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Declaration

Date:

To,

Kirloskar Pneumatic Company Limited
Hadapsar Industrial Estate
Pune – 411 013
Maharashtra

Sir / Madam,

Re: Self declaration for Financial Year (FY) 2022-23 of Indian Income-tax Act, 1961 to take tax treaty benefits in relation to receipt of dividend income from Kirloskar Pneumatic Company Limited

With reference to the above referred subject matter I / We hereby declare as under:

I/We, _____ (Complete name of the shareholder) having Permanent Account Number (PAN) under the Indian Income-tax Act, 1961 ('the Act') _____ (Please mention PAN) and holding _____ (Please mention number of shares held) number of shares of the Company as on the record date. I/We am/are tax resident and will continue to remain tax resident of _____ (please mention name the Country) for the financial year 2022-23. A copy of the valid tax residency certificate for the applicable period is attached herewith.

I/We am/are tax resident of the _____ (Please mention Name of the country) as defined under Article _____ of the tax treaty between India and _____ (name of the country for applicable tax treaty). I/We am/are eligible to be governed by the provisions of the applicable tax treaty and meet all the necessary conditions to avail the benefits under the applicable tax treaty.

I/We am/are eligible to claim the beneficial tax treaty rate between India and _____ (name of the country for applicable tax treaty) for the purposes of tax withholding on dividend declared by the Company. We have no reason to believe that our claim for benefits under the tax treaty between India and _____ (name of the country for applicable tax treaty) is impaired in any manner.

As required to claim the benefits of the lower tax rate under the applicable tax treaty in relation to the dividend income to be received by me/us from the Company, I/We specifically confirm that I am/We

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are the ultimate beneficial owner of the above referred equity shares of the Company and the dividend income receivable from the Company in relation to the said shares

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.

I/We am/are the legal and ultimate beneficial owner of the dividend income to be received from the Company.

I/We do not have any Permanent Establishment ('PE') or fixed base in India as construed under relevant Articles of the applicable tax treaty nor do we have any PE or business connection in India as construed under the relevant provisions of the Act. Further, I/We do not have a Business Connection in India according to the provisions of the Act and the amounts paid/payable to us, in any case, are not attributable to business operations, if any, carried out in India.

I/We specifically confirm that my/our affairs/affairs of _____ (Complete name of the shareholder) were not arranged such that one of the main purpose or the principal purpose thereof was to obtain tax benefit available under the applicable tax treaty.

Further, our claim for relief under the tax treaty is not restricted by application of Limitation of Benefit clause, if any, thereunder.

_____ [NAME OF SHAREHOLDER] will immediately inform the Company if there is any change in the above circumstances.

This declaration is valid for the period 1st April, 2022 to 31st March, 2023.

*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 _____ [NAME OF SHAREHOLDER]. I/We shall be solely responsible for any adverse income-tax consideration that may arise in India on the dividend income to be received from the Company.

Yours faithfully,

For _____ [NAME OF SHAREHOLDER]

Authorized Signatory _____ [Name/designation]

Dp. Id – Client Id/ Folio No.: _____

Contact address: _____ [Please insert]

Email address: _____ [Please insert]

Contact Number: _____ [Please insert]

Signature: _____