

**<On the letterhead of Shareholder>**

Date:

To

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Dear Sir/ Madam,

**Re: Declaration for Indian income-tax purpose in relation to dividend declared on shares**

We hereby confirm that:

1. [Name of Shareholder] is a tax resident of [Country Name] in terms of Article [Number] of the Double Tax Avoidance Agreement entered between the Government of [Country Name] and the Government of India ('Tax Treaty').
2. [Name of Shareholder] holds a Tax Residency Certificate ('TRC') bearing reference number [Number] from the [Authority name] of [Country name], confirming its tax residency under the Tax Treaty for [Period] and will continue to maintain "tax resident" status as per his/ her/ its respective Country for the application of the provisions of the Tax Treaty during the FY 2020-21.
3. [Name of Shareholder] is eligible to claim benefits under the provisions of the Tax Treaty.
4. [Name of Shareholder] is the ultimate beneficial owner of its shareholding in the Company and dividend receivable from the Company.
5. [Name of Shareholder] does not and did not at any time have a permanent establishment or taxable presence in India during the FY 2020-21 as provided in the Tax Treaty.
6. [Name of Shareholder] has place of effective management in [Country name] and not in India i.e. all the key management and commercial decisions, which are necessary for the conduct of the business, are in substance made in [Country name].

The arrangement of the [Name of Shareholder] is not covered under impermissible avoidance arrangement as per India domestic law.

We hereby confirm that the above information is true to the best of our knowledge and belief. In case of any change in the facts stated above, we will inform you immediately.

[Name of Shareholder] undertakes to provide any further documentation or information as the Company may request.

Any liability arising on account of misrepresentation of facts by us in the above declaration would be indemnified by us.

For <Shareholder's Name>

Authorised Signatory  
[Name & Designation]

Contact Number:

Contact Address:

Contact E-mail: