

Non-Resident Shareholder

For non-resident shareholders, income tax is required to be withheld (WHT) from consideration of buyback in accordance with the provisions of Section 195 or Section 196D or any other applicable sections of the Income Tax Act, 1961 as dividend. The withholding tax shall be at the rate of 20% (plus applicable surcharge and cess) or as notified by the GOI.

Non- resident shareholders may also provide a Lower Tax Deduction Certificate (LTDC) certificate issued by the Income Tax Department under Section 195 or any other section of the IT Act, which authorizes the company to deduct WHT at a lower rate instead of the standard prescribed rate under IT Act.

However, as per Section 90 of the IT Act, non-resident shareholders can avail the provisions of certain Double Tax Avoidance Agreement (DTAA) provided they satisfy conditions such as non-applicability of the General Anti-Avoidance Rule (“GAAR”), read with Multilateral Instrument (MLI), between India and the country of tax residence of the shareholders, if such DTAA has beneficial provisions with respect to buyback consideration which are considered payable as dividend and shareholders fulfill all requirements of DTAA. For this purpose, i.e. to avail benefits under the DTAA read with MLI, non-resident shareholders will have to provide all the following documents on or before the last date of tendering of offer:

- Copy of the PAN card allotted by the Indian income tax authorities duly attested by the shareholders or details as prescribed under rule 37BC of the Income-tax Rules, 1962 in absence of PAN Card – [Annexure 1](#).
- Copy of the Tax Residency Certificate for financial year 2025-26 obtained from the revenue or tax authorities of the country of tax residence, duly attested by shareholders / authorized signatory
- Electronic Form 10F as per notification no. 03/2022 dated July 16, 2022 issued by the Central Board of Direct Tax Notification can be read under [-notification-no-3-2022-systems.pdf \(incometaxindia.gov.in\)](#). Form 10F has to be obtained electronically through the e-filing portal of the Indian income tax website at <https://www.incometax.gov.in/iec/foportal>.
- Self-declaration of beneficial ownership of equity shares by the non-resident shareholder- [Annexure 2](#)
- Self-declaration by the shareholders of having no permanent establishment in India in accordance with the applicable tax treaty and IT Act- [Annexure 3](#)
- Self-declaration of beneficial ownership of equity shares by the non-resident shareholder.
- Self-declaration of fulfilling all conditions of tax treaty for been eligible to claim benefit of the tax treaty (DTAA) read with Multilateral Instrument (MLI).
- Any other documents as prescribed under the IT Act for lower withholding of taxes, if applicable, duly attested by the shareholders.

Kindly note that extending the benefit of tax treaty (DTAA) would depend on the documents submitted.

Alternatively, the prescribed forms or documents can also be downloaded in link given [here](#).

All the documents submitted by you will be verified by us and we will consider the same while deducting the appropriate taxes if they are in accordance with the provisions of the Income Tax Act, 1961.

You are requested to communicate the changes, if any, to the documents already submitted for the financial year 2025-26. If no such communication is received before the closure of portal, the tax documents submitted earlier, if any, will be considered for the purpose of tax deduction at source as per tax law. If during the financial year any of the above-mentioned Tax Forms becomes invalid, then tax would be deducted on total dividend payments including buyback consideration made during the financial year 2025-26 at standard prescribed rates under the Income Tax Act from Buyback consideration.

You may note that the Company has notified record for the purpose of determining the entitlement and the names of equity shareholders who are eligible to participate in the buyback as November 14, 2025, to the stock exchanges.

The above-mentioned documents can be uploaded on the Shareholder's Portal till the last date of tendering of offer. The portal can be accessed at <https://www.infosys.com/investors/shareholder-services/tax-buyback2025.html>. Documents submitted after last date of tendering of offer will not be considered for Buyback 2025. We request you to kindly take note accordingly. In the absence of any tax documents from shareholders the Tax deduction at source would be done at the standard prescribed rates under Income Tax Act.

Shareholders are requested to register their email addresses, bank account details and mobile numbers with their respective Depository Participant (Demat banker). If the shares are held in physical mode kindly update the details with KFin Technologies Limited (Company's RTA) at inward.ris@kfintech.com.

Please reach out to us at buyback.tax@infosys.com for any queries.

Wishing you a safe stay.

Thanking you,

For Infosys Limited