

<Company's letter head>

Date:

GRP Limited

510 A, Kohinoor City C-1 ,Kiorl Road,
Off L.B.S Marg, Kurla(W), Mumbai, Maharashtra-400070

Folio No: _____

This is to certify that

1. _____ (Insert company's name), is a body corporate incorporated and registered in _____ (Name of the country) under the laws of _____ (Mention name of the country).
2. We, _____ (Name of the shareholder) confirm that we are a tax resident of _____ (Insert country) and are eligible to claim benefits of the India - _____ (Insert country) Double Tax Avoidance Agreement (DTAA), read with the provisions laid down in Multilateral Instrument (MLI), wherever applicable.
3. Our Tax Identification Number issued by _____ (Name of the authority) is _____ (mention number).
4. We do not qualify as a 'resident' of India under section 6 of the Indian Income-tax Act, 2025 ("Act") for the period April 01, 2026 to March 31, 2027.
5. We do not have a place of effective management in India as per Section 6(10) of the Act for the period April 01, 2026 to March 31, 2027.
6. We do not have any office or other fixed place of business in India as envisaged in Article (mention relevant article no of the applicable Tax Treaty) of Double Taxation Avoidance Agreement ("Tax Treaty") for the period April 01, 2026 to March 31, 2027.
7. We declare that, if the Tax Residency Certificate does not specifically provide the year for which I / We are tax resident of _____ (name of the country), then the declaration provided by me / us in Form 41 can be considered as the period for which I / We are tax resident of _____ (name of the country).
8. We undertake the responsibility to provide all the required documents and information including but not limited to beneficial ownership, substance of establishing our entity in _____ jurisdiction etc to prove our tax residential status for the Tax Year ("TY") 2026-2027.
9. We understand that Mindteck (India) Limited will determine the final withholding tax rate based on various factors including the applicability of tax treaty benefits, if any based on the documents submitted by us. We agree to accept the withholding tax rate determined by Mindteck (India) Limited and undertake not to claim any refund or seek recovery of tax deducted on the dividend received.
10. We do not have any dependent agent performing activities in India as envisaged in Article (mention relevant article no of the applicable Tax Treaty) of Tax Treaty which may constitute a dependent agency Permanent Establishment for us in India in terms thereof for the period April 01, 2026 to March 31, 2027;
11. We, _____ (Name of the shareholder) are the beneficial owner

of the shares allotted in above folio no. as well as of the dividend arising from such shareholding.

12. I/ We further declare that 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.
13. We either do not have a Permanent Establishment (P.E.) in India or Dividend income earned by us is not attributable/effectively connected to the our P.E. in India as defined under the Act and DTAA between India and _____ (Name of Country) read with the provisions laid down in Multilateral Instruments (MLI), wherever applicable, during the TY _____ (Year). We further confirm that we do not have any business connection in India as per provisions of the Act. In the event of we have a P.E. in India or Dividend income is attributable/ effectively connected to such P.E., we acknowledge our obligation to inform you forthwith with necessary details.
14. We confirm that we satisfy the conditions prescribed under the Limitation of Benefit clause under India- _____ (Insert country) treaty.

We further indemnify GRP Limited for any penal consequences arising out of any acts of commission or omission initiated by GRP Limited by relying on our above averment.

Thanking you,

Yours Sincerely,

For <company's name>

Name: <insert authorised person name>

<Insert designation>