

TAX RECKONER 2023 -24

The rates are applicable for the Financial Year 2023-24 (AY 2024-25)

A. Applicable Income Tax Rates - Investments in Mutual Fund Schemes Tax Implications on income distributed by mutual funds (i.e. dividend) received by Unitholders

Income distributed by a mutual fund			
	Resident Individual [RI] / HUF	Domestic Companies	Non-Resident Individual [NRI]
Equity oriented schemes	At applicable slab rates*	At applicable slab rates*	20%***
Other than equity oriented schemes	At applicable slab rates*	At applicable slab rates*	20%***
Tax deduction at source [TDS] by the scheme			
	RI /HUF	Domestic Companies	NRI
Equity oriented schemes	10%**	10%**	20%***
Other than equity oriented schemes	10%**	10%**	20%***

* Kindly refer Para B below for the applicable tax rates in case of individuals.

** Tax not deductible if dividend income in respect of mutual fund units is below Rs. 5,000 in a financial year.

*** plus applicable surcharge and cess

Capital Gains Taxation

	RI/HUF	Domestic Companies	NRI
Long Term Capital Gains (Units of equity oriented funds held for more than 12 months and 36 months in case of other units)			
Equity oriented schemes* (Refer to note below)	10% without indexation + 10% / 15% / 25% / 37% Surcharge ^S + 4% Cess	10% without indexation + 7%/12% Surcharge ^S + 4% Cess	10% without indexation + 10% / 15% / 25% / 37% Surcharge ^S + 4% Cess
	= 11.44% or 11.96% or 13% or 14.248%	= 11.128% or 11.648%	= 11.44% or 11.96% or 13% or 14.248%
Other than Equity oriented schemes (listed) and other than specified mutual funds**	20% with indexation + 10%/15%/ 25% / 37% Surcharge ^S + 4% Cess	20% with indexation + 7%/12% Surcharge as applicable ^{SS} + 4% Cess	20% with indexation + 10%/15% / 25% / 37% Surcharge ^S + 4% Cess
	= 22.88% or 23.92% or 26% or 28.496%	= 22.256% or 23.296%	= 22.88% or 23.92% or 26% or 28.496%
Other than Equity Oriented Schemes (unlisted) and other than specified mutual funds**	20% with indexation + 10%/15% / 25% / 37% Surcharge ^S + 4% Cess	20% with indexation + 7%/12% Surcharge as applicable ^{SS} + 4% Cess	10% without indexation + 10%/15% / 25% / 37% Surcharge ^S + 4% Cess
	= 22.88% or 23.92% or 26% or 28.496%	= 22.256% or 23.296%	= 11.44% or 11.96% or 13% or 14.248%

Note: Long term capital gains on transfer of equity shares or units of equity oriented funds shall be liable to tax at the rate of 10% on capital gains in excess of Rs. 1 lakh subject to payment of Securities Transaction Tax [STT] in accordance with section 112A. In order to compute the capital gains arising on transfer of these shares or units of equity oriented funds, the cost of acquisition of such units shall be higher of the following –

- Actual cost of acquisition; and
- Lower of –
 - Fair market value [FMV] as on 31 January 2018 (as per prescribed method); and
 - Full value of consideration received or accruing as result of transfer As per the prescribed method, the FMV as on 31

January 2018 is as follows:

Circumstances	FMV
In case where capital asset is listed on recognized stock exchange	Highest price of capital asset quoted on such exchange on 31 January 2018
In case there is no trading in such asset on such exchange on 31 January 2018	Highest price of such asset on such exchange on a date immediately preceding 31 January 2018 when such asset was traded
In case where a unit is not listed on recognized stock exchange	Net asset value of such asset as on 31 January 2018

Benefits of deduction under chapter VI-A and rebate under section 87A shall not be available on such long term capital gains income.

Meaning of 'Equity oriented Mutual Fund' [as per Explanation to Section 112A]

Equity oriented Mutual fund is defined to include the mutual funds where minimum 65% of proceeds is invested in equity shares of listed domestic companies and specified funds of funds (i.e., a fund where minimum 90% of proceeds of such fund is invested in another fund and such fund has invested minimum 90% of proceeds in equity shares of listed domestic companies.) The percentage of equity shareholding or unit held in respect of a fund is to be computed using the annual average of the monthly averages of opening and closing figures.

Meaning of 'Specified Mutual Fund' [as per Section 50AA]

The Finance Act, 2023 has inserted a new section 50AA which provides special provision for computation of capital gains in case of Market Linked Debentures and Specified Mutual Funds. In terms of the said section, gains arising from transfer, redemption or maturity of market linked debenture or a unit of a Specified Mutual Fund acquired on or after 1 April 2023 would be deemed to as Short term capital gain [STCG].

The meaning of a 'Specified Mutual Fund' has been provided as a mutual fund wherein not more than 35% of total proceeds are invested in the equity shares of domestic companies. The equity shareholding of the Specified Mutual Fund is to be computed using the annual average of the daily closing figures. It is provided that no deduction of STT paid shall be allowed in computing such STCG.

**Hence, the above taxation rate on LTCG for other than equity oriented mutual funds and other than specified mutual funds (i.e., row 2 and 3 of above table) are for the units acquired before 1 April 2023 wherein exposure in equity shares is less than 65% and/ or for the units acquired on or after 1 April 2023 wherein exposure in equity shares is more than 35% but less than 65%.

	RI/HUF	Domestic Companies	NRI
Short Term Capital Gains [Units of equity oriented mutual fund schemes held for less than or equal to 12 months/ 36 months (in case of other units) and units of Specified Mutual Funds acquired on or after 1 April 2023 (irrespective of holding period)]			
Equity oriented schemes*	15% + 10%/15%/ 25% / 37% Surcharge [§] + 4% Cess	15%+ 7%/12% Surcharge as applicable ^{§§} + 4% Cess	15% + 10%/15%/ 25% / 37% Surcharge [§] + 4% Cess
	= 17.16% or 17.94% or 19.5% or 21.372%	= 16.692% or 17.472%	= 17.16% or 17.94% or 19.5% or 21.372%
Other than Equity oriented schemes and other than Specified Mutual Funds***	30% [^] + 10%/15%/ 25% / 37% Surcharge [§] + 4% Cess	30% ^{**} +7%/12% Surcharge as applicable ^{§§} + 4% Cess	30% [^] + 10%/15%/ 25% / 37% Surcharge [§] + 4% Cess
	= 34.32% or 35.88% or 39% or 42.744%	= 33.384% or 34.944%	= 34.32% or 35.88% or 39% or 42.744%
Specified Mutual funds (units acquired on or after 1 April 2023)***	30% [^] + 10%/15%/ 25% / 37% Surcharge [§] + 4% Cess	30% ^{**} +7%/12% Surcharge as applicable ^{§§} + 4% Cess	30% [^] + 10%/15%/ 25% / 37% Surcharge [§] + 4% Cess
	= 34.32% or 35.88% or 39% or 42.744%	= 33.384% or 34.944%	= 34.32% or 35.88% or 39% or 42.744%

* STT will be deducted on equity oriented schemes at the time of redemption and switch to the other schemes. Mutual Fund would also pay STT wherever applicable on the securities sold.

** In case of domestic companies whose turnover or gross receipts does not exceed Rs. 400 crore during the previous year, the applicable tax rate shall be 25%. Accordingly, in cases of such small domestic companies, the applicable tax rate on short-term capital gains shall be 27.82% or 29.12%.

***In the above taxation rate on STCG for other than equity oriented mutual funds and other than specified mutual funds (i.e., row 2 of above table) are for the units acquired before 1 April 2023 wherein exposure in equity shares is less than 65% and/ or for the units acquired on or after 1 April 2023 wherein exposure in equity shares is more than 35% but less than 65%. Also, the above taxation rate on STCG for specified mutual funds (i.e., row 3 of above table) are for the units acquired on or after 1 April 2023, wherein exposure in equity shares is 35% or less.

From AY 2020-21 onwards domestic companies can opt for a lower tax rate of 22% (plus surcharge of 10% and cess of 4%) as per section 115BAA/ 115BAB subject to prescribed conditions. Accordingly, in such cases, the applicable tax rate on STCG shall be 25.17%.

^ Assuming the investor falls into highest tax bracket

TDS on capital gains by the schemes (Applicable only to NRI investors)		
	STCG [§]	LTCG [§]
Equity oriented schemes	17.16% or 17.94% or 19.5% or 21.372%	11.44% or 11.96% or 13% or 14.248%
Other than Equity oriented schemes (listed)	34.32% or 35.88% or 39% or 42.744%	22.88% or 23.92% or 26% or 28.496% [@]
Other than Equity oriented schemes (unlisted)	34.32% or 35.88% or 39% or 42.744%	11.44% or 11.96% or 13% or 14.248%

[@]After providing for indexation

Note – The above TDS in case of STCG shall also be applicable if units of Specified Mutual Fund as defined under Section 50AA is sold/ redeemed to NRI Investors.

*STT will be deducted on equity oriented schemes at the time of redemption and switch to the other schemes. Mutual Fund would also pay STT wherever applicable on the securities sold.

SURCHARGE RATES

\$ In case of individual / HUF unit holders, surcharge rates as are indicated below:

Taxable Income	Surcharge rate
exceeds Rs. 50 lakhs but is less than Rs. 1 crore	10%
exceeds Rs. 1 crore but is less than Rs. 2 crore	15%
exceeds Rs. 2 crore but is less than Rs. 5 crore	25%#
exceeds Rs. 5 crore	37%#

#For income covered under provisions of sections 111A and 112A of the Act or the dividend income, surcharge rate shall be restricted to 15% where income exceeds Rs 2 crore. Further, maximum surcharge rate shall be 25% in case of individuals who has opted for new tax regime under section 115BAC.

\$\$ For Domestic Companies/Firms

Taxable Income	Surcharge rate
Above Rs 1 crore upto Rs 10 crores	7%
Above Rs 10 crores	12%

Surcharge rate shall be 10% in case domestic companies opting taxation under section 115BAA and section 115BAB on any income earned.

In case of firm with total income exceeding Rs 1 crore, surcharge rate shall be 12%.

For Foreign Companies

Taxable Income	Surcharge rate
Above Rs 1 crore upto Rs 10 crores	2%
Above Rs 10 crores	5%

^Assuming the investor falls into the highest tax bracket @ after providing for indexation

Note:

- A non-resident tax payer has an option to be governed by the provisions of the Income tax Act, 1961 or the provisions of the relevant Double Taxation Avoidance Agreement [DTAA], whichever is more beneficial. As per the Income-tax Act, 1961 submission of tax residency certificate ("TRC") will be necessary for granting DTAA benefits to non-residents. A taxpayer claiming DTAA benefit shall furnish a TRC of his residence obtained by him from the Government of that country or specified territory. Further, if the prescribed information is not in TRC, in addition to the TRC, the non-resident may be required to provide a self-declaration in Form 10F or such other documents and information subsequently, as may be prescribed by the Indian Tax Authorities.
- It is to be noted that Form 10F is now mandatorily required to be file online on the income tax portal. The non-resident who are not having PAN and are not required to have PAN as per the relevant provisions of the Act read with relevant Rules were exempted from mandatory electronic filing of Form 10F till 31 March 2023. The CBDT has issued the notification extending this exemption to 30 September 2023 for such category of non-residents. However, it is clarified that such category of non-resident taxpayers must furnish manual form till 30 September 2023.
- The provisions of section 206AA (higher withholding tax rate of 20%) shall not apply to non-residents or a foreign company who is not having PAN inter alia in respect of payments in the nature of dividend and payments on transfer of any capital asset if the non-resident receiver furnishes the following:
 1. Name, e-mail id, contact number
 2. Address in the country / territory of which the person is a resident
 3. Certificate of his being a resident of the country / territory (i.e., TRC) issued by the Government thereof
 4. Tax identification number / unique identification number in that country

Higher rate of TDS for non-filers of return of income

The Finance Act, 2021 has introduced section 206AB (applicable from 1 July 2021) providing for TDS at twice the applicable rate in case of payments to specified person (except non-resident not having permanent establishment in India) who have not filed return of income for past two Assessment Years [AYs] for which time limit for filing return has expired and the aggregate TDS in their case is Rs. 50,000 or more in each of these two years. Additionally, if provisions of section 206AA are also applicable then tax is to be deducted at higher of the two rates provided i.e. rate as per section 206AB or section 206AA. The Finance Act, 2023 has amended the proviso to Section 206AB and has also excluded a person who is not required to furnish the return of income for the assessment year relevant to the said previous year and is notified by the Central Government in the Official Gazette in this behalf from the specified persons.

Non linking of PAN with Aadhaar

The CBDT vide its Press Release dated 28 March 2023 has extended the last date of linking of PAN and Aadhaar to 30 June 2023. CBDT has also issued the Notification No. 15/2023 where in exercise of powers conferred by Section 139AA read with Section 295 of the Act has amend the Rule 114AAA of the Income tax Rules, 1962 [the Rules] which is effective from 1 April 2023. In terms of Amended Rule 114AAA of the Rules, where a person, who has been allotted the PAN and is required to intimate his Aadhaar number under section 139AA of the Act, has failed to intimate the same on or before the 31 March 2022, the PAN of such person shall become inoperative immediately after the said date for the purposes of furnishing, intimating or quoting under the Act. Such cases of inoperative PAN shall tantamount to PAN not being furnished, intimated or quoted as the case may be and the said person shall be liable for all the consequences under the Act for not furnishing, intimating or quoting the PAN including withholding at higher rate under section 206AA of the Act.

Consequent to the above-mentioned notification, CBDT has issued a Circular No. 3 of 2023, where it has clarified that a person who has failed to intimate the Aadhaar Number will face the consequences mentioned in amended Rule 114AAA(3) as a result of his PAN becoming inoperative shall take into effect from 1 July 2023 and continue till the PAN becomes operative. Also, a fee of Rs. 1000 will continue to apply to make PAN operative by intimating the Aadhaar Number.

Accordingly, provisions of section 206AA would be applicable and tax could be withheld at a higher rate of 20% if PAN is not linked with Aadhaar upto 30 June 2023.

Bonus Stripping: The loss due to sale of original units in schemes, where bonus units are issued, will not be available for set off; if original units are: (A) bought within three months prior to the record date fixed for allotment of bonus units; and (B) sold within nine months after the record date fixed for allotment of bonus units. However, the amount of loss so ignored shall be deemed to be the cost of purchase or acquisition of such unsold bonus units.

The Finance Act, 2022 has amended section 94(8) of the Income-tax Act, 1961 to cover securities as well under the ambit of bonus stripping with effect from 1 April 2023.

Period of holding and cost of acquisition for segregated portfolios

Section 2(42A) is amended (from AY 2020-21 onwards) to include the earlier period of holding of the units in the main scheme while considering the period of holding of the units in the segregated portfolio. Further, section 49 is also amended to provide for computing the "cost of acquisition" of the units in the segregated portfolio, the "cost of acquisition" of the units in the main scheme will be pro-rated in the ratio of the NAV of the assets transferred to the segregated portfolio. The "cost of acquisition" of the units in the main scheme will simultaneously be reduced by the "cost of acquisition" of the units in segregated portfolio.

B. INCOME TAX RATES (For FY 2023-24 i.e. relevant to AY 2024-25)**(i) For Individual, Hindu Undivided Family, Association of Persons, Body of Individuals and Artificial juridical persons. Old Regime**

Taxable Income	Tax Rates
Up to Rs. 250,000 (a) (b)	NIL
Rs. 250,001 to Rs. 500,000 (d)(e)	5%
Rs. 500,001 to Rs. 10,00,000 (d)	20%
Rs. 10,00,001 and above(c)(d)	30%

(a) In the case of a resident individual of the age of 60 years or above but below 80 years, the basic exemption limit is Rs 300,000 under the old regime.

(b) In case of a resident individual of age of 80 years or above, the basic exemption limit is Rs 500,000 under the old regime.

(c) Surcharge is applicable as under:

Taxable Income	Surcharge rate
exceeds Rs. 50 lakhs but is less than Rs. 1 crore	10%
exceeds Rs. 1 crore but is less than Rs. 2 crore	15%
exceeds Rs. 2 crore but is less than Rs. 5 crore	25%
exceeds Rs. 5 crore	37%

Marginal relief for such person is available [refer to the note (\$) mentioned at page no. 3 above]

(d) Health and Education cess @ 4% is applicable.

(e) Resident individuals having total income not exceeding Rs. 5,00,000 can avail rebate of 12,500 or actual tax liability whichever is lower

Option for individuals and HUF to apply for the simplified tax regime subject to satisfaction of certain conditions and prescribed procedures. Generally speaking, all deductions/ exemptions (other than specifically permitted) are to be foregone, if they opt for the new simplified tax regime.

For Individuals, Hindu Undivided Family, Association of Persons, Body of Individuals and Artificial juridical persons**New Regime [under Section 115BAC]**

Total Income	Tax Rate
Up to 3,00,000	Nil
From 3,00,001 to 6,00,000	5%
From 6,00,001 to 9,00,000	10%
From 9,00,001 to 12,00,000	15%
From 12,00,001 to 15,00,000	20%
Above 15,00,000	30%

Maximum Surcharge rate shall be 25% in case of individuals who has opted for new tax regime under section 115BAC

(ii) Securities Transaction Tax (STT)

STT is levied on the value of taxable securities transactions as under

Transaction	Rates	Payable By
Purchase/ Sale of equity shares (delivery based)	0.1%	Purchaser/ Seller
Purchase of units of equity oriented mutual fund	Nil	Purchaser
Sale of units of equity oriented mutual fund (delivery based)	0.001%	Seller
Sale of equity shares, units of business trust, units of equity oriented mutual fund (non-delivery based)	0.025%	Seller
Sale of an option in securities	0.0625%	Seller
Sale of an option in securities, where option is exercised	0.125%	Purchaser
Sale of a futures in securities	0.0125%	Seller
Sale or surrender or redemption of a unit of an equity oriented fund to an insurance company, on maturity or partial withdrawal, with respect to unit linked insurance policy issued by such insurance company on or after the first day of February, 2021	0.001%	Seller
Sale of units of an equity oriented fund to the Mutual Fund	0.001%	Seller
Sale of unlisted equity shares and units of business trust under an initial offer	0.2%	Seller

(iv) Capital Gain

Sr. No	Particulars	STCG rates (a)	LTCG rates (a)
I	Sale transactions of listed equity shares / units of an equity oriented scheme which attract STT [^] (STCG, if units held for 12 months or less and LTCG, if units held for more than 12 months)	15%	10%*
II	Sale transaction of units other than units mentioned above (without STT) (STCG, if units held for 36 months or less and LTCG, if units held for more than 36 months**)		
	Individuals (resident and non-resident)	Progressive slab rates - as per Income Tax Rates (B) above	20% / 10% (b) (c)
	Firms including LLP (resident and non-resident)	30%	
	Resident Companies	30% / 25% ^(d) / 22% ^(e) / 15% ^(f)	
	Overseas financial organisations specified in section 115AB	40% (Corporate) 30% (Non-corporate)	10% for units purchased in foreign currency
	FIs	30%	10%
	Other Foreign Companies	40%	20% / 10% (c)
	Local Authorities	30%	20% / 10%
	Co-operative Society Rates	Progressive slab or 22%(g) / 15%(h)	
III	Sale transaction of specified mutual fund units acquired on or after 1 April 2023 (irrespective of holding period)		No LTCG
	For all categories as under Sr. No. II	Same as above for Sr. No II	

[^]The concessional rate of 10% and 15% shall be applicable only if:

- In case of equity shares, STT is paid at the time of sale and at the time of acquisition of shares; and
- In case of unit of equity oriented fund, STT is paid at the time of sale

* Income-tax at the rate of 10% to be levied on LTCG exceeding Rs. 1 lakh (without indexation benefit and foreign exchange fluctuation).

** For sale transaction of unlisted shares (STCG if shares held for 24 months or less and LTCG if shares held for more than 24 months).

(a) These rates will further increase by applicable surcharge & health and education cess as mentioned above.

(b) Income-tax rate of 20% with indexation if listed securities.

(c) Long term capital gains arising to a non-resident from transfer of unlisted securities or shares of a company, not being a company in which the public are substantially interested, subject to 10% tax (without benefit of indexation and foreign currency fluctuation).

(d) If total turnover or gross receipts in the financial year 2021-22 does not exceed Rs. 400 crores.

(e) This lower rate is optional and subject to fulfillment of certain conditions as provided in section 115BAA.

(f) This lower rate is optional for companies engaged in manufacturing business (set-up & registered on or after 1 October 2019) subject to fulfillment of certain conditions as provided in section 115BAB.

(g) Co-operative societies have the option to be taxed at progressive slab rates or 22% subject to fulfillment of certain conditions as provided in section 115BAD.

(h) This lower rate is optional for co-operative societies engaged in manufacturing or production business (set-up & registered on or after 1 April 2023) subject to fulfillment of certain conditions as provided in section 115BAE.

C. PERSONAL TAX SCENARIOS (FY 2023-24 i.e. relevant for AY 2024-25)

Individual	Total Income								
	475,000	675,000	825,000	1,000,000	1,500,000	5,650,000	11,150,000	21,150,000 #	51,150,000 #
Tax in FY 2023-24 (Old Regime)*	NIL***	18,200	49,400	85,800	226,200	1,673,100	3,722,550	7,946,250	21,532,290
Tax in FY2023-24 (New Regime)**	NIL***	NIL***	39,000	62,400	156,000	1,595,880	3,641,820	7,858,500	19,558,500
Additional Tax burden/ (Savings) in New Regime	-	(18,200)	(10,400)	(23,400)	(70,200)	(77,220)	(80,730)	(87,750)	(1,973,790)
Additional Tax burden/ (Savings) (%) in New Regime	-	(100%)	(21.05%)	(27.27%)	(31.03%)	(4.62%)	(2.17%)	(1.10%)	(9.17%)

Resident senior citizen (age of 60 years but below 80 years)	Total Income								
	475,000	675,000	825,000	1,000,000	1,500,000	5,650,000	11,150,000	21,150,000 #	51,150,000 #
Tax in FY 2023-24 (Old regime) *	NIL***	15,600	46,800	83,200	223,600	1,670,240	3,719,560	7,943,000	21,528,728
Tax in FY2023-24 (New Regime)**	NIL***	NIL***	39,000	62,400	156,000	1,595,880	3,641,820	7,858,500	19,558,500
Additional Tax burden/ (Savings) in New Regime	-	(15,600)	(7,800)	(20,800)	(67,600)	(74,360)	(77,740)	(84,500)	(1,970,228)
Additional Tax burden/ (Savings) (%) in New Regime	-	(100%)	(16.67%)	(25.00%)	(30.23%)	(4.45%)	(2.09%)	(1.06%)	(9.15%)

Resident senior citizen (age 80 years and above)	Total Income								
	475,000	675,000	825,000	1,000,000	1,500,000	5,650,000	11,150,000	21,150,000 #	51,150,000 #
Tax in FY 2023-24 (Old Regime) *	NIL	5200	36,400	72,800	213,200	1,658,800	3,707,600	7,930,000	21,514,480
Tax in FY 2023-24 (New Regime) **	NIL	NIL***	39,000	62,400	156,000	1,595,880	3,641,820	7,858,500	19,558,500
Additional Tax burden/ (Savings) in New Regime	-	(5200)	2600	(10,400)	(57,200)	(62,920)	(65,780)	(71,500)	(1,955,980)
Additional Tax burden/ (Savings) (%) in New Regime	-	(100%)	7.14%	(14.29%)	(26.83%)	(3.79%)	(1.77%)	(0.90%)	(9.09%)

* For purpose of tax calculation under Old Regime, ad hoc deduction of INR 150,000 has been claimed. The ad hoc deduction is only illustrative in nature. Basis actual deduction, the tax amount will vary.

** For purpose of tax calculation under New Regime, no exemption/ deductions have been claimed and it has been proposed that enhanced surcharge of 37% should not apply.

*** NIL tax on account of rebate under section 87A.

If the said taxable income includes income by way of dividend on shares and short-term capital gains in case of listed equity shares, equity oriented mutual fund units, units of business trust and long-term capital gains, then enhanced surcharge of 37% and 25% would not be applicable and accordingly effective tax rate would be lower.

Notes:

1. The tax rates mentioned above are only intended to provide general information and are neither designed nor intended to be a substitute for professional tax advice. Applicability of the tax rates would depend upon nature of the transaction, deductions available, rebates, the tax consequences thereon and the tax laws in force at the relevant point in time. Therefore, users are advised that before making any decision or taking any action that might affect their finances or business, they should take professional advice.
2. A non-resident tax payer has an option to be governed by the provisions of the Income tax Act, 1961 or the provisions of the relevant DTAA, whichever is more beneficial. As per the Income-tax Act, 1961 submission of tax residency certificate ("TRC") will be necessary for granting DTAA benefits to non-residents. A taxpayer claiming DTAA benefit shall furnish a TRC of his residence obtained by him from the Government of that country or specified territory. Further if the prescribed information is not in TRC, in addition to the TRC, the non-resident may be required to provide a self-declaration in Form 10F such other documents and information subsequently, as may be prescribed by the Indian Tax Authorities. It is to be noted that Form 10F is now required to be filed online on the income tax portal. The non-resident who are not having PAN and are not required to have PAN as per the relevant provisions of the Act read with relevant Rules are exempted from mandatory electronic filing of Form 10F till 30 September 2023. However, such category of non-resident taxpayers must furnish manual form till 30 September 2023.

The Base Erosion and Profit Shifting [BEPS] actions requiring amendment to DTAA, are implemented by way of signing of the multilateral instrument [MLI]. India's signing of the MLI will amend the DTAA's entered into by India with other countries that are signatories to the MLI. The MLI is effective 1 April 2020 for some of the DTAA's signed by India, and hence the MLI provisions will also have to be examined alongside the DTAA provisions.

3. In terms of Chapter XA of the Act, General Anti Avoidance Rule (GAAR) may be invoked notwithstanding anything contained in the Act. Due to this, any arrangement entered into by a taxpayer may be declared to be impermissible avoidance arrangement, as defined in that Chapter and the consequence would be inter alia denial of tax benefit. This would also include denial of the benefit of the DTAA to an investor if the tax Authorities declares any arrangement to be an impermissible avoidance arrangement. The GAAR provisions are applicable with effect from the Financial Year 2017-18.

LIMITATION

Our views expressed in the statement enclosed are based on the facts and assumptions indicated above. No assurance is given that the revenue authorities / courts will concur with the views expressed herein. Our views are based on the existing provisions of law and its interpretation, which are subject to change from time to time. We do not assume responsibility to update the views consequent to such changes. Reliance on the statement is on the express understanding that we do not assume responsibility towards the investors who may or may not invest in the Offer relying on the statement.

This statement has been prepared solely in connection with the Offer under the Regulations as amended.

Disclaimer: The information set out above is included for general information purposes only and does not constitute legal or tax advice. In view of the individual nature of the tax consequences, each investor is advised to consult his or her own tax consultant with respect to specific tax implications arising out of their participation in the Scheme. Income Tax benefits to the mutual fund & to the unit holder is in accordance with the prevailing tax laws as certified by the mutual funds tax consultant. Any action taken by you on the basis of the information contained herein is your responsibility alone. Canara Robeco Mutual Fund will not be liable in any manner for the consequences of such action taken by you. The information contained herein is not intended as an offer or solicitation for the purchase and sales of any schemes of Canara Robeco Mutual Fund.

Mutual Fund investments are subject to market risks, read all scheme related documents carefully.