**कोल इण्डिया लिमिटेड कंपनी सचिवालय 3** तल्ला, कोर-2, प्रेमिसेस-04-एमआर,प्लॉट-ए एफ-III,एक्शन एरिया-1A, न्यूटाउन, रजरहट, कोलकाता-700156, फोन-0332324555, ईमेल: **complianceofficer.cil@coalindia.in** वेबसाइट: <u>www.coalindia.in</u> सी आई एन - <u>L23109WB1973GOI028844</u>



Coal India Limited Company Secretariat Regd. Office:3rd floor, Core-2 Premises no-04-MAR, Plot no-AF-III, Action Area-1A, Newtown, Rajarhat,Kolkata-700156 PHONE; 033-2324-5555, E-MAIL: complianceofficer.cil@coalindia.in WEBSITE: www.coalindia.in CIN-<u>L23109WB1973GOI028844</u>

Ref.No.CIL:XI(D):4157/4156:2025:

Dated: 28-01-2025

To, Listing Department, Bombay Stock Exchange Limited, Scrip Code 533278

To, Listing Department, National Stock Exchange of India Limited, Ref: ISIN – INE522F01014

# विषय: द्वितीय अंतरिम लाभांश 2024-25 के लिए स्रोत पर कर कटौती (टीडीएस) के संबंध में संचार पर सूचना

Sub: Intimation on communication regarding Tax Deduction at Source (TDS) for 2<sup>nd</sup> Interim Dividend 2024-25

महोदय/महोदया,

सीआईएल बोर्ड ने 27 जनवरी 2025 को आयोजित अपनी बैठक में 10 रुपये के अंकित मूल्य पर 5.60 रुपये प्रति इक्विटी शेयर का दूसरा अंतरिम लाभांश घोषित किया है। दूसरे अंतरिम लाभांश 2024-25 के लिए स्रोत पर कर कटौती (टीडीएस) पर विस्तृत संचार संलग्न है।उपरोक्त जानकारी कंपनी की वेबसाइट <u>Events & Announcement</u> पर भी उपलब्ध है। यह आपकी जानकारी के लिए है।

The CIL Board at its meeting held on  $27^{\text{th}}$  Jan' 2025 interalia, has declared  $2^{\text{nd}}$  Interim dividend of **Rs 5.60/-** per equity share on the face value of Rs 10/-Detailed communication on Tax Deduction at Source (TDS) for 2nd Interim Dividend 2024-25 is enclosed herewith.

The above information is also available on the website of the Company at <u>Events & Announcement</u>. This is for your information and record please.

Yours faithfully,

<sup>बी पी</sup> दुबे/B.P Dubey Company Secretary/कंपनी सचिव & Compliance Officer/कम्प्लायंस ऑफिसर

Encl: As above

## COAL INDIA LIMITED Corporate Identity Number: L23109WB1973GOI028844 Office: Coal Bhawan, Premises no-04-MAR, Plot no.-AF-III, Action Area-1A, Newtown, Rajarhat, Kolkata-700156 Phone No.: 033-23245555 Email: cil.taxdoc@coalindia.in website: www.coalindia.in

Date: 27.01.2025

# Sub: Tax on 2<sup>nd</sup> Interim Dividend for FY 2024-25

Dear Shareholder,

Board of Directors of Coal India Limited at their meeting held on 27<sup>th</sup> Jan'2025 has inter-alia declared the payment of **2<sup>nd</sup> Interim Dividend @ Rs.5.60/- per equity share** having face value of Rs.10/- each for the FY 2024-25.

The dividend, as declared by the Board, will be paid to shareholders holding equity shares of the Company, either in electronic or in physical form as on **Friday**, **31**<sup>st</sup> **Jan'2025**, **i.e**, **Record Date**.

In accordance with the provisions of the Income Tax Act, 1961 as amended by and read with the provisions of the Finance Act, 2020, with effect from 1<sup>st</sup> April 2020, dividend declared and paid by the Company shall be taxable in the hands of the shareholders. The Company shall therefore be required to deduct tax at source under section 194, 195 and 196D of Income Tax Act, 1961 ("the Act") depending upon the status and category of the Shareholders at the time of making the payment of the said Dividend.

This communication summarizes the applicable Tax Deduction at Source ("TDS") provisions, as per the Income Tax Act, 1961, for various categories of shareholders along with required documents provided in Table 1 and 2 below:

#### Table 1: Resident Shareholders

Category of shareholder	Tax deduction Rate	Exemption applicability/ Documentation requirement
Any resident shareholder	10%	<ul> <li>No deduction of taxes in the following cases –</li> <li>If dividend income paid or likely to be paid to a resident individual shareholder during FY 2024-25 does not exceed INR 5,000/</li> <li>If shareholder is exempted from TDS provisions through any circular or notification and provides an attested copy of the PAN along with the documentary evidence in relation to the same.</li> <li>Submitting declaration in Form No. 15G (applicable to individuals only in respect of dividend income) / Form 15H (applicable to an Individual who is 60 years and older), fulfilling all the required eligibility</li> </ul>
		<ul> <li>which is do years and older), fullning an the required engibility conditions. While filling the form, the shareholder should ensure that the total amount of dividend expected to be received from Coal India Limited during the current Financial Year (inclusive of dividend received in previous tranches, if any) has to be mentioned to be considered as exempted from TDS.</li> <li>In case PAN is not furnished / found to be invalid, the rate of deduction of tax shall be 20% as per Section 206AA of the Act.</li> </ul>

Category of shareholder	Tax deduction Rate	Exemption applicability/ Documentation requirement
Mutual Funds	NIL	Self-attested copy of registration certificate with SEBI and PAN card along with self-declaration that the mutual funds are notified mutual fund u/s 10(23D)(ii) of Income Tax Act, 1961.
		In case the shares are held in the name of the mutual fund but the beneficial owners are someone else, the same must be informed within the stipulated time with suitable declaration. Further, a list of such beneficial owners as on the record date must also be submitted within the stipulated time.
Insurance Companies: Public & Other Insurance Companies	NIL	Documentary evidence that the provisions of Section 194 of the Income Tax Act, 1961 are not applicable along with self-attested copy of PAN card. In case the shares are held in the name of insurance companies but the beneficial owners are someone else, the same must be informed within the stipulated time with suitable declaration. Further, a list of such beneficial owners as on the record date must also be submitted within the stipulated time.
		Copy of registration certification issued by the IRDAL to be submitted.
Entities exempt under Section 10 of the Act	NIL	If the income is exempt under the Act, the authorized signatory shall submit the declaration duly signed with stamp affixed for the purpose of claiming exemption from TDS along with self-attested copy of PAN card (entities as provided in Circular No.18 of 2017 dated 29 May 2017)
Benefit under Rule 37BA	Rates based on the status of the beneficial owners	In case where shares are held by Clearing Member/ intermediaries/ stock brokers and TDS is to be applied by the Company in the PAN of the beneficial shareholders, then intermediaries/ stock brokers and beneficial shareholders will have to provide a declaration within the stipulated time. Any declaration submitted after the cut-off date will not be accepted.
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.	NIL	Documentary evidence that the Corporation is covered under section 196 of the Income Tax Act, 1961 along with self-attested copy of PAN card.
Shareholder submitting Order under section 197 of the Act	Rate provided in the order	Lower/NIL withholding tax certificate obtained from Income Tax authorities along with self-attested copy of PAN card. Tax will be deducted at the rate specified in the said certificate, subject to furnishing of a self-attested copy of the same. The certificate should be valid for the FY 2024-25 and should cover the dividend income.

Category of shareholder	Tax deduction Rate	Exemption applicability/ Documentation requirement
Alternative Investment fund (AIF)	NIL	A declaration that the income is exempt under section 10(23FBA) of the Act and they are established as Category I or Category II AIF under the SEBI Regulations. Self-attested copy of registration documents and PAN card should be provided.
Other resident shareholder without PAN / Invalid PAN / Shareholders identified as 'specified persons' for the purpose of higher deduction of tax as per 'Compliance Check Facility' made available by the Income-tax department (refer detailed note on Section 206AB below)	20%	Shareholders should update their PAN, if not already done, with depositories (in case shares are held in demat mode) and with the Company's Registrar & Share Transfer Agent – M/s Alankit Assignments Limited, at their email id: <u>rta@alankit.com</u> (in case the shares are held in physical mode).
Minor		In case of a shareholder seeking exemption from tax being deducted at source, he is required to file a declaration with the company in Form 15G. Further, where the minor has a taxable income and tax has been withheld at source under any provisions of the Act, the whole or any part of such income becomes assessable in the hands of a person other than the deductee. The credit for the whole or any part of the tax deducted at source, as the case may be, shall be given to the other person and not to the deductee, provided that the deductee files a declaration with the deductor and the deductor reports the tax deduction in the name of the other person in the information relating to deduction of tax.

# Table 2: Non-resident Shareholders

Category of shareholder	Section	Tax Deduction Rate	Exemption applicability/ Documentation requirement
Any non-resident	195/196D	20% (plus applicable	Non-resident shareholders / FFI / FPI may opt
shareholder /		surcharge and cess) or Tax	for tax rate under Double Taxation Avoidance
Foreign Institutional		Treaty rate whichever is lower	Agreement ("Tax Treaty"). The Tax Treaty rate
Investors (FII) /			shall be applied for tax deduction at source on
Foreign Portfolio			submission of following documents to the
Investors (FPI)			Company:
			Copy of the PAN Card, if any, allotted by the Indian authorities.
			<ul> <li>Self-attested copy of Tax Residency Certificate (TRC) valid as on the record</li> </ul>

Category of shareholder	Section	Tax Deduction Rate	Exemption applicability/ Documentation requirement
			date obtained from the tax authorities of the country of which the shareholder is resident.
			Electronically generated Form 10F from the link <u>https://eportal.incometax.gov.in/</u>
			Self-declaration from Non-residents, primarily covering the following:
			<ul> <li>Non-resident is eligible to claim the benefit of respective tax treaty.</li> </ul>
			<ul> <li>Non-resident receiving the dividend income is the beneficial owner of such income.</li> </ul>
			<ul> <li>Dividend income is not attributable/effectively connected to any Permanent Establishment (PE) or Fixed Base in India.</li> </ul>
			<ul> <li>Non-resident complies with any other condition prescribed in the relevant Tax Treaty and provisions under the Multilateral Instrument ('MLI');</li> </ul>
			<ul> <li>Non-resident does not have a place of effective management in India.</li> </ul>
			TDS under the Tax Treaties will only be considered as per the rates mentioned in the Dividend Article of respective Tax Treaty. No claims for concessional rate as per the Most Favoured Nation ('MFN') clause shall be claimed and/or allowed.
			TDS shall be deducted at 20% (plus applicable surcharge and cess) if any of the above- mentioned documents are not provided / found to be not valid.
			The Company is not obligated to automatically apply the Tax Treaty rates at the time of tax deduction/withholding on dividend amounts. Application of Tax Treaty rate shall depend upon the completeness and satisfactory review by the Company, of the documents submitted by the non-resident shareholders.

Category of shareholder	Section	Tax Deduction Rate	Exemption applicability/ Documentation requirement
Shareholders Submitting Order under section 197 of the Act	197	Rate provided in the Order	Lower/NIL withholding tax certificate obtained from Income Tax authorities, along with self- attested copy of PAN card. Tax will be deducted at the rate specified in the said certificate, subject to furnishing a self-attested copy of the same. The certificate should be valid for the FY 2024-25 and should cover the dividend income.
Non-Resident Shareholders who are tax residents of Notified Jurisdictional Area as defined under Section 94A(1) of the Act	195	30% (plus applicable surcharge and cess)	-
Sovereign Wealth Fund, Pension Funds, Other bodies notified under section 10(23FE) of the Act	10(23FE)	Nil	Self-Declaration substantiating the fulfilment of conditions prescribed under Section 10(23FE) of the Act along with copy of certificate of registration/ incorporation.
Shareholders identified as 'specified persons' for the purpose of higher deduction of tax as per 'Compliance Check Facility' made available by the Income-tax department (refer detailed note on Section 206AB below)	206AB	Twice the rate specified in the relevant provision of the Act; or Twice the rate or rates in force whichever is higher	
Declaration regarding opting out of Sec 115BAC		Not Applicable	From FY 2023-24, the Company is required to declare in the quarterly TDS Return in Form 27Q whether the shareholder is opting the old regime or new regime prescribed under section 115BAC while filing the return of income. In view of the same, the non-resident shareholders are required to give a declaration mentioning their Name, PAN, status of PAN and whether section 115BAC of the Income Tax Act, 1961 is opted or not. Note: Where no declaration is received, it will be assumed that the non – resident shareholder is opting out of section 115BAC.

#### Shareholders are also requested to take note of the following:-

- 1. For shareholders holding shares under multiple accounts under different status/category and single PAN, 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.
- 2. While filing Form 15G/15H, the following must be noted

"Estimated Income for which this declaration is made" - The total dividend income received from CIL during the current financial year including the present dividend.

"Details of Income for which the declaration is filed" -

- i. Identification number of relevant investment / account etc.- DP ID/Client ID
- ii. Nature of Income Dividend Income
- iii. Section under which tax is deductible Section 194
- iv. Amount of Income total dividend income received from CIL during the current financial year including the present dividend
- 3. The aforementioned documents are required to be mailed to us at <u>cil.taxdoc@coalindia.in</u> on or before Monday, 3<sup>rd</sup> Feb'2025 (cut-off date) in order to enable the Company to determine appropriate TDS / withholding tax rate. No communication on the tax determination/deduction shall be entertained post the cut-off date. The Company reserves the right to reject the documents in case of any discrepancy or if the documents are found to be incomplete.
- 4. In case the tax on said Dividend is deducted at a higher rate in absence of receipt of the aforementioned details/documents, there would still be an option available to file the return of income and claim an appropriate refund, if eligible, but no claim shall lie against the Company for such taxes deducted.
- 5. 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 send a duly signed declaration with details of actual beneficiary as on the record date in excel sheet to <u>cil.taxdoc@coalindia.in</u> in the manner prescribed in the said Rules on or before Monday, 3<sup>rd</sup> Feb'2025 (cut-off date) for the purpose of payment of Dividend. Declarations filed/received after the said period shall not be considered.

## SECTION 206AA & 206AB OF THE ACT

Rate of TDS u/s 194 ,195 & 196D of the Act are subject to provisions of Section 206AB of the Act (effective from 1<sup>st</sup> July, 2021) which introduced special provisions for TDS in respect of taxpayers who have not filed their income-tax return (referred to as specified persons).

Individual Shareholders are requested to ensure that their Aadhar number is linked with PAN, as per the timelines prescribed. In case of failure of linking Aadhar with PAN within the prescribed timelines, PAN shall be considered inoperative and in such scenario, tax shall be deducted at higher rate of 20% under section 206AA of the IT Act.

U/s 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%.

In cases where Sections 206AA (Non - PAN) and 206AB are applicable i.e. the PAN of the shareholder is invalid/inoperative as well as the shareholder has not filed the return; tax will be deducted at higher of the two rates prescribed in these sections.

"Specified person" as defined u/s 206AB(3) is someone who satisfies the following conditions:

- A person who has not filed income tax return for one previous year immediately prior to the previous year in which tax is required to be deducted, for which the time limit of filing of return of income under section 139(1) of the Act has expired; and
- The aggregate of TDS and TCS in whose case is Rs. 50,000 or more in each of these two previous years.

Non-resident shareholders who do not have permanent establishment in India (i.e. fixed place of business of India) are excluded from the scope of a "specified person".

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 206AA & 206AB of the Act.

While on the subject, it is also requested to submit / update the bank account details with respective Depository Participant, in case shares are being held in electronic form. In case the shareholding is in physical form, it is requested to submit a scanned copy of a covering letter, duly signed by the first shareholder, along with a cancelled cheque leaf with shareholder name and bank account details and a copy of PAN card, duly self-attested, with our RTA, M/s Alankit Assignments Limited. This will facilitate the receipt of dividend directly into the bank accounts. In case the cancelled cheque leaf does not bear the name, it is requested to attach a copy of the bank pass-book statement, duly self-attested.

Shareholders are also requested to register their email IDs and mobile numbers with the Company at **cil.taxdoc@coalindia.in** or with M/s Alankit Assignments Limited at their email id: **rta@alankit.com**.

Shareholders' cooperation is highly solicited.

### For COAL INDIA LIMITED

Sd-

B.P.Dubey Company Secretary

Note: Please mention DP ID/ Client ID, PAN & contact number in all future communications.