Date

To

## **Modison Limited**

33, Nariman Bhavan, 227, Nariman Point, Mumbai 400021, Maharashtra, India

Dear Sir/Madam,

## **Subject: Certification with regard to Payment**

For the purpose of determination of tax liability u/s. 195 of the [Indian] Income-tax Act, 1961, (including information required as per Rule 37BC of the Income Tax Rules, 1962), I/We hereby certify that-

Nature of information	Details
Name of the Shareholder	
Folio No	
Address in the country of residence	
Email Id	
Contact No	
Status	Company / LLP / Partnership / Trust / Individual
Tax identification number in the	
country of residence	

- (i) I/We, << Name of the shareholder >> confirm that I/We are a tax resident of <<Insert country>> and are eligible to claim benefits of the India << Insert country>> Double Tax Avoidance Agreement (DTAA/Tax treaty), read with the provisions laid down in Multilateral Instrument (MLI), wherever applicable.
- (ii) I/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.
- (iii)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.
- (iv) I/We either do not have a Permanent Establishment (P.E.) in India or Dividend income earned by us is not attributable/effectively connected to the our P.E. in India as defined under the Income Tax Act, 1961 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>>>. In the event of I/We having a P.E. in India or Dividend income is attributable/effectively connected to such P.E., I/We acknowledge our obligation to inform you forthwith with necessary details

## ON THE LETTERHEAD OF SHAREHOLDER

- (v) I/We hereby declare that the investments made by me/us in the shares of Modison Limited are not arranged in a manner which results in obtaining a tax benefit, derived from such investments would be in accordance with the object and purpose of the relevant provisions of the Double Taxation Avoidance Agreement between India and [......Insert name of country of which the shareholder is tax resident]
- (vi) 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).

I/We further agree to indemnify Modison Limited for any penal consequences arising out of any acts of commission or omission initiated by << Name of the Shareholder>> by relying on our above averment.

Thanking you,
Yours Sincerely,
For <Name of the Shareholder>

Name: <insert authorised person name> <Insert designation>