to engage in providing enterprise network access/connectivity setup as a service at the EON Phase-II location for use by other units/legal entities of the UBS Group in India. As stated, they have multiple UBS group entities that will use the enterprise network access/connectivity infrastructure held and to be provided by the EON SEZ unit. The hub at their UBS EON unit will be accessed by all other locations through local and international leased lines for delivery operations. This setup will also enable employees of such units/entities working remotely to access the required services of the unit for their operations/activities.

Having such a common hub at EON, accessible to all India-based UBS users, will optimize resources by creating a single-point infrastructure for carrying and managing data traffic, thereby avoiding duplicate infrastructure setup at each location. These services will be categorized under ITC HSN 998315, and the unit will raise periodic invoices in foreign currency to such UBS units/legal entities along with GST, as applicable. The remittance will be received in the foreign exchange account of the SEZ unit for the provision of the referred services.

Reason for No Changes in Projections on account of inclusion of additional Services:

The unit informs that projections will not be revised due to the inclusion of this activity, as it does not require significant additional manpower. The services relate to network infrastructure support, which is largely self-operated. Moreover, the revenue expected from these services is minimal. However, the services are critical to support other units in carrying out their export and domestic operations efficiently.

e. Recommendation:

Approval Committee may consider the proposal of the unit for Broad Banding of Additional Services without revision in projections, in terms of Rule 19(2) of SEZ Rules, 2006

**GOVERNMENT OF INDIA,
OFFICE OF THE DEVELOPMENT COMMISSIONER,
SEEPZ SPECIAL ECONOMIC ZONE, GOVT. OF INDIA,
ANDHERI (EAST), MUMBAI**

AGENDA NOTE FOR CONSIDERATION OF APPROVAL COMMITTEE

a. Proposal :

Monitoring of the performance of M/s. Mphasis Limited., an IT/ITES Enabled Services located at M/s. EON Kharadi Infrastructure Pvt. Ltd. Phase-II for 5 Years of 1st Block Period i.e. 2020-21 to FY 2024-25.

b. Specific Issue on which decision of AC is required: -

Monitoring of the performance of the unit for 5 Years of 1st Block Period i.e. 2020-21 to FY 2024-25 in terms of Rule 54 of SEZ Rules, 2006.

**c. Relevant provisions of SEZ Act, 2005 & Rules, 2006/Instruction/
Notification :-**

As per Rule 54 of SEZ Rules, 2006

“Performance of the Unit shall be monitored by the Approval Committee as per the guidelines given in Annexure appended to these rules”.

d. Other Information: -

**Performance as compared to projections: for 1st Block Period FY 2020-21 to FY 2024-25
(Rs. In Cr.)**

	2020-21	2021-22	2022-23	2023-24	2024-25	TOTAL
FOB value of export	72.23	126.41	180.59	234.77	288.94	902.94
FE outgo	11.00	1.00	1.00	1.00	1.00	15.00
NFE	61.23	125.41	179.59	233.77	287.94	887.94

Performance as compared to projections: (Rs. In Cr.)

Year	Export		F.E. OUTGO				
	Projected	Actual	Raw Material (Goods/Services)		C.G. import		Other outflow
			Projected	Actual	Projected	Actual	
2020-21	72.23	0.44	0.00	0.00	15.00	2.99	0.00
2021-22	126.41	0.89				1.06	0.00
2022-23	180.59	1.41				0.39	0.02
2023-24	234.77	5.62				0.98	0.00
2024-25	288.94	27.21				0.00	0.05
TOTAL	902.94	35.57	0.00	0.00	15.00	5.41	0.7

Cumulative NFE achieved: (Rs. in Cr.)

Year	Cumulative NFE Achieved	Cumulative % NFE Achieved
2020-21	0.13	31.84%
2021-22	0.62	46.94%
2022-23	1.57	57.38%
2023-24	6.65	79.56%
2024-25	33.28	93.52%

Employment Achievement

	Approved	Achieved
Men	550	251
Women	250	138
Total	800	389

Reason for Less Export:

The unit stated that during the peak of the COVID-19 pandemic, they commenced operations and subsequently experienced significant changes in the business, which led to a reduction in export volumes. Furthermore, with respect to employment, a portion of EON Phase 2 was converted to MRLAD. The projected headcount was 800; however, the current employment stands at 398 in Mphasis and approximately 166 in MRLAD, bringing the total to 564.

LOA No. & Date	SEEPZ-SEZ/EKIPL-SEZ/ML/47/2019-20 Dated 13.01.2020
Location of Unit	12 th Floor in Tower B, EON- Kharadi Infrastructure Pvt Ltd-SEZ, Phase II, Sr No 72, Hissa No 2 by 1, Kharadi, Pune-411014
Validity of LOA	31.08.2025
Item(s) of manufacture/ Services	IT & ITES
Date of commencement of production	01.09.2020
Execution of BLUT	Rs. 17.55 Crores
Outstanding Rent dues	NA
Labour Dues	NA
Validity of Lease Agreement	-
Pending CRA Objection, if any	NA
Pending Show Cause Notice/ Eviction Order/Recovery Notice/ Recovery Order issued, if any	NA
Projected employment for the block period	389 (Men-251, Women-138)
No. of employees as on 31.03.2025	

Area allotted (in sq. ft.)		61641.97 Sq.ft.
Area available for each employee per sq.ft. basis (area / no. of employees)		158.46 Sq.ft.
Investment till date	Building	-
	Plant & Machinery	11.70
Quantity and value of goods exported under Rule 34 (unutilized goods)		NA
Value Addition during the monitoring period		NA
Whether all the APRs being considered now has been filed well within the time limit, or otherwise. If no, details of the Year along with no of days delayed to be given.		Yes

The Specified Officer report vide letter dated 01.08.2025 has reported as detailed below:

EXPORT (Rs. In Cr)

Year/ Period	Figures reported in APR	Figures as per Softex/ Customs Records	Difference if any	Reason for Difference/Remark
(1)	(2)	(3)	(4)	(5)
2020-21	0.44	0.44	0.00	--
2021-22	0.89	0.88	0.01	Difference is due to Exchange Rate Variation
2022-23	1.41	1.54	-0.13	Difference is due to Exchange Rate Variation
2023-24	5.63	5.58	0.05	Difference is due to Exchange Rate Variation
2024-25	27.22	29.66	-2.44	Due to internal adjustments of the unit and their client the unit requested for the cancellation of Invoice No 2Z4IC250025, 2Z4IC250026 Dt. 06.05.2024 (amounting to Rs 2.27 Crores). The report in the matter is submitted. The remaining difference of Rs 0.17 Crores is due to Exchange Rate Variation.

IMPORT

(Capital Goods including procurement done on IUT (from SEZ, EOU, STPI, EHTP) basis.) (Rs. In Cr)

Year/Period	Figures reported in APR (FOB Value)	Figures as per Customs Records	Difference if any	Reason for Difference/Remark
(1)	(2)	(3)	(4)	(5)
2020-21	2.99	4.00	-1.01	Inadvertently the unit filed two B/E's twice. The goods were received against one set of B/E's and the in respect of other set of B/E's the unit filed Freeform for cancellation.
2021-22	4.05	1.06	2.99	As per APR format the value reported is Cumulative Values. And the Actual Import Procurement of Rs 1.06 crores as per CUSTOMS Records for this Year
2022-23	4.44	0.43	4.01	As per APR format the value reported is Cumulative Values. And the Actual Import Procurement of Rs 0.43 crores as per CUSTOMS Records for this Year
2023-24	5.42	0.98	4.44	As per APR format the value reported is Cumulative Values. And the Actual Import Procurement of Rs 0.98 crores as per CUSTOMS Records for this Year
2024-25	5.42	0.00	5.42	As per APR format the value reported is Cumulative Values. And the Actual Import Procurement is Nil as per CUSTOMS Records for this Year

Raw Material (Rs. In Cr)

Year/Period	Figures reported in APR (FOB Value)	Figures as per Customs Records	Difference if any	Reason for Difference/Remark
(1)	(2)	(3)	(4)	(5)
2020-21 To 2024-25	0.00	0.00	0.00	--

BLUT (Rs.in Cr.)

1	Value of BLUT Executed (Duty foregone) (including for CG/ Raw Material/ Services)		
	Value of Additional BLUT executed		
	<ul style="list-style-type: none"> Year: Date of acceptance BLUT amount: 		
	TOTAL value of BLUT Executed		
		Date of Acceptance	BLUT Amount
		17.03.2020	17.55 Crore
		Total	17.55 Crore

2	Total Duty Foregone on goods & services procured Category Wise: Year Wise:	FY	Goods Imported & Indigenous	Services Imported & Indigenous
		20-21	2.07	0.00
		21-22	0.51	0.00
		22-23	0.17	1.54
		23-24	0.46	2.31
		24-25	0.05	2.23
		Total	3.26	6.08
(d)	Employment made as on date (31.03.2025) (as on end of block period/ year up to which monitoring is being done)	Men: 251 Women: 138 Total No Employment :389 The unit submitted a declaration for the above staff strength dated 31.03.2025		
(e)	Details of Pending Foreign Remittance beyond Permissible period, if any (as on 31.03.2025) To cross-check the same and verify whether necessary permission from AD Bank/ RBI has been obtained.	Except 28 Invoices pertaining to the period 2024-25, No other foreign remittance is pending.		
(f)	Whether all Softex has been filed for the said period. If no, details thereof. SO to also check whether unit has obtained Softex condonation from DC office / RBI and if approved, whether they have filed such pending Softex.	All SOFTEX forms are filled and Certified		
(g)	Whether all Softex has been certified, if so till which month has the same been certified. If not, provide details of the Softex and reasons for pendency.	Yes		
(h)	Whether unit has filed any request for Cancellation of softex	Yes.		

(i)	Whether any Services provided in DTA/SEZ/EOU/STPI etc. against payment in INR in r/o IT/ITES Unit during the period. If yes, details thereof (year wise details to be provided)	Yes.		
		Sr No	FY	Amount In Crores
		1	2020-21	0.00
		2	2021-22	0.00
		3	2022-23	0.00
		4	2023-24	0.00
		5	2024-25	6.92
		Total		6.92
(j)	SO to verify and certify whether the unit has updated the BLUT ledger Module in SEZ Online.	NA		
(k)	Has the unit cleared any Capital Goods procured duty free in DTA against Payment of Duty, or otherwise? Full details to be provided along with value of assets and duty discharged	No		
(l)	Is the unit sharing any of their infrastructure with other units or are utilizing the infrastructure of another unit in the same or other SEZ. If so, details thereof, including the details of the unit with whom the sharing is being made, and the payment terms If approval for sharing of common infrastructure has been obtained from UAC/DC office, the date of UAC/ Approval letter to be indicated	No		
(m)	Whether all DSPF for services procured during the said monitoring period under consideration has been filed by the unit and whether the same has been processed for approval by the SO Office.	Yes		
(n)	Whether unit has filed all DTA procurement w.r.t. the goods procured by them during the monitoring period for the relevant period: If no, details thereof	Yes		
(o)	Details of the request IDs pending for OOC in respect of DTA procurement on the date of submission of monitoring report	No		

(p)	<p>Has the unit set up any cafeteria/ canteen/ food court in unit premises?</p> <p>If yes, whether permission from UAC/DC office has been issued, or otherwise.</p> <p>Whether unit has availed any duty paid goods/services for setting up such facility?</p> <p>If yes, whether unit has discharged such duty/ tax benefit availed? details to be given including amount of duty/ tax recovered or yet to be recovered</p>	<p>Yes. Approval Obtained vide UAC dated 23.03.2021 vide F.No. SEEPZ-SEZ/EKIPL-SEZ/ML/47/2019-20/693 Dated: 04-08-2021.</p> <p>The unit submitted the worksheet for the indigenous goods used in cafeteria valued at Rs. 2,18,630/- and have agreed to discharge duty/tax benefit availed of Rs. 39,353/- at the earliest.</p>
(q)	Whether any violation of any of the provisions of law has been noticed/ observed by the Specified Officer during the period under monitoring.	NA

e. **Recommendation:**

- The Unit has achieved export revenue of **Rs. 35.58 Crores** as against the projected export of **Rs 902.94 Crores** and achieved positive NFE of **Rs. 33.28 Crores** which is 93.52 % on cumulative basis in 5 Years of 1st Block Period i.e. 2020-21 to FY 2024-25.
- As per SO report the unit has achieved employment of **389** employees (Men-251, Women-138)
- As per the SO report, it is observed that the Unit has provided services in DTA against payment received in INR during the monitoring period as follows:

FY	Amt in INR in Crores.
2024-25	6.92
TOTAL	6.92

Since providing of “Services” in DTA against payment received in INR does not qualify as ‘Services’ as per definition given in Section 2(z) of the SEZ Act, 2005, The unit has made violation of various provision of SEZ Act / Rules and under Foreign Trade (Development and Regulation) Act, 1992. Show Cause Notice may be issued to the Unit.

- The Unit is required to refund the duty benefit availed for setting up of cafeteria.

Approval committee may kindly monitor the performance of the Unit for 5 Years of 1st Block Period i.e. 2020-21 to FY 2024-25, in terms of Rule 54 of SEZ Rules, 2006. in terms of Rule 54 of SEZ Rules, 2006
