

ASTRAL LIMITED

(Formerly Known as Astral Poly Technik Limited)

CIN: L25200GJ1996PLC029134

REGISTERED OFFICE: "ASTRAL HOUSE", 207/1, B/H RAJPATH CLUB, OFF. S

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2nd November, 2021

COMMUNICATION ON TAX DEDUCTED AT SOURCE ON PAYMENT OF DIVIDEND

Dear Shareholder,

We are happy to inform you that the Board of Directors at their Meeting to be held on 11th November, 2021 shall consider the declaration of Interim Dividend on Equity Share of face value of Re. 1/- each for the financial year 2021-22. The Record Date for the determining the shareholders entitled for payment of interim dividend shall be 19th November, 2021. The Interim Dividend, if declared, shall be paid to the entitled shareholders on or after 20th November, 2021.

As you are aware that as per the Income-tax Act, 1961 (ACT), as amended by the Finance Act, 2020, dividends paid or distributed by the Company after 1st April 2020 shall be taxable in the hands of the Shareholders. Your Company shall therefore be required to deduct tax at source (TDS) at the time of making payment of the above said Dividend.

This communication summarizes the applicable TDS provisions in accordance with the provisions of the Income Tax Act, 1961, for various categories, including Resident or Non-Resident members and the manner of submission of required forms/documents.

1. For resident Shareholders:

SI. No.	Category of Shareholder	TDS Rate (Read with notes below)	Exemption/applicability /Documents required (if any)
(a)	Resident Member with Valid PAN	10%	Tax will be deducted at source ("TDS") under Section 194 of the Act on the amount of dividend payable unless exempt under any of the provisions of the Act
			Update/Verify the PAN, and the residential status as per Income Tax Act, 1961 if not already done, with the depositories (in case of shares held in demat mode) and with the

(b)	Resident	NIL	Company's Registrar and Transfer Agents i.e Bigshare Services Private Limited (in case of shares held in physical mode). In case of Individuals, TDS would not apply if
	Individual Member		the aggregate of total dividend paid to them by the Company under folio(s) during FY 2021-22 does not exceed Rs.5,000/
(c)	Resident Individual Member Submitting Form 15G/ Form 15H	NIL	Declaration in Form 15G (for individuals, with no tax liability on total income and income not exceeding maximum amount which is not chargeable to tax) / Form 15H (for individual above the age of 60 years with no tax liability on total income for the FY2021-22). Documents required • Self-attested Duly filled declaration in Form 15G/15H
(d)	Resident Member Submitting Order under Section 197 of the Income Tax Act, 1961 (Act)	Rate provided in the Order	Lower/NIL rate of tax as specified in exemption certificate for the FY 2021-22 obtained from tax authority Document required: • Exemption certificate issued by the Income-tax Department
(e)	Mutual Fund specified under clause (23D) of Section 10 of the Income Tax Act, 1961	NIL	 Self-declaration that it is registered with SEBI and is notified under Section 10 (23D) of the Act Self-attested copy of PAN card and Certificate of registration with SEBI
(f)	An Insurance Company exempted under Section 194 of the Income Tax Act, 1961	NIL	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 the shares owned by it Self-attested copy of PAN card Certificate of registration with Insurance Regulatory and Development Authority (IRDA)/ LIC/ GIC
(g)	Alternative Investment Fund (AIF) established in India	NIL	Self-declaration that its income is exempt under Section 10 (23FBA) of the Act and they are registered with SEBI as Category I or Category II AIF Self-attested copy of the PAN card Certificate of AIF registration with SEBI
(h)	Entities exempt under Section 10 of the Act :	NIL	Document required:

(i)	Benefit under Rule 37BA	Rates based on the status of the	Self-attested copy of documentary evidence supporting the exemption from TDS (entities as provided in Circular No.18 of 2017) Self-attested copy of the PAN card. In case where shares are held by Clearing Member/ intermediaries/ stock brokers and TDS is to be applied by the Company in the DAN.
		beneficial	TDS is to be applied by the Company in the PAN of the beneficial shareholders, then TDS will be
		owners	deducted in beneficial shareholders PAN,
			subject to receipt of following documents Document required:
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			 Self attested copy of declaration as per ANNEXURE 1.
			• List of beneficial owners in the format
			prescribed as ANNEXUE 1A.
			In case of absence of receipt of documents as specified, the company will deduct TDS in the
			PAN of Clearing Member/ intermediaries/ stock
(j)	Resident	20%	brokers at applicable rate NA
	shareholders without PAN/Invalid PAN/ Deleted PAN/ non-compliance of Section 206AB	2070	TVA

2. For Non-Resident shareholders:

SI.	Category of	TDS Rate	Exemption/applicability
No.	Shareholder	(Read with notes	/Documents required (if any)
		below)	
(a)	Any non-	20% (plus	Update/Verify the PAN and the
	resident	applicable	residential status as per Income Tax Act,
	shareholder	surcharge and	1961, if not already done, with the
	(including	cess)	depositories (in case of shares held in
	Foreign	OR	demat mode) and with the Company's
	Institutional	Tax Treaty Rate	Registrar and Transfer Agents i.e
	Investors,	(whichever is	Bigshare Services Private Limited (in
	Foreign Portfolio	<u>lower)</u> provided	case of shares held in physical mode).
	Investors (FII,	documents are	
	FPI))	received	As per Section 90 of the Act, a non-
		(In case of non-	resident shareholder has an option to be
		compliance of	governed by the provisions of the Double
		Section 206AB,	Taxation Avoidance Agreement ('DTAA')
		TDS will be	between India and the country of tax

		deducted at applicable higher rate)	,
			 Form 10F duly filled and signed (Format attached as Annexure 2. self-attested copy of the PAN card Completed and duly signed Self-declaration from Non-resident as per Annexure 3 In case of Foreign Institutional Investors and Foreign Portfolio Investors copy of SEBI registration certificate
			It is recommended that shareholders should independently satisfy its eligibility to claim DTAA benefit including meeting of all conditions laid down by DTAA. Application of beneficial DTAA rate shall depend upon the completeness and satisfactory review by the Company of the documents submitted by the Non-Resident shareholders. The Company will apply its sole discretion and is not obligated to apply the beneficial DTAA rates for tax deduction on dividend payable to shareholders. In case of non-residents falling under category as mentioned in note 3.1 below, please provide following document • self-attested copy of the PAN card • No PE in India declaration
(b)	Submitting Order u/s 197 (i.e. lower or NIL withholding tax certificate)	Rate provided in the Order	Lower/NIL withholding tax certificate obtained from tax authority to be submitted.

* Notes:

- Shareholders holding shares under multiple accounts under different status/ category (eg. Resident and Non-Resident) 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.
- 2. Recording of the Permanent Account Number (PAN) for the registered Folio/DP ID-Client ID is mandatory. In the absence of valid PAN, tax will be deducted at a higher rate of, as per Section 206AA read with 206AB of the Act.
- 3. TDS to be deducted at higher rate in case of non-filers of Return of Income:

For Shareholders who are identified as "Specified Persons" under Sec 206AB of the Act, higher tax rate as applicable would be deducted if

- a. Shareholder has not filed the returns of income for both of the two assessment years relevant to the two previous years immediately before the previous year in which tax is required to be deducted/ collected.
- b. Aggregate of tax deducted at source and tax collected at source is rupees fifty thousand or more in each of these two previous years.

For the purpose of TDS, Company will verify the status (i.e., Specified Person or not) from the Government enabled online facility and deduct TDS accordingly. It may be noted that as per sections 206AB, the specified persons shall not include a non-resident who does not have a permanent establishment in India.

3.1 Provision related to "Specified person" shall not apply to non-resident who does not have a permanent establishment in India.

For the purpose of TDS, Company will verify the status (i.e., Specified Person or not) from the Government enabled online facility and deduct TDS accordingly. It may be noted that as per sections 206AB, the specified persons shall not include a non-resident who does not have a permanent establishment in India.

For the attention of all Shareholders:

Shareholders may make an online submission of Form 15G / 15H and Form 10F, along with the requisite supporting documents (scanned copies) as mentioned above, as applicable, on the website of Bigshare Services Private Limited, the Company's Registrar and Share Transfer Agent ("**Bigshare**") at www.bigshareonline.com. The Shareholders may also download these forms from Bigshare's website and send: (a) physical copies of the duly filled forms / documents mentioned above to Bigshare's Registered Office at 1st Floor, Bharat Tin Works Building, Opp. Vasant Oasis, Makwana Road, Marol, Andheri (East), Mumbai – 400 059, Maharashtra, or (b) scanned copies of the duly filled forms / other documents to Bigshare's e-mail ID tds@bigshareonline.com and dividend@astralpipes.com.

The aforesaid declarations and documents need to be submitted by the Shareholders so as to reach Bigshare on or before Friday, 19th November, 2021 by 11.59 p.m. (IST).

It may please be noted that Forms received after the said date and incomplete or incorrect forms shall not be considered and shall not be eligible for non-deduction or lower deduction of tax.

The URL for downloading the aforesaid forms from the website of Bigshare is: https://www.bigshareonline.com/Resources.aspx

All the forms are available in under the heading "Forms & Procedures".

By submission of Form 15G / 15H and Form 10F, along with the requisite supporting documents, the Shareholder is deemed to confirm to the Company that:

- a. the Shareholder satisfies the requisite criteria for submission of the same and takes full responsibility for availing the TDS deduction exemption;
- b. the Company or Bigshare will not be held responsible / liable and no claims shall lie against them in this regard;
- c. the online submission of the Form 15G/Form 15H (if made) shall be deemed to have been signed by the Shareholder.

The Company will arrange to email a soft copy of TDS Certificate to the Shareholder at the Shareholder's registered e-mail ID in due course.

It may be further noted that in case the tax on said dividend is deducted at a higher rate in absence of receipt of the aforementioned details / documents from a Shareholder, there would still be an option available with such Shareholder to file the return of income and claim an appropriate refund, if eligible.

All communications/ queries in this respect should be addressed to the RTA, Bigshare Services Private Limited on their e-mail address investor@bigshareonline.com

Further, Shareholders holding shares in physical mode and who have not registered / updated their email addresses with the Company are requested to update their email addresses with Bigshare. Shareholder holding shares in dematerialized mode are requested to register / update their e-mail addresses with the relevant Depository Participant(s).

Shareholders holding shares in physical mode, who have not provided the information regarding bank particulars, are requested to register/update their Bank details (e.g. name of the bank and the branch, bank account number, 9 digits MICR number, 11 digit IFS Code and the nature of account) online with Bigshare on its website (at www.bigshareonline.com) along with the copy of the signed request letter mentioning the name and address of the Shareholder, scanned copy of the Share Certificate (front and back), self-attested copy of the PAN Card, and self-attested copy of any document (e.g.: Driving License, Election Identity Card, Passport) in support of the address of the Shareholder along with a copy of latest cancelled cheque with the Shareholder's name. Shareholders holding shares in electronic mode are requested to register their Bank details with the relevant Depository Participant. This will enable the Company to make timely credit of dividend to the Shareholders in their respective bank accounts, especially in view of the prevailing COVID-19 pandemic. For Shareholders who have not updated their bank account details, Dividend Warrants / Demand Drafts will be sent to their registered addresses upon normalization of the postal services.

<u>Disclaimer</u>: This communication shall not be treated as an advice from the Company or its affiliates or Bigshare Services Private Limited. Shareholders should obtain the tax advice related to their tax matters from a tax professional.

We request for your kind co-operation in this regard.

For Astral Limited

Sd/-Krunal Bhatt Company Secretary