

Business Connection/ Permanent Establishment, Beneficial Ownership and Principal Purpose Test (PPT) Declaration

(On the letterhead of Party)

I, _____ (Name), _____
(Designation) of M/s. _____
having it's national office at

_____ hereby state that :

- a. Legal status of _____ (**Specify the name**) is _____ (**Company, Firm LLP, Corporation, Individual or any other as laws of the Country**), which is registered & incorporated under the laws of _____ (**Specify the Country**) and is resident of _____ (**Specify the Country**) within the meaning of Article ___ of the India - _____ (**Specify the country**) Double Taxation Avoidance Agreement (**Tax Treaty**). Accordingly, I/ We am/ are eligible to claim the benefit of the India - _____ (**Specify the Country**) Tax Treaty as modified by the Multilateral Instrument (MLI); wherever applicable. Self-attested copy of Tax Residency Certificate (**TRC**) valid as on the AGM date obtained from the tax authorities of the Country of which the Shareholder is resident is enclosed along with information contained in Form 10F as prescribed under Rule 21AB(1) of the Income-TAX Rules, 1962.
- b. _____ (**Specify the name**) is the legal and beneficial owner of dividend distributed / paid by **Shalby Limited** (the Company) in respect of _____ shares held bearing Folio No. ___ to ___ .
- c. _____ (**Specify the name**) is a non-resident of India under section 6 of the Income Tax Act, 1961 ("the Act") during the year 1 April 2022 to 31 March 2023.
- d. _____ (**Specify the name**) does not have any business connection in India in terms of section 9(1)(i) of the Act as well as does not carry on business either wholly or partly in the Republic of India through a Permanent Establishment (**PE**) situated therein and / or Fixed base available in India, as defined in the Article ___ of India - _____ (**Specify the Country**) Tax Treaty r.w. relevant provisions of the MLI; wherever applicable and consequently, the question of my / our shareholding in respect of which dividend is paid being effectively connected with such PE in India does not arise;
- e. _____ (**Specify the name**) does not have and will not have a Place of Effective Management in India as per section 6(3)(ii) of the Act during the year 1 April 2022 to 31 March 2023.
- f. _____ (**Specify the name**), Permanent Account Number is _____ (copy attached) or does not have a PAN in India.
- g. It is further declared that obtaining of tax benefit under the Tax treaty entered into between India and _____ (**Specify the country**) is not one of the principal purposes with respect to my / our shareholding in shares of the Company. Accordingly, I / we declare that the "**Principal Purpose Test**" in order to implement tax treaty related measures to prevent base erosion and profit shifting signed by India and _____ (**Specify the country**) as well as other relevant provisions of the **MLI**; wherever applicable are fulfilled.

- h. _____ (**Specify the name**) undertake, to intimate you immediately, if there are any changes in the above at any time during the year.
- i. This declaration is issued to the Company to enable them to decide upon the withholding tax applicable on the dividend income receivable by us/me.
- j. I / We further agree to indemnify the Company for any demand raised and/ or penal consequences initiated against the Company under the provisions of the Income Tax Act, 1961 by income tax authorities as a result of denial of treaty benefit or any act of omission or incorrect information (if any) on my/ our part.

Verification

I. do hereby declare that to the best of my knowledge and belief what is stated above is correct complete and is truly stated.

Verified today the day of.

For (_____) (**Specify the name**)

Signature of the person providing the information

Name_____

Designation_____

Place:

Country: