Disclaimer: This communication is intended solely for providing information and should not be construed as tax advice from the Company. Shareholders are advised to consult their tax advisors for guidance on their specific tax matters.

Pursuant to the requirement of the Income-Tax Act, 2025, the Company will be required to withhold taxes/ deduct tax at source (TDS) before making any distribution or payment of dividend at the prescribed rates on the dividend paid to its members.

1. **Resident Shareholders**
    a. **Threshold Exemption:** In terms of Section 393(4) [Table: Sl. No. 10] of the Act, no TDS shall be deducted where the total dividend payable to an individual shareholder during a financial year does not exceed **₹10,000**.
    b. **Standard Deduction:** Where dividend exceeds the above threshold, TDS will be deducted at **10%**, provided the shareholder has furnished a valid **Permanent Account Number (PAN)**.
    c. **Higher Rate:** In the absence of a valid PAN, or where the PAN details are invalid, or where PAN is not linked with AADHAR in case of an individual, tax will be deducted at **20%** in accordance with Section 397 of the Act.
    d. **Forms 121:** Eligible shareholders may submit a duly completed **Form 121** to claim exemption from TDS, subject to fulfilment of prescribed conditions.
    e. **Multiple Accounts:** In cases where a shareholder holds shares in multiple accounts under different categories but linked to the same PAN, the Company shall apply the highest applicable tax rate across all such holdings.

Exemption categories: Certain entities are exempt from withholding tax; such entities are required to submit valid documentary evidence. Such entities are:

a. Entities to whom Section 393(1) [Table: Sl. No. 7] of the Income Tax Act, 2025 does not apply as per Section 393(4) [Table: Sl. No. 10] such as LIC, GIC etc.
b. Entities covered u/s 393(5) of the Income Tax Act, 2025 such as Government, RBI, Corporations established by Central Act & mutual funds.
c. Category I and II Alternate Investment Fund
d. Recognised Provident Funds, Approved Superannuation Funds, Approved Gratuity Fund
e. National Pension Scheme as per Section 393(9)

2. **Non-Resident Shareholders**
    a. **General Rate:** TDS will be deducted at 20% (plus applicable surcharge and cess) on the gross dividend amount.
    b. **DTAA Benefits:** Non-resident shareholders may opt for the beneficial tax rates available under an applicable **Double Tax Avoidance Agreement (DTAA)/ Tax Treaty**, subject to submission of the following documents prior to the record date:
        i. Copy of PAN (if allotted by Indian Income Tax authorities);
        ii. Valid **Tax Residency Certificate (TRC)** issued by the Government of the shareholder's country of residence;
        iii. Duly filled and signed **Form 41**, if not all details are captured in the TRC;
        iv. Self-declaration confirming eligibility to claim DTAA benefits, absence of a Permanent Establishment (PE) / fixed base in India, and beneficial ownership of the dividend income.

Please note that the Company will apply DTAA rates only after due verification of the above documents. Incomplete or invalid documentation will result in deduction of tax at the default rate.

3. Summary of Applicable TDS Rates

Shareholder Category	TDS Rate	Conditions
Resident individual (dividend ≤ ₹10,000 in FY)	Nil	No TDS if within threshold
Resident individual (dividend > ₹10,000, valid PAN)	10%	PAN required
Resident individual (PAN not furnished/invalid)	20%	Section 397 applies
Resident entities eligible for exemption (MFs, Insurance Cos., AIFs, NPS Trust, etc.)	Nil	Submission of valid declaration & supporting documents
Non-Resident shareholder (general)	20% + surcharge & cess, if applicable	
Non-Resident shareholder (with DTAA benefit)	As per DTAA	TRC, Form 41, self-declaration

4. Mode of Document Submission:

All shareholders are requested to forward the duly signed documents, as specified above, to the Company's at investors@gemenviro.com and to the Company's Registrar and Transfer Agent (RTA) at the following email address: compliance@skylinerta.com

No communication on the tax determination/ deduction shall be entered after record date.

In the event that dividend tax is withheld at a higher rate due to non-submission of the required documents/details, shareholders may claim a refund of the excess tax while filing their income-tax return, in consultation with their tax advisor. The Company shall not be responsible for any such deduction. The credit of TDS so deducted will be reflected in Form 168, which can be accessed and downloaded from the Income-tax Department's e-filing portal at https://incometaxindiaefiling.gov.in .