

# PILANI INVESTMENT AND INDUSTRIES CORPORATION LIMITED

CIN : L24131WB1948PLC095302

REGD. OFFICE : BIRLA BUILDING, 9/1, R. N. MUKHERJEE ROAD, KOLKATA-700001

Email : [pilani@pilaniinvestment.com](mailto:pilani@pilaniinvestment.com), TELEPHONE : 033 4082 3700 / 2220 0600, Website : [www.pilaniinvestment.com](http://www.pilaniinvestment.com)

24<sup>th</sup> June, 2024

Manager,  
Listing Department  
National Stock Exchange of India Ltd.  
"Exchange Plaza", Plot No. C/1, G Block  
Bandra Kurla Complex, Bandra (East)  
Mumbai – 400 051

Manager (Listing)  
BSE Ltd.  
Phiroze Jeejeebhoy Towers  
Dalal Street,  
Mumbai-400 001

**Sub: Communication to Shareholders for TDS deduction**

**Ref: Scrip Code: NSE: PILANIINVS :: BSE: 539883:: ISIN: INE417C01014**

Dear Sir,

In accordance with the provisions of the Income Tax Act, 1961, ("the Act") as amended by the Finance Act, 2020, dividend paid or distributed by a Company on or after 1<sup>st</sup> April, 2020 shall be taxable in the hands of the shareholders. The Company shall therefore be required to deduct tax at source ("TDS") at the time of payment of dividend to shareholders at the applicable rates.

In this connection, please find enclosed herewith a communication to shareholders regarding deduction of tax at source on dividend which is being sent to those shareholders whose email IDs are registered with the Company/Depositories. The communications along with annexures would also be available on the website of the Company i.e. [www.pilaniinvestment.com](http://www.pilaniinvestment.com).

You are kindly requested to take the same on record.

Thanking you,

Yours faithfully,  
For **Pilani Investment and Industries Corporation Ltd.**

**Company Secretary**

*Encl: As above*

# PILANI INVESTMENT AND INDUSTRIES CORPORATION LIMITED

Registered Office:

Birla Building, 9/1, R. N. Mukherjee Road, Kolkata- 700001

Phone Nos: 033 4082 3700/ 2220 0600

Website : [www.pilaniinvestment.com](http://www.pilaniinvestment.com)

E-mail- [pilani@pilaniinvestment.com](mailto:pilani@pilaniinvestment.com)

CIN: L24131WB1948PLC095302

Dear Shareholder,

**Subject: Communication to Shareholders for TDS deduction**

We are pleased to inform you that the Board of Directors at their Meeting held on 28<sup>th</sup> May, 2024 has recommended a Dividend of Rs. 15/- per Equity Share of Rs.10/- each (150%) for the Financial Year ended 31<sup>st</sup> March, 2024 and the said Dividend will be payable post approval of the shareholders at the ensuing Annual General Meeting (“AGM”) of the Company.

As you are aware that as per the Income Tax Act, 1961, as amended by the Finance Act, 2020, dividends paid or distributed by a Company on or after 1<sup>st</sup> April, 2020 shall be taxable in the hands of the shareholders. The Company shall therefore be required to deduct tax at source at the time of making the payment of the said Dividend, if declared at the ensuing AGM.

The TDS rate may vary depending on the residential status of the shareholder and the documents submitted to the Company in accordance with 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 financial year 2024-25 does not exceeds Rs.5,000/-. The TDS for various categories of shareholders along with required documents are provided in Table below:

**Table 1: Resident Shareholders**

Category of shareholder	Tax Deduction Rate	Exemption applicability/ Documentation requirement
Any resident shareholder	10%	Update the PAN if not already done with depositories (in case of shares held in demat mode) and with the Company's Registrar and Transfer Agents – Niche Technologies Private Limited (in case of shares held in physical mode).
Order under section 197 of the Act	Rate provided in the Order	Lower/NIL withholding tax certificate obtained from Income Tax authorities.
Insurance Companies: Public & Other Insurance Companies	NIL	Documentary evidence that the provisions of section 194 of the Act are not applicable.
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.	NIL	Documentary evidence that the person is covered under section 196 of the Act.
Mutual Funds	NIL	Documentary evidence that the person is covered under section 196 of the Act.
Alternative Investment fund (Category I / II )	Nil	Documentary evidence that the person is covered by Notification No. 51/2015 dated 25 <sup>th</sup> June 2015.
Alternative Investment Fund (Category III)	10%	Documentary evidence that the person is a Resident
Other resident shareholder without PAN/Invalid PAN	20%	

Further, upon registering valid PAN details, if you are a shareholder falling under the following categories:

- i. Shareholders of the age of 60 years or more are eligible to furnish Form 15 H;
- ii. Other individual shareholders eligible to furnish Form 15 G;
- iii. Shareholders having communication/Order under Section 197 of the Income Tax Act for deduction of tax at a lower/NIL rate

You may furnish the duly completed applicable Form (copies enclosed), authorizing the company to pay dividends without deduction of tax / lower rate by email at [pilani@pilaniinvestment.com](mailto:pilani@pilaniinvestment.com) or at [nichetechpl@nichetechpl.com](mailto:nichetechpl@nichetechpl.com) on or before 16<sup>th</sup> August, 2024. If a shareholder is exempted from TDS provisions through any circular or notification, you are requested to provide an attested copy of the PAN along with the documentary evidence in relation to the same.

**Table 2: Non-resident Shareholders**

Category of shareholder	Tax Deduction Rate	Exemption applicability/ Documentation Requirement
Any non-resident shareholder including Foreign Institutional Investors, Foreign Portfolio Investors (FII, FPI) (Section 196D read with Section 115AD)	20% (plus applicable surcharge and cess) or Tax Treaty rate whichever is lower	<p>Non-resident shareholders may opt for tax rate under Double Taxation Avoidance Agreement ("Tax Treaty"). The Tax Treaty rate shall be applied for tax deduction at source on submission of following documents to the company</p> <ul style="list-style-type: none"> <li>❖ Self attested copy of the PAN Card, allotted by the Indian Authorities and/or Self-attested copy of Tax Residency Certificate (TRC) valid as on the AGM date obtained from the tax authorities of the country of which the shareholder is resident.</li> <li>❖ Online Form 10F.</li> <li>❖ Self-declaration confirming not having a Permanent Establishment in India and eligibility to Tax Treaty benefit.</li> </ul> <p>TDS shall be recovered at 20% (plus applicable surcharge and cess) if any of the abovementioned Documents are not provided.</p> <p>The Company is not obligated to apply the Tax Treaty rates at the time of tax deduction/withholding on dividend amounts. Application of Tax Treaty rate shall depend upon the completeness of the documents submitted by the non-resident shareholder and are in accordance with the provisions of the Act.</p>
Alternative Investment fund (Category III) (Non Resident Non Corporates)	30% (plus applicable surcharge and cess)	None
Alternative Investment fund (Category III) (Non Resident Corporates)	40% (plus applicable surcharge and cess)	None
Submitting Order under section 197 of the Act	Rate provided in the Order	Lower/Nil withholding tax certificate obtained from Income Tax Authorities.

If you have not registered your valid PAN details with the Depository Participant/ with the Company against your demat account/ registered folio respectively, recording of the valid PAN is mandatory. In absence of valid PAN, tax will be deducted at a higher rate of 20% as per Section 206AA of the Act.

You are requested to register your valid PAN details with the Depository Participant/ with the Company/RTA against your demat account/ registered folio respectively on immediate basis.

**Notes:**

- i. 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
- ii. TDS to be deducted at higher rate in case of non-filers of Return of Income.

The Finance Act, 2021, has inter alia inserted the provisions of section 206AB of the Act with effect from July 1, 2021. The provisions of section 206AB of the Act require the deductor to deduct tax at higher rate being twice the rate specified in the under the provision of the Act i.e. 20% of the amount paid/ credited to 'specified person'.

As per Central Board of Direct Taxes vide Circular No. 11 of 2021 dated 21st June 2021, for determining TDS rate on Dividend, the Company will be using functionality of the Income-tax department to determine the applicability of Section 206AB of the Act.

Kindly note that the documents as mentioned in the Table 1 and 2 above are required to be emailed to email ID of our Registrar and Share Transfer Agents, i.e. M/s Niche Technologies Private Limited at [nichetechpl@nichetechpl.com](mailto:nichetechpl@nichetechpl.com) with copy marked to [pilani@pilaniinvestment.com](mailto:pilani@pilaniinvestment.com) in order to enable the Company to determine and deduct appropriate TDS / withholding tax rate. No communication/documents on the tax determination / deduction shall be considered post 5.00 P.M (IST) of 16<sup>th</sup> August, 2024.

**No claim shall lie against the Company for such taxes deducted.**

Credit of TDS will be available for verification in Form 26AS to those shareholders who have registered valid PAN as above, which can be downloaded from their e-filing account at <https://incometax.gov.in>.

It may be further noted that in case the tax on the Dividend, is deducted at a higher rate in absence of receipt of the aforementioned details/documents from you, shareholder have an option to file the return of income and claim an appropriate refund, if eligible.

We request your cooperation in this regard.

Thanking you,

Yours faithfully,  
For **Pilani Investment and Industries Corporation Limited**  
Sd/-  
**R. S. Kashyap**  
**Company Secretary**  
**FCS-8588**

Place: Kolkata  
Date: 24.06.2024

*Encl: As stated above*

Click here to download - Form 15G  
Click here to download - Form 15H  
Click here to download - Self declaration(s)

*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 own tax consultant with respect to specific tax implications arising out of receipt of dividend.*

# INCOME-TAX RULES, 1962

## FORM NO. 15G

[See section 197A (1), 197A (1A) and rule 29C]

### Declaration under section 197A (1) and section 197A (1A) to be made by an individual or a person (not being a company or firm) claiming certain incomes without deduction of tax PART I

Name of the Company		Folio No. / DP id Client id / FDR No.		
1. Name of Assessee (Declarant)		2. PAN of the Assessee <sup>1</sup> SELF ATTESTED COPY of valid PAN Card to be attached		
3. Status <sup>2</sup>	4. Previous year(P.Y.) <sup>3</sup> 2022-23 (for which declaration is being made)	5. Residential Status <sup>4</sup>		
6. Flat/Door/Block No.	7. Name of Premises	8. Road/Street/Lane	9. Area /Locality	
10. Town / City / District	11. State	12. PIN	13. Email	
14. Telephone No. (with STD Code) and Mobile No.	15 (a) Whether assessed to tax under the Income-tax Act, 1961 <sup>5</sup> : (b) If yes, latest assessment year for which assessed			
		Yes	No	
		<input type="checkbox"/>	<input type="checkbox"/>	
16. Estimated income for which this declaration is made		17. Estimated total income of the P.Y. in which income mentioned in column 16 to be included <sup>6</sup>		
18. Details of Form No. 15G other than this form filed during the previous year, if any <sup>7</sup>				
Total No. of Form No. 15G filed		Aggregate amount of income for which Form No. 15G .filed		
19. Details of income for which the declaration is filed				
Sl. No.	Identification number of relevant investment/account, etc. <sup>8</sup>	Nature of income	Section under which tax is deductible	Amount of income

.....  
*Signature of the Declarant*<sup>9</sup>

#### Declaration/ Verification<sup>10</sup>

\*I/We ..... do hereby declare that to the best of \*my/our knowledge and belief what is stated above is correct, complete and is truly stated. \*I/ We declare that the incomes referred to in this form are not includible in the total income of any other person under sections 60 to 64 of the Income-tax Act, 1961.\*I/We further declare that the tax \*on my/our estimated total income including \*income/incomes referred to in column 16\*and aggregate amount of \*income/incomes referred to in column 18 computed in accordance with the provisions of the Income-tax Act, 1961, for the previous year ending on..... relevant to the assessment year..... will be nil. \*I/We also declare that \*my/our \*income / incomes referred to in column 16\* and the aggregate amount of \*income / incomes referred to in column 18 for the previous year ending on..... relevant to the assessment year..... will not exceed the maximum amount which is not chargeable to income-tax.

Place: .....

Date:..... *Signature of the Declarant*<sup>9</sup>

1. Substituted by IT (Fourteenth Amdt.) Rules 2015, w.e.f. **1-10-2015**. Earlier Form No. 15G was inserted by the IT (Fifth Amdt.) Rules, 1982, w.e.f. 21-6-1982 and later on amended by the IT (Fifth Amdt.) Rules, 1989, w.r.e.f. 1-4-1988, IT (Fourteenth Amdt.) Rules, 1990, w.e.f. 20-11-1990 and IT (Twelfth Amdt.) Rules, 2002, w.e.f. 21-6-2002 and substituted by the IT (Eighth Amdt.) Rules, 2003, w.e.f. 9-6-2003 and IT (Second Amdt.) Rules, 2013, w.e.f. 19-2-2013.

PART II

**[To be filled by the person responsible for paying the income referred to in column 16 of Part I]**

1. Name of the person responsible for paying		2. Unique Identification No. <sup>11</sup>	
3. PAN of the person responsible for paying	4. Complete Address		5. TAN of the person responsible for paying
6. Email	7. Telephone No. (with STD Code) and Mobile No.		8. Amount of Income paid <sup>6</sup>
9. Date on which Declaration is received (DD/MM/YYYY)		10. Date on which the income has been paid /credited (DD/MM/YYYY)	

Place: .....

Date: .....

.....

*Signature of the person responsible for paying  
the income referred to in column 16 of Part I*

\*Delete whichever is not applicable.

<sup>1</sup>As per provisions of section 206AA(2), the declaration under section 197A(1) or 197A(1A) shall be invalid if the declarant fails to furnish his valid Permanent Account Number (PAN).

<sup>2</sup>Declaration can be furnished by an individual under section 197 A(1) and a person (other than a company or a firm) under section 197A(1A).

<sup>3</sup>The financial year to which the income pertains.

<sup>4</sup>Please mention the residential status as per the provisions of section 6 of the Income-tax Act, 1961.

<sup>5</sup>Please mention "Yes" if assessed to tax under the provisions of Income-tax Act, 1961 for any of the assessment year out of six assessment years preceding the year in which the declaration is filed.

<sup>6</sup>Please mention the amount of estimated total income of the previous year for which the declaration is filed including the amount of income for which this declaration is made.

<sup>7</sup>In case any declaration(s) in Form No. 15G is filed before filing this declaration(s) during the previous year, mention the total number of such Form No. 15G filed along with the aggregate amount of income for which said declaration(s) have been filed.

<sup>8</sup>Mention the distinctive number of shares, account number of term deposit, recurring deposit, National Savings Schemes, life insurance policy number, employee code, etc.

<sup>9</sup>Indicate the capacity in which the declaration is furnished on behalf of a HUF, AOP, etc.

<sup>10</sup>Before signing the declaration/verification, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under section 277 of the Income-tax Act, 1961 and on conviction be punishable-

- (i) in a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine;
- (ii) in any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine.

<sup>11</sup>The person responsible for paying the income referred to in column 16 of Part I shall allot a unique identification number to all the Form No. 15G received by him during a quarter of the financial year and report this reference number along with the particulars prescribed in rule 3 1A (4) (vii) of the Income-tax

Rules, 1962 in the TDS statement furnished for the same quarter. In ease the person has also received Form No.15H during the same quarter, please allot separate series of serial number for Form No.15G and Form No.15H.

<sup>12</sup>The person responsible for paying the income referred to in column 16 of Part I shall not accept the declaration where the amount of income of the nature referred to in sub-section (1) or sub-section (1A) of section 197A or the aggregate of the amounts of such income credited or paid or likely to be credited or paid during the previous year in which such income is to be included exceeds the maximum amount which is not chargeable to tax. For deciding the eligibility, he is required to verify income or the aggregate amount of incomes, as the ease may be, reported by the declarant in columns 16 and 18.

**1FORM NO. 15H**

[See section 197A(1C) and rule 29C]

**Declaration under section 197A(1C) to be made by an individual who is of the age of sixty years or more claiming certain incomes without deduction of tax.****PART I**

Name of the Company		Folio No./ DP id Client id/ FDR No.			
1. Name of Assessee (Declarant)		2. Permanent Account Number or Aadhaar Number of the Assessee <sup>1</sup> <b>SELF ATTESTED COPY of valid PAN Card to be attached</b>		3. Date of Birth <sup>2</sup> (DD/MM/YYYY)	
4. Previous year(P.Y.) <sup>3</sup> (for which declaration is being made)		5. Flat/Door/Block No.		6. Name of Premises	
2022-23					
7. Road/Street/Lane		8. Area/Locality	9. Town/City/District		10. State
11. PIN	12. Email		13. Telephone No. (with STD Code) and Mobile No.		
14 (a) Whether assessed to tax <sup>4</sup> :				Yes	No
( b ) If yes, latest assessment year for which assessed					
15. Estimated income for which this declaration is made					
16. Estimated total income of the P.Y. in which income mentioned in column 15 to be included <sup>5</sup>					
17. Details of Form No.15H other than this form filed for the previous year, if any <sup>6</sup>					
Total No. of Form No.15H filed		Aggregate amount of income for which Form No. 15H filed			
18. Details of income for which the declaration is filed					
Sl. No.	Identification number of relevant investment/account, etc. <sup>7</sup>	Nature of income	Section under which tax is deductible	Amount of income	

.....  
Signature of the Declarant

1.Substituted by IT (Fourteenth Amdt.) Rules 2015, w.e.f. **1-10-2015**. Earlier Form No. 15H was amended by the IT (Fifth Amdt.) Rules, 1982, w.e.f. 21-6-1982, IT (Fifth Amdt.) Rules, 1989, w.r.e.f. 1-4-1988, IT (Fourteenth Amdt.) Rules, 1990, w.e.f. 20-11-1990, IT (Twelfth Amdt.) Rules, 1992, w.e.f. 1-6-1992, IT (Seventh Amdt.) Rules, 1995, w.e.f. 1-7-1995, IT (Thirty-second Amdt.) Rules, 1999, w.e.f. 19-11-1999, IT (Twelfth Amdt.) Rules, 2002, w.e.f. 21-6-2002, IT (Eighth Amdt.) Rules, 2003, w.e.f. 9-6-2003, IT (Fourteenth Amdt.) Rules, 2003, w.e.f. 1-8-2003, w.e.f. 1-8-2003 and IT (Second Amdt.) Rules, 2013, w.e.f. 19-2-2013

**Declaration/Verification** <sup>8</sup>

I ..... do hereby declare that I am resident in India within the meaning of section 6 of the Income-tax Act, 1961. I also hereby declare that to the best of my knowledge and belief what is stated above is correct, complete and is truly stated and that the incomes referred to in this form are not includible in the total income of any other person under sections 60 to 64 of the Income-tax Act, 1961. I further declare that the tax on my estimated total income including \*income/incomes referred to in column 15 \*and aggregate amount of \*income/incomes referred to in column 17 computed in accordance with the provisions of the Income-tax Act, 1961, for the previous year ending on..... relevant to the assessment year ..... will be *nil*.

*Place:* .....

.....

*Date:* .....

*Signature of the Declarant*

## PART II

[To be filled by the person responsible for paying the income referred to in column 15 of Part I]

1. Name of the person responsible for paying		2. Unique Identification No. <sup>9</sup>	
3. Permanent Account Number or Aadhaar Number of the person responsible for paying	4. Complete Address		5. TAN of the person responsible for paying
6. Email	7. Telephone No. (with STD Code) and Mobile No.		8. Amount of income paid <sup>10</sup>
9. Date on which Declaration is received (DD/MM/YYYY)		10. Date on which the income has been paid/credited (DD/MM/YYYY)	

Place: .....

Date: .....

.....

*Signature of the person responsible for paying the income referred to in column 15 of Part I \**

\*Delete whichever is not applicable.

1. As per provisions of section 206AA(2), the declaration under section 197A(1C) shall be invalid if the declarant fails to furnish his valid Permanent Account Number or Aadhaar Number.
2. Declaration can be furnished by a resident individual who is of the age of 60 years or more at any time during the previous year.
3. The financial year to which the income pertains.
4. Please mention "Yes" if assessed to tax under the provisions of Income-tax Act, 1961 for any of the assessment year out of six assessment years preceding the year in which the declaration is filed.
5. Please mention the amount of estimated total income of the previous year for which the declaration is filed including the amount of income for which this declaration is made.
6. In case any declaration(s) in Form No. 15H is filed before filing this declaration during the previous year, mention the total number of such Form No. 15H filed along with the aggregate amount of income for which said declaration(s) have been filed.
7. Mention the distinctive number of shares, account number of term deposit, recurring deposit, National Savings Schemes, life insurance policy number, employee code, etc.
8. Before signing the declaration/verification, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under section 277 of the Income-tax Act, 1961 and on conviction be punishable—

- (i) in a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine;
- (ii) in any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine.

9. The person responsible for paying the income referred to in column 15 of Part I shall allot a unique identification number to all the Form No. 15H received by him during a quarter of the financial year and report this reference number along with the particulars prescribed in rule 31A(4)(vii) of the Income-tax Rules, 1962 in the TDS statement furnished for the same quarter. In case the person has also received Form No.15G during the same quarter, please allot separate series of serial number for Form No.15H and Form No.15G.

10. The person responsible for paying the income referred to in column 15 of Part I shall not accept the declaration where the amount of income of the nature referred to in section 197A(1C) or the aggregate of the amounts of such income credited or paid or likely to be credited or paid during the previous year in which such income is to be included exceeds the maximum amount which is not chargeable to tax after allowing for deduction(s) under Chapter VI-A, if any, or set off of loss, if any, under the head “income from house property” for which the declarant is eligible. For deciding the eligibility, he is required to verify income or the aggregate amount of incomes, as the case may be, reported by the declarant in columns 15 and 17.

<sup>1</sup> **[Provided** that such person shall accept the declaration in a case where income of the assessee, who is eligible for rebate of income-tax under section 87A, is higher than the income for which declaration can be accepted as per this note, but his tax liability shall be nil after taking into account the rebate available to him under the said section 87A.]

Date:

Pilani Investment and Industries Corporation Limited  
Birla Building, 11<sup>th</sup> Floor,  
9/1, R. N. Mukherjee Road,  
Kolkata- 700001

Dear Sir/Madam,

**Re: Declaration regarding Tax Residency and Beneficial Ownership of shares**

**Ref: PAN** – Mention PAN of Shareholder

**Folio Number / DP ID/ Client ID** – Mention all the account details

With reference to the captioned subject, and in relation to the appropriate withholding of taxes on the Dividend payable to me / us by [**PILANI INVESTMENT AND INDUSTRIES CORPORATION LIMITED**] (the Company), I / We hereby declare as under:

1. I / We, <Full name of the shareholder>, holding share/shares of the Company as on the record date, hereby declare that I am /we are tax resident of <country name> for the period April 2024-March 2025 (Indian Fiscal Year) as per tax treaty between India and <country name> (hereinafter referred to as 'said tax treaty').
2. I / We hereby declare that, I am /we are the beneficial owner of the share/shares held in the Company as well as the dividend arising from such shareholding; and 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.
3. I/We confirm that I/We are entitled to claim the benefits under the Treaty as modified by the multilateral convention to implement tax treaty related measures to prevent base erosion and profit shifting (MLI) including but not limited to the Principal Purpose Test (PPT), limitation of benefit clause (LOB), Simplified Limitation of Benefits (SLOB), period of holding of shares etc. as applicable. We specifically confirm that my affair / affairs were not arranged such that the main purpose or the principal purpose thereof was to obtain tax benefits available under the applicable tax treaty.
4. I/We confirm that I/We have not entered into an impermissible avoidance arrangement i.e. an arrangement, the main purpose or one of the main purposes of which is to obtain a tax benefit and it (a) creates rights, or obligations, which are not ordinarily created between persons dealing at arm's length (b) results, directly or indirectly, in the misuse, or abuse, of the provisions of this Act (c) lacks commercial substance or is deemed to lack commercial substance under section 97, in whole or in part; or (d) is entered into, or carried out, by means, or in a manner, which are not ordinarily employed for bona fide purposes.
5. I/We hereby furnish a copy of valid Tax Residency Certificate dated \_\_\_\_\_ having Tax Identification number \_\_\_\_\_ issued by \_\_\_\_\_ along with a copy of Form 10F duly filled and signed for the period April 2023-March 2024.
6. I/We further declare that I/we do not have and will not have any taxable presence, fixed base or Permanent Establishment in India as per the said tax treaty during the period April 2023 – March 2024.
7. If, I /We have any PE or fixed base in India as construed under relevant Articles of the applicable tax treaty but the dividend income receivable by me/us from investment in the shares of the Company is not effectively connected to said permanent establishment in India. Further I/We hereby declare and confirm that I/We do not fall under the definition of 'specified person' as provided in section 206AB of the IT Act

8. I/ We further indemnify the Company for any penal consequences arising out of any acts of commission or omission initiated by the Company by relying on my/ our above averment.

9. I/We hereby confirm that the above declaration should be considered to be applicable for all the shares held in the Company under PAN/ accounts declared in the form.

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.

Thanking you.

Yours faithfully,

For Name of the shareholder

<<insert signature>>

Authorized Signatory - Name and designation

Contact address: \_\_\_\_\_ [Please insert]

Email address: \_\_\_\_\_ [Please insert]

Contact Number: \_\_\_\_\_ [Please insert]

Tax Identification Number \_\_\_\_\_ [Please insert]

*Note: Kindly strikethrough whichever is not applicable*

(\*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)

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.

Date:

Pilani Investment and Industries Corporation Limited  
Birla Building, 11<sup>th</sup> Floor,  
9/1, R. N. Mukherjee Road,  
Kolkata- 700001

**Subject: Declaration regarding Category and Beneficial Ownership of shares**

**Ref: PAN – (Mention PAN of Shareholder)**

**Folio Number / DP ID/ Client ID – (Mention all the account details)**

With reference to the captioned subject, and in relation to the appropriate withholding of taxes on the Dividend payable to me / us by **PILANI INVESTMENT AND INDUSTRIES CORPORATION LIMITED** (the Company), I / We hereby declare as under:

1. I/We, (Full name of the shareholder) \_\_\_\_\_, holding share/shares of the Company as on the record date, hereby declare that I am /we are tax resident of India for the period April 2023-March 2024 (Indian Fiscal Year).
2. I/We hereby declare that (Select Applicable)
  - I am an Individual and has linked the Aadhar number with PAN Card.
  - We are **Insurance Company** and are the beneficial owner of the share/shares held in the Company; and we are submitting self-attested copy of PAN Card.
  - We are **Mutual Fund** specified in Section 10(23D) of the Income Tax Act, 1961 and are the beneficial owner of the share/shares held in the Company; and we are submitting self-attested copy of PAN Card and registration certificate.
  - We are **Alternative Investment fund** established in India and are the beneficial owner of the share/shares held in the Company; and our income is exempt under Section 10(23FBA) of the Act and are governed by SEBI regulations as Category I or Category IIAIF; and we are submitting self-attested copy of the PAN card and registration certificate.
  - We are **New Pension System Trust** established in India and are the beneficial owner of the share/shares held in the Company; and our income is exempt under Section 10(44) of the Act and being regulated by the provisions of the Indian Trusts Act, 1882 and are therefore covered under 197A(1E) of the Act; and we are submitting self-attested copy of the PAN card and registration certificate, as applicable.
  - We are **business trust** as defined in clause (13A) of section 2, by a special purpose vehicle referred to in the Explanation to clause (23FC) of section 10 and therefore the provisions of Section 194 are not applicable; and are the beneficial owner of the share/shares held in the Company; and we are submitting self-attested copy of PAN Card and registration certificate.

We are (*category of the entity/Corporation established under by or under a Central Act*) and are the beneficial owner of the share/shares held in the Company; and are not subject to withholding tax under section 196 of the Income Tax Act; and we are submitting self-attested copy of the documentary evidence supporting the exemption status along with self-attested copy of PAN card.

We are a **Recognized Provident funds/ Approved Superannuation fund/ Approved Gratuity Fund** established in India and our income is exempt under section 10 of the Income Tax Act and are therefore covered under Circular No. 18/2017 issued by Central Board of Direct Taxes (CBDT); and we are submitting self-attested copy of the PAN card and registration certificate, as applicable.

We declare that in terms of Rule 37BA of Income Tax Rules 1962, dividend income on which tax is liable to be deducted at source is assessable in the hands of a person other than me and to comply with Rule 37BA we are enclosing declaration in Annexure 1.

3. I/ We hereby declare that I/we have duly furnished the return of income for the assessment year relevant to the previous year immediately preceding the financial year in which tax is required to be deducted, for which the time limit for furnishing the return of income under sub-section (1) of section 139 has expired and the aggregate of tax deducted at source and tax collected at source in his case is rupees fifty thousand or more in the said previous year.

Or

I/ We hereby declare that I/we is/are not required to furnish the return of income for the assessment year relevant to the said previous year and is/are notified by the Central Government in the Official Gazette in this behalf.

4. I/We hereby confirm that the above declaration should be considered to be applicable for all the shares held in the Company under PAN/ accounts declared in the form.
5. I/ We further indemnify the Company for any penal consequences arising out of any acts of commission or omission initiated by the Company by relying on my/ our above averment.

Thanking you.

Yours

faithfully,

For *Name of the shareholder*

<<insert signature>>

Authorized Signatory - *Name and designation*

*Note: Kindly strikethrough whichever is not applicable*

Date:

To  
Pilani Investment and Industries Corporation Limited  
Birla Building, 11<sup>th</sup> Floor,  
9/1, R. N. Mukherjee Road,  
Kolkata- 700001

**Sub: Declaration regarding credit for tax deducted at source in terms of section 199 r.w. Rule 37BA(2)**

I, \_\_\_\_\_(Name, address and PAN of the deductee as per Rule 37BA);  
in the capacity of \_\_\_\_\_; hereby declare that:

- a) The dividend distributed/ paid or to be distributed or paid by Pilani Investment and Industries Corporation Limited (the Company) for the year ended 31st March, 2024 in respect of \_\_\_shares held by (Name of the Shareholder) bearing Folio No. \_\_\_\_\_ to \_\_\_\_\_ is assessable in the hands of \_\_\_\_\_ (Specify Name and Address of the Person in whose hands dividend is assessable) having PAN \_\_\_\_\_(Specify PAN of the said person in whose hands dividend is assessed and attached a copy whereof) in view of \_\_\_\_\_(Specify the reason for giving credit to such person).
- b) Accordingly, credit for tax deducted at source in respect of dividend income is required to be given in the name of \_\_\_\_\_. (Specify Name and PAN of the Person in whose hands dividend is assessable i.e., to whom credit is to be given)
- c) In view of the same, I request the Company to give credit of tax deducted at source of the Act in respect of dividend income distributed/ paid or to be distributed or paid for the year ended 31st March 2024 by issuing certificate for tax deduction at source in the name of the said person.
- d) The above declaration is in terms of Section 199 of the Income-tax Act, 1961 read with Rule 37BA(2) of the Income-tax Rules, 1962 and if based on which tax is deducted at source by the Company it would be in due compliance of law by the Company.

Verification

I..... do hereby declare that to the best of my knowledge and belief what is stated above is correct complete and is truly stated.

Verified today the ..... day of. ....

Name and Signature of the person providing the information

Place: .....

**Procedure to file application for Form 10F online on Income Tax Portal In case of shareholder having PAN**

<b>Steps</b>	<b>Description</b>
1	Login to e-filing website ( <a href="https://eportal.incometax.gov.in/iec/foervices/#!/login">https://eportal.incometax.gov.in/iec/foervices/#!/login</a> ) using the PAN Login
2	Select E-file tab, then select Income Tax Forms and select the option File income tax forms
3	Select tab “Person not dependent on any source of Income (Source of Income not relevant)”
4	Select Form 10F
5	From the dropdown provided, select the relevant Assessment Year for which Form 10F is to be filed and then click on continue
6	Fill all the required details in the Form
7	Attach the Tax Residency Certificate and Save the Draft and then Proceed to submit the Form with digital signature (DSC) of the authorized signatory.
8	After the form is filed, go to view filed form, download the copy of Form 10F filed for the relevant AY and submit the same to company alongwith relevant tax details/documents.

**In case of shareholder not having PAN**

<b>Steps</b>	<b>Description</b>
1	Visit the e-filing web portal at <a href="https://eportal.incometax.gov.in/">https://eportal.incometax.gov.in/</a> and click on “Register” located in the top right corner of the web page.
2	Select “Others” and then choose “Non-residents not holding and not required to have PAN” from the dropdown menu.
3	Fill in the required information, including your full name, date of incorporation/birth, tax identification number, and country of residence.
4	Provide the details of the key person, including their name, date of birth, tax identification number, and designation.
5	Offer contact details for the key person and provide a secondary email and contact details. Please note that you’ll receive a one-time password (OTP) on your primary mobile number and email ID.
6	Attach the Tax Residency Certificate and submit.