

-----On the letterhead of vendor-----

Date: \_\_\_\_\_

To,

PI Industries Limited,  
Udaisagar Road, Udaipur,  
Rajasthan, 313001,  
India

Subject - Declaration regarding permanent establishment, beneficial ownership and satisfying the principle purpose test.

With reference to the captioned subject, and in relation to the appropriate withholding of taxes on the income / fund payable to me / us by PI Industries Limited, I / we hereby declare as under:

1. I / We, <<Name of the vendor>> have permanent account number (PAN) under the Indian income tax Act, <<mention PAN>>/ have not obtained Permanent Account Number (PAN) in India,
2. I / We am / are a tax resident of << name of the country >> and my/ our Tax Identification No. is << >> in the country of residency. A copy of the tax residency certificate for << year>>, which is valid as on the record date, is attached herewith.
3. My/ Our status as per <<name of the country>> Income tax Act is individual / firm / company.
4. Being a tax resident of the said country, I am / we are eligible to be governed by the provisions of the tax treaty between India and << name of the country >>.
5. As per the requirement of the relevant provisions of the above referred tax treaty, I am / we are the beneficial owner of the income derived from India against Invoice No / Agreement dated << date of agreement>>. The income/fund received from PI Industries Limited will be included in my / our income & is taxable in << name of the country >>.
6. I/ We further declare that I / we have the right to use and enjoy the income received/ receivable and such right is not constrained by any contractual and/ or legal obligation to pass on such income to another person.
7. I / We confirm that I / we satisfy the principal purpose test as laid down in the Multilateral Instruments (MLI). I/ we am/ are eligible to take recourse to the provisions of the tax treaty in force, in respect of the income derived from India.

8. I/ We do not have a business connection in India during the financial year 2026-27 as per the section 9(2) of the Income Tax Act, 2025.

Or

I / We have a business connection in India during the financial year 2026-27 as per the section 9(1)(2) of the Income Tax Act, 2025 but the income is / is not attributable to the business connection in India.

9. I / We do not have a Permanent Establishment in India as defined in the tax treaty in force and specifically Article 5 of the tax treaty in force during the Financial Year 2026-27.

Or

We have a Permanent Establishment in India during the financial Year 2026-27 but the amount paid/payable to us is not attributable to the Permanent Establishment in India.

Or

I / We do not have fixed base regularly available in India for performing activities as per Article on Independent Personal services of the tax treaty in force during the Financial Year 2026-27 and my /our stay in India during the year does not exceed the number of days as specified in the said Article.  
(applicable only for individual not for company)

Thanking you.

Yours faithfully

<<Name of the vendor>>

<< Signature >>

Authorised Signatory

**Note: Please strike off whatever is not applicable**