

 सत्यमेव जयते	भारतसरकार/ Government of India वित्तमंत्रालय /Ministry of Finance आयुक्त सीमाशुल्क एन.एस.-II कार्यालय Office of Commissioner of Customs NS-II जवाहरलालनेहरुकस्टमहाउस, न्हावाशेवा, जिला- रायगढ़, महाराष्ट्र - 400 707 Jawaharlal Nehru Custom House, NhavaSheva, Dist- Raigad, Maharashtra - 400 707	
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F.No. CUS/ASS/MISC/248/2025-CEAC

Date: 28.03.2025

F.NO. SG/INV-128/2022-23/SIIB(X) JNCH

SCN No. 1273/2025-26/ADC/CEAC(NS-II) CAC/JNCH

Date of Issue - 11.11.2025

SHOW CAUSE NOTICE

DIN: 20251178NT0000222972

Subject: Investigation into attempted export of goods under Shipping Bills no. 4410372, 4410237, 4410235, 4412784 all dated 24.09.2022 by the exporter M/s Jodas Expoin Pvt Ltd (IEC: 0509067654) -reg.

M/s Jodas Expoin Pvt Ltd (IEC: 0509067654) having registered address at 3rd Floor, NSL Centrum, Plot No. S-1, Sy No: 1043 & 1048, KPHB Phase-III, Kukatpally, Hyderabad-500072 (hereinafter called as "the Exporter") has filed 04 Shipping Bills no. 4410372, 4410237, 4410235, 4412784 dated 24.09.2022 (**RUD-I**) through their authorized CB M/s Rosemount Shipping India Pvt. Ltd. (11/1277). (Hereinafter referred to as 'Customs Broker') for the export of -"Pharmaceutical items". The total FOB value of the shipping bills is Rs. 8, 14,38,209/- and destined for Russia. The items along with description and incentive claimed in the S/Bills are as below:

Table-A

Shipping Bill No./ Date	Invoice No	Description	No of Cartons	FOB (INR)	DBK Claimed (INR)
4410372 Dated 24.09.2022	90204146	Capecitabine Tablets USP 500mg (120 Tablets* 1 Bottle)	30	2,84,73,660/-	3,70,157/-
4410237 Dated 24.09.2022	90204145	Capecitabine Tablets USP 500mg (120 Tablets* 1 Bottle)	30	2,84,73,660/-	3,70,157/-
4410235 Dated 24.09.2022	1210000002	Fluconazole infusion BP 2mg/ml 100 ml/PP Bottle	296	1,89,82,440/-	2,46,771/-
4412784 Dated 24.09.2022	1210000003	Paracetamol Infusion BP 10MG/- 100 ml/PP Bottle	790	55,08,449/-	71,609/-
Total			1146	8,14,38,209/-	10,58,694/-

2. Thereafter, the goods were marked to docks for examination; however, during scrutiny of the documents, docks officer observed that the exporter has filed above mentioned shipping bills to export items as mentioned in above table to related consignee namely M/s OOO "Jodas Expoin", Russia. Prima facie the goods attempted to be exported appeared to be overvalued. Exporter vide letter dated 29.09.2022 in his reply stated that they are supplying the goods as per purchase order. To ascertain the valuation of the said goods data of contemporary exports of similar goods was retrieved from ICES 1.5. It was

 सत्यमेव जयते	भारतसरकार/ Government of India वित्तमंत्रालय /Ministry of Finance आयुक्त सीमाशुल्क एन.एस.-II कार्यालय Office of Commissioner of Customs NS-II जवाहरलालनेहरूकस्टमहाउस, न्हावाशेवा, जिला- रायगढ़, महाराष्ट्र - 400 707 Jawaharlal Nehru Custom House, NhavaSheva, Dist- Raigad, Maharashtra – 400 707	
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observed that item “Capecitabine Tablets USP 500mg” was exported by another exporter M/s Alken Laboratories Ltd. there was a huge difference between unit prices of export between M/s Jodas Expoim Pvt. Ltd. & M/s Alken Laboratories Ltd. Online market price of other products i.e. Fluconazole infusion BP and Paracetamol Infusion BP found to be very low as compared to that declared in shipping bill.

2.1 After retrieving data from ICES 1.5 by dock’s staff, it was observed difference in price in item no. i.e. Capecitabine Tablets USP 500 mg, which is tabulated as below:

(i) Item No. 1.-Capecitabine Tablets USP 500mg (through ICES 1.5)

Sr. No.	Exporter	Item Name	Country of export	Per Unit PMV (in Rs.)	Difference
1	M/s Jodas Expoim Pvt Ltd.	Capecitabine Tablets USP 500mg	Russia	10,440.34	8359.42
2	M/s Alkem laboratories	Capecitabine Tablets USP 500mg	USA	2080.92	

(ii) Item No. 02- Paracetamol Infusion BP 10MG/-100 ml/PP Bottle (through online price comparisons of prices with similar products available with other brands available in India)

Sr. No.	Exporter	Item Name	Per Unit PMV (in Rs.)	Difference
1	M/s Jodas Expoim Pvt Ltd	Paracetamol Infusion BP 10MG/ -100 ml/PP Bottle	76.76	28.26
2	Recure Remedies (local market price on India mart)	Paracetamol Infusion BP 10MG/ -100 ml/PP Bottle	48.50	

(iii) Item No. 03- Fluconazole Injection USP 2 mg/ml (through online price comparisons of prices with similar products available with other brands available in India)

Sr. No.	Exporter	Item Name	Per Unit PMV (in Rs.)	Difference
1	M/s Jodas Expoim Pvt Ltd	Fluconazole Injection USP 2 mg/ml	705	635
2	Cipla (local market price on India mart)	Fluconazole infusion BP 2mg/ml-100ml/PP Bottle	70	

Price in item no. 03 is not comparable as one item in injection form and other is infusion form and price in item no. 02 difference in price is not huge.

2.2 In view of above, the dock’s officer observed that the exporter has overvalued the goods to claim higher export incentives & IGST refund. Therefore the case file has been forwarded to SIIB(X) by docks with approval of the Competent Authority for determination of valuation as per Customs Valuation of Export Goods Rules, 2007 as goods were attempted to be exported appeared

to be overvalued for sole purpose of claiming higher export incentives.

3. The Goods pertaining to Shipping Bills no. 4410372, 4410237, 4410235, 4412784 all dated 24.09.2022 were examined under panchanama dated 12.10.2022 (**RUD-II**) in presence of the exporter and G card holder of CB M/s Rosemount Shipping India Pvt. Ltd. (11/1277). During the examination goods were found declared in terms of quantity and description. The goods covered under above mentioned shipping bills were seized under section 110 of Customs Act, 1962 on 02.11.2022.

4. The exporter M/s Jodas Expoim Pvt Ltd (IEC: 0509067654) submitted a letter dated 03.11.2022 requesting for the provisional release of the subject consignment covered under the Shipping Bills no. 4410372, 4410237, 4410235, 4412784 dated 24.09.2022 for export. The request of the exporter for provisional release of the consignment for the export was accepted by the competent authority on execution of Bond of 100% of the FOB value of the goods and Bank Guarantee of Rs. 25,00,000/-. The goods were allowed for provisional release for export on 14.11.2022 (**RUD-III**).

5. Statement of Shri. Piyush Gupta, DGM-Operations (TPM) of M/s Jodas Expoim Pvt. Ltd. was recorded on 28.11.2022 (**RUD-IV**) wherein inter-alia stated that:

- He had submitted similar products rates of other competitors, which are registered with the government of Russia which same can be also check on Russian Govt. Website (Importing Country), the link for the same is <https://grls.rosminzdrav.ru/Default.aspx> which he had accessed here itself and copy of print outs of comparative price chart of same items are submitted to this office with his dated signature.
- Price are at par with the similar product registered with the govt of Russia and BRCS of previous export has been realized and proof in this regard has been submitted by him. He stated that transaction value between us is not influenced due to our relationship; they do not have any Special Valuation Branch order issued from the Government of Russia in the regard.
- They are leading exporter among Indian Pharma companies who are exporting to Russia and they are only supplying to government of Russia through floated tender at registered and decided by the government of Russia on which price, they are bound to sell directly to hospitals only. They are not in retail business in Russia. Pharma business is very competitive and to develop one product is very cumbersome and lengthy process and sometimes it takes years after initial conception, afterwards there are mandatory trials and approvals with the statutory body for approval of human trials and other statutory compliances has to be taken before make it available in the market. This is general practice in pharma business to cover all costs, which were incurred to develop one product from inception to final stage along with keeping in view of in which market the product is to be sold.
- There is no guarantee whether the product is going to sellable or not or it will be approved with the other government regulatory bodies such as Russian govt. Hence, the prices are being fixed after taking all the other expenses apart from other expenses incurred on production, R&D etc.

6. Statement of Shri. Piyush Gupta, DGM-Operations (TPM) of M/s Jodas Expoin Pvt. Ltd. was recorded on 06.10.2023 (**RUD-V**) wherein he inter-alia stated that:

- They are an exporter, with Russian GMP certificate (our facility audited by Russian Ministry of Health). However, they are not registered with the Russian Govt. their consignee is a registered firm with the Russian Govt.
- The consignee OOO Jodas, Russia is our related party, wherein Mr. Shashi Shankar Prasad is the common Director. They have furnished their firm audited balance sheet in support of the same.
- Apart from my previous submission, they would like to add that they have realized all the forex pertaining to the shipments under S/Bills No. 4410372, 4410237, 4410235, 4412784 dated 24.09.2022, they which items are Capecitabine Tablets USP 500mg (120 tablets *1 bottle), Fluconazole infusion BP 2mg/ml-100ml/pp Bottle and Paracetamol Infusion BP 10MG/- 100ml/PP Bottle.

6.1 The exporter submitted that Russian Pharma Market is 20 Billion USD, and it imports in terms of value 65% which translate into 13 Billion USD, Institution sales of 60% i.e. 13 Billion comes to 7 billion USD which is funded by Russian Government which is not supported by any private players. Russian Pharma Regularity landscape:-

- i. Every Pharmaceuticals product has to be registered with agency of the Russian Ministry of Health.
- ii. Product registration is a cumbersome process which goes through pharma copial and pharma cological committees, requiring the time line of 16 to 18 months and about USD 3,00,000.
- iii. Every Lifesaving drug as per the Russian essential medicines list should have price registrations before its commercialization.
- iv. Every company operating in the institutional market segment should have a pricing and supply strategy develop before the registration of the product.
- v. Price advantage given to Russian local manufacturers if more than two is present in Russia. i.e. preferential pricing advantage is given to local players and foreign companies like JEPL shall factor in before supply to its distributors for subsequent adjustments.
- vi. All the lifesaving drugs for institution are procured through online tendering, which creates further complexities for developing the pricing strategies.

6.2 JEPL (M/s Jodas Expoin Pvt Ltd) market access Strategy:-

- i. In order to have access to market, JEPL selects, distributors using the criteria such as sustainability of the distributions, infrastructure in place and wiliness to promote products of JEPL. All this service come at higher prices which has to be compensated by JEPL to Distributor.
- ii. Since market is very dynamic and competitive, JEPL manages its profitability through portfolio approach. It mean JEPL draws strategies for each and every product and bundles it as a product. In such case it's very difficult for JEPL to have uniform mark ups and hence the difference.
- iii. When distributors import a lifesaving drug in Russia, it has to make affront payment for custom duty of about 5 to 10% of the product along with VAT of 10%, besides other customs handling and logistic charges.

- iv. Russian customs department does not allow to import lifesaving below its registered price.
- v. Maximum mark allowed is 10%.

6.3 Any product should go through many phases

- i. Product development (Preparation of Normative documents as per the Russian statutory guidelines and requirements). Products like Flucanazole costed JEPL around INR One Crore. This cost is not reflected in product costing however same appears in profit and loss.
- ii. Manufacturing site audits from Russia MOH for getting the GMP for subsequent product registrations which requires around 300000 USD per product. On top of this additional expenditures in the form of basic infrastructure, equipment's, administrative manpower quality control infrastructure etc which are not directly absorbed by particular product however same is reflected in the Profit and loss account of the company in the form of Financials which are incurred for making the facilities Russian GMP Compliant.
- iii. JODAS employs around 170 people in its quality department, 122 people in its R & D department, and 150 people in engineering department. Since Jodas Site is EURO and Russian GMP certified, it requires huge cost, for maintaining the facility as per EURO and Russian GMP. Over all employee cost is Rs. 25 Crores per year.
- iv. Further under income tax, transfer pricing JEPL will face transfer pricing notices for charging less margin while making sales to related party.

Operating in a volatile market like Russia has its own challenges, where cost of distribution, supply chain, timely recovery etc. compels JEPL to maximize its mark ups where there are possibilities, without creating noncompliance further.

7. In order to establish the valuation under Rule 4 of the Customs Valuation (Determination of Value of Export Goods) Rules, 2007, of the goods exported by the exporter M/s Jodas Expoin Pvt. Ltd., contemporary exports of identical/similar products was looked for in the ICES 1.5 system. No contemporary export was found in respect of 02 items i.e. Flucanazole 2 mg per ml- 100 ml and Paracetamol 10 Mg 100 ML. 01 export of identical item was found in respect of Capecitabine Tablets USP 500 mg 120 tablets* 1 Bottle. The exporter in that case was M/s Alkem Laboratories. However, the country of export in that case was USA which is different from the instant case i.e. Russia. Since regulatory compliances and other factors are different in both these countries, the transaction value of both these Shipping Bills cannot be compared.

8. Proceeding sequentially, under Rule 5 of the CVR, 2007, the exporter has submitted that cost sheet of each of the three pharma products duly certified by R R K & Associates, Chartered Accountants, having Firm No. 0097855, which is re-produced hereunder for each of the three products:

1. Product Name: Fluconazole 2 mg per ml-100 ml:

Semi-finished goods purchase price	\$0.32
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Total material cost	\$0.38
Overhead	\$6.28
Cost of production	\$6.67

2. Product Name: Capecitabine Tablets USP 500 mg (120 Tablets*1 Bottle):

API	\$0.14
Total material cost	\$0.14
Overhead	\$0.73
Cost of production	\$0.87

3. Product Name: Paracetamol 10 Mg 100 ml:

Semi-finished goods purchase price	\$0.31
Total material cost	\$0.37
Overhead	\$0.48
Cost of production	\$0.85

8.1. Price Comparison of price as mentioned in the S/Bills with Cost Sheet are certified by M/s RKR & Associates, Chartered Accountants having firm No. 0097855 (**RUD-VI**) given by the Exporter M/s Jodas Expoin Pvt ltd to Customer 000 JODAS-Russia. Price comparison of price as mentioned in the shipping bills with cost sheet given by the exporter.

Sr. No.	Item Name	Per Unit Price as per S/Bills (in USD)	CIF Cost price in USD	Margin
1.	Fluconazole 2 mg per ml- 100 ml	8.25	6.67	24%
2.	Paracetamol 10 Mg 100 ML	0.95	0.85	12%
3.	Capecitabine Tablets USP 500 mg 120 tablets* 1 Bottle	121.0	104.20	16%

9. The exporter has also submitted that the items which have been exported by them are at par with the similar products registered with the govt of Russia. To corroborate the submission, the exporter has provided the link of Russian government website which is <https://grls.rosminzdrav.ru/Default.aspx>. The website was accessed and the details as retrieved from the said website shows the current prices of the three products in the Russian market. It is seen that the exporter has exported these products over the prevailing prices as set by the Russian Government.

10. The exporter has also furnished the e-BRC (**RUD-VII**) in respect of the Shipping Bills which were provisionally released by this office. Further, the status of all the shipping bills filed by the exporter was assessed from the ICES 1.5 system wherein it was seen that Forex has been realised in all the shipping bills filed by the exporter.

11. Form the foregoing, it appears that the declared value of the three items by the exporter is the transaction value and it has not been influenced by the relationship between the exporter and the overseas buyer. The exporter a manufacture exporter accredited with GMPEU and Russia and having 570.28 crores of total revenue and after perusal of balance sheet, wherein profit

margin which is 12% to 24% is in line of balance sheet, wherein profit after is 18%. Hence , after perusal of the submission given by the exporter, it appears that valuation of the aforesaid goods is fair considering the expenditure incurred in abroad as discussed above.

12. Past Exports: On perusal of the ICES 1.5 system, it is seen that there are

138 past Shipping Bills filed wherein the export incentives claimed by the exporter proceeds. In these shipping bills BRC have either not been realized or partially realized (the partially realised part is less than 1% of FOB value). The details of such Shipping Bills are as under:-

Table-II

Serial No.	SB No.	SB Date	FOB to be realized (in FC)	Declared FOB (In Rs.)	Claimed DBK (In Rs.)	Claimed Rodtep (In Rs.)	IGST (In Rs.)	FOB Actually Realised (in FC)	% FOB actual realized	% of Short realization	Differential DBK	Differential Rodtep
1	4804887	4-Apr-13	49807	2689578	53757	0	0	0	0.00	100.00	53757	0
2	4808454	4-Apr-13	226992	12257568	245081	0	0	0	0.00	100.00	245081	0
3	4811084	4-Apr-13	14368	775863	15504	0	0	0	0.00	100.00	15504	0
4	5616260	27-May-13	123165	6693993	133768	0	0	0	0.00	100.00	133768	0
5	5643562	28-May-13	220800	12000470	240009	0	0	0	0.00	100.00	240009	0
6	8287698	2-Nov-13	93746	5737252	97246	0	0	0	0.00	100.00	97246	0
7	8297178	4-Nov-13	69736	4267813	72553	0	0	0	0.00	100.00	72553	0
8	8297626	4-Nov-13	183785	11247648	191019	0	0	0	0.00	100.00	191019	0
9	9261035	31-Dec-13	31445	1946430	33089	0	0	0	0.00	100.00	33089	0
10	9261450	31-Dec-13	109883	6801776	115455	0	0	0	0.00	100.00	115455	0
11	9262133	31-Dec-13	112320	6952627	118195	0	0	0	0.00	100.00	118195	0
12	9813080	1-Feb-14	491599	30085886	511074	0	0	0	0.00	100.00	511074	0
13	9813217	1-Feb-14	32135	1966686	33411	0	0	0	0.00	100.00	33411	0
14	9813415	1-Feb-14	113799	6964493	118252	0	0	0	0.00	100.00	118252	0
15	9817907	1-Feb-14	56732	3471992	59024	0	0	0	0.00	100.00	59024	0
16	2127671	9-Nov-16	129489	8533352	162134	0	0	46,102	35.60	64.40	104409	0
17	7098982	1-Jul-17	24419	1463261	21949	0	0	23,252	95.22	4.78	1049	0
18	5861872	28-Jun-18	51029	3439366	51590	0	419281	50,218	98.41	1.59	820	0
19	5899407	29-Jun-18	57376	3867136	0	0	468198	56,061	97.71	2.29	0	0
20	6470065	26-Jul-18	70944	4817081	72256	0	584690	70,129	98.85	1.15	830	0
21	7058633	22-Aug-18	83046	5763406	86451	0	708413	81,029	97.57	2.43	2100	0
22	7058673	22-Aug-18	110152	7644522	0	0	931695	108,428	98.43	1.57	0	0
23	7570165	14-Sep-18	104327	7391601	110874	0	916516	100,855	96.67	3.33	3690	0
24	7763568	23-Sep-18	46330	3333465	0	0	400784	45,521	98.25	1.75	0	0
25	8039558	4-Oct-18	96979	6977603	104664	0	888439	91,057	93.89	6.11	6391	0
26	8108421	8-Oct-18	55904	4075373	0	0	497897	54,892	98.19	1.81	0	0
27	8133487	9-Oct-18	263805	19231367	288471	0	2312621	0	0.00	100.00	288471	0
28	9459421	8-Dec-18	84246	5901426	88521	0	727297	65,503	77.75	22.25	19694	0
29	9591114	12-Dec-18	38852	2721567	40824	0	330860	38,344	98.69	1.31	534	0
30	9591120	12-Dec-18	179437	12569554	188543	0	1533044	176,499	98.36	1.64	3087	0
31	9591121	12-Dec-18	54508	3818316	0	0	465020	53,697	98.51	1.49	0	0
32	3299404	5-Apr-19	4449	301416	4521	0	40600	3,948	88.74	11.26	509	0

33	3345047	8-Apr-19	111176	7532200	0	0	918624	109,093	98.13	1.87	0	0
34	3912798	19-Jul-20	50159	3731817	48514	0	456828	0	0.00	100.00	48514	0
35	4234940	3-Aug-20	197464	14691335	190987	0	178560 0	0	0.00	100.00	190987	0
36	4234941	3-Aug-20	450119	33488871	435355	0	402652 8	0	0.00	100.00	435355	0
37	4234942	3-Aug-20	90984	6769179	87999	0	817805	0	0.00	100.00	87999	0
38	4530129	17-Aug-20	482313	35691165	463985	0	428815 2	0	0.00	100.00	463985	0
39	4700849	25-Aug-20	49691	3684583	47900	0	0	0	0.00	100.00	47900	0
40	4829600	30-Aug-20	100582	7458136	96956	0	0	0	0.00	100.00	96956	0
41	4829601	30-Aug-20	49991	3706823	48189	0	0	0	0.00	100.00	48189	0
42	4829603	30-Aug-20	92683	6872459	89342	0	0	0	0.00	100.00	89342	0
43	5160420	14-Sep-20	181435	13135906	170767	0	158528 9	0	0.00	100.00	170767	0
44	5160440	14-Sep-20	43892	3177768	0	0	385747	0	0.00	100.00	0	0
45	5176066	14-Sep-20	62288	4509679	0	0	548213	0	0.00	100.00	0	0
46	5176263	14-Sep-20	28195	2041291	0	0	253690	0	0.00	100.00	0	0
47	5178737	15-Sep-20	28595	2070246	0	0	257165	0	0.00	100.00	0	0
48	8550002	10-Feb-21	31509	2271805	29533	0	0	0	0.00	100.00	29533	0
49	8550025	10-Feb-21	31858	2296936	29860	0	0	0	0.00	100.00	29860	0
50	8550062	10-Feb-21	25331	1826368	23743	0	0	0	0.00	100.00	23743	0
51	8584873	11-Feb-21	31852	2296511	29855	0	0	0	0.00	100.00	29855	0
52	8584876	11-Feb-21	31848	2296263	29851	0	0	0	0.00	100.00	29851	0
53	8584898	11-Feb-21	31590	2277622	29609	0	0	0	0.00	100.00	29609	0
54	9406370	16-Mar-21	14502	1047060	13612	0	0	0	0.00	100.00	13612	0
55	9415679	17-Mar-21	12762	921416	11978	0	0	0	0.00	100.00	11978	0
56	9416180	17-Mar-21	32656	2357767	30651	0	0	0	0.00	100.00	30651	0
57	9744837	30-Mar-21	22725	1627144	21153	0	0	0	0.00	100.00	21153	0
58	2583845	22-Jun-21	19176	1396970	18161	0	180785	0	0.00	100.00	18161	0
59	2583851	22-Jun-21	19216	1399883	18198	0	181134	0	0.00	100.00	18198	0
60	2583897	22-Jun-21	19216	1399883	18198	0	181134	0	0.00	100.00	18198	0
61	2699619	26-Jun-21	49834	3630440	47196	0	473336	0	0.00	100.00	47196	0
62	2824146	1-Jul-21	24525	1786627	23226	0	236296	0	0.00	100.00	23226	0
63	3019536	9-Jul-21	50894	3745824	48696	0	483155	0	0.00	100.00	48696	0
64	3862025	14-Aug-21	155495	11413308	148373	0	137250 7	0	0.00	100.00	148373	0
65	3862046	14-Aug-21	332836	24430187	317592	0	293659 8	0	0.00	100.00	317592	0
66	4305032	2-Sep-21	152740	11226397	0	0	135492 8	0	0.00	100.00	0	0
67	4305039	2-Sep-21	208184	15301550	198920	0	184095 5	0	0.00	100.00	198920	0
68	4305104	2-Sep-21	152670	11221253	145876	0	135387 0	0	0.00	100.00	145876	0
69	5321733	15-Oct-21	321437	23786317	309222	0	0	0	0.00	100.00	309222	0
70	5321738	15-Oct-21	219925	16274482	211568	0	197552 3	0	0.00	100.00	211568	0
71	6657792	10-Dec-21	17762	1317958.21	0	7907	0	0	0.00	100.00	0	7907
72	7867375	31-Jan-22	140742	10358602	134662	0	126097 8	0	0.00	100.00	134662	0
73	7867376	31-Jan-22	281877	20746178	269700	0	252543 3	0	0.00	100.00	269700	0
74	7912779	2-Feb-22	7042	518289.4	6738	0	79877	0	0.00	100.00	6738	0
75	7912787	2-Feb-22	110023	8097658.8	105270	0	100727 2	0	0.00	100.00	105270	0
76	7912788	2-Feb-22	73114	5381202.88	69956	0	658256	0	0.00	100.00	69956	0
77	7912791	2-Feb-22	186658	13738045	178595	0	165335 0	0	0.00	100.00	178595	0

78	7912797	2-Feb-22	73756	5428411.64	70569	0	664806	0	0.00	100.00	70569	0
79	8145256	11-Feb-22	3347	247850.4	3222	0	0	0	0.00	100.00	3222	0
80	8145292	11-Feb-22	353996	26213381.75	340774	0	3156974	0	0.00	100.00	340774	0
81	8145953	11-Feb-22	225026	16663153.8	216621	0	2002247	0	0.00	100.00	216621	0
82	8169141	12-Feb-22	52266	3870328.5	0	20516	0	0	0.00	100.00	0	20516
83	8348061	19-Feb-22	115921	8618758.73	0	68952	0	0	0.00	100.00	0	68952
84	1706430	27-May-22	166962	12839399	166912	0	1559532	0	0.00	100.00	166912	0
85	1706435	27-May-22	121673	9356622	121636	0	1133198	0	0.00	100.00	121636	0
86	1733762	28-May-22	373116	28692640	373004	0	0	0	0.00	100.00	373004	0
87	1733766	28-May-22	138975	10687147.4	138933	0	0	0	0.00	100.00	138933	0
88	1733770	28-May-22	352420	27101096	352314	0	0	0	0.00	100.00	352314	0
89	1733773	28-May-22	71509	5499017.5	71487	0	0	0	0.00	100.00	71487	0
90	1746513	30-May-22	378754	29126207	378641	0	3542076	0	0.00	100.00	378641	0
91	2081448	13-Jun-22	137069	10526904	136850	0	1277338	0	0.00	100.00	136850	0
92	2081454	13-Jun-22	68234	5240404	68125	0	642816	0	0.00	100.00	68125	0
93	2081458	13-Jun-22	290535	22313055	290070	0	2701210	0	0.00	100.00	290070	0
94	2081494	13-Jun-22	137069	10526904	136850	0	1277338	0	0.00	100.00	136850	0
95	2081501	13-Jun-22	146167	11225630	145933	0	1360282	0	0.00	100.00	145933	0
96	2081561	13-Jun-22	35677	2739977.64	35620	0	0	0	0.00	100.00	35620	0
97	2244120	20-Jun-22	39499	3051269	0	9235	0	0	0.00	100.00	0	9235
98	3323501	5-Aug-22	32735	2571334	0	0	0	0	0.00	100.00	0	0
99	4283335	19-Sep-22	276478	21758822	282865	0	0	0	0.00	100.00	282865	0
100	4410235	24-Sep-22	241200	18982440	246772	0	0	0	0.00	100.00	246772	0
101	4412792	24-Sep-22	99960	7866859.87	0	78669	0	0	0.00	100.00	0	78669
102	5303073	7-Nov-22	39669	3256792.88	0	18128	0	0	0.00	100.00	0	18128
103	5345953	9-Nov-22	20732	1411471.41	0	19761	0	0	0.00	100.00	0	19761
104	5346722	9-Nov-22	14966	1228687.25	0	17202	0	0	0.00	100.00	0	17202
105	5379011	10-Nov-22	129631	10642734.66	0	79644	0	0	0.00	100.00	0	79644
106	5720738	25-Nov-22	192788	15596564.57	0	155965	0	0	0.00	100.00	0	155965
107	5720988	25-Nov-22	98756	7989332.09	0	78676	0	0	0.00	100.00	0	78676
108	5739010	26-Nov-22	245955	19897759.5	258671	0	2426563	0	0.00	100.00	258671	0
109	5832674	30-Nov-22	43069	3484295.04	0	5974	0	0	0.00	100.00	0	5974
110	5847768	1-Dec-22	32964	2666783.56	0	14429	0	0	0.00	100.00	0	14429
111	6777574	7-Jan-23	206413	16915504.38	219902	135324	2033998	0	0.00	100.00	219902	135324
112	6777588	7-Jan-23	136776	11208793.2	145714	89670	1372041	0	0.00	100.00	145714	89670
113	6777959	7-Jan-23	207788	17028185.63	221366	136225	2047495	0	0.00	100.00	221366	136225
114	6778077	7-Jan-23	121865	9986836.75	129829	79895	1208988	0	0.00	100.00	129829	79895
115	6778093	7-Jan-23	184595	15127560.25	196658	121020	1824745	0	0.00	100.00	196658	121020
116	2203074	4-Jul-23	175927	14311637.86	0	840	0	0	0.00	100.00	0	840
117	2368850	11-Jul-23	66409	5415662.11	0	7815	0	0	0.00	100.00	0	7815
118	2905157	2-Aug-23	53655	4356804.68	0	11438	0	0	0.00	100.00	0	11438
119	3016565	7-Aug-23	220552	18063232.4	0	0	2170965.89	0	0.00	100.00	0	0

120	3035041	8-Aug-23	24905	2039708.85	0	39	0	0	0.00	100.00	0	39
121	4490515	9-Oct-23	11457	944021.37	0	6839	0	0	0.00	100.00	0	6839
122	4846259	23-Oct-23	199379	16438772	0	0	198473	6.4	0	0.00	100.00	0
123	4846264	23-Oct-23	167894	13842855.9	0	0	168278	7.35	0	0.00	100.00	0
124	5149582	5-Nov-23	265668	21891040	0	0	263972	5.2	0	0.00	100.00	0
125	5610370	27-Nov-23	41140	3387907.8	0	0	426783	82	0	0.00	100.00	0
126	5611423	27-Nov-23	235535	19396343	0	0	236970	3.6	0	0.00	100.00	0
127	5861018	7-Dec-23	10381	854835.47	0	4620	0	0	0.00	100.00	0	4620
128	7009150	25-Jan-24	145616	11991496.1	0	0	144452	6.06	0	0.00	100.00	0
129	7009153	25-Jan-24	235208	19369405.1	0	0	233481	0.26	0	0.00	100.00	0
130	7012598	25-Jan-24	90010	7412293.56	0	0	895404	07	0	0.00	100.00	0
131	7015272	25-Jan-24	200030	16472432.4	0	0	198580	0.25	0	0.00	100.00	0
132	7015309	25-Jan-24	181139	14916809	0	0	179891	9.28	0	0.00	100.00	0
133	7333454	7-Feb-24	117939	9694603	0	0	121401	1.8	0	0.00	100.00	0
134	7960985	1-Mar-24	367998	30249444	0	0	364678	0	0	0.00	100.00	0
135	8118433	7-Mar-24	280310	23041507	0	0	277988	5	0	0.00	100.00	0
136	8311888	14-Mar-24	144467	11846274	0	0	144085	5	0	0.00	100.00	0
137	8666440	27-Mar-24	220082	18101744	0	0	217390	2	0	0.00	100.00	0
138	8750547	30-Mar-24	74637	6138894	0	0	742421	0	0.00	100.00	0	0
Total				129842793	0	1220755	108268	047			1141834	11687
						9	1168783				5	83

12.1 The 1.5 system shows that no foreign remittance has been received in the above mentioned shipping bills as mandated under FEMA regulations, by the exporter in any of the past shipments (Table-II). Further, as per Rule 18 (1) of the Customs and Central Excise Duties Drawback Rules, 2017, if an amount of drawback, RoDTEP and other export incentive has been paid to an exporter but the sale proceeds in respect of such export goods has not been realized or partially realized within the time allowed under the Foreign Exchange (FEMA), 1999, such drawback amount is recovered. Hence, the export incentives claimed by the exporter in all the Shipping Bills shall be demanded back alongwith applicable interest in terms of rule 18 of Customs and Central Excise Duties Drawback Rules, 2017 in terms of Notification No. 76/2021-Cus(N.T) dated 23.09.2021, 77/2021-Cus (N.T) dated 24.09.2021 & 25/2023-Cus (N.T) dated 01.04.2023 and section 28AAA read with section 28AA of the Customs Act, 1962 and thus, the goods exported vide past 138 shipping bills wherein foreign remittance have not been received or partially received as detailed at Table-II having FOB of Rs. 1,29,84,27,930/-, though not available for confiscation, appears liable to be confiscated under Section 113(ia) & 113(ja) of the Customs Act 1962.

13. RELEVANT LEGAL PROVISIONS

A. Customs Act, 1962

Section 50: Entry of goods for exportation. –

(1) The Exporter of any goods shall make entry thereof by presenting [electronically] [on the customs automated system] to the proper officer

in the case of goods to be exported in a vessel or aircraft, a shipping bill, and in the case of goods to be exported by land, a bill of export [in such form and manner as may be prescribed]:

Provided that the [Principal Commissioner of Customs or Commissioner of Customs] may, in cases where it is not feasible to make entry by presenting electronically [on the customs automated system], allow an entry to be presented in any other manner.]

(2) The Exporter of any goods, while presenting a shipping bill or bill of export, shall make and subscribe to a declaration as to the truth of its contents.

(3) The Exporter who presents a shipping bill or bill of export under this section shall ensure the following, namely:-

(a) the accuracy and completeness of the information given therein;

(b) the authenticity and validity of any document supporting it; and

(c) compliance with the restriction or prohibition, if any, relating to the goods under this Act or under any other law for the time being in force.

Section 113(ia): *Any goods entered for exportation under claim for drawback which do not correspond in any material particular with any information furnished by the Exporter or manufacturer under this Act in relation to the fixation of the rate of drawback under Section 75, shall be liable to confiscation;*

Section 113(ja): *any goods entered for exportation under claim of remission or refund of any duty or tax or levy to make a wrongful claim in contravention of the provisions of this Act or any other law for the time being in force;*

Section 114(iii): *Any person who, in relation to any goods, does or omits to do any act which act or omission would render such goods liable to confiscation under section 113, or abets the doing or omission of such an act, shall be liable, in the case of any other goods, to a penalty not exceeding the value of the goods as declared by the Exporter or the value as determined under this Act, whichever is the greater;*

Section 114AB. Penalty for obtaining instrument by fraud, etc.- *Where any person has obtained any instrument by fraud, collusion, wilful misstatement or suppression of facts and such instrument has been utilised by such person or any other person for discharging duty, the person to whom the instrument was issued shall be liable for penalty not exceeding the face value of such instrument.*

Section 28AA of the Customs Act, 1962 Interest on delayed payment of duty-

(1) Notwithstanding anything contained in any judgment, decree, order or direction of any court, Appellate Tribunal or any authority or in any other provision of this Act or the rules made there under, the person, who is liable to pay duty in accordance with the provisions of section 28, shall, in addition to such duty, be liable to pay interest, if any, at the rate fixed under sub-section (2), whether such payment is made voluntarily or after determination of the duty under that section. (2) Interest at such rate not below ten per cent. And not exceeding thirty-six per cent. per annum, as the Central Government may, by notification in the Official Gazette, fix, shall be paid by the person liable to pay duty in terms of section 28 and such interest shall be calculated from the first day of the month succeeding the month in which the duty ought to have been paid or from the date of such erroneous refund, as the case may be, up to the date of payment of such duty.

(3) Notwithstanding anything contained in sub-section (1), no interest shall be payable where,

(a) the duty becomes payable consequent to the issue of an order, instruction or direction by the Board under section 151A; and

(b) such amount of duty is voluntarily paid in full, within forty-five days from the date of issue of such order, instruction or direction, without reserving any right to appeal against the said payment at any subsequent stage of such payment.

Section 28AAA. Recovery of duties in certain cases.—(1) Where an instrument issued to a person has been obtained by him by means of — (a) collusion; or (b) willful mis-statement; or (c) suppression of facts, for the purposes of this Act or the Foreign Trade (Development and Regulation) Act, 1992 (22 of 1992), by such person or his agent or employee and such instrument is utilised under the provisions of this Act or the rules made or notifications issued thereunder, by a person other than the person to whom the instrument was issued, the duty relatable to such utilisation of instrument shall be deemed never to have been exempted or debited and such duty shall be recovered from the person to whom the said instrument was issued: Provided that the action relating to recovery of duty under this section against the person to whom the instrument was issued shall be without prejudice to an action against the importer under section 28.

Section 75A(2) of Customs Act, 1962: Where any drawback has been paid to the claimant erroneously or it becomes otherwise recoverable under this Act or the rules made there under, the claimant shall, within a period of two months from the date of demand, pay in addition to the said amount of drawback, interest at the rate fixed under section 28AA and the amount of interest shall be calculated for the period beginning from the date of payment of such drawback to the claimant till the date of recovery of such drawback.

B. Customs and Central Excise Duties Drawback Rules, 2017.

Rule 17: Repayment of erroneous or excess payment of drawback and interest. Where an amount of drawback and interest, if any, has been paid erroneously or the amount so paid is in excess of what the claimant is entitled to, the claimant shall, on demand by a proper officer of Customs repay the amount so paid erroneously or in excess, as the case may be, and where the claimant fails to repay the amount it shall be recovered in the manner laid down in sub-section (1) of section 142 of the Customs, Act, 1962.

Rule 18 (1): Where an amount of drawback has been paid to an exporter or a person utilized by him (hereinafter referred to as the claimant) but the sale proceeds in respect of such export goods have not been utilised by or on behalf of the exporter in India within the period allowed under the Foreign Exchange Management Act, 1999 (42 of 1999), including any extension of such period, such drawback shall, except under circumstances or conditions specified in sub-rule (5), be recovered

Foreign Trade (Development and Regulation) Act, 1992

Section 11:(1) No export or import shall be made by any person except in accordance with the provisions of this Act, the rules and orders made there under and the foreign trade policy for the time being in force.

Foreign Trade (Regulation) Rules, 1993

Rule 11: On the importation into, or exportation out of, any customs ports of any goods, whether liable to duty or not, the owner of such goods shall in the Bill of Entry or the Shipping Bill or any other documents prescribed under the Customs Act, 1962 (52 of 1962), state the value, quality and description of such goods to the best of his knowledge and belief and in case of exportation of goods, certify that the quality and specification of the goods as stated in those documents, are in accordance with the terms of the export contract entered into with the buyer or consignee in pursuance of which the goods are being exported and shall subscribe a declaration of the truth of such statement at the foot of such Bill of Entry or Shipping Bill or any other documents.

E.

Customs Valuation (Determination of Value of Export Goods) Rules, 2007

(A) RULE 3-Determination of the method of Valuation

(1) Subject to rule 8, the value of export goods shall be the transaction value.

(2) The transaction value shall be accepted even where the buyer and seller are related, provided that the relationship has not influenced the price.

(3) If the value cannot be determined under the provisions of sub-rule (1) and sub- rule (4), the value shall be determined by proceeding sequentially through rules 4 to 6.

(B) RULE 4. Determination of export value by comparison.

(1) "the value of the export goods shall be based on the transaction value of goods of like kind and quality exported at or about the same time to other buyers in the same destination country of importation or in its absence another destination country of importation adjusted in accordance with the provisions of sub-rule (2).

(2) In determining the value of export goods under sub-rule (1), the proper officer shall make such adjustments as appear to him reasonable, taking into consideration the relevant factors, including-

- (i) Difference in the dates of exportation,
- (ii) Difference in commercial levels and quantity levels,
- (iii) Difference in composition, quality and design between the goods to be assessed and the goods with which they are being compared,
- (iv) Difference in domestic freight and insurance charges depending on the place of exportation".

(C) RULE 5. Computed value method. - "If the value cannot be determined under Rule 4, it shall be based on a computed value, which shall include the following: -

- (a) Cost of production, manufacture or processing of export goods;
- (b) Charges, if any, for the design or brand;
- (c) An amount towards profit".

(D) RULE 6. Residual Method. -"Subject to the provisions of rule 3, where the value of the export goods cannot be determined under the provisions of rules 4 and 5, the value shall be determined using reasonable means consistent with the

principles and the general provisions of these rules provided that local market price of the export goods may not be the only basis for determining the value of export goods".

(E) **RULE 7. Declaration by the exporter.**-*"The exporter shall furnish a declaration relating to the value of export goods in the manner specified in this behalf.*

(F) **RULE 8. Rejection of declared value.** –

(a) "When the proper officer has reason to doubt the truth or accuracy of the value declared in relation to any export goods, he may ask the exporter of such goods to furnish further information including documents or other evidence and if, after receiving doubt about the truth or accuracy of the value so declared, the transaction value shall be deemed to have not been determined in accordance with sub-rule (1) of rule 3.

(b) At the request of an exporter, the proper officer shall intimate the exporter in writing the ground for doubting the truth or accuracy of the value declared in relation to the export goods by such exporter and provided a reasonable opportunity of being heard, before taking a final decision under sub-rule (1)".

14. Whereas, from the investigation, the following facts emerge that:

14.1 M/s Jodas Expoin Pvt Ltd (IEC: 0509067654) having registered address at 3rd Floor, NSL Centrum, Plot No. S-1, Sy No: 1043 & 1048, KPHB Phase-III, Kukatpally, Hyderabad-500072 (hereinafter called as "the Exporter") has filed 04 Shipping Bills no. 4410372, 4410237, 4410235, 4412784 all dated 24.09.2022 (RUD-I) through their authorized CB M/s Rosemount Shipping India Pvt. Ltd. (11/1277). (Hereinafter referred to as 'Customs Broker') for the export of -"Pharmaceutical items". The total FOB value of these 04 shipping bills is Rs. 8,14,38,209/- and destined for Russia.

14.2 The exporter has submitted CA certified cost sheet against the value declared in the shipping bills. The exporter also submitted the e-BRC for the subject shipping bills. Hence, the value for the subject shipping bill was determined as per Rule 5 of the Customs Valuation (Determination of value of export goods) Rules, 2007, which states that:

Computed value method. - *If the value cannot be determined under rule 4, it shall be based on a computed value, which shall include the following:-*

- (a) cost of production , manufacture or processing of export goods;*
- (b) charges, if any, for the design or brand;*
- (c) an amount towards profit.*

Hence, the value of the goods has been determined on the basis of CA certified Cost Sheet submitted by the exporter under Rule 5 of the Customs Valuation (Determination of value of export goods) Rules, 2007 and it appears to be fair.

14.3 Form the foregoing, it appears that the declared value of the three items by the exporter is the transaction value and it has not been influenced by the relationship between the exporter and the overseas buyer. The exporter a manufacture exporter accredited with GMPEU and Russia and having 570.28 crores of total revenue and after perusal of balance sheet, wherein profit margin which is 12% to 24% is in line of balance sheet, wherein profit after is 18%. The

exporter submitted cost sheet are certified by M/s RKR & Associates, Chartered Accountants having firm No. 0097855. Hence, after perusal of the submission given by the exporter, it appears that valuation of the aforesaid goods is fair considering the expenditure incurred in abroad as discussed above. From the facts, evidence and provisions discussed above, it appears that the value of the goods was fair and there was not appear any mis-declaration in respect of valuation of the goods for availing any type of incentives.

14.4 For the past shipping bills as mentioned in Table-II wherein foreign remittance have not been received or partially received by the exporter in 138 shipping bills and thereby in a manner which rendered the said goods liable for confiscation in terms of provisions of Section 113(ia) and 113(ja) of the Customs Act, 1962. Further, as per Rule 18 (1) of the Customs and Central Excise Duties Drawback Rules, 2017, if an amount of drawback has been paid to an exporter but the sale proceeds in respect of such export goods has not been realized or partially received within the time allowed under the Foreign Exchange (FEMA), 1999, such drawback amount is recovered. Hence, the export incentives claimed by the exporter in all the Shipping Bills shall be demanded back along with applicable interest in terms of rule 18 of Customs and Central Excise Duties Drawback Rules, 2017 in terms of Notification No. 76/2021-Cus(N.T) dated 23.09.2021, 77/2021-Cus (N.T) dated 24.09.2021 & 25/2023-Cus (N.T) dated 01.04.2023 and section 28AAA read with section 28AA of the Customs Act, 1962.

14.5 From the above discussion, it appears that the M/s Jodas Expoim Pvt Ltd (IEC: 0509067654) have rendered themselves liable for penalty in terms of section 114AB of the Customs Act, 1962 on account of the claiming and receipt of export benefit/ incentives though the foreign remittance in the past Shipping Bills filed by the exporter not received till date as mentioned at Table-II above.

14.6 It further appears that the exporter M/s Jodas Expoim Pvt Ltd (IEC: 0509067654) have rendered themselves liable to penalty in terms of Section 114(iii) of the Customs Act, 1962, as the goods proposed for confiscation u/s 113(ia) and 113 (ja) of the Customs Act, 1962.

15. Now, therefore, M/s Jodas Expoim Pvt Ltd (IEC: 0509067654) having registered address at 3rd Floor, NSL Centrum, Plot No. S-1, Sy No: 1043 & 1048, KPHB Phase-III, Kukatpally, Hyderabad-500072 are hereby called upon to Show Cause to the Additional Commissioner of Customs, CEAC, NS-II, JNCH, having office at Jawaharlal Custom House, Nhava Sheva, Tal-Uran, Dist-Raigad, Maharashtra, within 30 days of receipt of this notice as to why:

- i. The goods valued at Rs. 1,29,84,27,930/-/-for the past export covered under shipping bill as mentioned in Table-II on account of non-receipt of foreign remittance should not be confiscated under the provisions of Section 113(ia) and 113(ja) of the Customs Act, 1962.
- ii. The differential drawback amount of Rs. 1,14,18,345/- claimed in the past shipping bills as mentioned at Table-II above should not be demanded from the exporter along with applicable interest under Section 75 and 75A of the Customs Act 1962 read with Rule 17 &18 of the drawback Rules, 2017 read with section 28AA of the Customs Act, 1962.
- iii. The differential Rodtep amount of Rs. 11,68,783/- claimed in the past shipping bills as mentioned at Table-II above should not be demanded from the exporter

along with applicable interest in terms of Notification No. 76/2021-Cus(N.T) dated 23.09.2021, 77/2021-Cus (N.T) dated 24.09.2021 & 25/2023-Cus (N.T) dated 01.04.2023 and section 28AAA read with section 28AA of the Customs Act, 1962.

- iv. Penalty should not be imposed upon the exporter M/s Jodas Expoin Pvt. Ltd. (IEC: 0509067654) 114AB of the Customs Act, 1962 on account for obtaining instrument by fraud etc. in past shipping bills.
- v. Penalty should not be imposed upon the exporter M/s Jodas Expoin Pvt. Ltd. (IEC: 0509067654) 114(iii) of the Customs Act, 1962.
- vi. The bond should not be enforced and Bank Guarantee/Cash Security of Rs. 25,00,000/- (Rupees Twenty Five Lakh Only) at the time of provisional release of the goods for Export, should not be appropriated against export incentives, applicable interest, and penalty etc. arising out of this order.

16. The aforesaid noticee is to submit their written reply within 30 days before the adjudicating authority. In their reply, they should clearly state whether they wish to be heard in person or not. In case no such request is made or they do not appear before the adjudicating authority on the date and time fixed, the case will be decided ex-parte on the basis of available records without any further reference to them.

17. In case the notice is eligible to avail the facility of settlement of the case as per the Chapter XIVA of the Customs Act, 1962, and interested in the same, he may apply to the Settlement Commission as per prescribed procedure and also inform the same to the Adjudicating Authority

18. This show cause notice is issued only in respect of issues discussed in the show cause notice and the goods mentioned against the shipping bill discussed hereinabove.

19. This show cause notice is issued without prejudice to any other action that may be taken in respect of the impugned goods and/or the persons/company mentioned in the notice, under the provisions of the Customs Act, 1962 and/or any other law for the time being in force.

20. The Department reserves its right to add, amend, modify, etc. this notice based on any fresh facts or evidence which may come to the notice of the Department after issue of this notice but prior to adjudication thereof.

21. List of the documents relied upon in this notice (RUDs) are as per Annexure-A attached with this notice. It may be noted that all the relied upon documents and annexure enclosed with this show cause notice are an integral part of this show cause notice.

Signed by
Mallinath Kashinath Jeure
Date: 28-03-2025 16:03:10

(Mallinath K. Jeure)
Addl. Commissioner of Customs,
CEAC/NS-II, JNCH

To,

**M/s Jodas Expoim Pvt Ltd (IEC: 0509067654)
3rd Floor, NSL Centrum, Plot No. S-1,
Sy No: 1043 & 1048, KPHB Phase-III,
Kukatpally, Hyderabad-500072**

Copy to:

1. The Asstt. Commissioner of Customs, SIIB (X), JNCH
2. The Asstt. Commissioner of Customs, Drawback Section, JNCH.
3. The Asstt. Commissioner of Customs, CRAC(X), JNCH.
4. The Asstt. Commissioner of Customs, CRRC Cell, JNCH.
5. The Supdt./CHS, JNCH for display on Notice Board.
6. Office Copy

Annexure – A

Sr. No.	List of Relied Upon Documents
RUD-I	Copy of Shipping Bills no. 4410372, 4410237, 4410235, 4412784 dated 24.09.2022
RUD-II	Copy of Panchanama dated 12.10.2022
RUD-III	Copy of provisional release
RUD-IV	Copy of Statement dated 28.11.2022 of Shri. Piyush Gupta, DGM-Operations (TPM) of M/s Jodas Expoim Pvt. Ltd.
RUD-V	Copy of Statement dated 06.10.2023 of Shri. Piyush Gupta, DGM-Operations (TPM) of M/s Jodas Expoim Pvt. Ltd.
RUD-VI	Copy of Cost Sheet are certified by M/s RKR & Associates, Chartered Accountants having firm No. 0097855
RUD-VIII	Copy of E-BRC of the Shipping Bills no. 4410372, 4410237, 4410235, 4412784 dated 24.09.2022

25,00,000/- (Rupees Twenty Five Lakh Only) at the time of provisional release of the goods for Export, should not be appropriated against export incentives, applicable interest, redemption fine and penalty etc. arising out of this order.

16. The aforesaid noticee is to submit their written reply within 30 days before the adjudicating authority. In their reply, they should clearly state whether they wish to be heard in person or not. In case no such request is made or they do not appear before the adjudicating authority on the date and time fixed, the case will be decided ex-parte on the basis of available records without any further reference to them.

17. In case the notice is eligible to avail the facility of settlement of the case as per the Chapter XIVA of the Customs Act, 1962, and interested in the same, he may apply to the Settlement Commission as per prescribed procedure and also inform the same to the Adjudicating Authority

18. This show cause notice is issued only in respect of issues discussed in the show cause notice and the goods mentioned against the shipping bill discussed hereinabove.

19. This show cause notice is issued without prejudice to any other action that may be taken in respect of the impugned goods and/or the persons/company mentioned in the notice, under the provisions of the Customs Act, 1962 and/or any other law for the time being in force.

20. The Department reserves its right to add, amend, modify, etc. this notice based on any fresh facts or evidence which may come to the notice of the Department after issue of this notice but prior to adjudication thereof.

21. List of the documents relied upon in this notice (RUDs) are as per Annexure-A attached with this notice. It may be noted that all the relied upon documents and annexure enclosed with this show cause notice are an integral part of this show cause notice.

**ADDL. COMMISSIONER OF CUSTOMS
CEAC, NS-II, JNCH**

To,

**M/s Jodas Expoim Pvt Ltd (IEC: 0509067654)
3rd Floor, NSL Centrum, Plot No. S-1,
Sy No: 1043 & 1048, KPHB Phase-III,
Kukatpally, Hyderabad-500072**

Copy to:

1. The Asstt. Commissioner of Customs, SIIB (X), JNCH
2. Supdt/CHS, JNCH for display on Notice Board.
3. Office Copy

Annexure – A

Sr. No.	List of Relied Upon Documents
RUD-I	Copy of Shipping Bills no. 4410372, 4410237, 4410235, 4412784

	dated 24.09.2022
RUD-II	Copy of Panchanama dated 12.10.2022
RUD-III	Copy of provisional release
RUD-IV	Copy of Statement dated 28.11.2022 of Shri. Piyush Gupta, DGM-Operations (TPM) of M/s Jodas Expoim Pvt. Ltd.
RUD-V	Copy of Statement dated 06.10.2023 of Shri. Piyush Gupta, DGM-Operations (TPM) of M/s Jodas Expoim Pvt. Ltd.
RUD-VI	Copy of Cost Sheet are certified by M/s RKR & Associates, Chartered Accountants having firm No. 0097855
RUD-VIII	Copy of E-BRC of the Shipping Bills no. 4410372, 4410237, 4410235, 4412784 dated 24.09.2022

Rose Mount Shipping
[Shipping Bill Check List]

S.B No. & Date :4412784 24/09/2022 Printed On:15/11/2022
Icegate Job No :8434 File Reference No:8434 Date:24/09/2022
CHA :AAACR8617DCH003 Name :Rose Mount Shipping
Port of Loading:CusHouse, JNPT-INNSA1 State of Origin,Code :TELANGANA,36
Printed On :15/11/2022 Entered On :24/09/2022

EXPORTER DETAILS : CONSIGNEE DETAILS:
0509067654 000 " JODAS EXPOIM"
JODAS EXPOIM PVT.LTD., 140202, MOSCOW REGION,VOSKRESENSKY
Branch Sr. No. :9 DISTRICT, VOSKRESENK, STREET MOSCOW
JODAS EXPOIM PVT.LTD., 45 LETTER M, OFFICE 4, CONTACT PERS
H NO 5-9-262/40, RAJEEV GANDHI NAGAON: MR. SHASHI SHANKAR,
KUKATPALLY VILLAGE, RUSSIA
KUKATPALLY MAND HYDERBAD TELANGANA-
GSN - GSTIN-NORMAL 36AABCJ8653L1Z3
Type of Exporter :[F] - Manufacturer
Port of Discharge :NOVOROSSIYSK
Country of Discharge:RUSSIA Total Packages :790
Port of Final Dest.:MOSCOW Loose Packets :0
Country Final Dest. :RUSSIA Net Weight :10025.00 KGS
Gross Weight :11052.00 KGS Number of Ctrs :0
Nature Of Cargo. :C CONTAINERIZED
Marks and Nos. :AS PER INV.LUT NO.: AD360422000640R DT: 01/04/2022."WE INTEN
D TO CLAIM REMISSION OF DUTIES AND TAXES ON EXPORTED PRODUCTS SCHEME (RODTEP)" WE U
NDERTAKE TO ABIDE BY PROVISIONS OF FEMA ACT1999,AS AMENDED FROM TIME TO TIME,INC
LUDING REALIZATION/ REPARIATIO
Forex Bank A/c No :50200041270845 RBI Waiver No/Date:
FOB Value(INR) :5508449.1 DRAWBACK(INR) :71609.84
Adcode :0510019 Bank A/c Number :

INVOICE DETAILS Number of Invoices : 1

Invoice S.NO. :1 Contract Number:
Invoice Number :1210000003 Date :22/09/2022
Nature Of Contract :CF Buyer Details :
Nature Of Payment :DA SAME AS CONSIGNEE
Period Of Agreement:120
Currency Code :USD
Exchange Rate :78.7
Invoice Value(FC) :74993
Invoice Value(INR) :5901949.1 DBK Value(INR) : 71609.84
Whether Unit Price Includes : F

	Rate	Currency	Amount
Insurance	0	USD	0
Freight	0	USD	5000
Commission	0	USD	0
Discount	0	USD	0
Other Ded.	0	USD	0
Packing Charges	0	USD	0

ITEMS OF EXPORT

No	RITC CD	Description	Quantity	Units	Item RatePer	Unit	Value(FC)	FOB(INR)	End Use	Reward
		Scheme Description				PMV	TOT PMV		SchCd	Yes/No
1		30049099 PARACETAMOL INFUSION BP 10MG/ML- 100ML/PP BOTTLE								Yes
									DCH100	
			78940	NOS	0.95	Per 1	NOS 74993.00	5508449.1	19	
		DRAWBACK (DBK)				76.76	6059434.4		IGST Rate :%	
		LUT Export under Bond				IGST Value:			IGST Amount:	

TOTAL IGST VALUE: 0 TOTAL IGST AMOUNT: 0
TOTAL FOB: 5508449.1 TOTAL PMV: 6059434.4

DRAWBACK PAYABLE

Inv	Item	Drawback SNo.	DBK Rate	DBK Qty	Unit	DBK Amt (INR)
Sno	SNO		DBK Special			
1	1	3004B	1.3	78940	NOS	71609.84
			0			71609.84

VESSEL DETAILS

FACTORY STUFFED SAMPLE ACC. VESSEL DETAILS

N N

PACKING DETAILS

PACKAGE FROM	PACKAGE TO	PACKAGE KIND
1	790	PKG

SINGLE WINDOW - INFO DETAILS

InvNo.	ItemsNo	Info Type	Info Qualifier	MSR Qty	MSR UNIT
Info Code /	Info text				
1	1	Item Characteristics	SQC	10025.00	KGS
1	1	Origin Criteria	STO		
TELANGANA					
1	1	Origin Criteria	DOO		
HYDERABAD					
1	1	Origin Criteria	EPT		
PREFERENTIAL TRADE BENEFIT NOT CLAIMED AT IMPORTING COUNTRY					
1	1	DTY	GCESS	0	INR

1 1 DTY

RDT

RODTEPN

Not Claimed

SINGLE WINDOW - SUPPORTING DOCUMENTS DETAILS

1	1	2022092400095796	Certificate of analysis - Drug
0010DC		1210000003	
JODAS EXPOIM PVT.LTD.,			
OOO " JODAS EXPOIM"			
1	1	2022092400095795	Certificate of analysis - Drug
0010DC		1210000003	
JODAS EXPOIM PVT.LTD.,			
OOO " JODAS EXPOIM"			
1	1	2022092400095793	Bond
165000		1210000003	
JODAS EXPOIM PVT.LTD.,			
OOO " JODAS EXPOIM"			
1	1	2022092400095794	Value declaration (GATT Valuation Declaration)
934000		1210000003	
JODAS EXPOIM PVT.LTD.,			
OOO " JODAS EXPOIM"			
1	1	2022092400095792	Commercial invoice which includes a packing list
331000		1210000003	
JODAS EXPOIM PVT.LTD.,			
OOO " JODAS EXPOIM"			

I/We declare that the particulars given herein are true and are correct,
I/We undertake to abide by provisions of Foreign Exchange Management Act,
1999, as amended from time to time, including realisation / repatriation of
foreign exchange to / from India.

Exporter/CHA with date

For Rose Mount Shipping

Rose Mount Shipping
[Shipping Bill Check List]

S.B No. & Date :4410235 24/09/2022 Printed On:15/11/2022
Icegate Job No :8433 File Reference No:8433 Date:24/09/2022
CHA :AAACR8617DCH003 Name :Rose Mount Shipping
Port of Loading:CusHouse, JNPT-INNSA1 State of Origin,Code :TELANGANA,36
Printed On :15/11/2022 Entered On :24/09/2022

EXPORTER DETAILS :

0509067654

JODAS EXPOIM PVT.LTD.,

Branch Sr. No. :9

JODAS EXPOIM PVT.LTD.,

H NO 5-9-262/40, RAJEEV GANDHI NAGAON: MR. SHASHI SHANKAR,

KUKATPALLY VILLAGE,

KUKATPALLY MAND HYDERBAD TELANGANA-

GSN - GSTIN-NORMAL 36AABCJ8653L1Z3

Type of Exporter :[F] - Manufacturer

Port of Discharge :NOVOROSIYSK

Country of Discharge:RUSSIA

Port of Final Dest.:MOSCOW

Country Final Dest. :RUSSIA

Gross Weight :4055.00 KGS

Nature Of Cargo. :C CONTAINERIZED

Marks and Nos. :AS PER INV.LUT NO.: AD360422000640R DT: 01/04/2022."WE INTEND TO CLAIM REMISSION OF DUTIES AND TAXES ON EXPORTED PRODUCTS SCHEME (RODTEP)" WE UNDERTAKE TO ABIDE BY PROVISIONS OF FEMA ACT 1999, AS AMENDED FROM TIME TO TIME, INCLUDING REALIZATION/ REPARATION

Forex Bank A/c No :

FOB Value(INR) :18982440

Adcode :6390364

CONSIGNEE DETAILS:

OOO " JODAS EXPOIM"

140202, MOSCOW REGION, VOSKRESENSKY

DISTRICT, VOSKRESENK, STREET MOSCOW

45 LETTER M, OFFICE 4, CONTACT PERS

RUSSIA

Total Packages :296

Loose Packets :0

Net Weight :3759.00 KGS

Number of Ctrs :0

RBI Waiver No/Date:

DRAWBACK(INR) :246771.72

Bank A/c Number :

INVOICE DETAILS Number of Invoices : 1

Invoice S.NO. :1

Invoice Number :1210000002

Nature Of Contract :CF

Nature Of Payment :DA

Period Of Agreement:120

Currency Code :USD

Exchange Rate :78.7

Invoice Value(FC) :244200

Invoice Value(INR) :19218540

Whether Unit Price Includes : F

Contract Number:

Date :22/09/2022

Buyer Details :

SAME AS CONSIGNEE

DBK Value(INR) : 246771.72

	Rate	Currency	Amount
Insurance	0	USD	0
Freight	0	USD	3000
Commission	0	USD	0
Discount	0	USD	0
Other Ded.	0	USD	0
Packing Charges	0	USD	0

ITEMS OF EXPORT

No	RITC CD	Description	Unit	Value(FC)	FOB(INR)	End Use	Reward
Quantity	Units	Item RatePer	Unit	Value(FC)	FOB(INR)	End Use	Reward
Scheme	Description		PMV	TOT PMV		SchCd	Yes/No
1	30049029	FLUCONAZOLE INFUSION BP 2MG/ML- 100ML/PP BOTTLE					Yes
						DCH100	
29600	NOS	8.25	Per 1	NOS	244200.00	18982440	19
	DRAWBACK (DBK)			705.43	20880728	IGST Rate :%	
	LUT Export under Bond	IGST Value:				IGST Amount:	
TOTAL IGST VALUE: 0				TOTAL IGST AMOUNT: 0			
TOTAL FOB: 18982440				TOTAL PMV: 20880728			

DRAWBACK PAYABLE

Inv	Item	Drawback SNo.	DBK Rate	DBK Qty	Unit	DBK Amt (INR)
Sno	SNO		DBK Special			
1	1	3004B	1.3	29600	NOS	
			0			246771.72
						246771.72

VESSEL DETAILS

FACTORY STUFFED SAMPLE ACC. VESSEL DETAILS

N N

PACKING DETAILS

PACKAGE FROM PACKAGE TO PACKAGE KIND

1 296 PKG

SINGLE WINDOW - INFO DETAILS

InvNo.	ItemsSNo	Info Type	Info Qualifier	MSR Qty	MSR UNIT
Info Code /	Info text				
1	1	Item Characteristics	SQC	3759.00	KGS
1	1	Origin Criteria	STO		
TELANGANA					
1	1	Origin Criteria	DOO		
HYDERABAD					
1	1	Origin Criteria	EPT		
PREFERENTIAL TRADE BENEFIT NOT CLAIMED AT IMPORTING COUNTRY					
1	1	DTY	GCESS	0	INR

1 1 DTY

RDT

RODTEPN

Not Claimed

SINGLE WINDOW - SUPPORTING DOCUMENTS DETAILS

1	1	2022092400079153	Certificate of analysis - Drug
0010DC		1210000002	
JODAS EXPOIM PVT.LTD.,			
OOO " JODAS EXPOIM"			
1	1	2022092400079152	Value declaration (GATT Valuation Declaration)
934000		1210000002	
JODAS EXPOIM PVT.LTD.,			
OOO " JODAS EXPOIM"			
1	1	2022092400079151	Bond
165000		1210000002	
JODAS EXPOIM PVT.LTD.,			
OOO " JODAS EXPOIM"			
1	1	2022092400079150	Certificate of quality
003000		1210000002	
JODAS EXPOIM PVT.LTD.,			
OOO " JODAS EXPOIM"			
1	1	2022092400079149	Commercial invoice which includes a packing list
331000		1210000002	
JODAS EXPOIM PVT.LTD.,			
OOO " JODAS EXPOIM"			

I/We declare that the particulars given herein are true and are correct,
I/We undertake to abide by provisions of Foreign Exchange Management Act,
1999, as amended from time to time, including realisation / repatriation of
foreign exchange to / from India.

Exporter/CHA with date

For Rose Mount Shipping

Rose Mount Shipping
[Shipping Bill Check List]

S.B No. & Date : Printed On:15/11/2022
Icegate Job No :8431 File Reference No:8431 Date:24/09/2022
CHA :AAACR8617DCH003 Name :Rose Mount Shipping
Port of Loading:CusHouse, JNPT-INNSA1 State of Origin,Code :TELANGANA,36
Printed On :15/11/2022 Entered On :24/09/2022

EXPORTER DETAILS : CONSIGNEE DETAILS:
0509067654 OOO " JODAS EXPOIM"
JODAS EXPOIM PVT.LTD 140202, MOSCOW REGION,VOSKRESENSKY
Branch Sr. No. :0 DISTRICT, VOSKRESENK, STREET MOSCOW
JODAS EXPOIM PVT.LTD 45 LETTER M, OFFICE 4, CONTACT PERS
PLOT NO 55 AND 45 TSIIC,BIOTECH PH ON: MR. SHASHI SHANKAR,
ASE-III KARAKAPATLA RUSSIA
MEDAK,TELANGANA TELANGANA-502281
GSN - GSTIN-NORMAL 36AABCJ8653L1Z3
Type of Exporter :[F] - Manufacturer
Port of Discharge :NOVOROSSIYSK
Country of Discharge:RUSSIA Total Packages :30
Port of Final Dest.:MOSCOW Loose Packets :0
Country Final Dest. :RUSSIA Net Weight :450.00 KGS
Gross Weight :489.00 KGS Number of Ctrs :0
Nature Of Cargo. :C CONTAINERIZED
Marks and Nos. :AS PER INV.LUT NO.: AD360422000640R DT: 01/04/2022."WE INTEN
D TO CLAIM REMISSION OF DUTIES AND TAXES ON EXPORTED PRODUCTS SCHEME (RODTEP)" WE U
NDERTAKE TO ABIDE BY PROVISIONS OF FEMA ACT1999,AS AMENDED FROM TIME TO TIME,INC
LUDING REALIZATION/ REPARIATIO
Forex Bank A/c No :50200041270845 RBI Waiver No/Date:
FOB Value(INR) :28473660 DRAWBACK(INR) :370157.58
Adcode :0510019 Bank A/c Number :

INVOICE DETAILS Number of Invoices : 1

Invoice S.NO. :1 Contract Number:
Invoice Number :90204145 Date :22/09/2022
Nature Of Contract :CF Buyer Details :
Nature Of Payment :DA SAME AS CONSIGNEE
Period Of Agreement:120
Currency Code :USD
Exchange Rate :78.7
Invoice Value(FC) :363000
Invoice Value(INR) :28568100 DBK Value(INR) : 370157.58
Whether Unit Price Includes : F

	Rate	Currency	Amount
Insurance	0	USD	0
Freight	0	USD	1200
Commission	0	USD	0
Discount	0	USD	0
Other Ded.	0	USD	0
Packing Charges	0	USD	0

4410237
24/9/22

ITEMS OF EXPORT

No	RITC CD	Description	Quantity	Units	Item	RatePer	Unit	Value(FC)	FOB(INR)	End Use	Reward
		Scheme Description					PMV	TOT PMV		SchCd	Yes/No
1	30049049	CAPECITABINE TABLETS USP 500MG (120 TABLETS	1	BOTTLE)							Yes
										DCH100	
3000	NOS	121	Per 1	NOS	363000.00	28473660	19				
		DRAWBACK (DBK)			10440.34	31321020				IGST Rate :%	
		LUT Export under Bond			IGST Value:					IGST Amount:	
TOTAL IGST VALUE: 0 TOTAL IGST AMOUNT: 0											
TOTAL FOB: 28473660 TOTAL PMV: 31321020											

DRAWBACK PAYABLE

Inv	Item	Drawback SNo.	DBK Rate	DBK Qty	Unit	DBK Amt (INR)
Sno	SNO		DBK Special			
1	1	3004B	1.3	3000	NOS	370157.58
			0			370157.58

VESSEL DETAILS

FACTORY STUFFED SAMPLE ACC. VESSEL DETAILS

N N

PACKING DETAILS

PACKAGE FROM	PACKAGE TO	PACKAGE KIND
1	30	PKG

SINGLE WINDOW - INFO DETAILS

InvNo.	ItemsNo	Info Type	Info Qualifier	MSR Qty	MSR UNIT
Info Code / Info text					
1	1	Item Characteristics	SQC	450.00	KGS
1	1	Origin Criteria	STO		
TELANGANA					
1	1	Origin Criteria	DOO		
HYDERABAD					
1	1	Origin Criteria	EPT		
PREFERENTIAL TRADE BENEFIT NOT CLAIMED AT IMPORTING COUNTRY					
1	1	DTY	GCESS	0	INR

1 1 DTY
RODTEPN
Not Claimed

RDT

SINGLE WINDOW - SUPPORTING DOCUMENTS DETAILS

1	1	2022092400077669	Certificate of quality
003000	90204145		
JODAS EXPOIM PVT.LTD			
OOO " JODAS EXPOIM"			
1	1	2022092400077668	Value declaration (GATT Valuation Declaration)
934000	90204145		
JODAS EXPOIM PVT.LTD			
OOO " JODAS EXPOIM"			
1	1	2022092400077667	Certificate of analysis - Drug
0010DC	90204145		
JODAS EXPOIM PVT.LTD			
OOO " JODAS EXPOIM"			
1	1	2022092400077666	Bond
165000	90204145		
JODAS EXPOIM PVT.LTD			
OOO " JODAS EXPOIM"			
1	1	2022092400077665	Commercial invoice which includes a packing list
331000	90204145		
JODAS EXPOIM PVT.LTD			
OOO " JODAS EXPOIM"			

I/We declare that the particulars given herein are true and are correct,
I/We undertake to abide by provisions of Foreign Exchange Management Act,
1999, as amended from time to time, including realisation / repatriation of
foreign exchange to / from India.

Exporter/CHA with date

For Rose Mount Shipping

Rose Mount Shipping
[Shipping Bill Check List]

S.B No. & Date : Printed On:15/11/2022
Icegate Job No :8432 File Reference No:8432 Date:24/09/2022
CHA :AAACR8617DCH003 Name :Rose Mount Shipping
Port of Loading:CusHouse, JNPT-INNSA1 State of Origin,Code :TELANGANA,36
Printed On :15/11/2022 Entered On :24/09/2022

EXPORTER DETAILS :

0509067654
JODAS EXPOIM PVT.LTD
Branch Sr. No. :0
JODAS EXPOIM PVT.LTD
PLOT NO 55 AND 45 TSIIC,BIOTECH PH ON: MR. SHASHI SHANKAR,
ASE-III KARAKAPATLA
MEDAK,TELANGANA TELANGANA-
GSN - GSTIN-NORMAL 36AABCJ8653L1Z3

CONSIGNEE DETAILS:

OOO " JODAS EXPOIM"
140202, MOSCOW REGION,VOSKRESENSKY
DISTRICT, VOSKRESENK, STREET MOSCOW
45 LETTER M, OFFICE 4, CONTACT PERS
RUSSIA

Type of Exporter :[F] - Manufacturer

Port of Discharge :NOVOROSSIYSK

Country of Discharge:RUSSIA

Port of Final Dest.:MOSCOW

Country Final Dest. :RUSSIA

Gross Weight :489.00 KGS

Nature Of Cargo. :C CONTAINERIZED

Marks and Nos. :AS PER INV.LUT NO.: AD360422000640R DT: 01/04/2022."WE INTEN
D TO CLAIM REMISSION OF DUTIES AND TAXES ON EXPORTED PRODUCTS SCHEME (RODTEP)" WE U
NDERTAKE TO ABIDE BY PROVISIONS OF FEMA ACT1999,AS AMENDED FROM TIME TO TIME,INC
LUDING REALIZATION/ REPARIATIO

Forex Bank A/c No :50200041270845

FOB Value(INR) :28473660

Adcode :0510019

Total Packages :30

Loose Packets :0

Net Weight :450.00 KGS

Number of Ctrs :0

RBI Waiver No/Date:

DRAWBACK(INR) :370157.58

Bank A/c Number :

INVOICE DETAILS Number of Invoices : 1

Invoice S.NO. :1

Invoice Number :90204146

Nature Of Contract :CF

Nature Of Payment :DA

Period Of Agreement:120

Currency Code :USD

Exchange Rate :78.7

Invoice Value(FC) :363000

Invoice Value(INR) :28568100

Whether Unit Price Includes : F

Contract Number:

Date :22/09/2022

Buyer Details :

SAME AS CONSIGNEE

DBK Value(INR) : 370157.58

	Rate	Currency	Amount
Insurance	0	USD	0
Freight	0	USD	1200
Commission	0	USD	0
Discount	0	USD	0
Other Ded.	0	USD	0
Packing Charges	0	USD	0

ITEMS OF EXPORT

No	RITC CD	Description	Quantity	Units	Item	RatePer	Unit	Value(FC)	FOB(INR)	End Use	Reward
		Scheme Description					PMV	TOT PMV		SchCd	Yes/No
1		30049049 CAPECITABINE TABLETS USP 500MG (120 TABLETS 1 BOTTLE)									Yes
										DCH100	
		3000 NOS 121 Per 1 NOS						363000.00	28473660	19	
		DRAWBACK (DBK)						10440.34	31321020	IGST Rate :%	
		LUT Export under Bond						IGST Value:		IGST Amount:	
TOTAL IGST VALUE: 0 TOTAL IGST AMOUNT: 0											
TOTAL FOB: 28473660 TOTAL PMV: 31321020											

DRAWBACK PAYABLE

Inv	Item	Drawback SNo.	DBK Rate	DBK Qty	Unit	DBK Amt (INR)
Sno	SNO		DBK Special			
1	1	3004B	1.3	3000	NOS	
			0			370157.58
						370157.58

VESSEL DETAILS

FACTORY STUFFED SAMPLE ACC. VESSEL DETAILS

N N

PACKING DETAILS

PACKAGE FROM	PACKAGE TO	PACKAGE KIND
1	30	PKG

SINGLE WINDOW - INFO DETAILS

InvNo.	Items	SNo	Info Type	Info Qualifier	MSR Qty	MSR UNIT
Info Code / Info text						
1	1	Item Characteristics	SQC		450.00	KGS
1	1	Origin Criteria	STO			
TELANGANA						
1	1	Origin Criteria	DOO			
HYDERABAD						
1	1	Origin Criteria	EPT			
PREFERENTIAL TRADE BENEFIT NOT CLAIMED AT IMPORTING COUNTRY						
1	1	DTY	GCESS		0	INR

1 1 DTY

RDT

RODTEPN

Not Claimed

SINGLE WINDOW - SUPPORTING DOCUMENTS DETAILS

1	1	2022092400078521	Certificate of analysis - Drug
0010DC		90204146	
JODAS EXPOIM PVT.LTD			
OOO " JODAS EXPOIM"			
1	1	2022092400078520	Bond
165000		90204146	
JODAS EXPOIM PVT.LTD			
OOO " JODAS EXPOIM"			
1	1	2022092400078519	Commercial invoice which includes a packing list
331000		90204146	
JODAS EXPOIM PVT.LTD			
OOO " JODAS EXPOIM"			
1	1	2022092400078523	Certificate of quality
003000		90204146	
JODAS EXPOIM PVT.LTD			
OOO " JODAS EXPOIM"			
1	1	2022092400078522	Value declaration (GATT Valuation Declaration)
934000		90204146	
JODAS EXPOIM PVT.LTD			
OOO " JODAS EXPOIM"			

I/We declare that the particulars given herein are true and are correct,
I/We undertake to abide by provisions of Foreign Exchange Management Act,
1999, as amended from time to time, including realisation / repatriation of
foreign exchange to / from India.

Exporter/CHA with date

For Rose Mount Shipping

P A N C H A N A M A dated 12.10.2022

Pancha-I:

Name : Shri Sudhakar Dhondu Sanas
Age : 58 Years
Occupation : Service
Address : C/o Dhondu Sanas, House No. 506, Room No. -409, Datta Niwas
B wing, Near Datta Mandir, Sector 31, Vashi Gaon , Navi
Mumbai, Thane, Maharashtra-400 703
Mobile No. : 9664292982

Pancha-II :

Name : Shri Vishal Sunil Sondkar
Age : 30
Occupation : Service
Address : Sector 7, Near Pillai Global Acadamy, Khanda Colony, Navnirman
CHS, Room No 8, Plot No. 39/A, New Panvel West, Raigarh, -
4102016.
Mobile No. : 9768015048

We the above mentioned Panchas were called upon by a person who introduced himself by name Shri Arvind Kumar, as Senior Intelligence Officer, SIIB(X), JNCH on 12.10.2022 at 15.20 Hrs., at ULA CFS, Sector 7, Dronagiri Node, , Tal: Uran, Dist.: Raigad, Navi Mumbai to witness the examination of goods carted at Examination area specified by the CFS pertaining to the Exporter M/s. Jodas Expoim Pvt Ltd (IEC: 0509067654) covered under Shipping Bill No.4410372, 4410237, 4410235, 4412784 dated 24.09.2022, filed through Customs House Agent(CB) M/s Rosemount Shipping India Pvt Ltd. (11/1277). The aforesaid Consignment was forwarded by DC/ ULA for further investigation.

Here, we were introduced to another Senior Intelligence Officer named Shri Naveen Kumar SIO, SIIB (X), JNCH along with Shri Satish V Rane, representative of aforesaid CHA and Exporter M/s. Jodas Expoim Pvt Ltd (IEC: 0509067654), holding Kardex No. R-611. The officers explained to us that they wanted to examine the goods covered under above mentioned shipping bill. The exporter M/s. Jodas Expoim Pvt Ltd (IEC: 0509067654), declared to have IEC address Plot No. 55 and 45 TSIC, Biotech Park Phase III, Karkapati (V), Markook(M), Siddipet(D), Telenagana-502279. We were then shown the aforesated Shipping Bill and respective Packing List, Invoices of the cargoes with respective details as under:

P. 
12/10/22

R. 

S/B No./ Date	Invoice No./Packing List No.	Description	No. of Cartons	FOB (INR)	DBK Claimed (INR)
4410372 dated 24.09.2022	90204146 dated 22.09.2022	Capecitabine Tablets USP 500mg (120 Tablets# 1 Bottle)	30	28473660	370157
4410237 dated 24.09.2022	90204145 dated 22.09.2022	Capecitabine Tablets USP 500mg (120 Tablets# 1 Bottle)	30	28473660	370157
4410235 dated 24.09.2022	1210000002 dated 22.09.2022	Fluconazole infusion BP 2mg/ ml-100 ml/PP Bottle	296	18982440	246771
4412784 dated 24.09.2022	1210000003 dated 22.09.2022	Paracetamol Infusion BP 10MG/ -100 ml / PP Bottle	790	5508449	71609

Once, we were shown the above mentioned Shipping Bills , we put our dated signature on Shipping Bills, Packing Lists, Invoices of the cargoes as a token of having witnessed the same.

Thereafter, the examination of the goods covered under above mentioned S/bills were started. Firstly, the said consignment of abovementioned S/Bills were located, which were carted in Shed in location S-24 , T -25 and J-10, Marks and Numbers have been verified with the invoices, which were found in order.

Thereafter, randomly pkgs were opened by officers for examination of goods therein. All package, which were examined, found to have quantity of goods as per declaration. Thereafter, two representative samples of all three items were drawn on random basis for further investigation. The said samples were sealed under Custom seal. We have put our dated signature on the sealed samples as a token of having witnessed the drawl of samples in our presence.

After the examination of the goods in each pkgs, the same were repacked in the proper order in our presence. The examined goods were repacked by the representative of Exporter and said consignment was taken over by the CFS staff for the safe custody.

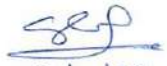
P₁ 

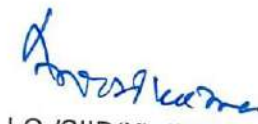
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The Panchnama running into three pages ended on the same place and same date i.e. 12.10.2022 at 17.15Hrs. Panchanama was carried out in a peaceful and systematic manner and no untoward incident was happened. No damage was done to the cargo.

Drawn by me, this 12th day of Oct 2022.

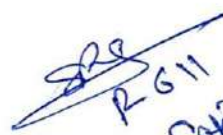
Pancha-I


12/10/22


S. I.O./SIIB(X), JNCH

Pancha-II


12/10/22


R G 11
Sahish Rane
Representative of Exporter


R G 11
Sahish Rane
Representative of CHA



OFFICE OF THE COMMISSIONER OF CUSTOMS, NS-II
SPECIAL INVESTIGATION AND INTELLIGENCE
BRANCH (X),

Jawaharlal Nehru Custom House, Nhava Sheva,
Dist- Raigad, Maharashtra – 400 707.

Tel No: 27244983: Fax: 27241828, 27241825.

Email Id – siibx.jnch@gov.in



F. No.SG/INV-128/2022-23 SIIB(X) JNCH

Date 14.11.2022

To,

The Dy. Commissioner of Customs,
ULA CFS,
Nhava Sheva.

Sir,

Sub: Provisional release of Shipment covered under S/Bills No. 4410372, 4410237, 4410235, 4412784 dated 24.09.2022 of M/s. Jodas Expoin Pvt Ltd (IEC: 0509067654). -reg.

Please refer to the subject mentioned above,

In this regard, it is informed that the shipment covered under the above mentioned shipping Bill was detained under seizure memo, issued under section 110 of the Customs Act.

2. Further, the exporter vide letter dated 03.11.2022 has requested for provisional release of the subject shipments, which has been approved by the Competent Authority subject to execution of bond of full FOB value i.e Rs.8,14,38,209/- (Eight crores fourteen lacs thirty eight thousands two hundred and nine rupees only) and Bank Guarantee of Rs 25,00,000/- (Twenty five lacs Rupees only).

3. Accordingly, the exporter has submitted BG No. 021GT01223140001 dated 10.11.2022 (issued on 10.11.2022 with date of expiry 09.11.2023 with auto renewal clause) of Rs. Rs 25,00,000/- (Twenty five lacs Rupees only) as security deposit and Bond of full FOB value as decided by the Competent Authority and same has been enclosed herewith for acceptance and allow the shipment for export thereafter. It is also requested to forward the Bond and Bank Guarantee to this office after acceptance of the same.

Yours faithfully,

(Dr. MANESH D CHAVAN)

Dy. Commissioner of Customs
SIIB(X), JNCH, Nhava Sheva

Statement of Mr. Piyush Gupta, DGM-Operations (TPM) (Emp Id J004) –of M/s Jodas Expoim Pvt Ltd , 3rd Floor, NSL Centrum, Plot No. S-1, Sy No. 1043 & 1048, KPHB Phase III, Kukatpally, Hyderabad-500 072 recorded under Section 108 of the Custom Act, 1962 in the office of Special Investigations and Intelligence Branch (Export) situated at B-403, J.N.C.H. Nhava Sheva, Dist Raigad- 400707 on 28.11.2022.

In pursuance of Summon issued dated 21.11.2022 under seal and signature of Shri Arvind Kumar , Superintendent of Customs, SIIB(X) I, Piyush Gupta present myself to give my statement under Section 108 of Customs Act, 1962. I have been explained the provisions of Section 108 of Customs Act, 1962. I have been also explained that giving false evidence under these enquiries is an offence punishable u/s 193 of the Indian Penal Code, 1860. I am also informed that this statement of mine can be used as evidence against me or any other person in any court of law, or for any adjudication proceedings. Having understood the provisions of Section 108 of the Customs Act, 1962, I am giving my true, correct and voluntary statement which is as follows:

My full name is Piyush Gupta. I am 47 years old. I am DGM-Operations(TPM) (Emp Id J004) of M/s Jodas Expoim Pvt Ltd and have my address at Block 11, Flat No. 302, Malaysian Township, Kukatpally, KPHB Colony, Medchal-Malkajgiri, Telangana-500 072. I reside at the above mentioned address. I live at this house with my wife and two kids. I can read, write and understand English, Russian and Hindi languages. I have studied up to Master of Engineering (Automobile) from Kharkhiv University, Ukraine. My mobile No. is 7702394444 and email id is piyush@jodasexpoim.in, I am submitting herewith copy of my Aadhar Card No. 6331 4934 4166 as proof of my identity and address. I hold savings account: 915010052075616 in Axis Bank, Hyderabad Branch.

Q. What is your position in the of **M/s Jodas Expoim Pvt Ltd.**?

A. I am working as DGM-Operations(TPM) (Emp Id J004 of M/s Jodas Expoim Pvt Ltd.

Q. For how many years have you been working in the current position?

A. I have been working for 10 years in M/s Jodas Expoim Pvt Ltd.

Q. Do you know why you have been called here?

A. Yes. I have been called to give explanation regarding valuation issue in four consignment covered under S/Bills No. 4410372, 4410237, 4410235, 4412784 dated 24.09.2022 , in which items are Capecitabine Tablets USP 500mg (120 Tablets# 1 Bottle), Fluconazole infusion BP 2mg/ ml-100 ml/PP Bottle and Paracetamol Infusion BP 10MG/ -100 ml / PP Bottle.

In this regard, I am submitting details in respect of overhead break up of product Registration Expenses, product development and other expenses of all three products, which are mentioned above.

I am also submitting similar products rates of other competitors, which are registered with the government of Russia which you can also check on Russian Govt. Website(Importing Country), the link for the same is <https://grls.rosminzdrav.ru/Default.aspx> which I have accessed here itself and copy of print outs of comparative price chart of same items are submitted to your goodself with my dated signature . With bare perusal, it can be seen that price are at par with the price quoted by the competitors registered with the government of Russia.

Q. Do you have Special Valuation Branch order issued by the Customs department from Russia as to whom your company is exporting is related with your company. What

already been submitted to your office on previous visit to your office by me. Hence, it is my submission that transaction value between us is not influenced due to our relationship. I also wish to submit that we do not have any Special Valuation Branch order issued from the Government of Russia in the regard.

Q Do you have anything other than you have already stated in previously stated in respect of pricing of subject consignment.

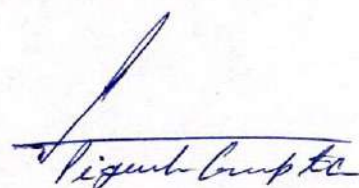
Ans: In addition of our earlier submission given to your office along with other relevant documents, we wish to submit that we are leading exporter among Indian Pharma companies who are exporting to Russia and we are only supplying to government of Russia through floated tender at registered and decided by the government of Russia on which price, we are bound to sell directly to hospitals only. We are not in retail business in Russia. It is pertinent to mention that as pharma business is very competitive and to develop one product is very cumbersome and lengthy process and sometimes it takes years after initial conception, afterwards there are mandatory trials and approvals with the statutory body for approval of human trials and other statutory compliances has to be taken before make it available in the market. This is general practice in pharma business to cover all costs, which were incurred to develop one product from inception to final stage along with keeping in view of in which market the product is to be sold.

We also wish to highlight, there is no guarantee whether the product is going to sellable or not or it will be approved with the other government regulatory bodies such as Russian govt. Hence, the prices are being fixed after taking all the other expenses apart from other expenses incurred on production, R&D etc.

This statement running into 1-2 pages is my voluntary and true statement and given without any force, threat coercion or promise. I have understood the statement and affirm that it has been correctly recorded as per my say. I undertake to present myself as and when required for any further statement.

(Piyush Gupta)

DGM and Authorized Representative of M/s
Jodas Expoin Private Limited

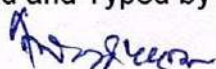


28.11.2022

Recorded and Typed by me

(Arvind Kumar)

S.I.O./SIIB(X)



28.11.2022

In my presence

Statement of Mr. Piyush Gupta, DGM-Operations (TPM) (Emp Id J004) –of M/s Jodas Expoin Pvt Ltd , 3rd Floor, NSL Centrum, Plot No. S-1, Sy No. 1043 & 1048, KPHB Phase III, Kukatpally, Hyderabad-500 072 recorded under Section 108 of the Custom Act, 1962 in the office of Special Investigations and Intelligence Branch (Export) situated at B-403, J.N.C.H. Nhava Sheva, Dist Raigad- 400707 on 06.10.2023.

In pursuance of Summon issued dated 27.09.2023 under seal and signature of Shri Kumar Swetank, Superintendent of Customs, SIIB(X) I, Piyush Gupta present myself to give my statement under Section 108 of Customs Act, 1962. I have been explained the provisions of Section 108 of Customs Act, 1962. I have been also explained that giving false evidence under these enquiries is an offence punishable u/s 193 of the Indian Penal Code, 1860. I am also informed that this statement of mine can be used as evidence against me or any other person in any court of law, or for any adjudication proceedings. Having understood the provisions of Section 108 of the Customs Act, 1962, I am giving my true, correct and voluntary statement which is as follows:

My full name is Piyush Gupta. I am 47 years old. I am DGM-Operations(TPM) (Emp Id J004) of M/s Jodas Expoin Pvt Ltd and have my address at Block 11, Flat No. 302, Malaysian Township, Kukatpally, KPHB Colony, Medchal-Malkajgiri, Telangana-500 072. I reside at the above mentioned address. I live at this house with my wife and two kids. I can read, write and understand English, Russian and Hindi languages. I have studied up to Master of Engineering (Automobile) from Kharkhiv University, Ukraine. My mobile No. is 7702394444 and email id is piyush@jodasexpoin.in, I am submitting herewith copy of my Aadhar Card No. 6331 4934 4166 as proof of my identity and address. I hold savings account: 915010052075616 in Axis Bank, Hyderabad Branch.

Q. Please provide details of your firm's registration with the Russian Government?

A. We are an exporter, with Russian GMP certificate (our facility audited by Russian Ministry of Health) However, we are not registered with the Russian Govt. Our consignee is a registered firm with the Russian Govt. I will be submit the registration details of our consignee within a week's time through email.

Q. Please elaborate about your relationship with the consignee?

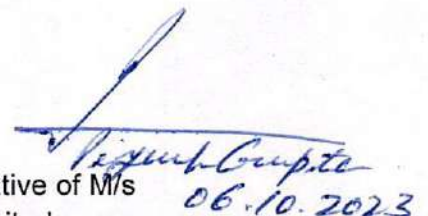
A. The consignee OOO Jodas, Russia is our related party, wherein Mr. Shashi Shankar Prasad is the common Director. I have furnished our firm audited balance sheet in support of the same.

Q. Apart from the above, is there anything else you would like to submit for the purpose of this investigation?

A. Apart from my previous submission, I would like to add that we have realized all the Forex pertaining to the shipments under S/Bills No. 4410372, 4410237, 4410235, 4412784 dated 24.09.2022 , in which items are Capecitabine Tablets USP 500mg (120 Tablets# 1 Bottle), Fluconazole infusion BP 2mg/ ml-100 ml/PP Bottle and Paracetamol Infusion BP 10MG/ -100 ml / PP Bottle.

This statement running into 1 page is my voluntary and true statement and given without any force, threat coercion or promise. I have understood the statement and affirm that it has been correctly recorded as per my say. I undertake to present myself as and when required for any further statement.

(Piyush Gupta)
DGM and Authorized Representative of M/s
Jodas Expoin Private Limited


06.10.2023

Annexure - I

Market	Russia	
Customer	OOO JODAS	
Product Name	Capcitabine Tablets USP 500mg (120 Tablets #1 Bottle	
Batch Size	75000	
Pack style	Bottle	
Pack size	120	
Cur	INR Per Unit	INR per Pack
Exchange Rate	1	1
API Cost	₹ 11.08	₹ 1,329.1
Excipient	₹ 0.33	₹ 39.0
Pkg	₹ 0.19	₹ 23.3
Total Material cost	₹ 11.6	₹ 1,391.4
Overhead	₹ 59.61	7,153.29
Cost of production	₹ 71.2	₹ 8,544.6

Category	Mtl code	Description	Uom	Price	Input Qty per Tablet	CF	Yield Loss	Cost per pack
API	10000043	Capcitabine USP (Acebright, B.No. CPTF19025)	Kgs	21,043	500.0	1000000	5%	1,329.05
Excipient	10100068	Lactose anhydrous	Kgs	626	240.6	1000000	5%	19.02
Excipient	10100044	Croscarmellose sodium	Kgs	1,365	20.0	1000000	5%	3.45
Excipient	10100032	Hypromellose	Kgs	2,227	23.5	1000000	5%	6.60
Excipient	10100060	Colloidal silicon dioxide	Kgs	670	1.6	1000000	5%	0.13
Excipient	10100036	Magnesium stearate	Kgs	500	9.4	1000000	5%	0.59
Excipient	10100221	Opadry orange (02F530009)	Kgs	2,253	32.5	1000000	5%	9.25
Pkg	10200484	White HDPE bottle 150 CCHW/ 38mm neck	Ea	6.6	1.00	1	2%	6.73
Pkg	10300852	Capcitabin tab 500mg hdpe label 120,s	EA	1.59	1.00	1	2%	1.62
Pkg	10200480	White PP CT closure 38mm	Ea	3.07	1	1	2%	3.13
Pkg	10300854	Capcitabine tab.- Insert	Ea	1.16	1	1	2%	1.18
Pkg	10300853	Capcitabine tab. 500 mg- Printed monocation	Ea	5.75	1	1	2%	5.87
Pkg	10400167	3 ply Inner carton (Size: L300xW300x H100mm)	Ea	70	30	75,000	2%	3.43
Pkg	10400168	7 ply corrugated fiber outer shipper (Size: L630xW330xH100mm)	Ea	86	8	75000	2%	1.12
Pkg	10400062	Self adhesive bopp tape	Ea	49	2	75000	2%	0.16



ANNEXURE II - TOTAL OVERHEADS AS PER AUDITED FINANCIALS - FY21

Particulars	Cost per Annum
Man power Cost	23,94,90,867
Man power Cost- On Roll Factory	8,40,16,427
Man power Cost- (Off Roll) - Contract Factory	2,03,53,515
Man power Cost- On Roll - Corp. RA	3,03,28,703
Man power Cost- On Roll - Corp. RA	8,54,01,565
Man power Cost- (Off Roll) = Contract Corporate	1,93,50,658
Utilities Fixed	4,87,33,740
Utilities Variable	1,06,81,033
Finance Cost WC	2,97,40,577
Repairs and Maintenance(Plant)	2,26,50,30,958
Other Expenditure(Plant)	6,77,35,698
Quality Expenditure(Plant)	90,86,799
Depreciation	10,93,39,155
TOTAL OVER HEAD as per audited Financials (Profit & Loss A/c) for the financial year 20-21. Excluding	2,77,98,38,827

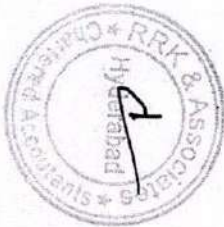
Particulars	No of Days	No of Lines	Total Days
Total days in a year	365	1	365
Weekly offs	43	1	43
Festival Holidays	8	1	8
Preventive and Break down maintenance 2 Days PM*12	4	1	4
Net working days in a year	310	1	310
No of hours per shift	8	1	8
No of shifts per day	3	1	3
Efficiency	95%	1	95%
Total No of Hours Available for each activity	7,068	1	7,068

Contribution Factor	Equipment Cost	Volume-M3 (AHU)	MPC	No of Shifts	Head Count	QC Expenditure	Capital Ratio	MPC Ratio On Roll	MPC Ratio Off Roll	QC Ratio	Utilities Ratio	Weighted Cost Ratio	Activity weight	Cost per Hour
Equipment							86%	3%	1%	0%	2%	93%	100%	
Granulation	1,73,92,530	222	2	1	2	1	25%	13%	6%	11%	19%	22%	24%	99,38
Compression	24,20,803	214	2	1	2	1	3%	13%	6%	11%	18%	4%	4%	17,16
Coating	1,02,02,505	150	1	1	1	1	14%	7%	3%	11%	13%	13%	14%	58,35
Visual Inspection	11,63,912	82	1	1	6	1	2%	7%	17%	11%	7%	2%	2%	8,65
Bottle Packing	93,92,557	47	2	1	10	1	13%	13%	28%	11%	4%	12%	13%	54,79



ANNEXURE III - Summary of Capcitabin product Activity time and operation cost for overhead calculation

Sl No	Activity	Operation-1	Lots	Process Hours	Batch size	Total Process time	Product change over and cleaning time	Total time	Activity Rate	Total Cost	Cost per tablet	No of Tablets per pack	C
1	Granulation	Process Time	1	10	75000	10	8	18	99,388	17,88,986	23.85	120	2
2	Compression	Units per Hour	1	10000	75000	7.5	8	15.5	17,161	2,65,996	3.55	120	2
3	Coating	No of Lots /Batch	2	8	75000	16	8	24	58,357	14,00,565	18.67	120	2
4	Visual Inspection	Process Time	1	8	75000	8	8	16	8,658	1,38,532	1.85	120	1
5	Bottle Packing	Units per Minut	1	8	75000	8	8	16	54,795	8,76,727	11.69	120	1
6	Total Cost per vial										59.61		7
7	Exchange Rate										82.00		
8	Total Over head Cost per Tablet and per pack										\$0.73		





RRK & Associates

Chartered Accountants

#A04, IFF The Annexe, 13th Phase
Near Hitech City Railway Station
KPHB, Hyderabad - 500 085, Telangana.
Ph. : 040 - 43768588, Cell : 90000 11445
E-mail : caradhakrishna@gmail.com

TO WHOMSOEVER IT MAY CONCERN

This is to certify that, following is the cost sheet of M/s Jodas Expoin Pvt Ltd for Capecitabine Tablets USP 500mg (120 Tablets #1 Bottle). This certificate is issued at the request of the client on the verification of cost records maintained by them.

Cost Sheet		
Market		
Customer	OOO JODAS - Russia	
Product Name	Capecitabine Tablets USP 500mg (120 Tablets #1 Bottle)	
Standard Batch size	75000	
Pack style	Vial	
Pack size	120	
Cost Components	USD per unit	USD per Pack
API	\$0.14	\$16.21
Excipient	\$0.00	\$0.48
Packing	\$0.00	\$0.28
Total Material cost	\$0.14	\$16.97
Overhead	\$0.73	\$87.24
Cost of production	\$0.87	\$104.20

Details as per Annexure I

For R R K & Associates
Chartered Accountants
Firm Reg.No. 009785S

R. Radha Krishna
Partner

M.No. 210777

Place: Hyderabad

Date: 13-10-2022

UDIN: 22210777AZOOJZ5966





RRK & Associates

Chartered Accountants

#A04, IFF The Annexe, 13th Phase

Near Hitech City Railway Station

KPHB, Hyderabad - 500 085, Telangana.

Ph. : 040 - 43768588, Cell : 90000 11445

E-mail : caradhakrishna@gmail.com

TO WHOMSOEVER IT MAY CONCERN

This is to certify that, following is the cost sheet of M/s Jodas Expoin Pvt Ltd for Flucanazole 2 mg per ml - 100 ml. This certificate is issued at the request of the client on the verification of cost records maintained by them.

Cost Sheet		
Market		
Customer	OOO JODAS - Russia	
Product Name	Flucanazole 2 mg per ml - 100 ml	
Standard Batch size	30000	
Pack style	Vial	
Pack size	1	
Cost Components	USD per unit	USD per Pack
Semifinished goods purchased price	\$0.32	\$0.32
Excepiant	\$0.00	\$0.00
Primary packing	\$0.00	\$0.00
Secondary packing	\$0.00	\$0.00
Teritiory packing	\$0.07	\$0.07
Filters	\$0.00	\$0.00
Conumsbles	\$0.00	\$0.00
Total Material cost	\$0.38	\$0.38
Overhead	\$6.28	\$6.28
Cost of production	\$6.67	\$6.67

Details as per Annexure I

For R R K & Associates
Chartered Accountants
Firm Reg.No. 009785S

R. Radha Krishna
Partner

M.No. 210777

Place: Hyderabad

Date: 13-10-2022

UDIN: 22210777AZONUZ6958



Annexure - I

Market	Russia				
Customer	OOO JODAS				
Product Name	Flucanazole 2 mg per ml - 100 ml				
Standard Batch size	30000				
Batch Size	30000				
Pack style	Vial				
Pack size	1				
Cur	INR per Unit	INR per pack	USD per unit	USD per Pack	
Exchange Rate	1	1	82	82	
No of Vials	1	1	1	1	
SFG Purchase Price	26.11	₹ 26.1	\$0.32	\$0.32	
Exceipient	-	₹ 0.0	\$0.00	\$0.00	
Prim. Pkg	-	₹ 0.0	\$0.00	\$0.00	
SPM	-	₹ 0.0	\$0.00	\$0.00	
TPM	5.41	₹ 5.4	\$0.07	\$0.07	
Filters	-	₹ 0.0	\$0.00	\$0.00	
Consumsibles	-	₹ 0.0	\$0.00	\$0.00	
Total Material cost	₹ 31.5	₹ 31.5	\$0.38	\$0.38	
Overhead	515.02	14.94	\$6.28	\$0.18	
Cost of production	₹ 546.5	₹ 46.5	\$6.67	\$6.67	

Category	Mtl code	Description	Uom	Price	Input Qty per Tablet	In put Qty UOM	CF	Yield Loss	Cost per pack	Cost per Tablet
API	11200027	Flucanazole 2mg/ml-100ML #1/PP BTL	Kgs	25.59	1	EA	1	2%	26.11	26.11
TPM	10301649	Fluconazole 2mg/ml-100ml Ptd bottl Label	NOS	0.55	1	EA	1	2%	0.56	0.56
TPM	10301650	Fluconazole 2mg/ml-100ml Ptd mono carton	NOS	3.2	1	EA	1	2%	3.27	3.27
TPM	10301570	Fluconazole 2mg/ml- ptd pack insert	NOS	0.7	1	EA	1	2%	0.71	0.71
TPM	10400203	out shipper size:420x270x305	NOS	78.0	305.0	EA	30000	2%	0.81	0.81
TPM	10400062	Bopp Self Adhesive Tapes	EA	49.0	37.0	EA	30000	2%	0.06	0.06





RRK & Associates

Chartered Accountants

#A04, IFF The Annexe, 13th Phase

Near Hitech City Railway Station

KPHB, Hyderabad - 500 085, Telangana.

Ph. : 040 - 43768588, Cell : 90000 11445

E-mail : caradhakrishna@gmail.com

TO WHOMSOEVER IT MAY CONCERN

This is to certify that, following is the cost sheet of M/s Jodas Expoin Pvt Ltd for Capecitabine Tablets USP 500mg (120 Tablets #1 Bottle). This certificate is issued at the request of the client on the verification of cost records maintained by them.

Cost Sheet		
Market		
Customer	OOO JODAS - Russia	
Product Name	Capecitabine Tablets USP 500mg (120 Tablets #1 Bottle)	
Standard Batch size	75000	
Pack style	Vial	
Pack size	120	
Cost Components	USD per unit	USD per Pack
API	\$0.14	\$16.21
Excipient	\$0.00	\$0.48
Packing	\$0.00	\$0.28
Total Material cost	\$0.14	\$16.97
Overhead	\$0.73	\$87.24
Cost of production	\$0.87	\$104.20

Details as per Annexure I

For R R K & Associates

Chartered Accountants

Firm Reg.No. 0097855

R. Radha Krishna

Partner

M.No. 210777

Place: Hyderabad

Date: 13-10-2022

UDIN: 22210777AZOOJZ5966



Annexure - I

Market	Russia			
Customer	OOO JODAS			
Product Name	Capecitabine Tablets USP 500mg (120 Tablets #1 Bottle			
Batch Size	75000			
Pack style	Bottle			
Pack size	120			
Cur	INR Per Unit	INR per Pack	USD per Unit	USD per Pack
Exchange Rate	1	1	82.00	82.00
API Cost	₹ 11.08	₹ 1,329.1	\$0.14	\$16.21
Excipient	₹ 0.33	₹ 39.0	\$0.00	\$0.48
Pkg	₹ 0.19	₹ 23.3	\$0.00	\$0.28
Total Material cost	₹ 11.6	₹ 1,391.4	\$0.14	\$16.97
Overhead	₹ 59.61	7,153.29	\$0.73	\$87.24
Cost of production	₹ 71.2	₹ 8,544.6	\$0.87	\$104.20

Category	Mtl code	Description	Uom	Price	Input Qty per Tablet	CF	Yield Loss	Cost per pack
API	10000043	Capecitabine USP (Acebright, B.No. CPTF19025)	Kgs	21,043	500.0	1000000	5%	1,329.05
Excipient	10100068	Lactose anhydrous	Kgs	626	240.6	1000000	5%	19.02
Excipient	10100044	Croscarmellose sodium	Kgs	1,365	20.0	1000000	5%	3.45
Excipient	10100032	Hypromellose	Kgs	2,227	23.5	1000000	5%	6.60
Excipient	10100060	Colloidal silicon dioxide	Kgs	670	1.6	1000000	5%	0.13
Excipient	10100036	Magnesium stearate	Kgs	500	9.4	1000000	5%	0.59
Excipient	10100221	Opadry orange (02F530009)	Kgs	2,253	32.5	1000000	5%	9.25
Pkg	10200484	White HDPE bottle 150 CCHW/ 38mm neck	Ea	6.6	1.00	1	2%	6.73
Pkg	10300852	Capecitabine tab 500mg hdpe label 120,s	EA	1.59	1.00	1	2%	1.62
Pkg	10200480	White PP CT closure 38mm	Ea	3.07	1	1	2%	3.13
Pkg	10300854	Capecitabine tab.- Insert	Ea	1.16	1	1	2%	1.18
Pkg	10300853	Capecitabine tab. 500 mg- Printed monocarton	Ea	5.75	1	1	2%	5.87
Pkg	10400167	3 ply inner carton (Size: L300xW300x H100mm)	Ea	70	30	75,000	2%	3.43
Pkg	10400168	7 ply corrugated fiber outer shipper (Size: L630xW330xH	Ea	86	8	75000	2%	1.12
Pkg	10400062	Self adhesive bopp tape	Ea	49	2	75000	2%	0.16





RRK & Associates

Chartered Accountants

#A04, IFF The Annexe, 13th Phase

Near Hitech City Railway Station

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Ph. : 040 - 43768588, Cell : 90000 11445

E-mail : caradhakrishna@gmail.com

TO WHOMSOEVER IT MAY CONCERN

This is to certify that, following is the cost sheet of M/s Jodas Expoin Pvt Ltd for Paracetamol 10 Mg 100 ML. This certificate is issued at the request of the client on the verification of cost records maintained by them.

Cost Sheet		
Market		
Customer	OOO JODAS - Russia	
Product Name	Paracetamol 10 Mg 100 ML	
Standard Batch size	39500	
Pack style	Vial	
Pack size	1	
Cost Components	USD per unit	USD per Pack
Semifinished goods purchased price	\$0.31	\$0.31
Excepiant	\$0.00	\$0.00
Primary packing	\$0.00	\$0.00
Secondary packing	\$0.00	\$0.00
Teritiory packing	\$0.06	\$0.06
Filters	\$0.00	\$0.00
Conumsbles	\$0.00	\$0.00
Total Material cost	\$0.37	\$0.37
Overhead	\$0.48	\$0.48
Cost of production	\$0.85	\$0.85

Details as per Annexure I

For R R K & Associates

Chartered Accountants

Firm Reg.No. 0097855

R. Radha Krishna

Partner

M.No. 210777

Place: Hyderabad

Date: 13-10-2022

UDIN: 22210777AZOOUI2682



Annexure - I

Market		Russia		
Customer		OOO JODAS		
Product Name		Paracetamol		
Standard Batch size		39500		
Batch Size		39500		
Pack style		Vial		
Pack size		1		
Cur				
Exchange Rate		INR per Unit	INR per pack	USD per unit
No of Vials	1	1	82	82
SFG	1	1	1	1
Exceptient	25.60	₹ 25.6	\$0.31	\$0.31
Prim. Pkg	-	₹ 0.0	\$0.00	\$0.00
SPM	-	₹ 0.0	\$0.00	\$0.00
TPM	-	₹ 0.0	\$0.00	\$0.00
Filters	4.76	₹ 4.8	\$0.06	\$0.06
Consumsibles	-	₹ 0.0	\$0.00	\$0.00
Total Material cost	-	₹ 0.0	\$0.00	\$0.00
Overhead	₹ 30.4	₹ 30.4	\$0.37	\$0.37
Cost of production	39.42	39.42	\$0.48	\$0.48
	₹ 69.8	₹ 69.8	\$0.85	\$0.85

Category	Mtl code	Description	Uom	Price	Input Qty per Tablet	In put Qty UOM	CF	Yield Loss	Cost per pack	Cost p Tablet
SFG	11200016	PARACETAMOL INFUSION 10MG 100ML/PP BTL	Kgs	25.09	1	EA	1	2%	25.60	
TPM	10301429	Paracetamol-10mg-100ml- mono cartons	NOS	3.0	1	EA	1	2%	3.06	
TPM	10301430	Paracetamol- inserts	NOS	0.4	1	EA	1	2%	0.39	
TPM	10301825	Paracetamol 10mg-100ml label(PP Bottle)	NOS	0.4	1	EA	1	2%	0.43	
TPM	10400203	Paracetamol out shipper size:420x270x305	NOS	78.0	405	EA	39500	2%	0.82	
TPM	10400062	Bopp Self Adhesive Tapes	EA	49.0	49	EA	39500	2%	0.06	



ANNEXURE - I

Jodas Expolm Private Limited _ PL Extract

Particulars	Amount (Rs)_FY 21	%	Amount (Rs)_FY 20	%	Amount (Rs)_FY 19	%	Amount (Rs)_FY 18	%	Amount (Rs)_FY
Sales	5,69,50,12,893		2,28,81,87,095		1,78,96,68,796		89,35,17,222	-	92,81,63
Other Income	78,46,620		12,18,32,299		4,98,50,404		5,65,37,913		3,39,52
Total Revenue	5,70,28,59,513		2,41,00,19,394		1,83,95,19,200		95,00,55,135		96,21,16
% growth in Sales (YoY)	149%		28%		100%		-4%		
COGS	1,59,82,82,106	28%	61,99,45,894	27%	66,45,63,729	37%	48,88,43,699	55%	61,89,10
Manufacturing Expenses	15,79,92,006	3%	9,88,05,848	4%	8,38,96,727	5%	6,86,82,619	8%	9,57,89
Employee Cost	23,94,90,867	4%	21,62,89,950	9%	21,41,46,224	12%	17,00,46,584	19%	10,52,26
Finance Cost	79,85,840	0%	1,27,49,431	1%	1,86,92,998	1%	1,42,34,646	2%	1,26,62
Depreciation and Amortization Expenses	10,93,39,155		9,67,49,956		8,79,30,975		5,45,88,980		2,47,47
Other Expenses	2,26,50,30,958	40%	80,96,30,174	35%	40,08,90,249	22%	7,57,60,000	8%	7,33,84
Total Expenses	4,37,81,20,933		1,85,41,71,253		1,47,01,20,902		87,21,56,528		93,07,21
Gross Margin	3,94,65,85,401	69%	1,69,12,67,652	74%	1,09,10,58,744	61%	39,25,28,817	44%	24,74,16
EBITA	1,44,20,63,576	25%	66,53,47,528	29%	47,60,22,271	27%	14,67,22,233	16%	6,88,04
PBT	1,32,47,38,580	23%	55,58,48,141	24%	36,93,98,298	21%	7,78,98,607	9%	3,13,94
PAT	1,01,16,34,324	18%	44,20,08,442	18%	28,10,01,499	15%	6,02,84,429	6%	2,10,34
Taxes	31,31,04,256	5%	11,38,39,699	5%	8,83,96,799	5%	1,76,14,178	2%	1,03,60



DIRECTORATE GENERAL OF FOREIGN TRADE

STATEMENT OF BANK REALISATION

1	Firm's Name	JODAS EXPOIM PRIVATE LIMITED
2	Address	Plot No 55 and 45 TSICBIOTECH Phase-III Karakapatla Contact No: 919676215947MEDAK MEDAK TELANGANA
3	IEC	0509067654
4	Shipping Bill No	4410235
5	Shipping Bill Date	2022-09-24
6	Shipping Bill Port	INNSA1
7	Bank's Name	HDFC BANK
8	Bank's File no and Uploaded Date	HDFC0000240030820239122023-08-03 12:05:07
9	Bill ID no	021BC76231000008
10	Bank Realisation Certificate No	HDFC0000021236647830 Dated 2023-08-03
11	Date of realisation of money by bank	2023-05-09
12	Realised value in Foreign Currency	198994.000
13	Currency of realisation	USD
14	Date &time of printing	2023-08-05 08:11:01 AM

About the statement

- This statement is machine generated from the DGFT website. It reproduces the information (as available on the date and time of printing of this statement) received by DGFT from the bank in secured electronic mode. This information can be verified by accessing the DGFT website(<https://www.dgft.gov.in>).

Note on the realised value

- The Realised value (item 12 above) is denominated in foreign Currency and may be in CIF, C&F or FOB terms as negotiated between exporter and buyer of the goods) and hence it may or may not include commission, Freight or Insurance as the case may be. Such details may be obtained from exporters, if needed. Policy Circular No. 06(RE- 2012) /2009-14 Dated 10.10.2012 of DGFT explains this in detail.

DGFT website: <https://www.dgft.gov.in>