आयुक्त, सीमा शुल्क का कार्यालय,
OFFICE OF THE COMMISSIONER OF CUSTOMS
न्यू कस्टम हाउस, बालाजी मंदिर के पास, न्यू कांडला-**370210**
NEW CUSTOMS HOUSE, NEAR BALAJI TEMPLE, NEW KANDLA-370210
E-mail : commr-cuskandla@nic.in

F. No.: GEN/ADJ/COMM/365/2026-Adjn-O/o Commr-Cus-Kandla
DIN-20260671ML0000818884

Show Cause Notice
(Issued Under Section 28(4) read with Section 124 of the Customs Act, 1962)

Whereas it appears that;

A specific intelligence was received in the office of the Directorate of Revenue Intelligence (Hqrs.), Plot No. - 11 B, Vasant Kunj Institutional Area, Vasant Kunj II, Vasant Kunj, New Delhi – 110070 (earlier at 7th Floor, Drum Shaped Building, I. P. Bhawan, I. P. Estate, New Delhi) (hereinafter referred to as 'DRI') which indicated undervaluation in the export of rice. The intelligence further indicated that after imposition of duty on export of rice with effect from 09.09.2022, several exporters, including **M/s Pagariya Exports Pvt. Ltd.,** Plot No. 19, House No.-1256/U1, Great Nag Road, Rambagh, Darshan Colony, Nandanvan, Nagpur-440018; bearing Importer Exporter Code (IEC) No. **ABECS8262N** (hereinafter referred to as 'the exporter' for the sake of brevity), were engaged in short payment of export duty by resorting to undervaluation by claiming abatement of duty from the assessable value. Thus, it appeared that export duty was not being paid on the transaction value of the export goods (i.e. FOB Value) as provided under section 14 of the Customs Act, 1962 but instead the same was being paid on a reduced value by wrongly declaring the same as FOB Value thus causing short-payment of the appropriate duty of Customs.

2. Preliminary analysis of the Intelligence revealed that export duty at the rate of 20% *ad valorem* was imposed on export of rice vide CBIC Notification No. 49/2022-Cus. dated 08.09.2022 and Notification No. 49/2023-Customs dated the 25.08.2023.

3.1 Scrutiny of the export data pertaining to the said exporter revealed a modus operandi as per which it appeared that they were evading duty on export of rice by adopting three different methods i.e. **(i)** by raising a separate invoice to the overseas buyer having actual transaction value which was other than the invoice having lesser value submitted to the Customs Authorities at the time of export, **(ii)** by declaring higher amount of ocean freight in the Shipping Bills to the Customs Authorities at the time of export **(iii)** by declaring higher amount of insurance premium in the Shipping Bills to the Customs Authorities at the time of export.

3.2 As per the modus operandi, it appeared that the exporter used to negotiate a specific price for sale of their export consignment which was received by them from the overseas buyer as **'consideration'** for sale of rice. This specific price which was the **'consideration/negotiated price'** appears to be **'the actual transaction value'** for their export consignment on which the exporter ought to have paid the 20% export duty. However, to evade duty, the exporter appears to have artificially bifurcated the afore-said negotiated price/total consideration, in two parts i.e. (i) **'price of goods'** and **(ii) 'export duty amount'**. The declarations made by the exporter indicate that they have declared the reduced value **'price of goods'** as their transaction value and the other part of the consideration which was equal to the **'export duty amount',** was not included by them in their **'transaction value'**.

3.3 As per the investigation, the exporter appears to have recovered **'the export duty amount'** separately from the overseas buyer without even declaring the same in their export invoice (submitted to customs authorities) by raising separate invoice to the buyer which was higher (by an amount equal to export duty paid amount) than the amount mentioned in the invoice submitted to the Customs Authorities. These excess amounts equal to the export duty so recovered from the overseas buyer were also part of their consideration for sale. Thus, the investigation suggests that a part of consideration, was not included in the transaction value for the payment of export duty in all such export shipments causing short payment of duty.

3.4 From the preliminary scrutiny of the export data, discussed in above paras, it appeared that the exporter had treated the actual transaction value (i.e. actual FOB Value) of their export goods as cum-duty FOB Value and they have declared the lesser transaction value in the shipping bills by wrongly claiming abatement of duty. By adopting the above-mentioned modus operandi, the exporter appears to have been evading the payment of duty on the differential value between the actual transaction value of the export goods (i.e. FOB Value) and their declared reduced FOB value.

3.5 Valuation of the goods is covered by Section 14 of the Customs Act, 1962 which provides that 'the value of the … export goods shall be **the transaction value** of such goods, that is to say, the price actually paid or payable for the goods when sold … for export from India **for delivery at the time and place of exportation**. **Further,** Customs Valuation (Determination of Value of Export Goods) Rules, 2007 (CVR, 2007) notified vide [M.F. (D.R.) Notification No. 95/2007-Cus (N.T.), dated-13-09-2007] also provide that value of the export goods shall be its transaction value. Rule 2 (1) (b) of the CVR, 2007 defines the term 'transaction value' as the value of export goods within the meaning of sub-section (1) of section 14 of the Customs Act, 1962. Further rule 3(1) of CVR, 2007 also stipulates that subject to rule 8 (providing for rejection of the declared value), the value of export goods shall be the transaction value. CVR, 2007 came into effect from 10.10.2007.

3.6 This practice of payment of export duty by treating the FOB Value as cum-duty FOB Value was prevalent prior to the year 2009. **CBIC Circular No. 18/2008-Cus. dated 10.11.2008** in this regard stipulated that with effect from 01.01.2009, the practice of computation of export duty shall be changed; that for the purposes of calculation of export duty, the transaction value, that is to say the price actually paid or payable for the goods for delivery at the time and place of exportation under section 14 of Customs Act 1962, shall be the FOB price of such goods at the time and place of exportation.

Initiation of investigation:

4. Pursuant to the afore-said intelligence and apparent undervaluation of the export goods, investigation was initiated against various exporters of the said commodity including **M/s Pagariya Exports Pvt. Ltd., Plot No. 19, House No.-1256/U1, Great Nag Road, Darshan Colony, Nandanvan, Nagpur-440018 (bearing Importer Exporter Code No. ABECS8262N),** by issuance of summons under the provisions of section 108 of the Customs Act, 1962.

5.1 Pursuant to summons dated 05.07.2024 and 10.04.2026 issued to M/s Pagariya Exports Pvt. Ltd. under Section 108 of the Customs Act, 1962, the exporter was called upon to produce documents relevant to the investigation. In compliance with the said summons, M/s Pagariya Exports Pvt. Ltd. submitted, vide email dated 25.07.2024 **(RUD-1),** 24.08.2024 **(RUD-2),** 16.04.2026 **(RUD-3),** and 24.04.2026 **(RUD-4),** 02.06.2026 **(RUD-5),** various documents pertaining to export of rice, including copies of shipping bills, export invoices issued to overseas buyers, Bank Realization Certificates (BRCs), freight invoices, insurance premium receipts, and other connected records.

(a) Vide summons dated 05.07.2024, M/s Pagariya Exports Pvt. Ltd. was called upon to submit copies of all export documents relating to a total of **622 export shipments** of dutiable rice exported during the period from September 2022 to July 2024. In response, vide email and letter dated 25.07.2024, the said exporter informed that it was in the process of collating the relevant export documents and information, and requested additional time for submission of the same. Thereafter, vide its further email dated 24.08.2024 **(RUD-2)**, the exporter submitted certain export documents.

(b) Vide email dated 24.08.2024 **(RUD-2)**, M/s Pagariya Exports Pvt. Ltd. submitted copies of certain export documents pertaining to exports of dutiable rice made during the period from September 2022 to July 2024, along with an Excel sheet containing details of these export shipments, including shipping-bill-wise payments received from overseas buyers and details of freight and insurance payments. However, vide summons dated 05.07.2024, the exporter had been specifically requested to submit the details of actual freight and insurance amounts paid by them. In the aforesaid email dated 24.08.2024 **(RUD-2)**, the exporter instead submitted details of freight and insurance amounts as declared by them in their export documents, not the actual amounts paid.

(c) Further, the export documents submitted vide email dated 24.08.2024 **(RUD-2)** were incomplete. For instance, copies of commercial invoices issued to overseas buyers were not furnished, and copies of freight invoices and insurance premium receipts in respect of several shipments were also not provided.

(d) Accordingly, vide summons dated 10.04.2026, Sh. Neel Umesh Pagariya and Sh. Umesh Raj Pagariya, both Directors of M/s Pagariya Exports Pvt. Ltd. were again requested to forward copies of all their export documents relating to exports of dutiable rice made during the period from September 2022 to October 2024, along with an Excel sheet containing details of the actual freight and insurance amounts paid by them in respect of all their 822 export shipments of rice.

(e) During the course of recording the statement of Sh. Neel Pagariya, Director of M/s Pagariya Exports Pvt. Ltd., under Section 108 of the Customs Act, 1962, he submitted that the exporter was segregating the export documents from their records and preparing their details in an Excel sheet for submission to the DRI office by 24.04.2026. In pursuance thereof, vide email dated 24.04.2026, all remaining export documents and information were submitted by M/s Pagariya Exports Pvt. Ltd. including a computation sheet in respect of all their 822 export shipments of rice, along with copies of the relevant export documents.

5.2 Therefore, vide emails dated 25.07.2024, 24.08.2024, 16.04.2026 and 24.04.2026 M/s Pagariya Exports Pvt. Ltd. also submitted an excel sheet containing details of total payments received from the overseas buyers (in Foreign Currency) which were reflected in their Bank Realization Certificates (BRCs), as well as payments received through reimbursement of taxes etc. They have also submitted the details of expenses made towards payment of ocean freight & insurance charges in respect of consignments exported on CF/ CI/ CIF Inco Term basis.

5.3 Further, Invoices submitted to the Customs Authorities at the time of export **(RUD-6)** were retrieved from the Customs e-Sanchit portal in respect of all of their **339** SBs.

5.4 Vide email dated 06.05.2026 & 07.05.2026 and letter dated 06.05.2026 (RUD-7), M/s Pagariya Exports Pvt. Ltd. forwarded duty payment challans for payment of differential duty of Rs. 15,48,04,625 on export of rice which was paid by them for exports made through seven different ports. The aforesaid payment of differential duty was made by them under protest.

5.5 Via **email dated 02.06.2026 (RUD-5)**, the exporter submitted that in respect of 27 shipments of rice (including two sample shipments), they had not recovered or claimed any export duty reimbursement amounts from the overseas buyers, and the entire export duty had already been paid by them at the time of export.

5.6 During investigation, copy of Show Cause Notice F. No. VIII(CUs)25-97/Cus-Adj/2025/2694-98 dated 31.07.2025 (RUD-8) issued by the Commissioner of Customs, Nagpur to M/s Pagariya Exports Pvt. Ltd. **was received which indicated that Nagpur Customs has issued SCN for demand of duty in respect of 245 Shipping Bills filed by** M/s Pagariya Exports Pvt. Ltd. at ICD, Mihan, ICD, Borkhedi, and ICD-Adani, all falling under the jurisdiction of Nagpur Customs.

5.7 Further 70 shipping bills were purged after filing under which no exports were made by M/s Pagariya Exports Pvt. Ltd. Moreover, in respect of **141** shipments of dutiable rice M/s Pagariya Exports Pvt. Ltd. had submitted that they have paid export duty under protest at the time of export at the port of export. In addition to the above, in respect of **27** shipments of rice (including 2 sample shipments), exported by M/s Pagariya Exports Pvt. Ltd., the exporter has submitted that they have not recovered any duty amount from the overseas buyers in respect of these 27 shipments.

5.8 Therefore, the above mentioned **483** (245+70+141+27) shipping bills filed by M/s Pagariya Exports Pvt. Ltd. are not being covered in this investigation report. Accordingly, this investigation report is only in respect of **339** shipments of dutiable rice exported by M/s Pagariya Exports Pvt. Ltd. through various ports.

6. During investigation, statement of Sh. Neel Pagariya (**RUD-9**), Director of M/s Pagariya Exports Pvt. Ltd. and Sh. Sudeep Madhusudan Kothari (**RUD-10**), Consultant (Accounts and Finance) of M/s Pagariya Exports Pvt. Ltd., were recorded under section 108 of the Customs Act, 1962 on **17.04.2026**.

6.1 Vide his statement, Sh. Neel Pagariya, Director of M/s. Pagariya Exports Pvt. Ltd., stated that he joined M/s. Pagariya Exports Pvt. Ltd. as Director of the company in the year 2022; that during the period from 2024 to 2025, he was in London, UK, for his studies; that he was not looking after any work in the company during that period; and that he looked after finance-related matters of the company, such as dollar booking, rice purchasing, and stocking. He further stated that they had two plants for sorting, grading, and processing of rice for exportation purposes, wherein they procured rice from rice millers and graded the rice as per the requirements of their overseas customers; that Nanji, Zainab, and Mariam are their own rice brands, which are registered in African countries; and that they also do domestic trading of rice in the Indian market, but the quantum of which is very less in comparison to their export volumes.

6.2 He further stated that he was a Director in M/s. Utex Industries Pvt. Ltd. also, which manufactured safety equipment such as harnesses, helmets, gloves, suits, etc., for the domestic construction industry; that M/s. Pagariya Exports Pvt. Ltd. was a family-owned company which was part of the Pagariya Group; that the group is into the restaurant business, IT business, hospital business, and commodity business.

6.3 M/s. Pagariya Exports Pvt. Ltd. was engaged mainly in the business of trading of agri-commodities such as rice (Non-Basmati), pulses, millets, etc.; that around 85% to 90% of the business of this company was export trading of non-Basmati rice only; that M/s. Pagariya Exports Pvt. Ltd. was incorporated in the year 2020, around December, only for the acquisition of the rice export business from M/s. Shah Nangi Nagsi Overseas Pvt. Ltd.; that around July 2022, the name of the company was changed to M/s. Pagariya Exports Pvt. Ltd.; that M/s. Pagariya Exports Pvt. Ltd. had acquired the rice export business of M/s. Shah Nangi Nagsi Exports Pvt. Ltd., which was conducted by them under the same name; that before the transfer of the business, the rice export work was separated from that company into a new company, namely M/s. Shah Nangi Nagsi Overseas Pvt. Ltd., which was then acquired by them; that while transferring/acquiring the business, all their rice brands were also acquired by them; that the said company was more than 100 years old; that they were engaged in the business of export of rice since 2012, and they had a good name in the African rice market.

6.4 Further, he stated that M/s. Pagariya Exports Pvt. Ltd. had been exporting rice since its incorporation; that they exported rice to around 40 countries; and that the main countries of export were South Africa, West Africa, Iran, Iraq, Sudan, and Russia, Ukraine. He further stated that in most of their export consignments, Dubai and Singapore-based companies purchased the rice from them, which was then delivered to different consignees, mainly based in African countries; that they received orders for shipment of goods from overseas buyers, then entered into a contract with the overseas buyer; that after execution of the contract, they procured rice from the domestic Indian market from rice millers who supplied them with dehusked rice; that they conducted sorting, grading, and polishing operations on rice in their own plant as per the requirements of overseas buyers; that packaging of the rice was conducted as per the requirements of overseas buyers; that thereafter, it was exported from the nearest port; that the shipping bill was filed by their CHA according to the documents provided by them to him; that the export goods were directly sent to the consignee; that they received payments against these exports from overseas buyers in their company bank account, on the basis of which the BRC was generated; that export remittances were received in EPC (Export Packaging Credit) Account (A/C No. 60393061648) of their company, maintained with Bank of Maharashtra, Sitaburdi, Nagpur Branch; that their current account (A/c No. 60385278482), maintained with Bank of Maharashtra, is registered at all ports; that the same current account is registered as an AD (Authorized Dealer) bank account; that the same current account has been provided by them to overseas buyers for making payments in respect of export of rice by their company; that in the SWIFT message received from the overseas buyer's bank account, their aforesaid current account is mentioned; **and that the work related to export of rice was mainly handled under the overall supervision of Sh. Raj Umesh Pagariya and Sh. Umesh Parasmal Pagariya, both Directors of the company, whose decision was final in all matters related to export of rice, including payment of export duty;** that he also looked after export-related work but was on study leave during the period from 2024 to 2025.

6.5 On being asked if he had submitted the documents related to the export of rice sought vide summons dated 05.07.2024, he stated that vide their email dated 24.08.2024, they had submitted scanned copies of export documents pertaining to the exports of dutiable rice made by their company during the period from September 2022 to July 2024, which were sought vide the summons dated 05.07.2024; that these documents were in respect of 685 shipments of rice; that they had also submitted an Excel sheet containing details of their 685 export shipments; that the details of actual ocean freight amounts and actual insurance amounts mentioned in the said Excel sheet were the ocean freight and insurance amounts which were declared by them in the shipping bills; that they had not submitted the actual freight and insurance amounts in the said Excel sheet; that the documents of 685 shipments submitted by them did not contain copies of the Bank Realization Certificates (BRCs) and Commercial Invoices raised by their company to the overseas buyer of rice, copies of freight invoices (in some shipments), and insurance premium receipts (in some shipments).

6.6 He further stated that in respect of the documents sought from their company vide the summons dated 10.04.2026, pertaining to the period from July, 2024 to October, 2024, they were segregating these documents from their records and preparing the details of the same in an excel sheet for submission to DRI; that these documents and details were not ready till date; that he would submit all these details and documents complete in all respect for all the 822 shipments of dutiable rice exported by them in a week’s time (i.e. by 24.04.2026).

6.7 He further stated that they had prepared an excel sheet containing details of the actual ocean freight and insurance amounts paid by them to the shipping line and insurance agency in respect of all the shipments exported on CIF/CF incoterm basis; that the shipments mentioned in the said list which were exported on CIF basis and for which no freight and insurance details had been mentioned in the said excel sheet were purged shipping bills for which no export record was found in their company records; that he is submitting a printout of this excel sheet consisting of **total 16 pages** serially numbered from Sr. No. 1 to 16 under his dated signatures.

6.8 Further, he was asked to go through the export documents submitted by him vide his email dated 24.08.2024, pertaining to the rice exported by their company vide Shipping Bill No. 5871631 dated 07.12.2023, i.e., copy of Purchase Contract No. SE23Y-00202 dated 30.10.2023 and Customs Invoice No. SR23Y-00371 dated 21.11.2023. He was asked to inform whether he had recovered the amount of Rs. 1,97,387 (which is equal to the customs duty paid by their company in respect of the said consignment) over and above the invoice amount of Rs. 9,86,934.51 in respect of the aforesaid consignment, since the Purchase Contract No. SE23Y-00202 dated 30.10.2023 clearly mentioned that the sale price of the said shipment is Rs. 11,84,321.25.

6.9 He answered that he had seen the export documents submitted vide email dated 24.08.2024, pertaining to the rice exported vide Shipping Bill No. 5871631 dated 07.12.2023, i.e., copy of Purchase Contract No. SE23Y-00202 dated 30.10.2023 and Customs Invoice No. SR23Y-00371 dated 21.11.2023; that they had recovered the amount of **Rs. 1,97,387** (which is equal to the customs duty paid by their company in respect of the said consignment) over and above the invoice amount of Rs. **9,86,934.51** in respect of the aforesaid consignment; that in respect of the aforesaid shipment, they had recovered **the entire contract amount** of **Rs. 11,84,321.25** from the overseas buyer of the export goods; that after the imposition of export duty on rice w.e.f. September 2022 till about 04.03.2024, they had recovered the entire export duty amount over and above the invoice amount from the overseas buyer of the export goods; that in all these shipments, they had recovered the entire contracted amount from the overseas buyer of the export goods, which was inclusive of the export duty amount; that in all these shipments, the contracted amounts were inclusive of the export duty amounts; that in the customs invoices, they had not mentioned the contracted amounts; instead, in the customs invoices submitted by them to the customs authorities at the port of export, **they had declared a lesser amount (by deducting the export duty paid amount from the contracted amount**); that in all these shipments filed till 04.03.2024, **they had issued a separate commercial invoice to the overseas buyer wherein they had declared the entire contracted amount;** that the entire contract amount had been received by them in respect of all these shipments filed during September 2022 to 04.03.2024 from the overseas buyer of the export goods; **that they had treated the said contract amount as cum-duty FOB value and paid the export duty on a lesser value, in such a way that the value of the customs invoice and customs duty paid amount was equal to the contracted value or Commercial Invoice/Invoice value;** that in all these shipments filed during September 2022 to 04.03.2024, they had issued **two types of export invoices—one was the customs invoice and the other was the commercial invoice; that the customs invoice was submitted by them to the customs authorities at the time of export, and the commercial invoice was issued by them to the overseas buyer for processing the receipt of the entire contracted amount from the overseas buyer of the exported rice;** and that the entire contracted amount received by them from the overseas buyer in respect of all such invoices was reflected in the BRC issued by the bank to their company.

6.10 He further stated that in respect of 261 shipments exported by them during the period from March, 2024 starting from SB No. 8040050 dated 04.03.2024 to SB No 4983483 dated 21.10.2024, they had paid the export duty on the entire contracted amount on their own and have not recovered the said export duty amount in respect of all these 261 shipments from the overseas buyer of the exported rice; that the said duty has been **paid by them under protest**; that in respect of **all these 261 shipments, they had submitted a letter to the customs authorities that the excess duty of 4% paid by them in respect of all these shipments were paid by them under protest**; **that in respect of the duty paid under protest, they had filed appeal before the Commissioner (Appeals) in respect of each such shipping bill.**

6.11 He was asked to go through the export documents submitted vide the email dated 24.08.2024, pertaining to the rice exported by their company vide Shipping Bill No. 4610612 dated 03.10.2022 for the export of 1,000 MTs of rice, and the attached export documents and Freight Invoice No. RBB-AS-0428102022 dated 28.10.2022; wherein, in the shipping bill, the ocean freight amount was mentioned as USD 84,500, and in the freight invoice, the freight amount was USD 79 per MT, i.e., USD 79,000 for 1,000 MTs of exported rice. He was asked to explain the reasons for the difference in ocean freight amounts in respect of the aforesaid shipment.

6.12 He answered that, in the shipping bill, the ocean freight amount was mentioned as **USD 84,500**, and in the freight invoice, the freight amount was USD 79 per MT, i.e., **USD 79,000** for 1,000 MTs of exported rice; that they had declared the higher ocean freight amounts in respect of the aforesaid shipment in the export documents; that they had recovered the entire freight amount of **USD 84,500** from the overseas buyer, whereas they had paid only **USD 79,000** to the shipping line towards ocean freight charges; that due to excess declaration of the freight amounts, there was short payment of duty on the excess freight amount of **USD 5,500** in respect of the aforesaid shipment. He agreed with the aforesaid differential duty liability and stated that they would calculate their entire differential duty liability on all such shipments wherein excess freight or insurance amounts had been declared by them in the shipping bills at the time of export; that they would pay the said differential duty liability at the earliest; that he had submitted an Excel sheet wherein the actual freight and insurance amounts paid by them had been mentioned; and that he would re-check the said Excel sheet and calculate their differential duty liability on the same and pay the said differential duty liability at the earliest.

6.13 On being asked what he meant by the term "FOB" used as an Incoterm for the sale of export goods in their export documents, he stated that FOB meant "Free on Board," and the said Incoterm indicated that the seller was required to load the goods onto the vessel after clearance from the customs authorities at the port of export; and that all the costs and expenses up to the loading of the goods onto the vessel were included in the FOB value of the export goods.

6.14 He was asked to review the printout of Incoterm 2020 as per Wikipedia, which indicates that all risks and costs up to the loading of the export goods on the vessel are to be borne by the seller of the export goods; that export clearance work, including payment of duty, was done before the loading of the export goods and before the issuance of the Let Export Order by the proper officer of customs. **On being asked to give his comments on the same,** he stated that he had gone through the printout of Incoterm 2020 and agreed that all costs and risks up to the loading of the export goods onto the vessel, after clearance from customs, were included in the FOB Incoterm; that, as per these Incoterms, all charges up to the loading of the export goods onto the vessel were mentioned to be included in the FOB Incoterm; that loading of the goods on the vessel starts after the Let Export Order was issued by the proper officer of customs, and the Let Export Order was issued when the export duty was paid; and that delivery of the export goods at the time and place of exportation is completed when the goods are loaded onto the foreign-going vessel, and the master of the vessel issues a bill of lading for the receipt of the export goods on board the vessel.

6.15 He was asked to go through the printout of Section 14 of the Customs Act, 1962, along with a copy of CBIC Circular No. 18/2008-Cus dated 10.11.2008, and give his comments on the same. He stated that, as per the said Section 14, the value of the export goods for payment of export duty shall be the transaction value of the export goods, i.e., the price paid or payable for delivery of the export goods at the time and place of exportation when price is the sole consideration; and that the CBIC Circular also provides that the value for charging export duty shall be the FOB value of the export goods, and, with effect from 01.01.2009, FOB value shall not be considered as cum-duty price.

6.16 He further stated that, on being shown the above printout of Section 14 and CBIC Circular No. 18/2008-Cus dated 10.11.2008, he had understood that, for payment of export duty, the transaction value of the goods has to be arrived at, and the transaction value of the export goods is the price of the goods inclusive of all expenses and costs up to the loading of the goods onto the vessel after clearance by the customs authority; that expenses for loading the export goods are incurred after payment of duty and customs clearance of the export goods; that, in their case, they had paid duty by considering the FOB Value as cum-duty FOB value instead of the actual FOB value of the export goods, causing short payment of duty on the export of rice; and that they would calculate their differential duty liability on account of the recovery of the duty amount from the overseas buyer separately through commercial invoices raised to the overseas buyers, and that they would try to deposit their entire differential duty liability at the earliest after discussing this issue with the other Directors of their company, who were his father and his elder brother.

7.1 In pursuance to the summons dated 10.04.2026 issued to Sh. Umesh Parasmal Pagariya, Sh. Sudeep Madhusudan Kothari, appeared in DRI office to make submissions and give explanations on his behalf under an authority letter dated 17.04.2026. Vide aforesaid authority letter, Sh. Umesh Parasmal Pagariya, Director of M/s. Pagariya Exports Pvt. Ltd., undertook to remain bound by the said authorized representative's statement made by him in the course of proceedings. Accordingly, statement of Sh. Sudeep Madhusudan Kothari, was recorded under the provisions of section 108 of the Customs Act, 1962 on 17.04.2026.

7.1.1 Vide his statement dated 17.04.2026, Sh. Sudeep Madhusudan Kothari, Consultant (Accounts and Finance) of M/s. Pagariya Exports Pvt. Ltd., stated that he joined M/s. Pagariya Exports Pvt. Ltd. as Consultant (Accounts and Finance) of the company in the year 2021; **that he looked after the day-to-day business of the company related to accounts and finance, banking, including the work related to the export of rice; that he advised the directors of the company in all day-to-day matters related to accounts, finance, and banking; that the export-related work of this company was handled under the overall directions of all three directors of the company; and that employees of the company assisted the directors in this work.**

7.2 Further, he stated that vide their email dated 24.08.2024, they had submitted scanned copies of export documents pertaining to the exports of dutiable rice made by their company during the period from September 2022 to July 2024, which were sought vide summons dated 05.07.2024; that they had also submitted an Excel sheet containing details of 685 export shipments; that the details of actual ocean freight amounts and actual insurance amounts mentioned in the said Excel sheet were the ocean freight and insurance amounts which were declared by them in the shipping bills; that they had not submitted the actual freight and insurance amounts in the said Excel sheet; that the documents of 685 shipments submitted by them did not contain copies of the Bank Realization Certificates (BRCs) and Commercial Invoices raised by their company to the overseas buyer of rice, copies of freight invoices (in some shipments), and insurance premium receipts (in some shipments); that, in respect of the documents sought from their company vide summons dated 10.04.2026, pertaining to the period from July 2024 to October 2024, they were segregating these documents from their records and preparing the details of the same in an Excel sheet for submission; that these documents and details were not ready till date; and that he would submit all these details and documents, complete in each respect, for all 822 shipments of dutiable rice exported by them, within a week's time.

7.3 Further, he stated that they had prepared an Excel sheet containing details of the actual ocean freight and insurance amounts paid by them to the shipping line and insurance agency in respect of all the shipments exported on CIF/CFR Incoterm basis; that the shipments mentioned in the said list, which were exported on CIF basis and for which no freight and insurance details had been mentioned in the said Excel sheet, were purged shipping bills, for which no export record was found in their company records.

7.4 Further, he was asked to go through the export documents submitted by him vide the email dated 24.08.2024, pertaining to the rice exported by their company vide Shipping Bill **No. 5871631 dated 07.12.2023**, i.e., copy of Purchase Contract No. SE23Y-00202 dated 30.10.2023 and Customs Invoice No. SR23Y-00371 dated 21.11.2023. He was asked to inform whether they had recovered the amount of **Rs. 1,97,387** (which is equal to the customs duty paid by their company in respect of the said consignment) over and above the invoice amount of **Rs. 9,86,934.51** in respect of the aforesaid consignment, whereas in Purchase Contract No. SE23Y-00202 dated 30.10.2023, it has been clearly mentioned that the sale price of the said shipment **is Rs. 11,84,321.25.**

7.5 He answered that he had seen the export documents submitted vide email dated 24.08.2024, pertaining to the rice exported vide Shipping Bill No. 5871631 dated 07.12.2023, i.e., copy of Purchase Contract No. SE23Y-00202 dated 30.10.2023 and Customs Invoice No. SR23Y-00371 dated 21.11.2023; that they had recovered the amount of Rs. 1,97,387 (which is equal to the customs duty paid by their company in respect of the said consignment) over and above the invoice amount of Rs. 9,86,934.51 in respect of the aforesaid consignment; that, in respect of the aforesaid shipment, **they had recovered the entire contract amount of Rs. 11,84,321.25 from the overseas buyer of the export goods**; that after the imposition of export duty on rice w.e.f. September 2022 till about 04.03.2024, they had recovered the entire export duty amount over and above the invoice amount from the overseas buyer of the export goods; that, in all these shipments, they had recovered the entire contracted amount from the overseas buyer of the export goods, which was inclusive of the export duty amount; **that, in all these shipments, the contracted amounts were inclusive of the export duty**

amounts; that, in the customs invoices, they had not mentioned the contracted amounts; instead, in the customs invoices submitted by them to the customs authorities at the port of export, they had declared a lesser amount (by deducting the export duty paid amount from the contracted amount); **that, in all these shipments filed till 04.03.2024, they had issued a separate commercial invoice to the overseas buyer wherein they had declared the entire contracted amount;** that the entire contract amount had been received by them in respect of all these shipments filed during September 2022 to 04.03.2024 from the overseas buyer of the export goods; **that they had treated the said contract amount as cum-duty FOB value and paid the export duty on a lesser value, in such a way that the value of the customs invoice and customs duty paid amount was equal to the contracted value or Commercial Invoice/Invoice value;** that, in all these shipments filed during September 2022 to 04.03.2024, **they had issued two types of export invoices—one was the customs invoice and the other was the commercial invoice; that the customs invoice was submitted by them to the customs authorities at the time of export, and the commercial invoice was issued by them to the overseas buyer for processing the receipt of the entire contracted amount from the overseas buyer of the exported rice;** and that the entire contracted amount received by them from the overseas buyer in respect of all such invoices was reflected in the BRC issued by the bank to their company.

7.6 He further stated that, in respect of 261 shipments exported by them during the period from March 2024, starting from SB No. 8040050 dated 04.03.2024 to SB No. 4983483 dated 21.10.2024, they had paid the export duty on the entire contracted amount on their own and had not recovered the said export duty amount in respect of all these 261 shipments from the overseas buyer of the exported rice; **that the said duty had been paid by them under protest**; **that, in respect of all these 261 shipments, they had submitted a letter to the customs authorities that the excess duty of 4% paid by them in respect of all these shipments was paid by them under protest;** and that, in respect of the duty paid under protest, they had filed an appeal before the Commissioner (Appeals) in respect of each such shipping bill.

7.7 He was asked to go through the export documents submitted vide the email dated 24.08.2024, pertaining to the rice exported by their company vide Shipping Bill No. 4610612 dated 03.10.2022 for the export of 1,000 MTs of rice, and the attached export documents and Freight Invoice No. RBB-AS-0428102022 dated 28.10.2022; wherein, in the shipping bill, the ocean freight amount was mentioned as USD 84,500, and in the freight invoice, the freight amount was USD 79 per MT, i.e., USD 79,000 for 1,000 MTs of exported rice. He was asked to explain the reasons for the difference in ocean freight amounts in respect of the aforesaid shipment.

7.8 He answered that, in the shipping bill, the ocean freight amount was mentioned as USD 84,500, and in the freight invoice, the freight amount was USD 79 per MT, i.e., USD 79,000 for 1,000 MTs of exported rice; that they had declared the higher ocean freight amounts in respect of the aforesaid shipment in the export documents; that they had recovered the entire freight amount of **USD 84,500** from the overseas buyer, whereas they had paid only **USD 79,000** to the shipping line towards ocean freight charges; and that, due to excess declaration of the freight amounts, there was short payment of duty on the excess freight amount of **USD 5,500** in respect of the aforesaid shipment. He agreed with the aforesaid differential duty liability and stated that they would calculate their entire differential duty liability on all such shipments wherein excess freight or insurance amounts had been declared by them in the shipping bills at the time of export; that they would pay the said differential duty liability at the earliest; that he had submitted an Excel sheet wherein the actual freight and insurance amounts paid by them had been mentioned; and that he would re-check the said Excel sheet and calculate their differential duty liability on the same and pay the said differential duty liability at the earliest.

7.9 On being asked what he meant by the term "FOB" used as an Incoterm for the sale of export goods in their export documents, he stated that FOB meant "Free on Board," and the said Incoterm indicated that the seller was required to load the goods onto the vessel after clearance from the customs authorities at the port of export; and that all the costs and expenses up to the loading of the goods onto the vessel were included in the FOB value of the export goods.

7.10 He was asked to review the printout of Incoterm 2020 as per Wikipedia, which indicates that all risks and costs up to the loading of the export goods on the vessel are to be borne by the seller of the export goods; that export clearance work, including payment of duty, was done before the loading of the export goods and before the issuance of the Let Export Order by the proper officer of customs. **On being asked to give his comments on the same**, he stated that he had gone through the printout of Incoterm 2020 and agreed that all costs and risks up to the loading of the export goods onto the vessel, after clearance from customs, were included in the FOB Incoterm; that, as per these Incoterms, all charges up to the loading of the export goods onto the vessel were mentioned to be included in the FOB Incoterm; that loading of the goods on the vessel starts after the Let Export Order was issued by the proper officer of customs, and the Let Export Order was issued when the export duty was paid; and that delivery of the export goods at the time and place of exportation is completed when the goods are loaded onto the foreign-going vessel, and the master of the vessel issues a bill of lading for the receipt of the export goods on board the vessel.

7.11 He was asked to go through the printout of Section 14 of the Customs Act, 1962, along with a copy of CBIC Circular No. 18/2008-Cus dated 10.11.2008, and give his comments on the same. He stated that, as per the said Section 14, the value of the export goods for payment of export duty shall be the transaction value of the export goods, i.e., the price paid or payable for delivery of the export goods at the time and place of exportation when price is the sole consideration; and that the CBIC Circular also provides that the value for charging export duty shall be the FOB value of the export goods, and, with effect from 01.01.2009, FOB value shall not be considered as cum-duty price.

7.12 He further stated that, on being shown the above printout of Section 14 and CBIC Circular No. 18/2008-Cus dated 10.11.2008, he had understood that, for payment of export duty, the transaction value of the goods has to be arrived at, and the transaction value of the export goods is the price of the goods inclusive of all expenses and costs up to the loading of the goods onto the vessel after clearance by the customs authority; that expenses for loading the export goods are incurred after payment of duty and customs clearance of the export goods; that, in their case, they had paid duty by considering the FOB Value as cum-duty FOB value instead of the actual FOB value of the export goods, causing short payment of duty on the export of rice; and that they would calculate their differential duty liability on account of the recovery of the duty amount from the overseas buyer separately through commercial invoices raised to the overseas buyers, and they would try to deposit their entire differential duty liability at the earliest after discussing this issue with the Directors of their company.

7.13 Vide their letter and email dated 07.05.2026 **(RUD-7),** M/s. Pagariya Exports Pvt. Ltd. submitted 07 challans/receipts towards differential export duty payments of **Rs. 15,48,04,625/-** in respect of their shipments (Shipping Bills) wherein duty reimbursements were separately recovered by them from the buyers and excess freight/insurance amounts were declared by them in their export documents. The port-wise differential export duty paid by M/s. Pagariya Exports Pvt. Ltd. is detailed below:

Sr. No.	Port Code	Challan No.	Duty Amount in Rs.
1	INBOK6	8001534620	39,00,535
2	INIXY1	7192209566	6,48,53,127
3	INKRI1	1483016444	34,69,949
4	INKPK6	2783377727	2,84,99,906
5	INMUN1	2079824733	1,48,31,087
6	INNSA1	9077498536	78,549
7	INVTZ1	1391162282	3,91,71,472
			15,48,04,625

8. The export documents and details submitted by the exporter during investigation were analysed and the analysis revealed that –

i) M/s Pagariya Exports Pvt. Ltd. has mis-declared the transaction value / assessable value of the export goods covered under 339 Shipments of Rice, exported during the period from September 2022 to October 2024.

ii) During investigation, the details of total 822 shipments of rice were sought from the exporter through various summons and communications, as discussed in above paras. In response the documents, along with details were submitted by the exporter. The exporter has submitted that in respect of 27 shipments they have not taken any reimbursement of export duty from the buyers and have paid export duty on their own account; that in respect of 339 shipments they have recovered the duty reimbursement from their overseas buyers; that in respect of 141 shipments they have paid duty on the actual FOB value of their export Goods on their own account but under protest and have filed appeals before the jurisdictional authorities of customs. The details of the shipments sought and covered in this investigation report are appended below:

	No of Shipments	Remarks
Documents sought vide summons dated 05.07.2024 from the exporter.	622 SBs	Details of total 622 SBs were sought.
Documents sought vide summons dated 10.04.2026 from the exporter.	822 SBs	Details of 822 SBs, including the above mentioned 622 SBs, were sought.

Total SBs	**822 SBs**	**In view of the above, documents/details in respect of 822 SBs were submitted by the exporter.**
SBs not covered in this investigation for demand of duty.	245 SBs	SCN in respect of these 245 SBs was issued by Nagpur Customs vide F. No.VIII(CUs)25-97/Cus-Adj/2025/2694-98 dated 31.07.2025. **Hence, these 245 SBs are not covered in investigation.**
	141 SBs	In respect of **261 SBs** of dutiable rice M/s Pagariya Exports Pvt. Ltd. had submitted that they have paid export duty under protest at the time of export. 120 out of these 261 SBs have been covered in SCN dated 31.07.2025, issued by the Nagpur Customs. **Hence, remaining 141 SBs pertaining to other ports are also not covered in this investigation.**
	70 SBs	The exporter has submitted that 70 SBs were purged after filing. Therefore, no exports were made by M/s Pagariya Exports Pvt. Ltd. under these 70 SBs. **Hence, these 70 SBs are also not covered in this investigation.**
	27 SBs	In respect of 27 SBs, the exporter has submitted that they have not recovered any duty amount from the overseas buyers in respect of these 27 shipments. **Hence, these 27 SBs are also not covered in this investigation.**
In view of the above, out of total 822 SBs, 483 SBs are not covered for demand of duty in this investigation report.		
SBs covered in this Investigation	339 SBs	In these 339 SBs, the investigation revealed that the exporter has claimed and recovered the export duty amounts over and above the invoice amounts from the foreign buyer through **separate invoices. Hence, these 339 SBs are covered in this investigation for demand of duty** on export duty amounts so recovered from the buyer. In 72 out of these 339 SBs, the exporter has also declared the excess freight amounts in the SBs. **Hence, these 72 SBs are covered in this investigation for demand of duty on excess freight amounts also.**
Therefore, this investigation report pertains to 339 shipments/SBs of rice exported by M/s Pagariya Exports Pvt. Ltd. as discussed in below paras.		

8.1 M/s Pagariya Exports Pvt. Ltd., had exported shipment of rice having description as ‘Brown Rice (Non Basmati) / IR-64 Parboiled Rice / Indian Common Parboiled Rice / Indian Long Grain Parboiled Rice / Indian IR-64 White Rice/ Indian Long Grain White Rice / Indian Medium Grain White Rice / Indian White Rice (Non-Basmati)’ etc. by classifying the same under CTH 10062000, 10063010 & 10063090 which were liable to export duty @ 20%/10% *ad valorem* vide CBIC Notification No. 49/2022-Cus. dated 08.09.2022, 49 /2023-Customs dated the 25th August, 2023 and Notification No. 44/2024-Customs dated 27.09.2024. Their export documents (Shipping Bills) reflect that they have declared the following three values

(i) Total Value, (ii) Invoice Value and (iii) FOB Value. **The Total Value** and **Invoice Value declared by them were same and these values** appear to have been declared after deducting from the transaction value, an amount equal to the export duty amount paid by them in respect of the export goods. Further, the **FOB Value** appears to be declared after deduction of the ocean freight amounts and insurance amounts (wherever applicable) from the afore-said Invoice Value/Total Value. Thus, the declarations made indicate that a total amount of export duty of **Rs. 77,56,89,699/-** paid by them at the time of export were suppressed by the exporter from the actual FOB Value in respect of their **339** export shipments as shown below:

8.2 Excess amounts recovered from the overseas buyer by raising a separate commercial invoice, other than the custom purpose invoice, to the overseas buyer which included the export duty paid amount:

In respect of the following **339** shipments, the exporter prepared two sets of export invoices for the same consignments. One set of invoices was submitted to the customs authorities and did not contain the amount of export duty paid by them. The other set of invoices, which reflected the total value inclusive of the export duty amount paid by the exporter, was sent to the overseas buyer. In respect of these export shipments, they appear to have claimed the complete transaction value from the overseas buyer in lieu of a separate commercial invoice. Thus, it appears that the exporter claimed and recovered additional amounts, over and above the amounts declared to the Customs, from the overseas buyer in lieu of duty paid at the time of export. The total duty-paid amounts claimed and recovered by the exporter in respect of these **339** shipments, over and above the invoice value declared to the Customs Authorities at the port of export, stood at **Rs. 77,56,89,699/-.**

Table-A

S. No.	Custom House Code	SB NUMBER	SB DATE	Declared FOB Value (in Rs.)	Duty / Cess Rate ADV (in %)	CESS/ Export duty paid Amount (In Rs.)	Excess amount claimed/ recovered from the buyers through separate commercial invoices (In Rs.)	Export duty payable on excess amounts claimed and recovered through the separate commercial invoices sent to the buyers
	Col.1	Col.2	Col.3	Col.5	Col.4	Col.6	Col.7	Col.8 =

								Col.7*20 %
1	INBOK 6	1024541	15-05-2023	80,61,554	20	16,12,311	16,12,311	3,22,462
2	INBOK 6	1450985	01-06-2023	32,41,613	20	6,48,323	6,48,323	1,29,665
3	INBOK 6	6259559	19-12-2022	1,15,03,125	20	23,00,625	23,00,625	4,60,125
4	INBOK 6	6325087	21-12-2022	49,92,300	20	9,98,460	9,98,460	1,99,692
5	INBOK 6	6355355	22-12-2022	48,35,651	20	9,67,130	9,67,130	1,93,426
6	INBOK 6	6446879	26-12-2022	69,91,225	20	13,98,245	13,98,245	2,79,649
7	INBOK 6	6468272	27-12-2022	69,91,225	20	13,98,245	13,98,245	2,79,649
8	INBOK 6	6509858	28-12-2022	41,94,735	20	8,38,947	8,38,947	1,67,789
9	INBOK 6	6632118	02-01-2023	20,70,563	20	4,14,113	4,14,113	82,823
10	INBOK 6	6694527	04-01-2023	58,19,802	20	11,63,960	11,63,960	2,32,792
11	INBOK 6	7941711	21-02-2023	42,90,826	20	8,58,165	8,58,165	1,71,633
12	INBOK 6	7978856	22-02-2023	70,83,875	20	14,16,775	14,16,775	2,83,355
13	INBOK 6	8154599	01-03-2023	72,05,300	20	14,41,060	14,41,060	2,88,212
14	INBOK 6	8602574	20-03-2023	74,67,694	20	14,93,539	14,93,539	2,98,708
15	INBOK 6	9505149	24-04-2023	81,16,394	20	16,23,279	16,23,279	3,24,656
16	INBOK 6	9969216	12-05-2023	99,10,768	20	19,82,154	19,82,154	3,96,431
17	INCCU 1	5871631	07-12-2023	9,86,935	20	1,97,387	1,97,387	39,477
18	INCCU 1	6208578	21-12-2023	99,93,758	20	19,98,752	19,98,752	3,99,750
19	INCCU 1	6210523	21-12-2023	99,93,758	20	19,98,752	19,98,752	3,99,750
20	INIXY1	4610353	03-10-2022	2,32,50,691	20	46,50,138	46,50,138	9,30,028
21	INIXY1	4610391	03-10-2022	2,32,50,691	20	46,50,138	46,50,138	9,30,028
22	INIXY1	4610393	03-10-2022	2,32,50,691	20	46,50,138	46,50,138	9,30,028
23	INIXY1	4610426	03-10-2022	2,32,50,691	20	46,50,138	46,50,138	9,30,028
24	INIXY1	46106	03-10-	1,27,07,28	20	25,41,4	25,41,45	5,08,291

		04	2022	4		57	7	
25	INIXY1	46106 12	03-10- 2022	2,52,17,85 2	20	50,43,5 70	50,43,57 0	10,08,71 4
26	INIXY1	53893 14	11-11- 2022	2,38,73,81 6	20	47,74,7 63	47,74,76 3	9,54,953
27	INIXY1	53893 45	11-11- 2022	1,19,36,90 8	20	23,87,3 82	23,87,38 2	4,77,476
28	INIXY1	53893 47	11-11- 2022	2,36,00,47 0	20	47,20,0 94	47,20,09 4	9,44,019
29	INIXY1	53893 99	11-11- 2022	2,36,00,47 0	20	47,20,0 94	47,20,09 4	9,44,019
30	INIXY1	54243 91	12-11- 2022	2,98,42,27 0	20	59,68,4 54	59,68,45 4	11,93,69 1
31	INIXY1	54741 77	15-11- 2022	2,38,73,81 6	20	47,74,7 63	47,74,76 3	9,54,953
32	INIXY1	54741 84	15-11- 2022	2,38,73,81 6	20	47,74,7 63	47,74,76 3	9,54,953
33	INIXY1	55769 83	19-11- 2022	1,16,27,75 9	20	23,25,5 52	23,25,55 2	4,65,110
34	INIXY1	55769 84	19-11- 2022	1,16,27,75 9	20	23,25,5 52	23,25,55 2	4,65,110
35	INIXY1	55925 02	20-11- 2022	1,16,27,75 9	20	23,25,5 52	23,25,55 2	4,65,110
36	INIXY1	55925 04	20-11- 2022	1,16,27,75 9	20	23,25,5 52	23,25,55 2	4,65,110
37	INIXY1	56658 17	23-11- 2022	6,23,61,76 5	20	1,24,72, 353	1,24,72,3 53	24,94,47 1
38	INIXY1	57003 20	24-11- 2022	25,03,19,9 71	20	5,00,63, 994	5,00,63,9 94	1,00,12,7 99
39	INIXY1	57292 37	25-11- 2022	1,21,26,42 9	20	24,25,2 86	24,25,28 6	4,85,057
40	INIXY1	57766 53	28-11- 2022	1,21,26,42 9	20	24,25,2 86	24,25,28 6	4,85,057
41	INIXY1	57777 86	28-11- 2022	1,21,26,42 9	20	24,25,2 86	24,25,28 6	4,85,057
42	INIXY1	57819 29	28-11- 2022	1,21,26,42 9	20	24,25,2 86	24,25,28 6	4,85,057
43	INIXY1	58628 98	01-12- 2022	2,32,55,51 8	20	46,51,1 04	46,51,10 4	9,30,221
44	INIXY1	58628 99	01-12- 2022	2,32,55,51 8	20	46,51,1 04	46,51,10 4	9,30,221
45	INIXY1	58629 00	01-12- 2022	2,52,77,66 9	20	50,55,5 34	50,55,53 4	10,11,10 7
46	INIXY1	58629 03	01-12- 2022	2,32,55,51 8	20	46,51,1 04	46,51,10 4	9,30,221
47	INIXY1	58645 12	01-12- 2022	2,32,55,51 8	20	46,51,1 04	46,51,10 4	9,30,221
48	INIXY1	58764 68	02-12- 2022	1,15,41,52 1	20	23,08,3 04	23,08,30 4	4,61,661

49	INIXY1	5876496	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
50	INIXY1	5876501	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
51	INIXY1	5876526	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
52	INIXY1	5878635	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
53	INIXY1	5878640	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
54	INIXY1	5878641	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
55	INIXY1	5878667	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
56	INIXY1	5879952	02-12-2022	2,30,83,042	20	46,16,608	46,16,608	9,23,322
57	INIXY1	5884475	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
58	INIXY1	5885297	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
59	INIXY1	5888626	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
60	INIXY1	5893281	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
61	INIXY1	5893485	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
62	INIXY1	5893658	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
63	INIXY1	5893755	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
64	INIXY1	5893945	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
65	INIXY1	5894123	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
66	INIXY1	5894606	02-12-2022	1,25,45,098	20	25,09,020	25,09,020	5,01,804
67	INIXY1	5896048	02-12-2022	1,15,41,521	20	23,08,304	23,08,304	4,61,661
68	INIXY1	5896052	02-12-2022	1,25,45,098	20	25,09,020	25,09,020	5,01,804
69	INIXY1	5896106	02-12-2022	2,33,50,395	20	46,70,079	46,70,079	9,34,016
70	INIXY1	5896122	02-12-2022	2,33,50,395	20	46,70,079	46,70,079	9,34,016
71	INIXY1	5896966	02-12-2022	2,33,50,395	20	46,70,079	46,70,079	9,34,016
72	INIXY1	5896970	02-12-2022	2,91,87,993	20	58,37,599	58,37,599	11,67,520
73	INIXY1	58969	02-12-	2,33,50,39	20	46,70,0	46,70,07	9,34,016

		72	2022	5		79	9	
74	INIXY1	6783051	07-01-2023	3,76,91,288	20	75,38,258	75,38,258	15,07,652
75	INIXY1	6785769	07-01-2023	2,71,75,922	20	54,35,184	54,35,184	10,87,037
76	INIXY1	6785974	07-01-2023	1,25,63,763	20	25,12,753	25,12,753	5,02,551
77	INIXY1	6786252	07-01-2023	1,25,63,763	20	25,12,753	25,12,753	5,02,551
78	INIXY1	6786497	07-01-2023	1,25,63,763	20	25,12,753	25,12,753	5,02,551
79	INIXY1	6786590	07-01-2023	1,25,63,763	20	25,12,753	25,12,753	5,02,551
80	INIXY1	6787181	07-01-2023	1,25,63,763	20	25,12,753	25,12,753	5,02,551
81	INIXY1	6788231	07-01-2023	1,35,87,961	20	27,17,592	27,17,592	5,43,518
82	INIXY1	6788262	07-01-2023	1,35,87,961	20	27,17,592	27,17,592	5,43,518
83	INIXY1	6808428	09-01-2023	1,29,05,429	20	25,81,086	25,81,086	5,16,217
84	INIXY1	6808483	09-01-2023	1,29,05,429	20	25,81,086	25,81,086	5,16,217
85	INIXY1	6808484	09-01-2023	1,29,05,429	20	25,81,086	25,81,086	5,16,217
86	INIXY1	6808494	09-01-2023	1,29,05,429	20	25,81,086	25,81,086	5,16,217
87	INIXY1	6808521	09-01-2023	1,29,05,429	20	25,81,086	25,81,086	5,16,217
88	INIXY1	6808555	09-01-2023	1,29,05,429	20	25,81,086	25,81,086	5,16,217
89	INIXY1	6808596	09-01-2023	1,29,05,429	20	25,81,086	25,81,086	5,16,217
90	INIXY1	6809039	09-01-2023	1,29,05,429	20	25,81,086	25,81,086	5,16,217
91	INIXY1	6812547	09-01-2023	1,28,36,948	20	25,67,390	25,67,390	5,13,478
92	INIXY1	6812549	09-01-2023	1,28,36,948	20	25,67,390	25,67,390	5,13,478
93	INIXY1	6812561	09-01-2023	1,28,36,948	20	25,67,390	25,67,390	5,13,478
94	INIXY1	6812562	09-01-2023	1,28,36,948	20	25,67,390	25,67,390	5,13,478
95	INIXY1	6812563	09-01-2023	1,28,36,948	20	25,67,390	25,67,390	5,13,478
96	INIXY1	6812573	09-01-2023	1,28,36,948	20	25,67,390	25,67,390	5,13,478
97	INIXY1	6812641	09-01-2023	1,28,36,948	20	25,67,390	25,67,390	5,13,478

98	INIXY1	6812648	09-01-2023	1,28,36,948	20	25,67,390	25,67,390	5,13,478
99	INIXY1	6812662	09-01-2023	1,28,36,948	20	25,67,390	25,67,390	5,13,478
100	INIXY1	6813283	09-01-2023	1,28,36,948	20	25,67,390	25,67,390	5,13,478
101	INKPK6	1172456	20-05-2023	1,39,31,594	20	27,86,319	27,86,319	5,57,264
102	INKPK6	1221919	23-05-2023	26,97,310	20	5,39,462	5,39,462	1,07,892
103	INKPK6	1286269	25-05-2023	65,32,272	20	13,06,454	13,06,454	2,61,291
104	INKPK6	1329565	27-05-2023	1,39,31,594	20	27,86,319	27,86,319	5,57,264
105	INKPK6	1392745	30-05-2023	81,31,351	20	16,26,270	16,26,270	3,25,254
106	INKPK6	1451334	01-06-2023	80,03,930	20	16,00,786	16,00,786	3,20,157
107	INKPK6	1530933	05-06-2023	66,32,524	20	13,26,505	13,26,505	2,65,301
108	INKPK6	1559022	06-06-2023	87,04,584	20	17,40,917	17,40,917	3,48,183
109	INKPK6	1605878	08-06-2023	81,46,307	20	16,29,262	16,29,262	3,25,852
110	INKPK6	1914143	21-06-2023	57,40,159	20	11,48,032	11,48,032	2,29,606
111	INKPK6	1971394	23-06-2023	41,00,113	20	8,20,023	8,20,023	1,64,005
112	INKPK6	2421260	13-07-2023	79,18,950	20	15,83,790	15,83,790	3,16,758
113	INKPK6	3443205	24-08-2023	2,04,18,480	20	40,83,696	40,83,696	8,16,739
114	INKPK6	4297158	20-09-2022	12,30,253	20	2,46,051	2,46,051	49,210
115	INKPK6	4676973	07-10-2022	32,78,156	20	6,55,631	6,55,631	1,31,126
116	INKPK6	4719943	10-10-2022	69,25,495	20	13,85,099	13,85,099	2,77,020
117	INKPK6	4783433	13-10-2022	70,12,305	20	14,02,461	14,02,461	2,80,492
118	INKPK6	4898485	18-10-2022	1,40,63,041	20	28,12,608	28,12,608	5,62,522
119	INKPK6	5087203	28-10-2022	27,58,403	20	5,51,681	5,51,681	1,10,336
120	INKPK6	5118444	29-10-2022	44,49,157	20	8,89,831	8,89,831	1,77,966
121	INKPK6	5151505	31-10-2022	28,59,574	20	5,71,915	5,71,915	1,14,383
122	INKPK	52033	02-11-	62,93,200	20	12,58,6	12,58,64	2,51,728

	6	06	2022			40	0	
123	INKPK6	5269214	05-11-2022	67,43,004	20	13,48,601	13,48,601	2,69,720
124	INKPK6	5315025	08-11-2022	1,00,86,182	20	20,17,236	20,17,236	4,03,447
125	INKPK6	5348043	09-11-2022	62,85,449	20	12,57,090	12,57,090	2,51,418
126	INKPK6	5379047	10-11-2022	1,01,14,507	20	20,22,901	20,22,901	4,04,580
127	INKPK6	5388472	11-11-2022	6,79,795	20	1,35,959	1,35,959	27,192
128	INKPK6	5393982	11-11-2022	50,69,051	20	10,13,810	10,13,810	2,02,762
129	INKPK6	5397757	11-11-2022	20,39,386	20	4,07,877	4,07,877	81,575
130	INKPK6	5419586	12-11-2022	67,43,004	20	13,48,601	13,48,601	2,69,720
131	INKPK6	5424421	12-11-2022	54,38,363	20	10,87,673	10,87,673	2,17,535
132	INKPK6	5478195	15-11-2022	68,43,389	20	13,68,678	13,68,678	2,73,736
133	INKPK6	5578079	19-11-2022	70,09,634	20	14,01,927	14,01,927	2,80,385
134	INKPK6	5599051	21-11-2022	66,98,593	20	13,39,719	13,39,719	2,67,944
135	INKPK6	5693357	24-11-2022	65,99,888	20	13,19,978	13,19,978	2,63,996
136	INKPK6	5796921	29-11-2022	67,95,392	20	13,59,078	13,59,078	2,71,816
137	INKPK6	5805035	29-11-2022	74,92,149	20	14,98,430	14,98,430	2,99,686
138	INKPK6	5821200	30-11-2022	74,92,149	20	14,98,430	14,98,430	2,99,686
139	INKPK6	5857306	01-12-2022	1,17,18,931	20	23,43,786	23,43,786	4,68,757
140	INKPK6	5857685	01-12-2022	62,04,140	20	12,40,828	12,40,828	2,48,166
141	INKPK6	5867030	01-12-2022	67,76,566	20	13,55,313	13,55,313	2,71,063
142	INKPK6	5905807	03-12-2022	67,26,307	20	13,45,262	13,45,262	2,69,052
143	INKPK6	5940544	05-12-2022	62,76,539	20	12,55,308	12,55,308	2,51,062
144	INKPK6	5956794	06-12-2022	74,27,911	20	14,85,582	14,85,582	2,97,116
145	INKPK6	5960497	06-12-2022	1,40,20,669	20	28,04,134	28,04,134	5,60,827
146	INKPK6	5961617	06-12-2022	70,45,956	20	14,09,191	14,09,191	2,81,838

147	INKPK 6	6039788	09-12-2022	67,49,531	20	13,49,906	13,49,906	2,69,981
148	INKPK 6	6089449	12-12-2022	66,63,206	20	13,32,641	13,32,641	2,66,528
149	INKPK 6	6153245	14-12-2022	66,51,386	20	13,30,277	13,30,277	2,66,055
150	INKPK 6	6154462	14-12-2022	14,85,587	20	2,97,117	2,97,117	59,423
151	INKPK 6	6196689	16-12-2022	67,75,634	20	13,55,127	13,55,127	2,71,025
152	INKPK 6	6213288	16-12-2022	67,75,634	20	13,55,127	13,55,127	2,71,025
153	INKPK 6	6236313	18-12-2022	1,42,82,574	20	28,56,515	28,56,515	5,71,303
154	INKPK 6	6291371	20-12-2022	53,39,088	20	10,67,818	10,67,818	2,13,564
155	INKPK 6	6294051	20-12-2022	1,42,82,574	20	28,56,515	28,56,515	5,71,303
156	INKPK 6	6319435	21-12-2022	14,72,688	20	2,94,538	2,94,538	58,908
157	INKPK 6	6320568	21-12-2022	14,69,030	20	2,93,806	2,93,806	58,761
158	INKPK 6	6348220	22-12-2022	34,78,714	20	6,95,743	6,95,743	1,39,149
159	INKPK 6	6348287	22-12-2022	15,90,356	20	3,18,071	3,18,071	63,614
160	INKPK 6	6422834	24-12-2022	1,42,82,574	20	28,56,515	28,56,515	5,71,303
161	INKPK 6	6470319	27-12-2022	77,41,388	20	15,48,278	15,48,278	3,09,656
162	INKPK 6	6564352	30-12-2022	21,12,388	20	4,22,478	4,22,478	84,496
163	INKPK 6	6595120	31-12-2022	1,42,82,574	20	28,56,515	28,56,515	5,71,303
164	INKPK 6	6631391	02-01-2023	70,67,838	20	14,13,568	14,13,568	2,82,714
165	INKPK 6	6643711	02-01-2023	1,51,91,794	20	30,38,359	30,38,359	6,07,672
166	INKPK 6	6669251	03-01-2023	34,17,427	20	6,83,485	6,83,485	1,36,697
167	INKPK 6	6687080	04-01-2023	72,80,887	20	14,56,178	14,56,178	2,91,236
168	INKPK 6	6747239	06-01-2023	1,73,32,425	20	34,66,485	34,66,485	6,93,297
169	INKPK 6	6817433	09-01-2023	1,39,39,695	20	27,87,939	27,87,939	5,57,588
170	INKPK 6	6861159	10-01-2023	69,69,848	20	13,93,970	13,93,970	2,78,794
171	INKPK	70062	16-01-	1,59,03,42	20	31,80,6	31,80,68	6,36,137

	6	32	2023	2		84	4	
172	INKPK 6	70472 70	18-01-2023	1,39,29,50 0	20	27,85,9 00	27,85,90 0	5,57,180
173	INKPK 6	71833 21	23-01-2023	68,50,778	20	13,70,1 56	13,70,15 6	2,74,031
174	INKPK 6	72269 27	24-01-2023	18,70,383	20	3,74,07 7	3,74,077	74,815
175	INKPK 6	73353 63	28-01-2023	67,17,676	20	13,43,5 35	13,43,53 5	2,68,707
176	INKPK 6	75320 47	04-02-2023	1,09,44,55 4	20	21,88,9 11	21,88,91 1	4,37,782
177	INKPK 6	76350 44	08-02-2023	69,41,066	20	13,88,2 13	13,88,21 3	2,77,643
178	INKPK 6	77204 29	11-02-2023	1,42,85,06 3	20	28,57,0 13	28,57,01 3	5,71,403
179	INKPK 6	80344 65	24-02-2023	1,44,34,87 5	20	28,86,9 75	28,86,97 5	5,77,395
180	INKPK 6	80574 36	25-02-2023	40,19,032	20	8,03,80 6	8,03,806	1,60,761
181	INKPK 6	80574 37	25-02-2023	1,33,36,82 3	20	26,67,3 65	26,67,36 5	5,33,473
182	INKPK 6	82211 90	03-03-2023	16,68,755	20	3,33,75 1	3,33,751	66,750
183	INKPK 6	82497 39	04-03-2023	71,92,103	20	14,38,4 21	14,38,42 1	2,87,684
184	INKPK 6	82886 61	06-03-2023	71,92,103	20	14,38,4 21	14,38,42 1	2,87,684
185	INKPK 6	83701 32	10-03-2023	74,49,469	20	14,89,8 94	14,89,89 4	2,97,979
186	INKPK 6	85231 31	16-03-2023	70,70,901	20	14,14,1 80	14,14,18 0	2,82,836
187	INKPK 6	85824 01	18-03-2023	74,67,694	20	14,93,5 39	14,93,53 9	2,98,708
188	INKPK 6	88688 71	28-03-2023	51,00,290	20	10,20,0 58	10,20,05 8	2,04,012
189	INKPK 6	90178 72	01-04-2023	84,69,716	20	16,93,9 43	16,93,94 3	3,38,789
190	INKPK 6	94069 35	19-04-2023	75,64,892	20	15,12,9 78	15,12,97 8	3,02,596
191	INKPK 6	96184 28	28-04-2023	39,26,338	20	7,85,26 8	7,85,268	1,57,054
192	INKPK 6	97117 61	02-05-2023	81,16,394	20	16,23,2 79	16,23,27 9	3,24,656
193	INKPK 6	97314 82	03-05-2023	78,98,860	20	15,79,7 72	15,79,77 2	3,15,954
194	INKRI1	23678 92	11-07-2023	2,32,34,18 1	20	46,46,8 36	46,46,83 6	9,29,367
195	INKRI1	23681 59	11-07-2023	2,32,34,18 1	20	46,46,8 36	46,46,83 6	9,29,367

196	INKRI1	2368692	11-07-2023	2,32,34,181	20	46,46,836	46,46,836	9,29,367
197	INKRI1	2369337	11-07-2023	39,51,861	20	7,90,372	7,90,372	1,58,074
198	INKRI1	2375510	11-07-2023	1,27,89,387	20	25,57,877	25,57,877	5,11,575
199	INMUN1	1221757	23-05-2023	49,15,793	20	9,83,159	9,83,159	1,96,632
200	INMUN1	1221760	23-05-2023	37,41,698	20	7,48,340	7,48,340	1,49,668
201	INMUN1	1232731	23-05-2023	1,70,64,338	20	34,12,868	34,12,868	6,82,574
202	INMUN1	1303624	26-05-2023	28,21,809	20	5,64,362	5,64,362	1,12,872
203	INMUN1	1343848	27-05-2023	1,12,87,232	20	22,57,446	22,57,446	4,51,489
204	INMUN1	1344016	27-05-2023	1,70,64,338	20	34,12,868	34,12,868	6,82,574
205	INMUN1	1559549	06-06-2023	1,70,95,725	20	34,19,145	34,19,145	6,83,829
206	INMUN1	1572799	06-06-2023	1,70,95,725	20	34,19,145	34,19,145	6,83,829
207	INMUN1	2075020	28-06-2023	47,82,697	20	9,56,539	9,56,539	1,91,308
208	INMUN1	2272104	06-07-2023	45,42,399	20	9,08,480	9,08,480	1,81,696
209	INMUN1	5924456	09-12-2023	1,87,38,272	20	37,47,654	37,47,654	7,49,531
210	INMUN1	5924493	09-12-2023	1,87,38,272	20	37,47,654	37,47,654	7,49,531
211	INMUN1	6051018	09-12-2022	7,10,660	20	1,42,132	1,42,132	28,426
212	INMUN1	6345726	22-12-2022	35,57,802	20	7,11,560	7,11,560	1,42,312
213	INMUN1	6538051	29-12-2022	8,66,671	20	1,73,334	1,73,334	34,667
214	INMUN1	6548855	05-01-2024	58,88,953	20	11,77,791	11,77,791	2,35,558
215	INMUN1	6548864	05-01-2024	47,10,350	20	9,42,070	9,42,070	1,88,414
216	INMUN1	6548867	05-01-2024	58,88,953	20	11,77,791	11,77,791	2,35,558
217	INMUN1	6549796	05-01-2024	58,88,953	20	11,77,791	11,77,791	2,35,558
218	INMUN1	6590859	31-12-2022	1,65,64,500	20	33,12,900	33,12,900	6,62,580
219	INMUN1	6635072	02-01-2023	54,14,398	20	10,82,880	10,82,880	2,16,576
220	INMU	66696	03-01-	55,26,037	20	11,05,2	11,05,20	2,21,041

	N1	69	2023			07	7	
221	INMU N1	67016 56	12-01-2024	45,11,485	20	9,02,29 7	9,02,297	1,80,459
222	INMU N1	68931 40	11-01-2023	37,54,691	20	7,50,93 8	7,50,938	1,50,188
223	INMU N1	70097 35	16-01-2023	1,39,39,69 5	20	27,87,9 39	27,87,93 9	5,57,588
224	INMU N1	70527 84	27-01-2024	53,78,202	20	10,75,6 40	10,75,64 0	2,15,128
225	INMU N1	71201 97	20-01-2023	1,37,01,55 5	20	27,40,3 11	27,40,31 1	5,48,062
226	INMU N1	75882 24	06-02-2023	92,51,979	20	18,50,3 96	18,50,39 6	3,70,079
227	INMU N1	76133 46	07-02-2023	18,84,946	20	3,76,98 9	3,76,989	75,398
228	INMU N1	77874 08	14-02-2023	1,10,29,28 4	20	22,05,8 57	22,05,85 7	4,41,171
229	INMU N1	77874 10	14-02-2023	1,03,39,95 4	20	20,67,9 91	20,67,99 1	4,13,598
230	INMU N1	77874 12	14-02-2023	1,30,97,27 5	20	26,19,4 55	26,19,45 5	5,23,891
231	INMU N1	79518 94	21-02-2023	75,37,639	20	15,07,5 28	15,07,52 8	3,01,506
232	INMU N1	80720 41	25-02-2023	1,39,31,19 0	20	27,86,2 38	27,86,23 8	5,57,248
233	INMU N1	84310 33	13-03-2023	1,93,13,43 8	20	38,62,6 88	38,62,68 8	7,72,538
234	INMU N1	84942 74	15-03-2023	56,52,623	20	11,30,5 25	11,30,52 5	2,26,105
235	INMU N1	85118 72	16-03-2023	1,04,29,25 6	20	20,85,8 51	20,85,85 1	4,17,170
236	INMU N1	86304 45	21-03-2023	19,33,905	20	3,86,78 1	3,86,781	77,356
237	INMU N1	87027 75	23-03-2023	1,39,39,69 5	20	27,87,9 39	27,87,93 9	5,57,588
238	INMU N1	89066 91	29-03-2023	20,90,954	20	4,18,19 1	4,18,191	83,638
239	INMU N1	89066 97	29-03-2023	34,84,924	20	6,96,98 5	6,96,985	1,39,397
240	INMU N1	89067 02	29-03-2023	48,78,893	20	9,75,77 9	9,75,779	1,95,156
241	INMU N1	90659 56	04-04-2023	77,94,485	20	15,58,8 97	15,58,89 7	3,11,779
242	INMU N1	92663 50	13-04-2023	38,49,820	20	7,69,96 4	7,69,964	1,53,993
243	INMU N1	92920 28	14-04-2023	18,30,024	20	3,66,00 5	3,66,005	73,201
244	INMU N1	95399 10	25-04-2023	46,70,028	20	9,34,00 6	9,34,006	1,86,801

245	INMUN1	9712017	02-05-2023	96,03,955	20	19,20,791	19,20,791	3,84,158
246	INNSA1	5517012	17-11-2022	19,63,853	20	3,92,771	3,92,771	78,554
247	INVTZ1	3322950	19-08-2023	95,62,326	20	19,12,465	19,12,465	3,82,493
248	INVTZ1	3624108	01-09-2023	60,03,040	20	12,00,608	12,00,608	2,40,122
249	INVTZ1	3624336	01-09-2023	40,02,026	20	8,00,405	8,00,405	1,60,081
250	INVTZ1	3747765	06-09-2023	1,27,93,348	20	25,58,670	25,58,670	5,11,734
251	INVTZ1	3759403	06-09-2023	61,85,355	20	12,37,071	12,37,071	2,47,414
252	INVTZ1	3759405	06-09-2023	1,03,18,817	20	20,63,763	20,63,763	4,12,753
253	INVTZ1	3759406	06-09-2023	1,98,68,967	20	39,73,793	39,73,793	7,94,759
254	INVTZ1	3759622	06-09-2023	93,01,341	20	18,60,268	18,60,268	3,72,054
255	INVTZ1	3792647	08-09-2023	1,08,91,500	20	21,78,300	21,78,300	4,35,660
256	INVTZ1	3908505	13-09-2023	1,28,52,573	20	25,70,515	25,70,515	5,14,103
257	INVTZ1	3909175	13-09-2023	2,71,38,351	20	54,27,670	54,27,670	10,85,534
258	INVTZ1	3948083	15-09-2023	93,90,003	20	18,78,001	18,78,001	3,75,600
259	INVTZ1	3948375	15-09-2023	46,95,002	20	9,39,000	9,39,000	1,87,800
260	INVTZ1	3965219	15-09-2023	2,01,54,684	20	40,30,937	40,30,937	8,06,187
261	INVTZ1	3965552	15-09-2023	1,81,39,215	20	36,27,843	36,27,843	7,25,569
262	INVTZ1	4026267	19-09-2023	94,58,699	20	18,91,740	18,91,740	3,78,348
263	INVTZ1	4026341	19-09-2023	94,58,699	20	18,91,740	18,91,740	3,78,348
264	INVTZ1	4026463	19-09-2023	94,58,699	20	18,91,740	18,91,740	3,78,348
265	INVTZ1	4050885	20-09-2023	60,77,061	20	12,15,412	12,15,412	2,43,082
266	INVTZ1	4060343	21-09-2023	1,01,58,534	20	20,31,707	20,31,707	4,06,341
267	INVTZ1	4072924	21-09-2023	1,00,93,752	20	20,18,750	20,18,750	4,03,750
268	INVTZ1	4074492	21-09-2023	50,10,614	20	10,02,123	10,02,123	2,00,425
269	INVTZ	40745	21-09-	1,00,21,22	20	20,04,2	20,04,24	4,00,849

	1	16	2023	7		45	5	
270	INVTZ 1	4074522	21-09-2023	1,00,21,227	20	20,04,245	20,04,245	4,00,849
271	INVTZ 1	4074574	21-09-2023	50,10,614	20	10,02,123	10,02,123	2,00,425
272	INVTZ 1	4074653	21-09-2023	1,00,21,227	20	20,04,245	20,04,245	4,00,849
273	INVTZ 1	4075186	21-09-2023	2,17,83,000	20	43,56,600	43,56,600	8,71,320
274	INVTZ 1	4152553	25-09-2023	81,12,605	20	16,22,521	16,22,521	3,24,504
275	INVTZ 1	4159100	25-09-2023	95,13,333	20	19,02,667	19,02,667	3,80,533
276	INVTZ 1	4162666	25-09-2023	2,00,14,802	20	40,02,960	40,02,960	8,00,592
277	INVTZ 1	4197924	26-09-2023	96,18,528	20	19,23,706	19,23,706	3,84,741
278	INVTZ 1	4198173	26-09-2023	1,00,32,370	20	20,06,474	20,06,474	4,01,295
279	INVTZ 1	4203485	26-09-2023	2,18,09,500	20	43,61,900	43,61,900	8,72,380
280	INVTZ 1	4229668	27-09-2023	60,84,454	20	12,16,891	12,16,891	2,43,378
281	INVTZ 1	4592097	12-10-2023	1,01,28,169	20	20,25,634	20,25,634	4,05,127
282	INVTZ 1	4865037	25-10-2023	59,32,710	20	11,86,542	11,86,542	2,37,308
283	INVTZ 1	4865130	25-10-2023	39,55,140	20	7,91,028	7,91,028	1,58,206
284	INVTZ 1	4995683	30-10-2023	45,38,304	20	9,07,661	9,07,661	1,81,532
285	INVTZ 1	4996181	30-10-2023	45,38,304	20	9,07,661	9,07,661	1,81,532
286	INVTZ 1	5083876	02-11-2023	1,39,15,769	20	27,83,154	27,83,154	5,56,631
287	INVTZ 1	5087367	02-11-2023	79,24,536	20	15,84,907	15,84,907	3,16,981
288	INVTZ 1	5087602	02-11-2023	59,43,402	20	11,88,680	11,88,680	2,37,736
289	INVTZ 1	5087835	02-11-2023	59,43,402	20	11,88,680	11,88,680	2,37,736
290	INVTZ 1	5095107	02-11-2023	90,48,310	20	18,09,662	18,09,662	3,61,932
291	INVTZ 1	5241701	08-11-2023	18,34,876	20	3,66,975	3,66,975	73,395
292	INVTZ 1	5241715	08-11-2023	90,98,818	20	18,19,764	18,19,764	3,63,953
293	INVTZ 1	5254011	09-11-2023	1,85,11,504	20	37,02,301	37,02,301	7,40,460

294	INVTZ 1	5419917	18-11-2023	92,73,960	20	18,54,792	18,54,792	3,70,958
295	INVTZ 1	5420107	18-11-2023	92,69,892	20	18,53,978	18,53,978	3,70,796
296	INVTZ 1	5548719	24-11-2023	1,76,61,155	20	35,32,231	35,32,231	7,06,446
297	INVTZ 1	5548724	24-11-2023	1,76,61,155	20	35,32,231	35,32,231	7,06,446
298	INVTZ 1	5574770	25-11-2023	1,80,97,535	20	36,19,507	36,19,507	7,23,901
299	INVTZ 1	5651120	29-11-2023	1,33,54,853	20	26,70,971	26,70,971	5,34,194
300	INVTZ 1	5697188	30-11-2023	1,74,79,184	20	34,95,837	34,95,837	6,99,167
301	INVTZ 1	5697203	30-11-2023	1,74,79,184	20	34,95,837	34,95,837	6,99,167
302	INVTZ 1	5789505	04-12-2023	89,76,110	20	17,95,222	17,95,222	3,59,044
303	INVTZ 1	5789705	04-12-2023	1,74,79,184	20	34,95,837	34,95,837	6,99,167
304	INVTZ 1	5790024	04-12-2023	87,94,140	20	17,58,828	17,58,828	3,51,766
305	INVTZ 1	5790327	04-12-2023	1,33,54,853	20	26,70,971	26,70,971	5,34,194
306	INVTZ 1	5867185	07-12-2023	1,74,79,184	20	34,95,837	34,95,837	6,99,167
307	INVTZ 1	5867890	07-12-2023	53,52,938	20	10,70,588	10,70,588	2,14,118
308	INVTZ 1	5974063	12-12-2023	1,35,57,068	20	27,11,414	27,11,414	5,42,283
309	INVTZ 1	5974308	12-12-2023	1,35,57,068	20	27,11,414	27,11,414	5,42,283
310	INVTZ 1	6069061	15-12-2023	17,94,345	20	3,58,869	3,58,869	71,774
311	INVTZ 1	6076382	15-12-2023	56,06,885	20	11,21,377	11,21,377	2,24,275
312	INVTZ 1	6076432	15-12-2023	52,74,123	20	10,54,825	10,54,825	2,10,965
313	INVTZ 1	6076467	15-12-2023	87,80,303	20	17,56,061	17,56,061	3,51,212
314	INVTZ 1	6100557	16-12-2023	1,78,13,408	20	35,62,682	35,62,682	7,12,536
315	INVTZ 1	6100657	16-12-2023	89,06,704	20	17,81,341	17,81,341	3,56,268
316	INVTZ 1	6100807	16-12-2023	90,52,590	20	18,10,518	18,10,518	3,62,104
317	INVTZ 1	6100955	16-12-2023	90,52,590	20	18,10,518	18,10,518	3,62,104
318	INVTZ	62405	22-12-	90,50,633	20	18,10,1	18,10,12	3,62,025

	1	27	2023			27	7	
319	INVTZ 1	6242202	22-12-2023	90,50,633	20	18,10,127	18,10,127	3,62,025
320	INVTZ 1	6243263	22-12-2023	44,70,538	20	8,94,108	8,94,108	1,78,822
321	INVTZ 1	6329451	27-12-2023	90,85,716	20	18,17,143	18,17,143	3,63,429
322	INVTZ 1	6345235	27-12-2023	96,12,262	20	19,22,452	19,22,452	3,84,490
323	INVTZ 1	6345537	27-12-2023	1,78,57,380	20	35,71,476	35,71,476	7,14,295
324	INVTZ 1	6346053	27-12-2023	96,10,219	20	19,22,044	19,22,044	3,84,409
325	INVTZ 1	6387650	29-12-2023	1,82,84,011	20	36,56,802	36,56,802	7,31,360
326	INVTZ 1	6706684	12-01-2024	92,49,326	20	18,49,865	18,49,865	3,69,973
327	INVTZ 1	6719803	12-01-2024	94,25,646	20	18,85,129	18,85,129	3,77,026
328	INVTZ 1	6720836	12-01-2024	94,25,646	20	18,85,129	18,85,129	3,77,026
329	INVTZ 1	6747406	13-01-2024	92,49,326	20	18,49,865	18,49,865	3,69,973
330	INVTZ 1	6747456	13-01-2024	92,49,326	20	18,49,865	18,49,865	3,69,973
331	INVTZ 1	6823187	17-01-2024	95,10,188	20	19,02,038	19,02,038	3,80,408
332	INVTZ 1	6849934	18-01-2024	46,57,453	20	9,31,491	9,31,491	1,86,298
333	INVTZ 1	6850114	18-01-2024	46,57,453	20	9,31,491	9,31,491	1,86,298
334	INVTZ 1	6850299	18-01-2024	46,51,338	20	9,30,268	9,30,268	1,86,054
335	INVTZ 1	6850467	18-01-2024	46,51,338	20	9,30,268	9,30,268	1,86,054
336	INVTZ 1	6982639	24-01-2024	2,69,28,331	20	53,85,666	53,85,666	10,77,133
337	INVTZ 1	7200156	01-02-2024	92,73,071	20	18,54,614	18,54,614	3,70,923
338	INVTZ 1	7200258	01-02-2024	92,73,071	20	18,54,614	18,54,614	3,70,923
339	INVTZ 1	7269098	05-02-2024	92,70,140	20	18,54,028	18,54,028	3,70,806
				3,87,84,48,383		**77,56,89,699**	**77,56,89,699**	**15,51,37,940**

8.2.1 In respect of these shipments, the exporter appears to have not declared the true facts before the customs authorities at the port of export at the time of effecting the exports. Their export documents (invoices raised to the overseas buyers) reflect that they have claimed and recovered from the overseas buyers the duty paid by them at the time of export, but the said duty amounts so recovered were not included in their transaction values declared before the Customs authorities. These duty-paid amounts appear to have been claimed and recovered by them from the buyer by raising separate invoices, having prices (inclusive of export duty), to the buyer.

Their financial transactions show that the exporter had recovered these amounts in their bank accounts, which were over and above their declared transaction values (declared in the export documents) in respect of their export shipments. These facts have been confirmed by the exporter in his statement recorded under Section 108 of the Customs Act, 1962, as well as in the details of their export shipments/separate commercial invoices submitted by them during investigation under the provisions of Section 108 of the Customs Act, 1962.

8.3 **For ease of reference,** as may be seen from the copy of **Shipping Bill No. 5871631 dated 07.12.2023 (RUD-11)** pasted below, the exporter had declared an invoice value of **Rs. 9,86,934.51** in respect of the said shipment, which was received by them from the buyer. In respect of the said shipment, as discussed in the above paragraph, the exporter had separately claimed and recovered an amount of **Rs. 1,97,387/-,** which is equal to the export duty amount of **Rs. 1,97,387/-,** from the overseas buyer by submitting a separate invoice to the buyer that had **a total value of Rs. 11,84,321.25/-.** which is reflected in their Bank Realization Certificate also. The aforesaid amount of **Rs. 1,97,387/-** received by them from the overseas buyer is over and above their declared invoice value of **Rs. 9,86,934.51.**

Therefore, the exporter appears to have suppressed the said amount of **Rs. 1,97,387/-,** received by them separately from the buyer as reimbursement of duty payment. Their export declarations reflect that they have neither declared the full amount to be received by them from the overseas buyer in their export invoice nor in the shipping bill. Thus, they appear to have mis-declared the actual FOB Value in respect of all such shipping bills.

Photo of the Shipping Bill Number 5871631 dated 07.12.2023

INDIAN CUSTOMS EDI SYSTEM
CENTRAL BOARD OF INDIRECT TAXES AND CUSTOMS
DEPARTMENT OF REVENUE - MINISTRY OF FINANCE
GOVERNMENT OF INDIA
15/1 STRAND ROAD, CUSTOM HOUSE, KOLKATA - 700001

Port Code	SB No	SB Date	
INCCU1	5871631	07-DEC-23	
IEC/Br	ABECS8262N	0	
GSTIN/TYPE	27ABECS8262N1ZN GSN		
CB CODE	AHRPT5523DCH002		
TYPE	INV	ITEM	CONT
Nos	1	1	1
PKG	540	G.WT KGS	27054

* SB22161220231600

PART - I - SHIPPING BILL SUMMARY

A STATUS

1.MODE	2.ASSESS	3.EXMN	4.JOBBING	5.MEIS	6.DBK	7.RODTP	8.LICENCE	9.DFRC	10.RE-EXP	11.LUT
SEA	N	Y	N	Y	Y	N	N	N		Y

12.PORT OF LOADING	INCCU1 (Calcutta)	13.COUNTRY OF FINALDESTINATIO	LITHUANIA
14.STATE OF ORIGIN	West Bengal	15.PORT OF FINAL DESTINATION	LTKLJ (Klaipeda)
16.PORT OF DISCHARGE	LTKLJ (Klaipeda)	17.COUNTRY OF DISCHARGE	BELARUS

B DECLARAN DETAILS

1.EXPORTER'S NAME & ADDRESS		7.CONSIGNEE NAME & ADDRESS	
PAGARIYA EXPORTS PRIVATE LIMITED		TO ORDER	
PLOT NO 19 , HOUSE 1256/U1		.	
GREAT NAG ROAD, RAMBAGH			
NAGPUR	2.Type Private	BY	
3. AD CODE:	0230187	8. GSTIN / TYPE	27ABECS8262N1ZN GSN
4.RBI WAIVER NO.& DT		9.FOREX BANK A/C NO.	60XXXXXX482
5.CB NAME	RUDRA CARGO SERVICES	10.DBK BANK A/C NO.	60XXXXXX482
6.AEO		11. IFSC NO.	MAHB0000005

C.VALU SUMMA

1.FOB VALUE	2.FREIGHT	3.INSURANC	4.DISCOU	5.COM
986934.51	0	0	0	26681
6.DEDUCTIONS	7.P/C		8.DUTY	9.CESS
0	0			197387

D. EX.PR.

1.DBK CLAIM	2. IGST AMT	3.CESS AMT
0		197387
4.IGST VALUE	5.RODTEP AMT	6.ROSCTL AMT
	0	0

E MANIFEST DETAILS

1.MAWB NO.	2.MAWB DT	3.HAWB NO.	4.HAWB DT	N.O.C.

4. CIN NO.	5. CIN DT.	6. CIN SITE ID
23PCEG1208437017300	08-DEC-23	INCCU1

F.INVOICE SUMMARY

1.SNO	2.INV NO.	3. INV AMT.	4.CURRENC
1	SR23Y-00371	986934.51	INR

1.CONTAINER	2.SEAL	3.DATE	4.S No
EMCU6207646			1

1SR.NO	2.CHALLAN NO	3.PAYMT DT	4.AMOUNT
1	155960	15-DEC-23	197387

PART - II - INVOICE DETAILS

A. REF

1.S.No	2.INVOICE No. & Dt.	3.P.O.No. & Dt.	4.LoC No. & Dt	5.Contract No.&Dt	6.AD code	7.INVTERM
1	SR23Y-00371 21/11/2023				0230187	FOB

B. TRANSACTION PARTIES

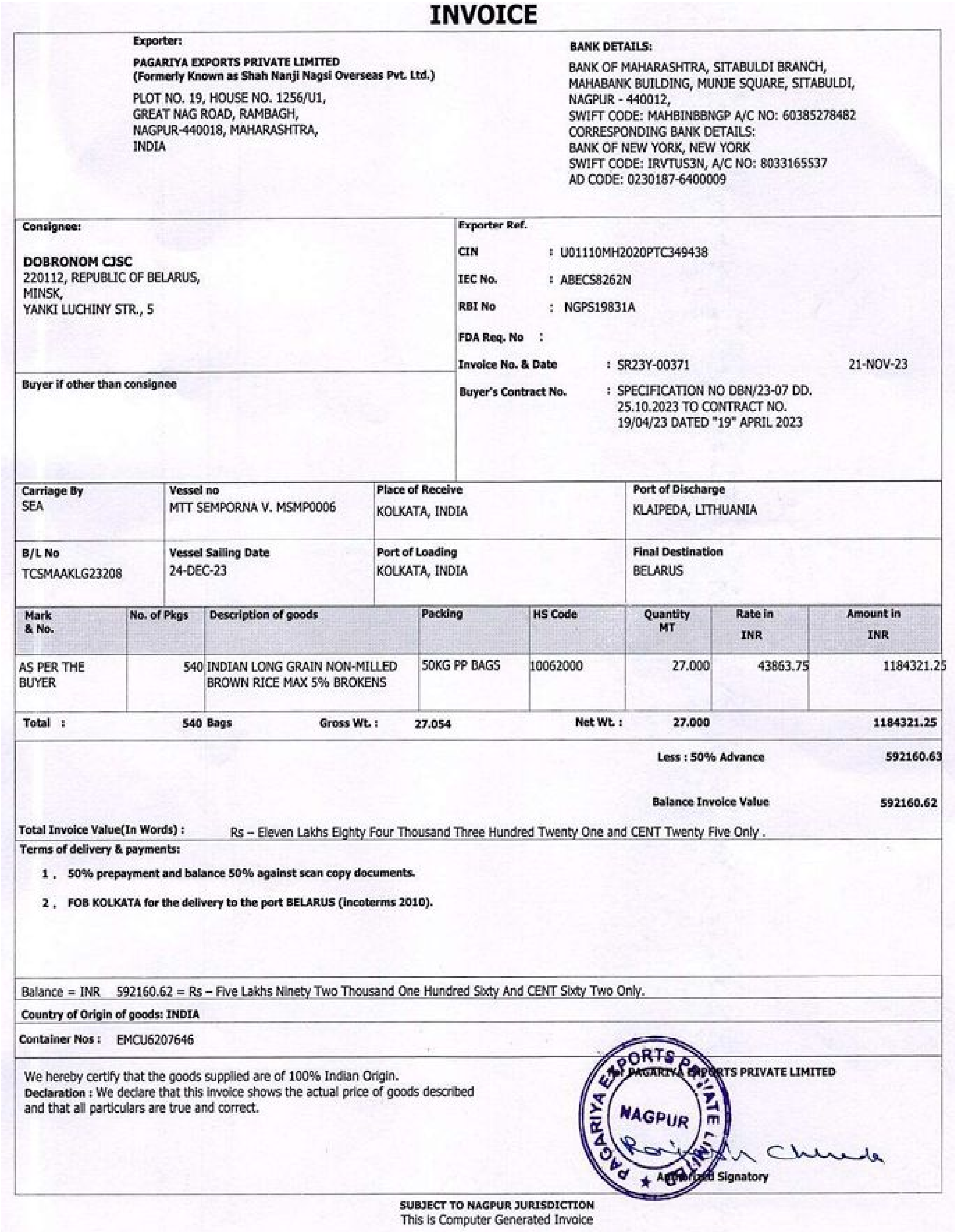
1.EXPORTER'S NAME & ADDRESS	2.BUYER'S NAME & ADDRESS
PAGARIYA EXPORTS PRIVATE LIMITED	DOBRONOM CJSC
PLOT NO 19 , HOUSE 1256/U1	.
GREAT NAG ROAD, RAMBAGH	
440018	
3.THIRD PARTY NAME & ADDRESS	**4.BUYER AEO STATUS**

C.VAL DTLS

1.INVOICE VALUE	2.FOB VALUE	3FREIGHT	4.INSURANCE	5DISCOUNT	6.COMMISON	7.DEDUCT	8.P/C	9.EXCHANGE RATE
986934.51	986934.51	0	0	0	26681.4	0		1 INR INR 1
INR	INR	INR	INR		INR			

1.ItemSNo	2.HS CD	3.DESCRIPTION	4.QUANTITY	5.UQC	6.RATE	7.VALUE(F/C)
1	10062000	BROWN RICE (NON BASMATI PACKING 50KG PP BAGS) GDS PROCURE FRM PVT HLD STK	27	MTS	36553.1	986934.51

Photo of the Invoice No. SR23Y-00371 dated 21-11-2023 submitted to the buyer having total value of Rs.11,84,321.25/- which included the duty paid amounts:



INVOICE

Exporter:
PAGARIYA EXPORTS PRIVATE LIMITED
(Formerly Known as Shah Nanji Nagsi Overseas Pvt. Ltd.)
PLOT NO. 19, HOUSE NO. 1256/U1,
GREAT NAG ROAD, RAMBAGH,
NAGPUR-440018, MAHARASHTRA,
INDIA

BANK DETAILS:
BANK OF MAHARASHTRA, SITABULDI BRANCH,
MAHABANK BUILDING, MUNJE SQUARE, SITABULDI,
NAGPUR - 440012,
SWIFT CODE: MAHBINBBNGP A/C NO: 60385278482
CORRESPONDING BANK DETAILS:
BANK OF NEW YORK, NEW YORK
SWIFT CODE: IRVTUS3N, A/C NO: 8033165537
AD CODE: 0230187-6400009

Consignee:
DOBRONOM CJSC
220112, REPUBLIC OF BELARUS,
MINSK,
YANKI LUCHINY STR., 5

Buyer if other than consignee

Exporter Ref.
CIN : U01110MH2020PTC349438
IEC No. : ABECS8262N
RBI No : NGPS19831A
FDA Req. No :
Invoice No. & Date : SR23Y-00371 21-NOV-23
Buyer's Contract No. : SPECIFICATION NO DBN/23-07 DD. 25.10.2023 TO CONTRACT NO. 19/04/23 DATED "19" APRIL 2023

Carriage By	Vessel no	Place of Receive	Port of Discharge
SEA	MTT SEMPORNA V. MSMP0006	KOLKATA, INDIA	KLAIPEDA, LITHUANIA
B/L No	**Vessel Sailing Date**	**Port of Loading**	**Final Destination**
TCSMAAKLG23208	24-DEC-23	KOLKATA, INDIA	BELARUS

Mark & No.	No. of Pkgs	Description of goods	Packing	HS Code	Quantity MT	Rate in INR	Amount in INR
AS PER THE BUYER	540	INDIAN LONG GRAIN NON-MILLED BROWN RICE MAX 5% BROKENS	50KG PP BAGS	10062000	27.000	43863.75	1184321.25
Total :	**540 Bags**	**Gross Wt. :**	**27.054**	**Net Wt. :**	**27.000**		**1184321.25**
					Less : 50% Advance		**592160.63**
					Balance Invoice Value		**592160.62**

Total Invoice Value(In Words) : Rs – Eleven Lakhs Eighty Four Thousand Three Hundred Twenty One and CENT Twenty Five Only .

Terms of delivery & payments:

1 . **50% prepayment and balance 50% against scan copy documents.**

2 . **FOB KOLKATA for the delivery to the port BELARUS (incoterms 2010).**

Balance = INR 592160.62 = Rs – Five Lakhs Ninety Two Thousand One Hundred Sixty And CENT Sixty Two Only.

Country of Origin of goods: INDIA

Container Nos : EMCU6207646

We hereby certify that the goods supplied are of 100% Indian Origin.
Declaration : We declare that this invoice shows the actual price of goods described and that all particulars are true and correct.

For PAGARIYA EXPORTS PRIVATE LIMITED
PAGARIYA EXPORTS PRIVATE LIMITED NAGPUR
Authorised Signatory

SUBJECT TO NAGPUR JURISDICTION
This is Computer Generated Invoice

Photo of the same Invoice bearing No. SR23Y-00371 dated 21-11-2023 submitted to the Customs, having total value of Rs.9,86,934.51 which is lower than the value declared in the invoice submitted to the overseas buyer

CUSTOM INVOICE

Exporter:
PAGARIYA EXPORTS PRIVATE LIMITED
(Formerly Known as Shah Nanji Nagsi Overseas Pvt. Ltd.)
PLOT NO. 19, HOUSE NO. 1256/U1,
GREAT NAG ROAD, RAMBAGH,
NAGPUR-440018, MAHARASHTRA,
INDIA

BANK DETAILS:
BANK OF MAHARASHTRA, SITABULDI BRANCH,
MAHABANK BUILDING, MUNJE SQUARE, SITABULDI,
NAGPUR - 440012,
SWIFT CODE: MAHBINBBNGP A/C NO: 60385278482
CORRESPONDING BANK DETAILS:
BANK OF NEW YORK, NEW YORK
SWIFT CODE: IRVTUS3N, A/C NO: 8033165537
AD CODE: 0230187-6400009

Consignee:
TO ORDER

Buyer if other than consignee
DOBRONOM CJSC

Exporter Ref.

CIN	: U01110MH2020PTC349438	
IEC No.	: ABECS8262N	
RBI No	: NGPS19831A	
FDA Req. No	:	
Invoice No. & Date	: SR23Y-00371	21-NOV-23
Buyer's Contract No.	: SPECIFICATION NO DBN/23-07 DD. 25.10.2023 TO CONTRACT NO. 19/04/23 DATED "19" APRIL 2023	25-JUL-23
Contract No.	: SE23Y-00202	30-OCT-23
L .C . No. & Dt of Issue	:	

Carriage By	**Vessel no**	**Place of Receive**	**Port of Discharge**
SEA		KOLKATA	KLAIPEDA, LITHUANIA
B/L No	**Vessel Sailing Date**	**Port of Loading**	**Final Destination**
		KOLKATA, INDIA	BELARUS

Mark & No.	No. of Pkgs	Description of goods	Packing	HS Code	Quantity MT	Rate in INR	Amount in INR
AS PER THE BUYER	540	INDIAN LONG GRAIN NON-MILLED BROWN RICE	50KG PP BAGS		27.000	36553.13	986934.51
Total :	**540 Bags**	**Gross Wt. :** **27.054**		**Net Wt. :**	**27.000**		**986934.51**

Balance Invoice Value **986934.51**

Total Invoice Value(In Words) : Rs - Nine Lakhs Eighty Six Thousand Nine Hundred Thirty Four And Paise Fifty One Only .

Terms of delivery & payments:

1 . **50% prepayment before shipment, 50% against scan copy documents.**

2 . **FOB KOLKATA for the delivery to the port BELARUS (incoterms 2010).// COMMISSION USD 12 PMT. // EXCLUDING EXPORTS CESS.**
//CARGO INTRANSIT TO BELARUS.

3 . **Export under claim drawback Drawback Serial No: 100604B**

4 . **"Supply meant for export without payment of Integrated tax under Letter of Undertaking.(ARN NO.AD2703230374853)"**

Balance = INR 986934.51 = Rs - Nine Lakhs Eighty Six Thousand Nine Hundred Thirty Four And Paise Fifty One Only .

Country of Origin of goods: INDIA

Container Nos :

We hereby certify that the goods supplied are of 100% Indian Origin.
Declaration : We declare that this invoice shows the actual price of goods described and that all particulars are true and correct.

For PAGARIYA EXPORTS PRIVATE LIMITED

PAGARIYA EXPORTS PRIVATE LIMITED NAGPUR

Authorized Signatory

SUBJECT TO NAGPUR JURISDICTION
This is Computer Generated Invoice

Photo of the BRC indicating receipt of declared invoice amount of Rs.11,84,321.25/-

DIRECTORATE GENERAL OF FOREIGN TRADE

STATEMENT OF BANK REALISATION

<table>
<tr><td>1</td><td>Firm Name</td><td colspan="5">PAGARIYA EXPORTS PRIVATE LIMITED</td></tr>
<tr><td>2</td><td>Address/GSTIN</td><td colspan="5">PLOT NO 19 , HOUSE 1256/U1GREAT NAG ROAD, RAMBAGH,NAGPUR-440018</td></tr>
<tr><td>3</td><td>IEC</td><td colspan="5">ABECS8262N</td></tr>
<tr><td>4</td><td>Shipping Bill / Invoice No.</td><td colspan="5">5871631</td></tr>
<tr><td>5</td><td>Shipping Bill / Invoice Date</td><td colspan="5">07-12-2023</td></tr>
<tr><td>6</td><td>Shipping Bill Port</td><td colspan="5">INCCU1</td></tr>
<tr><td>7</td><td>Bank Name</td><td colspan="5">BANK OF MAHARASHTRA</td></tr>
<tr><td>8</td><td>Bill ID No.</td><td colspan="5">0000524GC5007671</td></tr>
<tr><td>9</td><td>Bank Realisation Certificate No.</td><td colspan="5">MAHB0000005255001110 Dated 20-09-2025</td></tr>
<tr><td>10</td><td>Date of Realisation of Money by Bank</td><td colspan="5">24-12-2023</td></tr>
<tr><td>11</td><td>Total Realised Value</td><td colspan="5">11,84,321.25</td></tr>
<tr><td rowspan="2">12</td><td rowspan="2">Commission,Discount, Insurance, Freight and Other Deductions</td><td>Commission</td><td>Discount</td><td>Insurance</td><td>Freight</td><td>Other</td></tr>
<tr><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr>
<tr><td>13</td><td>Net Realised Value</td><td colspan="5">11,84,321.25</td></tr>
<tr><td>14</td><td>Currency of Realization</td><td colspan="5">INR</td></tr>
<tr><td>15</td><td>Date and Time of Printing</td><td colspan="5">03-11-2025 02:09:18 PM</td></tr>
<tr><td>16</td><td>QR Code
Scan to Validate Online on DGFT
Website:
https://www.dgft.gov.in</td><td></td><td>17</td><td colspan="2">Source (Bank / Exporter)</td><td>Bank</td></tr>
</table>

8.4 Excess Ocean freight amounts wrongly declared in the Shipping Bills:

8.4.1 In respect of the **following 72 shipments of rice,** it appears that the exporter declared higher amounts of ocean freight in comparison to the actual freight amounts paid by them, thus causing short payment of duty on the differential ocean freight amount in respect of these 72 shipments.

8.4.2 In respect of these 72 SBs, the total declared freight amount is **Rs.17,26,06,280/-.** However, scrutiny of documents and freight invoices submitted by the exporter revealed that the actual freight amount paid by them in respect of these 72 Shipping Bills is **Rs.16,25,88,802/-.** Therefore, as shown in the table below, it is evident that, in respect of these 72 shipping bills, the exporter has declared excess freight amounts of **Rs.1,00,17,478 /-.**

Table-B

S. No.	Custom House Code	SB Number	SB Date	Declared Freight	Actual freight	Excess Freight	Duty payable on Excess Freight
				(in Rs.)	(in Rs.)	(in Rs.)	(in Rs.)
1	INIXY1	4610353	03-10-2022	66,50,150	62,34,708	4,15,442	83,088
2	INIXY1	4610391	03-10-2022	66,50,150	62,34,708	4,15,442	83,088
3	INIXY1	4610393	03-10-2022	66,50,150	62,35,423	4,14,727	82,945
4	INIXY1	4610426	03-10-2022	66,50,150	62,35,423	4,14,727	82,945
5	INIXY1	4610604	03-10-2022	33,25,075	31,17,712	2,07,363	41,473
6	**INIXY1**	**4610612**	**03-10-2022**	**66,50,150**	**62,35,423**	**4,14,727**	**82,945**
7	INIXY1	5862898	01-12-2022	48,54,000	47,05,338	1,48,662	29,732
8	INIXY1	5862899	01-12-2022	48,54,000	47,05,338	1,48,662	29,732
9	INIXY1	5862900	01-12-2022	48,54,000	47,05,338	1,48,662	29,732
10	INIXY1	5862903	01-12-2022	48,54,000	47,05,338	1,48,662	29,732
11	INIXY1	5864512	01-12-2022	48,54,000	47,05,338	1,48,662	29,732
12	INIXY1	5876468	02-12-2022	24,09,000	23,35,220	73,780	14,756
13	INIXY1	5876496	02-12-2022	24,09,000	23,35,220	73,780	14,756
14	INIXY1	5876501	02-12-2022	24,09,000	23,35,220	73,780	14,756
15	INIXY1	5876526	02-12-2022	24,09,000	23,35,220	73,780	14,756
16	INIXY1	5878635	02-12-2022	24,09,000	23,35,220	73,780	14,756
17	INIXY1	5878640	02-12-2022	24,09,000	23,35,220	73,780	14,756
18	INIXY1	5878641	02-12-2022	24,09,000	23,35,220	73,780	14,756
19	INIXY1	5878667	02-12-2022	24,09,000	23,35,220	73,780	14,756
20	INIXY1	5879952	02-12-2022	48,18,000	46,70,441	1,47,559	29,512
21	INIXY1	588447	02-12-	24,09,000	23,35,220	73,780	14,756

		5	2022				
22	INIXY1	5885297	02-12-2022	24,09,000	23,35,220	73,780	14,756
23	INIXY1	5888626	02-12-2022	24,09,000	23,35,220	73,780	14,756
24	INIXY1	5893281	02-12-2022	24,09,000	23,35,220	73,780	14,756
25	INIXY1	5893485	02-12-2022	24,09,000	23,35,220	73,780	14,756
26	INIXY1	5893658	02-12-2022	24,09,000	23,35,220	73,780	14,756
27	INIXY1	5893755	02-12-2022	24,09,000	23,35,220	73,780	14,756
28	INIXY1	5893945	02-12-2022	24,09,000	23,35,220	73,780	14,756
29	INIXY1	5894123	02-12-2022	24,09,000	23,35,220	73,780	14,756
30	INIXY1	5894606	02-12-2022	24,09,000	23,35,220	73,780	14,756
31	INIXY1	5896048	02-12-2022	24,09,000	23,35,220	73,780	14,756
32	INIXY1	5896052	02-12-2022	24,09,000	23,35,220	73,780	14,756
33	INIXY1	5896106	02-12-2022	48,18,000	46,70,441	1,47,559	29,512
34	INIXY1	5896122	02-12-2022	48,18,000	46,70,441	1,47,559	29,512
35	INIXY1	5896966	02-12-2022	48,18,000	46,70,441	1,47,559	29,512
36	INIXY1	5896970	02-12-2022	60,22,500	58,38,051	1,84,449	36,890
37	INIXY1	5896972	02-12-2022	48,18,000	46,70,441	1,47,559	29,512
38	INKPK6	1451334	01-06-2023	10,14,075	5,27,148	4,86,927	97,385
39	INKPK6	1559022	06-06-2023	12,66,350	10,75,989	1,90,361	38,072
40	INKPK6	2421260	13-07-2023	10,60,150	4,02,563	6,57,588	1,31,518
41	INKPK6	4898485	18-10-2022	31,47,300	29,18,112	2,29,188	45,838
42	INKPK6	5087203	28-10-2022	10,12,704	8,07,204	2,05,500	41,100
43	INKPK6	5118444	29-10-2022	11,83,680	10,35,720	1,47,960	29,592
44	INKPK6	5151505	31-10-2022	7,89,120	6,90,480	98,640	19,728
45	INKPK6	5578079	19-11-2022	16,34,989	16,28,517	6,472	1,294

46	INKPK6	5940544	05-12-2022	12,04,500	6,68,899	5,35,601	1,07,120
47	INKPK6	6039788	09-12-2022	6,36,779	5,32,389	1,04,390	20,878
48	INKPK6	6154462	14-12-2022	2,77,035	2,69,326	7,709	1,542
49	INKPK6	6213288	16-12-2022	11,04,300	10,22,500	81,800	16,360
50	INKPK6	6348287	22-12-2022	2,78,120	2,29,040	49,080	9,816
51	INKPK6	6470319	27-12-2022	14,11,050	13,71,786	39,264	7,853
52	INKPK6	6631391	02-01-2023	5,72,600	4,90,800	81,800	16,360
53	INKPK6	7532047	04-02-2023	20,75,691	19,59,988	1,15,703	23,141
54	INKPK6	8057437	25-02-2023	31,51,103	28,78,785	2,72,318	54,464
55	INKPK6	8221190	03-03-2023	2,59,718	1,98,720	60,998	12,200
56	INKRI1	2368692	11-07-2023	22,01,850	21,40,688	61,163	12,233
57	INMUN1	1221757	23-05-2023	4,31,400	4,07,750	23,650	4,730
58	INMUN1	1221760	23-05-2023	3,45,120	3,26,200	18,920	3,784
59	INMUN1	6548855	05-01-2024	92,813	87,656	5,156	1,031
60	INMUN1	6548864	05-01-2024	74,250	70,331	3,919	784
61	INMUN1	6548867	05-01-2024	92,813	87,615	5,198	1,040
62	INMUN1	6549796	05-01-2024	92,813	87,615	5,198	1,040
63	INMUN1	6701656	12-01-2024	9,08,037	7,99,597	1,08,440	21,688
64	INVTZ1	3908505	13-09-2023	14,50,008	14,20,416	29,592	5,918
65	INVTZ1	4592097	12-10-2023	11,41,686	9,47,100	1,94,586	38,917
66	INVTZ1	5548719	24-11-2023	4,08,456	3,77,163	31,293	6,259
67	INVTZ1	5651120	29-11-2023	3,06,342	2,25,639	80,703	16,141
68	INVTZ1	6069061	15-12-2023	1,25,971	90,805	35,166	7,033
69	INVTZ1	6719803	12-01-2024	11,46,240	10,01,128	1,45,112	29,022
70	INVTZ1	672083	12-01-	11,46,240	10,01,128	1,45,112	29,022

		6	2024				
71	INVTZ1	7200156	01-02-2024	7,12,328	5,47,628	1,64,700	32,940
72	INVTZ1	7200258	01-02-2024	7,12,328	5,47,628	1,64,700	32,940
	Total			**17,26,06,280**	**16,25,88,802**	**1,00,17,478**	**20,03,496**

8.4.3 In respect of these 72 shipments, it appears the exporter had not declared the true facts, before the customs authorities at the port of export at the time of effecting exports. It appears they have declared the higher ocean freight amounts in their export documents such as shipping bills filed by them, in comparison to the actual freight amounts paid by them to the freight forwarders/shipping lines.

It appears that the exporter had recovered the higher freight amounts from the overseas buyers of the export goods in comparison to the amounts paid by them to the freight forwarders & shipping lines in respect of their export shipments. These facts have been confirmed from the copies of the freight invoices submitted by them under the provisions of section 108 of the Customs Act, 1962.

8.4.4 For ready reference, copy of **Shipping Bill No 4610612 dated 03-10-2022 (RUD-12)** is pasted below. As per the shipping bill, the ocean freight amount declared in respect of the said shipment is **Rs.66,50,150/- (USD 84500)** whereas during investigation, the exporter had submitted the actual freight amount paid by them in respect of the aforesaid shipping bill which stood at **Rs. 62,35,423 /- (USD 79230)**.

Thus, excess freight amount declared in respect of the aforesaid shipment works out to **Rs. 4,14,727 /- (USD 5270).** The said excess freight amount has also been recovered by the exporter from the overseas buyer of the export goods but the exporter had not paid duty on the said excess freight amount which is part and parcel of the actual assessable value of the export goods.

Photo of Shipping Bill No 4610612 dated 03-10-2022

INDIAN CUSTOMS EDI SYSTEM
CENTRAL BOARD OF INDIRECT TAXES AND CUSTOMS
DEPARTMENT OF REVENUE - MINISTRY OF FINANCE
GOVERNMENT OF INDIA

CUSTOM HOUSE, NEAR BALAJI TEMPLE, KANDLA - 370210

Port Code	SB No		SB Date
INIXY1	4610612		03-OCT-22
IEC/Br	ABECS8262N		0
GSTIN/TYPE	27ABECS8262N1ZN GSN		
CB CODE	AADFK8760CCH001		
TYPE	INV	ITEM	CONT
Nos	1	1	0
PKG	20000	G.WT MTS	1002.8

* SB22271020221734

PART - I - SHIPPING BILL SUMMARY

A STATUS

1.MODE	2.ASSESS	3.EXMN	4.JOBBING	5.MEIS	6.DBK	7.RODTP	8.DEEC/DFIA	9.DFRC	10.RE-EXP	11.LUT
SEA	Y	Y	N	Y	Y	Y	N	N		Y

12.PORT OF LOADING	INIXY1 (Kandla)	13.COUNTRY OF FINALDESTINATIO	MADAGASCAR
14.STATE OF ORIGIN	MAHARASHTRA	15.PORT OF FINAL DESTINATION	MGTMM (Tamatave (Toamasina))
16.PORT OF DISCHARGE	MGTMM (Tamatave (Toamasina))	17.COUNTRY OF DISCHARGE	MADAGASCAR

B DECLARAN DETAILS

1.EXPORTER'S NAME & ADDRESS		7.CONSIGNEE NAME & ADDRESS	
PAGARIYA EXPORTS PRIVATE LIMITED		TO ORDER	
PLOT NO 19 , HOUSE 1256/U1			
GREAT NAG ROAD, RAMBAGH			
NAGPUR	2.Type Private	MG	
3. AD CODE:	0230187	8. GSTIN / TYPE	27ABECS8262N1ZN GSN
4.RBI WAIVER NO.& DT		9.FOREX BANK A/C NO.	60XXXXXX482
5.CB NAME	KRISHNA SHIPPING & ALLIED SERVICES	10.DBK BANK A/C NO.	60XXXXXX482
6.AEO		11. IFSC NO.	MAHB0000005

C.VALU SUMMA

1.FOB VALUE	2.FREIGHT	3.INSURANC	4.DISCOU	5.COM
25217852.02	6650150	5498	0	236100
6.DEDUCTIONS	7.P/C		8.DUTY	9.CESS
0	0			5043570

D. EX.PR.

1.DBK CLAIM	2. IGST AMT	3.CESS AMT
7500		5043570
4.IGST VALUE	5.RODTEP AMT	6.ROSCTL AMT
	252179	0

E MANIFEST DETAILS

1.MAWB NO.	2.MAWB DT	3.HAWB NO.	4.HAWB DT	N.O.C.
4. CIN NO.		5. CIN DT.	6. CIN SITE ID	
22PCEG1027336560500		27-OCT-22	INIXY1	

F.INVOICE SUMMARY

1.SNO	2.INV NO.	3. INV AMT.	4.CURRENC
1	SW22Y-00258	405000	USD

1.CONTAINER	2.SEAL	3.DATE	4.S No

1SR.NO	2.CHALLAN NO	3.PAYMT DT	4.AMOUNT
1	100061	19-OCT-22	5043570

PART - II - INVOICE DETAILS

A. REF

1.S.No	2.INVOICE No. & Dt.	3.P.O.No. & Dt.	4.LoC No. & Dt	5.Contract No.&Dt	6.AD code	7.INVTERM
1	SW22Y-00258 30/09/2022				0230187	CIF

B. TRANSACTION PARTIES

1.EXPORTER'S NAME & ADDRESS	2.BUYER'S NAME & ADDRESS
PAGARIYA EXPORTS PRIVATE LIMITED	EMPIRE FOOD FZ-LLC
PLOT NO 19 , HOUSE 1256/U1	U.A.E
GREAT NAG ROAD, RAMBAGH	
440018	
3.THIRD PARTY NAME & ADDRESS	**4.BUYER AEO STATUS**

C.VAL DTLS

1.INVOICE VALUE	2.FOB VALUE	3FREIGHT	4.INSURANCE	5DISCOUN	6.COMMISON	7.DEDUCT	8.P/C	9.EXCHANGE RATE
405000 USD	320430.14 USD	84500 USD	69.86 USD	0	3000 USD	0		1 USD INR 78.7

1.ItemSNo	2.HS CD	3.DESCRIPTION	4.QUANTITY	5.UQC	6.RATE	7.VALUE(F/C)
1	10063090	INDIAN WHITE RICE (50 KG YELLOW PP BAGS) (INDIAN ORIGIN)	1000	MTS	405	405000

Bank Realisation certificate for Shipping Bill No. 4610612 dated 03-10-2022

DIRECTORATE GENERAL OF FOREIGN TRADE

STATEMENT OF BANK REALISATION

1	Firm Name	PAGARIYA EXPORTS PRIVATE LIMITED					
2	Address/GSTIN	PLOT NO 19 , HOUSE 1256/U1GREAT NAG ROAD, RAMBAGH,NAGPUR-440018					
3	IEC	ABECS8262N					
4	Shipping Bill / Invoice No.	4610612					
5	Shipping Bill / Invoice Date	03-10-2022					
6	Shipping Bill Port	INIXY1					
7	Bank Name	BANK OF MAHARASHTRA					
8	Bill ID No.	0000523GC5004617					
9	Bank Realisation Certificate No.	MAHB0000005238005689 Dated 09-03-2023					
10	Date of Realisation of Money by Bank	06-12-2022					
11	Total Realised Value	4,68,741.60					
12	Commission,Discount, Insurance, Freight and Other Deductions	Commission	Discount	Insurance	Freight	Other	
		0.00	0.00	0.00	0.00	0.00	
13	Net Realised Value	4,68,741.60					
14	Currency of Realization	USD					
15	Date and Time of Printing	20-07-2024 02:37:20 PM					
16	QR Code Scan to Validate Online on DGFT Website: https://www.dgft.gov.in		17	Source (Bank / Exporter)	Bank		

Invoice No. SW22Y-00258 dated 30-09-2022 in respect of Shipping Bill No. 4610612 dated 03-10-2022 having total value of USD 469000 (inclusive of export duty amount) and inclusive of declared freight amount of USD 84500.

INVOICE

Exporter:
PAGARIYA EXPORTS PRIVATE LIMITED
(Formerly Known as Shah Nanji Nagsi Overseas Pvt. Ltd.)
PLOT NO. 19, HOUSE NO. 1256/U1,,GREAT NAG ROAD,,RAMBAGH,NAGPUR - 440018,NAGPUR,INDIA,MAHARASHTRA
GST No.: 27ABECS8262N1ZN

BANK DETAILS:
BANK OF MAHARASHTRA, SITABULDI BRANCH,
MAHABANK BUILDING, MUNJE SQUARE, SITABULDI,
NAGPUR - 440012,
SWIFT CODE: MAHBINBBNGP A/C NO: 60385278482
CORRESPONDING BANK DETAILS:
BANK OF NEW YORK, NEW YORK
SWIFT CODE: IRVTUS3N, A/C NO: 8033165537
AD CODE: 0230187-6400009

Consignee:
EMPIRE FOOD FZ-LLC
FDAUO261 COMPASS BUILDING, AL SHOHADA ROAD,,AL HAMRA INDUSTRIALZONE-FZ, RAS AL KHAIMAH,,UNITED ARAB EMIRATES - 999999,OTHER COUNTRY

Exporter Ref.
CIN : U01110MH2020PTC349438
IEC No. : ABECS8262N
RBI No : NGPS19831A
FDA Req. No :

Invoice No. & Date	: SW22Y-00258	30-SEP-22
Buyer's Contract No.	: SELF	21-SEP-22
Contract No.	: SE22Y-00295	21-SEP-22
L.C. No. & Dt of Issue	:	

Buyer if other than consignee

Carriage By	Vessel no	Place of Receive	Port of Discharge
SEA	MV AUTUMN SEA	KANDLA, INDIA	TAMATAVE, MADAGASCAR
B/L No	**Vessel Sailing Date**	**Port of Loading**	**Final Destination**
KDL/AS/16, 17, 18 & 19	27-OCT-22	KANDLA, INDIA	TAMATAVE, MADAGASCAR

Mark & No.	No. of Pkgs	Description of goods	Packing	HS Code	Quantity MT	Rate in USD $	Amount in USD $
RIZ DULEX	20000	INDIAN WHITE RICE	50 KG PP BAGS	10063090	1000.000	405.00	405000.00
Total :	20000 Bags	Gross Wt. :	1002.800	Net Wt. :	1000.000		405000.00
					Add: Export Duty		64000.00
					Balance Invoice Value		64086.0228 469000.00

Total Invoice Value(In Words) : USD-Four Hundred Sixty Nine thousand Only.

Terms of delivery & payments:

1. 10% advance and 90% on Arrival of vessel (LOI will be shared as per payment received). Full payment to be received well within 7 days from the discharge of the cargo at Custom Bonded Warehouse at POD.
2. CIF TAMATAVE, MADAGASCAR// Commission USD 3/MT.// Stuffed 2% empty bags free of cost.
3. Export under claim drawback Drawback Serial No: 100604B
4. "Supply meant for export without payment of Integrated tax under Letter of Undertaking.(ARN NO.AD270822014477Z)"
5. End Use Code : Fsh 100 / We intend to claim reward under RoDTEP scheme.

Balance = USD 469000.00 = USD-Four Hundred Sixty Nine thousand Only.

Country of Origin of goods: INDIA

Container Nos : , MVAU2580000

We hereby certify that the goods supplied are of 100% Indian Origin.
Declaration : We declare that this invoice shows the actual price of goods described and that all particulars are true and correct.

For PAGARIYA EXPORTS PRIVATE LIMITED

PAGARIYA EXPORTS PRIVATE LIMITED NAGPUR

Authorized Signatory

Image of actual freight amount in invoice or letter submitted by the exporter in respect of Shipping Bill No. 4610612 dated 03-10-2022 showing freight rate of 79 USD per MT. (This freight invoice is in respect of Gross Weight of 3510.2 MTs of rice (net weight 3500 MTs), therefore, for 1000 MTs of rice out of 3500, exported via above mentioned shipping bill, the *pro-rata* actual freight amount is USD 79230).

RBB SHIP CHARTERING PTE LTD
160, Robinson Road, #14-04, Singapore Federation Center, Singapore 068 907
UEN - 202201648W

Freight Invoice

Invoice No: **RBB-AS-0428102022**
Invoice Date: **28-Oct-22**
Bill to:
PAGARIYA EXPORTS PRIVATE LIMITED
(FORMERLY KNOWN AS SHAH NANJI NAGSI OVERSEAS PRIVATE LIMITED)
PLOT NO. 19, HOUSE NO. 1256/U1,
GREAT NAG ROAD, RAMBAGH, NAGPUR- 440018,
MAHARASHTRA, INDIA

Vessel Name: **MV Autumn Sea**
IMO Number: **9639775**
Port of Loading: **Kandla**
Port of Discharge **Tamatave**

C/P DD	Description	Quantity (MTS) Gross	Frieght (USD) Per Mt	Amount(USD $)
07-10-2022	Bagged Rice Ocean Freight	3510.2	79.00	$277,306
	Total			$277,306

In Words: **USD Dollars Two Hundred Seventy Seven Thousand Three Hundred Six Only**

Payment Terms: Immidiatley
Payment Instructions
Remit To: **RBB SHIP CHARTERING PTE LTD**

Bank Details:
BRANCH ADDRESS : OVERSEA-CHINESE BANKING CORPORTATION SINGAPORE LIMITED SINGAPORE
ADDRESS : OCBC BANK, 65 CHULIA STREET OCBC CENTRE SINGAPORE 049513
Singapore 180001

Swift Code: **OCBCSGSG**
USD A/C Number: **601452063201**
In favour of RBB SHIP CHARTERING PTE LTD

RBB SHIP CHARTERING PTE LTD SINGAPORE

8.5 Excess Insurance premium amounts wrongly declared in the Shipping Bills :

8.5.1 In addition to the above, in respect of the following 25 shipments of rice, the exporter declared higher insurance amounts in comparison to the actual insurance amounts paid by them, thus causing short payment of duty on the differential insurance amounts. The total insurance amount declared by the exporter in respect of these 25 shipments stood at **Rs. 64,710/-,** whereas the exporter, vide his email dated 16.04.2026, had submitted the details of actual insurance amounts paid by them in respect of the said 25 shipments, which stood at only **Rs. 45,258/-.** Accordingly, the exporter has claimed excess insurance amounts of **Rs. 19,452/-** in respect of these 25 shipment

Table-C

S. No.	Custom House Code	SB Number	SB Date	Sum Of Declared Fob Value In Rs	Sum Of Declared Cess Amount In Rs	Declared Insurance amounts In Rs	Actual Insurance amounts In Rs	Excess insurance amounts In Rs

1	INIXY1	4610353	03-10-2022	2,32,50,691	46,50,138	5,159	2,851	2,308
2	INIXY1	4610391	03-10-2022	2,32,50,691	46,50,138	5,159	2,851	2,308
3	INIXY1	4610393	03-10-2022	2,32,50,691	46,50,138	5,159	2,851	2,308
4	INIXY1	4610426	03-10-2022	2,32,50,691	46,50,138	5,159	2,851	2,308
5	INIXY1	4610612	03-10-2022	2,52,17,852	50,43,570	5,498	2,851	2,647
6	INIXY1	5576983	19-11-2022	1,16,27,759	23,25,552	2,425	2,319	106
7	INIXY1	5729237	25-11-2022	1,21,26,429	24,25,286	2,467	2,359	108
8	INIXY1	5776653	28-11-2022	1,21,26,429	24,25,286	2,467	2,359	108
9	INIXY1	5777786	28-11-2022	1,21,26,429	24,25,286	2,467	2,359	108
10	INIXY1	5781929	28-11-2022	1,21,26,429	24,25,286	2,467	2,359	108
11	INKPK6	4676973	07-10-2022	32,78,156	6,55,631	709	679	30
12	INKPK6	4719943	10-10-2022	69,25,495	13,85,099	1,478	1,315	164
13	INKPK6	4783433	13-10-2022	70,12,305	14,02,461	1,558	1,491	68
14	INKPK6	4898485	18-10-2022	1,40,63,041	28,12,608	2,969	2,841	128
15	INKPK6	5203306	02-11-2022	62,93,200	12,58,640	1,314	1,257	58
16	INKPK6	8057436	25-02-2023	40,19,032	8,03,806	771	737	34
17	INKPK6	9618428	28-04-2023	39,26,338	7,85,268	744	711	33
18	INKRI1	2367892	11-07-2023	2,32,34,181	46,46,836	4,389	1,655	2,734
19	INKRI1	2368159	11-07-2023	2,32,34,181	46,46,836	4,389	1,655	2,734
20	INKRI1	2375510	11-07-2023	1,27,89,387	25,57,877	2,422	1,612	810
21	INMUN1	1303624	26-05-2023	28,21,809	5,64,362	510	488	22
22	INMUN1	1343848	27-05-2023	1,12,87,232	22,57,446	2,041	1,953	88
23	INVTZ1	3321728	19-08-2023	51,14,182	10,22,836	919	879	40
24	INVTZ1	3322380	19-08-2023	98,79,896	19,75,979	1,777	1,700	77
25	INVTZ	92547	13-04-	611	122	292	280	12

	1	06	2023					
				31,22,33,136	**6,24,46,625**	**64,710**	**45,258**	**19,452**

8.5.2 In respect of these shipments also, the exporter had not declared the true facts, before the customs authorities at the port of export at the time of effecting exports. They have **declared the higher Insurance paid amounts in their export documents** such as shipping bills filed by them, in comparison to the actual insurance amounts paid by them to the Insurance companies. It is a fact on record that the exporter had recovered the higher insurance amounts from the overseas buyers of the export goods in comparison to the insurance amounts actually paid by them to the insurance companies in respect of their export shipments. These facts have been confirmed by the exporter in the details of their export shipments submitted by them under the provisions of section 108 of the Customs Act, 1962.

8.6 For reimbursement of the export duty from the overseas buyer, the exporter had declared RBI Accounting Purpose code No. P1306 (RUD-13) which is for refund of taxes, however, the following discussion indicate that the said purpose code is not meant for the receipt of export duty and export proceeds -

8.6.1 The exporter has claimed that the export duty amounts paid by them at the time of export in the shipping bill have been received by them from the overseas buyers in the form of reimbursement of taxes under RBI purpose code P1306 through separate invoices raised by them to the buyers. RBI purpose codes are unique identifiers assigned to various international transactions, enabling banks and financial institutions to classify and process remittances accurately. RBI has notified purpose codes for reporting forex transactions for Payment and Receipt purposes.

8.6.2 The Purpose codes for reporting forex transactions (for the purpose of *Receipt of amounts)* are further categorized into 16 different 'Purpose Group Name' which includes Exports (of Goods), Transportation, Travel, Financial Services, Royalties & License Fees, Transfers among others. The following purpose codes pertaining to Export (of Goods) refers to the receipt of forex in respect of exports made from India.

Gr. No.	Purpose Group Name	Purpose Code	Description
01	Exports (of Goods)	P0101	**Value of export bills negotiated / purchased/discounted etc**. (covered under GR/PP/SOFTEX/EC copy of shipping bills etc.)
		P0102	**Realisation of export bills** (in respect of goods) **sent on collection** (full invoice value)
		P0103	**Advance receipts** against export contracts, which will be covered later by GR/PP/SOFTEX/SDF
		P0104	Receipts against **export of goods not covered** by the GR/PP/SOFTEX/EC copy of shipping bill etc.
		P0105	**Export bills** (in respect of goods) **sent on collection.**
		P0106	**Conversion of overdue export bills** from NPD to collection mode
		P0107	**Realisation of NPD export bills (full value of bill to be reported)**

8.6.3 Further, the purpose code P1306 referred by the exporter for reimbursement of taxes (i.e. export duty) falls under the group 'Transfer'.

Gr. No.	Purpose Group Name	Purpose Code	Description
13	Transfers	P1301	Inward **remittance** from Indian non-residents **towards family maintenance and savings**
		P1302	**Personal gifts and donations**
		P1303	**Donations to religious and charitable institutions in India**
		P1304	**Grants and donations to governments and charitable institutions established by the governments**
		P1306	**Receipts / Refund of taxes**

8.6.4 From the above, it is evident that the purpose codes under the group 'Transfer' pertains to forex transactions of personal nature such as personal gifts, family maintenance, donations etc. and the accounting purpose code P1306 falling under the said category is clearly not associated with the payments received in respect of exported goods.

8.6.5 Thus, **the exporter appears to have used wrong purpose for receipt of the export duty amounts from the buyers** and therefore mis-represented the facts before the bank authorities to process the receipt of export duty amounts received from the overseas buyer. These amounts are not reflected in the bank realisation certificates obtained by the exporter from the bank.

9. The aforesaid **reimbursement of duty paid amounts** taken by the exporter separately as detailed in Tables **A, B & C** above, by raising separate commercial invoices having full transaction value (inclusive of export duty amounts) and by declaring higher freight and insurance amounts in shipping bills which were not included in the declared FOB Value of goods in respect of these shipments, as discussed in para 8 above, the exporter appears to have evaded export duty by undervaluing the assessable/transaction value of the exports. Investigation has revealed that these **reimbursements of duty paid amounts** have also been claimed and recovered by them from the overseas buyer of the export goods in their bank accounts. Therefore, the reimbursement of export duty amounts and excess freight & insurance amounts taken by the exporter from the overseas buyer in any manner over and above the declared invoice value **appears to be forming part of the consideration received by the exporter** for delivery of the export goods on board the vessel after clearance of the shipments through the customs authorities at the port of export. Thus, excess amounts (equivalent to the export duty paid amounts) recovered separately from the overseas buyer over and above the declared invoice price as reimbursement of export duty, as discussed in above paras, also appear **liable to be included in the FOB Value for the purpose of calculation of the export duty**. Likewise, the excess freight amounts and insurance premium declared in the Shipping Bills over and above the actual freight and insurance premium paid to the freight forwarder/shipping line and insurance agent, though recovered from the overseas buyer but not included in the declared FOB value for payment of export duty, also appear liable to inclusion in the FOB value for the purpose of computation of export duty.

10. Legal Provisions:

10.1 Statutory provisions of the Customs Act, 1962 relevant to this case are enclosed as **Annexure-A** to this investigation report and the same are briefly discussed below:

10.2 The provisions of section 2(18), section 14 & section 16 of the Customs Act, 1962, Customs Valuation (Determination of Value of Export Goods) Rules, 2007, CBIC Circular No. 18/2008-Cus. dated 10.11.2008 are relevant for understanding various aspects of valuation of the export goods in the context of present case:

a. The term 'export' has been defined in "Section 2(18) of the Customs Act, 1962 as "export", with its grammatical variations and cognate expressions, means taking out of India to a place outside India."
b. Section **14 of the Customs Act 1962, stipulates that 'f**or the purposes of the Customs Tariff Act, 1975 (51 of 1975), or any other law for the time being in force, the value of the ………export goods shall be the transaction value of such goods, that is to say, **the price actually paid or payable for the goods** when sold ……….. for export from India **for delivery at the time and place of exportation**, where the buyer and seller of the goods are not related and price is the **sole consideration** for the sale subject to such other conditions as may be specified in the rules made in this behalf.
c. In this provision the terms **"the price actually paid or payable for the goods" and "when sold for export from India for delivery at the time and place of exportation"** in the context of present case are very significant. For the process of export to be complete, the goods need to be taken out of India to a place outside India. This event can take place only after goods cross Indian borders. This is more so because the price has to be taken for sale of export goods when sold for export from India 'for delivery at the time and place of exportation'. The wording **"for the delivery-at the time and place for exportation"** has to be legally construed as "for delivery at the time and place of exportation on board the foreign going vessel". Thus, the time and place of delivery of the export goods will be when the goods are on-board the foreign going vessel which takes place after the goods are given a Let Export Order (LEO) by the jurisdictional Customs officer after examining the compliance to Customs law. By implication, all elements of cost that are required to be incurred to bring the goods 'for delivery at the time and place of exportation' to the foreign going vessel will have to be added to invoice price to arrive at a correct transaction value of export goods as per section 14 notwithstanding the manner as to how the financial transaction is organized by the exporter and the overseas buyer. It is amply clear that without incurring associated expenses the export goods cannot be simply brought to the place of exportation at the time of export. Thus, in the impugned case, the price payable for the export goods for delivery at the time and place of exportation can be arrived at only after inclusion of associated costs including the amounts equal to the export duty which have been recovered by the exporters from the overseas buyers of the export goods.
d. "FOB value" means the price actually paid or payable to the exporter for goods when the goods are loaded onto the carrier at the named port of exportation including the cost of the goods and all costs necessary to bring the goods onto the carrier at included in the term 'FOB Value'. The valuation shall be made in accordance with the World Trade Organisation (WTO) Agreement on Implementation of rule VII of General Agreement on Tariffs and Trade (GATT), 1994. There cannot be an exception to the well laid down principles of valuation.
e. This method of calculation of 'FOB Value' is prescribed in various trade facilitation agreements such as 'Asean India Free Trade Agreement (AIFTA)' in a very clear manner as follows. FOB value shall be calculated in the following manner, namely:

(a) FOB Value = ex-factory price + other costs

(b) Other costs in the calculation of the FOB value shall refer to the costs incurred **in placing the goods in the ship** for export, **including but not limited to**, domestic transport costs, storage and warehousing, **port handling**, brokerage fees, service charges, et cetera.

f. This in fact lays down the foundation for arriving at the assessable value of the export goods whereby various elements of costs, including the export duty, notwithstanding it is being paid to the exporter directly by the foreign buyer or otherwise, are required to be added to the invoice price. Costing exercise of addition of other cost elements in FOB Value is not limited to transit transportation cost, storage & warehousing alone. Without payment of export duty, let export order cannot be issued by the jurisdictional customs office and the goods cannot be loaded on the foreign going vessel to take them out of India. On this background it is observed that value of the export goods on which duty has been paid by the exporter of rice does not reflect an FOB value i.e. a price payable for delivery of goods at the time and place of exportation which is a basis for export assessment.

g. This practice of payment of export duty by considering the FOB Value as cum-duty FOB Value was prevalent prior to the year 2009. **CBIC Circular No. 18/2008-Cus. dated 10.11.2008** in this regard instructed that the existing practice of computation of the export duty by taking FOB price as the cum-duty price may be continued till 31.12.2008 and all the pending cases may be finalized accordingly. It was also clarified that with effect from 01.01.2009, the practice of computation of export duty shall be changed; that for the purposes of calculation of export duty, the transaction value, that is to say the price actually paid or payable for the goods for delivery at the time and place of exportation under section 14 of Customs Act 1962, shall be the FOB price of such goods at the time and place of exportation.

h. In order to bring in uniformity, transparency and consistency in assessment of export of Iron Ore, CBIC vide Circular No. 12/2014 –Customs dated 17.11.2014 directed the field formations *interalia* to monitoring the receipt of Bank Realisation Certificates for the purposes of comparison with the final invoices submitted by the exporter to satisfy the accuracy of the assessed values. It also indicates that the total consideration received by the exporter from the buyer for sale of the export goods have to be considered for assessment of the export goods. In shipments exported on FOB incoterm basis, duty has to be calculated on the total considerations received by the exporter from the buyer whether or not they are included in the BRC. For shipments exported on CIF/CF/CI inco-term basis, FOB Value has to be deduced from the CIF/CF/CI value by deducting the actual freight amounts and/or insurance premium amounts paid by the exporter as the case may be.

i. **Relevance of time of export is further proved as Section 16 of the Customs Act, 1962 which provides for the date for determination of rate of duty and tariff valuation of export goods, stipulate that t**he rate of duty and tariff valuation, if any, applicable to any export goods, shall be the rate and valuation in force,- (a) in the case of goods entered for export under section 50, on the date on which the proper officer makes an order permitting clearance and loading of the goods for exportation under section 51; (b) in the case of any other goods, on the date of payment of duty. The afore-said statutory provision also indicate that time of export is relevant for valuation of the export goods.

From the above, it is evident that from 01.01.2009 onwards, the transaction value shall be the FOB Value of the export goods and the FOB value shall not be treated as the Cum-duty price of the export goods. The above practice has to be followed for all export commodities irrespective of the description of the export goods.

11. The investigation into undervaluation of rice shipments exported by M/s. Pagariya Exports Pvt. Ltd. vide above mentioned Shipping Bills as discussed in **Tables A, B & C** above, revealed deliberate mis-statement and suppression of facts on part of the exporter, who appears to be actively involved in mis-declaration of the FOB value of export goods, with an intention to evade appropriate export duty leviable on *ad valorem* basis on such goods. In respect of these shipments mentioned in **Tables A** above, the exporter had claimed and recovered the export duty from the overseas buyer through separate invoices but the export documents filed before the customs authorities do not reflect these reimbursement amounts indicating mis-declaration and suppression of the actual transaction value. In respect of shipments mentioned in **Table B** above, the exporter had intentionally mis-declared the freight amounts, and have deducted the excess freight amounts from the Invoice value recovered from the buyers thereby mis-declaring and suppressing the actual transaction value of the export goods. In respect of shipments mentioned in **Table C** above, the exporter had intentionally mis-declared the insurance premium amounts, and have deducted the excess insurance premium amounts from the Invoice value recovered from the buyers thereby mis-declaring and suppressing the actual transaction value of the export goods. Thus, the exporter appears to have not declared the actual FOB Values in the shipping bills mentioned in **Tables A, B & C above,** thereby intentionally evading the applicable duties of customs on such export duty reimbursement amounts/ excess freight and insurance amounts claimed and recovered by them from the buyers of the export goods.

12. As discussed in above paras, the valuation of export goods under the Customs Act, 1962, is governed by the provisions of Section 14 ibid, read with the Customs Valuation (Determination of Value of Export Goods) Rules, 2007 [hereinafter referred as 'CVR (E), 2007']. As per the provisions of Section 14 of the Customs Act, 1962, **the value of export goods shall be the 'transaction value' of such goods, that is to say, the price actually paid or payable for the goods when sold for export from India for delivery at the time and place of exportation (i.e., the FOB price) when price is the sole consideration**. As such, the sum total of price paid by the overseas buyer for delivery at the time and place of exportation would be the 'transaction value' of such goods.

12.1 Further, for the purpose of charging export duty, the value to be considered is the FOB price since the terms "*for export from India for delivery at the time and place of exportation"* appearing in Section 14 of the Customs Act, 1962, actually means FOB (Free On Board) value. This has been clarified also by the Central Board of Excise and Customs (CBEC) vide Circular No. 18/2008, dated 10.11.2008, wherein it stated that in case of export shipments, *for the purposes of calculation of export duty, the transaction value, that is to say the price actually paid or payable for the goods for delivery at the time and place of exportation under section 14 of Customs Act 1962, shall be the FOB price of such goods at the time and place of exportation.*

12.2 In this case the value of the export goods shall be the transaction value thereof when the price is the sole consideration. As such, **for determination of the transaction value of the export goods, the sole consideration received by the exporter from the buyer should be taken in to account**, then it should be seen as to which prices are compulsory for delivery of the export goods on board the vessel. In this case, the exporter is insisting that the export duty is on reimbursement basis from the overseas buyer of the export goods. By doing so, the exporter is separately receiving a part of the export proceeds from the overseas buyer and not including the same in the assessable value of the export goods.

12.3 It can be stated that the seller has imposed a condition on the buyer of the export goods which states that if the buyer does not pay him a fixed amount (equal to the 20% export duty on their declared lesser FOB value), they would not sell the export goods to the overseas buyer and would not deliver the same at the time and place of exportation. Thus, in all such agreements wherein the seller had imposed a condition on the buyer by which buyer has to pay a part of the payment separately in the bank accounts of the seller on account of sale of the export goods, such payments are necessarily to be taken as part of the consideration received by the seller for sale of the export goods. All such amounts which are equal to the export duty amounts and excess freight and insurance amounts claimed and recovered from the buyer are liable to be added in their declared FOB Values for determination of their actual FOB Value for calculation of applicable export duties thereon.

13. The **method of calculation of FOB Value** has been provided at the website of various reputed platforms such as 'Freightos', which also support the contention that export duty is also includible in the FOB Value if the same has been recovered by the seller from the buyer.

The description of the said platform as available on their website under the heading 'About Freightos' states that

Freightos® (NASDAQ: CRGO) is the leading, vendor-neutral booking and payment platform for international freight, improving world trade. WebCargo® by Freightos and 7LFreight by WebCargo form the largest global air cargo booking platform, connecting airlines and freight forwarders. Over ten thousand freight forwarder offices, including the top twenty global forwarders, place thousands of eBookings a day on the platform with over fifty airlines. These airlines represent over 2/3rds of global air cargo capacity. Alongside ebookings, freight forwarders use WebCargo and 7LFreight to automate rate management, procurement, pricing and sales of freight services, across all modes, resulting in more efficient and more transparent freight services. More information is available at freightos.com/investors.

The website of freightos https://www.freightos.com/freight-resources/fob-calculator was visited which provide FOB calculator tools for the ease of international freight industory. As per the said website, *FOB (Free on Board) Calculator is a tool used in international trade to determine the total cost of goods when they are shipped from the seller's location to the buyer's destination.* ***The FOB price includes the cost of the goods, as well as various expenses incurred until the goods are loaded onto the vessel,*** *such as packaging, loading, and inland transportation to the port of departure.*

> *It does not include the freight charges for transporting the goods from the port of departure to the port of destination or any other charges* ***or taxes beyond the point of loading****.*

From the above details available on their website, **it is evident that all taxes before the point of loading of the export goods on board the vessel are included in the term 'FOB'**. In the case of export of goods, loading of the export goods starts after issuance of the 'Let Export Order (LEO)' by the proper officer of the Customs. **LEO is issued after payment of the export duty**. As the export duty is leviable **before the point of loading** of the export goods on to the vessel the same is includible in the FOB Value of the export goods.

13.1 The above contention of DRI is also supported by the **Incoterms** which are widely used in the international transactions. **Incoterm or International Commercial Terms** which are a series of pre-defined commercial terms published by the International Chamber of Commerce (ICC) relating to international commercial law. **These incoterms define the responsibility of the importers and exporters in the arrangement of shipments and transfer of liability involved at various stages of transaction.** They are widely used in the international commercial transactions and procurement processes. These incoterms rules are accepted by governments, legal authorities worldwide for the interpretation of most commonly used terms in the international trade. They are intended to reduce or remove altogether uncertainties arising from the differing interpretations of the rules in different countries. **As per Wikipedia,** ***the Incoterms 2020 is the ninth set of international contract terms published by the International Chamber of Commerce with the first set published in 1936*** **(RUD-14). As per Incoterms 2020 published by ICC, the term 'FOB' has been defined as under -**

> *FOB – Free on Board (named port of shipment)*
>
> *Under FOB terms* ***the seller bears all costs and risks up to the point the goods are loaded on board the vessel****. The seller's responsibility does not end at that point unless the goods are "appropriated to the contract" that is, they are "clearly set aside or otherwise identified as the contract goods".*[20] *Therefore, FOB contract requires a seller to deliver goods on board a vessel that is to be designated by the buyer in a manner customary at the particular port.* ***In this case, the seller must also arrange for export clearance.*** *On the other hand, the buyer pays cost of marine freight transportation, bill of lading fees, insurance, unloading and transportation cost from the arrival port to destination.*

As per the allocation of costs to buyer/seller according to incoterms 2020, in FOB terms, all costs related to loading of the export goods at origin, **export custom declaration**, carriage to the port of export, unloading of truck in port of export, loading on vessel/airplane in the port of export have to be borne by the seller of the goods and other expenses such as carriage to the port of import, insurance, unloading in port of import, loading on truck in port of import, carriage to the place of destination, import custom clearance, import duties and taxes and unloading at destination have to be borne by the buyer of the goods. Thus, all cost until the loading of the export cargo on board the foreign going vessel have to be borne by the seller of the export goods which also include export customs declaration and cost related to it. Thus, it is evident that the export duty is includible in the FOB Value and the same have to be borne by the seller and it cannot be recovered by the seller from the overseas buyer. If the same is recovered, it becomes part of the consideration for sale of the export goods and thus becomes liable to be included in the FOB Value of the export goods.

14. Rejection & Redetermination of the Transaction Value:

14.1 As discussed in the above paragraphs, valuation of export goods under the Customs Act, 1962, is governed by the provisions of Section 14, ibid, read with the Customs Valuation (Determination of Value of Export Goods) Rules, 2007 [here-in-after referred as the CVR (E), 2007]. The export proceeds receivable in full consequent to negotiation and finalization of sale price between the exporter from India and their overseas buyer form 'transaction value' of such goods. The export Customs duty is leviable on the actual sale price at which the goods were sold. Where such sale price has been mis-declared and under-stated by the exporter, the actual sale price, i.e. the Transaction Value, needs to be taken into account for the purpose of valuation of the impugned export goods.

14.2 In respect of the shipments of rice covered by the Shipping Bills as shown in the **Tables A, B & C in para 8** above, it appears that M/s Pagariya Exports Pvt. Ltd. negotiated and finalized one price with their overseas buyer but while entering into the contracts, the said price was intentionally bifurcated in two parts. The amount of duty payable by the exporter was deducted from the transaction value. The shipping bills filed by the exporter reflect a transaction value which appears undervalued and mis-declared as it was lesser than the price that was actually finalized with the overseas buyer as consideration for the export goods. A part of the consideration appears to be intentionally excluded from the transaction value of the export goods by adopting three different modus operandi as discussed in para 8 above.

14.3 The investigation shows that the difference between the actual price finalized with the overseas buyer and the price shown in the export documents were claimed and recovered by the exporter from the buyer separately by an arrangement of the buyer and the seller in this regard. The exporter and buyer may enter into any contract (oral or written), they may sell and purchase the export goods on any incoterms (such as FOB, CIF, CF, CI or ex-works basis) but for the purposes of calculation of the export duty, the transaction value in terms with the provisions of Section 14 of the Customs Act, 1962 has to be derived and such transaction value is the FOB Value of the export goods as discussed in above paras. Further, for the purpose of calculation of the FOB Value of the export goods, **abatement of the export duty is not available as per Section 14 of the Customs Act, 1962 read with CBIC Circular No. 18/2008-Customs dated 10.11.2008.**

14.4 The receipt of these export duty (reimbursement of duty) amounts was apparently never disclosed to the concerned Customs authorities. The said amounts were received from the overseas buyer, as reimbursement of taxes/duties under RBI Purpose code P1306 which is not meant for receipt of the export duty. The reduced FOB Value declared in the export documents was presented as the true Transaction Value being paid for the export goods by the overseas buyer. The reimbursement of duty amount was recovered separately by the exporter in their bank account by raising a separate invoice to the buyer which included the duty paid amounts also. Hence, it appears that the value declared by M/s Pagariya Exports Pvt. Ltd. to the concerned Customs authorities as the Transaction Value of the export cargo in respect of **339** shipments of rice covered by the Shipping Bills as shown in the **Tables A, B & C above**, is liable to be rejected under Rule 8 of the CVR(E), 2007 and the impugned export goods are liable to be valued at their actual Transaction Value as established by the present investigation, in accordance with the provisions of Section 14 of the Customs Act, 1962, read with Rule 3 of the CVR(E), 2007.

14.5 The amount wrongly excluded from the FOB price appears to be indeed part of the consideration negotiated and finalized between the exporter M/s Pagariya Exports Pvt. Ltd. and their respective overseas buyers and the said amount which was excluded from the FOB Value was actually duly claimed and received by the exporter from the overseas buyer in their bank account. Therefore, the differential value (equal to the amounts claimed/received separately as reimbursement of duty and excess freight & insurance amounts) as shown in the **Tables A, B & C** above appear to be includible in the declared value (FOB Value) of the respective export shipments to arrive at the correct transaction value at which the said goods were sold for export from India for delivery at the time and place of exportation and export Customs duty as per the prevailing rate needs to be charged on the said value. M/s Pagariya Exports Pvt. Ltd. appear to be liable to pay the resultant differential duty in addition to the duty already paid by them.

14.6 In view of the above, in accordance with the provisions of Section 14 of the Customs Act, 1962, the amount of differential customs duty in respect of the Shipping Bills as mentioned in the **Tables A, B & C** at **para 8 above**, wherein a part of export proceeds was apparently not declared to the concerned Customs authorities, or mis-declared by declaring excess freight and insurance amounts, and the same was not included in the declared transaction value has to be worked out on the basis of actual Transaction Value of the export goods revealed during the investigation.

15. Calculation of Differential Duty:

15.1 As discussed in above paras, the exporter had undervalued their export shipments of rice. For this three modus operandi were adopted by the exporter. In several export shipments, as detailed in **Table-A in para 8 above**, exporter had separately recovered the duty amounts from the overseas buyer of the goods through separate invoices raised to the overseas buyers. These facts were not declared by them before the customs authorities at the port of export. Admittedly, these amounts have also been claimed and recovered by the exporter from the overseas buyer on reimbursement basis. Since this was part of the separate commercial invoice, it implies that if the overseas buyer had not paid these amounts to the exporter, they would not have sold the export goods to the buyer. Thus, these amounts claimed and recovered from the buyers are also part of the consideration received by the exporter for sale of their export goods. These amounts separately claimed and recovered by the exporter from the buyer also appear liable to be included in the actual assessable value of the export goods and as summarized below, differential duty amount of **Rs. 15,51,37,940/-** is liable to be recovered from the exporter in respect of these separately reimbursed export duty amounts. The detailed calculation of differential duty is shown in **Annexure-I** to this investigation report.

Table – D

Custom House Code	**Number of SBs**	**Declared FOB Value (in Rs.)**	**Duty Amount Paid on declared FOB value (in Rs.)**	**Excess amounts recovered / recoverable through separate invoices (in Rs.)**	**Sum of re-determined FOB value in Rs.** (Declared FOB Value + Excess amounts recovered and recoverable equal to duty paid amounts) (in Rs.)	**Duty payable on Excess amounts recovered through separate invoices (which are equal to duty paid amounts) (in Rs.)**
Col.1	**Col.2**	**Col.3**	**Col.4**	**Col.5**	**Col.6 = Col.3 + Col.5**	**Col.7 = 20% of (Col.5)**
INIXY1	81	1,58,25,12,754	31,65,02,555	31,65,02,555	1,89,90,15,309	6,33,00,511
INVTZ1	93	98,59,70,187	19,71,94,043	19,71,94,043	1,18,31,64,230	3,94,38,809
INKPK6	93	70,70,71,230	14,14,14,254	14,14,14,254	84,84,85,484	2,82,82,851
INMUN1	47	39,07,35,469	7,81,47,097	7,81,47,097	46,88,82,566	1,56,29,419
INBOK6	16	10,27,76,648	2,05,55,331	2,05,55,331	12,33,31,979	41,11,066
INKRI1	5	8,64,43,789	1,72,88,757	1,72,88,757	10,37,32,546	34,57,751
INCCU1	3	2,09,74,451	41,94,891	41,94,891	2,51,69,342	8,38,978
INNSA1	1	19,63,853	3,92,771	3,92,771	23,56,624	78,554
Total	**339**	**3,87,84,48,383**	**77,56,89,699**	**77,56,89,699**	**4,65,41,38,082**	**15,51,37,940**

15.3 As discussed in above paras, it appears, in several export shipments, as detailed in **Table-B** in para 8 above, exporter had declared excess freight amounts in Shipping Bills. The actual freight amounts were not declared by them before the customs authorities at the port of export. These excess freight amounts appear liable to be included in the actual assessable value of the export goods and as summarized below, differential duty amount of **Rs.20,03,496**/- is liable to be recovered from the exporter in respect of these excess freight amounts. The detailed calculation of differential duty is shown in **Annexure-II** to this investigation report. Port-wise duty payable is as below-

Table - E

Port Code	**No. Of Sb**	**Declared Fob Value (in Rs.)**	**Duty Amount Paid on declared FOB value (in Rs.)**	**Excess Freight Amounts claimed (in Rs.)**	**Re-Determined Fob Value (in Rs.)** (Declared FOB value + Excess Freight amounts)	**Differential Duty Payable on excess freight amounts (in Rs.)**
Col.1	**Col.2**	**Col.3**	**Col.4**	**Col.5**	**Col.6 = Col.3 + Col.5**	**Col.7 = 20% of (Col.5)**
INIXY1	37	62,77,37,840	12,55,47,564	54,23,573	63,31,61,413	10,84,715
INKPK6	18	11,94,04,277	2,38,80,857	33,71,299	12,27,75,576	6,74,260
INKRI1	1	2,32,34,181	46,46,836	61,163	2,32,95,343	12,233
INMUN1	7	3,55,46,186	71,09,239	1,70,479	3,57,16,665	34,096
INVTZ1	9	9,31,88,528	1,86,37,706	9,90,965	9,41,79,493	1,98,193
	72	**89,91,11,011**	**17,98,22,202**	**1,00,17,478**	**90,91,28,489**	**20,03,496**

15.6 Apart from the above, in several shipments of rice, as detailed in **Table C** in para 8 above, the exporter had declared excess insurance amounts in comparison to the actual insurance amounts paid by them for the export goods. Only the insurance amounts actually paid by the exporter are eligible for deduction from the CIF value for calculation of the FOB Value of the export goods. Therefore, the excess insurance amounts declared by the exporter are not eligible/allowed for deduction as per the provisions of Section 14 of the Customs Act, 1962. These excess insurance amounts claimed by the exporter are also liable to be included in the actual assessable value of the export goods and as summarized below, differential duty amount of **Rs.3,890/-** is liable to be recovered from the exporter in respect of these excess insurance amounts also. The detailed calculation of differential duty is shown in **Annexure-III** to this investigation report.

Table-F

Custom House Code	**No. of SBs**	**Declared FOB Value (in Rs.)**	**Duty Amount Paid on declared FOB value (in Rs.)**	**Excess insurance amounts claimed (in Rs.)**	**Re-Determined Fob Value (in Rs.)** (Declared FOB value + Excess Insurance	**Differential Duty payable on excess Insurance amounts claimed (in Rs.)**

					amounts)	
Col.1	**Col.2**	**Col.3**	**Col.4**	**Col.5**	**Col.6 = Col.3 + Col.5**	**Col.7 = 20% of (Col.5)**
INIXY1	10	17,83,54,092	3,56,70,818	12,419	17,83,66,511	2,484
INKPK6	7	4,55,17,566	91,03,513	514	4,55,18,081	103
INKRI1	3	5,92,57,748	1,18,51,549	6,279	5,92,64,027	1,256
INMUN1	2	1,41,09,041	28,21,808	110	1,41,09,151	22
INVTZ1	3	1,49,94,689	29,98,937	130	1,49,94,819	26
	25	**31,22,33,136**	**6,24,46,625**	**19,452**	**31,22,52,588**	**3,890**

15.4 In view of the above-mentioned three modus operandi followed by the exporter for evasion of export duty, their re-determined assessable value in respect of total **339** export shipments have been calculated as shown in below table. Accordingly, the differential duty payable by the exporter M/s. Pagariya Exports Pvt. Ltd. works out to be at **Rs.15,75,71,510/-** as shown in below Table. The detailed calculation of the differential duty amounts has been shown in **Annexure - I, II & III** to this investigation report. The port wise summary of differential duty payable by M/s. Pagariya Exports Pvt. Ltd. is as under:

Table-G

Custom House Code	**No. of SBs**	**Declared FOB Value (in Rs.)**	**Duty Amount Paid on declared FOB value (in Rs.)**	**Re-Calculated FOB Value (in Rs.)**	**Duty payable on duty reimbursement amounts (in Rs.)**	**Duty Payable on excess freight (in Rs.)**	**Duty payable on Excess Insurance (in Rs.)**	**Total Duty Payable (in Rs.)**
Col.1	**Col.2**	**Col.3**	**Col.4**	**Col.5**	**Col.6**	**Col.7**	**Col.8**	**Col.9 = Col.6 + Col.7 + Col.8**
INIXY1	81	1,58,25,12,754	31,65,02,555	1,90,44,51,302	6,33,00,511	10,84,715	2,484	6,43,87,710
INVTZ1	93	98,59,70,187	19,71,94,043	1,18,41,55,324	3,94,38,809	1,98,193	26	3,96,37,028
INKPK6	93	70,70,71,230	14,14,14,254	85,18,57,297	2,82,82,851	6,74,260	103	2,89,57,213
INMUN1	47	39,07,35,469	7,81,47,097	46,90,53,155	1,56,29,419	34,096	22	1,56,63,537
INBOK6	16	10,27,76,648	2,05,55,331	12,33,31,979	41,11,066		-	41,11,066
INKRI1	5	8,64,43,789	1,72,88,757	10,37,99,987	34,57,751	12,233	1,256	34,71,240
INCCU1	3	2,09,74,451	41,94,891	2,51,69,342	8,38,978		-	8,38,978
INNSA1	1	19,63,853	3,92,771	23,56,624	78,554			78,554
Total	**33**	**3,87,84,4**	**77,56,89**	**4,66,41,7**	**15,51,37,9**	**20,03,**	**3,890**	**15,71,45**

	9	8,383	,699	5,011	40	496		,326

16. Obligation under Self-assessment and Reasons for raising duty demand by invoking extended period:

16.1 The exporter had subscribed to a declaration as to the truthfulness of the contents of the Shipping Bill in terms of Section 50(2) of the Customs Act, 1962, in all their export declarations. Further, consequent upon the amendment to Section 17 of the Customs Act, 1962 vide Finance Act, 2011, ***'Self-Assessment'*** had been introduced in Customs. Section 17 of the Customs Act, 1962, effective from 08.04.2011, provides for self-assessment of duty on export goods by the exporter himself by filing a Shipping Bill, in electronic form. Section 50 of the Customs Act, 1962 makes it mandatory for the exporter to make an entry for the export goods by presenting a Shipping Bill electronically to the proper officer. As per Regulation 4 of the Shipping Bill (Electronic Integrated Declaration and Paperless Processing) Regulation, 2019 (issued under Section 157 read with Section 50 of the Customs Act, 1962), the Shipping Bill shall be deemed to have been filed and self-assessment of duty completed when, after entry of the electronic declaration (which was defined as particulars relating to the export goods that are entered in the Indian Customs Electronic Data Interchange System) in the Indian Customs Electronic Data Interchange System either through ICEGATE or by way of data entry through the service centre, a Shipping Bill number was generated by the Indian Customs Electronic Data Interchange System for the said declaration. Thus, under the scheme of self-assessment, it was the exporter who must doubly ensure that he declared the correct classification / CTH of the export goods, the applicable rate of duty, value, the benefit of exemption notification claimed, if any, in respect of the export goods while presenting the Shipping Bill. Thus, with the introduction of self-assessment by amendment to Section 17, w.e.f. 08.04.2011, it was the added and enhanced responsibility of the exporter to declare the correct description, value, Notification, etc. and to correctly classify, determine and pay the duty applicable in respect of the export goods.

16.2 In view of the discussion supra, it is evident that the Directors and employees of the exporter firm M/s Pagariya Exports Pvt. Ltd., were well aware about the actual value of the export goods. They appear to have knowingly indulged in preparation and planning of manipulated export documents, which they used to forward to the Customs broker in relation to Customs clearance of the said export goods at the time of exportation by way of wilful mis-declaration and intentional suppression of these facts in the Shipping Bills filed by them and thus they appear to have evaded the applicable Customs duty on export of rice.

16.3 In the event of short levy of Customs duty by reason of collusion, any wilful mis-statement or suppression of facts by the exporter or the agent or employees of the exporter, such duty can be recovered by invoking extended period of five years as provided in **Section 28(4) of the Customs Act, 1962**. In this case, it appears that the exporter has knowingly and deliberately mis-declared the transaction value (i.e. FOB Value) of the export goods. Hence, the extended period of five years is rightly invokable in this case to recover the differential duty as detailed in **Annexure-I, Annexure-II and Annexure-III** of this Investigation Report. Further, M/s. Pagariya Exports Pvt. Ltd. are also liable to pay interest on their said differential duty liability as per the provisions of Section 28 AA of the Customs Act, 1962, at applicable rate.

17. From the scrutiny of the documents gathered/submitted during investigation by the exporter M/s. Pagariya Exports Pvt. Ltd., scrutiny of the export data and statement of Sh. Neel Umesh Pagariya, Director of M/s Pagariya Exports Pvt. Ltd. and Sh. Sudeep Madhusudan Kothari, Consultant (Accounts and Finance) of M/s Pagariya Exports Pvt. Ltd. involved in export of rice from various ports of India, it appears that—

i. Sh. Neel Umesh Pagariya, Sh. Umesh Parasmal Pagariya and Sh. Raj Umesh Pagariya, all Directors of M/s Pagariya Exports Pvt. Ltd. were the key persons who on behalf of M/s Pagariya Exports Pvt. Ltd. negotiated and finalized the sale price of rice, exported by M/s Pagariya Exports Pvt. Ltd. to various overseas buyers, vide **339** Shipping Bills as detailed in **Tables A, B & C in para 8** above. Sh. Sudeep Madhusudan Kothari, Consultant (Accounts and Finance) of M/s Pagariya Exports Pvt. Ltd. was also aware of the modus adopted by their export firm for evasion of duty on export of rice.

ii. The declared FOB value in respect of shipping bills listed in Tables **A, B & C** appear to be not reflecting the correct transaction value of the export goods;

iii. As discussed in above paras, the actual transaction value (i.e. FOB Value) was not declared by them in their export documents as they appear to have undervalued and mis-declared their transaction value with intent to evade applicable duty of customs which is leviable @ 20% *ad valorem* on the actual transaction value of the export goods in following manners:

- In respect of the shipping bills listed in **Table A**, above the declared FOB Value indicates undervaluation by them by an amount equal to the amount of duty paid by them on export of rice cargo which was actually recovered by them from the buyer by submitting a different Invoice for the same export shipment. Thus, exporter had out rightly mis-declared the actual transaction value at the time of export.

- In respect of Shipping bills listed in **Table B** above, the FOB Value declared indicates an undervaluation by them by an amount equal to the excess freight amounts declared by them in the Shipping Bills. Thus, exporter appears to have out rightly mis-declared the actual transaction value at the time of export.

- In respect of Shipping bills listed in **Table C** above, the FOB Value declared indicates an undervaluation by them by an amount equal to the excess insurance premium amounts declared by them in the Shipping Bills. Thus, exporter appears to have out rightly mis-declared the actual transaction value at the time of export.

Thus, the declared FOB value in respect of all these shipments appear to not reflect the correct transaction value of the goods for delivery of the export goods at the time and place of exportation (i.e. on board the foreign going vessel after clearance from the customs authorities at the port of export).

iv. The FOB value of export goods in all these cases appear to be mis-declared by M/s Pagariya Exports Pvt. Ltd. to the Customs authorities in the shipping bills filed by them which was supported by their custom purpose export invoices, resulting in suppression and mis-declaration of actual transaction value at the time of assessment of the export goods. As such, the value of export goods in respect of all these

Shipping Bills reflect mis-representation vis-a-vis the actual transaction value, thereby indicating evasion of export duty leviable on rice shipments exported by them;

v. The value of export goods pertaining to each of these Shipping Bills appear liable to be rejected and reassessed as per their actual transaction value as ascertained during investigation, by taking into account the amount which was excluded from the declared value at the time of assessment, as brought out in above paras;

vi. The balance amount not included in the declared FOB Value and wilfully suppressed by not declaring to Customs with an intention to misrepresent the transaction value of the export goods, appears liable to be assessed to duty at the applicable rate as detailed in **Annexure –I, Annexure -II & Annexure –III** of this Investigation Report and the same is recoverable along with interest at applicable rate;

vii. Therefore, the investigation has revealed that the act of undervaluation and mis-declaration of actual transaction value in respect of Shipping Bills listed in Tables **A, B & C** by M/s Pagariya Exports Pvt. Ltd. appears to have rendered the export goods liable to confiscation under the provisions of Section 113 (i) of the Customs Act, 1962 and consequently M/s. Pagariya Exports Pvt. Ltd. appears to have rendered themselves liable to a Penalty under the provisions of Section 114A and Section 114AA of the Customs Act, 1962;

viii. Sh. Neel Umesh Pagariya, Sh. Umesh Parasmal Pagariya and Sh. Raj Umesh Pagariya, all Directors of M/s Pagariya Exports Pvt. Ltd., appear to be the persons who knowingly or intentionally either made, signed and used or caused to be made, signed and used, the custom purpose export invoices, exporter and banking purpose export invoices and Shipping Bills for export of rice by M/s Pagariya Exports Pvt. Ltd., which were incorrect as regards to the value of export goods for payment of export duty. With respect to the goods covered under Shipping Bills listed in Tables **A, B & C** above, the declarations made by M/s Pagariya Exports Pvt. Ltd. appear to be false and incorrect in material particulars relating to the value of the impugned goods. The contracts with the buyer for sale and export of rice as well as the export documents submitted to Customs were finalized/signed in the overall supervision of Sh. Neel Umesh Pagariya, Sh. Umesh Parasmal Pagariya and Sh. Raj Umesh Pagariya, who were handling the day to day business of the export firm.

ix. Sh. Sudeep Madhusudan Kothari, Consultant (Accounts and Finance) of M/s Pagariya Exports Pvt. Ltd. was also aware of these acts and omissions conducted by their export firm in export of rice shipments. This fact has been admitted by Sh. Sudeep Madhusudan Kothari and Sh. Neel Umesh Pagariya in their respective statement recorded u/s 108 of the Customs Act, 1962. In view of this, it appears that Sh. Neel Umesh Pagariya, Sh. Umesh Parasmal Pagariya and Sh. Raj Umesh Pagariya, were the key persons who had orchestrated the entire scheme of mis-declaration of value of the export goods, with an intention to evade customs (export) duty. Sh. Neel Umesh Pagariya, Sh. Umesh Parasmal Pagariya and Sh. Raj Umesh Pagariya, therefore appear responsible for wilful acts of mis-statement and suppression of facts in respect of export of rice by M/s Pagariya Exports Pvt. Ltd. Sh. Sudeep Madhusudan Kothari, Consultant (Accounts and Finance) of M/s Pagariya Exports Pvt. Ltd. also aware of the modus adopted by their export firm, and appear to have aided these Directors in the said act of wilful mis-statement and suppression of facts. Therefore, the acts of Sh. Neel Umesh Pagariya, Mr. Umesh Parasmal Pagariya, Mr. Raj Umesh Pagariya and Sh. Sudeep Madhusudan Kothari which indicate under-valuation and mis-declaration of actual transaction value in respect of Shipping Bills filed by M/s Pagariya Exports Pvt. Ltd. have rendered the export goods liable to confiscation under the provisions of Section 113 (i) of the Customs Act, 1962. As such, Sh. Neel Umesh Pagariya, Mr. Umesh Parasmal Pagariya, Mr. Raj Umesh Pagariya and Sh. Sudeep Madhusudan Kothari have rendered themselves liable to penal action under the provisions of Section 114 (ii) and 114AA of the Customs Act, 1962;

18. CBIC vide Notification No. 28/2022-Customs (N.T.) dated 31.03.2022 had stipulated that in cases of multiple jurisdictions as referred in Section 110AA of the Customs Act, the report in writing, after causing the inquiry, investigation or audit as the case may be, shall be transferred to officers described in column (3) of the said Notification along with the relevant documents. For cases involving short levy, non-levy, short payment or non-payment of duty, as provided in Section 110AA (a) (ii), the functions of the proper officer for exercise of powers under Section 28 of the Customs Act, 1962 have been assigned to the jurisdictional Pr. Commissioner/ Commissioner of Customs in whose jurisdiction highest amount of duty is involved. Since, in the present case, exports have been made from eight (08) different ports, as mentioned in **Table G in para 15.4 above**, however the highest amount of differential export duty is in respect of Kandla Sea port (INIXY1). Hence, Kandla Sea port (having port code as 'INIXY1') being the port involving highest revenue, this Show Cause Notice is being made answerable to **the Principal Commissioner / Commissioner of Customs, Kandla, Custom House, Near Balaji Temple Kandla 370210** (having port code as 'INIXY1'), for the purpose of issuance as well as adjudication of Show Cause Notice under Section 110AA read with Notification No. 28/2022-Customs (N.T) dated 31.03.2022.

19. Show Cause Notice:

19.1 Now therefore, **M/s Pagariya Exports Pvt. Ltd.** having its registered office at Plot No. 19, House No.-1256/U1, Great Nag Road, Rambagh, Darshan Colony, Nandanvan, Nagpur-440018; bearing Importer Exporter Code (IEC) No. ABECS8262N **,** are hereby called upon to show cause within 30(thirty) days of receipt of this Notice, in writing, to the Adjudicating Authority i.e., Commissioner of Customs Kandla, Custom House, Near Balaji Temple Kandla 370210 ('INIXY') as to why—

i. The declared assessable/transaction value of **Rs. 3,87,84,48,383/-** in respect of **339** shipments of rice exported vide Shipping Bills detailed in **'Annexures-I, II & III'**, filed by them at eight different ports, should not be rejected in terms of Rule 8 of the Customs Valuation (Determination of Value of Export Goods) Rules, 2007, read with Rule 3 (1) ibid and Section 14 (1) of the Customs Act, 1962;

ii. The actual assessable/transaction value in respect of Shipping Bills detailed in **'Annexures-I, II & III'**, filed by them at eight different ports, should not be re-determined at **Rs.466,41,75,011/-** under the provisions of Section 14 (1) of the Customs Act, 1962, read with Rule 3 (1) of the Customs Valuation (Determination of Value of Export Goods) Rules, 2007, by taking into account undeclared export duty reimbursement amounts and excess freight & insurance amounts which were claimed/recovered by them from the overseas buyer of the goods as discussed in **Para 8 & 15** of this Investigation Report;

iii. The differential (export) duty amounting to **Rs**. **15,71,45,326 /-** payable, as calculated and shown in '**Annexures-I, II & III'** to this Investigation Report, in respect of Shipping Bill filed by them at eight different ports, should not be demanded and recovered from them, by invoking the extended period of limitation available under the provisions of Section 28 (4) of the Customs Act, 1962;

iv. The interest on the afore-said total differential duty amount of **Rs**. **15,71,45,326 /-** should not be demanded and recovered from them under the provisions of Section 28AA of the Customs Act, 1962;

v. The deposit of **Rs.15,48,04,625/-** made during investigation should not be appropriated and adjusted towards the overall differential duty liability/interest/fine/penalty or any other amount payable.

vi. The shipments of rice exported vide Shipping Bills detailed in **'Annexures-I, II & III'** to this Notice having re-determined assessable value of **Rs. 466,41,75,011/-,** should not be held liable to confiscation under the provisions of Section 113 (i) of the Customs Act, 1962 read with Section 124 ibid;

vii. Penalty under the provisions of section 114 A and Section 114 AA of Customs Act, 1962, read with Section 124 ibid, should not be imposed upon them.

19.2 Now therefore, **Sh. Neel Umesh Pagariya, Mr. Umesh Parasmal Pagariya and Mr. Raj Umesh Pagariya**, **all Directors** of M/s Pagariya Exports Pvt. Ltd., Plot No. 19, House No.-1256/U1, Great Nag Road, Rambagh, Darshan Colony, Nandanvan, Nagpur-440018; and all residents of Pagariya Lake Estate, House No. 3, Khasara No. 37, Baradwari Kapsi Khurd Nagpur (Rural), Nagpur – 440035**, and Sh. Sudeep Madhusudan Kothari, Consultant (Accounts and Finance)** of M/s Pagariya Exports Pvt. Ltd. Plot No. 19, House No.-1256/U1, Great Nag Road, Rambagh, Darshan Colony, Nandanvan, Nagpur-440018; **Resident of:** 110/C, Dev Krupa Society, Vardhman Nagar, Nagpur – 440008, are hereby called upon to show cause within 30 (thirty) days of receipt of this Notice, in writing, to the Adjudicating Authority i.e., **Principal Commissioner / Commissioner of Customs Kandla, Custom House, Near Balaji Temple Kandla 370210 ('INIXY1'),** as to why-

(i) Penalty under the provisions of section 114 (ii) and Section 114AA of the Customs Act, 1962, read with Section 124 ibid, should not be imposed upon them for their acts and omissions in evasion of Customs Duty amounting to **Rs.15,71,45,326/-** on export of rice through their export firm.

20. The above noticees are further called upon to intimate in writing as to whether they wish to be heard in person by the adjudicating authority before the case is adjudicated within 30 days from the date of receipt of this show cause notice. If no reply of this notice is received and / or they fail to appear before the adjudicating authority, when the case is posted for hearing, the case will be decided ex-parte on the basis of the evidences available on record without any further notice to them.

21. The original copies of the relied upon documents, if required, can be inspected by the noticee / noticees in the office of the Principal Director General, Directorate of Revenue Intelligence, Plot No. 11-B, Institutional Area Vasant Kunj, New Delhi-110070, during office hours on any working day with prior appointment.

22. This Show Cause Notice is issued without prejudice to any other action that may be taken against the noticee / noticees mentioned hereinabove or any other persons / firms connected with the case under the Customs Act, 1962 or any other law for the time being in force.

23. Documents relied upon are detailed in **Annexure - 'R'** attached to this Show Cause Notice.

24. The Non-RUDs may also be collected, if required, by the notice/ noticees from the office of the Principal Director General, Directorate of Revenue Intelligence, Plot No. 11-B, Institutional Area Vasant Kunj, New Delhi-110070, during office hours on any working day with prior appointment within 30 days of receipt of this notice.

25. The department also reserves its right to amend, modify or supplement this notice at any time prior to the adjudication of the case.

Digitally signed by
Dinesh Singh
Date: 01-07-2026
11:37:35

(Dinesh Singh)
Commissioner of Customs
Custom House, Kandla

F. No. GEN/ADJ/COMM/365/2026-Adjn-O/o Commr-Cus-Kandla
DIN-20260671ML0000818884

To,

1. M/s Pagariya Exports Pvt. Ltd., Plot No. 19, House No.-1256/U1, Great Nag Road, Rambagh, Darshan Colony, Nandanvan, Nagpur-440018; neel@pagariyagroup.com

2. Sh. Neel Umesh Pagariya, Director of M/s Pagariya Exports Pvt. Ltd., Plot No. 19, House No.-1256/U1, Great Nag Road, Rambagh, Darshan Colony, Nandanvan, Nagpur-440018; and **R/o:** Pagariya Lake Estate, House No. 3, Khasara No. 37, Baradwari Kapsi Khurd Nagpur (Rural), Nagpur – 440035 pagariyaneel@gmail.com
3. Sh. Umesh Parasmal Pagariya, Director of M/s Pagariya Exports Pvt. Ltd., Plot No. 19, House No.-1256/U1, Great Nag Road, Rambagh, Darshan Colony, Nandanvan, Nagpur-440018; and **R/o:** Pagariya Lake Estate, House No. 3, Khasara No. 37, Baradwari Kapsi Khurd Nagpur (Rural), Nagpur – 440035 umesh@pagariyagroup.com
4. Sh. Raj Umesh Pagariya, Director of M/s Pagariya Exports Pvt. Ltd., Plot No. 19, House No.-1256/U1, Great Nag Road, Rambagh, Darshan Colony, Nandanvan, Nagpur-440018; and **R/o:** Pagariya Lake Estate, House No. 3, Khasara No. 37, Baradwari Kapsi Khurd Nagpur (Rural), Nagpur – 440035 raj@pagariyagroup.com finance@pagariyaexports.in
5. Sh. Sudeep Madhusudan Kothari, Consultant (Accounts and Finance), M/s Pagariya Exports Pvt. Ltd., Plot No. 19, House No.-1256/U1, Great Nag Road, Rambagh,

Darshan Colony, Nandanvan, Nagpur-440018; and **R/o:** 110/C, Dev Krupa Society, Vardhman Nagar, Nagpur – 440008. casudeepkothari@gmail.com

Copy for necessary action to: -

1. The Principal Commissioner / Commissioner of Customs (Preventive), Vijaywada, 55-17-3, C-14, II Floor, Road No. 2, Industrial Estate, Auto Nagar, Vijayawada-520007, ('INKRI1') (Email ID: commr.cpc-ap@nic.in)
2. The Principal Commissioner / Commissioner of Customs, Visakhapatnam, Custom House, Port Area, Visakhapatnam – 530035 (INVTZ1) (Email ID: prcomm1-cusvzg@gov.in)
3. The Principal Commissioner / Commissioner of Customs Nhava Sheva-II, Jawaharlal Nehru Customs House, Nhava Sheva, Taluka- Uran, Dist.-Raigad, Maharashtra-400707 ('INNSA1') (Email ID: commr-ns2@gov.in)
4. The Commissioner of Customs (Airport & ACC) 15/1, Strand Road,Customs House, Kolkata-700001, (INCCU1) (Email ID: prcommr-airport-cuskol@gov.in)
5. The Principal Commissioner of Customs, Mundra, 5B, Port User Building, Mundra Port, Mundra, Kutch, Gujarat-370421 (INMUN1) (Email ID: commr-cusmundra@nic.in)
6. The Commissioner of Customs, Customs Commissionerate, GST Bhavan, Telangkhedi Road, Civil Lines, Nagpur - 440001 (INKPK6 and INBOK6) (Email: nagpurcustomsadjudication@gmail.com, commr-customsnagpur@gov.in, custtech2016@gmail.com)
7. The Director General, Central Economic Intelligence Bureau, 6th Floor, B-Wing, Janpath Bhawan, Janpath, New Delhi-110001

Annexure-R to the SCN F. No. GEN/ADJ/COMM/365/2026-Adjn-O/o Commr-Cus-Kandla issued to M/s Pagariya Exports Pvt. Ltd. & Others.

S. No.	RUD No.	Details / Description of the Documents
1.	RUD-01	Email dated 25.07.2024 received from M/s Pagariya Exports Pvt. Ltd.
2.	RUD-02	Email dated 24.08.2024 received from M/s Pagariya Exports Pvt. Ltd.
3.	RUD-03	Email dated 16.04.2026 received from M/s Pagariya Exports Pvt. Ltd.
4.	RUD-04	Email dated 24.04.2026 received from M/s Pagariya Exports Pvt. Ltd.
5.	RUD-05	Email dated 02-06-2026 received from M/s Pagariya Exports Pvt. Ltd.
6.	RUD-06	Invoices from e-sanchit which were submitted to customs at the time of export by M/s Pagariya Exports Pvt. Ltd.
7.	RUD-07	Email dated 07.05.2026 received from M/s Pagariya Exports Pvt. Ltd.
8.	RUD-08	Nagpur SCN dated 31.07.2025 issued by Nagpur Customs to M/s Pagariya Exports Pvt. Ltd.
9.	RUD-09	Statement dated 05-06-2026 of Neel Pagariya - Pagariya Exports Pvt. Ltd. recorded under Sec. 108 of the Customs Act, 1962
10.	RUD-10	Statement dated 05-06-2026 of Sudeep Madhusudan Kothari Consultant Pagariya Exports Pvt. Ltd. recorded under Sec. 108 of the Customs Act, 1962
11.	RUD-11	Shipping Bill No. 5871631 dated 07-12-2023
12.	RUD-12	Shipping Bill no. 4610612 dated 03-10-2022
13.	RUD-13	RBI Accounting Purpose code
14.	RUD-14	Incoterms 2020

Note: Please download the RUDs using the following link:

Google drive Link 1: https://drive.google.com/file/d/1CnwUFURVacg2gJHnGx_rXpmA_LAmMsCU/view?usp=sharing