

On the letterhead of the Non-resident Entity. In case of Individuals letterhead is not required if not there.

**TO WHOMSOEVER IT MAY CONCERN**

This is to certify that:

1. \_\_\_\_\_ << **Name of the Entity / Individual**>> is **individual/HUF/LLP/Partnership firm/Company/Trust (strike off whichever is not applicable)** and have my / our principal place of business at \_\_\_\_\_.<<**address to be inserted**>> in \_\_\_\_\_<<**Country name**>>.
2. **I/We** have a PAN in India \_\_\_\_\_<< **PAN to be mentioned**>> **OR**  
**I/We** do not have a PAN in India. **(strike off whichever is not applicable).**
3. \_\_\_\_\_<< **Name of the Entity / Individual**>> is a tax resident of \_\_\_\_\_<<**Country name**>> under Tax Identification number \_\_\_\_\_<<**Tax Identification Number to be included**>> in accordance with the provisions of the Double Taxation Avoidance Agreement (herein after referred as "DTAA") / Covered Tax Agreement (herein after referred as "CTA") entered into between India and the \_\_\_\_\_<<**Country name**>> for income tax purposes and I/we am / are entitled to claim the benefits of the DTAA / CTA.
4. I / We hereby confirm that I / We have not entered into arrangement or transaction where obtaining benefit under DTAA / CTA, directly or indirectly was one of the principal purposes or main purpose of arrangement or transaction. Benefit if at all obtained is in accordance with the object and purpose of DTAA / CTA.
5. \_\_\_\_\_<< **Name of the Entity** >> does / will not have a place of effective management as defined in Section 6(3) of the Indian Income-Tax Act, 1961 at any time in India during the period 1 April 2023 to 31 March 2024 and none of the key management and commercial decisions for the conduct of business in substance are/will be made in India. Accordingly, the Company is not a Resident in India as defined in section 6 of the Indian Income Tax Act, 1961. **[Not applicable to Individuals].**
6. I / We do not have a Permanent Establishment in India as defined in the DTAA / CTA for the period 1 April 2023 to 31 March 2024. Also, I / We confirm that we have not resorted to any means for avoidance of Permanent Establishment Status as referred in Part IV of the Multi-Lateral Convention to implement tax treaty related measures to prevent base erosion and profit shifting of which India is a Signatory.
7. I / We am / are the beneficial owner of the amounts received / receivable as per the relevant DTAA / CTA, pursuant to which, payments are made to me / us.
8. I / We do not have a fixed base in India and my / our stay in India does not exceed the aggregate number of days as envisaged under Independent Personnel Services Article of the DTAA / CTA during the period 1 April 2023 to 31 March 2024.
9. The income embedded in the payment to be made by the Payer is not derived from / attributable to any Permanent Establishment / fixed base of \_\_\_\_\_<< **Name of the Entity / Individual**>> in India in terms of the provisions of Indian Income-Tax Act, 1961 / DTAA / CTA.
10. I / We hereby certify that declarations made above are true and bonafide. In case there is change in any of the aforesaid declarations in future, I / we undertake to promptly intimate you of the said change.
11. I / We also undertake to provide all additional documents / information, as would be prescribed by the Indian Revenue authorities, in order to substantiate declaration stated above.

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12. Any liability including tax, interest or penalty arising on account of misrepresentation of facts by me / us in the above declaration would be indemnified by me / us to Anzen India Energy Yield Plus Trust.

*For <<**Name of entity / Individual**>>*

*Authorised Signatory*

**Date:**

**Place: `**