

<To be executed on the letterhead of the NR shareholder>

Date:

TO WHOMSOEVER IT MAY CONCERN

I/We, **<NR shareholder name>**, hereby confirm based on existing facts and circumstances the following:

1. I/We are a **<insert legal entity status>** having registered address at **<insert registered address>**.
2. I/We are tax resident of **<name of the country>** in accordance with the provisions of Article 4 of the Double Taxation Avoidance Agreement between India and **<insert country>** (treaty) for corporate tax purposes and are entitled to claim the benefits of the treaty.
3. I/We hereby confirm that I/we have not entered into arrangement or transaction where obtaining benefit under treaty, directly or indirectly was one of the principal purposes or the main purpose of arrangement or transaction. Benefit if at all obtained is in accordance with the object and purpose of treaty.
4. I/We do not have any 'Permanent Establishment' in India as envisaged under Article 5 of the treaty as well as contemplated under Section 92F(iiiia) of the Income-tax Act, 1961, during the period **1 April 2020 to 31 March 2021**.
5. I/We also do not have any business connection and do not carry out any operations in India.
6. I/We hereby confirm that I/we do not have a place of effective management during the period **1 April 2020 to 31 March 2021** in India and none of the key management and commercial decisions for the conduct of business in substance are/ will be made in India.
7. I/We are the beneficial owner of the amounts received/ receivable as per the relevant agreement, pursuant to which, payments are made to us.

I/We hereby certify that declarations made above are true and *bona fide as on the date of issuance of declaration*. In case of any change, I/we undertake to promptly intimate you of the said event.

I/We also undertake to provide all additional documents/ information, as would be prescribed by the Indian Revenue authorities, in order to substantiate declaration stated above.

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

Yours sincerely,

Authorised Signatory