

(ON THE LETTER HEAD OF NON-RESIDENT SHAREHOLDER)

Date:

To,

KFin Technologies Private Limited,
Unit: National Aluminium Company Limited
Selenium Tower B, Plot Nos. 31 & 32,
Financial District, Nanakramguda,
Serilingampally Mandal, Hyderabad – 500032

DECLARATION

I / We,, declare as follows in connection with the receipt of Dividend by me / us from National Aluminium Company Limited:-

1. That we are registered under the tax laws of having tax identification number
2. That we qualify as a 'Person' under Article 3 of Double Taxation Avoidance Agreement entered into by the Government of the Republic of India and the Government of ('DTAA') and are a tax resident of for the purpose of Article 4 of the DTAA and will continue to be resident during FY 2020-21. We are eligible to apply aforementioned DTAA read with the provisions laid down in Multilateral Instruments ('MLI'), wherever applicable for determination of our income tax liability in Republic of India.

We further confirm that our construct and affairs are not arranged with the main or principal purpose of obtaining any tax benefits, directly or indirectly, under the DTAA.

A certified copy of Tax Residency Certificate issued for the relevant period by the ('Revenue Authority') is enclosed herewith for your record.

3. That we do not have any Permanent Establishment or fixed base in India for the financial year 2020-21 as per Article 5 of the DTAA read with the provisions laid down in MLI, wherever applicable.
4. That we do not have a Business Connection in India as per Section 9(1)(i) of the Act for the financial year 2020-21.
5. That we are non-resident of India as per the provisions of section 6 of the Act and we do not have and will not have a Place of Effective Management in India as per section 6(3)(ii) of the Act during the financial year 2020-21.
6. That we are the beneficial owners of Shares of National Aluminium Company Limited and the dividend paid by National Aluminium Company Limited during the financial year 2020-21 and 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.

7. Further, our claim for relief under the DTAA is not restricted by application of Limitation of Benefit clause, if any, thereunder.

8. That we have no reason to believe that our claim for the benefits of the DTAA is impaired in any manner.

9. Our Permanent Account Number in India is

We further agree to indemnify National Aluminium Company Limited for any penal consequences arising out of any acts of commission or omission initiated by ational Aluminium Company Limited by relying on our above averment.

VERIFICATION

We,, make this declaration with the full understanding that this information will be utilized for the purpose of determining our Indian income tax liability in respect of dividend payment to be made by National Aluminium Company Limited. We hereby also declare that what is stated above is true and correct to the best of our knowledge and belief and we will immediately update the National Aluminium Company Limited about future changes in our above declaration.

Signature: _____

Name: _____

Designation: _____

Place: _____

Date: _____