

Subject: APM Industries Limited–Communication on Tax Deduction at Source (TDS) on Final Dividend for Financial Year 2023-24



IS/ISO 9001 - 2000

APM INDUSTRIES LIMITED

Registered Office: SP-147, RIICO Industrial Area, Bhiwadi, District Khairthal-Tijara, Rajasthan-301019

Corporate Office: 910, Chiranjiv Tower-43, Nehru Place, New Delhi - 110019

E-mail: csapmindustriestd@gmail.com, Website: www.apmindustries.co.in

CIN No.: L21015RJ1973PLC015819, Phone No. 011-26441015-18

August 23, 2024

Dear Shareholder,

We are pleased to inform you that the Board of Directors of APM Industries Limited (“the Company”), in their meeting held on May 24, 2024, recommended a final dividend of INR 0.50/- (i.e. 25%) per equity share of the face value of INR 2/- each for the financial year ended March 31, 2024, subject to approval of shareholders at the ensuing Annual General Meeting (“AGM”).

The dividend, if approved by the shareholders, will be paid/dispatched within 30 days from the date of AGM to shareholders holding equity shares of the Company, either in electronic or in physical form as on the record date i.e. **Friday, September 13, 2024** for determining eligibility of shareholders to receive the dividend.

In terms of the provisions of the Income Tax Act, 1961, as amended by the Finance Act, 2020 (“the Act”), dividend paid or distributed by a Company on or after April 1, 2020 is taxable in the hands of the shareholders. The Company shall, therefore, be required to deduct tax at source at the prescribed rates at the time of payment of dividend. The deduction of tax at source will be based on the residential status, category of shareholders and subject to fulfilment of conditions as provided under the Act.

SECTION A: FOR ALL SHAREHOLDERS – UPDATION OF DETAILS, AS APPLICABLE

All shareholders are requested to ensure that the below information and details are completed and/or updated, as applicable, in their respective demat account(s) maintained with the Depository participant(s) or in case of shares held in physical form, with Skyline Financial Services Private Limited, Company’s Registrar and Share Transfer Agent (“RTA”), on or before the Record Date i.e., **Friday, September 13, 2024**.

Please note that the following information & details, if already registered with the RTA and Depositories, as the case may be, will be relied upon by the Company, for the purpose of complying with the applicable TDS provisions:-

- Valid Permanent Account Number (PAN)*.
- Residential status as per the Act i.e., Resident or Non-Resident for the Financial Year 2024-25.
- Category of the Shareholder viz. Mutual Fund, Insurance Company, Alternate Investment Fund (AIF) Category I and II, AIF Category III, Government (Central/State Government), Foreign Portfolio Investor (FPI)/Foreign Institutional Investor (FII): Foreign Company, FPI/FII: Others (being Individual, Firm, Trust, Artificial Juridical Person, etc.), Individual, Hindu Undivided Family (HUF), Firm, Limited Liability Partnership (LLP), Association of Persons (AOP), Body of Individuals (BOI) or Artificial Juridical Person, Trust, Domestic Company, Foreign Company, Overseas Corporate Bodies, etc.
- Email Address.
- Residential Address.

SECTION B: TDS PROVISIONS AND DOCUMENTS REQUIRED, AS APPLICABLE FOR RELEVANT CATEGORY OF SHAREHOLDER(S)

Shareholders are requested to take note of the TDS rates and document(s), if any, required to be submitted to the Company via e-mail at csapindustriesltd@gmail.com by **Monday, September 16, 2024** for their respective category, in order to comply with the applicable TDS provisions.

FOR RESIDENT SHAREHOLDERS:-

Category of shareholders	Exemption applicability/Documentation requirement
Mutual Funds	No TDS is required to be deducted as per Section 196(iv) of the Act, subject to specified conditions. Self-attested copy of valid SEBI registration certificate needs to be submitted.
Insurance Companies	No TDS is required to be deducted as per Section 194 of the Act, subject to specified conditions. Self-attested copy of valid IRDAI registration certificate needs to be submitted.
Category I and II Alternative Investment Fund	No TDS is required to be deducted as per Section 197A(1F) of the Act, subject to specified conditions. Self-attested copy of valid SEBI registration certificate needs to be submitted.
Recognized Provident Fund	No TDS is required to be deducted as per Circular No.18/2017, subject to specified conditions. Self-attested copy of a valid Order from Commissioner under Rule 3 of Part A of Fourth Schedule to the Act, or self-attested valid documentary evidence (e.g. relevant copy of registration, notification, order, etc.) in support of the provident

	fund being established under a scheme framed under the Employees' Provident Funds Act, 1952 needs to be submitted.
Approved Superannuation Fund	No TDS is required to be deducted as per Circular No.18/2017, subject to specified conditions. Self-attested copy of valid approval granted by Commissioner under Rule 2 of Part B of Fourth Schedule to the Act needs to be submitted.
Approved Gratuity Fund	No TDS is required to be deducted as per Circular No.18/2017, subject to specified conditions. Self-attested copy of valid approval granted by Commissioner under Rule 2 of Part C of Fourth Schedule to the Act needs to be submitted.
National Pension Scheme	No TDS is required to be deducted as per Section 197A(1E) of the Act.
Government (Central/State)	No TDS is required to be deducted as per Section 196(i) of the Act.
Any other entity entitled to exemption from TDS	Valid self-attested documentary evidence (e.g., relevant copy of registration, notification, order, etc.) in support of the entity being entitled to TDS exemption needs to be submitted.
Other resident shareholder	<p>(a) TDS is required to be deducted at the rate of 10% under Section 194 of the Act.</p> <p>Rate of TDS @10% under Section 194 of the Act is subject to provisions of Section 206AB of Act which provides for TDS in respect of non-filers of income-tax return. As provided in Section 206AB of the Act, tax is required to be deducted at the highest of following rates in case of payments to specified persons:-</p> <ul style="list-style-type: none"> • 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%. <p>As per Central Board of Direct Taxes vide Circular No. 11 of 2021 dated 21st June 2021, for determining TDS rate on Dividend, the Company will be using functionality of the Income-tax department to determine the applicability of Section 206AB of the Act.</p> <p>Your PAN available in the database of the RTA/ Depository as on the record date will be considered by the Company for the purpose of tax deduction at source and the relevant tax compliances. The specified person who has not submitted PAN and/or has not filed the income-tax returns; the tax shall be deducted at the higher of the two rates prescribed in Section 206AA and Section 206AB of the Act.</p>

	<p>(b) In case the dividend is not exceeding Rs. 5,000 in a fiscal year to resident individual shareholder then no tax will be deducted from the dividend. If any resident individual shareholder is in receipt of Dividend exceeding Rs. 5,000 in a fiscal year, entire dividend will be subject to applicable rate of tax.</p> <p>(c) No TDS is required to be deducted on furnishing of valid Form 15G (for individuals, with no tax liability on total income and income not exceeding maximum amount which is not chargeable to tax) or Form 15H (for individual above the age of 60 years with no tax liability on total income).</p> <p>- CLICK AT https://www.apmindustries.co.in/wp-content/uploads/2024/08/Form-No.-15G-Pdf.pdf TO DOWNLOAD FORM 15G (PDF)</p> <p>-CLICK AT https://www.apmindustries.co.in/wp-content/uploads/2024/08/Form-No.-15H-Pdf.pdf TO DOWNLOAD FORM 15H (PDF)</p> <p>- CLICK AT https://www.apmindustries.co.in/forms-for-tds-exemption/ TO DOWNLOAD FORM 15G/15H (WORD)</p> <p>(d) TDS is required to be deducted at the rate of 20% under Section 206AA of the Act, if valid PAN of the shareholder is not available* / PAN is not linked with Aadhaar number.</p> <p>(e) TDS is required to be deducted at the rate prescribed in the lower tax withholding certificate issued under Section 197 of the Act, if such valid certificate is provided.</p>
--	--

**If the PAN is not as per the database of the Income-tax Portal, it would be considered as invalid PAN.*

FOR NON-RESIDENT SHAREHOLDERS:-

Category of shareholders	Category of shareholders
Non-resident shareholders [Including Foreign Institutional Investors (FIIs) / Foreign Portfolio Investors (FPIs)]	TDS is required to be deducted at the rate of 20% (plus applicable surcharge and cess) under Section 196D or 195 of the Act, as the case may be. Further, in case you are identified as a “Specified Person” under Section 206AB of the Act then we request you to submit self-declaration for not having permanent establishment in India as per tax law so that tax can be deducted as per the applicable provisions of Income Tax Act, 1961.
	Or

Further, as per Section 90 of the Act, a non-resident shareholder has the option to be governed by the provisions of the Double Tax Avoidance Treaty between India and the country of tax residence of the shareholder, if they are more beneficial to them. For this purpose, i.e., to avail Tax Treaty benefits, the non-resident shareholders will have to provide the following:-

- Self-attested copy of the PAN allotted by the Indian Income Tax authorities, if available;
- Self-attested copy of valid Tax Residency Certificate obtained from the tax authorities of the country of which the shareholder is a resident;
- Electronic Form 10F; and

- CLICK AT <https://www.apmindustries.co.in/wp-content/uploads/2024/08/Process-Note-for-filing-of-Electronic-Form-10F.pdf> FOR PROCESS NOTE FOR FILING OF ELETRONIC FORM 10F

- Self-declaration in the attached format certifying:-

(i) shareholder is and will continue to remain a tax resident of the country of its residence during the Financial Year 2024-25;

(ii) shareholder is eligible to claim the beneficial DTAA rate for the purposes of tax withholding on dividend declared by the Company;

(iii) shareholder has no reason to believe that its claim for the benefits of the DTAA is impaired in any manner;

(iv) shareholder is the ultimate beneficial owner of its shareholding in the Company and dividend receivable from the Company; and

(v) shareholder does not have a taxable presence or a permanent establishment in India during the Financial Year 2024-25.

- CLICK AT <https://www.apmindustries.co.in/wp-content/uploads/2024/08/Declaration-for-Non-Residents-PDF.pdf> TO DOWNLOAD DECLARATION (PDF)

- CLICK AT <https://www.apmindustries.co.in/forms-for-tds-exemption/> TO DOWNLOAD DECLARATION (WORD)

Any entity/individual entitled to exemption from TDS	TDS is required to be deducted at the rate prescribed in valid lower tax withholding certificate issued under Section 197 of the Act, if such certificate is provided. Or Valid self-attested documentary evidence (e.g., relevant copy of registration, notification, order, etc. by Indian tax authorities) in support of the entity being entitled to exemption from TDS is to be submitted.
---	---

Notes:-

1. All the above referred tax rates will be enhanced by surcharge and cess, wherever applicable.
2. For all self-attested documents, shareholders must mention on the document “certified true copy of the original”. For all documents being submitted by the shareholders, the shareholder undertakes to send the original document(s) on the request by the Company.
3. In case, the dividend income is assessable to tax in the hands of a person other than the registered Shareholder as on the Record Date, the registered shareholder is required to furnish a declaration containing the name, address, PAN of the person to whom TDS credit is to be given and reasons for giving credit to such person on or before **Monday, September 16, 2024**. No request in this regard would be accepted by the Company/RTA after the said date.
4. 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 should consult with their own tax advisors for the tax provisions that may be applicable to them.
5. We shall arrange to email the soft copy of TDS certificate at your registered email ID in due course, post payment of the dividend.
6. 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, 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 taxes deducted.
7. 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.

SUBMISSION OF TAX RELATED DOCUMENTS:-

The aforesaid documents such as Form 15G/15H, documents under Section 196, 197A, etc. can be submitted by Resident Shareholders and Non Resident Shareholders to the Company via e-mail at csapmindustriesltd@gmail.com on or before **Monday, September 16, 2024** to enable the Company to determine the appropriate TDS / withholding tax rate applicable. Any communication on the tax determination/deduction received post **Monday, September 16, 2024** shall not be considered.

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

For seeking any further clarification, please write to us at csapmindustriesltd@gmail.com.

Your co-operation in this regard is solicited.

Yours truly,

For APM Industries Limited

Sd/-

Neha Goel

Company Secretary