Information of Tax on Interim Dividend 2023-24

Dividend

The Board of Directors Meeting scheduled to be held on 13.02.2024 shall consider the proposal of declaration of interim dividend, if any, for the financial year 2023-24, to the equity shareholders of the Company.

We wish to inform that pursuant to Regulation 42 of SEBI Listing Regulations, **Friday, February 23,2024**, is fixed as the record date for ascertaining the eligibility of shareholders of the Company, to receive the interim dividend, if declared by the Board of Directors at its meeting.

Pursuant to the changes introduced in the Finance Act 2020, w.e.f. April 1, 2020, the Company would be required to withhold taxes at the prescribed rates on the dividend paid to its shareholders. The withholding tax rate would vary depending on the residential status of the shareholder and the documents submitted by them and accepted by the Company. Accordingly, the above-referred Dividend will be paid after deducting the tax at source as follows:

Particulars	Applicable	Documents required (if any)- Please submit with
	withholdin	details of DPID – Client Id/ Folio No.
	g tax Rate	
If PAN registered	10%*	Update the PAN, if not already done, with the
(In accordance with Section		depositories (in case of shares held in demat mode) and
194 of the I.T. Act)	(Note-1)	with the Company's Registrar and Transfer
		Agents(RTA)–M/s.Integrated Registry Management
		Services Pvt Ltd, Bengaluru (in case of shares held in
		physical mode).
If PAN not registered/ Invalid	20%*	Tax is required to be deducted at source under Section
PAN registered	(Note-1)	194 of the IT Act, at 10% on the amount of dividend
		where shareholder(s) have registered their valid
		Permanent Account Number (PAN) and at a rate of 20%
		for cases wherein:
		a) the shareholder(s) do not have PAN / have not
		registered their valid PAN details in their account.

Table 1 : Resident Shareholders

Particulars	Applicable	Documents required (if any)- Please submit with
	withholdin	details of DPID – Client Id/ Folio No.
	g tax Rate	
		b) the shareholder(s) have not linked their Aadhaar
		with their PAN, rendering the PAN as invalid
		c) is a "specified person" as per Section 206AB of the
		Act (Note-5)
Submission of declaration in	NIL	Fresh declaration in Form No. 15G(applicable to any
Form 15G/ Form 15H by		person other than a company or a firm) / Form 15H
Individual resident		(applicable to an Individual who is 60 years and more),
shareholders		along with self-attested copy of the PAN linked to
		Aadhar, fulfilling certain conditions @
		Please download Form 15G / 15H from the Income Tax
		website www.incometaxindia.gov.in
		https://incometaxindia.gov.in/forms/income-tax%20rules/103120000000007845.pdf
		https://incometaxindia.gov.in/forms/income-tax%20rules/10312000000007846.pdf
		or
		https://www.integratedindia.in/Downloads/Dr/Form_15G.pdf
		https://www.integratedindia.in/Downloads/Dr/Form 15H.pdf
		@A fresh declaration in Form No. 15G/15H, as the case
		may be furnished, to the Company to the effect that the
		tax on the estimated total income of the FY 2023-2024
		after including the income on which tax is to be deducted,
		will be NIL.
Submitting Order under	Rate	Submit certificate obtained from tax authority for
Section 197 of the Income	provided in	Lower/NIL withholding tax
Tax Act, 1961 (Act)	the Order.	
	(a	
	(Note-8)	
Persons for whom Section	NIL	-Documentary evidence that the said provisions u/s 194
194 of the Act is not		are not applicable.
applicable (e.g. LIC, GIC)		

Particulars	Applicable	Documents required (if any)- Please submit with
	withholdin	details of DPID – Client Id/ Folio No.
	g tax Rate	
		-a declaration that it has full beneficial interest with
		respect to the shares owned by it along with PAN
Persons Covered under	NIL	Documentary evidence that the person is covered under
Section 196 of the Act (e.g.		said Section 196 of the Act.
Mutual Funds, Govt.)		
		Mutual Funds:
		(i) Self-declaration that they are specified in Section 10
		(23D) of the Income Tax Act, 1961 along with self-
		attested copy of PAN card and registration certificate.
		(ii) Also certificate that payment of by way of dividend in
		respect of any securities or shares are owned by it or in
		which it has full beneficial interest.
Category - I & II Alternative	NIL	AIF established/incorporated in India - Self-declaration
Investment Funds (AIF)		that its income is exempt under Section 10 (23FBA) of
registered with SEBI		the Income Tax Act, 1961 and they are governed by
		SEBI regulations as Category I or Category II AIF along
		with self-attested copy of the PAN card and registration
		certificate.
New Pension System (NPS)	NIL	Self-declaration that it qualifies as NPS trust and income
		is eligible for exemption under section 10(44) of the Act
		and being regulated by the provisions of the Indian
		Trusts Act, 1882 along with self-attested copy of the PAN
		card.

Table 2: Non-Resident Shareholders:

Particulars	Applicable withholding tax Rate	Documents required (if any)- Please submit with details of DPID – Client Id/ Folio No.
Non-resident	20% (plus	In order to apply the Tax Treaty rate, following documents
shareholders	applicable	would be required:
[including	surcharge	1. Self-attested copy of Indian Tax Identification number
Foreign	and cess)	Permanent Account Number (PAN), if available
Investors (FIIs) / Foreign	(Note-6)	2. Tax Residency Certificate (TRC) (of FY 2023-24 or later) obtained from the tax authorities of the country of which
Portfolio Investors	OR	the shareholder is a resident.
(FPIs)]	Tax Treaty Rate**	 Completed and duly e-filed Form 10F and acknowledgment number. Click here to download Form 10F (Note-4)
	(Note-3)	https://incometaxindia.gov.in/forms/income- tax%20rules/10312000000007197.pdf
	(whichever is lower)	 4. Self-declaration (of FY 2023-24 or later) from Non-resident, primarily covering the following: Non-resident is eligible to claim the benefit of respective tax treaty. Non-resident receiving the dividend income is the beneficial owner of such income Dividend income is not attributable / effectively connected to any Permanent Establishment (PE) or Fixed Base in India
		Click here to download Self Declaration format https://www.bosch.in/media/our_company/shareholder_inf ormation/2024/foreigncorporateshareholdersnopeandbenef icialownershipdeclarationint2024.pdf
		https://www.bosch.in/media/our_company/shareholder_inf ormation/2024/noncorporatenopeandbeneficialownershipd eclaration_int12024.pdf
		5. In case of Foreign Institutional Investors, Foreign Portfolio Investors, self-attested copy of certificate of registration accorded under the relevant regulations of the SEBI.
		 Self-declaration regarding 'Principle Purpose Test' (if any) as applicable to respective Treaty.
		7. In case of shareholder being tax resident of Singapore, please furnish the letter issued by the competent authority or any other evidence demonstrating the non- applicability of Article 24 - Limitation of Relief under

Particulars	Applicable withholding tax Rate	Documents required (if any)- Please submit with details of DPID – Client Id/ Folio No.
		India-Singapore Double Taxation Avoidance Agreement (DTAA).
Submitting Order u/s 197 (i.e. lower or NIL withholding tax certificate)	Rate provided in the Order	Lower/NIL withholding tax certificate obtained from tax authority.

Notes:

- (1) *Notwithstanding the above, tax would not be deducted on payment of dividend to resident Individual shareholder, if total dividend to be paid in FY 2023-24 does not exceed Rs. 5,000. In this regard, please note that the Company has paid dividend of ₹ 280/- per equity share having nominal value of ₹ 10/- for the financial year ended March 31, 2023, during the current financial year, i.e. financial year 2023-24. Accordingly, considering the interim dividend as mentioned hereinabove in the financial year 2023-24, if the aggregate dividend pay-out exceeds ₹ 5,000/-, then the tax will be deducted on the current as well as on the earlier amount of dividend and accordingly, the balance amount of the dividend will be paid to the concerned individual shareholder.
- (2) In terms of Rule 37BA of 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 deductee should file declaration with the Company on or before 20.02.2024 in manner prescribed by Rules. The aforesaid declaration shall contain (i) name, address, PAN, and residential status of the person to whom credit is to be given; (ii) payment in relation to which credit is to be given; and (iii) the reason for giving credit to such person.
- (3) **Further, as per Section 90 of the Act the Non-resident shareholder has the option to be governed by the provisions of the Double Tax Avoidance Agreement (tax treaty) between India and the country of tax residence of the shareholder read with provisions laid down in Multilateral Instrument, wherever applicable. For this purpose, i.e. to avail Tax Treaty benefits, the non-resident shareholder will have to provide documents as specified above.

Kindly note that the Company is not obligated to apply the beneficial Tax Treaty rates at the time of tax deduction/withholding on dividend amounts. Application of beneficial Tax

Treaty Rate shall depend upon the completeness of the documents submitted by the Non-Resident shareholder and review to the satisfaction of the Company.

- (4) Form 10F: Non-resident shareholders are required to furnish Form 10F electronically on income tax portal.
- (5) <u>TDS to be deducted at higher rate in case of non-filers of Return of Income</u> The provisions of Section 206AB require the deductor to deduct tax at higher of the following rates from amount paid/ credited to specified person:
 - i. At twice the rate specified in the relevant provision of the Act; or
 - ii. At twice the rates or rates in force; or
 - iii. At the rate of 5%

The 'specified person' means a person who has:

a) not filed 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 of filing return of income under sub-section (1) of Section 139 has expired; and

b) to the aggregate of tax deduction/collection at source in aggregate amounting to Rs. 50,000 or more in that previous year.

Where sections 206AA and 206AB are applicable i.e. the specified person has not submitted the PAN as well as not filed the return; the tax shall be deducted at higher of two rates prescribed in these two sections.

As per Central Board of Direct Taxes vide Circular No. 11 of 2021 dated June 21, 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.

The non-resident who does not have the permanent establishment is excluded from the scope of a specified person.

(6) Tax shall be deducted at source @10% (plus applicable surcharge and cess) on dividend paid to 'specified fund' as defined in clause (c) of the Explanation to clause (4D) of section 10, in accordance with the provisions of section 196D of the Act.

- (7) Shareholders who are exempted from TDS provisions through any circular or notification may provide documentary evidence in relation to the same, to enable the Company in applying the appropriate TDS on Dividend payment to such shareholder.
- (8) Lower deduction Certificate u/s 197 of the Act may be obtained under TAN of the Company i.e., BLRM01746D.
- (9) 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.
- (10) The Company with M/s. Integrated Registry Management Services Pvt Ltd, Company's Registrar and Transfer Agent has enabled a shareholder web portal for submission of tax exemption forms/requested documents. Shareholders can submit their tax exemption forms and supporting documents directly on portal for purposes of tax deduction at source by Clicking the below link and selecting 'Bosch Limited' in the company drop down https://www.integratedindia.in/ExemptionFormSubmission.

We request shareholders to upload the relevant documents at aforementioned link on or before **20.02.2024**. No communication on the tax determination/deduction received post **20.02.2024** shall be considered for payment of dividend.

- (11) For withholding of taxes as mentioned above, the residential status of the shareholders will be considered as per the data available with the Company/RTA/the Depository Participants (the "DPs"). In case there is change in their status, then the shareholders are requested to update their current status with the Company/RTA/the DPs.
- (12) If the tax on said Dividend is deducted at a higher rate in absence of receipt of or satisfactory completeness of the aforementioned details/documents, the shareholder may claim an appropriate refund in the return of income filed with their respective Tax authorities, if eligible. No claim shall lie against the Company for such taxes deducted.

(13) The Company will arrange to email a soft copy of the TDS certificate at the shareholders registered email ID, post payment of the said dividend. Shareholders will also be able to see the credit of TDS in Form 26AS, which can be downloaded from their e-filing account at https://www.incometax.gov.in/iec/foportal.

In case of any queries, the Shareholders may write to :		
V Srinivasan,	Registrar and Transfer Agent (RTA)	
Company Secretary		
Bosch Ltd	Integrated Registry Management Services Pvt Ltd	
Dept: BCS	Unit: Bosch Ltd	
Hosur Road, Adugodi	30, Ramana Residency, 4 th Cross	
Bengaluru-560030	Malleswaram, Bengaluru- 560030	
E-mail:	E-mail : giri@integratedindia.in	
Secretarial.corp@in.bosch.com	Tel: 080 23460815-818	
Tel: 080 6752 3878		

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 investors are advised to consult their own tax consultant with respect to specific tax implications arising out of receipt of dividend.