

*On the letterhead of Non-resident shareholder*

Date:

To  
Syngene International Limited  
Biocon SEZ, Biocon Park, Plot No.2&3  
Bommasandra Industrial Area  
IV Phase Jigani Link Road  
Bangalore – 560 099  
Karnataka, India

**Subject: Declaration regarding Tax Residency and Beneficial Ownership of shares**

**Ref: PAN – \_\_\_\_\_** (*Mention PAN of Shareholder*)

**Folio Number / DP ID/ Client ID – \_\_\_\_\_** (*Mention all account details*)

With reference to the captioned subject, and in relation to the appropriate withholding of taxes on the amount of dividend payable to me / us by **SYNGENE INTERNATIONAL LIMITED** (the Company), I / We hereby declare as under:

1. I / We, \_\_\_\_\_ (*name of the shareholder*), holding share/shares of the Company as on the record date, hereby declare that I am /we are tax resident of \_\_\_\_\_ (*country name*) for the period April 2024-March 2025 (Indian Fiscal Year) as per tax treaty between India and \_\_\_\_\_ (*country name*) (hereinafter referred to as 'said tax treaty') as modified by the "Multilateral Instrument (MLI)".
2. I/We will continue to maintain the 'tax resident' status in the above Country for the application of the provisions of the India-\_\_\_\_\_ (*Country of Residence*) DTAA, during the financial year 2024-25.
3. I / We do not have and will not any taxable presence, Permanent Establishment ('PE') or fixed base in India as construed under relevant Articles of the said tax treaty during the period April 2024 – March 2025.

Or

I /We have PE or fixed base in India during the period April 2024 – March 2025 as construed under relevant Articles of the applicable tax treaty and the dividend income receivable by me/us from investment in the shares of Syngene International Limited is not effectively connected to said PE in India.

4. I/We confirm that we do not/ will not have our Place of Effective Management in India during the period April 2024 - March 2025.

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5. I / We hereby declare that I am /we are the beneficial owner of the share/shares held in the Company as well as the dividend arising from such shareholding. 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. I/We confirm that I/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), Simplified Limitation of Benefits (SLOB), period of holding of shares etc., as applicable.
7. I/We specifically confirm that my affair / affairs 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. I /We declare that I am/We are the beneficial owner of the investments made by me/us in the shares of Syngene International Limited for an uninterrupted period of 365 days prior to and including the date of payment of the dividend.
9. I/We hereby furnish a copy of valid Tax Residency Certificate dated \_\_\_\_\_ having Tax Identification number \_\_\_\_\_ issued by \_\_\_\_\_ along with a copy of Form 10F generated electronically from the e-filing portal of the Income Tax Department, India for the period April 2024-March 2025.
10. 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 97, 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.
11. I / We hereby declare that Article 24 - Limitation of Relief under India-Singapore Double Taxation Avoidance Agreement (DTAA) shall not be applicable with respect to dividend received/ receivable from the above shares and supported by letter issued by the competent authority or any other evidence demonstrating the non-applicability of Article 24 - Limitation of Relief under India-Singapore DTAA. << *Required in case of shareholder being tax resident of Singapore*>>.
12. I/ We further indemnify the Company for any tax liability (including interest and penalty) that may arise on the Company in future on account of non-deduction / short deduction of tax at source based on the above declaration/documents furnished by me/us.

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13. I/We hereby confirm that the above declaration should be considered to be applicable for all the shares held in the Company under PAN/ accounts declared in the form.

14. I \_\_\_\_\_, hereby declare that the contents above are correct, complete and truly stated.

15. This declaration is valid for the period April 1, 2024 to March 31, 2025.

I/We undertake to intimate the Company immediately in case of any change in the aforesaid declaration.

Thanking you.

Yours faithfully,

For \_\_\_\_\_

Authorized Signatory

Name:

Designation:

Contact address:

Email address:

Contact Number:

*Note: Kindly strikethrough whichever is not applicable*

< The shareholders are required to provide a Declaration strictly as per the specified format given above, failing which the Company reserves the right to deny the Treaty benefits.>