

Date:

GRP Limited

510, A WING, KOHINOOR CITY
COMMERCIAL I, KIROL ROAD, OFF
LBS MARG, KURLA WEST, Mumbai
City, MUMBAI, Maharashtra, India,
400070.

Folio No: _____

This is to certify that

1. I, _____ (Name of the shareholder) confirm that I am 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.
2. My Tax Identification Number issued by _____ (Name of the authority) is _____ (Mention number).
3. I 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.
4. I 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.
5. I 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.
6. I declare that, if the Tax Residency Certificate does not specifically provide the year for which I am 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 am tax resident of _____ (name of the country).
7. I undertake the responsibility to provide all the required documents and information including but not limited to beneficial ownership etc to prove our tax residential status for the Tax Year ("TY") 2026-2027.
8. I 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 me. 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.
9. I 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 me in India in terms thereof for the period April 01, 2026 to March 31, 2027;

10. I am beneficial owner of the shares allotted in above folio no. as well as of the dividend arising from such shareholding.
11. I further declare that I 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.
12. I do not have a Permanent Establishment (P.E.) or any fixed base 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). I further confirm that I do not have any business connection in India as per provisions of the Act. In the event of I would have a P.E. or fixed base in India or Dividend income is attributable/ effectively connected to such P.E., I acknowledge my obligation to inform you forthwith with necessary details.
13. I confirm that I satisfy the conditions prescribed under the Limitation of Benefit clause under India- _____ (Insert country) treaty.

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

Thanking you,

Yours Sincerely,

Name: