



GOCL Corporation Limited

CIN: L24292TG1961PLC000876

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Dear Member(s),

We are pleased to inform you that the Board of Directors of GOCL Corporation Limited in its meeting held on Tuesday, 30th May 2023 recommended a Dividend of Rs. 5.00 per share (250%) for the financial year 2022-23 and a Special Dividend of Rs. 5.00 per share (250%), totalling to a Dividend of Rs.10.00 per share (500%). This dividend, if approved by the Shareholders at the ensuing Annual General Meeting, will be paid to all the Shareholders of the Company whose names appear on the Register of Members / Beneficiary details received from the Depositories as at the date of Book Closure.

As you are aware, as per the Income-tax Act, 1961 (Act), as amended by the Finance Act, 2020, dividends declared, distributed or paid by the Company on or after 1st April 2020, shall be taxable in the hands of the Members and the Company shall be required to deduct tax at source (TDS) at the prescribed rates from the dividend to be paid to such Members.

The TDS rate would depend on the residential status of the Members, eligibility of non-resident shareholders to claim the benefit of relevant Double Taxation Avoidance Agreement and basis the documents submitted and accepted by the Company. Accordingly, the Dividend will be paid after deducting TDS as provided below.

All Members are requested to ensure that the below details are completed and/or updated, as applicable, in their respective Demat account(s) maintained with the Depository participant(s); or in case of shares held in physical form, with the Company, on or before the commencement of book closure from **Friday, September 15, 2023 to Thursday, September 21, 2023**.

Members are requested to take note of the TDS rates and document(s), if any, required to be submitted to the Company by end of day, **Thursday, September 14, 2023** for their respective category, in order to comply with the applicable TDS provisions.

1. FOR RESIDENT SHAREHOLDERS: For resident shareholders, generally, the tax will be deducted at source under Section 194 of the Act @ 10% (Refer note below) on the amount of dividend, provided a valid Permanent Account Number ('PAN') is provided by the shareholder. If PAN is not submitted, tax would be deducted @ 20% as per Section 206AA of the Act.

1. **Resident individual shareholders:** No tax shall be deducted on the dividend payable to resident individuals, if,
 - a. Total dividend to be distributed or paid or likely to be distributed or paid by the Company to the shareholder during the Financial Year 2023-24 does not exceed Rs. 5,000/-.

- b. The shareholder provides a written declaration in prescribed Form 15G (applicable to any person other than a Company or a Firm) / Form 15H (applicable to an Individual above the age of 60 years), subject to eligibility conditions being met. As per Section 206AA of the Act, the declaration would not be valid if it does not contain PAN of the person making the declaration. If the recipient makes a declaration without his / her PAN, TDS would be deducted @ 20% as per Section 206AA of the Act.

Blank Form 15G and 15H can be downloaded from the website of the Company viz. click on <https://goicorp.com/#INVESTORINFO>

2. Resident Shareholders other than individuals: In case of a certain class of resident shareholders other than individuals who are covered under provisions of Section 194 or Section 196 or Section 197A of the Act, no tax shall be deducted at source ('nil rate'), provided sufficient documentary evidence thereof, along with exemption notification, if any, as per the relevant provisions of the Act, to the satisfaction of the Company, is submitted. This illustratively includes providing the following:

- a. **Insurance Companies:** Public & other insurance companies: a declaration that it has a full beneficial interest with respect to the shares owned by it along with a self-attested copy of PAN card.
- b. **Mutual Funds:** Self-declaration that they are specified and covered under Section 10 (23D) of the Act along with a self-attested copy of PAN card and registration certificate.
- c. **AIF established/incorporated in India** - Self-declaration that its income is exempt under Section 10 (23FBA) of the Act and they are governed by SEBI Regulations as Category I or Category II AIF along with a self-attested copy of the PAN card and registration certificate.
- d. 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: Self-declaration specifying the specific Central Act under which such corporation is established and that their income is exempt under the provisions of the Act along with a self-attested copy of the PAN card and registration certificate.
- e. Other Resident Non-Individual Shareholders: Shareholders who are exempted from the provisions of TDS as per Section 194 of the Act and who are covered under Section 196 of the Act shall also not be subjected to any TDS, provided they submit an attested copy of the PAN along with the documentary evidence in relation to the same.

Application of Nil rate at the time of tax deduction / withholding on dividend amounts will depend upon the completeness and satisfactory review by the Company, of the documents submitted by such shareholders. Notwithstanding anything contained above, in case where the shareholders provide a certificate under Section 197 of the Act for lower / NIL withholding of taxes, the rate specified in the said certificate shall be considered, based on submission of self-attested copy of the same.

2. NON-RESIDENT SHAREHOLDERS OR FOREIGN COMPANIES: Tax is required to be withheld in accordance with the provisions of Section 195 of the Act at applicable rates in force. As per the said provision, the tax shall be withheld @ 20% plus applicable surcharge and cess on the amount of dividend payable. However, as per Section 90 of the Act, a non-resident payee has the option to be governed by the provisions of the Double Tax Avoidance Agreement ('DTAA') read with Multilateral Instrument ('MLI'), if applicable, between India and the country of tax residence of the shareholder, if they are more beneficial to the shareholder. For this purpose, to avail the DTAA benefits read with MLI (if applicable), the non-resident shareholder will have to provide certain documents, namely:

1. Tax is required to be withheld in accordance with the provisions of Section 195 of the Act at applicable rates in force. As per the said provision, the tax shall be withheld @ 20% plus applicable surcharge and cess on the amount of dividend payable. However, as per Section 90 of the Act, a non-resident payee has the option to be governed by the provisions of the Double Tax Avoidance Agreement ('DTAA') read with Multilateral Instrument ('MLI'), if applicable, between India and the country of tax residence of the shareholder, if they are more beneficial to the shareholder. For this purpose, i.e. to avail the DTAA benefits read with MLI (if applicable), the non-resident shareholder will have to provide certain documents, namely:
 - a. Self-attested copy of PAN Card, if any, allotted by the Indian Income Tax authorities;
 - b. Self-attested copy of Tax Residency Certificate ('TRC') obtained from the tax authorities of the country of which the shareholder is resident, valid as on date of payment;
 - c. Self-declaration in Form 10F, please download from the Company's website viz. click on <https://goclcorp.com/#INVESTORINFO>
 - d. Self-declaration by the non-resident payee containing such particulars/ confirmation as would be relevant to be governed by and/ or avail benefits, if any, under the applicable DTAA read with MLI (draft format attached herewith) can be downloaded from the website of the Company viz click on <https://goclcorp.com/#INVESTORINFO>

Application of beneficial DTAA rates at the time of tax deduction / withholding on dividend amounts will depend upon the completeness and satisfactory review by the Company, of the documents submitted by the non-resident payee. If required, the documents may further be corroborated by supporting documents such as opinion from an accounting firm or a law firm which categorically confirms the eligibility of the shareholder to obtain DTAA benefits particularly pertaining to the lower rate of taxation of dividends prescribed under the specific article of the DTAA read with MLI.

2. Dividend paid to Foreign Institutional Investors ("FII") and Foreign Portfolio Investors ("FPI") - The tax shall be deducted at source @ 20% (plus applicable surcharge and cess) on dividend paid to FII and FPI. For the purpose of withholding tax, it may not be possible to consider applicable DTAA benefits, if any, in case of FII and FPI since the provisions of the Act do not provide so;

3. Tax resident of any notified jurisdictional area- Where any shareholder is a tax resident of any country or territory notified as a notified jurisdictional area under Section 94A(1) of the Act, tax will be deducted at source at the rate of 30% or at the rate specified in the relevant provision of the Act or at the rates in force, whichever is higher, from the dividend payable to such shareholder in accordance with Section 94A(5) of the Act. Notwithstanding anything contained above, in case the shareholders provide a certificate under Section 197 of the Act for lower / NIL withholding of taxes, the rate specified in the said certificate shall be considered based on submission of self-attested copy of the same.

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 returns (referred to as "Specified Persons"). Under section 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 provision of the Act; or
- ▶ at twice the rate or rates in force; or
- ▶ at the rate of 5%.

"Specified person" as defined under section 206AB (3) is someone who satisfies the following conditions:

- A person who has not filed income tax return 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 TDS and TCS in whose case is Rs. 50,000 or more in the said previous year.

Non-resident shareholders who do not have permanent establishment in India are excluded from the scope of a "specified person". In cases where Sections 206AA and 206AB are applicable i.e. the shareholder has not submitted PAN as well as not filed the return, tax will be deducted at higher of the rates prescribed in these sections.

The Central Board of Direct Taxes vide Circular No. 11 of 2021 dated June 21, 2021 has clarified that new functionality will be issued for compliance check under Section 206AB of the Act. Accordingly, for determining TDS rate on Dividend, the Company will be using said functionality to determine 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 with Company in the manner prescribed in the Rules (Please download declaration as per Rule 37BA from the Company's website viz click on <https://goclcorp.com/#INVESTORINFO>)

UPDATION OF PAN, EMAIL ADDRESS AND OTHER DETAILS:

All the shareholders are requested to update the residential status, registered email address, mobile number, category and other details with their relevant depositories through their depository participants, if the shareholding is in Demat form or with the Company, if the shareholding is held in physical form, as may be applicable. The Company is obligated to deduct TDS based on the records made available by National Securities Depository Limited or Central Depository Services (India) Limited (collectively referred to as "the Depositories") in case of shares held in Demat mode and from the Company record in case of shares held in physical mode and no request will be entertained for revision of TDS return.

SHAREHOLDERS HAVING MULTIPLE ACCOUNTS UNDER DIFFERENT STATUS / CATEGORY:

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.

You are requested to please send duly filled in and signed forms and declarations as applicable to secretarial@goclcorp.com on or before **September 14, 2023** and also for any clarifications related to TDS on the dividend. The Company will provide certificate for tax deduction in Form 16A for tax deducted at source as per the prescribed law. The tax credit can also be viewed in Form 26AS with your login credentials (with valid PAN) at TRACES or e-filing website of the Income tax department of India at the links <https://www.tdscpc.gov.in/app/login.xhtml> or <https://www.incometax.gov.in/iec/foportal> respectively.

We also request you to register your email IDs, mobile numbers and update your bank account details with your Depository Participant for receiving electronic credit of dividends directly into your bank accounts, in case you are holding shares in electronic form or with the RTA in case of holdings in physical form.

Above communication on TDS sets out the provisions of law in a summary manner only and does not purport to be a complete analysis or listing of all potential tax consequences. Shareholders are advised to consult with their own tax advisors for the tax provisions that may be applicable to them.

Thanking you,

Yours faithfully,
For GOCL Corporation Limited

Sd/-
A Satyanarayana
Company Secretary