Birla Corporation Limited
Corporate Office:
1, Shakespeare Sarani,
A.C. Market (2nd Floor), Kolkata 700 071
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10th July, 2026

BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400 001
Scrip Code: 954925/954744

Dear Sir(s),

Sub: **Communication to Debenture holders on deduction of tax at source on payment of interest**

Pursuant to the provisions of the Income Tax Act, 2025, interest paid on Debentures issued by the Company shall be taxable in the hands of the Debenture holders.

In this regard, please find enclosed herewith a copy of the email communication which has been sent to the Debenture holders of the Company whose e-mail addresses are registered with the Company/ its Registrar to an Issue and Share Transfer Agent viz. KFin Technologies Limited, regarding deduction of tax at source on payment of interest.

This communication along with the Annexures are also available on the website of the Company at www.birlacorporation.com.

The communication was sent to the debenture holders today at around 5.45 p.m.

This is for your information and record

Thanking you,

Yours faithfully,
For **BIRLA CORPORATION LIMITED**

MANOJ MEHTA
Digitally signed by MANOJ MEHTA
Date: 2026.07.10 18:15:23 +05'30'

(MANOJ KUMAR MEHTA)
Company Secretary & Legal Head

Encl: As above

Birla Corporation Limited

CIN: L01132WB1919PLC003334
Registered Office: 3rd Floor, 9/1 RN Mukherjee Road, Kolkata- 700001
Tel: (033) 6616 6730/ 6603 3300; **Fax:** +91 33 2248 7988/2872
Website: www.birlacorporation.com; **Email:** investorsgrievance@birlacorp.com,

Date: 10th July, 2026

Dear Debenture Holder(s),

We hope this communication finds you and your family safe and in good health.

This refers to the investment made by you in Rated, Listed, Secured, Redeemable Non-Convertible Debentures (NCD) issued by the Company. In this regard, please note that interest on the same will be paid to those NCD holders whose names appears in the list of NCD holders as on the record date.

As per the Income-Tax Act, 2025 ('the IT Act'), Tax Deduction at Source (TDS) is applicable on interest payments on listed debentures. Accordingly, the Company is required to deduct tax at the prescribed rates under the IT Act on the interest payments on the listed debentures issued by the Company to NCD holders whose name appears in the list of NCD holders as on the respective record dates. The tax so deducted will be paid to the credit of the Central Government.

This communication summarizes the applicable TDS provisions as per the IT Act for various categories of NCD holders along with required documents provided in Table 1 and 2 below:

Table 1: Resident Debenture holders

Sl. No.	Category of NCD holder	Tax Rate	Certified /Self certified copy of documents to be taken on record date
	A		C
1	Resident debenture holders having valid PAN	10%	(a) No deduction of taxes in the following cases - i. If interest income to a resident debenture holder during Tax Year (TY) 2026-27 does not exceed ₹10,000/; or ii. If debenture holder furnishes Form No. 121 (erstwhile Form 15G/ Form 15H), fulfilling all the required eligibility conditions. (Click here to download the Form No. 121). Kindly note that w.e.f. 01.04.2026, the IT Act and the Income-tax Rules, 2026 ('IT Rules') has prescribed a single Form no. 121, in place of the erstwhile Forms 15G and 15H. Accordingly, eligible individual debenture holders are requested to submit Form no. 121 for the TY 2026–27. Please note that any declaration submitted in the erstwhile Forms 15G/15H will not be accepted for the TY 2026–27 as per the provisions of the IT Act.
2	Resident debenture holders not having PAN/ having discrepancy in PAN/ PAN not linked with Aadhaar	20%	In case PAN is not furnished / found to be invalid/ not linked with Aadhaar*, the rate of deduction of tax shall be 20%.

3	Life Insurance Corporation of India, General Insurance Corporation of India, Any 4 companies formed by virtue of schemes framed u/s. 16(1) of General Insurance business (Nationalisation) Act 1972. Any company in which GIC and aforesaid companies have full beneficial interest.	NIL	Self-attested copy of documentary evidence as specified under proviso to Section 393 of the IT Act along with self-attested copy of registration certificate with IRDAI and PAN card.
4	Government, Reserve Bank of India (RBI) or Corporations established by or under a Central Act which is, under any law for the time being in force, exempt from income-tax on its income	NIL	Documentary evidence that the Person/ Corporation is covered under section 393(5) of the IT Act along with self-attested copy of PAN card.
5	Mutual Funds	NIL	Self-attested copy of SEBI registration certificate and PAN card along with self-declaration that the mutual funds are notified mutual fund under Schedule VII (Table: S. No. 20 or 21) of the IT Act.
6	Debenture holders whose income are unconditionally exempt under section 11 of the IT Act and are not required to file a return of income under section 263 of the IT Act in terms of CBDT Circular No. 18/2017	NIL	Copy of Registration and/or Exemption certificate issued by relevant statutory authorities and Income-Tax authorities respectively, and declaration that income is exempt under section 11 of the IT Act along with the copy of PAN card.
7	Category - I & II Alternative Investment Funds (AIF) registered with the Securities and Exchange Board of India (SEBI)	NIL	A declaration that its income is exempt under section 11 read with Schedule V (Table: Sl. No. 1) of the IT Act and they are registered with SEBI as Category I or Category II AIF along with self-attested copy of registration documents and PAN card should be provided.
8	Debenture holders submitting order u/s 395 of the IT Act	Rate provided in the Order	Lower/NIL withholding tax certificate obtained from Income Tax authorities along with self-attested copy of PAN card. Note: The certificate should be valid for the TY 2026-27 and should cover the Interest income from the Company.

*As per section 262 of the IT Act, every person who has been allotted a PAN and who is eligible to obtain Aadhaar, is required to link the PAN with Aadhaar, failing which the PAN shall be deemed to be inoperative. Hence, if any debenture holder's PAN has become inoperative due to non-linking with Aadhaar, tax at source will be deducted at higher rates as per the provisions of section 397(2) of the IT Act. The Company will use the functionality of the Income-tax Department for checking the validity of PANs/ inoperative PANs.

Table 2: For Non-Resident Debenture holders:

Sl.no.	Particulars	TDS rates	Documents to be taken on record date
	A	B	C
1.	Any non-resident debenture holders/ Foreign Institutional Investors (FII)/ Foreign Portfolio Investors (FPI) under section 393(2) [Table Sl. No. 15 & 17] of the IT Act except if specifically falling under any of the below categories.	20% (plus applicable surcharge and cess) or Tax Treaty rate whichever is lower	Non-Resident debenture holders / FII / FPI may opt for tax rate under Double Taxation Avoidance Agreement ("Tax Treaty"). The Tax Treaty rate shall be applied for tax deduction at source on submission of following documents to the Company: i. Self-attested Copy of the PAN Card, if any, allotted by the Indian authorities. ii. Self-attested copy of Tax Residency Certificate (TRC) obtained from the tax authorities of the country of residence of the debenture holder for the year in which interest is paid. iii. Form 41 (erstwhile form 10F) filed on income tax portal at https://eportal.incometax.gov.in/ iv. Self-declaration from Non-resident for the TY April 2026 to March 2027, primarily covering the following (Click here to download the format): ➢ Non-resident is eligible to claim the benefit of respective tax treaty; ➢ Non-resident will continue to remain a tax resident of the country during TY 2026-27; ➢ Non-resident has no reason to believe that claim for the benefits of the Tax Treaty is impaired in any manner; ➢ Non-resident receiving the interest income is the beneficial owner of such income; ➢ Interest income is not attributable/effectively connected to any Permanent Establishment (PE) or Fixed Base in India or any business connection in terms of section 9(1) of the IT Act; ➢ Non-resident complies with any other condition prescribed in the relevant Tax Treaty and provisions under the Multilateral Instrument ('MLI'); ➢ Tax Identification Number and Complete address in the country of residence. v. In case of Foreign Institutional Investors and Foreign Portfolio Investors, self-attested copy of SEBI registration certificate. vi. In case of debenture holder being tax resident of Singapore, letter issued by the competent authority or any other evidence demonstrating the non-applicability of Article 24 - Limitation of Relief under India-Singapore Double Taxation Avoidance Agreement. TDS shall be deducted at 20% (plus applicable surcharge and cess) if any of the above-mentioned documents are not provided / found to be not valid.

			The Company is not obligated to automatically apply the Tax Treaty rates at the time of tax deduction/ withholding on interest amounts. Application of the Tax Treaty rate shall depend upon the completeness and satisfactory review by the Company, of the documents submitted by the non- resident debenture holders. Further, in terms of CBDT Circular 3/2022, benefit of 'Most Favoured Nation' clause, if available, under any respective Tax Treaty, shall not be considered for the purpose of determining the withholding amount.
2.	Foreign Portfolio Investors (FPIs) – Category I under section 393(2) [Table: Sl. No. 16] read with Schedule VI [(Note 1(g)(ii)] of the IT Act	10% (plus applicable surcharge and cess)	Self-attested copy of PAN card and Self-declaration along with adequate documentary evidence (e.g. registration certificate) substantiating the nature of the entity.
3.	Debenture holder submitting order under section 395 of the IT Act	Rate provided in the Order	Lower/Nil withholding tax certificate obtained from Income Tax authorities, along with self-attested copy of PAN card. Note: The certificate should be valid for the TY 2026-27 and should cover the Interest income from the Company.

Note: It is recommended that debenture holders should independently satisfy their eligibility to claim DTAA benefit including meeting of all conditions laid down by DTAA.

Debenture holders who are exempted from TDS provisions through any circular or notification may provide documentary evidence in relation to the same, to enable the Company in applying the appropriate TDS on interest payment to such debenture holder.

Kindly note that the aforementioned documents are required to be forwarded to the RTA at **einward.ris@kfintech.com** or alternatively, you may mail to the Company at **dtds@birlacorp.com** on or before **10th August, 2026 or 7 days from respective record dates, whichever is later,** in order to enable the Company to determine and deduct appropriate TDS/ withholding tax rate.

Documents sent to any other email ids may tantamount to non-submission of documents and attract TDS as per the Provisions of the IT Act. Additionally, no communication on the tax determination/deduction shall be considered post cut-off date. The Company reserves the right to reject the documents in case of any discrepancy or if the documents are found to be incomplete.

Further, the resident non-individual debenture holders such as Insurance companies, Mutual Funds, Alternative Investment Fund (AIF) and other domestic financial institutions established in India and non-resident non-individual debenture holders such as Foreign Portfolio Investors can also submit the relevant forms, declarations and documents as aforesaid through their respective custodians who are registered with NSDL for tax services, on or before the aforesaid timelines.

It may be further noted that in case the tax on said 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, but no claim shall lie against the Company for such taxes deducted. The tax credit can also be viewed by logging in with your credentials at TRACES https://www.tdscpc.gov.in/app/login.xhtml or the e-filing website of the Income Tax department of India https://eportal.incometax.gov.in/iec/foservices/#/login.

In terms of Rule 203 of the Income Tax Rules, 2026, if interest income on which tax has been deducted at source is assessable in the hands of a person other than the deductee, such deductee should send a duly signed declaration with details of actual beneficial owner in excel sheet as per Annexure-A (Format can be downloaded from the link given at the end of the communication) to the RTA at **einward.ris@kfintech.com** or the Company at **dtds@birlacorp.com** in the manner prescribed in the said Rules. Declaration should be filed within 7 days of record dates for the purpose of payment of interest. **Declaration filed after the said period would not be entertained by Company**.

Debenture holders holding debentures in Demat mode are requested to update their PAN, Bank Account details, Mobile Number, E-mail ID, Address, Residential status, category, Nomination and other details with their relevant depositories through their depository participants.

In the event of any income tax demand (including interest, penalty, etc.) arising from any misrepresentation, inaccuracy or omission of information provided by the debenture holders, the debenture holders shall be responsible to indemnify the Company and also, provide the Company with all information / documents and co-operation required in any tax proceedings.

Debenture holders may contact the RTA at their email id: **einward.ris@kfintech.com** or with the Company at email id: **dtds@birlacorp.com** for any clarification/information in the matter.

We seek your cooperation in this regard.

Yours Sincerely,
For **Birla Corporation Limited**
Sd/-
Manoj Kumar Mehta
Company Secretary & Legal Head

Click here to download – Declaration under Rule 203
Click here to download – Annexure-A to Rule 203

Note: Please mention DP ID/ Client ID in all future communication.

***Disclaimer**: 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 interest payment. Debenture holders should consult their tax advisors for requisite action to be taken by them.*

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