

OIL INDIA LIMITED
(A Government of India Enterprise)
P.O. Duliajan, Pin – 786602
Dist.-Dibrugarh, Assam

CORRIGENDUM-1 dated 14.10.2026

Tender No. GEM/2026/B/8091932 dated 28.09.2026

This **Corrigendum No. 1 dated 14.10.2026** to **GEM/2025/B/8091932 dated 28.09.2026** for “Hiring services for Appointment of Direct Tax Consultant for all spheres of Oil India Limited” is issued to amend the following:

Sl. No	Reference	Existing Clause	Amended/New Clause
1.	SOW Clause No Part A (xiii)	Assistance to OIL in all activities in relation to appeal proceeding before the Commissioner of Income Tax (Appeals) ('CIT(A)') for Preparation of detail submission, Preparation of synopsis and additional submissions / benchmarks, Research on case laws on issues involved, Preparation and review of legal paperbook/case law compendium till the disposal of the Appeal for both Transfer pricing Matter and Corporate Tax Matter.	Assistance to OIL in all activities in relation to appeal proceeding before the Commissioner of Income Tax (Appeals) ('CIT(A)') for Preparation of detail submission, Preparation of synopsis and additional submissions / benchmarks, Research on case laws on issues involved, Preparation and review of legal paperbook/case law compendium till the disposal of the Appeal for both Transfer pricing Matter and Corporate Tax Matter. <i>In the event that the Entity does not avail of CIT(A)-related services for any particular Financial Year (as specified under Item No. (xiii) of Part A of the SOW), the Dispute Resolution Panel (DRP) shall be considered equivalent to CIT(A) for that Financial Year. Accordingly, the relevant line items under Item No. (xiii) of Part A of the SOW pertaining to CIT(A)-related services shall also</i>

			<i>apply to DRP proceedings for the respective Financial Year.</i>
2	ITB Clause No. 33.4	OIL has appointed Shri Radhakrishna Kini A, IPS (Retd.), Ex- Secretary (Security), Cabinet Secretariat, New Delhi, Dr. Ved Prakash, ITS (Retd.) Ex-Additional Director General Foreign Trade, and Shri Ajit Mohan Sharan, IAS (Retd.), as Independent External Monitors (IEM) for a period of 03 (Three) years to oversee implementation of Integrity Pact in OIL. Bidders may contact the Independent External Monitors for any matter relating to the Integrity Pact at the following addresses: a. Shri Radhakrishna Kini A, IPS (Retd.), Ex-Secretary (Security), Cabinet Secretariat, New Delhi. Mob No.: 9971722727 E-mail: arvkini2004@yahoo.co.in & arvkini2004@gmail.com b. Dr. Ved Prakash, ITS (Retd.) Ex-Additional Director General Foreign Trade, Mob No.: <u>9810546996</u> E-mail: ved60prakash@gmail.com c. Shri Ajit Mohan Sharan, IAS (Retd.), Former Secretary, Ministry of Ayush, Govt. of India, Mob No.: 9810701876 E-mail: ams057@gmail.com	OIL has appointed Shri Radhakrishna Kini A, IPS (Retd.), Ex- Secretary (Security), Cabinet Secretariat, New Delhi, Dr. Ved Prakash, ITS (Retd.) Ex-Additional Director General Foreign Trade, and Shri Lt. Gen. Rakesh Kapoor (Retd.), as Independent External Monitors (IEM) for a period of 03 (Three) years to oversee implementation of Integrity Pact in OIL. Bidders may contact the Independent External Monitors for any matter relating to the Integrity Pact at the following addresses: a. Shri Radhakrishna Kini A, IPS (Retd.), Ex-Secretary (Security), Cabinet Secretariat, New Delhi. Mob No.: 9971722727 E-mail: arvkini2004@yahoo.co.in & arvkini2004@gmail.com b. Dr. Ved Prakash, ITS (Retd.) Ex-Additional Director General Foreign Trade, Mob No.: <u>9810546996</u> E-mail: ved60prakash@gmail.com c. Lt. Gen. Rakesh Kapoor (Retd.), A 601 Som Vihar, R K Puram, New Delhi - 110022 Mob No. 9599020807

			E-mail: rakeshkapoor65@gmail.com
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(i) Incorporation/amendment of the following Clauses in SOW and ITB of the subject tender:

(ii) Modified SOW is enclosed herewith as **ENCLOSURE-I**.

(iii) Extension of bid closing & opening dates & time:

- a) Extended Bid Closing Date & Time: 22.10.2026 [14:00 Hrs (IST)]
- b) Extended Bid Opening Date & Time: 23.10.2026 [14:00 Hrs (IST)]

(iv) All other terms and conditions of the Bid Document remain unchanged. Details can be viewed at www.oil-india.com.

Sd/-

SR. OFFICER – CONTRACTS (S)

SECTION-III
SCOPE OF WORK (SOW)

Description of Service: Hiring of services for Appointment of Direct Tax Consultant for all spheres of OIL India Limited.

Oil India Limited (OIL) intends to engage a direct tax consultant ('Consultant') having relevant experience in advising on various corporate domestic and international direct taxation matters especially pertaining to Oil and Gas Sector arising from time to time. The Consultant is required to provide consultancy services as per the scope of work given below:

A. Services of Regular Nature (PART-A):

- i. Preparation and review of Income Tax provisions, Minimum Alternate Tax ('MAT'), Corporate Income Tax Return of the company for each financial year, in strict compliance with the requirements of Income Computation and Disclosure Standards ('ICDS') which would include, inter alia, review of admissibility of various deductions / allowances, any special considerations / issues arising out of OIL's operations, computation and admissibility of double taxation credits, tax sparing credits and MAT credit etc., adequate disclosure with respect to item of Tax provisions by way of notes to computation/otherwise (refer & discuss in short applicable case law, circular and/or notification in the notes to computation), internal consistency with various disclosures / computation notes, treatment of Minimum Alternate Tax, if applicable and all other matters that may be relevant with respect to the filing of the Corporate Tax Return of OIL as per the Income Tax Act, 2025 (Erstwhile Income Tax Act, 1961) ('the Act') or any other law/notification/guidelines in force for the time being for income tax during the engagement period. The consultant should also take into account the tax implications of overseas investments as far as Company's Income Tax Computation and Income Tax Return is concerned.
- ii. Undertaking the year-end statutory Transfer Pricing study including identifying the transactions covered under transfer pricing legislation, functional and risk analysis, industry and market analysis, benchmarking and financial/ economic analysis, study / documentation to assist the Company in maintaining documentation required for compliance with statutory requirements, submit a Transfer Pricing Study Report on the same and issue an Accountant's Report (AR') in the prescribed format as per tax laws, setting forth prescribed particulars and information to be filed with the tax authorities starting from AY 2026-27 and Tax Year 2026-27.
- iii. Issue Accountant's Report in the prescribed form as per section 172 (Erstwhile Section 92E) of the Act and its e-filing as per requirement of the Act applicable at the time of issuing of it. However, bidder may arrange to issue Accountant's Report and e-file it from its eligible associates, if the bidder himself is not qualified to certify and e-file the Accountant's Report. However, any information in such Accountant Report has to be clarified by the successful bidder to the satisfaction of the Accountant and

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OIL. Audit Report to be issued in soft copy (preferably scanned in pdf format) and hard copy - 3 sets and e-filing of such report to be done on or before the applicable due date.

- iv. Assistance in preparation and filing of Master File in the prescribed form as per section 171(4) of Income Tax Act, 2025(Erstwhile 92D (4) of Income Tax Act, 1961).
- v. Assistance in preparation and filing of country-by-country Report (CBC Report) in the prescribed form as per section 511(2) of Income Tax Act, 2025(Erstwhile 286(2) of Income Tax Act, 1961).
- vi. Review of quarterly computation of Advance Income Tax installments in strict compliance with the requirements of ICDS and suggestion for alteration of parameters for estimation of annual PBT and any improvement in the process.
- vii. In any financial year, if a Revised tax return is to be filed by OIL, the consultant to prepare and review such revised return in strict compliance with the requirements of ICDS, which would include, inter alia, the review of computation of tax, admissibility of various deductions / allowances, any special considerations / issues arising out of OIL operations, computation and admissibility of double taxation credits, tax sparing credits etc., adequate disclosure with respect to positions taken by OIL by way of notes to computation/ otherwise, internal consistency with various disclosures / computation notes, treatment of Minimum Alternate Tax, if applicable, and all other matters that may be relevant with respect to the filing of the Revised Corporate Tax Return of OIL.
- viii. Assistance to OIL in all activities (other than representation services covered in point XV to XVII below) in relation to completion of Assessment proceedings u/s 270/287 (Erstwhile 143/154) (or any successor provisions) of the Act during the engagement period including penalty proceedings, if any. This may include activities like drafting /filing of replies to notices for finalization of assessments, drafting/filing of submissions with the tax authorities regarding any penalty proceedings, preparation and filing of letter for keeping penalty proceedings in abeyance and application for stay of demand with required submissions etc.
- ix. Assistance/guidance to OIL in connection with Transfer Pricing Proceedings before TPO u/s 166(4) and 171(2) [Erstwhile 92CA (2) and 92D (3)]of the Act (or any successor provisions) including drafting /filing of replies to notices and representation before the TPO for finalization of assessments, drafting/filing of submissions with the TPO regarding any penalty proceedings including rectification applications, as applicable, and maintenance of any other information/ documentation, review of assessment orders, preparation and filing of application u/s 287 (Erstwhile u/s 154) and related proceedings before the TPO.
- x. Assistance to OIL in all activities in relation to appeal proceedings (other than representation services covered in point XV to XVII below) before the Commissioner

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of Income tax (Appeals) ('CIT(A)') on corporate tax matters which include preparation of appeal, statement of facts, grounds of appeal etc. during the engagement period.

- xi. Assistance to OIL in all activities in relation to appeal proceedings before the Commissioner of Income tax (Appeals) ('CIT(A)') on transfer pricing matters (other than representation services covered in point XV to XVII below) which will include preparation of appeal, statement of facts, grounds of appeal etc. during the engagement period.
- xii. Assistance to OIL in all activities in relation to appeal proceedings before the Income Tax Appellate Tribunal (ITAT) on Corporate Tax and Transfer pricing matters (other than representation services covered in point XV to XVII below) which will include Filing of Form 36, preparation of appeal, statement of facts, grounds of appeal etc. during the engagement period.
- xiii. Assistance to OIL in all activities in relation to appeal proceeding before the Commissioner of Income Tax (Appeals) ('CIT(A)') for Preparation of detail submission, Preparation of synopsis and additional submissions / benchmarks, Research on case laws on issues involved, Preparation and review of legal paperbook/case law compendium till the disposal of the Appeal for both Transfer pricing Matter and Corporate Tax Matter.

In the event that the Entity does not avail of CIT(A)-related services for any particular Financial Year (as specified under Item No. (xiii) of Part A of the SOW), the Dispute Resolution Panel (DRP) shall be considered equivalent to CIT(A) for that Financial Year. Accordingly, the relevant line items under Item No. (xiii) of Part A of the SOW pertaining to CIT(A)-related services shall also apply to DRP proceedings for the respective Financial Year.

- xiv. Assistance to OIL in all activities in relation to appeal proceeding before the Income Tax Appellate Tribunal ("ITAT") for Preparation of detail submission, Preparation of synopsis and additional submissions / benchmarks, Research on case laws on issues involved, Preparation and review of legal Paper book/case law compendium till the disposal of the Appeal for both Transfer pricing Matter and Corporate Tax Matter.
- xv. Effective Representation of the company (including submitting written representations, wherever required) before Assessing Officer/ TPO or CIT (Appeal) (through suitable counsels), where required.
- xvi. Effective Representation of the company (including submitting written representations, wherever required) before ITAT (through suitable counsels), where required.
- xvii. Adjournment / Non-effective Representation of the company before Assessing Officer/ TPO or CIT (Appeal) ITAT, covered in point no. XV and XVI above.

- xviii. Providing opinions on issues/queries raised for the implementation of the provisions of the Direct tax legislation applicable to OIL.

Note: Effective Hearing: A hearing in which either one or both the parties involved in a case are heard by the CIT(A)/ITAT. If the case is mentioned and adjourned or only directions are given, it would not constitute an effective hearing but will be termed as non-effective hearing.

Note: In relation to Points XV to XVII, the Consultant shall nominate one or more representatives for appearances before the AO, TPO, CIT(A), and ITAT in respect of Corporate Tax or Transfer Pricing matters or both. Representatives shall be from the Consultant's nominated Tax & Regulatory team and Transfer Pricing team.

B. Services on Call Out Basis (PART-B):

- i. Assisting OIL in assessing its tax positions and advising on various efficient options available, including as and when required, drafting applications for amendment of section 42 agreements with the central government etc.
- ii. Any other matter relating to Domestic and International Direct Tax, as may be required from time to time.

The team to be deployed for a specific assignment will be mutually decided between the bidder and the company. The time cost for each assignment is to be approved by the company's officer based on man-hours proposed by the bidder.

End of Section-III