

THIS COMMUNICATION IS IMPORTANT AND REQUIRES YOUR IMMEDIATE ATTENTION

Dear Member,

We hope this communication finds you safe and in good health. As you may be aware the Board of Directors of the Company at its meeting held on 24th November 2021 has recommended a dividend of ₹ 8/- per equity share of ₹ 2/- each for the Financial Year ended 30th September 2021.

As per the Income-tax Act, 1961 ("Act"), as amended by the Finance Act, 2020, the Company is required to deduct tax at source at the time of payment of the dividend, if declared, at the ensuing Annual General Meeting ("AGM") of the Company. This communication provides a brief of the applicable Tax Deduction at Source ("TDS") provisions under the Act.

Accordingly, in order to enable us to determine the appropriate withholding tax rate applicable, **we request you to provide prescribed details and documents as mentioned below latest by Tuesday, 18th January 2022.**

PAYMENT OF DIVIDEND

The dividend on equity shares for the Financial Year ended 30th September 2021, once declared by the Members of the Company at the ensuing AGM, will be paid after TDS as under:

A. FOR RESIDENT MEMBERS:

Tax is required to be deducted at source under Section 194 of the Act, at 10% on the amount of dividend where Members have registered their valid Permanent Account Number ("PAN"). In case Members do not have PAN / have not registered their valid PAN details in their folio / demat account, TDS at the rate of 20% shall be deducted under Section 206AA of the Act, subject to the following -

i. Resident Individuals:

No tax shall be deducted on the dividend payable to the following Resident Individuals where -

- Total dividend paid is up to ₹ 5,000/- during FY 2021-22.
- In case they provide Form 15G (applicable to any Individual or any person other than a company or a firm) / Form 15H (applicable to an Individual who is of the age of 60 years or more), provided that all the required eligibility conditions are met. The duly filled up signed forms (along with all relevant information) shall be preferably submitted through your e-mail ID. Format of Form 15G and Form 15H are enclosed as **Annexure 1** and **Annexure 2**, respectively. Please note that all fields mentioned in the Form are mandatory and Company may reject the forms submitted, if it does not fulfil the requirement of the Act.

ii. Resident Non-Individuals:

No tax shall be deducted on the dividend payable to the following Resident Non-Individual Members where they provide details and documents as per the format enclosed in **Annexure 3**.

- **Insurance Companies:** Self-declaration that it has full beneficial interest with respect to the equity shares owned by it along with self-attested copy of PAN card.
- **Mutual Funds:** Self-declaration that they are specified in Section 10 (23D) of the Act along with self-attested copy of PAN card and registration certificate.
- **Alternative Investment Fund (AIF):** Self-declaration that its income is exempt under Section 10 (23FBA) of the Act and they are governed by SEBI regulations as Category I or Category II AIF along with self-attested copy of the PAN card and registration certificate.
- **National Pension System Trust:** Declaration along with self-attested copy of documentary evidence supporting the exemption and self-attested copy of PAN card.
- **Other Non-Individual Members:** Self-attested copy of documentary evidence supporting the exemption along with self-attested copy of PAN card.

iii. In case Members (Individuals or Non-Individuals) provide certificate under Section 197 of the Act, for lower / NIL withholding of taxes, the rate specified in the said certificate shall be considered, on submission of self-attested copy of the certificate.

B. FOR NON-RESIDENT MEMBERS [including Foreign Institutional Investors ("FII") and Foreign Portfolio Investors ("FPI")]:

- Taxes are required to be withheld in accordance with the provisions of Section 195 of the Act, as per the applicable rates. As per the relevant provisions of the Act, the TDS shall be at the rate of 20% (plus applicable surcharge and cess) on the amount of dividend payable to Non-Resident Members. **In case Non-Resident Members provide a certificate issued under Section 197/195 of the Act for lower/ Nil withholding of taxes, the rate specified in the said certificate shall be considered, on submission of self-attested copy of the certificate.**
- Further, as per Section 90 of the Act, the Non-Resident Member has the option to be governed by the provisions of the Double Tax Avoidance Treaty ("Tax Treaty") between India and the country of tax residence of the Member. The Non-Resident Members are required to provide the following to avail Tax Treaty benefits:

- Self-attested copy of the PAN Card allotted by the Indian Income Tax authorities.
- Self-attested copy of Tax Residency Certificate ("TRC") (for the period April 2021 to March 2022) obtained from the tax authorities of the country of which the Member is a Resident.
- Self-declaration in Form 10F (format enclosed herewith as **Annexure 4**).
- Self-declaration by the Non-Resident Member of having no Permanent Establishment in India in accordance with the applicable Tax Treaty and Beneficial ownership of the equity shares (for the period April 2021 to March 2022) (format enclosed herewith as **Annexure 5**).
- In case of FII's and FPI's, self-attested copy of SEBI registration certificate.
- In case of shareholder being tax resident of Singapore, please furnish the letter issued by the competent authority or any other evidence demonstrating the non-applicability of Article 24 - Limitation of Relief under India-Singapore Tax Treaty.

Kindly note that the Company is not obligated to apply beneficial Tax Treaty rates at the time of tax deduction / withholding on dividend amounts. Application of beneficial rate of Tax Treaty for the purpose of withholding taxes shall depend upon completeness and satisfactory review by the Company of the documents submitted by the Non-Resident Member. In case the documents are not complete/valid for FY 2021-22, the Company shall deduct tax at the rate of 20% plus applicable surcharge and cess.

C. Section 206AB of the Act

TDS at the rate of 10% under Section 194 of the Act is subject to provisions of Section 206AB of the Act (effective from 01 July 2021) which introduced special provisions for TDS in respect of non-filers of income-tax return. As provided in Section 206AB of the Act, tax is required to be deducted at higher of the following rates in case of payments made to specified persons:

- at twice the rate specified in the relevant provision of the Act; or
- at twice the rate or rates in force; or
- at the rate of 5%.

Where Sections 206AA and 206AB are applicable i.e., the specified person has not submitted the PAN as well as not filed the income-tax return, the tax shall be deducted at the higher of the two rates prescribed in these two sections.

D. FOR MEMBERS HAVING MULTIPLE ACCOUNTS UNDER DIFFERENT STATUS / CATEGORY:

Members holding equity shares under multiple folio / demat accounts having different status / category and single PAN, may note that, higher of the tax as applicable to the status under which equity shares are held under a PAN will be considered on their entire holding in different folio / demat accounts.

SUBMISSION OF TAX RELATED DOCUMENTS:

Members are requested to send the scanned copies of the aforesaid documents at the e-mail ids mentioned below:

Resident Members to send to	Csg-exemptforms2122@tcplindia.co.in
Non-Resident Members to send to	corporate-secretariat.in@siemens.com

These documents should reach us **latest by Tuesday, 18th January 2022** in order to enable the Company to determine and deduct appropriate TDS rate. No communication on the tax determination / deduction shall be entertained post, **Tuesday, 18th January 2022**. It may be further noted that in case the tax on said dividend is deducted at a higher rate in the absence of receipt of the aforementioned details/documents from you, there would still be an option available with you to file the income-tax return and claim an appropriate refund, if eligible.

UPDATION OF PAN / BANK ACCOUNT DETAILS:

Members are requested to ensure that their PAN / bank account details in their respective folio / demat accounts are updated.

We seek your co-operation in the above matters.

Thanking you,
For **Siemens Limited**

Ketan Thaker
Company Secretary
ACS:16250

Date: 17th December 2021

Disclaimer: This communication shall not be treated as an advice on tax matters, from the Company or its Registrar & Share Transfer Agent.

Note: This is a system generated e-mail. Please do not reply to this e-mail.

Name of the Company	DP. ID – Client ID/ Folio No.
SIEMENS LIMITED	

FORM NO. 15G

[See section 197A(1), 197A(1A) and rule 29C]

Declaration under section 197A (1) and section 197A(1A) to be made by an individual or a person (not being a company or firm) claiming certain incomes without deduction of tax.

PART I

Name of Assessee (Declarant)		PAN of the Assessee	
Status	Previous Year (P. Y.) (for which declaration is being made)		Residential Status
	2021-22		
Flat/Door/Block No.	Name of Premise	Road/Street/Lane	Area/Locality
Town/City/District	State	PIN	Email
Telephone No. (with STD Code) and Mobile No.	Whether assessed to tax under the Income-tax Act, 1961		Yes: <input type="checkbox"/> No: <input type="checkbox"/>
	If yes, latest assessment year for which assessed		
Estimated income for which this declaration is made		Estimated total income of the P.Y. in which income mentioned in column 16 to be included	
Details of Form No. 15G other than this form filed during the previous year, if any			
Total No. of Form No. 15G filed		Aggregate amount of income for which Form No.15G filed	

Details of income for which the declaration is filed

Sl. No.	Identification number of relevant investment/account, etc	Nature of income	Section under which tax is deductible	Amount of income
1				
2				
3				
4				
5				
6				
7				

Signature of the Declarant

Declaration/Verification

*I/We _____ do hereby declare that to the best of *my/our knowledge and belief what is stated above is correct, complete and is truly stated. *I/We declare that the incomes referred to in this form are not includible in the total income of any other person under sections 60 to 64 of the Income-tax Act, 1961. *I/We further declare that the tax *on my/our estimated total income including *income/incomes referred to in column 16 *and aggregate amount of *income/incomes referred to in column 18 computed in accordance with the provisions of the Income-tax Act, 1961, for the previous year ending on 31 March 2022 relevant to the assessment year 2022-23 will be nil. * I/We also declare that *my/our *income/incomes referred to in column 16 *and the aggregate amount of *income/incomes referred to in column 18 for the previous year ending on 2021-22 relevant to the assessment year 2022-23 will not exceed the maximum amount which is not chargeable to income-tax.

Place _____

Date _____

Signature

PART II

Name of the person responsible for paying		Unique Identification No.	
PAN of the person responsible for paying	Complete Address	TAN of the person responsible for paying	
Email	Telephone No. (with STD Code) and Mobile	Amount of income paid	
Date on which Declaration is received (DD/MM/YYYY)		Date on which the income has been paid/credited	

Place _____

Date _____

Signature of the person
responsible for paying the income

*Delete whichever is not applicable.

- 1 As per provisions of section 206AA(2), the declaration under section 197A(1) or 197A(1A) shall be invalid if the declarant fails to furnish his valid Permanent Account Number (PAN).
- 2 Declaration can be furnished by an individual under section 197A(1) and a person (other than a company or a firm) under section 197A(1A).
- 3 The financial year to which the income pertains.
- 4 Please mention the residential status as per the provisions of section 6 of the Income-tax Act, 1961.
- 5 Please mention "Yes" if assessed to tax under the provisions of Income-tax Act, 1961 for any of the assessment year out of six assessment years preceding the year in which the declaration is filed.
- 6 Please mention the amount of estimated total income of the previous year for which the declaration is filed including the amount of income for which this declaration is made.
- 7 In case any declaration(s) in Form No. 15G is filed before filing this declaration during the previous year, mention the total number of such Form No. 15G filed along with the aggregate amount of income for which said declaration(s) have been filed.
- 8 Mention the distinctive number of shares, account number of term deposit, recurring deposit, National Savings Schemes, life insurance policy number, employee code, etc.
- 9 Indicate the capacity in which the declaration is furnished on behalf of a HUF, AOP, etc.
- 10 Before signing the declaration/verification, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under section 277 of the Income-tax Act, 1961 and on conviction be punishable-
 - (i) in a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine;
 - (ii) in any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine.
- 11 The person responsible for paying the income referred to in column 16 of Part I shall allot a unique identification number to all the Form No. 15G received by him during a quarter of the financial year and report this reference number along with the particulars prescribed in rule 31A(4)(vii) of the Income-tax Rules, 1962 in the TDS statement furnished for the same quarter. In case the person has also received Form No.15H during the same quarter, please allot separate series of serial number for Form No.15G and Form No.15H.
- 12 The person responsible for paying the income referred to in column 16 of Part I shall not accept the declaration where the amount of income of the nature referred to in sub-section (1) or sub-section (1A) of section 197A or the aggregate of the amounts of such income credited or paid or likely to be credited or paid during the previous year in which such income is to be included exceeds the maximum amount which is not chargeable to tax. For deciding the eligibility, he is required to verify income or the aggregate amount of incomes, as the case may be, reported by the declarant in columns 16 and 18.;

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Name of the Company	DP. ID - Client ID/ Folio No.
SIEMENS LIMITED	

¹FORM NO. 15H

[See section 197A(1C) and rule 29C]

Declaration under section 197A(1C) to be made by an individual who is of the age of sixty years or more claiming certain incomes without deduction of tax.

PART I

1. Name of Assessee (Declarant)		2. Permanent Account Number or Aadhaar Number of the Assessee ¹		3. Date of Birth ² (DD/MM/YYYY)	
4. Previous year(P.Y.) ³ (for which declaration is being made)		5. Flat/Door/Block No.		6. Name of Premises	
2021-22					
7. Road/Street/Lane	8. Area/Locality	9. Town/City/District		10. State	
11. PIN	12. Email	13. Telephone No. (with STD Code) and Mobile No.			
14 (a) Whether assessed to tax ⁴ :				Yes	<input type="checkbox"/>
				No	<input type="checkbox"/>
(b) If yes, latest assessment year for which assessed					
15. Estimated income for which this declaration is made					
16. Estimated total income of the P.Y. in which income mentioned in column 15 to be included ⁵					
17. Details of Form No.15H other than this form filed for the previous year, if any ⁶					
Total No. of Form No.15H filed		Aggregate amount of income for which Form No.15H filed			
18. Details of income for which the declaration is filed					
Sl. No.	Identification number of relevant investment/account, etc. ⁷	Nature of income	Section under which tax is deductible	Amount of income	

.....
Signature of the Declarant

1. Substituted by the IT (Fourteenth Amdt.) Rules, 2015, w.e.f. **1-10-2015**. Earlier Form No. 15H was amended by the IT (Fifth Amdt.) Rules, 1982, w.e.f. 21-6-1982, IT (Fifth Amdt.) Rules, 1989, w.e.f. 1-4-1988, IT (Fourteenth Amdt.) Rules, 1990, w.e.f. 20-11-1990, IT (Twelfth Amdt.) Rules, 1992, w.e.f. 1-6-1992, IT (Seventh Amdt.) Rules, 1995, w.e.f. 1-7-1995, IT (Thirty-second Amdt.) Rules, 1999, w.e.f. 19-11-1999, IT (Twelfth Amdt.) Rules, 2002, w.e.f. 21-6-2002, IT (Eighth Amdt.) Rules, 2003, w.e.f. 9-6-2003, IT (Fourteenth Amdt.) Rules, 2003, w.e.f. 1-8-2003 and IT (Second Amdt.) Rules, 2013, w.e.f. 19-2-2013.

Declaration/Verification⁸

I do hereby declare that I am resident in India within the meaning of section 6 of the Income-tax Act, 1961. I also hereby declare that to the best of my knowledge and belief what is stated above is correct, complete and is truly stated and that the incomes referred to in this form are not includible in the total income of any other person under sections 60 to 64 of the Income-tax Act, 1961. I further declare that the tax on my estimated total income including *income/incomes referred to in column 15 *and aggregate amount of *income/incomes referred to in column 17 computed in accordance with the provisions of the Income-tax Act, 1961, for the previous year ending on 2021-22..... relevant to the assessment year 2022-23..... will be *nil*.

Place:

Date:

.....

Signature of the Declarant

PART II

[To be filled by the person responsible for paying the income referred to in column 15 of Part I]

1. Name of the person responsible for paying		2. Unique Identification No. ⁹	
3. Permanent Account Number or Aadhaar Number of the person responsible for paying	4. Complete Address		5. TAN of the person responsible for paying
6. Email	7. Telephone No. (with STD Code) and Mobile No.		8. Amount of income paid ¹⁰
9. Date on which Declaration is received (DD/MM/YYYY)		10. Date on which the income has been paid/credited (DD/MM/YYYY)	

Place:

Date:

Signature of the person responsible for paying the income referred to in column 15 of Part I

*Delete whichever is not applicable.

1. As per provisions of section 206AA(2), the declaration under section 197A(1C) shall be invalid if the declarant fails to furnish his valid Permanent Account Number or Aadhaar Number.
2. Declaration can be furnished by a resident individual who is of the age of 60 years or more at any time during the previous year.
3. The financial year to which the income pertains.
4. Please mention “Yes” if assessed to tax under the provisions of Income-tax Act, 1961 for any of the assessment year out of six assessment years preceding the year in which the declaration is filed.
5. Please mention the amount of estimated total income of the previous year for which the declaration is filed including the amount of income for which this declaration is made.
6. In case any declaration(s) in Form No. 15H is filed before filing this declaration during the previous year, mention the total number of such Form No. 15H filed along with the aggregate amount of income for which said declaration(s) have been filed.
7. Mention the distinctive number of shares, account number of term deposit, recurring deposit, National Savings Schemes, life insurance policy number, employee code, etc.
8. Before signing the declaration/verification, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under section 277 of the Income-tax Act, 1961 and on conviction be punishable—

- (i) in a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine;
- (ii) in any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine.

9. The person responsible for paying the income referred to in column 15 of Part I shall allot a unique identification number to all the Form No. 15H received by him during a quarter of the financial year and report this reference number along with the particulars prescribed in rule 31A(4)(vii) of the Income-tax Rules, 1962 in the TDS statement furnished for the same quarter. In case the person has also received Form No.15G during the same quarter, please allot separate series of serial number for Form No.15H and Form No.15G.

10. The person responsible for paying the income referred to in column 15 of Part I shall not accept the declaration where the amount of income of the nature referred to in section 197A(1C) or the aggregate of the amounts of such income credited or paid or likely to be credited or paid during the previous year in which such income is to be included exceeds the maximum amount which is not chargeable to tax after allowing for deduction(s) under Chapter VI-A, if any, or set off of loss, if any, under the head “income from house property” for which the declarant is eligible. For deciding the eligibility, he is required to verify income or the aggregate amount of incomes, as the case may be, reported by the declarant in columns 15 and 17.

¹**[Provided that such person shall accept the declaration in a case where income of the assessee, who is eligible for rebate of income-tax under section 87A, is higher than the income for which declaration can be accepted as per this note, but his tax liability shall be nil after taking into account the rebate available to him under the said section 87A.]**

1. Inserted by Income-tax (4th Amendment) Rules, 2019, w.e.f. **22-5-2019**.

Date:

To
Siemens Limited
Birla Aurora, Level 21, Plot No. 1080,
Dr. Annie Besant Road, Worli,
Mumbai – 400030, India

Subject: Declaration regarding Category and Beneficial Ownership of equity shares

Ref: PAN – Mention PAN of Member

Folio Number / DP ID/ Client ID – Mention all the account details

With reference to the captioned subject and in relation to the appropriate withholding of taxes on the Dividend payable to me / us by **SIEMENS LIMITED** (“the Company”), I / We hereby declare as under:

1. I / We, full name of the Member _____, holding equity share(s) of the Company as on the record date, hereby declare that I am /we are tax resident of India for the period April 2021-March 2022 (Indian Fiscal Year).
2. We hereby declare that (Select Applicable)
 - ☐ We are **Insurance Company** and are the beneficial owner of the equity share(s) held in the Company; and we are submitting self-attested copy of PAN Card.
 - ☐ We are **Mutual Fund** specified in Section 10(23D) of the Income-tax Act, 1961 (‘Act’) and are the beneficial owner of the equity share(s) held in the Company; and we are submitting self-attested copy of PAN Card and registration certificate.
 - ☐ We are **Alternative Investment fund** established in India and are the beneficial owner of the equity share(s) held in the Company; and our income is exempt under Section 10(23FBA) of the Act and are governed by SEBI regulations as Category I or Category II AIF; and we are submitting self-attested copy of the PAN card and registration certificate.
 - ☐ We are **category of the entity** and are the beneficial owner of the equity share(s) held in the Company; and are not subject to withholding tax under Section 196 of the Act and we are submitting self-attested copy of the documentary evidence supporting the exemption status along with self-attested copy of PAN card.
3. I/ We further indemnify the Company for any consequences arising out of any acts of commission or omission initiated by the Company by relying on my/ our above averment.
4. I/We hereby confirm that the above declaration should be considered to be applicable for all the equity share(s) held in the Company under PAN/ accounts declared in the form.

Thanking you.

Yours faithfully,

For Name of the Member

<<insert signature>>

Authorized Signatory

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Name of the Company	DP. ID – Client ID/ Folio No.
SIEMENS LIMITED	

FORM NO. 10F

[See sub-rule (1) of rule 21AB]

**Information to be provided under sub-section (5) of section 90 or
sub-section (5) of section 90A of the Income-tax Act, 1961**

I *son/daughter of Shri in the capacity of (designation) do provide the following information, relevant to the previous year 2021-22 *in my case/in the case of for the purposes of sub-section (5) of *section 90/section 90A:—

<i>Sl.No.</i>	<i>Nature of information</i>	<i>:</i>	<i>Details #</i>
(i)	Status (individual, company, firm etc.) of the assessee	:	
(ii)	Permanent Account Number or Aadhaar Number of the assessee if allotted	:	
(iii)	Nationality (in the case of an individual) or Country or specified territory of incorporation or registration (in the case of others)	:	
(iv)	Assessee's tax identification number in the country or specified territory of residence and if there is no such number, then, a unique number on the basis of which the person is identified by the Government of the country or the specified territory of which the assessee claims to be a resident	:	
(v)	Period for which the residential status as mentioned in the certificate referred to in sub-section (4) of section 90 or sub-section (4) of section 90A is applicable	:	2021-22
(vi)	Address of the assessee in the country or territory outside India during the period for which the certificate, mentioned in (v) above, is applicable	:	

2. I have obtained a certificate referred to in sub-section (4) of section 90 or sub-section (4) of section 90A from the Government of (name of country or specified territory outside India)

Signature:

Name:

Address:

Permanent Account Number or Aadhaar Number

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.....

.....

Signature of the person providing the information

Place:

Notes :

1. *Delete whichever is not applicable.

2. #Write N.A. if the relevant information forms part of the certificate referred to in sub-section (4) of section 90 or sub-section (4) of section 90A.

Date:

To
Siemens Limited
Birla Aurora, Level 21, Plot No. 1080,
Dr. Annie Besant Road, Worli,
Mumbai – 400030, India

Subject: Declaration regarding Tax Residency and Beneficial Ownership of shares

Ref: PAN – Mention PAN of Shareholder

Folio Number / DP ID/ Client ID – Mention all the account details

With reference to the captioned subject, and in relation to the appropriate withholding of taxes on the Dividend payable to me / us by **Siemens Limited** (the Company), I / We hereby declare as under:

1. I / We, Full name of the Member _____, holding share/shares of the Company as on the record date, hereby declare that I am /we are tax resident of (Country name) for the period April 2021-March 2022 (Indian Fiscal Year) as per Tax Treaty between India and (Country name) (hereinafter referred to as Tax Treaty’).
2. I / We hereby declare that I am /we are the beneficial owner of the share/shares held in the Company as well as the dividend arising from such shareholding, and I/ we have the right to use and enjoy the dividend received/ receivable from the above shares and such right is not constrained by any contractual and/ or legal obligation to pass on such dividend to another person.
3. I/We confirm that I/We are entitled to claim the benefits under the Tax Treaty as modified by the multilateral convention to implement Tax Treaty related measures to prevent base erosion and profit shifting (“MLI”) including but not limited to the Principal Purpose Test (“PPT”), limitation of benefit clause (“LOB”), Simplified Limitation of Benefits (“SLOB”), period of holding of shares etc. as applicable. I / We specifically confirm that my / our affairs were not arranged such that the main purpose or the principal purpose thereof was to obtain tax benefits available under the applicable Tax Treaty.
4. I/We confirm that I/We have not entered into an impermissible avoidance arrangement i.e., an arrangement, the main purpose or one of the main purposes of which is to obtain a tax benefit and it -
 - a. creates rights, or obligations, which are not ordinarily created between persons dealing at arm’s length.
 - b. results, directly or indirectly, in the misuse, or abuse, of the provisions of this Income-tax Act, 1961 (“Act”).
 - c. lacks commercial substance or is deemed to lack commercial substance under Section 97 of the Act, in whole or in part; or
 - d. is entered into, or carried out, by means, or in a manner, which are not ordinarily employed for bona fide purposes.
5. I/We hereby furnish a copy of valid Tax Residency Certificate dated _____ having Tax Identification number _____ issued by _____ along with a copy of Form 10F duly filled and signed for the period April 2021-March 2022.
6. I/We further declare that I/we do not have and will not have any taxable presence, fixed base or Permanent Establishment (“PE”) in India as per the said Tax Treaty during the period April 2021 – March 2022.

7. If, I /We have any PE or fixed base in India as construed under relevant Articles of the applicable Tax Treaty but the dividend income receivable by me/us from investment in the shares of the Company is not effectively connected to said PE in India. Further I/We hereby declare and confirm that I/We do not fall under the definition of 'specified person' as provided in Section 206AB of the Act.
8. I/ We further indemnify the Company for any penal consequences arising out of any acts of commission or omission initiated by the Company by relying on my/ our above averment.
9. I/We hereby confirm that the above declaration should be considered to be applicable for all the shares held in the Company under PAN/ accounts declared in the form.

The shareholders are required to provide a Declaration strictly as per the specified format given above, failing which the Company reserves the right to deny the Tax Treaty benefits.

Thanking you.

Yours faithfully,

For Name of the Member

<<insert signature>>

Authorized Signatory - Name and designation

Contact address: _____ [Please insert]

Email address: _____ [Please insert]

Contact Number: _____ [Please insert]

Tax Identification Number _____ [Please insert]

Note: Kindly strikethrough whichever is not applicable

(*In case of any Authorized Signatory being other than Director/ Managing Director, please attach the valid Power of Attorney authorizing the individual as an Authorized Signatory)

The shareholders are required to provide a Declaration strictly as per the specified format given above, failing which the Company reserves the right to deny the Tax Treaty benefits.