

# Dear Member,

We are pleased to inform you that the Board of Directors of your Company ("the Board"), at their meeting held on Monday, May 8, 2023, have recommended final dividend of  $\gtrless$  2/- (i.e., 100%) per equity share having face value of  $\gtrless$  2/- each, for the financial year ended March 31, 2023.

The Record Date for determining the entitlement of the members to receive the final dividend for the financial year 2022-23, if approved by the members at the ensuing Annual General Meeting, is Friday, July 14, 2023, and the same has been notified to the Stock Exchanges on Monday, June 26, 2023.

# Deduction of Tax at Source ("TDS") at the time of Dividend payment

In terms of the provisions of the Income-tax Act, 1961 ("the Act") dividend paid or distributed by a Company shall be taxable in the hands of the Members. The Company shall, therefore, be required to deduct TDS at the time of payment of dividend at the applicable tax rates. The rate of TDS would depend upon the category and residential status of the Member.

As it is important for the Company to receive the relevant information from Members to determine the rate of tax deduction, the Members are requested to furnish relevant documentation in the prescribed manner on the portal of RTA on or before **Friday**, **July 14**, **2023** (06:00 p.m. IST). The applicable TDS rate for dividends and documents to be furnished by each category of Members is given in the "Annexure – TDS on Dividend", annexed hereto. The relevant documents can be uploaded on RTA portal at <u>https://web.linkintime.co.in/formsreg/submission-of-form-15g-15h.html</u>.

The information given in the said Annexure may not be exhaustive and the Members should evaluate on their own about the category for which they should furnish the documents. In absence of all the relevant documents, the Company shall determine TDS rate based on information available with the RTA (for shares held in physical form) and the DPs (for shares held in dematerialized form).

Please note that the duly completed & signed documents should be uploaded on the portal of the RTA on or before Friday, July 14, 2023 (06:00 p.m. IST). Ambiguous, incomplete and/or unsigned forms and declarations will not be considered by the Company. No communication on the tax determination/deduction shall be considered after the abovementioned date & time.

Members are also requested to update changes in their Residential Status, if any, with the RTA (for shares held in physical form) & DPs (for shares held in dematerialized form), along with the supporting documents.

If the Permanent Account Number ("PAN") is not as per the database of the Income-tax portal, it would be considered as an invalid PAN. Further, individual members are requested to link their Aadhaar number with the PAN.

In case TDS is deducted at a higher rate in the absence of receipt of the specified details/documents, you would still have the option of claiming refund of the excess tax paid at the time of filing your income tax return, only in case your valid PAN is registered with the RTA (for shares held in physical form) and the DPs (for shares held in dematerialized form). No claim shall lie against the Company for such taxes deducted.





Members should note that any document/form not uploaded on the portal will not be considered for the purpose of processing and shall be rejected, therefore, it should be uploaded on the portal only.

Members who have uploaded documents on the portal of the RTA should also forward the originals to the Company subsequently.

All queries with respect to TDS on dividend and submission of relevant documentation should be sent to tax@birlasoft.com.

Information with respect to the same is also available on the website of the Company at <a href="https://www.birlasoft.com/company/investors/policies-reports-filings#Shareholders-info">https://www.birlasoft.com/company/investors/policies-reports-filings#Shareholders-info</a>.

Members are requested to intimate changes, if any, pertaining to their name, postal address, telephone/mobile numbers, PAN, mandates, nominations and power of attorney to their respective DPs in case the shares are held by them in dematerialized form; and to the RTA of the Company at Link Intime India Private Limited (Attention - Sandip Pawar) Block No. 202, Akshay Complex, Off Dhole Patil Road, Near Ganesh Temple, Pune - 411001, Telephone: +91-20-26161629, E-mail: <u>pune@linkintime.co.in</u>, in case the shares are held by them in physical form.

Members are advised to update their PAN, KYC (Address, Email ID, Mobile Number, Bank Account Details, Specimen Signature, etc.) and Nomination details, as mandated by SEBI vide its circular no SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2023/37 dated March 16, 2023, before October 01, 2023, to avoid freezing of their folios:

- <u>Members holding shares in physical form</u>: to the Company's RTA Link Intime India Private Limited, in prescribed Form ISR -1 and other forms as per instructions mentioned in the form. The Company has already sent requisite communication to the members for furnishing these details. The formats can be downloaded from RTA's website <u>www.linkintime.co.in</u> > Resources > Downloads > KYC > Formats for KYC and such formats are also available on the Company's website at https://www.birlasoft.com/company/investors/policies-reports-filings#Shareholders-info.
- <u>Members holding shares in dematerialized form</u>: to their respective DPs as per the procedure prescribed by them.

### For Birlasoft Limited

## Sd/-Sneha Padve Company Secretary & Compliance Officer

**Disclaimer:** The information set out herein above and in Annexure is included for general information purposes only and does not constitute legal or tax advice. Since the tax consequences are dependent on facts and circumstances of each case, the investors are advised to consult their own tax consultant with respect to specific tax implications arising out of receipt of dividend. The member would be liable for all the adverse consequences (including penal consequences) if there is any misrepresentation of facts or furnishing of any inaccurate particulars/ documents.



# Annexure – TDS on Dividend

Companies paying dividend are required to withhold tax at the applicable tax rates (unless otherwise exempted, TDS rate is 10% for resident Members with valid PAN, 20% for resident Members without PAN or invalid PAN and rates prescribed under the Income-tax Act, 1961 ("IT Act") or Tax Treaty, read with Multilateral Instruments, if applicable, for non-resident Members). No withholding of tax is applicable if the dividend payable to resident individual Members is upto ₹ 5,000/- p.a.

Section 206AB has been introduced by the Finance Act, 2021, whereby TDS will be higher of the following:

- i. Twice the rate specified in the relevant provision of the IT Act; or
- ii. Twice the rate or rates in force; or
- iii. the rate of 5%;

in case a person has not filed his/her return of income for the assessment year relevant to the previous year immediately preceding the financial year in which tax is required to be deducted, for which the time limit for furnishing the return of income under sub-section (1) of section 139 has expired and the aggregate of tax deducted at source and tax collected at source in his/her case is ₹ 50,000/- or more in the said previous year. The status of filing of Return of Income by the Members would be verified from the functionality provided by the Indian Income Tax authorities. The Company would solely rely on the information available on the Income Tax portal in this regard.

Further, as per Section 139AA of the IT Act, every person who has been allotted a PAN and who is eligible to obtain Aadhaar, shall be required to link the PAN with Aadhaar. In case of failure to comply to this, the PAN allotted shall be deemed to be invalid/inoperative and tax shall be deducted at the rate of 20% as per the provisions of Section 206AA of the IT Act. The Company will be using functionality of the Income-tax department for the above purpose. Provisions will be effective from July 1, 2023. Members may visit <a href="https://www.incometax.gov.in/iec/foportal/">https://www.incometax.gov.in/iec/foportal/</a> for FAQs issued by Government on PAN and Aadhar linking.

In order to provide exemption from TDS or apply lower rate of TDS or consider benefit of relevant Double Taxation Avoidance Agreement ("DTAA") with India as may be applicable, the documents prescribed for each category of Member (as per the eligibility) must be uploaded on the portal of RTA at https://web.linkintime.co.in/formsreg/submission-of-form-15g-15h.html. The format of available relevant documents is the website of the Company on at https://www.birlasoft.com/company/investors/policies-reports-filings#Shareholders-info. If the documents are found in accordance with the provisions of the IT Act the same shall be considered while deducting the taxes.

If the dividend income is assessable to tax in the hands of a person other than the registered Member as on the Record Date, the registered Member is required to furnish a declaration to the Company containing the name, address, PAN, beneficiary account no. (16 digits), number of shares of the person to whom TDS credit is to be given, tax residential status of the beneficiary and reason for giving credit to such person on or before Friday, July 14, 2023 (06:00 p.m. IST). Details or information received after this date will not be considered.





To summarize, dividend will be paid after deducting the tax at source as under:

## For Resident Members:

Particulars	Applicable Rate	Documents required (if any)			
Valid PAN updated with the Depository Participant in case shares are held in dematerialized form; or Registrar and Transfer Agent ('RTA') in case shares are held in physical form and no exemption sought by Member	10%	N.A.			
An Individual having dividend income more than ₹ 5000 and furnishing Form 15G/15H	NIL	<ul> <li>a) Copy of PAN card</li> <li>b) Declaration in Form No. 15G (applicable to an individual who is less than 60 years) / Form 15H (applicable to an Individual who is 60 years and above), fulfilling prescribed conditions.</li> </ul>			
Availability of lower/nil tax deduction certificate issued by Income Tax Department u/s 197 of the IT Act	Rate specified in Lower tax withholding certificate obtained from Income Tax Department	<ul> <li>a) Copy of PAN card</li> <li>b) Copy of lower tax withholding certificate obtained from Income Tax Department</li> </ul>			
No/Invalid PAN with the Depository Participant in case shares are held in dematerialized form; or RTA in case shares are held in physical form and no exemption sought by Member	20%	N.A.			
An Insurance Company as specified under Section 194 of the IT Act	NIL	<ul> <li>a) Copy of registration certification issued by the IRDAI;</li> <li>b) Self-declaration that the insurance company is beneficial owner of the shares held; and</li> <li>c) Copy of PAN Card.</li> </ul>			

Mutual Fund specified under clause (23D) of Section 10 of the IT Act	NIL	<ul> <li>a) Copy of relevant registration documents;</li> <li>b) Self-declaration that the mutual fund is governed by the provisions of Section 10 (23D) of the IT Act; and</li> <li>c) Copy of PAN Card.</li> </ul>
Alternative Investment Fund (AIF) established in India	NIL	<ul> <li>a) Copy of registration documents;</li> <li>b) Self-declaration that its income is exempt under Section 10 (23FBA) of the IT Act and AIF is established as Category I or Category II AIF under the SEBI Regulations; and</li> <li>c) Copy of PAN Card.</li> </ul>

# For Non-Resident Members:

Particulars		Applicable Rate	Documents required (if any)
a. Foreign Institutio Investors Foreign Portfolio Investors (FPIs)	s (FIIs)/	20% (plus applicable surcharge and cess) (subject to applicable tax treaty)	<ul> <li>b) Copy of Tax Residency certificate issued by revenue authority of country of residence of Member for the financial year 2023 and financial year 2024 (covering the period from April 1, 2023 to March 31, 2024)</li> <li>c) Members who have PAN and propose to claim</li> </ul>
b. Other Residen Member			<ul> <li>treaty benefit need to mandatorily file the Form 10F online at the link https://eportal.incometax.gov.in/ with effect from April 1, 2023 to avail the benefit of DTAA.</li> <li>d) Members who are not having PAN in India or who are not required to obtain PAN in India are exempted from mandatory electronic filing of Form 10F, however they are required to submit the manual Form 10F which should be duly signed.</li> <li>e) Declaration regarding Tax residency and Beneficial ownership of shares; Self-declaration for not having Permanent Establishment in India in accordance with the applicable Tax Treaty; [on Member's letterhead]</li> <li>f) Any other documents as prescribed under the IT Act for lower withholding of taxes, if applicable; and</li> </ul>



<ul> <li>g) In case, Member is resident of Singapore, documentary evidence of satisfaction of Article 24 of India-Singapore DTAA.</li> </ul>
The Company is not obligated to apply the beneficial DTAA rates at the time of tax deduction/withholding on dividend amounts. Application of beneficial DTAA rate shall depend upon the completeness and satisfactory review by the Company, of the documents submitted by the Members.

## INCOME-TAX RULES, 1962

### FORM NO. 15G

### [See section 197A(1), 197A(1A) and rule 29C]

# Declaration under section 197A(1) and section 197A(1A) to be made by an individual or a person (not being a company or firm) claiming certain incomes without deduction of tax

#### PART I

1. Name of Assessee (Declarant)			2. PAN of the Assessee <sup>1</sup>							
3. Status <sup>2</sup> 4. Previous year(P.Y.) <sup>3</sup> (for which declaration is being m			5. Residential Status <sup>4</sup>			atus <sup>4</sup>				
6. Flat/Door/Block No		7. Na	me of Pro	emises	8. Road/Street/Lane		9.Ar	ea/Locality		
10. Town/City/District	;	11. S	tate		12.	PIN		13. E	13. Email	
14. Telephone No. (with Code) and Mobile No.	h STD		15 (a) Whether asses Income-tax Act, 1961 (b) If yes, latest asses						No	
16. Estimated income for which this declaration is made			ion	17. Estimated total income of the P.Y. in which income mentioned in column 16 to be included <sup>6</sup>						
18. Details of Form No	. 15G o	other th	han this fo	orm filed duri	ng the	previous year	, if any <sup>7</sup>			
Total No. of Form No. 15G filed Aggreg			Aggrega	ate amount of income for which Form No.15G filed			Io.15G filed			
19. Details of income for which the declaration is filed										
Sl.         Identification number of relevant No.         Nature		Nature of inc	ome	Section und is deductibl		ix Ai	mount of income			

.....

Signature of the Declarant<sup>9</sup>

### $Declaration/Verification^{10}$

Place:	 	 	 
Date:	 	 	 

.....

Signature of the Declarant<sup>9</sup>

 Substituted by IT (Fourteenth Amdt.) Rules 2015, w.e.f. 1-10-2015. Earlier Form No. 15G was inserted by the IT (Fifth Amdt.) Rules, 1982, w.e.f. 21-6-1982 and later on amended by the IT (Fifth Amdt.) Rules, 1989, w.r.e.f. 1-4-1988, IT (Fourteenth Amdt.) Rules, 1990, w.e.f. 20-11-1990 and IT (Twelfth Amdt.) Rules, 2002, w.e.f. 21-6-2002 and substituted by the IT (Eighth Amdt.) Rules, 2003, w.e.f. 9-6-2003 and IT (Second Amdt.) Rules, 2013, w.e.f. 19-2-2013.

#### PART II

### [To be filled by the person responsible for paying the income referred to in column 16 of Part I]

1. Name of the person responsible for paying			2. Unique Identification No. <sup>11</sup>		
3. PAN of the person responsible for paying	4. Complete Address		5. TAN of the person responsible for paying		
6. Email	7. Telephone No. (with S	STD Cod	de) and Mobile No. 8. Amount of income		
9. Date on which Declaration is received (DD/MM/YYYY)			te on which the inco IM/YYYY)	ome has been paid/credited	
		I			

Place:	
Date:	Signature of the person responsible for paying
	the income referred to in column 16 of Part I

\*Delete whichever is not applicable.

<sup>1</sup>As per provisions of section 206AA(2), the declaration under section 197A(1) or 197A(1A) shall be invalid if the declarant fails to furnish his valid Permanent Account Number (PAN).

 $^2 Declaration can be furnished by an individual under section 197A(1) and a person (other than a company or a firm) under section 197A(1A).$ 

<sup>3</sup>The financial year to which the income pertains.

<sup>4</sup>Please mention the residential status as per the provisions of section 6 of the Income-tax Act, 1961.

<sup>5</sup>Please mention "Yes" if assessed to tax under the provisions of Income-tax Act, 1961 for any of the assessment year out of six assessment years preceding the year in which the declaration is filed.

<sup>6</sup>Please mention the amount of estimated total income of the previous year for which the declaration is filed including the amount of income for which this declaration is made.

<sup>7</sup>In case any declaration(s) in Form No. 15G is filed before filing this declaration during the previous year, mention the total number of such Form No. 15G filed along with the aggregate amount of income for which said declaration(s) have been filed.

<sup>8</sup>Mention the distinctive number of shares, account number of term deposit, recurring deposit, National Savings Schemes, life insurance policy number, employee code, etc.

Indicate the capacity in which the declaration is furnished on behalf of a HUF, AOP, etc.

<sup>10</sup>Before signing the declaration/verification, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under section 277 of the Income-tax Act, 1961 and on conviction be punishable-

- (*i*) in a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine;
- (*ii*) in any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine.

<sup>11</sup>The person responsible for paying the income referred to in column 16 of Part I shall allot a unique identification number to all the Form No. 15G received by him during a quarter of the financial year and report this reference number along with the particulars prescribed in rule 31A(4)(*vii*) of the Income-tax Rules, 1962 in the TDS statement furnished for the same quarter. In case the person has also received Form No.15H during the same quarter, please allot separate series of serial number for Form No.15G and Form No.15H.

<sup>12</sup>The person responsible for paying the income referred to in column 16 of Part I shall not accept the declaration where the amount of income of the nature referred to in sub-section (1) or sub-section (1A) of section 197A or the aggregate of the amounts of such income credited or paid or likely to be credited or paid during the previous year in which such income is to be included exceeds the maximum amount which is not chargeable to tax. For deciding the eligibility, he is required to verify income or the aggregate amount of incomes, as the case may be, reported by the declarant in columns 16 and 18.

# <sup>1</sup>FORM NO. 15H

# [See section 197A(1C) and rule 29C]

# Declaration under section 197A(1C) to be made by an individual who is of the age of sixty years or more claiming certain incomes without deduction of tax.

1. Name of Assessee (Declarant) 3. Date of 2. Permanent Account Birth<sup>2</sup>(DD/MM/YYYY) Number or Aadhaar Number of the Assessee<sup>1</sup> 5. Flat/Door/Block No. 6. Name of Premises 4. Previous  $year(P.Y.)^3$  (for which declaration is being made) 7. Road/Street/Lane 8. Area/Locality 9. Town/City/District 10. State 11. PIN 12. Email 13. Telephone No. (with STD Code) and Mobile No. Yes No 14 (a) Whether assessed to  $tax^4$ : (b) If yes, latest assessment year for which assessed 15. Estimated income for which this declaration is made 16. Estimated total income of the P.Y. in which income mentioned in column 15 to be included<sup>5</sup> 17. Details of Form No.15H other than this form filed for the previous year, if any<sup>6</sup> Total No. of Form No.15H filed | Aggregate amount of income for which Form No.15H filed 18. Details of income for which the declaration is filed **S1**. Nature of income Identification number of Section under Amount of relevant which tax is income No. deductible investment/account, etc.7

PART I

Signature of the Declarant

Substituted by the IT (Fourteenth Amdt.) Rules, 2015, w.e.f. 1-10-2015. Earlier Form No. 15H was amended by the IT (Fifth Amdt.) Rules, 1982, w.e.f. 21-6-1982, IT (Fifth Amdt.) Rules, 1989, w.r.e.f. 1-4-1988, IT (Fourteenth Amdt.) Rules, 1990, w.e.f. 20-11-1990, IT (Twelfth Amdt.) Rules, 1992, w.e.f. 1-6-1992, IT (Seventh Amdt.) Rules, 1995, w.e.f. 1-7-1995, IT (Thirty-second Amdt.) Rules, 1999, w.e.f. 19-11-1999, IT (Twelfth Amdt.) Rules, 2002, w.e.f. 21-6-2002, IT (Eighth Amdt.) Rules, 2003, w.e.f. 9-6-2003, IT (Fourteenth Amdt.) Rules, 2003, w.e.f. 1-8-2003 and IT (Second Amdt.) Rules, 2013, w.e.f. 19-2-2013.

# Declaration/Verification<sup>8</sup>

Place: ..... Date: .....

.....

Signature of the Declarant

# PART II

# [To be filled by the person responsible for paying the income referred to in column 15 of Part I]

1. Name of the person responsible for paying			2. Unique Identification No. <sup>9</sup>			
3. Permanent Account Number or Aadhaar Number of the person responsible for paying	4. Complete Address			5. TAN of the person responsible for paying		
6. Email	7. Telephone No. (with STD Code) and Mobile No.			8. Amount of income paid <sup>10</sup>		
				the income has been /MM/YYYY)		

Place: ..... Date: .....

.....

Signature of the person responsible for paying the income referred to in column 15 of Part I

\*Delete whichever is not applicable.

1. As per provisions of section 206AA(2), the declaration under section 197A(1C) shall be invalid if the declarant fails to furnish his valid Permanent Account Number or Aadhaar Number.

2. Declaration can be furnished by a resident individual who is of the age of 60 years or more at any time during the previous year.

3. The financial year to which the income pertains.

4. Please mention "Yes" if assessed to tax under the provisions of Income-tax Act, 1961 for any of the assessment year out of six assessment years preceding the year in which the declaration is filed.

5. Please mention the amount of estimated total income of the previous year for which the declaration is filed including the amount of income for which this declaration is made.

6. In case any declaration(s) in Form No. 15H is filed before filing this declaration during the previous year, mention the total number of such Form No. 15H filed along with the aggregate amount of income for which said declaration(s) have been filed.

7. Mention the distinctive number of shares, account number of term deposit, recurring deposit, National Savings Schemes, life insurance policy number, employee code, etc.

8. Before signing the declaration/verification, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under section 277 of the Income-tax Act, 1961 and on conviction be punishable—

- (*i*) in a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine;
- (*ii*) in any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine.

9. The person responsible for paying the income referred to in column 15 of Part I shall allot a unique identification number to all the Form No. 15H received by him during a quarter of the financial year and report this reference number along with the particulars prescribed in rule 31A(4)(vii) of the Income-tax Rules, 1962 in the TDS statement furnished for the same quarter. In case the person has also received Form No.15G during the same quarter, please allot separate series of serial number for Form No.15H and Form No.15G.

10. The person responsible for paying the income referred to in column 15 of Part I shall not accept the declaration where the amount of income of the nature referred to in section 197A(1C) or the aggregate of the amounts of such income credited or paid or likely to be credited or paid during the previous year in which such income is to be included exceeds the maximum amount which is not chargeable to tax after allowing for deduction(s) under Chapter VI-A, if any, or set off of loss, if any, under the head "income from house property" for which the declarant is eligible. For deciding the eligibility, he is required to verify income or the aggregate amount of incomes, as the case may be, reported by the declarant in columns 15 and 17.

<sup>1</sup>[**Provided** that such person shall accept the declaration in a case where income of the assessee, who is eligible for rebate of income-tax under section 87A, is higher than the income for which declaration can be accepted as per this note, but his tax liability shall be nil after taking into account the rebate available to him under the said section 87A.]

<sup>1.</sup> Inserted by Income-tax (4th Amendment) Rules, 2019, w.e.f. 22-5-2019.

## Self-declaration of income not effectively connected to any permanent establishment in India

(To be declared by non-resident shareholder for availing the benefits of lower tax deduction under Section 90 of the Indian Income Tax Act read with the provisions of the Double Tax Avoidance Treaty with India read along with Multilateral Instrument)

To, Birlasoft Limited

Pune, India

I/We, [.....] do hereby solemnly declare as follows:

I/We am/are a resident in [.....Insert name of country of which the shareholder is tax resident]. I am a Non-Resident of India as per Tax Laws of India.

I am/We declare that the dividend income receivable by me/us from investment in the shares of Birlasoft Limited is not effectively connected to any permanent establishment in India.

I/We undertake to intimate Birlasoft Limited immediately in case of any alteration in the aforesaid declaration including change in tax residential status, etc.

I, [.....], hereby declare that the contents above are correct, complete and truly stated.

(Name, designation & signature of non-resident Shareholder)

Company Seal (if applicable)

Date:

Place:

Address:

# To be printed on Letterhead

Date:

To, Birlasoft Limited Pune, India

Dear Sir/Ma'am,

# Subject: Declaration regarding Tax residency and Beneficial ownership of shares

**Ref: PAN – Mention PAN of Shareholder** 

# Folio Number / DP ID/ Client ID – Mention all the account details

With reference to the captioned subject and in relation to the appropriate deduction of taxes on the dividend payable to me/us by Birlasoft Limited ("the Company"), I/We hereby declare as under:

- I/We, <<full name of the shareholder>>, and holding <<mention number of shares held>> number of shares of the Company as on the record date hereby declare that I/We am/are a tax resident of <<country name>> for the period April 1, 2022 to March 31, 2023 (Indian Fiscal Year) as per tax treaty between India and <<country name>>.
- I / We hereby declare that, I /we am/are the beneficial owner of the share/shares held in the Company as well as the dividend arising from such shareholding; and I/ we have the right to use and enjoy the dividend received/ receivable from the above shares and such right is not constrained by any contractual and/ or legal obligation to pass on such dividend to another person.
- I/We confirm that I/We am/are entitled to claim the benefits under the Treaty as modified by the multilateral convention to implement tax treaty related measures to prevent base erosion and profit shifting (MLI) including but not limited to the Principal Purpose Test (PPT), Limitation of Benefit Clause (LOB), Simplified Limitation of Benefits (SLOB), period of holding of shares etc. as applicable. We specifically confirm that my affairs / affairs were not arranged such that the main purpose or the principal purpose thereof was to obtain tax benefits available under the applicable tax treaty.
- I/We confirm that I/We have not entered into an impermissible avoidance arrangement i.e. an arrangement, the main purpose or one of the main purposes of which is to obtain

a tax benefit and it (a) creates rights, or obligations, which are not ordinarily created between persons dealing at arm's length (b) results, directly or indirectly, in the misuse, or abuse, of the provisions of this Act (c) lacks commercial substance or is deemed to lack commercial substance under section 97, in whole or in part; or (d) is entered into, or carried out, by means, or in a manner, which are not ordinarily employed for bona fide purposes.

- I/We hereby furnish a copy of valid Tax Residency Certificate dated \_\_\_\_\_\_ having Tax Identification number\_\_\_\_\_\_ issued by \_\_\_\_\_\_ along with a copy of Form 10F duly filled and signed for the period April 1, 2022 to March 31, 2023.
- Our Indian Permanent Account Number is <<PAN>>/ We do not have a PAN allotted to us by Indian Income tax authority <<strike off what is not applicable>>. In case, PAN is not available, I/We confirm the following details as:
  - (a) name:
  - (b) email ID:
  - (c) contact number:
  - (d) address in residency country:
  - (e) Tax residency certificate from the Government of that country or specified territory
  - (f) Tax identification number of the residency country.
- I/We further declare that I/we do not have and will not have any taxable presence, business connection, fixed base or Permanent Establishment in India as per the said tax treaty during the period April 1, 2022 to March 31, 2023.
- If, I /We have any Permanent Establishment or fixed base in India as construed under relevant Articles of the applicable tax treaty but the dividend income receivable by me/us from investment in the shares of the Company is not effectively connected to said Permanent Establishment in India. Further I/We hereby declare and confirm that I/We do not fall under the definition of 'specified person' as provided in section 206AB of the IT Act
- We hereby confirm that we do/ will not have a place of effective management, during the period April 1, 2022 to March 31, 2023, in India and none of the key management and commercial decisions for the conduct of business in substance are/ will be made in India.
- I confirm that, being individual, my aggregate presence in India for the period of April 1, 2022 to March 31, 2023 does not exceed 120 days.
- I/We hereby confirm that the above declaration should be considered to be applicable for all the shares held in the Company under PAN/ accounts declared in the form.

• This declaration is valid for the period April 1, 2022 to March 31, 2023. In case of any change in the declaration on any of the above aspects, we undertake to promptly intimate you of the said event.

# VERIFICATION

I/We \_\_\_\_\_\_ (Signatory Name), in my capacity as \_\_\_\_\_\_ (Authorised Signatory\*) of \_\_\_\_\_\_ (Name of the Shareholder) confirm that the above is true and I/We shall be solely responsible for any income-tax consequences (tax, including interest and penalty) arising under the Income Tax Act, 1961 in relation to the dividend income to be received from the Company. Further, I/we agree and undertake: (1) to indemnify the Company in relation to any Income tax consequences (tax, including interest and penalty) arising under the Income Tax Laws if any of the above is questioned and held otherwise by the Income Tax Authorities; (2) to provide all the necessary documentation as sought by the Indian Tax Authorities in this regard.

# << Entity Name>>

(Signature)

 Place: ......
 Name: \_\_\_\_\_\_

 Date: .....
 Designation: \_\_\_\_\_\_

 Email address: \_\_\_\_\_\_
 Email address: \_\_\_\_\_\_

 Contact Number: \_\_\_\_\_\_
 Tax Identification Number: \_\_\_\_\_\_

 Contact Address: \_\_\_\_\_\_
 Contact Address: \_\_\_\_\_\_\_

(\*In case of any Authorised Signatory being other than Director/ Managing Director, please attach the valid Power of Attorney authorising the individual as an Authorised Signatory.)

The shareholders are required to provide a Declaration strictly as per the specified format given above, failing which the Company reserves the right to deny the Treaty benefits.