

HEG LIMITED

CIN: L23109MP1972PLC008290

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Corporate Office: Bhilwara Towers, A-12, Sector – 1, Noida – 201 301 (U.P.)

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THIS COMMUNICATION IS IMPORTANT AND REQUIRES YOUR IMMEDIATE ATTENTION

Date: 11th June, 2024

Name:

DPID/Client ID/Folio no.

Dear Shareholder,

Subject: Intimation / Communication in respect to Deduction of Tax at Source on Final Dividend for Financial Year 2023-24

Trust you and your family are safe and in good health!

We are pleased to inform you that the Board of Directors of the Company, at its meeting held on 22nd May, 2024, have recommended a final dividend of Rs.22.50 per Equity Share of the Face Value of Rs.10 each (i.e. 225%) for the financial year 2023-24, subject to the approval of the Shareholders at the ensuing 52nd Annual General Meeting (“AGM”) of the Company. The dividend will be paid / dispatched within 30 days from the date of the ensuing AGM of the Company.

As you are aware, as per the Income Tax Act, 1961 (the Act), as amended by the Finance Act, 2020, dividends paid or distributed by a company on or after 1st April, 2020 shall be taxable in the hands of the shareholders. The Company shall therefore be required to deduct tax at source at the time of making the payment of the dividend, if approved, at the ensuing AGM of the Company.

In view of the above, the Company shall be deducting TDS as per applicable TDS rates on dividend to be paid to Shareholders.

The withholding tax rate would vary depending on the residential status, category of the shareholder and is subject to provision of requisite declarations / documents provided by the concerned shareholder to the Company.

This communication provides a brief of the applicable Tax Deduction at Source (TDS) provisions under the Act for Resident and Non-Resident shareholder categories.

A. RESIDENT SHAREHOLDERS:

A.1 Tax deductible at source for Resident Shareholders

No tax shall be deducted on payment of dividend to the resident individual shareholder if the total dividend, paid during financial year ('FY') 2024-25, does not exceed INR 5,000/-.

The shareholders are advised to update their PAN with the Depository Participant, if shares are held in demat form, or with the Registrar and Share Transfer Agent of the Company, if shares are held in Physical form. The address of Registrar and Share Transfer Agent (RTA) of the Company is as under:

M/s. MCS Share Transfer Agent Limited
(Unit: HEG Limited)
F-65, First Floor, Okhla Industrial Area, Phase-I,
New Delhi-110020
Phone: 011-41406149 – 52, Fax: 011-41709881
E-mail Id: helpdeskdelhi@mcsregistrars.com

TDS to be deducted at higher rate in case of non-linkage of PAN with Aadhaar:

As per Section 139AA of the Act, every person who has been allotted a PAN and who is eligible to obtain Aadhaar, shall be required to link the PAN with Aadhaar. In case of failure to comply with this, the PAN allotted shall be deemed to be invalid/inoperative and tax shall be deducted at the rate of 20% as per the provisions of Section 206AA of the Act.

Sr. No.	Particular	Withholding tax rate	Declaration / Documents required
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 Shareholder	10%	No Documents Required
2	No PAN / Invalid PAN with the Depository Participant in case shares are held in dematerialized form; or RTA in case shares are held in physical form, shareholders classified as specified person as per the Income Tax portal and no exemption sought by Shareholder.	20%	No Documents Required
3	Availability of lower/nil tax deduction certificate issued by Income Tax Department u/s 197 of the Act	Rate specified in Lower tax withholding certificate obtained from Income Tax Department	<ul style="list-style-type: none">• Self-attested Copy of PAN card• Self-attested Copy of lower tax withholding certificate

			obtained from Income Tax Department
4	Self-declaration that income-tax return for immediately preceding the financial year (i.e. FY 2022-23) have been filed.	Rate would be as follows: <ul style="list-style-type: none"> • If Return filed – 10% • If Return not filed – 20% 	<ul style="list-style-type: none"> • Self-declaration <i>(Please download the Link given as Annexure 1, at the end of this communication)</i>

A.2 No Tax shall be Deducted at Source on dividend payment to Resident Shareholders if the Shareholders submit documents mentioned in the below table with the Company on or before 1st July, 2024.

S. No.	Particular	Declaration / documents required
1	An Individual furnishing Form 15G/ 15H	<ul style="list-style-type: none"> • Self-attested Copy of PAN card • Declaration in Form No. 15G (applicable to an individual who is less than 60 years) / Form 15H (applicable to an Individual who is 60 years and above), fulfilling prescribed conditions. <i>(Please download the Link given as Annexure 2 and 3, at the end of this communication)</i>
2	Shareholders to whom section 194 of the Act does not apply such as LIC, GIC, Business Trust as defined u/s 2 (13A) etc.	<ul style="list-style-type: none"> • Self-attested Copy of PAN card • Self-declaration <i>(Please download the Link given as Annexure 1, at the end of this communication)</i>, along with adequate documentary evidence (e.g, Registration certificate), to the effect that the no tax withholding is required as per provisions of section 194 of the Act.
3	Shareholder covered u/s 196 of the Act such as Government, RBI, Mutual Funds specified u/s 10(23D), corporations established by Central Act and exempt from Income Tax.	<ul style="list-style-type: none"> • Self-attested Copy of PAN card • Self-declaration <i>(Please download the Link given as Annexure 1, at the end of this communication)</i>, along with adequate documentary evidence, substantiating applicability of section 196 of the Act.
4	Category I and II Alternative Investment Fund (AIF)	<ul style="list-style-type: none"> • Self-attested Copy of PAN card • Self-declaration <i>(Please download the Link given as Annexure 1, at the end of this communication)</i> that AIF's income is exempt under Section 10 (23FBA) of the Act and they are governed by SEBI regulations as applicable to Category I or Category II AIFs, along with copy of AIF registration certificate with SEBI.

5	Any other entity exempt from withholding tax under the provisions of section 197A of the Act (including those mentioned in Circular No. 18/2017 issued by CBDT)	<ul style="list-style-type: none"> • Self-attested Copy of PAN card • Self-declaration (<i>Please download the Link given as Annexure 1 and 4, at the end of this communication</i>) along with adequate documentary evidence, substantiating the nature of the entity • Copy of the lower tax withholding certificate obtained from Income Tax Department (<i>except those covered by Circular No.18/2017</i>)
6	New Pension System Trust	<ul style="list-style-type: none"> • Self-attested Copy of PAN card • Self-declaration (<i>Please download the Link given as Annexure 1, at the end of this communication</i>) that Trust's income is exempt under Section 10(44) of the Act and being regulated by the provisions of the Indian Trusts Act, 1882 • Copy of registration certificate.

B. NON-RESIDENT SHAREHOLDERS:

Tax deductible at source for non-resident shareholders shall be as per following table.

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	<ul style="list-style-type: none"> • Self-declaration (<i>Please download the Link given as Annexure 5, at the end of this communication</i>) along with adequate documentary evidence substantiating the nature of the entity. • To avail beneficial rate of tax treaty following tax documents would be required: <ol style="list-style-type: none"> 1. Self-attested Copy of PAN card (if available) 2. Copy of Tax Residency Certificate (TRC) valid as on the AGM date for the FY 2024-25 or the calendar year 2024 obtained from the tax authorities of the country of which the shareholder is resident. 3. Copy of E-filed Form 10F on the https://eportal.incometax.gov.in/.

			<p>4. Self-declaration for no permanent establishment / fixed base / business connection in India, place of effective management, beneficial ownership and eligibility to avail tax treaty benefit [on shareholder's letterhead] (Please download the Link given as Annexure 7, at the end of this communication).</p> <p>5. Copy of SEBI registration certificate</p> <p>6. In case of Shareholder being tax resident of Singapore, please furnish the letter issued by the competent authority or any other evidence demonstrating the non-applicability of Article 24 - Limitation of Relief under India-Singapore DTAA.</p> <p><i>(Note: It is recommended that Shareholders should independently satisfy their eligibility to claim DTAA benefit including meeting of all conditions laid down by DTAA. Application of beneficial Tax Treaty Rate shall depend upon the completeness and satisfactory review by the Company of the documents submitted by the 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).</i></p>
2	Alternative Investment Fund – Category III located in International Financial Services Centre	10% (plus applicable surcharge and cess)	<ul style="list-style-type: none"> • Self-attested Copy of PAN card (if available) • Self-declaration (Please download the Link given as Annexure 6, at the end of 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 DTAA Tax Treaty Rate whichever is beneficial	<p>To avail beneficial rate of tax treaty following tax documents would be required:</p> <ol style="list-style-type: none"> 1. Self-attested Copy of PAN card (if available) 2. Copy of Tax Residency Certificate (TRC) valid as on the AGM date for the FY 2024-25 or the calendar year 2024

			<p>obtained from the tax authorities of the country of which the shareholder is resident.</p> <ol style="list-style-type: none"> 3. Copy of E-filed Form 10F on the https://eportal.incometax.gov.in/. 4. Self-declaration for no permanent establishment / fixed base / business connection in India, place of effective management, beneficial ownership and eligibility to avail tax treaty benefit [on shareholder's letterhead] (Please download the Link given as Annexure 7, at the end of this communication). 5. In case of Shareholder being tax resident of Singapore, please furnish the letter issued by the competent authority or any other evidence demonstrating the non-applicability of Article 24 - Limitation of Relief under India-Singapore DTAA. <p><i>(Note: It is recommended that Shareholders should independently satisfy their eligibility to claim DTAA benefit including meeting of all conditions laid down by DTAA. Application of beneficial Tax Treaty Rate shall depend upon the completeness and satisfactory review by the Company of the documents submitted by the 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).</i></p>
4	Non-Resident Shareholders who are tax residents of Notified Jurisdictional Area as defined u/s 94A(1) of the Act	30%	NA
5	Sovereign Wealth funds and Pension funds notified by Central Government	NIL	<ul style="list-style-type: none"> • Copy of the notification substantiating the applicability of section 10(23FE) of the Act issued by Government of India by notification in the Official Gazette.

	u/s 10(23FE) of the Act		<ul style="list-style-type: none"> Self-Declaration (Please download the Link given as Annexure 8 and 9, at the end of this communication) that the conditions specified in section 10(23FE) have been complied with.
6	Subsidiary of Abu Dhabi Investment Authority (ADIA) as prescribed under section 10(23FE) of the Act	NIL	Self-Declaration (Please download the Link given as Annexure 10, at the end of this communication) substantiating the fulfillment of conditions prescribed under section 10(23FE) of the Act
7	Availability of lower/nil tax deduction certificate issued by Income Tax Department u/s 197 of the Act	Rate specified in Lower tax withholding certificate obtained from Income Tax Department	<ul style="list-style-type: none"> Self-attested Copy of PAN card Copy of lower tax withholding certificate obtained from Income Tax Department

SUBMISSION OF TAX RELATED DOCUMENTS:

The above referred documents duly completed and signed are required to be sent to the Company through email at tdsdiv225@Injbhilwara.com by quoting your Name, Folio number / Demat Account No. (DP and Client ID both), Number of shares and PAN details **on or before 1st July, 2024** in order to enable the Company to determine and deduct appropriate TDS / withholding tax.

Hence, to enable us to deduct TDS on Dividend at the rate lower than the prescribed rate, the above documents should be submitted **on or before 1st July, 2024**. No communication on the tax determination/ deduction shall be entertained in respect of the dividend declared after the above time limit.

The Resident Non-Individual Shareholders i.e. Insurance companies, Mutual Funds and AIF established in India and Non-Resident Non-Individual Shareholders i.e. Foreign Institutional Investors and Foreign Portfolio Investors may submit the relevant forms / declarations / documents through their respective custodian who is registered on NSDL platform, **on or before 1st July, 2024**.

All communications/queries in this respect shall be sent to tdsdiv225@Injbhilwara.com only. Documents sent to any other email ID may lead to non-submission of documents and attract TDS as per the provisions of the Act. Documents received by Post at the Corporate Office or from registered email ID will only be accepted.

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 37BA of Income Tax Rules 1962. **(Please download the Link given as Annexure 11, at the end of this communication)**

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, 1961 and claim an appropriate refund, if eligible. No claim shall lie against the Company for such taxes deducted.

UPDATION OF BANK ACCOUNT DETAILS:

In case your Bank details are not updated with records of Depository Participant, if shares are held in demat form, or with the Registrar and Share Transfer Agent of the Company, if shares are held in Physical form, you are requested to kindly get the same updated, to enable the Company to make timely credit of dividend in your bank accounts. We seek your cooperation in this regard.

PAYMENT OF DIVIDEND IN ELECTRONIC MODE:

Shareholders holding shares in physical folios are requested to note that SEBI vide its Master Circular no. SEBI/HO/MIRSD/ POD-1/P/CIR/2024/37 dated May 7, 2024 issued to the Registrar & Transfer Agents and SEBI Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2023/181 dated November 17, 2023, as amended, has mandated that effective April 1, 2024, dividend to the security holders holding shares in physical mode shall be paid only through electronic mode. Such payment to the eligible shareholders holding physical shares shall be made only after they have furnished their PAN, Choice of Nomination, Contact Details (Postal Address with PIN and Mobile Number) Bank Account Details and Specimen Signature for their corresponding physical folios to the Company or the RTA.

Further, your kind attention is drawn to the SEBI Circulars issued time to time on the norms/procedural requirements for processing service requests of investors specified by the SEBI to mandatorily update the PAN, KYC (including contact details viz. Email address / Mobile no.), Nomination details, Bank Account details and Specimen Signature of all Shareholders holding shares in physical form and compulsory linking of PAN with Aadhar number by all Shareholders. Therefore, Shareholders who have yet not updated the above said information / KYC details are requested to download the necessary Forms from the website of the Company i.e. www.heg ltd.com under head **Investors > Investor Service Request > Updation of PAN, KYC, Nomination and Bank Account Details etc.** and submit the same duly completed in all respect to our RTA at the following address:

MCS Share Transfer Agent Limited

(Unit: HEG Limited),

F-65, First Floor, Okhla Industrial Area, Phase-I, New Delhi-110020.

Phone no. 011-41406149 –52 ; Email ID: helpdeskdelhi@mcsregistrars.com

Additional Notes:

1. Shareholders will be able to download the copy of TDS certificates from the website of the Company (www.heg ltd.com) Home page, in due course by furnishing the PAN number and Shareholders can also check the credit of TDS in Form 26AS by login in to e-filing portal of Income Tax.
2. The aforesaid documents such as Form 15G/ 15H, documents under section 196, 197A, FPI Registration Certificate, Tax Residency Certificate, Lower Tax certificate etc. can be send on the e-mail id of the Company at tdsfdiv225@lnjphilwara.com **on or before 1st July, 2024** 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 **1st July, 2024** shall not be considered.

3. 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.
4. **TDS to be deducted at higher rate in case of non-filers of Return of Income:**
In case of resident shareholders, if the income-tax return for the immediately preceding the financial year is not filed within the time limit prescribed under Section 139(1) of the Income Tax Act, 1961 and the aggregate of the amount of tax deducted at source and tax collected at source in case of such shareholder is INR 50,000 or more in the said previous year, then the Company would withhold tax at higher of the following rates:
 - a. Twice the rate specified in the relevant provisions of the Income Tax Act, 1961
 - b. Twice the rate or rates in force
 - c. 5%

As directed by the Central Board of Direct Taxes vide Circular No. 11 of 2021 dated June 21, 2021, the Company will be using functionality of the Income-tax department for determination of specified person for the purpose of Section 206AB of the Act.

5. **TDS to be deducted at higher rate in case of non-linkage of PAN with Aadhaar:**
As per Section 139AA of the Act, every person who has been allotted a PAN and who is eligible to obtain Aadhaar, shall be required to link the PAN with Aadhaar. In case of failure to comply with this, the PAN allotted shall be deemed to be invalid/inoperative and tax shall be deducted at the rate of 20% as per the provisions of Section 206AA of the Act. The Company will be using the functionality of the Income-tax department for the above purpose. Provisions will be effective from July 1, 2023. Shareholders may visit <https://www.incometax.gov.in/iec/foportal/help/e-filing-link-aadhaar-faq> for FAQ issued by Government on PAN Aadhaar linking.
6. 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.
7. 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.
8. In terms of Rule 37BA of Income Tax Rules 1962 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 11, at the end of this communication).***
9. In case of Shareholder being tax resident of Singapore, please furnish the letter issued by the competent authority or any other evidence demonstrating the non-applicability of Article 24 - Limitation of Relief under India-Singapore DTAA.

Link for Annexures as mentioned above:-

1. Annexure 1 : <https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-1.pdf>
2. Annexure 2 : https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-2-FORM_15G.pdf
3. Annexure 3 : https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-3-Form_15H.pdf
4. Annexure 4 : <https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-4.pdf>
5. Annexure 5 : <https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-5.pdf>
6. Annexure 6 : <https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-6.pdf>
7. Annexure 7 : <https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-7.pdf>
8. Annexure 8 : <https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-8.pdf>
9. Annexure 9 : <https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-9.pdf>
10. Annexure 10 : <https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-10.pdf>
11. Annexure 11 : <https://hegltd.com/wp-content/uploads/2024/06/ANNEXURE-11.pdf>

Thanking You,

Yours faithfully,
For HEG Limited

Sd/-
(Vivek Chaudhary)
Company Secretary

Disclaimer: The above information does not constitute tax or legal advice. In view of the individual nature of the tax implications, each investor is advised to consult his or her own tax advisors with respect to the specific tax implications.