

<On the letterhead of Shareholder>

Date:

To
Sterling Tools Limited,
Plot No. 4, DLF Industrial Estate
Faridabad-121003, Haryana

Dear Sir,

Re: Declaration for Indian income-tax purpose in relation to dividend declared on shares for Tax Year 2026-27

We hereby confirm the following:

1. [Shareholder's Name] is incorporated as a [Entity form] in and under the laws of [Country Name] with its registered office at [Entity Address]. The tax identification number issued by the [Relevant Authority Name] of [Country Name] is [Tax Identification Number]. [Entity Name] is a tax resident of [Country Name] in terms of Article [Number] of the Double Tax Avoidance Agreement entered between the Government of [Country Name] and the Government of India ('Tax Treaty').

OR

[Individual shareholder] is a tax resident of [Country Name] in terms of Article [Number] of the Double Tax Avoidance Agreement entered between the Government of [Country Name] and the Government of India ('Tax Treaty'). The tax identification number issued by the [Relevant Authority Name] of [Country Name] is [Tax Identification Number].

2. Our communication details are as follows:
Email id:
Contact No:
3. [Shareholder] holds a Tax Residency Certificate ('TRC') bearing reference number [Number] from the [Authority name] of [Country name], confirming its tax residency under the Tax Treaty for [Period] and is also eligible for the treaty benefit.
4. [Shareholder] does not and did not at any time have a permanent establishment in India through which the business is wholly or partly carried on during the period from [Date] to [Date] as provided in Article [Number] of the Tax Treaty between India and [Country name]
5. [Shareholder] is the beneficial owner of dividend declared on shares.
6. The place of effective management of [Shareholder] is in [Country name] and not in India i.e. all the key management and commercial decisions, which are necessary for the conduct of the business, are in substance made in [Country name].
7. The construct and affairs of [Shareholder] are not arranged with the main or principal purpose of obtaining any tax benefits, directly or indirectly, under the Tax Treaty.

8. I/We confirm that I/We have not entered into an impermissible avoidance arrangement i.e. an arrangement, the main purpose or one of the main purposes of which is to obtain a tax benefit and it (a) creates rights, or obligations, which are not ordinarily created between persons dealing at arm's length (b) results, directly or indirectly, in the misuse, or abuse, of the provisions of this Act (c) lacks commercial substance or is deemed to lack commercial substance under section 181, in whole or in part; or (d) is entered into, or carried out, by means, or in a manner, which are not ordinarily employed for bona fide purposes
9. I/We confirm that none of the principal purposes (as mentioned in revised Article ____ titled as "Limitation of Benefits" of the Treaty) of the transaction / arrangement / contract is to obtain tax benefit under the Treaty. (strike off if not applicable)

We hereby confirm that the above information is true to the best of our knowledge and belief. In case of any change in the facts stated above, we will inform you immediately. [Shareholder] undertakes to provide any further documentation or information as the Company may request.

Any liability arising on account of misrepresentation of facts by us in the above declaration would be indemnified by us.

For **<Shareholder's Name>**


Authorised Signatory