13. **Taxability and Other Dividend Related Information**

As per the Income Tax Act, 2025 (the Act), dividend paid and distributed by a Company is taxable in the hands of shareholders. The Company shall, therefore, be required to deduct taxes at source (TDS) at the time of making payment of the dividend, if approved by the Shareholders at the forthcoming AGM.

The TDS rate may vary depending on the residential status of the Shareholder and the documents submitted by the Shareholders and accepted by the Company in accordance with the provisions of the Act. The TDS for various categories of Shareholders along with required documents are summarized below:

<u>Table1: Resident Shareholders:</u>

Tax is required to be deducted at source under Section 393(1) read with 393(4) of the Act, at the rate of 10% on the amount of dividend where Shareholders have registered their valid Permanent Account Number (PAN). In case, Shareholders do not have PAN/invalid PAN/PAN not linked with Aadhaar, TDS at the rate of 20% shall be deducted under Section 397(2) of the Act.

Particulars & Category of shareholders	Rate of Tax Deduction	Exemption documents to be given
Resident Individuals		
If total Dividend income to a resident individual shareholder in Tax year 2026-27 > ₹10,000/-	- 10% in case where PAN is provided/available - 20% in other cases where Section 397(2) becomes applicable or if PAN status is inoperative	Update the PAN if not already done with depositaries (in case of shares held in demat mode) and with the Company's Registrar and Transfer Agents – Bigshare Services Pvt Ltd ("RTA") (in case of shares held in physical mode).
Shareholders providing duly signed Form 121 (applicable to all Individuals and HUF with Zero estimated tax liability) provided that all the prescribed eligibility conditions are met.	NIL	Form 121, duly signed – The form shall be duly filled in and signed in accordance with the requirements prescribed under the applicable provisions of the Act. The same can be downloaded from the website of the RTA at **<u>https://www.bigshareonline.com/resources-sebi_circular.aspx#parentHorizontalTab3lChildVerticalTab_38</u>**
If total Dividend income to a resident individual shareholder in Tax year 2026-27 < ₹10,000/-	NIL	-
Exemption certificate is issued by the Income-tax Department, if any.	NIL	Exemption certificate issued by the Income-tax Department for Tax year 2026-27.

Particulars & Category of shareholders	Rate of Tax Deduction	Exemption documents to be given
Resident – Other than Individuals		
Indian Commercial Banks/Indian Financial Institutions	- 10% in case where PAN is provided/available - 20% in other cases where Section 397(2) becomes applicable	-
Insurance Companies	NIL	Self-declaration that it qualifies as 'Insurer' as per section 2(7A) of the Insurance Act, 1938 and has full beneficial interest with respect to the equity shares owned by it along with self-attested copy of PAN card and certificate of registration with Insurance Regulatory and Development Authority (IRDA)/ Life Insurance Corporation of India (LIC)/ General Insurance Corporation of India (GIC).
Mutual Funds	NIL	Self-declaration that it is registered with Securities and Exchange Board of India (SEBI) and as specified at Schedule VII to section 11 of the Act along with self-attested copy of PAN card and certificate of registration with SEBI.
	- 10% in case where PAN is provided/available - 20% in other cases where Section 397(2) becomes applicable	In case of mutual funds not covered under section 11 of the Income Tax Act, 2025
Alternative Investment Fund	NIL	Self-declaration that its income is exempt under Schedule V to section 11 of the Act, and they are registered with SEBI as Category I or Category II AIF along with self-attested copy of the PAN card and certificate of AIF registration with SEBI
	- 10% in case where PAN is provided/available - 20% in other cases where Section 397(2) becomes applicable	In case AIF other than those registered with SEBI as per clause 224 of Income Tax Bill, 2025
National Pension System (NPS) Trust	NIL	Self-declaration that it qualifies as NPS Trust and income is eligible for exemption under Schedule VII to section 11 of the Act and being regulated by the provisions of the Indian Trusts Act, 1882 along with self-attested copy of the PAN card.
Government of India, Corporation established by or under a Central Act which is, under any law for the time being in force, exempt from income- tax on its income (Section 393)	NIL	Self-declaration specifying the specific Central Act under which such corporation is established and that their income is exempt under the provisions of Income Tax Act, 2025 along with a self-attested copy of the PAN card and registration certificate.
Order under section 395(1) of the Act	Rate provided in the order	Self-attested copy of certificate obtained from Income tax Authorities.
Other resident shareholder without PAN / Invalid PAN	20% as per Section 397(2) of the Act	-

Table 2: Non-resident Shareholders

Taxes are required to be withheld in accordance with the provisions of Section 393(2) of the Act as per the rates as applicable. As per the relevant provisions of the Act, the withholding tax shall be at the rate of 20% (plus applicable surcharge and cess) on the amount of dividend payable to them. In case, non-resident Shareholders provide a certificate issued under Section 395(1) of the Act, for lower/ Nil withholding of taxes, rate specified in the said certificate shall be considered, on submission of self-attested copy of the same.

As per Section 159 of the Act, the non-resident Shareholder has the option to be governed by the provisions of the DTAA between India and the country of tax residence of the Shareholder, if they are more beneficial to them. For this purpose, i.e. to avail DTAA benefit, the non-resident Shareholders are required to submit the documents as provided in the table:

Category of shareholder	Tax Deduction Rate	Exemption applicability /Documentation requirement
Any non-resident shareholder	20% (plus applicable surcharge and cess) OR Tax Treaty rate whichever is lower	The Tax Treaty rate shall be applied for tax deduction at source on submission of following documents to the RTA: i. Self-attested copy of the PAN card allotted by the Indian Income Tax authorities. ii. Self-attested copy of Tax Residency Certificate (TRC) for the year 2026-27 or calendar year 2026, valid as on record date, obtained from the tax authorities of the country of which the Shareholder is a resident. iii. Self-declaration in Form 41 for Tax Year 2026-27 executed in electronic mode from Income tax portal which can be downloaded from https://eportal.incometax.gov.in/ iv. Self-declaration by Shareholder of meeting treaty eligibility requirement and satisfying beneficial ownership requirement (Tax Year 2026-27) and not having a PE in India. v. In case of Foreign Institutional Investors and Foreign Portfolio Investors, copy of SEBI registration certificate. vi. In case of shareholder being tax resident of Singapore, please furnish the letter issued by the competent authority or any other evidence demonstrating the non-applicability of Article 24 - Limitation of Relief under India-Singapore Double Taxation Avoidance Agreement. **Note:** 1. It is recommended that shareholders should independently satisfy their eligibility to claim DTAA benefit including meeting of all conditions prescribed in DTAA. 2. Kindly note that the Company is not obligated to apply beneficial DTAA rates at the time of tax deduction/withholding on dividend amounts. Application of beneficial rate as per DTAA for the purpose of withholding taxes shall depend upon completeness and satisfactory review by the Company of the documents submitted by the non-resident shareholder.
Global Depository Receipt (GDR) Holders	10%	a) Taxes shall be withheld at 10% (including surcharge and cess as applicable) in accordance with the provisions of section 393(2) [Table Sl. No 13] of the Act. In such case, a self-attested copy of the PAN card is required. b) In case no PAN details are made available, tax will be deducted at 20% plus applicable surcharge and cess.

The following provisions under the Act shall also be considered to determine the applicable TDS rate:

Declaration under Rule 203:

In terms of Rule 203 of the Income Tax Rules 2026, if dividend income on which tax has been deducted at source is assessable in the hands of a person other than the deductee, then such deductee should file declaration with Company in the manner prescribed in the Rules.

The Shareholders holding shares under multiple accounts under different status / category and single PAN, may note that, higher of the tax as applicable to the status in which shares held under a PAN will be considered on their entire holding in different accounts.

PROCEDURE FOR SUBMISSION OF DOCUMENTS:

Form 121 / Form 41 can be downloaded from the website of our RTA i.e. Bigshare Services Private Limited at https://www.bigshareonline.com/resources-sebi_circular.aspx#parentHorizontalTab3lChildVerticalTab_38. The above-mentioned documents (duly completed and signed) are required to be sent to company's RTA at their email ID at tds@bigshareonline.com.

Please note that the duly completed and signed documents should be sent to the RTA before the record date for dividend i.e in order to enable the Company to determine and deduct appropriate TDS / Withholding Tax. Incomplete and/or unsigned forms and declarations will not be considered by the Company. No communication/ documents on the tax determination / deduction shall be considered post record date for dividend.

Further, Shareholders who have not registered their email address are requested to register the same with the Depositories in case the shares are held in Demat and with our RTA, if the shares are held in physical form. Shareholders are further requested to update their Bank Accounts with the Depositories in case the shares are held in Demat and with our RTA if the shares are held in physical form. Shareholder holding shares in physical form can update their email ids/ bank/ Details online at company's RTA website https://www.bigshareonline.com/resources-sebi_circular.aspx#parentHorizontalTab3lChildVerticalTab_38

It may be further noted that in case the tax on said dividend is deducted at a higher rate in absence of receipt of the aforementioned details / documents from you, there would still be an option available with you to file the return of income and claim an appropriate refund, if eligible. No claim shall lie against the Company for such taxes deducted.