

<<Draft to be executed on the letterhead of the Non-resident person>>

<<Date>>

To,
Sun Pharmaceutical Industries Limited,
(Address of the payer)

Re.: Folio Number: _____
Sub.: Declaration

I/ We hereby declare, certify and confirm the following:

1. _____ <<Name of the Shareholder>>, is a _____ incorporated / established in _____ <<Name of the Country>> having registered office at _____ <<Address of the Payee>>.
2. I/ We confirm that I am/ we are a 'person' as covered under Article 3 of the Double Taxation Avoidance Agreement entered between India and _____ <<Name of the Country>> ('the India ___ <<Name of country>> Tax Treaty').
3. I/ We confirm that I am/ we are a Resident of _____ <<Name of the Country>> within the meaning of Article 4 of the India ___ <<Name of the Country>> Tax Treaty. I/ We hereby furnish a copy of Tax Residency Certificate ('TRC') [dated _____, Taxpayer Identification Number: _____] issued by the _____ <<Relevant tax authority>> confirming the same.
4. I/ We confirm that we do not/ will not have a Place of effective management (POEM) during the period 1st April 2022 to 31st March 2023 in India. In the event of me/ us having a POEM in India, I/ we acknowledge my/ our obligation to inform you forthwith with necessary details.
5. We confirm that we are entitled to claim benefits under the India ___ <<Name of the Country>> Tax Treaty as modified by the Multilateral Instrument ('MLI') and that all its relevant provisions of the MLI are fulfilled including the "Principal Purpose Test".
6. I / We specifically confirm that my affairs / affairs of <<full name of the shareholder>> were arranged such that the main purpose or the principal purpose thereof was not to obtain tax benefits available under the India ___ <<Name of country>> Tax Treaty.
7. We further confirm that we neither have nor foresee to have a Permanent Establishment (PE) in India during the period commencing from April 1, 2022 up to March 31, 2023, as per the provisions of the India ___ <<Name of the Country>> Tax Treaty. In the event of me/ us having a PE or fixed base in India, I/ we acknowledge my/ our obligation to inform you forthwith with necessary details.
8. I/ We confirm that I am/ we are the beneficial owner of the shares allotted in above folio number as well as of the dividend arising from such shareholding.
9. Our Permanent Account Number (PAN) is _____ (provide if obtained in India).
10. Our e-mail id is _____ and contact number is _____.

11. We have been informed that section 90(5) of the Indian Income-tax Act,1961 provides that a taxpayer to whom a tax treaty applies shall provide such other documents and information, as may be prescribed for the purposes of claiming relief under the tax treaty. We understand that where the required information¹ is not explicitly mentioned in the TRC, we shall be required to furnish a self-declaration in Form No. 10F and keep and maintain such documents as are necessary to substantiate the information provided. We wish to confirm that the TRC issued to us contains all the required information.
12. We hereby certify that the declarations made above are true and bona fide. In case there is any change to any of the confirmations provided, we shall inform you immediately.
13. Further, we confirm that any loss/ tax cost (including interest and penalty) arising to Sun Pharmaceutical Industries Limited due to denial of Treaty benefit to _____ <<name of payee>> will be borne by/ indemnified by _____ <<name of payee>>.

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

I / We confirm that the above is true to the best of my/ our knowledge and 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 Sun Pharmaceutical Industries Limited.

For _____ (payee)

Authorised Signatory

¹ - Status (individual, company, firm etc.) of the taxpayer;
- Nationality (in case of an individual) or country or specified territory of incorporation or registration (in case of others);
- Taxpayer's tax identification number in the country or specified territory of residence (In case there is no such number, then, a unique number on the basis of which the person is identified by the Government of the country or the specified territory of which the taxpayer claims to be a resident);
- Period for which the residential status, as mentioned in the TRC is applicable; and
- Address of the taxpayer in the country or specified territory outside India, during the period for which the certificate is applicable.