

(Declaration by Non-resident – Entity / Company)

(on the Letterhead of Entity)

Date _____

To,
Company Secretary
EPL Limited
Top Floor, Times Tower, Kamala City, Senapati Bapat Marg
Lower Parel. Mumbai 400013, India

Sub: Declaration and details for claiming lower withholding tax deduction from payment of Dividend, under Double Taxation Avoidance Agreement (DTAA)

Ref: Folio /DP and Client ID: _____

1 _____ (entity name) (hereinafter referred to as the Shareholder or We) is a body corporate incorporated and registered in _____ (Name of the country) under the laws of _____ (mention Name of the country).

2 We are a shareholder of EPL Limited hereby 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 Tax Identification Number issued by _____ (Name of the authority) is _____ (mention number).

4 We are the beneficial owner of the shares being hold under above mentioned folio or demat account number as well as of the dividend arising from such shareholding

5 We further declare that 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.

6 We neither have a Permanent Establishment (PE) in India nor Dividend income earned by us attributable/effectively connected to our PE 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 __. We further confirm that we do not have any business connection in India as per provisions of Income Tax Act 1961. In the event of we having a PE in India or Dividend income is attributable/effectively connected to such PE, and change in details provide to you, we acknowledge our obligation to inform you forthwith with necessary details.

We undertake to intimate EPL Limited immediately in case of any alteration in the aforesaid declaration and details including change in tax residential status etc.

We understand that based on the details, form etc submitted by us, the Company will decide the rate of withholding tax as per DTAA or such rate as per Indian Income Tax Act, as it think most relevant or appropriate. We hereby declare that the contents above are correct and complete.

Yours Sincerely,

Sign:

Name:

Designation:

(Authorised vide Board Resolution/power of attorney dated _____)

Note: This Declaration and details is submitted along with the Form 10.