

<< On letterhead of Registered Shareholder >>

Date:

To,
Kotak Mahindra Bank Limited
27BKC, C 27, G Block, Bandra Kurla Complex,
Bandra (East), Mumbai - 400 051

**Re: Declaration for eligibility to claim Tax treaty benefits, as modified by Multilateral Instrument (“MLI”),
(if applicable) in relation to receipt of dividend income from Kotak Mahindra Bank Limited**

In respect of captioned subject, I / We hereby declared as under:

1. I / We (Full name of the Shareholder) having Permanent Account Number (PAN) under the Indian Income Tax Act, 1961 (“The Act”) and holding (Mention number of shares held) share/s of the company. I / We am / are a tax resident of (Country name) and I/We are not under the Mutual Agreement Procedure (MAP) for the purpose of determining its residential status. The tax identification number issued by the (Relevant Authority Name) of (Country Name) is (Tax Identification Number).
2. A copy of the valid tax residency certificate alongwith a copy of Form 10F duly filled and signed for the period 1st April 2021 to 31st March 2022, is attached herewith.
3. I / We am / are tax resident of the (Country name) as defined under Article 4 the Double Tax Avoidance Agreement between India and _____ (the applicable tax treaty) read with MLI (if applicable) and do not qualify as a ‘resident’ of India under section 6 of the Act. I /We am / are eligible to be governed by the provision of the applicable tax treaty and satisfy all the necessary conditions to the benefits under the applicable tax treaty.
4. We do not have any permanent Establishment (PE) or fixed base in India as construed under relevant Articles of the applicable tax treaty nor do we have any taxable presence, PE or business connection in India as construed under the relevant provisions of the Act and the dividend paid/payable to us, in any case, are not attributable or not effectively connected to business operations, if any, carried out in India. Also, the place of effective management and control of _____ [Shareholder] is in _____ [Country name] and not in India as understood in the context of “residence” under the applicable tax Treaty and the Act and all the key management and commercial decisions, which are necessary for the conduct of the business, are in substance made in [Country name].
5. As required to claim the benefits of the lower tax rate under the applicable tax treaty in relation to the dividend income to be received by me / us from the Company. I / we specifically confirm that I / we am / are the legal and beneficial owner of the above referred equity shares of the company and the dividend income receivable from the Company in relation to the said share. I / we further declare that I / we have the right to use and enjoy the dividend received / receivable from the above share and such right is not constrained by any contractual and / or legal obligation to pass on such dividend to another person. Dividend received or to be received by me/us is as principal, and not as agent or nominee of any person or entity.
6. I/We are fully eligible for the benefits of the “Dividend” Article/ provision of the applicable tax Treaty with respect to dividend payment in accordance with the object and purpose of the relevant

<< On letterhead of Registered Shareholder >>

provisions of the Treaty taking into consideration protocol and the Multilateral Instrument ('MLI'), including, but not limited to, satisfaction of the "Principal Purpose Test" provided in such MLI.

7. I/we specifically confirm that my affairs / affairs of {full name of the shareholder} were not arranged such that the main purpose of the principal purpose thereof was to obtain tax benefits available under the applicable tax treaty.
8. I/We confirm that the arrangement of the _____ [Shareholder] is not covered under impermissible avoidance arrangement as per India domestic law contained in Chapter X-A of the Act ('GAAR provisions') and that GAAR provisions are not applicable to it.
9. I/We have Permanent Account Number (PAN) _____

OR

I/we does not have Permanent Account Number (PAN) under Indian Income Tax Act, 1961. However, as required u/s. 206AA of the Income Tax Act, 1961 r. w. Rule 37BC of the Income-tax Rules 1962, it certify its following particulars:

Sr No	Particulars	
1	Name of the taxpayer	
2	Address in the Country of Residence	
3	Email ID	
4	Contact Number	
5	Tax residency Certificate	
6	Tax Identification Number (TIN)	

We hereby certify that the declarations made above are true and bonafide. In case in future, any of the declarations made above undergo a change, we undertake to promptly intimate you of the said event.

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

Thanking you.

Yours faithfully,

For Name of the shareholder

Authorized Signatory - Name and designation

Note: Kindly strikethrough whichever is not applicable.