

India-USA (ARTICLE 2)

ARTICLE 2**OBLIGATIONS TO OBTAIN AND EXCHANGE INFORMATION WITH RESPECT TO REPORTABLE ACCOUNTS**

1. Subject to the provisions of Article 3 of this Agreement, each Party shall obtain the information specified in paragraph 2 of this Article with respect to all Reportable Accounts and shall annually exchange this information with the other Party on an automatic basis pursuant to the provisions of Article 28 of the Convention.

2. The information to be obtained and exchanged is:

(a) In the case of India with respect to each U.S. Reportable Account of each Reporting Indian Financial Institution:

- (1) the name, address, and U.S. TIN of each Specified U.S. Person that is an Account Holder of such account and, in the case of a Non-U.S. Entity that, after application of the due diligence procedures set forth in Annex I, is identified as having one or more Controlling Persons that is a Specified U.S. Person, the name, address, and U.S. TIN (if any) of such entity and each such Specified U.S. Person;
- (2) the account number (or functional equivalent in the absence of an account number);
- (3) the name and identifying number of the Reporting Indian Financial Institution;
- (4) the account balance or value (including, in the case of a Cash Value Insurance Contract or Annuity Contract, the Cash Value or surrender value) as of the end of the relevant calendar year or other appropriate reporting period or, if the account was closed during such year, immediately before closure;
- (5) in the case of any Custodial Account:
 - (A) the total gross amount of interest, the total gross amount of dividends, and the total gross amount of other income generated with respect to the assets held in the account, in each case paid or

India-UK (ARTICLE 2)

UK**ARTICLE 2
TAXES COVERED**

1. The taxes which are the subject of this Convention are :

- (a) in the United Kingdom :
 - (i) the income-tax;
 - (ii) the corporation tax;
 - (iii) the capital gains tax; and
 - (iv) the petroleum revenue tax;
 (hereinafter referred to as "United Kingdom tax");
- (b) in India;

the income-tax including any surcharge thereon;

 (hereinafter referred to as "Indian tax").

2. This Convention shall also apply to any identical or substantially similar taxes which are imposed by either Contracting State after the date of signature of this Convention in addition to, or in place of, the taxes of that Contracting State referred to in paragraph 1 of this Article. The competent authorities of the Contracting States shall notify each other of any substantial changes which are made in their respective taxation laws.

India-South Africa (ARTICLE 2)

SOUTH AFRICA**ARTICLE 2
TAXES COVERED**

1. The existing taxes to which this Agreement shall apply are :

- (a) in India, the income-tax (including any surcharge thereon);
(hereinafter referred to as "Indian tax");
- (b) in South Africa :
 - (i) the income-tax (the normal tax); and
 - (ii) the secondary tax on companies;
 (hereinafter referred to as "South African tax").

2. The Agreement shall apply also to any identical or substantially similar taxes which are imposed by either Contracting State after the date of signature of the Agreement in addition to, or in place of, the existing taxes. The competent authorities of the Contracting States shall notify each other of any significant changes which have been made in their respective taxation laws.

credited to the account (or with respect to the account) during the calendar year or other appropriate reporting period; and

- (B) the total gross proceeds from the sale or redemption of property paid or credited to the account during the calendar year or other ; appropriate reporting period with respect to which the Reporting Indian Financial Institution acted as a custodian broker, nominee, or otherwise as an agent for the Account Holder:
 - (6) in the ease of any Depository Account, the total gross amount of interest paid or credited to the account during the calendar year or other appropriate reporting period; and
 - (7) in the case of any account not described in subparagraph 2(a)(5) or 2(a)(6) of this Article, the total gross amount paid or credited to the Account Holder with respect to the account during the calendar year or other appropriate reporting period with respect to which the Reporting Indian Financial Institution is the obligor or debtor, including the aggregate amount of any redemption payments made to the Account Holder during the calendar year or other appropriate reporting period.
- (b) In the case of the United States, with respect to each Indian Reportable Account of each Reporting U.S. Financial Institution:
- (1) the name, address, and Indian TIN of any person that is a resident of India and is an Account Holder of the account;
 - (2) the account number (or the functional equivalent in the absence of an account number);
 - (3) the name and identifying number of the Reporting U.S. Financial Institution;
 - (4) the gross amount of interest paid on a Depository Account;
 - (5) the gross amount of U.S. source dividends paid or credited to the account; and

- (6) the gross amount of other U.S. source income paid or credited to the account, to the extent subject to reporting under chapter 3 of subtitle A or chapter 6 of subtitle F of the U.S. Internal Revenue Code.