



PNC INFRA TECH LIMITED

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COMMUNICATION ON DEDUCTION OF TAX AT SOURCE ON DIVIDEND

The Board of Directors of PNC Infratech Limited (hereinafter referred to as 'PNC' or 'the Company'), at its Meeting held on Tuesday, May 19, 2026, have recommended a Final Dividend of Rs. 0.60/- (Rupee Sixty Paise only) per Equity Share having face value of Rs. 2/- each for the Financial Year ('FY') ended March 31, 2026, subject to the approval of the shareholders.

In accordance with the provisions of the Income Tax Act, 2025 ('the Act'), the dividend declared and paid by the Company is taxable in the hands of shareholders. The Company shall, therefore, be required to deduct Tax at Source ('TDS') at the applicable rates on the dividend paid to its shareholders. The TDS rate would vary depending on the category and residential status of the shareholder and the documents submitted and duly accepted by the Company.

The documents as applicable to each category of shareholder (mentioned below) have to be uploaded on the portal of MUFG Intime India Pvt. Ltd., Registrar and Share Transfer Agent of the Company at <https://web.in.mpms.mufg.com/formsreg/submission-of-Form-121-41.html> on or before **Friday, September 18, 2026, at 17:00 P.M. (IST)**.

The Company have furnished below applicable TDS rate for dividend in respect of each category of shareholders and documentation to be furnished, wherever applicable.

A. RESIDENT SHAREHOLDERS:

A.1 Tax deductible at source for Resident Shareholders

No tax will be deducted on payment of dividend to the resident individual shareholder if the total dividend, paid during Financial year ('FY') 2026-27 does not exceed INR 10,000/-.

A.2 Tax deductible at source for RESIDENT SHAREHOLDER (OTHER THAN RESIDENT INDIVIDUAL SHAREHOLDER RECEIVING DIVIDEND NOT EXCEEDING INR 10,000/- DURING FY 2026-27)

S. No.	Particulars	WHT rate	Declaration(s)/ Documents
1	Valid PAN updated with the Depository Participant in case shares are held in dematerialized form; or Registrar and Transfer Agent ('RTA') in case shares are held in physical form and no exemption sought by Resident shareholder	10%	N.A.

2	No / Invalid PAN with the Depository Participant in case shares are held in dematerialized form; or RTA in case shares are held in physical form and no exemption sought by shareholders	20%	Please note that where the shareholder being resident individual eligible for obtaining Aadhaar Number have not linked the Aadhaar Number allotted with its PAN, such PAN would be treated as inoperative for the provisions of deduction of TDS and a higher TDS rate of 20% will be considered while distributing dividend
3	Availability of lower/nil tax deduction certificate issued by Income Tax Department u/s 395(1) of the Act	Rate specified in Lower tax withholding certificate obtained from Income Tax Department	• Copy of PAN card; and • Copy of lower tax withholding certificate obtained from Income Tax Department

A.3 NIL TAX-DEDUCTIBLE AT SOURCE/ NIL WITHHOLDING on dividend payment to Resident Shareholders if the Shareholders submit documents mentioned in the below table with the Company/ RTA:

S. No.	Particulars	Declaration / documents required
1	Resident Individual furnishing Form 121	• Copy of PAN card • Declaration in Form No. 121. Please refer <i>Annexure A</i> for format of Form 121.
2	Shareholders covered u/s 393(4) [Table: SI No. 10] such as LIC, GIC, etc.	• Copy of PAN card • Self-declaration (<i>Refer Annexure B enclosed separately with this communication</i>), along with adequate documentary evidence (e.g., registration certificate), to the effect that no tax withholding is required.

3	Persons Covered under Section 393(5) of the Act (e.g. Govt., RBI, Corporations established by Central Act and exempt from income tax)	• Self-attested copy of PAN, wherever applicable; • Self- declaration in the format prescribed in <i>Annexure C</i> for mutual funds and <i>Annexure D</i> for others; and • Registration/ exemption certificate substantiating applicability of section 393(5) of the Act.
4	Category I and II Alternative Investment Fund (AIF)	• Copy of PAN card • Self-declaration in the format prescribed in <i>Annexure B</i> stating that AIF's income is exempt under Schedule V (Table: Sl. No. 1) of the Act and they are governed by SEBI regulations as applicable to Category I or Category II AIFs, • Copy of registration certificate.
5	Any other entity exempts from withholding tax under the Act (including those mentioned in Circular No. 18/2017 issued by CBDT)	• A self- declaration in the format as prescribed in <i>Annexure D</i> (except for individual Sikkimese resident) • Submit declaration in <i>Annexure E</i> in case of individual Sikkimese resident • Adequate documentary evidence, substantiating the type of the entity.

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B. NON-RESIDENT SHAREHOLDERS:

Tax deductible at source/ tax withholding for non-resident shareholders.

S. No.	Category	Withholding Tax rate	Declaration / documents required
1	Foreign Institutional Investors (FIIs) / Foreign Portfolio Investors (FPIs)	20% (plus applicable surcharge and cess) OR Tax treaty rate** (whichever is beneficial)	Shareholders may also apply for a lower TDS rate as per the relevant Double Taxation Avoidance Agreements ('DTAA'), if the following documents are submitted: • Copy of Indian Tax Identification number ('PAN'). In case PAN not available, details specified in Annexure F to be provided; • Tax Residency Certificate (TRC)^ obtained from the tax authorities of the country of which the shareholder is a resident, valid for Financial Year ('FY') 2026-27 (covering the period from 01 April 2026 to 31 March 2027); • Form 41 filed electronically over the Income tax portal • Self-declaration for FY 2026-27 (covering the period from 01 April 2026 to 31 March 2027) in the format as specified in Annexure G on shareholder's letterhead, primarily (not exclusive list) covering the following: (a) Non-resident is eligible to claim the benefit of respective tax treaty (b) Non-resident receiving the dividend income is the beneficial owner of such income (c) Dividend income is not attributable/ effectively connected to any Permanent Establishment (PE) or Fixed Base in India.
2	Alternative Investment Fund – Category III or Retail Scheme/ Exchange Traded Fund located in International Financial Services Centre	10% (plus applicable surcharge and cess)	• Copy of PAN card (if available) • Self-declaration (Refer Annexure H, enclosed separately with this communication) along with adequate documentary evidence substantiating the nature of the entity

3	Other Non-resident shareholders (except those who are tax residents of Notified Jurisdictional Area)	20% (plus applicable surcharge and cess) OR Tax treaty rate** (whichever is beneficial)	Shareholders may apply for a lower TDS rate as per the relevant Double Taxation Avoidance Agreements ('DTAA'), if the following documents are submitted: • Copy of Indian Tax Identification number ('PAN'). In case PAN not available, details specified in Annexure F to be provided; • Tax Residency Certificate (TRC)^ obtained from the tax authorities of the country of which the shareholder is a resident, valid for Financial Year ('FY') 2026-27 (covering the period from 01 April 2026 to 31 March 2027); • Form 41 filed electronically over the Income tax portal. • Self-declaration for FY 2026-27 (covering the period from 01 April 2026 to 31 March 2027) in the format as specified in Annexure G on shareholder's letterhead, primarily (not exclusive list) covering the following: (a) Non-resident is eligible to claim the benefit of respective tax treaty (b) Non-resident receiving the dividend income is the beneficial owner of such income (c) Dividend income is not attributable/ effectively connected to any Permanent Establishment (PE) or Fixed Base in India.
4	Non-Resident Shareholders who are tax residents of Notified Jurisdictional Area as defined u/s 176(1) of the Act	30%	NA
5	Sovereign Wealth funds and Pension funds notified by Central Government under Schedule V (Table: Sl. No. 7) of the Act	NIL	• Copy of the notification issued by CBDT substantiating the applicability of Schedule V (Table: Sl. No. 7) of the Act issued by the Government of India. • Self-Declaration [Refer Annexure I (applicable for Sovereign Wealth funds)/ Annexure J (applicable for Pension funds) enclosed separately with this communication] that the conditions specified in Schedule V (Table: Sl. No.

			7) have been complied with
6	Subsidiary of Abu Dhabi Investment Authority (ADIA) as prescribed under Schedule V (Table: Sl. No. 7) of the Act	NIL	Self-Declaration (<i>Refer Annexure K enclosed separately with this communication</i>)- substantiating the fulfillment of conditions prescribed under Schedule V (Table: Sl. No. 7) of the Act
7	Availability of Lower/NIL tax deduction certificate issued by Income Tax Department u/s 395(1) or 395(2) of the Act	Rate specified in Lower tax withholding certificate obtained from Income Tax Department	Copy of the lower tax withholding certificate obtained from Income Tax Department

^ In case, the TRC is furnished in a language other than English, the said TRC would have to be translated from such other language to English language and thereafter duly notarized and apostilled copy of the TRC would have to be provided.

*** The beneficial Tax Treaty rates will not automatically apply at the time of tax deduction/ withholding on dividend amounts. Application of beneficial Tax Treaty Rate shall depend upon the completeness and satisfactory review by the Company of the documents submitted by the non-resident shareholders. In case the documents are found to be incomplete, the Company reserves the right to not consider the tax rate prescribed under the tax treaty.*

Notes:

1. In case of joint shareholders, the shareholder named first in the Register of Members is required to furnish the requisite documents for claiming any applicable beneficial tax rate. In case, the joint owners wish to get the credit of TDS on their name separately please provide declaration under Rule 203 of Income Tax Rules, 2026. **(Please download the Link given as Annexure L)**
2. Recording of the valid Permanent Account Number (PAN) in the records of Company/ RTA is mandatory. In the absence of valid PAN, tax will be deducted at a higher rate of 20% as per Section 397 of the Act.
Further, if the PAN is not as per the database of the Income-tax Portal, it would be considered an invalid PAN.
3. In the event of a mismatch in the category of shareholder (individual, company, trust, partnership, local authority, Government, Association of Persons etc.) as per the register of members and as per fourth letter of PAN (10-digit alpha-numeric number), the Company would consider fourth letter of PAN for determining the category of shareholders and the applicable tax rate/ surcharge/ education cess.
4. Shareholders may note that in case the tax on said dividend is deducted at a higher rate in absence of receipt or insufficiency of the aforementioned details/documents from you, an option is available to you to file the return of income as per Income Tax Act, 2025 and claim an appropriate refund, if eligible. No claim shall lie against the Company for such taxes deducted.

5. Shareholders can check the credit of TDS in Form 168 by login in to e-filing portal of Income Tax.
6. The aforesaid documents such as Form 121, documents under section 393(5), 393(6), FPI Registration Certificate, Tax Residency Certificate, Lower Tax certificate etc. can be uploaded at <https://web.in.mpms.mufig.com/formsreg/submission-of-Form-121-41.html> on or before Friday, September 18, 2026, at 17:00 P.M. (IST) to enable the Company to determine the appropriate withholding tax rate applicable. In case where copy of documents (such as, PAN card, Registration certificate, etc.) is provided, the copy should be self-attested by the Shareholder or its authorized signatory. Any communication in relation to tax rate determination/deduction received post Friday, September 18, 2026, at 17:00 P.M. (IST) shall not be considered.
7. Shareholders holding shares under multiple accounts under different residential status / category and single PAN, may note that, higher of the tax rate as applicable to different residential status/ category will be considered for their entire shareholding under different accounts.
8. In the event of any income tax demand (including interest, penalty, etc.) arising from any misrepresentation, inaccuracy or omission of information provided by the shareholder, the shareholder will be responsible to indemnify the Company and provide the Company with all information / documents and co-operation in any tax proceedings.
9. In case of any discrepancy in documents submitted by the shareholder, the company will deduct tax at the highest rate applicable, without any further communication in this regard.
10. In terms of Rule 203 of Income Tax Rules, 2026, if dividend income on which tax has been deducted at source is assessable in the hands of a person other than the deductee, then deductee should file declaration with Company in manner prescribed by Rules. ***(Please download the Link given as Annexure L)***
11. This Communication is not exhaustive and does not purport to be a complete analysis or listing of all potential tax consequences in the matter of dividend payment. Shareholders should consult their tax advisors for requisite action to be taken by them.