

Information of Tax on Final Dividend 2023-24

Dividend

The Board of Directors at their Meeting held on 24.05.2024 have recommended final Dividend of Rs.170/- per Equity Share of the face value of Rs. 10/- each for the financial year ended 31.03.2024, subject to approval of the shareholders at the ensuing 72nd Annual General Meeting of the Company scheduled to be held on 07.08.2024. Register of Members & Share Transfers of the Company will be closed from 20.07.2024 to 07.08.2024 (both days inclusive)

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:

Table 1: Resident Shareholders

Particulars	Applicable withholding tax Rate	Documents required (if any)- Please submit with details of DPID – Client Id/ Folio No.
If PAN registered (In accordance with Section 194 of the I.T. Act)	10%* (Note-1)	Update the PAN, if not already done, with the depositories (in case of shares held in demat mode) and 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 PAN registered	20%* (Note-1)	Tax is required to be deducted at source under Section 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. 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-4)
Submission of declaration in Form 15G/ Form 15H by Individual resident shareholders	NIL	Declaration in Form No. 15G (applicable to any person other than a company or a firm) / Form 15H (applicable to an Individual who is 60 years and more), along with self-attested copy of the PAN linked to Aadhar, fulfilling certain conditions.@ Please download Form 15G / 15H from the Income Tax website https://incometaxindia.gov.in/Pages/default.aspx https://incometaxindia.gov.in/forms/income-tax%20rules/10312000000007845.pdf https://incometaxindia.gov.in/forms/income-tax%20rules/10312000000007846.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 2024-2025 after including the income on which tax is to be deducted, will be NIL.

Particulars	Applicable withholding tax Rate	Documents required (if any)- Please submit with details of DPID – Client Id/ Folio No.
Benefit under Rule 37BA (2)	Rates based on the status of the beneficial owners. (Note-2)	In case where shares are held by Clearing Member/ intermediaries/ Stockbrokers and TDS is to be applied by the Company in the PAN of the beneficial shareholders, then intermediaries/ stockbrokers and beneficial shareholders will have to provide a declaration.
Click here to download the declaration under Rule 37BA(2) of the Income Tax Rules,1962: https://www.bosch.in/media/our_company/shareholder_information/2024/declaration_under_rule_37ba2.pdf		
Submitting Order under Section 197 of the Income Tax Act, 1961 (Act)	Rate provided in the Order. (Note-7)	Submit certificate obtained from tax authority for Lower/NIL withholding tax
Persons for whom Section 194 of the Act is not applicable (e.g. LIC, GIC)	NIL	-Documentary evidence that the said provisions u/s 194 are not applicable. -a declaration that it has full beneficial interest with respect to the shares owned by it along with PAN
Persons Covered under Section 196 of the Act (e.g. Mutual Funds, Govt.)	NIL	Documentary evidence that the person is covered under said Section 196 of the Act. 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 Investment Funds (AIF) registered with SEBI	NIL	AIF established/incorporated in India - Self-declaration that its income is exempt under Section 10 (23FBA) of 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.
<p>Non-resident shareholders [including Foreign Institutional Investors (FIIs) / Foreign Portfolio Investors (FPIs)]</p>	<p>20% (plus applicable surcharge and cess) (Note-5)</p> <p>OR</p> <p>Tax Treaty Rate**</p> <p>(Note-3)</p> <p>(Whichever is lower)</p>	<p>In order to apply the Tax Treaty rate, following documents would be required:</p> <ol style="list-style-type: none"> 1. Self-attested copy of Indian Tax Identification number Permanent Account Number (PAN), if available 2. Tax Residency Certificate (TRC) (of FY 2024-25 or Calendar year 2024) obtained from the tax authorities of the country of which the shareholder is a resident 3. E-filed Form 10F (filed electronically on the Indian Income Tax web portal) valid for the period April 2024 to March 2025. (Note-3) Click here to download Form 10F. https://www.bosch.in/media/our_company/shareholder_information/2024/web_form10f-2.pdf 4. Self-declaration (of FY 2024-25 or Calendar year 2024) from Non-resident, primarily covering the following: <ul style="list-style-type: none"> -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 <p>Click here to download Self Declaration format. https://www.bosch.in/media/our_company/shareholder_information/2024/foreigncorporateshareholders_nopeandbeneficialownershipdeclarationjune2024.pdf</p> <p>https://www.bosch.in/media/our_company/shareholder_information/2024/noncorporatenopeandbeneficialownershipdeclarationjune24.pdf</p> 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. 6. 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 India-Singapore Double Taxation Avoidance Agreement (DTAA).

Particulars	Applicable withholding tax Rate	Documents required (if any)- Please submit with details of DPID – Client Id/ Folio No.
Submitting Order u/s 197 (i.e. lower or NIL withholding tax certificate)	Rate provided in the Order. (Note 7)	Lower/NIL withholding tax certificate obtained from tax authority.
Non-Resident Shareholders who are tax residents of Notified Jurisdictional Area as defined under Section 94A(1) of the Act	30%	NA
Sovereign Wealth Funds and Pension funds notified by Central Government under Section 10(23FE) of the Act	NIL	<ul style="list-style-type: none"> • Copy of the notification issued by CBDT substantiating the applicability of Section 10(23FE) of the Act issued by the Government of India. • Self-Declaration that the conditions specified in Section 10(23FE) have been complied with.
Subsidiary of Abu Dhabi Investment Authority (ADIA) as prescribed under Section 10(23FE) of the Act	NIL	<ul style="list-style-type: none"> • Self-Declaration substantiating the fulfilment of conditions prescribed under section 10(23FE) of the Act

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 2024-25 does not exceed Rs. 5,000.**
- (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 15.07.2024** 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.**

In case, PAN is not available, the non-resident Shareholder shall furnish details on letterhead (a) name, (b) email ID, (c) contact number, (d) address in residency country, (e) Tax Identification Number of the residency country.

It is recommended that Shareholders should independently satisfy their eligibility to claim DTAA benefit including fulfilling of all the conditions laid down by DTAA.

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.

Non-resident shareholders are required to furnish Form 10F electronically on income tax portal.

- (4) TDS to be deducted at higher rate in case of non-filers of Return of Income**
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.

- (5) 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.
- (6) 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.
- (7) Lower deduction Certificate u/s 197 of the Act may be obtained under TAN of the Company i.e., BLRM01746D.
- (8) 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.
- (9) 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.integratedregistry.in/TaxExemptionRegistration.aspx>

We request shareholders to upload the relevant documents at aforementioned link on or before **15.07.2024**. No communication on the tax determination/deduction received post **15.07.2024** shall be considered for payment of dividend.

- (10) 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.
- (11) 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.**

- (12) 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, Company Secretary Bosch Ltd Dept: BCS Hosur Road, Adugodi Bengaluru-560030 E-mail: Secretarial.corp@in.bosch.com Tel: 080 6752 3878	Registrar and Transfer Agent (RTA) Integrated Registry Management Services Pvt Ltd Unit: Bosch Ltd 30, Ramana Residency, 4 th Cross Malleswaram, Bengaluru- 560030 E-mail : giri@integratedindia.in Tel: 080 23460815-818

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