

Date: August 05, 2024

To,
Listing Department,
National Stock Exchange of India Limited
Exchange Plaza, C-1 Block G,
Bandra Kurla Complex, Bandra (E), Mumbai.

Scrip Symbol: FOCUS
Series: EQ

Sub: Communication to shareholders in respect of deduction of tax at source on dividend pay-out.

Dear Sir/ Ma'am,

Pursuant to the Finance Act, 2020, with effect from April 01, 2020, Dividend Distribution Tax is abolished and dividend income is taxable in the hands of the shareholders.

In this regard, please find enclosed herewith an email communication which has been sent on August 05, 2024 to all the shareholders having their email id's registered with the Company/Depositories explaining the process on withholding tax from dividends paid to the shareholders at prescribed rates along with the necessary annexures.

This communication is also available on the website of the Company
<https://www.focuslightingandfixtures.com/investors/announcements-2024-25/>

You are requested to take the same on record.

FOR FOCUS LIGHTING AND FIXTURES LIMITED

AMIT VINOD SHETH
MANAGING DIRECTOR
DIN: 01468052

FOCUS
LIGHTING & FIXTURES LTD

PLUS
LIGHT TECH

TRIX.

L&B Lumens
& Beyond

Focus Lighting And Fixtures Limited

Corporate Identity No. (CIN): L31500MH2005PLC155278

Regd. Office: 1007-1010, Corporate Avenue Wing A, Sonawala Road, Near Udyog Bhavan,
Goregaon (East), Mumbai- 400063.

Website: www.focuslightingandfixtures.com ; **Tel:** + 91-22-26865671-6

Date: August 05, 2024

Folio No. / DP Id & Client Id (Login ID)	
Name of Investor:	

Dear Members,

SUB: COMMUNICATION IN RESPECT OF DEDUCTION OF TAX AT SOURCE ON FINAL DIVIDEND FOR FY 2023-24 AND APPLICABLE TAX DEDUCTION (TDS)

We are pleased to inform you that the Board of Directors of the Company in their meeting held on August 02, 2024 have recommended a Final Dividend of Rs. 0.50/- per Equity Share of face value of Rs. 2/- each for the Financial Year 2023-24, which shall be payable to the shareholders, if approved, at the ensuing Annual General Meeting (AGM) of the Company scheduled to be held on Wednesday, the 11th day of September 2024 at 02:00 p.m. at the 11C, Laxmi Industrial Estate, New Link Road, Opp. Fun Republic, Cinema, Andheri West, Mumbai – 400058.

The dividend will be paid to the equity shareholders holding equity shares of the Company, either in electronic or physical form as on the Record Date dated August 30, 2024 - fixed for determining eligibility of shareholders to receive the dividend. The same shall be paid within a period of 30 days from the date of AGM, electronically, through various online modes to those members who have updated their bank account details or through any other permissible mode.

SEBI vide its Circular No. SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2021/655 dated November 3, 2021 (subsequently amended by Circular Nos. SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2021/687 dated December 14, 2021, SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2023/37 March 16, 2023, SEBI/HO/MIRSD/POD-1/P/CIR/2023/181 November 17, 2023 and SEBI/HO/MIRSD/POD-1/P/CIR/2024/81 dated 10th June, 2024) has mandated that with effect from April 1, 2024, dividend to security holders (holding securities in physical form), shall be paid only through electronic mode. Such payment shall be made only after furnishing the PAN, choice of nomination, contact details including mobile number, bank account details and specimen signature. If the KYC details is not updated by the shareholder, then the dividend will be withheld by the Company. Members are requested to update their KYC details with the Company's Registrar and Transfer Agents, Bigshare Services Private Limited., Office No S6-2, 6th floor Pinnacle Business Park, Next to Ahura Centre, Mahakali Caves Road, Andheri (East), Mumbai – 400093 (Email ID: tds@bigshareonline.com).

In terms of the provisions of the Income-tax Act, 1961, ("Act"), as amended by the Finance Act, 2020, mandates that dividend paid or distributed by a Company on or after 1st April 2020 is taxable in the hands of shareholders. The Company shall therefore be required to deduct tax at source at the time of payment of dividend, at rates based on the category of shareholders and subject to fulfilment of conditions as provided herein below:

The Shareholders are requested to update their PAN, Bank account detail, Email ID and Address with the Company/Bigshare Services Private Limited (Registrar and Transfer Agent) (in case of shares held in physical mode) and with the Depositories/ Depository Participants (in case of shares held in Demat Mode)

This communication provides the applicable Tax Deduction at Source (TDS) provisions under the IT Act for Resident and Non-Resident shareholder categories. The Shareholders are requested to refer to the IT Act for the prescribed rates applicable to them.

I. For Resident Shareholders

Particulars & Category of shareholders	Rate of Tax Deduction	Exemption documents to be given
Individuals		
If total Dividend income to a resident individual shareholder during Financial Year 2023-24 > Rs. 5,000	10% in case where PAN is provided/available 20%, in other cases where PAN is not provided / not available/ inoperative or in case the shareholder falls in the category of “specified persons”	Update the PAN if not already done with the depositories (in case of shares held in demat mode) and with the Company's Registrar and Transfer Agent – Bigshare Services Private Limited (BSPL) (in case of shares held in physical mode). It may be noted that 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 to the same, the PAN allotted shall be deemed to be invalid/ inoperative and he shall be liable to all consequences under the Act and tax shall be deducted at higher rates as prescribed under the Act. The Company shall be relying on the information verified by the utility available on the Income Tax website for such purpose.
Shareholders providing duly signed Form 15G (applicable to <u>only resident individual shareholders</u> below the age of sixty years) /15H (applicable to <u>only resident individual shareholders</u> aged 60 years or more) provided that all the prescribed eligibility conditions are met.	NIL	Form 15G/ 15H duly signed, along with self-attested copy of PAN card. The forms are also available on the website of BSPL. Please note that all fields are mandatory to be filled up and Company may at its sole discretion reject the form if it does not fulfil the requirements of law.
If total Dividend income to a resident individual shareholder in Financial Year 2023-24 < Rs. 5,000	NIL	-
Other than Individuals		
Indian Commercial Banks/Indian Financial Institutions	10%	-
Insurance Companies: LIC & Other Insurance	NIL	Self-declaration that it qualifies as ‘Insurer’ as per section 2(7A) of the Insurance Act, 1938 and has a

Particulars & Category of shareholders	Rate of Tax Deduction	Exemption documents to be given
Companies such as GIC/United India Insurance Co/Oriental Insurance Co/New India Assurance Co as provided under Second Proviso to section 194 of IT Act		full beneficial interest with respect to the shares owned by it (Annexure 1), along with PAN and copy of the certificate of registration issued by the IRDAI.
Govt. of India, Corporation 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 (Section 196)	NIL	Self-declaration specifying the specific Central Act under which such corporation is established and that their income is exempt under the provisions of Income Tax Act, 1961 along with a self-attested copy of the PAN card and registration certificate.
Mutual Funds	NIL 10%	Self-declaration (Annexure 2) that they are specified and covered under section 10(23D) of the Income Tax Act, 1961 along with a self-attested copy of PAN card and registration certificate. In case of mutual funds not covered under section 10 (23D) of the Income Tax Act, 1961
Alternative Investment Fund	NIL 10%	Documentary evidence to prove that the Investment Fund is a fund as defined in clause (a) of the Explanation 1 of Section 115UB of the IT Act and Self-declaration (Annexure 3) that its income is exempt under Section 10(23FBA) of the Income Tax Act, 1961 and they are governed by SEBI regulations as Category I or Category II AIF, along with a self-attested copy of the PAN card and registration certificate issued by SEBI. In case AIF other than those registered with SEBI as per Section 115UB of the Income Tax Act.
Order under section 197 of the Act	Rate provided in the order	Lower/NIL withholding tax certificate obtained from Income Tax authorities. The certificate should be valid for the financial year 2023-24 and should cover the dividend income.
Other resident shareholder without PAN/Invalid PAN/ or falling into the category of specified persons as per section 206AB of the Act	20%	-

II. For Non-Resident Shareholders

Sl	Particulars	Applicable Rate	Documents required (if any)
(a)	Non-resident Shareholders including Foreign Institutional Investors (FIIs) / Foreign Portfolio Investors (FPIs)	<p>20% (plus applicable surcharge and cess)</p> <p>OR</p> <p>Tax Treaty Rate (whichever is less)</p> <p>Non-resident shareholders have the option to be governed by the provisions of the Double Tax Avoidance Agreement ("DTAA") between India and the country of tax residence of the shareholder, if the DTAA provisions are more beneficial.</p>	<p>Update/Verify the PAN and the residential status as per IT Act if not already done, with the depositories (in case of shares held in demat mode) and with the Company's Registrar and Transfer Agents (in case of shares held in physical mode).</p> <p>Self-Attested Copy of SEBI Registration Certificate, as applicable.</p> <p>Provide declaration whether the investment in shares has been made under the general FDI route or under the FPI route, as applicable for FIIs/ FPIs.</p> <p>In order to apply the Tax Treaty rate, ALL the following documents would be required:</p> <ol style="list-style-type: none"> 1) Self-attested copy of Indian Tax Identification number (PAN). In case PAN is not available, the non-resident shareholder shall furnish (a) name, (b) email id, (c) contact number, (d) address in residency country, (e) Tax Residency Certificate and Tax Identification Number of the residency country (Annexure 7). 2) Self-attested Tax Residency Certificate (TRC) obtained from the tax authorities of the country of which the shareholder is a resident certifying status during Financial Year 2023-24. 3) Form 10F duly filled and signed. As you may already be aware, pursuant to Notification No. 03/2022 dated 16 July 2022 of the Central Board of Direct Tax (CBDT), Form 10F is required to be obtained electronically by the non-resident shareholders having Permanent Account Numbers (PAN), through the e-filing portal of the Income Tax website. However, in terms of the CBDT Notifications dated 12 December 2022 and 28 March 2023,

			<p>non-resident taxpayers not having PAN and also not required to have PAN as per the relevant provisions of the Act have been exempted from the mandatory electronic filing of Form 10F till 30 September 2023. Therefore, such category of taxpayers may furnish Form 10F in manual mode till 30 September 2023, along with an undertaking that they are so covered by the CBDT Notifications.</p> <p>4) Self-declaration from Non-resident, primarily covering the following (Annexure 7):</p> <ul style="list-style-type: none"> - Non-resident is eligible to claim the benefit of respective tax treaty - Non-resident receiving the dividend income is the beneficial owner of such income - Dividend income is not attributable/ effectively connected to any Permanent Establishment (PE) or Fixed Base or Business Connection or Place of Effective Management in India. - Non-resident complies with any other condition prescribed in the relevant Tax Treaty and provisions under the Multilateral Instrument ('MLI'), including Principal Purpose Test. - In case of shareholder being tax resident of Singapore, please furnish the letter issued by the competent authority or any other evidences demonstrating the non-applicability of Article 24 - Limitation of Relief under India-Singapore DTAA. <p>TDS shall be recovered at 20% (plus applicable surcharge and cess) if any of the above-mentioned documents are not provided.</p>
(b)	Non-resident shareholders submitting Order under Section 197 of the Act	Rate provided in the Order	Lower/Nil withholding tax certificate obtained from Income Tax authorities
(c)	Non-Resident	30% (plus	

	Shareholders who are tax residents of Notified Jurisdictional Area as defined under section 94A(1) of the IT Act	applicable surcharge and cess)	
(c)	Indian Branch of a Foreign Bank	NIL	Lower tax deduction certificate u/s 195(3) obtained from Indian Income Tax Authority. Self-declaration confirming that the income is received on its own account and not on behalf of the Foreign Bank and the same shall be included in taxable income of the branch in India.
(d)	Any non-resident shareholder exempted from tax deduction as per the provisions of IT Act or any other law such as The United Nations Privileges and Immunities) Act 1947, etc.	NIL	Necessary documentary evidence substantiating exemption from tax deduction as per Annexure 9

Please note that:

- a) **Recording of the valid Permanent Account Number (PAN) for the registered Folio/ DP id-Client Id is mandatory. In absence of valid PAN, tax will be deducted at a higher rate of 20% as per Section 206AA of the Act.**
- b) **Shareholders holding shares under multiple accounts under different status / category and single PAN, may note that, higher of the tax as applicable to the status in which shares held under a PAN will be considered on their entire holding in different accounts**

Kindly note that the Company is not obligated to apply the beneficial tax treaty rates at the time of tax deduction /withholding on dividend amounts. Application of beneficial rate of tax treaty for the purpose of withholding taxes shall depend upon completeness and satisfactory review by the Company of the documents submitted by the non-resident shareholder.

Accordingly, in order to enable us to determine the appropriate withholding tax rate applicable, we request you to provide these details and documents as mentioned, above, on or before September 04, 2024. Any documents submitted after September 04, 2024 will be accepted at the sole discretion of the Company.

SECTION 206AB OF THE ACT

Rate of TDS is subject to provisions of Section 206AB of the Act (effective from 1st July, 2021) which introduced special provisions for TDS in respect of taxpayers who have not filed their income-tax return (referred to as 'specified persons'). Section 206AB of the Act prescribes that tax is to be deducted at higher of the following rates in case of payments to 'specified persons':

- at twice the rate specified in the relevant provision of the Act; or
- at twice the rate or rates in force; or
- at the rate of 5%.

In cases where Section 206AB is applicable, tax will be deducted at higher of the rates prescribed in the section.

‘Specified person’ as defined u/s 206AB(3) of the IT Act is a person who has:

1. not filed return of income for the assessment year immediately prior to the previous year in which tax is required to be deducted, for which the time limit of filing return of income under sub-section (1) of section 139 has expired; and
2. subjected to tax deduction/collection at source in aggregate amounting to Rs.50,000 or more in each of such two immediate previous years.

Non-resident shareholders who do not have permanent establishment in India are excluded from the scope of a ‘specified person’. Accordingly, in case of non-resident shareholders, a self-declaration that they do not/ shall not have a permanent establishment in India during the FY 2023-24, shall be required to be provided to the Company.

For this purpose, the Company will rely on the online utility provided by Central Board of Direct Taxes (‘CBDT’) ‘Compliance Check for Sections 206AB’. In case, the shareholder fulfils the conditions of being a ‘specified person’ as per the CBDT online utility, then tax will be deducted at higher rate as provided under Section 206AB of the IT Act.

Further, if owing to non-availability of PAN of a shareholder who is a "specified person" under section 206AB of the Act, the provisions of section 206AA are also applicable, TDS would be deductible at the rate applicable under section 206AA or under section 206AB of the Act, whichever is higher.

In terms of Rule 37BA of the 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 such deductee should file declaration with the Company in the manner prescribed in the Rules, which shall inter alia contain-

- i. Name, address, PAN and residential status of the person to whom credit is to be given;
- ii. Payment in relation to which credit is to be given;
- iii. The reason for giving credit to such person;
- iv. Declaration that the dividend income is assessable in the hands of the beneficiaries of the shares (and not the custodian);
- v. Undertaking that the custodian will not claim credit of TDS from the dividend amount assessable in the hands of the beneficiaries.

Any such declaration received post September 04, 2024 shall be considered only at the sole discretion of the Company.

The above communication on TDS sets out the provisions of the law in a summary manner only and does not purport to be a complete analysis of all potential tax consequences. Shareholders should consult with their own tax advisors for the tax provisions which may be applicable to them.

Kindly note that the aforementioned documents are required to be emailed as mentioned below:

Resident shareholders to send to	:	tds@bigshareonline.com
Non-Resident shareholders to send to	:	tds@bigshareonline.com

These documents should reach us **on or before September 04, 2024** in order to enable the Company to determine and deduct appropriate TDS/withholding tax rate. The aforesaid documents such as Form 15G/ 15H, documents under section 196, 197A, FPI Registration Certificate, Tax Residency Certificate, Lower Tax certificate etc. should be sent on the aforesaid email-id as stated above. No communication on the tax determination/deduction shall be entertained post September 04, 2024. It may be further noted that in case the tax on said Final Dividend is deducted at a higher rate in the absence of receipt of the aforementioned details/documents from you or based on the review of the documents as provided to the Company, there would still be an option available with you to file the return of income and claim an appropriate refund, if eligible. No claim shall lie against the Company for such taxes deducted.

The tax credit can also be viewed in Form 26AS by logging in with your credentials (with valid PAN) at TRACES <https://www.tdscpc.gov.in/app/login.xhtml> or the e-filing website of the Income Tax department of India <https://www.incometax.gov.in/home>.

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/s, such Shareholder/s will be responsible to indemnify the Company and also, provide the Company with all information/documents and co-operation in any assessment or appellate proceedings.

Disclaimer: The information set out herein above is included for general information purposes only and does not constitute legal or tax advice. Since the tax consequences are dependent on facts and circumstances of each case, the investors are advised to consult their own tax consultant with respect to specific tax implications arising out of receipt of dividend.

For seeking any further clarification, please write to the RTA as per details given below:

Bigshare Services Private Limited

**Office No S6-2, 6th Floor, Pinnacle Business Park,
Next to Ahura Centre, Mahakali Caves Road,
Andheri (East) Mumbai – 400093.
Telephone No.: 022 – 62638200
Email: tds@bigshareonline.com
Or contact the Company at accounts@pluslighttech.com.**

Your co-operation in this regard is solicited.

Thanking you,

Yours faithfully,

For Focus Lighting And Fixtures Limited

**Sd/-
Drashti Senjaliya
Company Secretary & Compliance Officer**

Particulars	Link for download
Form 15G	https://bigshareonline.com/docs/FORM_15G.pdf
Form 15H	https://bigshareonline.com/docs/FORM_NO_15H.pdf
Form 10 F	https://bigshareonline.com/docs/Form_10F.pdf
Annexure 1 -Declaration format of Insurance Companies	https://bigshareonline.com/docs/Annexure%201_Declaration_format_of_Insurance_Companies.pdf
Annexure 2 - Declaration format of Mutual funds	https://bigshareonline.com/docs/Annexure%202_Declaration_format_of_Mutual_funds.pdf
Annexure 3 -Declaration format of AIF	https://bigshareonline.com/docs/Annexure%203_Declaration_format_of_AIF.pdf
Annexure 4 - Declaration for exemption under Circular 18	https://bigshareonline.com/docs/Annexure%204_Declaration%20for%20exemption%20under%20Circular%2018.pdf
Annexure 5 -Rule 37BC - Declaration for No PAN Cases	https://bigshareonline.com/docs/Annexure%205_Rule%2037BC.pdf
Annexure 7 -Self-Declaration Non- resident	https://bigshareonline.com/docs/Annexure_7_Self_Declaration_Non_resident_1_.pdf

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