



5th June, 2023

Dear Shareholder,

Subject: Deduction of tax at source on dividend

We hope that you and your family are doing well and are safe and healthy. Please take care of yourselves.

The Company's Board of Directors ("Board") have at their meeting held on 28th April, 2023 recommended dividend @ Rs. 38/- per equity share, having a face value of Rs. 10/- each, for the financial year ended 31st March, 2023. The dividend, as recommended by the Board, if approved at the ensuing annual general meeting, will be paid to the equity shareholders holding equity shares of the Company as at the record / book closure dates (to be announced in due course).

In terms of the provisions of the Income-tax Act, 1961, ("Act"), as amended by the Finance Act, 2020, dividend paid or distributed by a Company on or after 1st April, 2020 is taxable in the hands of shareholders. The Company will therefore deduct tax at source at the time of payment of dividend, at rates based on the category of shareholders and subject to fulfilment of conditions as provided here in below:

• **FOR RESIDENT SHAREHOLDERS:**

Tax will be deducted at source ("TDS") under Section 194 of the Act, @ 10% on the amount of dividend payable, unless exempt under any of the provisions of the Act. However, in case of individuals, TDS would not apply if the aggregate of total dividend distributed to them by the Company during the financial year does not exceed Rs. 5000 (Rupees Five Thousand only).

Tax at source will also not be deducted in cases where a shareholder provides duly signed Form No.15H (applicable to individual above the age of 60 years) / Form No.15G (applicable to other individuals), provided that the eligibility conditions are met. Blank Form No.15G and Form No.15H can be downloaded from the link given at the end of this communication or from the website of the Company viz. www.ultratechcement.com. Please note that all fields mentioned in the forms are mandatory and the Company may reject the forms submitted, if not filled correctly.

NIL / lower tax will be deducted on dividend payable to the following categories of resident shareholders, on submission of self-declarations –

- i. **Insurance companies:** Declaration (refer format) that the provisions of Section 194 of the Act are not applicable, along with self-attested copy of registration certificate and PAN card;
- ii. **Mutual Funds:** Declaration (refer format) by the mutual fund eligible for exemption u/s 10(23D) of the Act along with self-attested copies of the registration documents and PAN card;
- iii. **Alternative Investment Fund ("AIF") established in India:** Declaration (refer format) that the shareholder is eligible for exemption u/s 10(23FBA) of the Act and that they are established as Category I or Category II AIF under the Securities and Exchange Board of India (Alternative Investment Fund) Regulations, 2012, made under the Securities and Exchange Board of India Act, 1992 (15 of 1992). Copy of self-attested registration documents and PAN card should also be provided;
- iv. **New Pension System Trust:** Declaration (refer format) along with self-attested copy of documentary evidence supporting the exemption and self-attested copy of PAN card;
- v. **Other shareholders:** Declaration (refer format) along with self-attested copy of documentary evidence supporting the exemption and self-attested copy of PAN card;

- vi. Shareholders who have provided a valid certificate issued u/s 197 of the Act for lower / nil rate of deduction or an exemption certificate issued by the income tax authorities along with Declaration (refer format).
- **FOR NON-RESIDENT SHAREHOLDERS (including Foreign Institutional Investors and Foreign Portfolio Investors):**

Tax is required to be withheld in terms of the provisions of Sections 195 and 196D of the Act, at applicable rates in force. As per the relevant provisions of the Act, tax shall be withheld @ 20% (plus applicable surcharge and cess) on the amount of dividend payable. However, in terms of Section 90 of the Act, non-resident shareholders have the option to be governed by the provisions of the Double Taxation Avoidance Agreement ("DTAA") between India and the country of tax residence of the shareholder, if the DTAA provisions are more beneficial. To avail the tax treaty benefits, non-resident shareholder(s) will have to provide the following:

- i. Self-attested copy of PAN card, if allotted by the Indian income tax authorities;
- ii. Self-attested copy of Tax Residency Certificate ("TRC") obtained from the tax authorities of the country of residence of the shareholder;
- iii. In pursuance of CBDT Notification no. 03/2022 dated 16th July 2022, w.e.f. 1st April, 2023 non-resident shareholders are compulsorily required to furnish Form 10F electronically on income tax portal with their login credentials at eportal.incometax.gov.in to avail the benefit of DTAA. However, only those shareholders who do not have PAN and not required to have PAN in India as per relevant provision of the Act, can submit manual Form 10F duly signed in the format enclosed till 30th September, 2023 (as per time limit extended by CBDT vide its notification F. No. DGIT(s)-ADG(S)-3/e-filing Notification/Forms/2023/13420 dated 28th March 2023).
- iv. Self-declaration (refer format) by the non-resident shareholder of meeting the treaty eligibility requirements and satisfying beneficial ownership requirement (Non-resident having PE in India need to comply with the provisions of section 206AB of the Act);
- v. In case of Foreign Institutional Investors and Foreign Portfolio Investors, self-attested copy of the registration certificate issued by the Securities and Exchange Board of India

The formats and declarations can be downloaded from the link given at the end of this communication or from the Company's website viz. www.ultratechcement.com.

Application of beneficial DTAA rate shall depend upon the completeness and satisfactory review by the Company, of the documents submitted by non-resident shareholders and meeting the requirements of the Act, read with the applicable tax treaty. It must be ensured that self-declaration should be addressed to the Company and must be in same format as attached. In absence of the same, the Company will not be obligated to apply the beneficial DTAA rates at the time of deducting tax on dividend.

- **SECTION 206AB OF THE ACT**

Rate of TDS @ 10% u/s 194 of the Act is subject to provisions of Section 206AB of the Act (effective from 1st July, 2021) which introduces special provisions for TDS in respect of taxpayers who have not filed their income-tax return (referred to as "specified persons"). U/s 206AB of the Act, tax is to be deducted at higher of the following rates in case of payments to the 'specified persons':

- at twice the rate specified in the relevant provisions of the Act; or
- at twice the rate or rates in force; or
- at the rate of 5%.

In cases where both, Sections 206AA (higher rate of TDS at 20% in no PAN cases) and 206AB (non-filer of tax returns) are applicable to a shareholder, tax will be deducted at higher of the two rates prescribed in these sections.

The non-resident who does not have permanent establishment is excluded from the scope of a 'specified person'. The Company will be using online functionality of the Income-tax department to determine the applicability of Section 206AB of the Act (as per the Central Board of Direct Taxes Circular No. 11 of 2021 dated 21st June 2021) and no claim shall lie against the Company for such tax deducted.

TDS to be deducted at a higher rate in case of non-linkage of PAN with Aadhaar

As per Section 139AA of the 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 Act. The Company will be using online functionality of the Income-tax department for the above purpose and no claim shall lie against the Company for such taxes deduction. As of now CBDT vide its circular 03/2023 dated 28th March 2023 has extended the time limit for linking PAN with Aadhaar up to 30th June, 2023. If you have not linked your PAN with Aadhaar kindly do so, to avoid higher Tax deduction. To summarize, dividend will be paid after deducting tax at source as under: To summarize, dividend will be paid after deducting tax at source as under:

- i. NIL for resident shareholders (individuals) receiving dividend upto Rs. 5,000 or in case duly filled up and signed Form No.15G / Form No.15H (as applicable) along with self-attested copy of the PAN card is submitted.
- ii. 10% for other resident shareholders in case copy of PAN card is provided / available.
- iii. 20% for resident shareholders if copy of PAN card is not provided / not available or PAN is not linked with Aadhaar.
- iv. Tax will be assessed based on documents submitted by the non-resident shareholders.
- v. 20% plus applicable surcharge and cess for non-resident shareholders in case the relevant documents are not submitted.
- vi. Lower/ NIL TDS on submission of self-attested copy of the valid certificate issued under Section 197 of the Act.

The above-mentioned rates will be subject to the applicability of Section 206AB of the Act.

In terms of Rule 37BA of the Income Tax Rules 1962, 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 (refer format) with the Company in the manner prescribed in the Rules.

In case tax on dividend is deducted at a higher rate in the absence of receipt or due to defect in any of the aforementioned details / documents, claim for refund of the excess tax deducted can be made at the time of filing your income tax return. No claim shall lie against the Company for such taxes deducted.

• **UPDATION OF PAN, EMAIL ADDRESS AND OTHER DETAILS:**

Shareholders holding shares in dematerialized mode, are requested to update their records such as tax residential status, PAN, registered email address, mobile number and other details with their relevant depositories through their depository participants. Shareholders holding shares in physical mode are requested to furnish details to the Company's Registrar and Transfer Agent, viz. KFin Technologies Limited ("KFin") through relevant ISR forms. The Company is obligated to deduct tax at source based on the records made available by National Securities Depository Limited or Central Depository Services (India) Limited ("the Depositories") in case of shares held in electronic mode and from the RTA in case of shares held in physical mode and no request will be entertained for revision of TDS return. No subsequent requests for any change in residential status, PAN, address etc. as available on the record date will be entertained by the Company.

Kindly note that the aforementioned documents should be uploaded with KFin at <https://ris.kfintech.com/form15> or emailed to einward.ris@kfintech.com. You can also email the same to sharesutcl@adityabirla.com. No communication on the tax determination / deduction shall be entertained after 15th July, 2023.

- **UPDATE OF BANK ACCOUNT DETAILS:**

While on the subject, we request you to submit / update your bank account details with your Depository Participant, in case you are holding shares in the electronic form. In case your shareholding is in the physical form, you will have to submit Form ISR-1, duly signed by you, along with a cancelled cheque leaf with your name and bank account details and a copy of your PAN card, duly self-attested, with KFin. This will facilitate receipt of dividend directly into your bank account. In case the cancelled cheque leaf does not bear your name, please attach a copy of the bank passbook statement duly self-attested.

We seek your co-operation.

Yours faithfully,
For UltraTech Cement Limited

Sanjeeb Kumar Chatterjee
Company Secretary

Form no. 15G
Form no. 15H
Form no. 10F
Self-declaration (Resident shareholder)
Self-declaration (Non-resident shareholder)

Disclaimer: The information set out herein above 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 shareholders are advised to consult their tax consultant with respect to specific tax implications arising out of receipt of dividend.