



SEC/48/2017-63

January 04, 2021

<b>The Manager, Compliance Department, BSE Limited, Phiroze Jeejeebhoy Tower, Dalal Street, Mumbai – 400 001.</b>	<b>The Manager, Compliance Department, The National Stock Exchange of India Ltd., Exchange Plaza, Bandra - Kurla Complex, Bandra (East) Mumbai – 400 051.</b>
<b>Scrip Code/Symbol: 540678/COCHINSHIP</b>	

Dear Sir / Madam,

**Subject: Interim Dividend 2020-21 – Communication on Tax Deduction at Source (TDS)  
on Dividend payout**

1. We are enclosing herewith the communication being sent to the shareholders through e-mail on the above referred subject for dissemination of information widely to the members.
2. A copy of the above communication is also available on the website of the Company [www.cochinshipyard.com](http://www.cochinshipyard.com)

Thanking you,

**For Cochin Shipyard Limited**

**Syamkamal N  
Company Secretary &  
Compliance Officer**





## COCHIN SHIPYARD LIMITED

Corporate Identity Number (CIN): L63032KL1972GOI002414

Registered Office: Administrative Building, Cochin Shipyard Premises,  
Perumanoor, Ernakulam, Kerala – 682015

Tel. No: +91 (484) 2361181/2501200 Fax No: +91 (484) 2370897/2383902

E-mail: secretary@cochinshipyard.com Website: www.cochinshipyard.com

**January 04, 2021**

Dear Shareholder,

### **Sub: Interim Dividend 2020-21 – Communication on Tax Deduction at Source (TDS) on Dividend payout**

We are pleased to inform that the Board of Directors of Cochin Shipyard Limited (CSL) at their meeting held today, January 04, 2021, has declared an interim dividend of Rs. 9.00 per equity share for the financial year ended March 31, 2021.

As per the Finance Act 2020, dividend paid and distributed by a company will be taxable in the hands of shareholders with effect from April 01, 2020. Therefore, the Company will be required to deduct taxes at source (TDS) at the rates applicable to each category of shareholder. If you remain as a shareholder as on record date, the dividend receivable by you would be taxable under the Income Tax Act, 1961 (Act) as explained below:

#### **I. Resident shareholders:**

- **TDS would not apply in case of individuals if the aggregate dividend distributed to them during the FY 2020-21 does not exceed Rs. 5,000.**
- Tax at source will not be deducted in cases where a shareholder provides
  - Form 15G (applicable to any person other than a Company or a Firm) - Annexure I
  - Form 15H (applicable to an individual above the age of 60 years) - Annexure II,provided that the eligibility conditions are being met.
- Tax will be deducted at source ("TDS") under Section 194 of the Act @ 7.5% on the amount of dividend payable unless exempted under any of the provisions of the Act.
- If PAN is not submitted, TDS would be deducted @ 20% as per Section 206AA of the Act.
- 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.

We request you to kindly verify the correctness of the records and update the same with your Depository Participant (if you hold shares in dematerialized mode) or the Registrar and Share Transfer Agent (if you hold shares in physical mode), at the earliest. In case you propose to avail the benefit of exemption or lower deduction from withholding tax, and if you

have not submitted the following documents earlier for the purpose of claiming benefit from tax deduction at source or your documents submitted earlier were found to be defective, you should submit all the following documents as prescribed under the Act latest by January 14, 2021 at the portal of the RTA, Link Intime India Private Limited at <https://linkintime.co.in/formsreg/submission-of-form-15g-15h.html>:

Category	Documents required	Remarks
General	Self-attested copy of withholding tax certificate for lower deduction u/s 197	If lower rate of tax is to be claimed
Individual	Duly signed Form 15G or 15H (as may be applicable) along with the self-attested copy of the PAN card	If tax exemption is to be claimed
Insurance Company	Self-declaration* that it has full beneficial interest with respect to shares owned, along with self-attested copy of PAN card and registration certificate	If tax exemption is to be claimed
Mutual Funds	Self-declaration* that they are specified in Section 10(23D) of the Act, along with self-attested copy of PAN card and registration certificate	If tax exemption is to be claimed
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-attested copy of the documentary evidence supporting the exemption status along with self-attested copy of PAN card	If tax exemption is to be claimed
Alternative Investment Fund (AIF) established/incorporated in India	Self-declaration* that its income is exempt under Section 10(23FBA) of the Act and that 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	If tax exemption is to be claimed

\*The format for self declaration is attached as Annexure IV.

## II. Non-Resident shareholders:

- Tax is required to be deducted at source in accordance with the provisions of Section 195 of the Act at applicable rates in force. As per the relevant provisions of the Act, the tax shall be deducted at source @ 20% (plus applicable surcharge and cess) on the amount of dividend payable.

We request you to kindly verify the correctness of the records and update the same with your depository participant (if you hold shares in dematerialized mode) or the Registrar and Share Transfer Agent (if you hold shares in physical mode), at the earliest. In case you propose to avail the benefit of Double Taxation Avoidance Agreement between India and the country of your residence, and if you have not submitted the following documents earlier for the purpose of claiming benefit from tax deduction at source or your documents submitted earlier were found to be defective, you should submit all the following documents as prescribed under the Act latest by January 14, 2021 at the portal of the RTA, Link Intime India Private Limited at <https://linkintime.co.in/formsreg/submission-of-form-15g-15h.html>:

Category of shareholder		Documents
Investments made by routes other than FPI route	Individual	<ul style="list-style-type: none"> <li>• Self attested copy of Tax Residency Certificate issued by the country in which the shareholder is a resident</li> <li>• Form 10F – Annexure III</li> <li>• Self declaration – Annexure IV</li> <li>• Self-attested copy of Lower/ nil withholding tax certificate provided under Section 197 of the Act, if any.</li> </ul>
	Partnerships, Trusts	<ul style="list-style-type: none"> <li>• Self attested copy of Tax Residency Certificate issued by the country in which the shareholder is a resident</li> <li>• Form 10F – Annexure III</li> <li>• List of partners / beneficiaries, their respective shares in the income of the partnership / trust and their respective residential status (if not forming part of TRC)</li> <li>• Self declaration – Annexure IV</li> <li>• Self-attested copy of Lower/ nil withholding tax certificate provided under Section 197 of the Act, if any.</li> </ul>
	Companies	<ul style="list-style-type: none"> <li>• Self attested copy of Tax Residency Certificate issued by the country in which the shareholder is a resident</li> <li>• Form 10F – Annexure III</li> <li>• Proof of satisfaction of LoB wherever required as per treaty (for e.g. in case the foreign company is registered on the stock exchange of the other country -the listing certificate of the company)</li> <li>• Self declaration – Annexure IV</li> <li>• Self-attested copy of Lower/ nil withholding tax certificate provided under Section 197 of the Act, if any.</li> </ul>
Investments made through FPI route	FPIs (if shares are held under the FDI regime)	<ul style="list-style-type: none"> <li>• Self attested copy of Tax Residency Certificate issued by the country in which the shareholder is a resident</li> <li>• Form 10F – Annexure III</li> <li>• Proof of satisfaction of LoB wherever required as per treaty (for e.g. in case the foreign company is registered on the stock exchange of the other country -the listing certificate of the company)</li> <li>• Self declaration – Annexure IV</li> <li>• Self-attested copy of Lower/ nil withholding tax certificate provided under Section 197 of the Act, if any.</li> </ul>
	FPIs (other than above)	<ul style="list-style-type: none"> <li>• Self attested declaration that investment has been made under FPI route</li> <li>• Self-attested copy of Lower/ nil withholding tax certificate provided under Section 197 of the Act, if any.</li> </ul>

The Company is not obligated to apply the beneficial DTAA rates at the time of tax deduction / withholding on dividend amounts. Application of beneficial DTAA rate shall depend upon the completeness and satisfactory review by the Company of the documents submitted by non- resident shareholders.

Tax shall be deducted at source @ 20% (plus applicable surcharge and cess) on dividend paid to Foreign Institutional Investors and Foreign Portfolio Investors under Section 196D of the Act. Such TDS rate shall not be reduced on account of the application of the lower DTAA rate, if any.

Please note that the record date fixed by the Company for the purpose of Interim Dividend 2020-21 is January 14, 2021. Hence, it is requested to upload the aforementioned documents at the portal of the RTA, Link Intime India Private Limited at <https://linkintime.co.in/formsreg/submission-of-form-15g-15h.html> latest by January 14, 2021.

You are also requested to communicate us the changes if any, to the above documents already submitted for the Financial Year 2020-21, during final dividend payout for the Financial Year 2019- 2020. If no such communication is received by us within the prescribed time i.e. January 14, 2021, the documents submitted earlier will be considered for the purpose of TDS as per tax law.

**No communication on the tax determination / deduction shall be entertained after January 14, 2021.**

In case tax on dividend is deducted at a higher rate in the absence of receipt of the aforementioned details / documents, you would still have the option of claiming refund of the excess tax deducted at the time of filing your income tax return by consulting your tax advisor. No claim shall lie against the Company for such taxes deducted. Shareholders will be able to see the credit of TDS in Form 26AS, which can be downloaded from their e-filing account at <https://incometaxindiaefiling.gov.in>.

***Disclaimer: This Communication shall not be treated as an advice from the Company. For the tax related matters shareholders should obtain the tax advice from a tax professional.***

We seek your co-operation in the matter.

Warm regards,

**Syamkamal N**  
Company Secretary  
Cochin Shipyard Limited

## INCOME-TAX RULES, 1962

**FORM NO. 15G**

[See section 197A(1), 197A(1A) and rule 29C]

**Declaration under section 197A(1) and section 197A(1A) to be made by an individual or a person (not being a company or firm) claiming certain incomes without deduction of tax****PART I**

1. Name of Assessee (Declarant)		2. PAN of the Assessee <sup>1</sup>		
3. Status <sup>2</sup>	4. Previous year(P.Y.) <sup>3</sup> (for which declaration is being made)		5. Residential Status <sup>4</sup>	
6. Flat/Door/Block No.	7. Name of Premises	8. Road/Street/Lane	9. Area/Locality	
10. Town/City/District	11. State	12. PIN	13. Email	
14. Telephone No. (with STD Code) and Mobile No.	15 (a) Whether assessed to tax under the Income-tax Act, 1961 <sup>5</sup> :			Yes <input type="checkbox"/>
	(b) If yes, latest assessment year for which assessed			No <input type="checkbox"/>
16. Estimated income for which this declaration is made		17. Estimated total income of the P.Y. in which income mentioned in column 16 to be included <sup>6</sup>		
18. Details of Form No. 15G other than this form filed during the previous year, if any <sup>7</sup>				
Total No. of Form No. 15G filed		Aggregate amount of income for which Form No.15G filed		
19. Details of income for which the declaration is filed				
Sl. No.	Identification number of relevant investment/ account, etc. <sup>8</sup>	Nature of income	Section under which tax is deductible	Amount of income

.....  
*Signature of the Declarant*<sup>9</sup>**Declaration/Verification**<sup>10</sup>

\*I/We..... do hereby declare that to the best of \*my/our knowledge and belief what is stated above is correct, complete and is truly stated. \*I/We declare that the incomes referred to in this form are not includible in the total income of any other person under sections 60 to 64 of the Income-tax Act, 1961. \*I/We further declare that the tax \*on my/our estimated total income including \*income/incomes referred to in column 16 \*and aggregate amount of \*income/incomes referred to in column 18 computed in accordance with the provisions of the Income-tax Act, 1961, for the previous year ending on ..... relevant to the assessment year ..... will be *nil*. \*I/We also declare that \*my/our \*income/incomes referred to in column 16 \*and the aggregate amount of \*income/incomes referred to in column 18 for the previous year ending on ..... relevant to the assessment year ..... will not exceed the maximum amount which is not chargeable to income-tax.

Place: .....

Date: .....

.....  
*Signature of the Declarant*<sup>9</sup>

1. Substituted by IT (Fourteenth Amdt.) Rules 2015, w.e.f. **1-10-2015**. Earlier Form No. 15G was inserted by the IT (Fifth Amdt.) Rules, 1982, w.e.f. 21-6-1982 and later on amended by the IT (Fifth Amdt.) Rules, 1989, w.r.e.f. 1-4-1988, IT (Fourteenth Amdt.) Rules, 1990, w.e.f. 20-11-1990 and IT (Twelfth Amdt.) Rules, 2002, w.e.f. 21-6-2002 and substituted by the IT (Eighth Amdt.) Rules, 2003, w.e.f. 9-6-2003 and IT (Second Amdt.) Rules, 2013, w.e.f. 19-2-2013.

**PART II**

**[To be filled by the person responsible for paying the income referred to in column 16 of Part I]**

1. Name of the person responsible for paying		2. Unique Identification No. <sup>11</sup>	
3. PAN of the person responsible for paying	4. Complete Address		5. TAN of the person responsible for paying
6. Email	7. Telephone No. (with STD Code) and Mobile No.		8. Amount of income paid <sup>12</sup>
9. Date on which Declaration is received (DD/MM/YYYY)		10. Date on which the income has been paid/credited (DD/MM/YYYY)	

Place: .....

.....

Date: .....

*Signature of the person responsible for paying the income referred to in column 16 of Part I*

\*Delete whichever is not applicable.

<sup>1</sup>As per provisions of section 206AA(2), the declaration under section 197A(1) or 197A(1A) shall be invalid if the declarant fails to furnish his valid Permanent Account Number (PAN).

<sup>2</sup>Declaration can be furnished by an individual under section 197A(1) and a person (other than a company or a firm) under section 197A(1A).

<sup>3</sup>The financial year to which the income pertains.

<sup>4</sup>Please mention the residential status as per the provisions of section 6 of the Income-tax Act, 1961.

<sup>5</sup>Please mention "Yes" if assessed to tax under the provisions of Income-tax Act, 1961 for any of the assessment year out of six assessment years preceding the year in which the declaration is filed.

<sup>6</sup>Please mention the amount of estimated total income of the previous year for which the declaration is filed including the amount of income for which this declaration is made.

<sup>7</sup>In case any declaration(s) in Form No. 15G is filed before filing this declaration during the previous year, mention the total number of such Form No. 15G filed along with the aggregate amount of income for which said declaration(s) have been filed.

<sup>8</sup>Mention the distinctive number of shares, account number of term deposit, recurring deposit, National Savings Schemes, life insurance policy number, employee code, etc.

<sup>9</sup>Indicate the capacity in which the declaration is furnished on behalf of a HUF, AOP, etc.

<sup>10</sup>Before signing the declaration/verification, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under section 277 of the Income-tax Act, 1961 and on conviction be punishable-

(i) in a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine;

(ii) in any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine.

<sup>11</sup>The person responsible for paying the income referred to in column 16 of Part I shall allot a unique identification number to all the Form No. 15G received by him during a quarter of the financial year and report this reference number along with the particulars prescribed in

rule 31A(4)(vii) of the Income-tax Rules, 1962 in the TDS statement furnished for the same quarter. In case the person has also received Form No.15H during the same quarter, please allot separate series of serial number for Form No.15G and Form No.15H.

<sup>12</sup>The person responsible for paying the income referred to in column 16 of Part I shall not accept the declaration where the amount of income of the nature referred to in sub-section (1) or sub-section (1A) of section 197A or the aggregate of the amounts of such income credited or paid or likely to be credited or paid during the previous year in which such income is to be included exceeds the maximum amount which is not chargeable to tax. For deciding the eligibility, he is required to verify income or the aggregate amount of incomes, as the case may be, reported by the declarant in columns 16 and 18.



**<sup>1</sup>FORM NO. 15H**

[See section 197A(1C) and rule 29C]

**Declaration under section 197A(1C) to be made by an individual who is of the age of sixty years or more claiming certain incomes without deduction of tax.****PART I**

1. Name of Assessee (Declarant)		2. Permanent Account Number or Aadhaar Number of the Assessee <sup>1</sup>		3. Date of Birth <sup>2</sup> (DD/MM/YYYY)	
4. Previous year(P.Y.) <sup>3</sup> (for which declaration is being made)		5. Flat/Door/Block No.		6. Name of Premises	
7. Road/Street/Lane		8. Area/Locality		9. Town/City/District	
				10. State	
11. PIN	12. Email		13. Telephone No. (with STD Code) and Mobile No.		
14 (a) Whether assessed to tax <sup>4</sup> :				Yes	No
(b) If yes, latest assessment year for which assessed					
15. Estimated income for which this declaration is made					
16. Estimated total income of the P.Y. in which income mentioned in column 15 to be included <sup>5</sup>					
17. Details of Form No.15H other than this form filed for the previous year, if any <sup>6</sup>					
Total No. of Form No.15H filed		Aggregate amount of income for which Form No.15H filed			
18. Details of income for which the declaration is filed					
Sl. No.	Identification number of relevant investment/account, etc. <sup>7</sup>	Nature of income	Section under which tax is deductible	Amount of income	

.....  
*Signature of the Declarant*

1. Substituted by the IT (Fourteenth Amdt.) Rules, 2015, w.e.f. **1-10-2015**. Earlier Form No. 15H was amended by the IT (Fifth Amdt.) Rules, 1982, w.e.f. 21-6-1982, IT (Fifth Amdt.) Rules, 1989, w.r.e.f. 1-4-1988, IT (Fourteenth Amdt.) Rules, 1990, w.e.f. 20-11-1990, IT (Twelfth Amdt.) Rules, 1992, w.e.f. 1-6-1992, IT (Seventh Amdt.) Rules, 1995, w.e.f. 1-7-1995, IT (Thirty-second Amdt.) Rules, 1999, w.e.f. 19-11-1999, IT (Twelfth Amdt.) Rules, 2002, w.e.f. 21-6-2002, IT (Eighth Amdt.) Rules, 2003, w.e.f. 9-6-2003, IT (Fourteenth Amdt.) Rules, 2003, w.e.f. 1-8-2003 and IT (Second Amdt.) Rules, 2013, w.e.f. 19-2-2013.

***Declaration/Verification<sup>8</sup>***

I ..... do hereby declare that I am resident in India within the meaning of section 6 of the Income-tax Act, 1961. I also hereby declare that to the best of my knowledge and belief what is stated above is correct, complete and is truly stated and that the incomes referred to in this form are not includible in the total income of any other person under sections 60 to 64 of the Income-tax Act, 1961. I further declare that the tax on my estimated total income including \*income/incomes referred to in column 15 \*and aggregate amount of \*income/incomes referred to in column 17 computed in accordance with the provisions of the Income-tax Act, 1961, for the previous year ending on ..... relevant to the assessment year ..... will be *nil*.

*Place:* .....

.....

*Date:* .....

*Signature of the Declarant*

## PART II

[To be filled by the person responsible for paying the income referred to in column 15 of Part I]

1. Name of the person responsible for paying		2. Unique Identification No. <sup>9</sup>	
3. Permanent Account Number or Aadhaar Number of the person responsible for paying	4. Complete Address		5. TAN of the person responsible for paying
6. Email	7. Telephone No. (with STD Code) and Mobile No.	8. Amount of income paid <sup>10</sup>	
9. Date on which Declaration is received (DD/MM/YYYY)		10. Date on which the income has been paid/credited (DD/MM/YYYY)	

Place: .....

.....

Date: .....

*Signature of the person responsible for paying the income referred to in column 15 of Part I*

\*Delete whichever is not applicable.

1. As per provisions of section 206AA(2), the declaration under section 197A(1C) shall be invalid if the declarant fails to furnish his valid Permanent Account Number or Aadhaar Number.
2. Declaration can be furnished by a resident individual who is of the age of 60 years or more at any time during the previous year.
3. The financial year to which the income pertains.
4. Please mention “Yes” if assessed to tax under the provisions of Income-tax Act, 1961 for any of the assessment year out of six assessment years preceding the year in which the declaration is filed.
5. Please mention the amount of estimated total income of the previous year for which the declaration is filed including the amount of income for which this declaration is made.
6. In case any declaration(s) in Form No. 15H is filed before filing this declaration during the previous year, mention the total number of such Form No. 15H filed along with the aggregate amount of income for which said declaration(s) have been filed.
7. Mention the distinctive number of shares, account number of term deposit, recurring deposit, National Savings Schemes, life insurance policy number, employee code, etc.
8. Before signing the declaration/verification, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under section 277 of the Income-tax Act, 1961 and on conviction be punishable—

- (i) in a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine;
- (ii) in any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine.

9. The person responsible for paying the income referred to in column 15 of Part I shall allot a unique identification number to all the Form No. 15H received by him during a quarter of the financial year and report this reference number along with the particulars prescribed in rule 31A(4)(vii) of the Income-tax Rules, 1962 in the TDS statement furnished for the same quarter. In case the person has also received Form No.15G during the same quarter, please allot separate series of serial number for Form No.15H and Form No.15G.

10. The person responsible for paying the income referred to in column 15 of Part I shall not accept the declaration where the amount of income of the nature referred to in section 197A(1C) or the aggregate of the amounts of such income credited or paid or likely to be credited or paid during the previous year in which such income is to be included exceeds the maximum amount which is not chargeable to tax after allowing for deduction(s) under Chapter VI-A, if any, or set off of loss, if any, under the head “income from house property” for which the declarant is eligible. For deciding the eligibility, he is required to verify income or the aggregate amount of incomes, as the case may be, reported by the declarant in columns 15 and 17.

<sup>1</sup>**[Provided that such person shall accept the declaration in a case where income of the assessee, who is eligible for rebate of income-tax under section 87A, is higher than the income for which declaration can be accepted as per this note, but his tax liability shall be nil after taking into account the rebate available to him under the said section 87A.]**

---

1. Inserted by Income-tax (4th Amendment) Rules, 2019, w.e.f. **22-5-2019**.

**FORM NO. 10F**

[See sub-rule (1) of rule 21AB]

**Information to be provided under sub-section (5) of section 90 or sub-section (5) of section 90A of the Income-tax Act, 1961**

I, ..... \*son/daughter of Shri..... in the capacity of ..... (designation) do provide the following information, relevant to the previous year..... \*in my case/in the case of..... for the purposes of sub-section (5) of \*section 90/section 90A:—

<i>Sl.No</i>	<i>Nature of information</i>	<i>:</i>	<i>Details #</i>
(i)	Status (individual, company, firm etc.) of the assessee	:	
(ii)	Permanent Account Number or Aadhaar Number of the assessee if allotted	:	
(iii)	Nationality (in the case of an individual) or Country or specified territory of incorporation or registration (in the case of others)	:	
(iv)	Assessee's tax identification number in the country or specified territory of residence and if there is no such number, then, a unique number on the basis of which the person is identified by the Government of the country or the specified territory of which the assessee claims to be a resident	:	
(v)	Period for which the residential status as mentioned in the certificate referred to in sub-section (4) of section 90 or sub-section (4) of section 90A is applicable	:	
(vi)	Address of the assessee in the country or territory outside India during the period for which the certificate, mentioned in (v) above, is applicable	:	

2. I have obtained a certificate referred to in sub-section (4) of section 90 or sub-section (4) of section 90A from the Government of ..... (name of country or specified territory outside India)

Signature: .....

Name: .....

Address: .....

Permanent Account Number or Aadhaar Number .....

### Verification

I ..... do hereby declare that to the best of my knowledge and belief what is stated above is correct, complete and is truly stated.

Verified today the ..... day of.....

.....  
*Signature of the person providing the information*

Place: .....

### Notes :

1. \*Delete whichever is not applicable.
2. #Write N.A. if the relevant information forms part of the certificate referred to in sub-section (4) of section 90 or sub-section (4) of section 90A.

**Annexure IV**

Date : - | |

**To the Company Secretary / Compliance Officer**  
**Cochin Shipyard Limited**

We, **<shareholder name>**, hereby confirm the following:

1. We are a **<insert legal entity status>** having registered address at **<insert registered address>**.
2. The Tax Identification Number / Unique Identification Number as issued by the Government of **<name of the country>** is \_\_\_\_\_
3. We are tax resident of **<name of the country>** in accordance with the provisions of Article 4 of the Double Taxation Avoidance Agreement between India and **<insert country>** (“treaty”)The Self attested copy of Tax Residency Certificate issued by the country in which the shareholder is a resident issued by \_\_\_\_\_ is attached herewith. We further confirm that we are entitled to claim the benefits of the treaty between the two countries,taking into consideration the Multilateral Instrument (‘MLI’) signed by both the countries,including, but not limited to, satisfaction of the “Principal Purpose Test”provided in such MLI.
4. We do not/ will not have any ‘Permanent Establishment’ in India as envisaged under Article 5 of the treaty during the period 1 April 2020 to 31 March 2021. [not applicable for individuals]
5. We are the beneficial owner of the dividends declared, distributed or paid by **<insert company name>** to us. Specifically, we confirm that we will have exclusive possession and control over the dividend received, and that we have the absolute discretion to utilise the dividend received without being constrained by any contractual, legal or other arrangement to pass on such dividends to any other person.
6. We hereby confirm that we do/ will not have a place of effective management, during the period 1 April 2020 to 31 March 2021, in India and none of the key management and commercial decisions for the conduct of business in substance are/ will be made in India.
7. Our e-mail id \_\_\_\_\_ and contact number is \_\_\_\_\_ respectively.

We hereby certify that declarations made above are true and *bona fide*. In case of any change in the declaration on any of the above aspects, we undertake to promptly intimate you of the said event.

We also undertake to provide all additional documents/ information, as may be prescribed/required by the Indian Revenue authorities, in order to substantiate any of the above aspects.

We further agree to indemnify, defend and hold good the **Cochin Shipyard Limited**. from any liability (including towards tax, interest and penalty) that may arise, or may be asserted against **Cochin Shipyard Limited** with respect to the availability of treaty benefits (including under the MLI) in respect of such dividends.

Yours sincerely,

For **<shareholder name>**

Authorised Signatory

Name : << Name of person signing declaration>>

Designation : << Designation of person signing declaration>>