

**DECLARATION FOR NON-RESIDENT SHAREHOLDERS**

*(To be declared by non-resident shareholder for availing the benefits of lower tax deduction under Section 90 of the Indian Income Tax Act, 1961 ('Act') read with the provisions of the Tax Treaty with India and the Multilateral Instrument)*

Date: \_\_\_\_\_

To

Aster DM Healthcare Limited,

**Subject: Self declaration for Financial Year (FY) 2024-25 of Indian Income Tax Act to take tax treaty benefits in relation to receipt of dividend income from Aster DM Healthcare Limited**

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I / We, [.....] do hereby solemnly declare as follows:

- i. I / We, am / are a resident of [name of country of which shareholder is tax resident] during the year 2024-25. I / We am / are eligible to be governed by the provisions of the tax treaty between India and [name of country of which the shareholder is tax resident] and meet all the necessary conditions to avail the benefits under the said tax treaty. The claim of benefits by me / us under the said tax treaty is not impaired in any way;
- ii. I / We, will continue to maintain the 'tax resident' status in \*his/her/its respective Country for the application of the provisions of the India-[COUNTRY OF RESIDENCE] DTAA, during the financial year 2024-25;
- iii. As required to claim the benefits of the lower tax rate under the applicable tax treaty read with the provisions laid down in Multilateral Instruments, wherever applicable, in relation to the dividend income to be received by me/us from the Company, I/We specifically confirm that I/We am/are the 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
- iv. I/We do not have any Permanent Establishment ('PE') or fixed base in India as construed under relevant Articles of the applicable tax treaty read with the provisions laid down in Multilateral Instruments, wherever applicable, 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 provision of Section 9(1)(i) 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
- v. We hereby confirm that we do not have a place of effective management during the financial year 1st April 2024 to 31st March 2025 in India and none of the key management and commercial decisions for the conduct of business in substance are made in India

*[To be provided on Shareholder's Letter head]*

- vi. That the investments made by me / us in the shares of Aster DM Healthcare Limited are not arranged in a manner which results in obtaining a tax benefit, whether directly or indirectly, as one of its principal purposes. The tax benefit, if any, derived from such investments would be in accordance with the object and purpose of the relevant provisions of the tax treaty between India and *[name of country of which the shareholder is tax resident]*
- vii. 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 Act (c) lacks commercial substance or is deemed to lack commercial substance under section 97, 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
- viii. \*I am / We are the beneficial owner of the investments made by me/us in the shares of Aster DM Healthcare Limited and also any income receivable from such investments, for a period of less than 365 days.

**OR**

\*I am / We are the beneficial owner of the investments made by me/us in the shares of Aster DM Healthcare Limited and also any income receivable from such investments, for an uninterrupted period of 365 days or more including the date of payment of the dividends.

**OR**

\*I am / We are the beneficial owner of the investments made by me/us in the shares of Aster DM Healthcare Limited and also any income receivable from such investments, for a period of more than '.....' days *[required period of days under the relevant Double Taxation Avoidance Agreement]*.

- ix. 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.
- x. I / We further declare that I / We are eligible to claim benefit of the tax treaty between India and *[Name of the Country of residence of shareholder]* including satisfaction of the Limitation of Benefits clause (wherever applicable).
- xi. I / We undertake to intimate Aster DM Healthcare Limited immediately in case of any alteration in the aforesaid declaration.
- xii. I, [.....], hereby declare that the contents above are correct, complete and truly stated.

*[To be provided on Shareholder's Letter head]*

- xiii. I / We will indemnify and hold harmless the Company for any tax, interest, penalty or related cost that the Company may incur due to non-withholding or withholding of tax at lower rate arising out of any acts of commission or omission initiated by the Company by relying on my/ our above averment.

(Name, designation & signature of Non-resident Shareholder)

Company Seal (if applicable)

Date: .....

Place: .....

Address: .....

Email and Telephone:.....

PAN/Tax identification number (country of residence):.....

***Notes:***

1. \*Delete whichever is not applicable.