

COMPILATION OF NON-RESIDENT SPECIAL RATES:

SR NO	PARTICULARS	115A (1 ST INT)	115A (2 ND INT)	115A (3 RD INT) NR/FC
1. 2.	ENTITY	NR/FC	NR/FC	
3.	PAYER INSTRUMENTS WITH	GOVT/INDIAN CONCERN	INFRASTRUCTURE DEBT INDIAN COMPANY FUND	
	TIMING	LOAN IN FOREIGN CURRENCY	LOAN IN ANY CURRENCY	LOAN + LT BONDS + FOREIGN CURRENCY (BORROWED BETWEEN – 1/7/2012 TO 30/06/2023) – 5% RDB IN ANY CURRENCY ISSUED TILL 30.06.2023 – 5 % * LT BONDS + RDB + LISTED IN RSE + IFSC FROM 1.4.2020 30.06.2023 – 4 FROM 1.7.2023 – 9%.
4.	RATES OF TAX SEC	20% (195)	5% (194LB)	5%/4%/9% (194LC)
5.	28 TO 44C CH VIA	NO	NO	NO
6.	SET OFF OF LOSS	NO. BUT SEC 80LA NO.	NO. BUT SEC 80LA NO.	BUT SEC 80LA
7.	OTHER INCOMES	ALLOWED	ALLOWED	ALLOWED
8.	ROI	YES	YES	YES
9.		NORMAL RATES. CH VIA NORMAL ALSO ALLOWED	NORMAL RATES. CH NORMAL RATES. VIA ALSO ALLOWED	NORMAL RATES. CH VIA ALSO ALLOWED
		NO ROI IF : (i) ONLY INT INCOME ; AND (ii) TDS DEDUCTED NOT LOWER THAN 115A RATES	SAME	SAME
10.	1ST PROVISIO TO SEC 48	NA NA	NA NA	NA NA
11.	2ND PROVISIO TO SEC 48			

SR NO	PARTICULARS	115A (4TH INT) FII/QFI	115A ROYALTY & FTS + NO PE	44DA ROYALTY & FTS + PE
1.	ENTITY		NR/FC + AGREEMENT + APPROVED BY CG	NR/FC + AGREEMENT + APPROVED BY CG
2.	PAYER	INDIAN COMPANY/ GOVT	INDIAN CONCERN/GOVT	INDIAN CONCERN/GOVT
3.	INSTRUMENTS WITH TIMING	RDB + GOVT SECURITIES + ANY CURRENCY + INT PAYABLE FROM 1/6/2013 TO 30/06/2023. MUNICIPAL DEBT SEC + FROM PAYABLE 1/6/2020 TO 30/06/2023	PROVISION OF SERVICE FOR ROYALTY OR FTS + NO PE IN INDIA	PROVISION OF SERVICE FOR ROYALTY OR FTS + PE IN INDIA
4.	RATES OF TAX SEC 28 TO	5% (194LD) NO NO. BUT SEC 80LA YES	20% OR DTAA (LOWER) NORMAL RATES 195	195
5.	44c	ALLOWED	NO	YES **
6.	CH VIA	YES		YES
7.	SET OFF OF LOSS	NORMAL		
8.	OTHER INCOMES		YES	
9.	ROI 1ST PROVISIO TO SEC	RATES. CH VIA ALSO ALLOWED	NORMAL RATES. CH VIA ALSO ALLOWED	NORMAL RATES. CH VIA ALSO ALLOWED
10.	48	SAME	SAME NA	FILE ROI ALWAYS +
11.	2ND PROVISIO TO SEC 48	NA	NA	AUDIT
		NA		NA
				NA

SR NO	PARTICULARS ENTITY	115AB OVERSEAS	115AC NR/FC	115AD FII/SPECIFIED FUND	CH XIIA - 115C TO I
1.	PAYER	FINANCIAL ORG NA	NA	NA	NRI NA
2.	INSTRUMENTS	UNITSOFFUTI&			SPECIFIED ASSETS
3.	WITH TIMING				
		MF+ FOREIGN CURRENCY	INDIANCOMPANY ANY BONDS + FC. PSU BONDS SOLD BY GOVT + FC. GDR + FC. (NOTIFIED BY CG)	SECURITIES OTHER THAN SEC 115AB + ANY CURRENCY	IN FOREIGN CURRENCY: (i) INDIAN CO SHARES (PUBLIC OR PVT) CO (ii) PUBLIC DEBENTURES (iii) PUBLIC CO DEPOSITS (iv) GOVT SEC
4.	RATES OF TAX	INCOME - 10% LTCG - 10%/ 12.5% FROM 23 RD JULY SEC 196B	INT- 10% LTCG -10%/ 12.5% FROM 23 RD JULY SEC 196C	- LTCG - 10% EVEN AFTER 23 RD JULY - STCG - 30% -111A STCG - 15%/ 20%FROM 23 RD JULY - 112A LTCG - 10%/ 12.5% WITH RS 1.25 LAC EXEMPT - INT/DIVIDEND - FII - 20%, SF - 10% - INT U/S 194LD-5% (196D) RABIT ARE ALLOWED ONLY TO THE EXTENT UNITS HELD BY NR. NO NO YES	INT- 20% LTCG - 10%/ 12.5% FROM 23 RD JULY 112A LTCG - 10%/ 12.5% FROM 23 RD JULY, WITH RS 1.25 LAC EXEMPT SEC 195 SPECIAL EXEMPTION 115F U/S FOR INVESTING NSC. THIS CHAPTER XII-A IS OPTIONAL.
5.	SEC 28 TO 44c	NO NO YES	NO		NO
6.	CH VIA	NORMAL RATES. NORMAL	NO YES		NO
7.	SET OFF OF LOSS				YES
8.	OTHER INCOMES ROI	CH VIA ALSO ALLOWED	CH VIA ALSO ALLOWED	RATES. NORMAL RATES. CH NORMAL VIA ALSO ALLOWED	RATES. CH VIA ALSO ALLOWED
9.		FILE ALWAYS	NO ROI IF:	FILE ALWAYS	NO ROI IF:

			(I) ONLY INT INCOME AND; (II) TDS DEDUCTED		(I) ONLY INT/LTCG AND; (II) TDS DEDUCTED
10.	1ST PROVISIO TO NO SEC 48		NO	NO	YES
11.	2ND PROVISIO TO NO SEC 48		NO	NO	NO

NOTES:

- (1) * INTEREST I.R.OF RUPEE DENOMINATED BONDS MENTIONED IN SEC 194LC IS EXEMPT FROM TAX IF RDB ARE ISSUED FROM 17.09.2018 TO 31.03.2019. {SEC 10(4c)}
- (2) ** NO DEDUCTION SHALL BE ALLOWED:
- (i) IN RESPECT OF ANY EXPENDITURE OR ALLOWANCE WHICH IS NOT WHOLLY AND EXCLUSIVELY INCURRED FOR THE BUSINESS OF SUCH PERMANENT ESTABLISHMENT OR FIXED PLACE OF PROFESSION IN INDIA
- (ii) IN RESPECT OF ANY AMOUNT IF ANY PAID BY THE PERMANENT ESTABLISHMENT TO ITS HEAD OFFICE OR TO ANY OF ITS OTHER OFFICES.
- NOTE: HOWEVER, DEDUCTION SHALL BE ALLOWED IN RESPECT OF REIMBURSEMENT OF ACTUAL EXPENSES INCURRED BY HEAD OFFICE OR OTHER OFFICES PROVIDED THAT SUCH EXPENSES ARE INCURRED FOR THE PE IN INDIA.
- (3) AS PER SEC 10(15)(ix) ANY INCOME BY WAY OF INTEREST PAYABLE TO A NR BY A UNIT IN AN IFSC I.R.OF MONIES BORROWED BY IT ON OR AFTER 1ST SEPTEMBER, 2019.
- (4) DIVIDEND INCOME EARNED BY NR OR FOREIGN COMPANY SHALL BE TAXABLE AT 20% PLUS SURCHARGE IF APPLICABLE AND CESS. HOWEVER, IF IT IS RECEIVED FROM A UNIT OF IFSC THEN 10%.
- (5) NO MAT WILL BE APPLICABLE FOR INTEREST, DIVIDEND, ROYALTY AND CAPITAL GAIN ON SECURITIES IF THE NORMAL RATE OF TAX IS LESS THAN MAT RATE I.E 15%.
- (6) ALL TAX RATES WILL BE SUBJECT TO SURCHARGE IF APPLICABLE & CESS ALWAYS. HOWEVER, IN CASE DTAA RATE IS TAKEN, THEN NO SURCHARGE & CESS SHALL BE APPLIED.