

DECLARATION FOR NON-RESIDENT SHAREHOLDERS

(To be declared by non-resident shareholder for availing the benefits of lower tax deduction under Section 90 of the Indian Income Tax Act, 1961 ('Act') read with the provisions of the Tax Treaty with India and the Multilateral convention to implement tax treaty related measures to prevent base erosion and profit shifting)

Date: _____

To,

Aster DM Healthcare Limited,
Awfis, 2nd Floor, Renaissance Centra,
27 & 27/1, Mission Rd, Sampangi Rama
Nagara, Rama Nagar, Bengaluru, Karnataka
560027

Subject: Self declaration for the financial year ('FY') 2024-25 of the Act to take tax treaty benefits in relation to receipt of dividend income from Aster DM Healthcare Limited ('the Company')

We, [.....] do hereby solemnly declare as follows:

- i. We are a resident of [name of country of which shareholder is tax resident] during the FY 2024-25. We are eligible to be governed by the provisions of the tax treaty between India and [name of country of which the shareholder is tax resident] and meet all the necessary conditions to avail the benefits under the said tax treaty. The claim of benefits by me / us under the said tax treaty is not impaired in any way.
- ii. We will continue to maintain the 'tax resident' status in its respective Country for the application of the provisions of the India- [COUNTRY OF RESIDENCE] double taxation avoidance agreement ('Tax Treaty'), during the FY 2024-25.
- iii. As required to claim the benefits of the lower tax rate under the Tax Treaty read with the provisions laid down in Multilateral Instruments, wherever applicable, in relation to the dividend income to be received by us from the Company, we specifically confirm that we are the beneficial owner of the above referred equity shares of the Company and the dividend income receivable from the Company in relation to the said shares;
- iv. We do not have any Permanent Establishment ('PE') or fixed base in India (as applicable) as construed under relevant Articles of the applicable tax treaty read with the provisions laid down in Multilateral Instruments, wherever applicable. The investments made by us in the shares of Aster DM Healthcare Limited are not arranged in a manner which results in obtaining a tax benefit, whether directly or

indirectly, as one of its principal purposes. The tax benefit, if any, derived from such investments would be in accordance with the object and purpose of the relevant provisions of the Tax Treaty.

- v. We hereby confirm that we do not have a place of effective management during the financial year 1st April 2024 to 31st March 2025 in India and none of the key management and commercial decisions for the conduct of business in substance are made in India.
- vi. We confirm that we have not entered into an impermissible avoidance arrangement i.e. an arrangement, the main purpose 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 or (b) results, directly or indirectly, in the misuse, or abuse, of the provisions of the Act or (c) lacks commercial substance or is deemed to lack commercial substance under section 97 of the Act, 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 as per section 96 of the Act.
- vii. ~~*We are the beneficial owner of the investments made by me/us in the shares of Aster DM Healthcare Limited and also any income receivable from such investments, for a period of less than 365 days.~~

OR

~~*We are the beneficial owner of the investments made by me/us in the shares of Aster DM Healthcare Limited and also any income receivable from such investments, for an uninterrupted period of 365 days or more including the date of payment of the dividends.~~

OR

~~*We are the beneficial owner of the investments made by me/us in the shares of Aster DM Healthcare Limited and also any income receivable from such investments, for a period of more than '....' days {required period of days under the relevant Double Taxation Avoidance Agreement}.~~

- viii. We further declare that 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.
- ix. We further declare that we are eligible to claim the benefits of the Tax Treaty including satisfaction of the Limitation of Benefits clause (wherever applicable) under the Tax Treaty.
- x. We undertake to intimate Aster DM Healthcare Limited immediately in case of any alteration in the aforesaid declaration.
- xi. I, [.....], hereby declare that the contents above are correct, complete and truly stated.

[To be provided on Shareholder's Letter head]

- xii. We will indemnify and hold harmless the Company for any tax, interest, penalty or related litigation cost that the Company may incur due to withholding of tax at a lower rate based on the Act or Tax Treaty arising out of any acts of commission or omission initiated by the Company by relying on my/our above averment.

In addition to the above, at the discretion of the Shareholder, within fourteen (14) days after the Shareholder has filed a return of its income with the income-tax authorities in India for the financial year 2024-25 during which dividend income is received from the Company, shareholder shall appoint a chartered accountant to obtain a certificate in the format prescribed in Annexure A to Form 26A prescribed under the Act, and shall provide a copy of such certificate to the Company. The Company agrees that Form 26A may be furnished by the Company to the relevant authorities only during an income-tax proceedings.

(Name, designation & signature of Non-resident Shareholder)

Company Seal

Date:

Place:

Address:

Email and Telephone:.....

PAN/Tax identification number (country of residence):.....

Notes:

1. *Delete whichever is not applicable.