

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 2023-24, the Company shall be deducting TDS as per applicable provisions and TDS rates, while paying dividends.</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 'Cut-off date'</p>
Record Date	Friday, October 27, 2023
Cut-off Date for considering documents for TDS	Wednesday, October 25, 2023ⁱ
Exempted Category	<ul style="list-style-type: none"> 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; b) A "business trust" as defined in section 2(13A), by a special purpose vehicle referred to in explanation to section 10(23FC) of the Act; 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; 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; e) Resident shareholders, furnishing valid Form 15G & Form 15H; f) In case of non-resident shareholders, 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; g) Any other person as may be notified by the Central Government in the Official Gazette in this behalf.
Lower TDS / Withholding tax rates	<ul style="list-style-type: none"> 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 cut-off date. b) In case of non-resident shareholders (including FII/FPI): 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"> i) Self-attested copy of Permanent Account Number (PAN); ii) Self-attested copy of TRC for FY 2023-24, issued by the tax authority of the country of which shareholder is resident; iii) Self-declaration in electronically filed Form 10F; and

	iv) Self-declaration on 'No-Permanent Establishment in India', in the format enclosed with this Annexure .		
TDS Rates for FY 2023-24	Resident Shareholdersⁱⁱ		Non-Resident Shareholders
	With PAN	Without PAN/Invalid PAN	
	10%	20%	20% (Plus applicable Surcharge & Cess) ⁱⁱⁱ
Higher rate of TDS in case Non-filing of income tax return*	<p>TDS needs to be deducted at higher rates in case of specified persons:</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) at 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 case.</p> <p>c) This does not apply on payments to Non-residents who do not have a permanent establishment in India or a person who is not required to furnish return of income as notified by the Government.</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.</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 Aadhaar number is required to link PAN with Aadhaar on or before June 30, 2023.</p> <p>b) PAN shall become inoperative if the Individual shareholder has not linked PAN - Aadhaar on or before the above date & all the consequences under the Income Tax Act 1961 for not furnishing PAN shall apply.</p>		
Reporting of Dividends 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>		

ⁱNo communication with respect to document submission shall be accepted after the cut-off date.

ⁱⁱNo 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.

ⁱⁱⁱIn case of non-resident shareholders, for whom tax is withheld as per the Act, the applicable surcharge & cess for FY24 shall be as tabulated hereunder:

Dividend Income	Individual, AOP, BOI, HUF, Trust, AJP [#]	Firm/FII registered as LLP	Registered Co-op. Society	Foreign Company/ FII registered as Foreign Company	FII / FPI characterized as AOP
Upto INR 50 Lakhs	NIL	NIL	NIL	NIL	NIL
Exceeding INR 50 lakhs but upto INR 1 crore	10%	NIL	NIL	NIL	10%
Exceeding INR 1 crore but upto INR 10 crores	15%	12%	7%	2%	15%
Exceeding INR 10 crores			12%	5%	

[#]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' of 4% shall be applicable for FY24 in case of non-resident shareholders.

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://linkintime.co.in/formsreg/submission-of-form-15g-15h.html> or at the following address or through email from your registered e-mail 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
E-mail ID: rnt.helpdesk@linkintime.co.in

IX. Shareholders can contact Company for any query related to dividend on Investor@ltimindtree.com

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FORMAT OF DECLARATION FOR NO-PERMANENT ESTABLISHMENT IN INDIA

Date:

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

Subject: Self-declaration for Indian Financial Year (FY) 2023-24 with respect to availment of tax treaty benefits in relation to receipt of dividend income from LTIMindtree Limited (formerly 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 LTIMindtree Limited (formerly 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, 2023 to March 31, 2024, 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.
- We hereby provide electronically furnished Form 10F and are eligible to take recourse to tax treaty provisions, in respect of the income derived from India. **(Strike out whichever is not applicable)**
- 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.
- 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, 2023 to 31 March, 2024.

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:

Notes:

- a) In case of any Authorised Signatory being other than Director/ Managing Director, please attach the valid Power of Attorney authorizing 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.