SUNFLAG IRON AND STEEL COMPANY LIMITED

REGISTERED OFFICE: 33/1, MOUNT ROAD, SADAR, NAGPUR – 440001, MH, INDIA
Corporate Identification Number (CIN) – L 27100 MH 1984 PLC 034003
Tel No. + 91 712 2524661 / 2520356, **Fax No.** + 91 712 2520360
E-Mail ID : investor@sunflagsteel.com, **Website :** www.sunflagsteel.com

To,
The Members,

Subject: – Communication on Tax Deduction on Dividend Payout

THIS COMMUNICATION IS IMPORTANT AND REQUIRES YOUR IMMEDIATE ATTENTION

Dear Member,

We are pleased to inform you that the Board of Directors of the Company had at its meeting held on May 29, 2026, recommended a final dividend @10.00% (i.e. ₹ 1/- per share) on Equity Share of face value of ₹ 10/- (₹ Ten) each for the financial year ended March 31, 2026. The said dividend is subject to approval of the members at the forthcoming Annual General Meeting ("**AGM**") of the Company.

In this regard, Members may note that the Income Tax Act, 2025, ("**IT Act**"), the dividend paid or distributed by a Company is taxable in the hands of members. The Company shall therefore be required to deduct tax at source (TDS) at the time of making the payment/ credit of dividend at the rates prescribed under the IT Act.

In order to enable the Company to determine the appropriate TDS rate as applicable, members are requested to submit the documents in accordance with the provisions of the IT Act. This communication provides a brief of the applicable Tax Deduction at Source (TDS) provisions under the Act for Resident and Non-Resident members.:

1. **For Resident Members:** Tax shall be deducted at source under Section 393(1) (Table: S. No. 7) r.w.s. 393(4) (Table: S. No. 10) of IT Act [corresponding to erstwhile Section 194 of the Income-tax Act, 1961 ("ITA 1961")] as follows:

Members having valid Permanent Account Number (PAN) - Section 393(1)	10%* or as may be notified by the Government of India (GOI)
Members not having PAN / valid PAN/ PAN not linked with Aadhar number - Section 397(2)	20% or as may be notified by the GOI

* As per Section 397(2) of the IT 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 with this, the PAN allotted shall be deemed to be invalid / inoperative and he shall be deducted at the higher rates as provided in section 397(2) of the IT Act, 2025 i.e., 20% of tax deduction at source.

However, no tax shall be deducted on the dividend payable to resident individual shareholders if

- The total dividend to be received by them during financial year 2026-2027 does not exceed ₹10,000.
- The members provide duly filled and signed Form No. 121 (enclosed as ***Annexure-1***) (previously known as Form 15G/15H), along with self-attested copy of valid PAN, subject to conditions specified in the IT Act.
- Exemption certificate u/s 395(1) is obtained from the Income-tax Department, if any.

Self-attested copy of pan card is mandatory alongwith Form 121 declaration.

Kindly note that only those forms shall be considered which are found complete in all respects and no further opportunity for resubmission of the form(s) will be provided.

To avoid any rejection on account of incomplete / wrong information, kindly refer to the filled in sample Form 121 (enclosed as ***Annexure - 2***) provided at the link given at the end of this communication.

Resident Non-Individual Members: No tax at source is required to be deducted on the dividend payable to the following resident non-individual members if they submit the information and documents as per the format enclosed as ***Annexure – 3***.

i. **Insurance Companies:** Self declaration that it qualifies as an "Insurer" as per Section 2(7A) of the Insurance Act, 1938 and has full beneficial interest with respect to the equity shares held by it along with self-attested copy of PAN card and certificate of registration with Insurance Regulatory and Development Authority of India ("**IRDAI**");

ii. **Business Trust:** a "business trust", as defined in section 2(21) of ITA 2025, by a special purpose vehicle referred to in Note 2 to Schedule V of IT Act.

iii. **Mutual Funds:** Self-declaration that it is registered with the Securities and Exchange Board of India ("**SEBI**") that that they are governed by the provisions of Schedule VII of the IT Act along with self-attested copy of PAN card and certificate of registration with SEBI;

iv. **Alternative Investment Fund:** Self-declaration that its income is exempt under Schedule V (Table: S. No. 1) of the IT Act, and they are registered with SEBI as Category I or Category II Alternative Investment Fund ("**AIF**") along with self-attested copy of PAN card and certificate of registration with SEBI;

v. **Provident Fund**, **Superannuation Fund**, **Gratuity Fund**, **Pension Fund** and **ESI Fund** whose income is exempt under section 11 of the IT Act and on which TDS is not required to be deducted, are required to provide self-attested valid documentary evidence (like approval granted by Income Tax Officer /Commissioner, relevant copy of registration, etc.)

vi. **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:** Documentary evidence that the Corporation is covered under Section 393(5) of IT Act along with self-attested copy of PAN card.

In addition, no tax/lower tax shall be deducted on the dividend payable to resident non-individual members if the member submits exemption certificate/lower deduction certificate u/s 395(1) of IT Act in respect of Section 393(1) (Table: S. No. 7) of IT Act, if any, issued by the Income-tax Department along with self-attested copy of PAN card.

Further, it may be noted that as per the provisions of Section 397 of IT Act, tax shall be deducted at the rate of 20% in case defective/ invalid/ inoperative PAN is submitted by the member.

2. **For Non-Resident Members:** For non-resident shareholders, taxes are required to be withheld in accordance with the provisions of Section 393(2) [Table Sl. No. 17] read with Section 207(1) [Table Sl. No.1] of the IT Act, at the rates in force.

   i) The withholding tax shall be at the rate of 20% (plus applicable surcharge and cess) on the amount of dividend payable.

   ii) TDS required to be deducted at the rate of 10% (plus applicable surcharge and cess) in case of Specified Funds referred under Schedule VI (Note 1(g)] in terms of Sec. 393(2) (Table: Sl. No. 16) of the Act.

   However, as per Section 159 of the IT Act, non-resident shareholders have the option to be governed by the provisions of the Double Tax Avoidance Agreement (DTAA), read with Multilateral Instrument (MLI), between India and the country of tax residence of the shareholders, if they are more beneficial to them. For this purpose, i.e. to avail the benefits under the DTAA read with MLI, non-resident shareholders will have to provide the following:

   - Self-attested copy of PAN card, if any, allotted by the Indian Income Tax Authorities or details as prescribed under rule 217 of IT Rules 2026.
   - Self-attested copy of Tax Residency Certificate ('TRC') obtained from the tax authorities of the country of which the shareholder is resident, evidencing shareholder's tax residency status during Financial Year 2026-27. In case, the TRC is furnished in a language other than English, the official translated copy of TRC in English language would be required.
   - E-filed copy of Form 41 generated electronically from Income tax portal. Form 41 in any other form shall not be considered for treaty benefit.
   - Self-declaration by the non-resident shareholder (enclosed as ***Annexure-4***) as to:

     a. Shareholder is and will continue to remain a tax resident of the country of their residence for the tax year 2026-27.
     b. Shareholder is eligible to claim the beneficial Tax Treaty rate for the purposes of tax withholding on dividend declared by the Company.
     c. Shareholder has no reason to believe that their claim for the benefits of the DTAA is impaired in any manner.
     d. Shareholder is the ultimate beneficial owner of shares held in the Company and dividend receivable from the Company.
     e. Shareholder does not have a taxable presence/ permanent establishment/ fixed base/ Business Connection/ Place of Effective Management, in India in accordance with the applicable Tax Treaty or dividend income is not attributable/ effectively connected to any permanent establishment or fixed base in India.
     f. The key management and commercial decisions necessary for the conduct of the entity's business as a whole are, in substance, made in the country of residence, of which the Shareholder is a tax resident, and all Board of Directors' meetings are held in such country with a functional quorum present locally.
     g. The Shareholder maintains adequate economic and operational substance in the country of residence, including a physical office, employment of suitably qualified personnel, and incurrence of significant local operational expenses commensurate with its business activities

   - Any other documents as prescribed under the Act for lower withholding tax rates, if applicable, duly attested by the member.

   - In case of shareholder being tax resident of Singapore, along with the above (as might be applicable), 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).

   In case of Foreign Institutional Investors (FII) / Foreign Portfolio Investors (FPI), tax will be deducted under Section 393(2) (Table S. No. 15) of the IT Act at the rate of 20% (plus applicable surcharge and cess) or the rate provided in relevant DTAA, read with MLI, whichever is more beneficial, subject to the submission of the above documents, if applicable.

In addition, no tax/lower tax shall be deducted on the dividend payable to non-resident members if –

i. the member submits exemption certificate/lower deduction certificate u/s 395(1) of ITA 2025 in respect of Section 393(2)(Table: S. No. 17) of ITA 2025 [corresponding to erstwhile Section 195 of ITA 1961], if any, issued by the Income-tax Department along with self-attested copy of PAN card.

ii. in case of Sovereign Wealth Fund, Pension Funds, other bodies notified under Schedule V (Table S. No. 7) of ITA 2025 [corresponding to erstwhile Section 10(23FE) of ITA 1961], if the member submits self-attested valid documentary evidence regarding the applicability of Schedule V (Table S. No. 7) of ITA 2025 and a declaration substantiating the fulfilment of conditions prescribed under Schedule V (Table S. No. 7) of ITA 2025.

Kindly note that the aforementioned documents should be sent to Bigshare Services Private Limited, the Registrar and Transfer Agent ("RTA")") at tds@bigshareonline.com on or before September 18, 2026.

Resident Non-Individual Members, including Insurance Companies, Mutual Funds and Alternative Investment Funds (AIFs) established in India, and Non-Resident Non-Individual Members, including Foreign Institutional Investors (FIIs) and Foreign Portfolio Investors (FPIs), may alternatively submit the relevant forms, declarations and documents through their respective custodians registered on the NSDL platform within the aforesaid timeline.

NO COMMUNICATION/DOCUMENTS IN RESPECT OF TDS WOULD BE ACCEPTED FROM MEMBERS AFTER SEPTEMBER 18, 2026.

3. **Declaration by Recipient Shareholder for transfer of TDS credit to the beneficial shareholder under Rule 203 of IT Rules 2026**

In case dividend income is assessable in the hands of person other than member then declaration needs to be provided by member for the same as per Rule 203 of IT Rules 2026[corresponding to erstwhile Rule 37BA of IT Rules 1962]. The declaration must consist of the following details of the beneficial shareholders: (a) Name, (b) Address, (c) PAN, (d) Residential status, (e) Category of shareholder (i.e., individual, firm, company, etc.) and (f) No. of shares. Format for declaration under Rule 203 (enclosed as ***Annexure 5***).

Declaration may be submitted before the payment of dividend by the company. Members may note that TDS credit will be applied only in a scenario where the beneficial shareholders in respect of cases where TDS rate applicable for the beneficial shareholder is in line with TDS rate considered for deduction in respect of the member. Further, the company would independently carry out relevant verification and would transfer TDS credit only in case the aforementioned conditions are satisfied.

4. **Other General Information to members:**

i. The Company is not obligated to apply the beneficial DTAA rates at the time of tax deduction on dividend paid to members. Application of beneficial DTAA rate shall depend upon the completeness and satisfactory review by the Company, of the documents submitted by Non- Resident members.

ii. Application of TDS rate is subject to necessary due diligence and verification of the members details as available in register of Members on the Record Date and aforesaid prescribed documents. In case of ambiguous, incomplete or conflicting information, or the valid information/documents not being provided, the Company will deduct tax at the maximum applicable rate.

iii. In case TDS is deducted at a higher rate, an option is still available with the member to file the return of income and claim an appropriate refund, if eligible.

iv. In the event of any income tax demand (including interest, penalty, etc.) arising from any misrepresentation, inaccuracy or omission of information provided / to be provided by the Member, such Member will be responsible to indemnify the Company against all claims, demands, penalties, losses etc. and also, provide the Company with all information / documents and co-operation in any appellate proceedings. No claim shall lie against the Company for such taxes deducted.

v. 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. Members should consult with their own tax advisors for the tax provisions applicable to their particular circumstances.

While on the subject, for updation of your personal details including PAN, bank account, email id, mobile number, you are requested to contact:

- in case of shareholding in electronic form - with your Depository Participant.

- in case of shareholding in physical form - with the RTA viz. Bigshare Services Private Limited.

Members are requested to address all correspondence, including dividend-related matters, to Bigshare Services Private Limited by e-mail at tds@bigshareonline.com and/or to Company at investor@sunflagsteel.com.

Yours faithfully,
For SUNFLAG IRON AND STEEL COMPANY LIMITED

Sd/-
CS Ashutosh Mishra
Head Company Secretary
Membership No. ACS-23011

Annexure - 1

FORM NO. 121

[*See* rule 211]

Declaration under section 393(6) for receipt of certain incomes without deduction of tax

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PART A

[To be Filled by the person for receipt of certain incomes without deduction of tax]

<table>
<tr><th colspan="4">Details of the declarant</th></tr>
<tr><td>1.</td><td>Name</td><td colspan="2"></td></tr>
<tr><td>2.</td><td>Address</td><td colspan="2"></td></tr>
<tr><td>3.</td><td>Permanent Account Number</td><td colspan="2"></td></tr>
<tr><td>4.</td><td>Folio No. / Client ID & DPID</td><td colspan="2"></td></tr>
<tr><td>5(a).</td><td>Status</td><td colspan="2">Individual</td></tr>
<tr><td>5(b).</td><td>Residential status</td><td colspan="2">Resident</td></tr>
<tr><td>5(c).</td><td>If resident individual, whether age is 60 years or more at any time during the tax year</td><td colspan="2"></td></tr>
<tr><td>6.</td><td>Email id</td><td colspan="2"></td></tr>
<tr><td>7.</td><td>Contact number</td><td>Country Code</td><td>Mobile Number</td></tr>
<tr><td>8.</td><td>Tax Year (for which declaration is made)</td><td colspan="2">2026-27</td></tr>
<tr><th colspan="4">Details of income</th></tr>
<tr><td>9.</td><td>Nature of income</td><td colspan="2">Dividend</td></tr>
<tr><td>10.</td><td>Estimated income for which declaration is made</td><td colspan="2"></td></tr>
<tr><td>11.</td><td>Whether Form No. 121 other than this form filed during the tax year</td><td colspan="2"></td></tr>
<tr><td>11(a).</td><td>Total number of Form No. 121 filed earlier</td><td colspan="2"></td></tr>
<tr><td>11(b).</td><td>Aggregate amount of income for which Form No. 121 were filed</td><td colspan="2"></td></tr>
</table>

<table>
<tr><td>12.</td><td colspan="3">Aggregate amount of income for which declaration is made during the tax year [sum of column 10 and 11(b)]</td><td></td></tr>
<tr><td>13.</td><td colspan="3">Estimated total income of the tax year including the income mentioned in column 12</td><td></td></tr>
<tr><td rowspan="4">14.</td><td colspan="3">Details of the ITR filed for previous two tax years</td><td></td></tr>
<tr><td>Sl. No.</td><td>Tax Year</td><td>Acknowledgement Number</td><td>Returned Income</td></tr>
<tr><td>1.</td><td></td><td></td><td></td></tr>
<tr><td>2.</td><td></td><td></td><td></td></tr>
</table>

DECLARATION

I …... having Permanent Account Number ....do hereby declare that

(i) to the best of my knowledge and belief what is stated above is correct, complete and is truly stated.

(ii) the incomes referred to in this form are not includible in the total income of any other person under sections 96 to 99.

(iii) tax on my estimated total income as referred to in column 13 of Part A (including the income referred to in column 12 of Part A) for tax year **2026-27** will be nil.

(iv) my income as referred to in column 12 of Part A does not exceed the maximum amount not chargeable to tax for tax year **2026-27** (*not to be applicable in case of resident individual of age of sixty years or more at any time during the tax year*)

(v) in case this declaration is found to be false, I shall be liable to prosecution/penalty under the Act.

Place: …………………..…   Signature of the Declarant

Date: ……………………..….   Name:

FORM NO. 121

[*See* rule 211]

Declaration under section 393(6) for receipt of certain incomes without deduction of tax

PART A

[To be Filled by the person for receipt of certain incomes without deduction of tax]

Details of the declarant			
1.	Name	Mention Full Name	
2.	Address	Mention Full Address including State and PIN code.	
3.	Permanent Account Number	Mention PAN	
4.	Folio No. / Client ID & DPID	Mention Folio No. or 16-digit Client ID & DPID	
5(a).	Status	Individual	
5(b).	Residential status	Resident	
5(c).	If resident individual, whether age is 60 years or more at any time during the tax year	Mention 'Yes' or 'No' as applicable	
6.	Email id	Mention Email Address	
7.	Contact number	Country Code Mention Country code	Mobile Number Mention Mobile Number
8.	Tax Year (for which declaration is made)	2026-27	
Details of income			
9.	Nature of income	Dividend	
10.	Estimated income for which declaration is made	Mention amount of dividend income for which exemption is being claimed	
11.	Whether Form No. 121 other than this form filed during the tax year	Mention 'Yes' if any other Form 121 has been filed during FY 2026-27. Else mention 'No'.	
11(a).	Total number of Form No. 121 filed earlier	If 'Yes' is mentioned at column 11 above, mention total no. of Form 121 filed (other than the current form). Else mention 'NA'.	
11(b).	Aggregate amount of income for which Form No. 121 were filed	If 'Yes' is mentioned at column 11 above, mention aggregate amount of income which has been declared in other Form 121 (i.e., other than the amount declared in current form). Else mention 'NA'.	

12.	Aggregate amount of income for which declaration is made during the tax year [sum of column 10 and 11(b)]	Mention sum of column 10 and 11 (b)
13.	Estimated total income of the tax year including the income mentioned in column 12	Mention the estimated total income for FY 2026-27 (including the income mentioned at column 12 above).
14.	Details of the ITR filed for previous two tax years	Please mention below the details of the income tax returns filed for the previous two financial years.

Sl. No.	Tax Year	Acknowledgement Number	Returned Income
1.	Please mention financial year.	Please mention ITR acknowledgment number.	Please mention the 'total income' reported in the return.
2.	Please mention financial year.	Please mention ITR acknowledgment number.	Please mention the 'total income' reported in the return.

DECLARATION

I. ……...Mention Full Name............. having Permanent Account Number ………Mention PAN ..… do hereby declare that

(i) to the best of my knowledge and belief what is stated above is correct, complete and is truly stated.

(ii) the incomes referred to in this form are not includible in the total income of any other person under sections 96 to 99.

(iii) tax on my estimated total income as referred to in column 13 of Part A (including the income referred to in column 12 of Part A) for tax year …. 2026-27….. will be nil.

(iv) my income as referred to in column 12 of Part A does not exceed the maximum amount not chargeable to tax for tax year…2026-27 ....(*not to be applicable in case of resident individual of age of sixty years or more at any time during the tax year*)

(v) in case this declaration is found to be false, I shall be liable to prosecution/penalty under the Act.

Sign the document

Signature of the Declarant

Place: …Mention Place………

Date: …Mention Date ……….

Name: Mention Full Name

Important Points -

1. Kindly provide appropriate details in all columns and do not leave any column blank.
2. Kindly note that only those Form 121 shall be considered which are found complete in all respects and no further opportunity for resubmission of the Form(s) will be provided
3. Self-attested copy of PAN card is mandatory along with Form 121 declaration.

[On the letter head of the resident non-individual member]

Annexure - 3

Date:

To,
M/s Bigshare Services Private Limited –
Unit – Sunflag Iron and Steel Company Limited
Office No. S6-2, 6th Floor, Pinnacle Business Park,
Next to Ahura Centre, Mahakali Caves Road,
Andheri (East), **MUMBAI – 400093**

Dear Sir/Madam,

Subject: Declaration regarding Category and beneficial ownership of shares

Ref: PAN -

Folio Number / DP ID / Client ID -

With reference to the captioned subject, and in relation to the appropriate withholding of taxes on the dividend payable to us by Indian Oil Corporation Limited ('the Company'), we hereby declare as under:

1. We, [………………………………………………] [FULL NAME OF SHAREHOLDER], holding share/shares of the Company as on the record date, hereby declare that we are tax resident of India for the period April 2026 - March 2027 (Indian Fiscal Year).

2. We hereby declare that (Strike off whichever is not applicable):

   *We are an **Insurance Company** covered under Section 393(4) (Table: S. No. 10) of the Income Tax Act, 2025 and are the beneficial owner of the share/shares held in the Company; and we are submitting a self-attested copy of PAN Card and registration certificate.

   OR

   *We are a **Mutual Fund** specified under Schedule VII (Table: S. No. 20 and 21) of the Income Tax Act, 2025 and are the beneficial owner of the share/shares held in the Company; and we are submitting self-attested copy of the PAN Card and registration certificate.

   OR

   *We are an **Alternative Investment Fund (AIF)** established in India; and our income is exempt under Schedule V (Table: S. No. 1) of the Income Tax Act, 2025. We are governed by SEBI regulations as Category I or Category II AIF; and we are submitting a self-attested copy of the PAN card and registration certificate. We also affirm that income from such shares is not categorized as Income under the 'Profits and gains from business or profession'.

   OR

**Strike off whichever is not applicable.*

*We are a **Business Trust (ReIT / InVIT)** as defined in section 2(21) of the Income Tax Act, 2025 and are not subject to withholding tax as per Section 393(4) (Table: S. No. 10) of the Income Tax Act, 2025 and we are submitting a self-attested copy of the PAN card and registration certificate.

OR

*We are **[…..] [NATURE OF ENTITY]** and are the beneficial owner of the share/shares held in the Company; and are not subject to withholding tax as per Section 393(4) (Table: S. No. 10)/ Section 393(5)/ Section 393(9) of the Income Tax Act, 2025; and we are submitting a self-attested copy of the documentary evidence supporting the exemption status (e.g. relevant copy of relevant rule, registration, notification, order, etc.) along with a self- attested copy of the PAN card.

3. We will indemnify and hold harmless the Company for any tax, interest, penalty or related cost that the Company may incur due to non-withholding or withholding of tax at lower rate arising out of any acts of commission or omission initiated by the Company by relying on our above averment.

4. 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.

Yours faithfully,

For […...] [FULL NAME OF SHAREHOLDER]

Authorized Signatory

Name : _

Designation : _

Email ID : _

Contact No. : _

Address: _

**Strike off whichever is not applicable.*

Date:

To,
M/s Bigshare Services Private Limited –
Unit – Sunflag Iron and Steel Company Limited
Office No. S6-2, 6th Floor, Pinnacle Business Park,
Next to Ahura Centre, Mahakali Caves Road,
Andheri (East), **MUMBAI – 400093**

Dear Sir/Madam,

Ref: Declaration for claiming the tax treaty benefits for the tax year 2026-27 (i.e., for the period from 01 April 2026 to 31 March 2027)

I / We, […..] [FULL NAME OF SHAREHOLDER] do hereby solemnly declare as follows:

1. *[…...] [FULL NAME OF SHAREHOLDER] is an individual.

   OR

   *[…………………………………………………] [FULL NAME OF SHAREHOLDER] is a [……………………………] [Company/ Firm/ LLP/ Other entity (please specify)] registered and incorporated under the laws of [….................................] [COUNTRY OF RESIDENCE].

2. *My/ Our Indian Permanent Account Number is [… ....].

   OR

   *I / We do not have a PAN allotted to us by the Indian income-tax authorities. However, I / we have submitted the requisite information as per Rule 217 of the Income Tax Rules, 2026.

3. I / We qualify as a tax resident of [… ....] [COUNTRY OF RESIDENCE] as per the provisions of the Agreement for Avoidance of Double Taxation (DTAA) and Prevention of Fiscal Evasion between India and [……………………………] [COUNTRY OF RESIDENCE] (the “India- [… ....] DTAA”) read with the provisions of the Multilateral Instrument (“MLI”);

4. I / We will continue to maintain the ‘tax resident’ status in *his/her/its respective Country for the application of the provisions of the India-[… ....] [COUNTRY OF RESIDENCE]
   DTAA, during the tax year 2026-27;

5. I / We do not qualify as a ‘resident’ of India as per section 6 of the Income Tax Act, 2025 (the ‘Act’). I am / We are therefore eligible to invoke the provisions of the DTAA between India and […] [COUNTRY OF RESIDENCE].

6. I am / We are liable to tax[1] in the [……………………………] [COUNTRY OF RESIDENCE]. [if applicable i.e. if the conditions of ‘liable to tax’ is a pre-requisite for availing benefit of applicable tax treaty]

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[1] As defined under section 2(66) of the Income Tax Act, 2025 or applicable DTAA

**Strike off whichever is not applicable.*

7. *I / We do not have any taxable presence / fixed base / permanent establishment / Place of Effective Management in India.

OR

*I / We have a taxable presence/ fixed base / permanent establishment / Place of Effective Management in India and the dividend income receivable by me / us from investment in the shares of Company is not attributable / effectively connected to such PE / fixed base in India.

8. I / We confirm that I am / we are entitled to claim benefits under the India –[… ....] [COUNTRY OF RESIDENCE] DTAA as modified by the Multilateral Instrument (‘MLI’), (wherever applicable) and that all its relevant provisions of the MLI are fulfilled including the “Principal Purpose Test” in order to implement tax treaty related measures to prevent base erosion and profit shifting signed by India and [… ....] [COUNTRY OF RESIDENCE].

9. Further, I / we hereby confirm that the investments made by me / us in the shares of Company are not arranged in a manner which results in obtaining a tax benefit, whether directly or indirectly, as one of its principal purposes. The tax benefit, if any, derived from such investments would be in accordance with the object and purpose of the relevant provisions of the DTAA between India and […] [COUNTRY OF RESIDENCE].

10. I / We have examined our investment structure in India, analyzed our activity of purchase and sale of listed Indian securities from the Indian General Anti Avoidance Rules (‘GAAR’) perspective in terms of Chapter XI of the Act read with relevant Rules and confirm that the main purpose of its investment structure is not to obtain benefits of the tax treaty and I / we do not satisfy the secondary criteria laid down in clauses (a) to (d) of section 179(1) of the Act.

11. *I am / We are the beneficial owner of the investments made by me / us in the shares of Company and also any income receivable from such investments, for a period of less than 365 days

OR

*I am / We are the beneficial owner of the investments made by me / us in the shares of Company and also any income receivable from such investments, for an uninterrupted period of 365 days or more including the date of payment of the dividends.

OR

*I am / We are the beneficial owner of the investments made by me / us in the shares of Company and also any income receivable from such investments, for a period of more than [………] days [required period of days under the relevant DTAA].

12. I / We further declare that 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.

**Strike off whichever is not applicable.*

13. We confirm that the key management and commercial decisions necessary for the conduct of the entity's business as a whole are, in substance, made in […..] [COUNTRY OF RESIDENCE], of which this [… ....] [Company/ Firm/ LLP/ Other entity (please specify)] is a tax resident. All Board of Directors meetings are held in [… ....] [COUNTRY OF RESIDENCE] with a functional quorum present locally. [not applicable in case of individuals]

14. We confirm that we maintain a physical office, employ [………] [number of employees] of qualified personnel, and incur significant local operational expenses in [… ....] [COUNTRY OF RESIDENCE], which commensurate with our business activities. [not applicable in case of individuals]

15. I / We further declare that I am / we are eligible to claim benefit of the DTAA between India and […..............................] [COUNTRY OF RESIDENCE] including satisfaction of the Limitation of Benefits clause (wherever applicable) and the claim of benefits by me / us is not impaired in any way.

16. I / We also enclose a self-attested copy of Tax Residency Certificate (TRC) for the tax year 2026-27 (i.e. for the period from 01 April 2026 to 31 March 2027) obtained from the tax authorities of the country of which I am / we are a resident.

17. All contractual arrangements entered into by me / us in relation to our investments in the Indian capital markets are at arm's length.

18. I / We hereby confirm that the declarations made above are complete, true and bona fide and no relevant information has been concealed. In case of any change in facts, we will inform the Company at the earliest.

This declaration is issued to the Company to enable them to decide upon the withholding tax applicable on the dividend income receivable by me / us.

In the event that any of the conditions above are found to have not been satisfied or there is mis-representation of facts by me/ us, and the Indian tax authorities do not allow the benefit under the DTAA as modified by MLI, I / we shall indemnify the Company for any additional tax recoverable under the Act, on account of lower withholding of taxes by the Company along with applicable interest and penalties, if any.

Yours faithfully,

For [… ....] [FULL NAME OF SHAREHOLDER]

Authorized Signatory

Name : _

Designation : _

Email ID : _

Contact No. : _

Address : _

**Strike off whichever is not applicable.*

[On the letter head of the shareholder]

Annexure – 5

Date:

To,
M/s Bigshare Services Private Limited –
Unit – Sunflag Iron and Steel Company Limited
Office No. S6-2, 6th Floor, Pinnacle Business Park,
Next to Ahura Centre, Mahakali Caves Road,
Andheri (East), MUMBAI – 400093

Dear Sir/Madam,

Subject: Declaration under Rule 203 of the Income tax Rules, 2026
Ref: PAN -
Folio Number / DP ID / Client ID -

1. I / We, [………………………………………………] [FULL NAME OF SHAREHOLDER], holding share/shares of Indian Oil Corporation Limited ('the Company') as on the record date, hereby request the Company to provide the credit of tax deducted at source (TDS), on the dividend payouts by the Company, to the below mentioned shareholders:

Name of Shareholder	Address of Shareholder	PAN of Shareholder	No. of shares held	Category of Shareholder (i.e., individual, firm, company, trust, etc.)	Residential status of Shareholder for FY 2026-27

2. I/ We further declare that the above-mentioned dividend income is assessable in the hands of the beneficiaries of the shares (as per list provided above) and not in my/ our hands. As per Rule 203 of the Income tax Rules, 2026, credit for tax deducted at source (TDS) on such dividend income is available to the respective beneficiaries of the shares.

3. I/ We undertake that I / we will not claim credit of TDS on the dividend income that is assessable in the hands of the beneficiaries listed above.

4. I/ We hereby validate the above-mentioned information, and I / we hereby declare that to the best of my / our knowledge and belief what is stated above is complete, true and bona fide and no relevant information has been concealed. I / We undertake to indemnify for any tax liability.

   (including but not limited to the interest and penalty) that may arise on you in future on account of deduction of tax at source in the hands of beneficial shareholders on the basis of the above declaration furnished by me/ us.

Yours faithfully,

For [……………………………………………………] [FULL NAME OF SHAREHOLDER]

Authorized Signatory

Name : _

Designation : _

Email ID : _

Contact No. : _

Address : _

* *Strike through whichever is not applicable*