



(Refer Note 9 of the Notice of 44th AGM)

COMMUNICATION ON TAX DEDUCTION AT SOURCE (TDS) ON DIVIDEND

In accordance with the provisions of the Income-tax Act, 2025 ("the Act") (Erstwhile the Income-tax Act, 1961 ("the Old Act"), dividend declared by the Company is taxable in the hands of the shareholders and the Company is required to deduct tax at source ("TDS") on dividend at the applicable rates.

Please take note of the below TDS provisions and information/document requirements for each shareholder:

A. RESIDENT SHAREHOLDERS:

- A.1 No tax shall be deducted on payment of dividend to the resident individual shareholders, if the total dividend for a financial year does not exceed ₹ 10,000 (Rupees Ten Thousand), subject to availability of PAN of shareholder.
- A.2 Tax shall be deducted from Dividend paid to resident shareholders (other than category prescribed under A.1 above) as per the details provided below:

Particulars	Applicable Rate of Tax	Declaration/ documents required
Where valid PAN is updated with the Depository Participant (in case shares are held in dematerialised form) or with Company's Registrar and Transfer Agent ("RTA") i.e. MUFG Intime India Private Limited (Formerly known as Link Intime India Private Limited) (in case shares are held in physical form) and no exemption is sought by the resident shareholder	10%	Not applicable
No PAN/ Invalid PAN/ Inoperative PAN*	20%	Not applicable Note: In case of a shareholder being resident individual eligible for obtaining Aadhaar Number have not linked the Aadhar Number allotted with its PAN (as on the date of payment of such dividend), such PAN would be treated as inoperative for the provisions of deduction of TDS.
Where lower/ nil tax deduction certificate is issued by Income Tax Department under section 395 of the Act (Erstwhile section 197 of the Old Act)	Rate specified in Lower tax withholding certificate obtained from Income Tax Department	- Copy of PAN card - Copy of lower tax withholding certificate obtained from Income Tax Department Note: The certificate should be valid for the tax year 2026-27 and should cover the dividend income from the Company.

* As per section 262 of the Act (Erstwhile section 139AA of the Old 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, except person exempted as per Notification No. 37/2017. In case of failure to comply to this, the PAN allotted shall be deemed to be inoperative and tax shall be deducted at higher rates as prescribed under the Act.



A.3 No tax shall be deducted on Dividend to resident shareholders if the shareholders submit documents mentioned in the below table with the RTA:

Particulars	Declaration/ documents required
Individual furnishing Form 121 (Erstwhile Form 15G/15H)	- Copy of PAN card - Form 121 either filed electronically or in paper form. Format of Form 121 are given in the link below
Submitting Certificate under Section 395 of the Act (Erstwhile section 197 of the Old Act)	- Copy of PAN card - NIL withholding tax certificate obtained from tax authority Note: The certificate should be valid for the tax year 2026-27 and should cover the dividend income from the Company.
Shareholders [e.g. LIC, GIC,] for whom Section 393(4) [Table sr. no 10] of the Act (Erstwhile section 194 of the Old Act) is not applicable	- Copy of PAN card - Self-declaration (refer format SD1 given in the link below) along with adequate documentary evidence (e.g., registration certificate) to the effect that no tax withholding is required pursuant to the provisions of Section 393(4) [Table sr. no 10] of the Act.
Category I and II Alternative Investment Fund (AIF)	- Copy of PAN card - Self-declaration (refer format SD1 given in the link below) that the AIF is registered with SEBI as per SEBI Regulations along with copy of registration certificate along with the confirmation that their income is exempted from tax in terms of notification no. 51/2015 issued by CBDT
Persons covered under Section 393(5) of the Act (Erstwhile section 196 of the Old Act) (e.g. Mutual Funds specified under Section 11(3) read with Schedule VII [Table: S. No. 20 or 21] of the Act, RBI, Govt.)	- Copy of PAN card - Self-declaration (refer format SD1 given in the link below) along with documentary evidence (e.g., registration certificate) that the person is covered under said Section 393(5) of the Act (Erstwhile section 196 of the Old Act)
Other shareholders exempt as per Section 393(4) [Table sr. no. 10] of the Act (Erstwhile section 197A of the Old Act) including those mentioned in Circular No. 18/2017 issued by CBDT viz. New Pension System Trust governed by Section 393(9) of the Act (Erstwhile section 10(44) of the Old Act), Recognized Provident Fund, Approved Superannuation Fund or Approved Gratuity Fund	- Copy of PAN card - Self-declaration (refer format SD1 given in the link below) along with documentary evidence to the effect that no tax withholding is required - Copy of the lower TDS certificate obtained from Income Tax Department (except those covered by Circular 18/2017)

B. NON-RESIDENT SHAREHOLDERS:

As per Section 159 of the Act (Erstwhile section 90 of the Old Act), the non-resident shareholder has the option to be governed by the provisions of the Double Taxation Avoidance Agreement ("Tax Treaty") between India and the country of tax residence of the shareholder, if they are more beneficial to them. Please refer to the below table for the details of documents to avail Tax Treaty benefits:

Particulars	Applicable Rate	Documents required (if any)
Non-resident Shareholders (including Foreign Institutional Investors (FIIs) / Foreign Portfolio Investors (FPIs)	20% plus applicable surcharge and cess OR Tax Treaty Rate (Whichever is lower)	If the shareholder wants to avail the tax rates as per the Tax Treaty, following documents would be required: - Self-attested copy of the Permanent Account Number (PAN) allotted by the Indian Income Tax authorities - Self-attested copy of Tax Residency Certificate (TRC) issued by the competent authority of the country of shareholder's residency, evidencing and certifying the tax residency status of the shareholder in the country of residency during the tax year 2026-27 (covering the period from April 1, 2026 to March 31, 2027) - Electronically generated Form 41 (Erstwhile known as Form 10F) from the link https://eportal.incometax.gov.in - In case of FIIs and FPIs, self-attested copy of SEBI registration certificate





Particulars	Applicable Rate	Documents required (if any)
		- Self-declaration in the (format SD2 given in the link below), certifying that – - You will continue to remain a tax resident of the country of your residency during the Tax Year 2026-27; - You are eligible to claim the beneficial Tax Treaty rate for the purposes of tax withholding on dividend declared by the Company; - You have no reason to believe that your claim for the benefits of the Tax Treaty is impaired in any manner; - You are the beneficial owner of your shareholding in the Company and dividend receivable from the Company; - You do 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 (Non-resident having PE in India would need to comply with provisions of section 397 of the Act (Erstwhile section 206AA of the Old Act); - Non-resident complies with any other condition prescribed in the relevant Tax Treaty and provisions under the Multilateral Instrument ('MLI'). - Tax Identification Number and Complete address in the country of residence
Submitting Certificate under Section 395 of the Act (Erstwhile section 197 of the Old Act)	Rate specified in Lower / Nil withholding tax certificate	Lower/NIL withholding tax certificate obtained from tax authority Note: The certificate should be valid for the financial year 2026-27 and should cover the dividend income from the Company.
Alternative Investment Fund – Category III located in International Financial Services Centre	10% (plus applicable surcharge and cess)	- Copy of PAN card - Self-declaration (refer format SD3 given in the link below) along with adequate documentary evidence (e.g. registration certificate) substantiating the nature of the entity.
Non-Resident Shareholders who are tax residents of Notified Jurisdictional Area as defined under section 176 of the Act (Erstwhile section 94A(1) of the Old Act)	30%	Not applicable
Sovereign Wealth funds and Pension funds notified by Central Government under sections 11(1) read with Schedule V [Table: S. No. 7] of the Act (Erstwhile section 10(23FE) of the Old Act)	NIL	- Copy of PAN card - Copy of the notification issued by CBDT substantiating the applicability under sections 11(1) read with Schedule V [Table: S. No. 7] of the Act (Erstwhile section 10(23FE) of the Old Act) issued by the Government of India. - Self-Declaration (refer format SD4 & SD5 given in the link below) that the conditions specified under sections 11(1) read with Schedule V [Table: S. No. 7] of the Act (Erstwhile section 10(23FE) of the Old Act) have been complied with
Foreign Portfolio Investors (FPIs) – Category I	10% (plus applicable surcharge and cess) in case of a valid PAN	- Copy of PAN card - Self-declaration (refer format SD6 given in the link below) along with adequate documentary evidence (e.g. registration certificate) substantiating the nature of the entity.
Subsidiary of Abu Dhabi Investment Authority (ADIA) as prescribed under sections 11(1) read with Schedule V [Table: S. No. 7] of the Act (Erstwhile section 10(23FE) of the Old Act)	NIL	- Copy of PAN card - Self-Declaration (refer format SD7 given in the link below) substantiating the fulfillment of conditions prescribed under sections 11(1) read with Schedule V [Table: S. No. 7] of the Act (Erstwhile section 10(23FE) of the Old Act)

Application of beneficial Tax Treaty Rate shall depend upon the completeness and satisfactory review by the Company / RTA, of the documents submitted by Non-Resident shareholders and meeting requirement of the IT Act read with applicable Tax Treaty. It must be ensured that self-declaration should be addressed to the Company and should be in the same format as attached. In the absence of the same, the Company will not be obligated to apply the beneficial Tax Treaty rate at the time of tax deduction on dividends.



Section 397 of the Act (Erstwhile section 206AA of the old Act) applicable to all shareholders (resident and non-resident)

Section 397 of the Act provides that where TDS is required to be deducted, on any sum or income or amount paid or payable or credited to any person, then such person shall furnish his PAN, failing to do so the tax shall be deducted at the higher of the below rates:-

- at the rate specified in the relevant provision of this Act; or
- at the rate or rates in force; or
- at the rate of 5% where tax is required to be deducted under section 393(1) [Table: Sl. No. 8(ii) or 8(v)]; or 20% in any other case

Further, sub section (2) of section 397, PAN of the shareholder is invalid, it will be assumed that PAN is not furnished and tax shall be deducted at higher rate.

The Income Tax Department has also released a Compliance Check Functionality to determine whether the PAN in case of individual is operative/ inoperative and the Company would be relying on the report generated from the said facility for compliance with section 262 read with section 397 of the Act.

For all shareholders (Resident and Non-Resident)

Shareholders holding shares under multiple accounts under different residential status/ shareholder category and single PAN, may note that, higher of the tax rate as applicable to different residential status/ category, will be considered on their entire shareholding which is held under different accounts.

The aforementioned forms (duly completed, signed and scanned) along with PAN (unless already registered) shall be submitted on our RTA, MUFG Intime India Private Limited (Formerly Known as Link Intime India Private Limited) website at <https://web.in.mpms.mufg.com/formsreg/submission-of-Form-121-41.html> or email to emltaxexemption@in.mpms.mufg.com on or before August 5, 2026, in order to enable the Company to determine and deduct appropriate TDS / withholding tax, as may be applicable.

After receipt of any of the declarations, if the Company basis its independent assessment, finds any information that is contrary to the declarations received by it, the Company reserves right to rely on the results of its independent assessment and make a deduction of taxes

at a higher rate as per applicable provisions of the IT Act.

It may be further noted that in case the tax on dividend is deducted at a higher rate in absence of receipt of the aforementioned details/ documents or for any other reason, there would still be an option available with the shareholder to file the return of income and claim an appropriate refund, if eligible. No claim shall lie against the Company for such tax deduction.

A declaration must be filed with the Company where the whole or any part of the dividend income is assessable, under the provisions of the IT Act, in the hands of a person other than the shareholder in accordance with Rule 203(2) of the Income Tax Rules, 2026 (Erstwhile Rule 37BA(2) of the Income Tax Rules, 1962). The declaration must consist of name, address, PAN, along with other documents mentioned above depending upon the tax residency status of such person to whom credit is to be given and proportion of credit to be given in respect of dividend income.

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 shareholder (s), such shareholder(s) will be responsible to indemnify the Company and also, provide the Company with all information/documents and co-operation in any appellate proceedings.

This Communication is not exhaustive and does not purport to be a complete analysis or listing of all potential tax consequences in the matter of dividend payment. Shareholders should consult their tax advisors for requisite action to be taken by them.

All communications/ queries in this respect should be addressed and sent to our RTA, MUFG Intime India Private Limited (Formerly Known as Link Intime India Private Limited) at its email address at **investor.helpdesk@in.mpms.mufg.com**.

To view / download 121 (Erstwhile known as 15G/ 15H) https://in.mpms.mufg.com/website/Gogreen/2026/Update/Eicher_Motors_Limited/Form-No-121.pdf

To view / download – Self Declaration SD1 for Resident Shareholders

https://in.mpms.mufg.com/website/Gogreen/2026/Update/Eicher_Motors_Limited/SD1_Declaration_for_Resident_Shareholders.pdf





To view / download - Self Declaration SD2 for Non-Resident Shareholders

https://in.mpms.mufig.com/website/Gogreen/2026/Update/Eicher_Motors_Limited/SD2_Declaration_for_Non_Resident_Shareholders.pdf

To view / download - Self Declaration SD3 for AIF Category III

https://in.mpms.mufig.com/website/Gogreen/2026/Update/Eicher_Motors_Limited/SD3_Declaration_for_AIF_Category_III.pdf

To view / download - Self Declaration SD4 for Sovereign Wealth Fund

https://in.mpms.mufig.com/website/Gogreen/2026/Update/Eicher_Motors_Limited/SD4_Declaration_for_Sovereign_Wealth_Fund.pdf

To view / download - Self Declaration SD5 for Pension Funds

https://in.mpms.mufig.com/website/Gogreen/2026/Update/Eicher_Motors_Limited/SD5_Declaration_for_Pension_Funds.pdf

To view / download - Self Declaration SD6 for Category – I FPI

https://in.mpms.mufig.com/website/Gogreen/2026/Update/Eicher_Motors_Limited/SD6_Declaration_for_Category_I_FPI.pdf

To view / download - Self Declaration SD7 for Abudhabi

https://in.mpms.mufig.com/website/Gogreen/2026/Update/Eicher_Motors_Limited/SD7_Declaration_for_Abudhabi.pdf

To view/download- Declaration under Rule 203

https://in.mpms.mufig.com/website/Gogreen/2026/Update/Eicher_Motors_Limited/Declaration_under_Rule_203.pdf