

**DECLARATION BY SHAREHOLDERS  
(TO BE FILLED IN BLOCK LETTERS ONLY)**

Name of shareholder: \_\_\_\_\_  
(As registered with the registrar)

Folio number: \_\_\_\_\_

Date (dd/mm/yyyy): \_\_\_\_ / \_\_\_\_ / \_\_\_\_

**To,  
Sirca Paints India Limited  
G-82, Kirti Nagar, Delhi-110015**

**Re: In relation to our dividend income of INR\_\_\_\_ per share from SIRCA PAINTS INDIA LIMITED (Cut-off Date 18/07/2022), I / We hereby declare and certify as under (*Strike off the paragraphs whichever is not applicable*):**

**1. RESIDENT SHAREHOLDERS**

- a. I / We, \_\_\_\_\_ <<*insert name of shareholder*>>, confirm that I am / we are a resident in India as per Section 6 of the Indian Income-tax Act, 1961, for the Financial Year 2021-22, i.e. 1 April 2021 to 31 March 2022 as (*strike off the paragraph inapplicable*):
- i. I am an individual, holding permanent account number ('PAN') \_\_\_\_\_ <<*insert PAN of shareholder*>> in India and satisfy the conditions provided under the Income Tax Act, 1961 to be considered as tax resident of India:
  - ii. We are a Hindu Undivided Family, Firm or Association of Persons, holds PAN \_\_\_\_\_ <<*insert PAN of shareholder*>> in India and our control and management of affairs is situated wholly within India.
  - iii. I / We, \_\_\_\_\_ <<*insert name of shareholder*>> classified as Trust, holds PAN \_\_\_\_\_ <<*insert PAN of shareholder*>> in India and satisfy the conditions provided under the Income Tax Act, 1961 to be considered as tax resident of India.
  - iv. We are a Company, holds PAN \_\_\_\_\_ <<*insert PAN of shareholder*>> in India and our key management and commercial decisions for conduct of business are made in India. Our Certificate of incorporation issued by the Government of India – Ministry of Corporate Affairs is enclosed herewith.

**Copy of PAN Card (duly self-attested) is enclosed herewith.**

- b. I / We hold \_\_\_\_\_ <<*insert number of shares held*>> shares as on record date. For such number shares, we affirm that:
- i. I am / we are the beneficial owner of above shares on the record date and also beneficially entitled to receive the dividend income to our name and account.

- ii. I / We have the right to use and enjoy the dividend received / receivable from the shares held by us in **SIRCA PAINTS INDIA LIMITED** and such right is not constrained by any contractual and / or legal obligation to pass on such dividend to another person.
- c. Our dividend income is not liable for tax deduction at source or tax is applicable at lower rate since (choose the applicable option):
  - i. Tax on my estimated income (including dividend income) for the period 1 April 2021 to 31 March 2022 shall be NIL.

**Copy of Form 15G / 15H is enclosed herewith.**

- ii. Lower / Nil rate of tax applies to me / us as I / we have obtained a lower / nil deduction certificate from my / our jurisdictional tax officer in relation to the dividend income from **SIRCA PAINTS INDIA LIMITED**.

**Copy of certificate is enclosed herewith.**

## **2. NON-RESIDENT SHAREHOLDERS**

### **I. Non-Resident shareholders (other than FIIs/ FPIs)**

- a. I am / We are a resident of \_\_\_\_\_ <<insert name of country of tax residence, if non-resident in India>> as per the domestic provisions of <<insert name of country>> and shall continue to be resident for FY 2021-22.

My / Our tax identification number issued by \_\_\_\_\_ <<insert name of authority of country of tax residence which has issued the tax identification number>> is \_\_\_\_\_ <<mention the tax identification number>> and PAN obtained in India is \_\_\_\_\_ <<insert PAN of shareholder, please mention not available in case PAN is not obtained>>.

My/ Our email id \_\_\_\_\_ <insert email id of shareholder>> and contact number is \_\_\_\_\_ <<insert contact number of shareholders>>

**A copy of Tax Residency Certificate (For FY 2021-22 and valid as on Cut-off date), Form 10F (duly executed) and PAN card (duly self-attested) [if available] are enclosed herewith.**

- b. I / We hold \_\_\_\_\_ <<insert number of shares held>> shares as on Cut-off date. For said number of shares, we affirm that:
  - i. I/ We hold full beneficial interest in the shares, dividend income and are entitled to the benefits of India \_\_\_\_\_ <<insert name of country of tax residence>>, Double Taxation Avoidance Agreement (DTAA) read with the provisions of Multilateral Instrument (MLI), wherever applicable.
  - ii. We further affirm that (*applicable in case of non-residents other than individuals*):
    - The construct and affairs of \_\_\_\_\_ <insert name of shareholder> are not arranged with the principal or one of the principal purposes of obtaining any tax benefits, directly or indirectly, under the Income Tax Act, 1961 or DTAA; or
    - Objective parameters laid out in the DTAA such as listing, ownership, activity etc. are fulfilled by me/ us to be regarded as qualified person for entitlement of DTAA; or

- We are not fiscally transparent entities and shall qualify as 'resident' of \_\_\_\_\_<<insert name of country of tax residence>>as per India-\_\_\_\_\_<<insert name of country of tax residence>> DTAA; or
  - The claim of benefits by us under the DTAA is not impaired in any way.
- iii. I / We have the right to use and enjoy the dividend received / receivable from the shares held by us in **SIRCA PAINTS INDIA LIMITED** and such right is not constrained by any contractual and / or legal obligation to pass on such dividend to another person
- c. We do not or shall not have a taxable presence, fixed base or Permanent Establishment (PE) in India as defined under the Indian Income-tax Act, 1961 and DTAA between India and \_\_\_\_\_<<insert name of country of tax residence>>read with the provisions laid down in MLI, wherever applicable, during the period 1 April 2021 to 31 March 2022.
- d. We do not have or shall not have a Place of Effective Management in India as per section 6(3)(ii) of the Act during the year 1 April 2021 to 31 March 2022.
- e. We further confirm that we do not have any business connection in India as per provisions of the Indian Income-tax Act 1961.
- f. Lower / Nil rate of tax applies to me / us as I / we have obtained a lower / nil deduction certificate from my / our jurisdictional tax officer in relation to the dividend income from **SIRCA PAINTS INDIA LIMITED**

**Copy of certificate is enclosed.**

- g. I/ We confirm that we shall file the income tax return in India disclosing the dividend income received from **SIRCA PAINTS INDIA LIMITED** in compliance with the provisions of Indian Income Tax Act, 1961.

## II. FIIs and FPIs

- a. We, \_\_\_\_\_<<insert name of shareholder>>, Foreign Portfolio Investor/ Foreign Institutional Investor registered with SEBI having registration number as <insert SEBI Registration Number>.
- b. We are a \_\_\_\_\_<insert legal entity status such as Firm/ Association of persons/ Trust/ foreign company/>holds PAN \_\_\_\_\_<insert PAN of the shareholder>in India.

**Copy of registration certificate and PAN card (duly self-attested) are enclosed herewith.**

## **3. SPECIFIC CATEGORY OF SHAREHOLDERS**

We declare that our dividend income is not eligible for tax deduction at source since (*choose the applicable option*):

- i. We are a mutual fund as defined under Section 10(23D) of the Income-tax Act, 1961
- ii. We are an Insurance company as defined under second proviso to Section 194 of the Income-tax Act, 1961

- iii. We are registered as a Category I / Category II Alternative Investment Fund, as defined under Section 10(23FBA) and clause (a) of Explanation 1 to Section 115UB of the Indian Income-tax Act, 1961.
- iv. We are an entity covered by Circular 18 of 2017 issued by the Central Board of Direct Tax and our income is unconditionally exempt under Section 10 of the Income-Tax Act, 1961 and we are statutorily not required to file return of income under Section 139 of the Act.
- v. We are a Corporation named \_\_\_\_\_ <<insert the name of set-up>> set up under \_\_\_\_\_ <<<insert the name of set-up>>Act>> whose income is exempt from any income-tax or can be considered as a 'Government' and qualify for exemption under section 196 of the Income tax Act, 1961.
- vi. We qualify as NPS Trust for the purpose of section 197A (1E) of the Income-tax Act, 1961 and our income is eligible for exemption under section 10(44) of the Income-tax Act, 1961.

**Copy of documentary evidence in relation to the above claim is enclosed herewith.**

**In case there is any change in the above details, I / we shall inform SIRCA PAINTS INDIA LIMITED immediately of such change to enable SIRCA PAINTS INDIA LIMITED to take appropriate corrective action.**

**I / We hereby confirm that the details/information provided in the above declaration are complete, true and correct. This declaration is issued to SIRCA PAINTS INDIA LIMITED to enable them to decide upon the withholding tax applicable on the dividend income receivable by me /us and conclusion of applicability of such withholding tax rate shall be at the discretion of SIRCA PAINTS INDIA LIMITED.**

**In the event, the Indian Revenue Authorities levies any charge on SIRCA PAINTS INDIA LIMITED (in the nature of tax, interest, penalty, compounding fees) on account of lower or non withholding of taxes basis the documents furnished by the shareholder, then the shareholder will fully indemnify SIRCA PAINTS INDIA LIMITED for any such demand including any other expenses (such as litigation cost etc.) incurred by SIRCA PAINTS INDIA LIMITED with respect to the same. Also, the shareholders shall undertake to provide SIRCA PAINTS INDIA LIMITED, on demand, the relevant details in respect of taxability/ non-taxability of the dividends considered by the shareholder, copies of tax returns filed in India, evidence of the tax paid, etc.**

Name of the shareholder:  
Signature (digital or physical):

Date:

Place:

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