

Date: 2023

Issuer Name

Issuer Address

Dear Sir/Madam,

Re: Declaration provided to **XTGLOBAL INFOTECH LIMITED ("The Company")** for claiming the tax treaty benefits for the financial year 2023-24 (ending on March 31, 2024).

Declaration

This is to confirm that,

- [NAME OF SHAREHOLDER] is a tax resident of [COUNTRY OF RESIDENCE] as per the provisions of the Agreement for Avoidance of Double Taxation and Prevention of Fiscal Evasion between India and [COUNTRY OF RESIDENCE] (the "India-[COUNTRY OF RESIDENCE] DTAA");
- [NAME OF SHAREHOLDER] will continue to maintain the 'tax resident' status in *his/her/its respective Country for the application of the provisions of the India-[COUNTRY OF RESIDENCE] DTAA, during the financial year 2023-24.
- [NAME OF SHAREHOLDER] is eligible to claim the benefits under the provisions of India-[COUNTRY OF RESIDENCE] DTAA;
- The claim of benefits by [NAME OF SHAREHOLDER] is not impaired in any way;
- [NAME OF THE SHAREHOLDER] does not have any taxable presence, fixed base or permanent establishment in India as per the provisions of the India- [COUNTRY OF RESIDENCE] DTAA during the Financial Year 2023-24; and
- [NAME OF THE SHAREHOLDER] does not have any Significant Economic Presence** located in India as per provisions of the Explanation 2A to Section 9(1)(i) of the Act during the Financial Year 2023-24.
- [NAME OF THE SHAREHOLDER] is the holder/ not the holder of (~~strikethrough whichever is not applicable~~) PAN allotted by the Income Tax Authorities in India.

- [NAME OF THE SHAREHOLDER] will immediately inform the Company if there is a change in the status.

*I/We hereby confirm that the declarations made above are complete, true and bona fide.

** Significant economic presence of a non-resident in India shall constitute "business connection" in India and "significant economic presence" for this purpose, shall mean—

(a) transaction in respect of any goods, services or property carried out by a non-resident with any person in India including provision of download of data or software in India, if the aggregate of payments arising from such transaction or transactions during the previous year exceeds such amount as may be prescribed; or **(The threshold prescribed is 2crores)**

(b) systematic and continuous soliciting of business activities or engaging in interaction with such number of users in India, as may be prescribed: **(The threshold prescribed is 3 lakhs users in India)**

Provided that the transactions or activities shall constitute significant economic presence in India, whether or not—

(i) the agreement for such transactions or activities is entered in India; or

(ii) the non-resident has a residence or place of business in India; or

(iii) the non-resident renders services in India:

Provided further that only so much of income as is attributable to the transactions or activities referred to in clause (a) or clause (b) shall be deemed to accrue or arise in India.

Yours faithfully,

For [NAME OF SHAREHOLDER]

Authorized Signatory [Name/designation]

Email address: [Please insert]

Contact Number: [Please insert]

Contact address: [Please insert]