



Ref.: SEC/224/2026-27

April 28, 2026

The Secretary, Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001.
Maharashtra, India.
Scrip Code: 500470

The Manager, Listing Department
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor, Plot No. C/1,
G Block, Bandra-Kurla Complex, Bandra (E),
Mumbai - 400 051.
Maharashtra, India.
Symbol: TATASTEEL

Dear Madam, Sirs,

Sub: Disclosure under Regulations 30 and 51 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

This has reference to our disclosure dated February 4, 2026 regarding material litigations relating to the Sukinda Chromite Block of Tata Steel Limited ('Company').

Background:

a) Writ Petition 1: Writ Petition (Civil) No. 22431 of 2025 before the Hon'ble High Court of Orissa at Cuttack

On July 3, 2025, the Company received a Demand Letter issued by the Office of Deputy Director of Mines, Jajpur ('Demand Letter 1'), raising a demand of ₹1902,72,53,760/-, in connection with revised assessment of shortfall in dispatch of minerals from the Company's Sukinda Chromite Block, for the 4th year in terms of Mine Development and Production Agreement (i.e., July 23, 2023 through July 22, 2024) in alleged violation of Rule 12-A of the Minerals (Other than Atomic and Hydro Carbons Energy Minerals) Concession Rules, 2016 ('MCR 2016'), and consequent appropriation of performance security. On August 8, 2025 the Company had filed Writ Petition (Civil) No. 22431 of 2025 before the Hon'ble High Court of Orissa at Cuttack ('Hon'ble High Court') inter alia seeking quashing of the Demand Letter 1.

On August 14, 2025, the Hon'ble High Court heard & tagged the petition with similar cases and restrained the opposite parties/authorities from taking any coercive steps until the next date of hearing this matter.

TATA STEEL LIMITED

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Thereafter, the matter(s) were heard by the Hon'ble High Court on several occasions and the interim order passed by the Hon'ble High Court on August 14, 2025 was extended on each of the occasions when the matter(s) were heard and finally on February 2, 2026, when the matter was reserved for judgement.

b) Writ Petition 2: Writ Petition (Civil) No. 31035 of 2025 before the Hon'ble High Court of Orissa at Cuttack

On October 3, 2025, the Company received another Demand Letter issued by the Office of Deputy Director of Mines, Jajpur ('**Demand Letter 2**'), raising a demand of ₹2410,89,66,881/-, in connection with assessment of shortfall in dispatch of Chrome Ore from the Company's Sukinda Chromite Block, for the 5th year in terms of Mine Development and Production Agreement (i.e., July 23, 2024 through July 22, 2025) in alleged violation of Rule 12A of the MCR 2016 and consequent appropriation of performance security. On October 29, 2025, the Company filed Writ Petition (Civil) No. 31035 of 2025 before the Hon'ble High Court inter alia seeking quashing of the aforementioned Demand Letter 2.

On November 21, 2025, the Hon'ble High Court heard & tagged the petition with similar cases and restrained the opposite parties/authorities from taking any coercive steps until the next date of hearing this matter.

Thereafter, the matter(s) were heard by the Hon'ble High Court on several occasions and the interim order passed by the Hon'ble High Court on November 21, 2025 was extended on each of the occasions when the matter(s) were heard and finally on February 2, 2026, when the matter was reserved for Judgement.

Latest Update:

On April 20, 2026, the Hon'ble High Court pronounced the Judgement for both the Writ Petition 1 and Writ Petition 2. The Company has on April 27, 2026 received the Judgement dated April 20, 2026 from the Hon'ble High Court in relation to both the Writ Petition 1 and Writ Petition 2.

The Hon'ble High Court has disposed of the Writ Petitions in terms of the conclusions and directions as below (verbatim from the Judgement):

- 1. There is no incongruity in exercising the legislative powers by inserting Rule 12A(1) by virtue of an amendment dated 20.03.2020 and, therefore, cannot be said to be constitutionally invalid or ultra vires to the spirit and the purport of the parent Act;*
- 2. The subsequent amendment dated 10.06.2021 which came into effect on and from 1st July, 2021 by introducing sub-rules (1A), (1B) and (1C) of Rule 12A of the said Rules are relatable to and the consequences provided therein are restricted to the eventualities contemplated under Rule 12A(1) and, therefore, cannot be said to be ultra vires offending the core fabric of the parent statute;*



- 3. Rule 12A(1) was brought by way of an amendment dated 20th March, 2020 makes imperative in relation to adherence of the production and/or extraction of mineral so as to ensure 80% dispatch of the average of the annual production of two preceding years on pro rata basis and any default in achieving the stipulated production level attracts the consequences provided under MDPA only. The penal consequences for non-adherence of minimum dispatch obligation is introduced by inserting subrules (1A), (1B) and (1C) with effect from 01.07.2021, which cannot be applied retrospectively;*
- 4. Sub-rule (1C) of Rule 12A postulates the penal provisions contemplated under sub-rules (1A) and (1B) with regard to short fall in the dispatch applies prospectively, i.e. 01.07.2021 or after a period of one year from the date of the mining lease, whichever is earlier, provided the mining lease is executed before the commencement of the amendment Act 2021;*
- 5. The Mining Plan cannot be said to be a mere technical document, but the annual production shall be strictly made in conformity therewith, which is seemingly envisaged in Rule 12A(2) of the said Rules. In the event the Mining Plan provides annual production below the average annual production of the previous lessee or the MDPA, it could prevail in view of the exposition of law in Common Cause case;*
- 6. The Regulatory Authority tracing its source from the statutory provisions as discussed hereinabove, approves the Mining Plan strictly in conformity with the provisions contained under MMDR Act, 1957, MCR, 2016 and MCDR, 2017 to ensure the sustainable and scientific mining so that the resources are fully exploited during the period of lease and in the event of any default, the consequences as provided in MDPA can only be resorted to;*
- 7. The proviso introduced to Rule 12A(2), which came into effect from 1st July, 2021 pertaining to the ensurance of dispatch of 80% of the annual production does not contemplate any penal consequences under sub-rules (1A) and (1B) of Rule 12A of MCR, 2016 and, therefore, cannot be construed as mandatory nor can be applied to have been impliedly incorporated in the MDPA as a consequential effect;*
- 8. The Mining Plan being a statutory requirement operates throughout the currency of the lease deed until its closure as per the final mine closure plan, as approved by the competent authority from time to time, is sacrosanct under the various provisions of the MMDR Act, 1957, MCR, 2016 and MCDR, 2017. There is no prohibition/restriction while approving the Mining Plan for production below the minimum production obligation contemplated under the MDPA and in case of any inconsistency between the Mining Plan and MDPA, the Mining Plan shall prevail;*
- 9. All the impugned demand notices issued by the State Government to the extent they are contrary to the above conclusions, shall stand quashed. The State Government and other Authorities are directed to take steps in light of the above conclusions and directions.*



Based on the conclusions and directions passed by the Hon'ble High Court, the Company believes that the Demand Letter 1 dated July 3, 2025 and Demand Letter 2 dated October 3, 2025 issued by the Office of Deputy Director of Mines, Jajpur stands quashed to the extent they are contrary to the conclusions and directions passed by the Hon'ble High Court.

This disclosure is being made by the Company in compliance with Regulations 30 and 51 read with Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This is for your information and records.

Thanking you.
Yours faithfully,
Tata Steel Limited

Parvatheesam Kanchinadham
Company Secretary and Chief Legal Officer