Shareholder Communication

Sub: Final Dividend 2020 - Communication on Tax Deduction at Source (TDS) on Dividend payout.

Dear Shareholder,

We hope this communique finds you safe and in good health.

The Board of Directors of Infosys limited (the Company) in their meeting held on April 20, 2020 has recommended a final dividend of Rs. 9.50/- per equity share for the financial year ended March 31, 2020 subject to shareholder's approval at the ensuing Annual General Meeting.

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 1, 2020. Therefore, the Company shall be required to deduct taxes at source (TDS) at the rates applicable to each category of shareholder.

As per the latest information available with the depositories (NSDL/CDSL) or by Registrar and Share Transfer Agent (KFin Technologies Private Limited), you are a **Non-Resident** shareholder of the company. If you remain as a shareholder as on record date, the dividend receivable by you would be taxable under the Income Tax Act, 1961. 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, you should submit all the following documents as prescribed under the Income Tax Act, 1961:

- a. Copy of Tax Residency Certificate (TRC) for the FY 2020- 2021 obtained from the revenue authorities of the country of your residence. duly attested by yourself/ authorized signatory.
- *b.* Self-Declaration in Form 10F for Financial Year 2020-21 to provide information under section 90 *Annexure 1.*
- c. Copy of the PAN Card allotted by the Indian Income Tax authorities duly attested by yourself/authorized signatory.
- d. Self-declaration of Beneficial Ownership *Annexure -2*.
- e. Self-declaration for not having Permanent Establishment in India in accordance with the applicable Tax Treaty Annexure -3
- f. Any other documents as prescribed under the Income tax act for lower withholding of taxes if applicable.

If the above documents are found in accordance with the provisions of the Income Tax Act, 1961 the same shall be considered while deducting the taxes.

You may note that the Company on May 15, 2020 has notified record date for the purposes of Final Dividend 2019-20 as **June 1, 2020 to** the stock exchanges. The above said documents can be uploaded on the shareholder's portal between June 1, 2020 to June 15, 2020. The portal can be

accessed at <u>https://www.infosys.com/investors/shareholder-services/dividend-tax.html</u>. No documents will be considered after June 15, 2020. We request you to kindly take note accordingly.

Please reach out to us at <u>dividend.tax@infosys.com</u> for any queries.

Wishing you a safe stay.

Thanking you,

For Infosys Limited

<u>Annexure -1</u>

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

..... for

the purposes of sub-section	(5)	of section	90/section	90A:
-----------------------------	-----	------------	------------	------

SI.No.	Nature of information	:	Details#
(i)	Status (individual, company, firm etc.) of the assessee	:	
(<i>ii</i>)	Permanent Account Number (PAN) of the assessee if allotted by Income Tax Department of India.	:	
(iii)	Nationality (in the case of an individual) or Country or specified territory of incorporation or registration (in the case of others)		
<i>(iv)</i>	Assessee' s Income tax identification number in the country or specified territory of Tax Residence.	:	
(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/We have obtained a certificate to in sub-section (4) of section 90 of sub-section (4) of section 90A from the Government of (name of country or specified territory outside India)

Signature:

Name:

Address:

Email and Telephone:

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.

<u>Annexure – 2</u>

Self-declaration of Beneficial ownership

(To be declared by non-resident shareholder for availing the benefits of lower tax deduction under Section 90 of the Indian Income Tax Act read with the provisions of the Double Tax Avoidance Treaty with India read along with Multilateral Instrument)

To,

Infosys Limited

Bangalore, India

I/We, [.....] do hereby solemnly declare as follows:

I/We am/are a resident in [.....Insert name of country of which the shareholder is tax resident]. I am a Non-Resident of India as per Tax Laws of India.

I am/We are the beneficial owner of the investments made by me/us in in the Shares of Infosys Limited and also any income receivable by me/us from such investments.

Declaration under Multilateral Instrument (MLI) (*Strick out relevant para if not applicable*)

• Article 7(1) - Principal Purpose Test (PPT)

I/We hereby declare that the investments made by me/us in the Shares of Infosys Limited are not arranged in a manner which results in obtaining a tax benefit, whether directly or indirectly, as one of its principal purposes. The tax benefit, if any, derived from such investments would be in accordance with the object and purpose of the relevant provisions of the Double Taxation Avoidance Agreement between India and [.....Insert name of country of which the shareholder is tax resident]

• Article 7(8) - Simplified Limitation of Benefits Test (SLOB)

I, being an individual, am a qualified person pursuant to Article 9(a) of the Multilateral Instrument.

Or,

We hereby declare that we are a qualified person as defined through paragraphs 9 to 13 to Article 7 of the Multilateral Instrument. The specific paragraph under which I/we am/are a qualified person is paragraph[9(b)/(c)/(d)/(e); 10; 11; or 12]

• Article 8 – Period of holding of Investment.

I am/We are the beneficial owner of the investments made by me/us in the Shares of Infosys Limited for an uninterrupted period of 365 days prior to and including the date of payment of the dividends.

I/We undertake to intimate Infosys Limited immediately in case of any alteration in the aforesaid declaration including change in tax residential status, etc.

I, [.....], hereby declare that the contents above are correct, complete and truly stated.

(Name, designation & signature of Non-resident Shareholder)

Company Seal (if applicable)

Date:

Place:

Address:

Email and Telephone:

<u>Annexure -3</u>

<u>Self-declaration of income not effectively connected to any permanent establishment in</u> <u>India</u>

(To be declared by non-resident shareholder for availing the benefits of lower tax deduction under Section 90 of the Indian Income Tax Act read with the provisions of the Double Tax Avoidance Treaty with India read along with Multilateral Instrument)

To,

Infosys Limited

Bangalore, India

I/We, [.....] do hereby solemnly declare as follows:

I/We am/are a resident in [.....Insert name of country of which the shareholder is tax resident]. I am a Non-Resident of India as per Tax Laws of India.

I am/We declare that the dividend income receivable by me/us from investment in the shares of Infosys Limited is not effectively connected to any permanent establishment in India.

I/We undertake to intimate Infosys Limited immediately in case of any alteration in the aforesaid declaration including change in tax residential status, etc.

I, [.....], hereby declare that the contents above are correct, complete and truly stated.

Company Seal (if applicable)

Date:

Place:

Address:

Email and Telephone:

⁽Name, designation & signature of non-resident Shareholder)