

**Annexure A**  
**TDS INSTRUCTIONS ON DIVIDEND DISTRIBUTION**

Title	Description		
<i>Applicability</i>	In Compliance with the Finance Act, 2020, for any dividend distribution to shareholders on or after April 1, 2020, tax will be deducted at source by the Company. No TDS will be deducted for the <i>exempted category</i> of shareholders, provided they furnish the requisite documents with the Company's Registrar and Transfer Agent (RTA) on or before 'Cut-off date'.		
<b>Cut-off Date</b>	<b>12 Mid-Night, Tuesday, October 26, 2021<sup>1</sup></b>		
<i>Exempted Category</i>	<ul style="list-style-type: none"> <li>a) LIC/GIC/The New India Assurance Company Ltd / United India Insurance Company Ltd / The Oriental Insurance Company Limited / National Insurance Company Ltd and Other Insurance Companies in respect of any shares owned by it or in which it has full beneficial interest;</li> <li>b) A "business trust" as defined in section 2(13A), by a special purpose vehicle referred to in Explanation to section 10(23FC).</li> <li>c) Government; Reserve Bank of India; a 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; mutual funds;</li> <li>d) Any person for, or on behalf of, the New Pension System Trust referred to in section 10(44); Alternative Investment Fund (Category I&amp;II) or any other exempted entity;</li> <li>e) <i>Resident shareholders</i>, furnishing valid Form 15G &amp; Form 15H;</li> <li>f) <i>In case of non-resident shareholders</i>, no TDS shall be deducted subject to furnishing of valid self-attested documentary evidence like copy of registration, order or notification issued by the Indian Income Tax Authority.</li> <li>g) Any other person as may be notified by the central government in the Official Gazette in this behalf.</li> </ul>		
<i>Lower TDS / Withholding tax rates</i>	<ul style="list-style-type: none"> <li>a) <i>In case of Resident shareholders</i>: TDS shall be deducted at the rate prescribed in the <i>Lower Tax Withholding Certificate</i> issued by competent tax authority, if same is submitted with RTA before the cut-off date.</li> <li>b) <i>In case of non-resident shareholders (including FII/FPI)</i>: TDS as per Income Tax Act or Tax Treaty rate, whichever is beneficial shall be applied provided the non-resident shareholder submits the following specified documents; <ul style="list-style-type: none"> <li>i) Self-attested copy of PAN;</li> <li>ii) Self-attested copy of TRC for FY 2021-22, issued by the tax authority of the country of which shareholder is resident;</li> <li>iii) Self-declaration in Form 10F; and</li> <li>iv) Self-declaration on 'No-Permanent Establishment in India', in the format enclosed with this <b>Annexure</b>.</li> </ul> </li> </ul>		
<i>TDS Rates for FY 2021-22</i>	<b>Resident Shareholders<sup>2</sup></b>	<b>Non-Resident Shareholders</b>	
	With PAN	Without PAN/Invalid PAN	
	10%	20%	20% (Plus applicable Surcharge & Cess) <sup>3</sup>
<u><i>Higher rate of TDS in case Non-filing of income tax return*</i></u>	<p>TDS needs to be deducted at higher rates in case of <b>specified persons</b> w.e.f July 1, 2021:</p> <ul style="list-style-type: none"> <li>a) Higher of below rate shall be applicable: <ul style="list-style-type: none"> <li>i) Twice the rate specified in the relevant provision of the Act; or</li> <li>ii) at twice the rate or rates in force; or</li> <li>iii) at the rate of 5%.</li> </ul> </li> <li>b) <b>Specified person</b> means-</li> </ul>		

	<p>i) a person who has not filed the returns of income for two years immediately prior to the year in which tax is required to be deducted, for which the time limit of filing return of income has expired; and</p> <p>ii) the aggregate of TDS and TCS in his case is <b>INR 50,000 or more</b> in each of these two years.</p> <p>c) This does <b>not apply</b> on payments to <b>Non-residents</b> who <b>do not have a permanent establishment in India</b>.</p> <p>d) Where the specified person does not hold a valid PAN as well as not filed the return; the tax shall be deducted at the higher rate between both the provisions.  <i>*Government has made available a mechanism/utility on the Income tax reporting portal. The same shall be used by the company to determine applicability of the above provisions.</i></p>
<u>Higher rate of TDS in case of Non-Linking of Aadhar &amp; PAN</u>	<p>a) An Individual shareholder who is eligible to obtain Aadhaar number is required to link PAN with AADHAR on or before March 31, 2022..</p> <p>b) PAN shall become inoperative if the Individual shareholder has not linked PAN-AADHAR on or before the above date &amp; all the consequences under the Income Tax Act 1961 for not furnishing PAN shall apply.</p>
<u>Reporting of Dividends paid under Statement of Financial Transactions (SFT)</u>	<p>a) W.e.f April 1,2021, Dividend paid by a company is a reportable transaction under Statement of Financial Transactions (SFT).</p> <p>b) Accordingly, the Shareholder details such as Name, Permanent Account Number (PAN), Registered Email address, dividend amount would be reported under SFT.</p>

<sup>1</sup> Please note that no communication with respect to document submission shall be accepted after the cut-off date.

<sup>2</sup> No TDS shall be deducted, if aggregate dividend distributed or paid or likely to be distributed or paid during the financial year to resident individual shareholder does not exceed INR 5,000.

<sup>3</sup> In case of non-resident shareholders, for whom tax is withheld as per Income Tax Act, the applicable surcharge & cess for FY22 shall be as tabulated under;

Dividend Income	Individual, AOP, BOI, HUF, Trust, AJP	Registered Co-op. Society or Firm/FII registered as LLP	Foreign Company/ FII registered as Foreign Company	FII / FPI characterized as AOP
Upto ₹50 Lakhs	NIL	NIL	Nil	NIL
Exceeding ₹50 Lakhs and upto ₹1 crore	10%	NIL	NIL	10%
Exceeding ₹1 Crore and upto ₹10 Crores	15%	12%	2%	15%
Exceeding ₹10 Crores			5%	

In addition to the surcharge rates as mentioned above, 'Health & Education Cess' of 4% shall be applicable for the FY22 for non-resident shareholders.

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**General Notes:**

- I) Tax rates that are applicable to shareholders depend upon their residential status and classification. All shareholders are thereby requested to update the residential status and category in their respective Demat accounts if the shareholding is in demat form or with Company's RTA, if the shareholding is held in physical form, as may be applicable before the **Cut-off date**.
- II) Application of any exemption from TDS/ lower / beneficial rate of tax is subject to submission of the requisite & valid documents with RTA before the cut-off date and also verification of the submitted documents by the Company. If the documents submitted by the shareholder are found incomplete or ambiguous, exemption/lower/beneficial rate of tax shall not be applied. Shareholders have option to claim refund of excess tax deducted from their respective Tax Authorities, in case the Company had deducted tax at source at higher rate due to non-submission / incomplete submission of documents with the RTA. No claim shall lie against the Company for such taxes deducted.
- III) If Form 15G\H is already submitted for a particular financial year, revised form is to be shared in case of change in estimated total Income or Dividend Income. In case revised form is not provided by the shareholder, the Company shall determine the TDS amount based on estimated total income and Dividend Income specified in the latest Form available with the Company.
- IV) In case the requisite documents are submitted by the shareholders through his/her registered email, the company has full right to demand for the original documents and the shareholders undertakes to abide by such request. *Documents received by Registered Post or from registered e-mail ID will only be accepted.*
- V) TDS certificates will be emailed to the shareholder's registered e-mail ID in due course. Shareholders can also view the credit of TDS in their respective Form 26AS.
- VI) In case dividend income is assessable in the hands of a person other than the registered shareholder as on the cut-off date, the registered shareholder shall furnish a declaration, to the satisfaction of RTA / Company, containing the name, address and Valid PAN of the person to whom the tax credit is to be given along with reasons for giving credit to such person. In case the PAN provided as above is Invalid, tax credit shall continue to be given to registered shareholder.
- VII) In case of joint shareholders, the shareholder named first in the Register of Members shall furnish the requisite documents for claiming any beneficial tax rate applicability.
- VIII) The referred documents can be submitted with Company's RTA before the cut-off date at <https://www.linkintime.co.in/>>> Investor Services >> Tax Exemption Registration or at the following address or through email from your registered -email ID;  
M/s. Link Intime India Private Limited  
Kind Attention: Mr. Jayprakash VP  
C-101, 247 Park, L.B.S. Marg,  
Vikhroli West,  
Mumbai-400 083,  
Maharashtra, India  
Email ID: [rnt.helpdesk@linkintime.co.in](mailto:rnt.helpdesk@linkintime.co.in)
- IX) Shareholders can contact Company for any query related to dividend on [Investor@Lntinfotech.com](mailto:Investor@Lntinfotech.com).

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## FORMAT OF DECLARATION FOR NO-PERMANENT ESTABLISHMENT IN INDIA

Date:

To,  
Larsen & Toubro Infotech Limited  
Technology Tower 1, Gate No. 5,  
Saki Vihar Road, Powai, Mumbai  
400072, India  
E-mail:- Investor@Lntinfotech.com

**Subject: Self-declaration for Indian Financial Year (FY) 2021-22 with respect to availment of tax treaty benefits in relation to receipt of dividend income from Larsen & Toubro Infotech Limited.**

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

- I / We, \_\_\_\_\_ (full name of the shareholder), having Permanent Account Number (PAN) under the Indian Income Tax Act, 1961 ('the Act') \_\_\_\_\_ (mention PAN), and holding \_\_\_\_\_ (mention number of shares held) number of shares of the Company as on the record date. I / We am / are a tax resident of \_\_\_\_\_ (country name). A copy of the valid tax residency certificate for the period April 1, 2021 to March 31, 2022, is attached herewith.
- I / We am / are tax resident of the \_\_\_\_\_ (country name) as defined under Article \_\_\_ of the tax treaty between India and \_\_\_\_\_ ('the applicable tax treaty'). I / We am / are eligible to be governed by the provisions of the applicable tax treaty as modified by the "Multilateral Instrument (MLI)" and meet all the necessary conditions to avail the benefits under the applicable tax treaty.
- I / We do not have any Permanent Establishment ('PE') or fixed base in India as construed under relevant Articles of the applicable tax treaty nor do we have any PE or business connection in India as construed under the relevant provisions of the Act.
- As required to claim the benefits of the lower tax rate under the applicable tax treaty in relation to the dividend income to be received by me / us from the Company, I / We specifically confirm that I / We am / are the beneficial owner of the above referred equity shares of the Company and the dividend income receivable from the Company in relation to the said shares.
- I / We further declare that 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 specifically confirm that my affairs / affairs of \_\_\_\_\_ (full name of the shareholder) were arranged such that the main purpose or the principal purpose thereof was not to obtain tax benefits available under the applicable tax treaty.

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- Further, our claim for relief under the tax treaty is not restricted by application of Limitation of Benefit clause, if any, thereunder.

This declaration is valid for the period 1 April, 2021 to 31 March, 2022.

I / We confirm that the above is true to the best of our knowledge and I / We shall be solely responsible for any adverse income-tax consequences (tax, including interest and penalty) arising under 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 Income Tax Authorities in this regard.

For.....< Mention the name of the payee>

Authorised Signatory

Name:

Designation:

Place:

Date:

**Note:**

- a) 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.
- b) In case of a Company, issue on a letter head
- c) 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.