

Ref: MLLSEC/82/2024

Date: 13 June 2024

To,

BSE Limited,
(Security Code: 540768)

Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400 001

National Stock Exchange of India Ltd.,
(Symbol: MAHLOG)

Exchange Plaza, 5th Floor, Plot No. C/1,
“G” Block, Bandra-Kurla Complex,
Bandra (East), Mumbai – 400 051

Sub: Communication to Shareholders: Dividend for FY 2023-24 – Intimation on Tax Deduction at Source (TDS) / withholding tax on Dividend

Pursuant to the Finance Act, 2020, with effect from 1 April 2020, Dividend Distribution Tax has been abolished and dividend income has become taxable in the hands of the Shareholders.

In this regard, please find enclosed herewith an e-mail communication being sent to all the shareholders of the Company whose e-mail IDs are registered with the Company or Company's Registrar and Share Transfer Agent viz. Link Intime India Private Limited or Depository Participants, explaining the provisions of withholding tax on dividends, prescribed rates, declarations to be submitted, as may be applicable.

This communication is also being uploaded on the Company's website at <https://mahindralogistics.com/shareholder-information>.

Thanking you,

For Mahindra Logistics Limited

Jignesh Parikh
Company Secretary
Enclosure: As above



MAHINDRA LOGISTICS LIMITED

- **Registered Office:** Mahindra Towers, P. K. Kurne Chowk, Worli, Mumbai - 400 018.
- **Corporate Office:** 10th & 11th Floor, Arena Space, Near Majas Bus Depot, Jogeshwari Vikhroli Link Road, Jogeshwari (East), Mumbai – 400 060.
- **Website:** www.mahindralogistics.com • **E-mail:** cs.mll@mahindralogistics.com
 - **Phone:** +91 22 2490 1441 / +91 22 6836 7900
 - **CIN:** L63000MH2007PLC173466 • **ISIN Number:** INE766P01016

THIS COMMUNICATION IS IMPORTANT AND REQUIRES YOUR IMMEDIATE ATTENTION

Date: 13 June 2024

Dear Shareholder,

Sub.: Communication on deduction of tax at source on Final Dividend recommended for the financial year ended 31 March 2024

We hope this communication finds you and your families in the best of health.

We are pleased to inform you that the Board of Directors of Mahindra Logistics Limited (“the Company”), at their Meeting held on 22 April 2024, have recommended a Final Dividend of Rs. 2.50/- per equity share of face value of Rs. 10/- each fully paid (i.e. 25% on face value) for the Financial Year (“FY”) ended 31 March 2024. The recommended final dividend is subject to the approval of the Shareholders at the ensuing 17th Annual General Meeting (“AGM”) of the Company scheduled to be held on Monday, 22 July 2024.

The Final Dividend for FY 2023-24, if approved and declared at the ensuing AGM will be paid through permitted modes, on or after Tuesday, 23 July 2024 to those Shareholders whose names appear in the Register of Members of the Company or List of beneficial owners maintained by the Depositories as at the close of business hours of Friday, 12 July 2024 (Record Date).

Please note that details as available on the Record Date in the Register of Members/List of beneficial owners will be relied upon by the Company, for the purpose of complying with the applicable withholding tax provisions and payment of the Final Dividend, if declared.

All Shareholders are requested to kindly ensure that details such as Permanent Account Number (“PAN”), residential status, category of shareholder, e-mail ID, full bank account details (IFSC, MICR etc.), postal address are updated, in their respective demat account(s) maintained with the Depository Participant(s) (“DP”), on or before Friday, 12 July 2024 for seamless electronic payout and receipt of subsequent communications on dividend.

In terms of the provisions of the Income Tax Act, 1961 (“the IT Act”), as amended by the Finance Act, 2020, dividends paid or distributed by a company after 1 April 2020 are taxable in the hands of the Shareholders.

Accordingly, the Company shall deduct tax at source (“TDS”) at rates (plus surcharge and cess), as applicable, at the time of making the payment of the Final Dividend, if approved and declared at the ensuing AGM.

This communication provides a brief of the applicable TDS provisions under the IT Act for Resident and Non-Resident Shareholder categories:

RESIDENT INDIVIDUAL SHAREHOLDERS:

Category	TDS rate
Shareholders who have registered their valid PAN details with the DP/RTA	10%*
Shareholders who do not hold a valid PAN; or Shareholders who have not registered their valid PAN with the DP/RTA; or Shareholders whose PAN is not linked with Aadhar/classified as specified person as per Section 206AB in the income-tax portal	20%*

***Notes**

- No TDS will be deducted in case the total dividend paid (PAN clubbed) during FY 2024-25 does not exceed Rs. 5,000/-;
- No TDS will be deducted for shareholder who provides Form 15G (for individuals [Click here](#) to download Form 15G or Form 15H (for individuals above the age of 60) [Click here](#) to download Form 15H duly filled up in all respects is submitted (through registered e-mail ID) along with self-attested copy of the PAN. Please note all fields are mandatory to be filled up and the Company may at its sole discretion reject the form if it does not fulfil the requirements of the law;
- Nil/Lower TDS will be deducted subject to submission by the Shareholder of self-attested copy of PAN and tax exemption certificate issued by the Income Tax department under Section 197 of the IT Act.

RESIDENT NON-INDIVIDUAL SHAREHOLDERS:

No tax shall be deducted on the dividend payable to the following Resident Non-Individual Shareholders where they provide self-declaration ([Click here](#) to download) with details and documents as given below:

Category of Shareholder	Exemption provided under	Documentation
Mutual Funds	Section 196(iv) of the IT Act	Self-declaration that they are specified Mutual Funds under Section 10(23D) of the IT Act and self-attested copy of PAN and SEBI Registration certificate may be voluntarily submitted.
Insurance Companies	Section 194 of the IT Act	Self-declaration that it qualifies as 'Insurer' as per Section 2(7A) of the Insurance Act, 1938 and has full beneficial interest with respect to shares owned and self-attested copy of PAN and Insurance Regulatory and Development Authority (IRDAI)/LIC/GIC; registration certificate may be voluntarily submitted.
Category I and II Alternate Investment Fund ("AIF")	Section 197A(1F) of the IT Act read with Notification No. 51/2015 dated 25 June 2015	Self-declaration that income is exempt under Section 10(23FBA) of the IT Act and self-attested copy of PAN and SEBI Registration AIF certificate may be voluntarily submitted.

Recognised Provident Fund Approved Superannuation Fund Approved Gratuity Fund	Circular 18/2017 dated 29 May 2017	Self-attested copy of PAN and valid order/approval of commissioner as per Circular No. 18/2017 issued by Central Board of Direct Taxes.
New Pension System (“NPS”) Trust or any other authorities as mentioned under Section 10 of the IT Act	Section 197A(1E) of the IT Act	Self-declaration that it qualifies as NPS Trust and income is eligible for exemption under Section 10(44) of the IT Act and being regulated by the provisions of the Indian Trusts Act, 1882 along with self-attested copy of the PAN.
Government (Central/State)	Section 196(i) of the IT Act	No TDS required to be deducted.
IFSC Units of a Finance Company, Finance unit and Broker Dealer opting to claim deduction u/s 80LA(1A)/80LA(2)	Notification no. 28/2024 dated 07 March 2024	Self-attested copy of PAN and Self-declaration in Form 1 in accordance with the notification no. 28/2024 dated 07 March 2024 issued by CBDT
Any other Resident Non-Individual Shareholder	-	Valid self-attested documentary evidence substantiating exemption from deduction of TDS needs to be submitted along with self-attested copy of the PAN.

Nil/Lower TDS will be deducted subject to submission by the Shareholder of self-attested copy of PAN and tax exemption certificate issued by the Income Tax department under Section 197 of the IT Act.

NON-RESIDENT SHAREHOLDERS

Taxes are required to be withheld in accordance with the provisions of Section 195 of the IT Act as per the rates as applicable. As per the relevant provisions of the IT Act, the withholding tax shall be at the rate of 20% (plus surcharge and cess, as applicable) on the amount of dividend payable to Non-Resident Shareholders.

However, Non-Resident Shareholders have an option to claim and be governed by the provisions of the Double Tax Avoidance Agreement (“DTAA”) between India and the country of tax residence of the Shareholder, if they are more beneficial to them.

In order to avail tax treaty benefits, Non-Resident Shareholders are required to submit ALL of the below documents:

- Self-attested true copy of Tax Residency Certificate (“TRC”) for the period 1 April 2024 to 31 March 2025, obtained from the tax authorities of the country of which the Shareholder is resident;

- Self-declaration in Form 10F - (It is mandatory to file Form 10F electronically on the Indian Income Tax web portal for non-resident shareholders having PAN in India or required to obtain PAN in India.) ([Click here](#) to download);
- Self-attested true copy of the PAN, if allotted by the Indian Income Tax authorities;
- Self-declaration (on letterhead) in the format prescribed by the Company ([Click here](#) to download), certifying, inter-alia, the following points:
 1. Shareholder is a tax resident of the country of its residence during the Financial Year;
 2. Shareholder is eligible to claim the beneficial DTAA rate for the purposes of withholding tax on dividend declared by the Company;
 3. Shareholder has no reason to believe that its claim for the benefits of the DTAA is impaired in any manner;
 4. Shareholder does not have a taxable presence or a Permanent Establishment (“PE”) in India during 1 April 2024 to 31 March 2025. In any case, the amounts paid/payable to the Shareholder are not attributable or effectively connected to the PE or fixed base, if any, which may have got constituted otherwise;
 5. Shareholder is the ultimate beneficial owner of its shareholding in the Company and dividend receivable from the Company;
 6. Non-resident Shareholder is satisfying the Principle Purpose Test as per the respective tax treaty effective 1 April 2020 (if applicable);
 7. Self-declaration by the Shareholder regarding the satisfaction of the Place of Effective Management (POEM), Principal Purpose Test, General Anti-avoidance Rule (GAAR), Simplified Limitation of Benefit test (wherever applicable), as regards the eligibility to claim recourse to concerned DTAA;
- In case of Foreign Institutional Investors and Foreign Portfolio Investors, copy of SEBI registration certificate.

It is recommended that Shareholders should independently satisfy their eligibility to claim DTAA benefit including meeting of all conditions laid down by DTAA. Please note that 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 the Non-Resident Shareholder.

HIGHER TDS FOR NON-FILERS OF INCOME TAX RETURN (“ITR”)

The provisions of Section 206AB require the deductor to deduct tax at higher of the following rates from the amount paid/credited to a ‘specified person’;

1. Twice the rate specified in the relevant provision of the Act; or
2. Twice the rate or rates in force; or
3. The rate of 5%.

A ‘specified person’ is a person who has not filed the Income Tax Return (ITR) for the preceding Financial Year, and the income tax return (not belated return) filing due date has expired and total amount of tax deducted or collected (TDS and TCS) in the last Financial Year is Rs. 50,000 or more.

The Non-Resident Shareholder who does not have permanent establishment is excluded from the scope of specified person.

As directed by the Central Board of Direct Taxes vide Circular No. 11 of 2021 dated 21 June 2021, the Company will be using the functionality of the Income-tax department to determine the applicability of Section 206AB of the Act.

SHAREHOLDERS HAVING MULTIPLE ACCOUNTS UNDER DIFFERENT STATUS/CATEGORY

Shareholders holding shares of the Company 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 the PAN will be considered on their entire holding in different accounts.

IN CASE WHERE DIVIDEND IS ASSESSABLE TO TAX IN HANDS OF PERSON OTHER THAN THE REGISTERED SHAREHOLDER

In terms of Rule 37BA of the Income Tax Rules 1962, if dividend income on which tax will be deducted at source is assessable in the hands of a person other than the registered Shareholder as on the book closure date, then the registered Shareholder is required to submit a signed declaration (on letterhead) containing the name, address, PAN, residential status/category of the person to whom TDS credit is to be given and reasons for giving credit to such person, on or before Friday, 12 July 2024 ([Click here](#) to download format).

Please note that no request in this regard would be accepted/considered by the Company/RTA after the said date.

SUBMISSION OF TAX RELATED DOCUMENTS

Shareholders can submit their tax exemption forms and supporting documents as mentioned herein above along with the self-attested copy of PAN directly on the web-portal of the RTA <https://liiplweb.linkintime.co.in/formsreg/submission-of-form-15g-15h.html> or send over e-mail to mlldivtax@linkintime.co.in / cs.mll@mahindralogistics.com on or before Friday, 12 July 2024 to enable the Company to determine and deduct appropriate tax. No communication on tax determination/tax deduction/request to pass on credit to person other than registered Shareholder, shall be entertained post Friday, 12 July 2024.

For all self-attested documents, Shareholders must mention on the document “certified true copy of the original”. For all documents being uploaded by the Shareholder, the Shareholder undertakes to send the original document(s) on request by the Company.

The Company would deduct tax on dividend at a higher rate in case of absence of receipt of aforementioned documents/incompleteness/discrepancy in documents without any further communication. In such cases, the Shareholder would still have an option to file the return of income and claim appropriate refund, if eligible. No claim shall lie against the Company for such taxes deducted.

Application of TDS rate is subject to necessary verification by the Company of the details as available with the Company/RTA.

In case of joint Shareholders, the Shareholder named first in the Register of Members/Benpos is required to furnish the requisite documents for claiming any applicable beneficial tax rate.

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

The Company is obligated to deduct TDS based on records available with the RTA on the book closure date and no request will be entertained for revision of TDS return.

The tax credit can be viewed by Shareholders in Form 26AS/Annual Tax Statement by logging in with their credentials at TRACES <https://www.tdscpc.gov.in/app/login.xhtml> or the e-filing website of the Income Tax department of India <https://www.incometax.gov.in/iec/foportal/>.

UPDATION OF BANK ACCOUNT DETAILS

In order to facilitate receipt of dividend directly in your bank account, Shareholders are requested to ensure that their bank account details (IFSC Code, MICR etc.), PAN, KYC and nominations in their respective demat accounts (with the DP) / physical folios (with the RTA in [Form ISR-1](#)) are updated, to enable the Company to make timely credit of dividend in their bank accounts.

Incomplete and/or unsigned forms, declarations and documents will not be considered by the Company for granting any exemption.

In case of any queries, you may write to cs.mll@mahindralogistics.com or rnt.helpdesk@linkintime.co.in

[Click here](#) to download - 15H

[Click here](#) to download - 15G

[Click here](#) to download - self declaration (Non-Individual Resident shareholder)

[Click here](#) to download - self declaration (Non-Resident shareholder)

[Click here](#) to download - 10F

[Click here](#) to download - Declaration under Rule 37BA(2) for passing TDS credit to beneficial shareholder

[Click here](#) to download - self-declaration in Form 1

[Click here](#) to download – Form ISR-1

The self-declarations and forms referred above can also be downloaded from the website of the Company at <https://mahindralogistics.com/shareholder-information/>.

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

Your co-operation in this regard is highly solicited.

Thanking you

For **Mahindra Logistics Limited**

Jignesh Parikh

Company Secretary

Membership No.: ACS 20413

Note: This is a system generated e-mail. Hence does not require any signature. Please do not reply to this e-mail, as this e-mail id is not monitored.