Annexure 4

Letter in case a Foreign Company does not have a "PE" in India

Date:

To
Continental Securities Limited
301,Metro plaza, Gopalbari
Jaipur , Rajasthan 302001

Dear Sir/ Ma'am

Folio No./ DP.Id – Client Id:

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 taxpayer identification number / unique number in <<COR>> is _____.

4. Our tax residency certificate number is _____ and copy of our certificate of tax residency/document evidencing country of residency for the period ____ to _____is enclosed herewith.

5. 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.

6. 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.

7. We either do not have a Permanent Establishment (P.E.) in India or Dividend income earned by us in not attributable/effectively connected to our P.E. in India as defined under the Income-tax Act, 2025 and DTAA between India and <Name of Country> read with the provisions laid down in Multilateral Instruments (MLI), wherever applicable, during the financial year <<<Year>>>. We further confirm that we do not have any business connection in India as per provisions of Income-tax Act 2025. In the event of we having 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.

8. I/We specifically confirm that my affairs/affairs of <<full name of the shareholder>> were not arranged such that the main purpose or the principal purpose thereof was to obtain tax benefits available under the applicable tax treaty read with respective MLI, as applicable.

9. We hereby declare that no arrangement / transaction has been undertaken for the purpose of obtaining any benefits under the DTAA which results into non-taxation or reduced taxation through tax evasion or tax avoidance (including treaty shopping arrangements) or any other means and that the provisions of GAAR and anti-avoidance provisions as prescribed under the DTAA between India and <<COR>> are satisfied.

10. Our claim for relief under the tax treaty/MLI is not restricted by application of Limitation of Benefit clause, if any, thereunder.

11. We confirm that the above declaration is true and correct and is applicable for Tax Year 2026-27.

12. We <Name of the company> further indemnify for any penal consequences arising out of any acts of commission or omission initiated by Continental Securities Limited by relying on our above averment.

Thanking you,

Yours Sincerely,

For <company's name>

_____

Name: <Insert Authorised person name>

< Insert designation>