

ANNEXURE-A

TDS instructions on dividend distribution

Title	Description									
Applicability	<p>In compliance with Income Tax Act, 1961 ('the Act') read with Finance Act, 2020, for any dividend distribution to shareholders on or after April 1, 2020, tax will be deducted at source ('TDS') by the Company.</p> <p>In view of the above, in the current financial year 2022-23, the Company shall be deducting TDS as per applicable provisions and TDS rates, while paying dividend.</p> <p>No TDS will be deducted for the exempted category of shareholders, provided they furnish the requisite documents with the Company's Share Registrar and Transfer Agent (RTA) on or before 'Record date' (mentioned below).</p>									
Record date	Friday, July 1, 2022ⁱ									
Exempted Category	<p>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 shares owned by them or in which they have full beneficial interest;</p> <p>b) A "business trust" as defined in section 2(13A) of the Act, by a special purpose vehicle referred to in explanation to section 10(23FC) of the Act;</p> <p>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;</p> <p>d) Any person for, or on behalf of, the New Pension System Trust referred to in section 10(44) of the Act; Alternative Investment Fund (Category I&II) or any other exempted entity;</p> <p>e) Resident shareholders furnishing valid Form 15G or Form 15H;</p> <p>f) In case of non-resident shareholders, no TDS shall be deducted subject to furnishing valid self-attested documentary evidence like copy of registration, order or notification issued by the Indian Income Tax Authority;</p> <p>g) Any other person as may be notified by the Central Government in the Official Gazette in this behalf.</p>									
Lower TDS / Withholding tax rates	<p>a) In case of Resident shareholders: TDS shall be deducted at the rate prescribed in the lower tax withholding certificate issued by competent tax authority, if same is submitted with RTA before the Record date.</p> <p>b) In case of non-resident shareholders (including FII/FPI): TDS as per the Act or Tax Treaty rate, whichever is beneficial shall be applied, provided the non-resident shareholder submits the following documents:</p> <p>i) Self-attested copy of Permanent Account Number (PAN);</p> <p>ii) Self-attested copy of TRC for FY 2022-23, issued by the tax authority of the country of which shareholder is resident;</p> <p>iii) Self-declaration in Form 10F; and</p> <p>iv) Self-declaration on 'No-Permanent Establishment in India', in the format annexed.</p>									
TDS rates for FY-23	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 35%; text-align: center;"><u>Resident Shareholdersⁱⁱ</u></th> <th style="width: 35%; text-align: center;"><u>Non-Resident Shareholdersⁱⁱⁱ</u></th> </tr> </thead> <tbody> <tr> <td>With PAN</td> <td style="text-align: center;">Without PAN/ Invalid PAN</td> <td></td> </tr> <tr> <td>10%</td> <td style="text-align: center;">20%</td> <td style="text-align: center;">20% (plus applicable surcharge & cess)</td> </tr> </tbody> </table>		<u>Resident Shareholdersⁱⁱ</u>	<u>Non-Resident Shareholdersⁱⁱⁱ</u>	With PAN	Without PAN/ Invalid PAN		10%	20%	20% (plus applicable surcharge & cess)
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With PAN	Without PAN/ Invalid PAN									
10%	20%	20% (plus applicable surcharge & cess)								

Title	Description
Higher rate of TDS in case of non-filing of income tax return*	<p>TDS shall be deducted at higher rates in case of Specified Persons (as defined below):</p> <p>a) Higher of below rate shall be applicable:</p> <p>i) twice the rate specified in the relevant provision of the Act; or</p> <p>ii) twice the rate or rates in force; or</p> <p>iii) at the rate of 5%.</p> <p>b) Specified person means-</p> <p>i) a person who has not filed return of income for the financial year immediately preceding 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 (tax collected at source) in the said financial year is INR 50,000 or more in his/her case.</p> <p>c) This does not apply on payment to non-residents who do not have a permanent establishment in India.</p> <p>d) Where the specified person does not hold a valid PAN and has not filed the return; tax shall be deducted at higher of the rate applicable for non-compliance of the requirements to hold PAN and filing of return, as required under the Act.</p> <p><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>
Higher rate of TDS in case of non-linking of Aadhar & PAN	<p>a) An Individual shareholder who is eligible to obtain Aadhar number is required to link PAN with Aadhar on or before March 31, 2023.</p> <p>b) PAN shall become inoperative if the Individual shareholder has not linked PAN - Aadhar on or before the above date & all the consequences under the Income Tax Act 1961 for not furnishing PAN shall apply.</p>
Reporting of dividend paid under Statement of Financial Transactions (SFT)	<p>a) W.e.f. April 1, 2021, dividend paid by a company is a reportable transaction under SFT.</p> <p>b) Accordingly, the shareholder's details such as name, PAN, registered address, email ID, dividend amount would be reported under SFT.</p>

Notes:

*No communication in relation to submission of document(s) shall be accepted after the Record date.

"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/-.

"In case of non-resident shareholders, for whom tax is withheld as per the Act, the applicable surcharge & cess for FY23 shall be as 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 INR 50 Lakhs	NIL	NIL	NIL	NIL
Exceeding INR 50 lakhs but upto INR 1 crore	10%	NIL	NIL	10%
Exceeding INR 1 crore but upto INR 10 crores	15%	12%	2%	15%
Exceeding INR 10 crores	15%	12%	5%	15%

*AOP: Association of Persons, BOI: Body of Individuals, HUF: Hindu Undivided Family, AJP: Artificial Juridical Person

In addition to the surcharge rates as mentioned above, 'Health & Education Cess' @ 4% shall be applicable for FY23 for non-resident shareholders

General Notes:

- I. Tax rate that is applicable to shareholders depend upon their residential status and classification. All shareholders are requested to update their 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 **Record date**.
- II. Application for exemption from TDS/ lower / beneficial rate of tax is subject to submission of the requisite & valid documents with RTA before the Record date and also verification of the documents submitted to 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 the option to claim refund of excess tax deducted from their respective tax authorities, in case the Company has 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 tax 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 shareholder through his/her registered email, the Company has the right to demand the original documents and the shareholder undertakes to abide by such request. Documents received by Registered Post or from registered e-mail ID will only be accepted.
- V. TDS certificate 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 Record 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 the 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.
- VIII. The required documents can be submitted with Company's RTA before the Record date at <https://linkintime.co.in/formsreg/submission-of-form-15g-15h.html> or through email from the registered e-mail ID or at the following address:
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
E-mail ID: rnt.helpdesk@linkintime.co.in
- IX. Shareholders may contact Company for any query related to dividend on Investor@Lntinfotech.com

FORMAT OF DECLARATION FOR NO PERMANENT ESTABLISHMENT IN INDIA

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) 2022-23 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, 2022 to March 31, 2023, is attached herewith.
- I / We, am / are tax resident of _____ (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 benefit 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.
- 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, 2022 to 31 March, 2023.

I / We, confirm that the above is true to the best of my / 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:

Notes:

- In case of the Authorised Signatory being other than Director/ Managing Director, please attach the valid Power of Attorney authorising the individual as an Authorised Signatory
- In case of a Company issue on a letter head
- Members are required to provide the declaration strictly as per the specified format given above, failing which the Company reserves the right to deny the treaty benefits