



Our Ref: NCD/SE/March/2023

March 13, 2023

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor, Plot No C/1,
G Block, Bandra-Kurla Complex,
Bandra (E), Mumbai – 400051
Symbol – GESHIP

Dear Sirs,

Sub: Communication with regards to Tax Deduction at Source (TDS) on payment of interest on Listed Debentures.

Please find enclosed communication being sent to the debenture holders in connection with deduction of Income-tax at source on Interest payable on listed non-convertible debentures and submission of documents for claiming applicable tax exemption.

This is for your information and records.

Thanking you,

Yours faithfully

For: **The Great Eastern Shipping Company Limited**

Jayesh M Trivedi
President (Sec & Legal)
& Company Secretary
Email Id: jayesh_trivedi@greatship.com

Encl: As above.



March 13, 2023

The Debenture holders,
The Great Eastern Shipping Company Limited

Dear Sir/Madam,

Sub: Communication regarding TDS on interest on Listed Debentures

As you may be aware, the yearly interest payment on 8.85% Secured Non Convertible Debentures (ISIN INE017A07559) is due on April 12, 2023 and will be payable (net of TDS wherever applicable) to those Debenture holders whose name appears in the list of NCD holders as on record date i.e. March 28, 2023.

Finance Bill, 2023 has proposed to amend Section 193 of the Income-Tax Act – TDS on interest on securities payable to resident debenture holders, to withdraw the exemption from TDS on interest on listed securities with effect from 1st April, 2023. Therefore, with effect from April 1, 2023, we will be required to deduct TDS on the interest payable on Debentures issued by us which are listed on the Stock Exchanges.

Accordingly, from April 1, 2023 interest payable to debenture holders on debentures issued by us (the Company) will be paid after deducting TDS in the following manner:

Resident Debenture holders

- 1) Where the debenture holder holds a valid Permanent Account Number (PAN) and the PAN is linked with Aadhaar (in case of individuals):
 - a) Tax shall be deducted at source @ 10% on the amount of interest payable.
 - b) No tax shall be deducted, if:
 - i) the interest is paid to an individual or HUF debenture holder and such interest in aggregate during the financial year does not exceed Rs.5,000; or
 - ii) the individual debenture holder, who is less than 60 years of age, provides a duly filled and signed Form 15G, which is acceptable to the company. Form 15G would not be valid if the interest payable to the debenture holder in a financial year exceeds the maximum amount which is not chargeable to tax.



- iii) the individual debenture holder, who is of 60 years or more, provides a duly filled and signed Form 15H which is acceptable to the company.

The formats of Form 15G and 15H are available on the websites of the Company:
www.greatship.com;

- iv) the interest is paid to Life Insurance Corporation, General Insurance Corporation (GIC subsidiaries or any other Insurer on the debentures owned by it or in which it has a full beneficial interest. In such cases, the debenture holders are required to intimate to the Company that TDS is not deductible in their case along with appropriate documentary evidence, such as evidence of being registered as an Insurer with Insurance Regulatory and Development Authority of India (IRDAI).
- v) the income of the debenture holder is unconditionally exempt u/s 10 of the Income-Tax Act, 1961 and the debenture holder is not required to file a Return of Income under Section 139 of the Income-Tax (please see CBDT Circular No.18/2017), provided that the debenture holder satisfies the Company in this regard by furnishing a declaration along with documentary evidences. Example: Recognised Provident Funds, Approved Gratuity Funds, Approved Superannuation Funds, Local Authority, etc.
- 2) Where the PAN is either not available or is invalid or the debenture holder has not filed his/her/its Income Tax Return for the financial year immediately preceding the current financial year within the due date prescribed under the Act and the aggregate of TDS and Tax Collected at Source (TCS) in his/her/their case is Rs.50,000 or more, in such preceding financial year (defined as Specified Person in Section 206AB of the Income-tax Act), tax shall be deducted at the higher rate of 20%. For the purpose of TDS, the Company will verify the status of the debenture holder whether he/she/it is a Specified Person or not from the Government enabled online facility and deduct tax at source accordingly. The Company will also verify whether the PAN of an individual debenture holder is linked to his / her Aadhar number and if it is not linked, the PAN shall be treated as invalid.
- 3) No tax will be deducted at source from interest payable to Mutual Funds. Mutual Funds are required to furnish the following documents on or before March 27, 2023 to the Company's Registrar and Share Transfer Agents ('RTA') viz., KFin Technologies Limited:
- Certified copy of SEBI registration / CBDT notification and a declaration that their income is exempt under section 10(23D) of the Income-tax Act and therefore no TDS is required in terms of section 196(iv) of the Act.



Non-resident Debenture holders

- 4) Tax will be deducted at source in accordance with the provisions of the Act at applicable rates in force.
- 5) Tax shall be deducted at source @ 20% (plus applicable surcharge and cess) on the amount of interest payable.
- 6) As per the provisions of the Act, the non-resident debenture holders can opt to be governed by the provisions of the Double Tax Avoidance Treaty (DTAA/Tax Treaty) between India and the country of tax residence of the debenture holder, if such DTAA/Tax Treaty provisions are more beneficial to them. In order to avail the DTAA/Tax Treaty benefits, the non-resident debenture holder is required to furnish the following documents on or before March 27, 2023 to the RTA viz., KFin Technologies Limited.
 - a. Self-attested copy of Permanent Account Number (PAN), if allotted by the Indian Income Tax Authorities; or
 - b. Self-attested Tax Residency Certificates (TRC) issued by the tax authorities of the country of which Debenture holder is a tax resident, evidencing and certifying the Debenture holder's tax residency status during the Calendar Years 2022 and 2023.
 - c. Completed and duly signed Self-Declaration in Form 10F, draft format available on the website of the Company: www.greatship.com.
 - d. Self-declaration in the prescribed format available on the website of the Company: www.greatship.com.
 - e. No Permanent Establishment (PE) Declaration in the prescribed format available on the website of the Company: www.greatship.com.

Debenture holders having/holding PAN are required to file form 10F electronically on the Income-tax departments' website www.incometax.gov.in and upload TRC and self declaration on the website. Debenture holders who do not hold a PAN are required to file TRC, Form 10F and the self declaration with the company / RTA physically.



- 7) The Company is under no obligation to apply the beneficial DTAA tax rate at the time of tax deduction/withholding on dividend amounts. Application of beneficial DTAA tax rate depends upon the completeness and satisfactory review by the Company of the documents submitted by the concerned Non-Resident Debenture holder.
- 8) In terms of Rule 37BA of the Income Tax Rules 1962, if the interest income on which tax has been deducted at source is assessable in the hands of a person other than the deductee, then such deductee should file a declaration with the Company and its RTA in the manner prescribed in the said Rule on or before March 27, 2023. Such declaration should contain the name, address, PAN of the person to whom such credit is to be granted, and the reasons for granting credit to such person. No request in this regard would be accepted by Company/RTA after the said date.

Kindly note that in order to enable the Company to determine and deduct appropriate TDS/withholding tax, the scanned copy of the duly signed documents as mentioned above are required to be emailed to the Company at ncdtax@greatship.com and to its RTA, viz., KFin Technologies Limited at einward.ris@kfintech.com on or before March 27, 2023. No communication on the tax determination/ deduction shall be entertained thereafter.

The original documents may be sent in due course to the Company at its registered office or to its RTA at the following address :

KFin Technologies Ltd.
Unit: The Great Eastern Shipping Co. Ltd.
Karvy Selenium, Tower B, Plot 31-32, Gachibowli,
Financial District, Nanakramguda, Hyderabad - 500 032

For withholding of taxes, the residential status of the debenture holders will be considered as per the data available with the the Depository Participants ('DPs'). In case there is change in their status, then the debenture holders are requested to update their current status with the the DPs **on or before March 27, 2023**.

You may kindly note that in case the tax on the interest is deducted at a higher rate in absence of receipt of the aforementioned details/documents from you, there would still be an option available with you to file the return of income and claim an appropriate refund, if eligible.

Incomplete and/or unsigned forms, declarations and documents will not be considered by the Company for granting any exemption.

**THE GREAT EASTERN
SHIPPING COMPANY LIMITED**
CIN: L35110MH1948PLC006472



OCEAN HOUSE, 134/A, Dr. Annie Besant Road, Worli, Mumbai - 400 018, INDIA. Tel.: +91(22) 6661 3000 / 2492 2100 Fax : +91(22) 2492 5900

Kindly note that no claim shall lie against the Company for tax deducted at source/withheld at source.

The Company shall arrange to email a soft copy of the TDS certificate at the debenture holder's registered email ID post filing of the relevant e-TDS Return. Thereafter, Debenture holders will be able to see the credit of TDS in Form 26AS, which can be downloaded from their e-filing account at <https://incometaxindiaefiling.gov.in>. or <https://eportal.incometax.gov.in/iec/fooservices/#/login>

In case you require any other information/clarification with regard to the above, kindly write to us at ncdtax@greatship.com or our RTA at einward.ris@kfintech.com.

Disclaimer: This Communication shall not be treated as an advice from the Company. Debenture holders should obtain the tax advice related to their tax matters from a tax professional.

Thanking you,

Yours faithfully,

For The Great Eastern Shipping Company Limited

Jayesh Trivedi

President (Secl. & Legal) and Company Secretary.