

Letter in case a Foreign Company does not have a “PE” in India <Company’s letter head>

Date:.....

Bosch Limited,

RBIN/BCS,

Post Box no. 3000,

Building 603, 3rd Floor

Hosur Road, Adugodi,

Bangalore– 560030

Email: Secretarial.Corp@in.bosch.com

**Subject: Declaration for claiming tax treaty benefits on dividend income for the period April 2026- March 2027
Folio Number / DP Id-Client Id:**

PAN of Shareholder:

With reference to the captioned subject, and in relation to the appropriate withholding of taxes on the Dividend payable to us by BOSCH LIMITED, 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>> for the period April 2026-March 2027 (Indian Fiscal Year) 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, <<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. .
5. 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.
6. We either do not have a Permanent Establishment (P.E.) in India or Dividend income earned by us is 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 Tax year 2026-27. 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.
7. We specifically confirm that our 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.

8. We confirm that we are entitled to claim the benefits under the Treaty as modified by the multilateral convention to implement tax treaty related measures to prevent base erosion and profit shifting (MLI) including but not limited to the Principal Purpose Test (PPT), limitation of benefit clause (LOB), period of holding of shares etc. as applicable.
9. We further indemnify Bosch Limited for any penal consequences arising out of any acts of commission or omission initiated by Bosch Limited by relying on our above averment.
10. I/We hereby furnish a copy of valid Tax Residency Certificate dated _____ having Tax Identification number _____ issued by _____ along with a copy of Form 41 duly filled and signed for the period April 2026-March 2027.

Thanking you,
Yours Sincerely,
For <Company's name>

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

Contact address:

Email address:

Contact Number:

Tax identification number of Shareholder: