

(On the letter head or plain paper of the non-resident shareholder)

Date:

**Parag Milk Foods Limited**

**Flat No.1, Plot No - 19,**

**Nav Rajasthan CHS.,**

**Shivaji Nagar,**

**Pune – 411 016.**

**Re: Self Declaration for claiming the tax treaty benefits for the financial year 2020-21 (01/04/2020 to 31/03/2021)**

This is to confirm that:

- a) (Name of the Non-Resident shareholder) is an individual.
- b) (Name of the Non-Resident shareholder) is Firm/ Company/ Other entity (please specify) registered and incorporated under the laws of the (Name of the country).
- c) (Name of the Non-Resident shareholder) is a “resident” of the (Name of the foreign country) liable to tax therein as defined in Article 4 of the Double Tax Avoidance Agreement (“DTAA”) between the Government of the Republic of India and the Government of the (Name of the foreign country).
- d) (Name of the Non-resident shareholder) does not have a “permanent establishment” in India as defined in Article 5 of the said DTAA.
- e) (Name of the Non-resident shareholder) is a non-resident of India under section 6 of the Income Tax Act, 1961 (“the Act”) during the year April 1, 2020 to March 31, 2021.
- f) (Name of the Non-resident shareholder) 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 April 1, 2020 to March 31, 2021.
- g) (Name of the Non-resident shareholder) does not have any business connection in India as per Section 9(1) of the Act through which the business is carried on in India or permanent establishment in India.
- h) (Name of the Non- resident shareholder) is the beneficial owner of shares held in the Company. Further, (Name of the Non-resident shareholder) is the beneficial owner of dividend receivable from the Company in relation to aforementioned shares;
- i) We do / do not have PAN in India. Our PAN Number in India is \_\_\_\_\_(Copy of the PAN Card should be attached)
- j) We further affirm that (applicable in case of non-residents other than individuals):

- The construct and affairs of \_\_\_\_\_ <insert name of shareholder> are not arranged with the principal or one of the principal purposes of obtaining any tax benefits, directly or indirectly, under the Income Tax Act, 1961 or DTAA; or
- Objective parameters laid out in the DTAA such as listing, ownership, activity etc. are fulfilled by me/ us to be regarded as qualified person for entitlement of DTAA; or
- We are not fiscally transparent entities and shall qualify as 'resident' of \_\_\_\_\_ <<insert name of country of tax residence>> as per India- \_\_\_\_\_ <<insert name of country of tax residence>> DTAA; or
- The claim of benefits by us under the DTAA is not impaired in any way.

k) I / We have the right to use and enjoy the dividend received / receivable from the shares held by us in **PARAG MILK FOODS LIMITED** and such right is not constrained by any contractual and / or legal obligation to pass on such dividend to another person

l) Lower / Nil rate of tax applies to me / us as I / we have obtained a lower / nil deduction certificate from my / our jurisdictional tax officer in relation to the dividend income from **PARAG MILK FOODS LIMITED**.

m) I/ We confirm that we shall file the income tax return in India disclosing the dividend income received from **PARAG MILK FOODS LIMITED** in compliance with the provisions of Indian Income Tax Act, 1961

n) We, \_\_\_\_\_ <<insert name of shareholder>>, Foreign Portfolio Investor/ Foreign Institutional Investor registered with SEBI having registration number as <insert SEBI Registration Number>.

\* Strike out whichever is not applicable

I/We also undertake, to intimate you immediately, if there are any changes in the above at any time during the year.

I/We hereby confirm that the declarations made above are complete, true and bona fide. 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.

For (Name of the non-resident entity)

(Name)

(Designation)

Date:

Place: