**Declaration in case a Foreign Company does not have a “PE” in India**

**(Note: Details of declaration should be furnished for the Financial Year 2023-24)**

Kind Attention:

Mr. Chintan Doshi

Manager Legal and Company Secretary

To

**Styrenix Performance Materials Limited**

**(formerly known as INEOS Styrolution India Limited)**

9th Floor, “Shiva”, Sarabhai Complex,

Dr. Vikram Sarabhai Marg, Vadiwadi,

Vadodara – 390 023

Gujarat

This is to certify **that**

1. <<*Name of Company*>>, is a body corporate incorporated and registered in <<*Name of the country>*> under the laws of <<*Name of the country*>>.
2. We, <<*Name of company*>> confirm that we are a tax resident of <<*Name of country*>> during the Financial year 2023-24 and are eligible to claim benefits of the India - << *Name of country*>> Double Tax Avoidance Agreement (DTAA), read with the provisions laid down in Multilateral Instrument (MLI), wherever applicable.
3. Our Tax Identification Number issued by <<*Name of the authority>*> is <<*Tax Identification Number>*>
4. I/We hereby furnish a copy of valid Tax Residency Certificate dated \_\_\_\_\_\_\_\_\_\_ having Tax Identification number\_\_\_\_\_\_\_\_\_\_ issued by \_\_\_\_\_\_\_\_\_\_ along with a acknowledged copy of e-Form 10F duly filled and signed for the period April 2023-March 2024.
5. We, <<*Name of the company*>> are the beneficial owner of the shares allotted in above folio no. as well as of the dividend arising from such shareholding.
6. We further declare that we have 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.
7. We either do not have a Permanent Establishment (P.E.) in India or Dividend income earned by us is not attributable/effectively connected to our P.E. in India as defined under the Income Tax Act, 1961 and DTAA between India and <<*Name of Country*>> read with the provisions laid down in Multilateral Instruments (MLI).
8. Further, We confirm that we do not have any business connection in India as per provisions of Income Tax Act 1961. In the event of having P.E. in India or Dividend income is attributable/effectively connected to such P.E., we acknowledge our obligation to inform you forthwith with the necessary details.
9. I/We confirm that I/we are entitled to claim the benefits under the Treaty as modified by the multilateral convention to implement tax treaty related measures to prevent base erosion and profit shifting (MLI) including but not limited to the Principal Purpose Test (PPT), limitation of benefit clause (LOB), Simplified Limitation of Benefits (SLOB), period of holding of shares etc. as applicable
10. That the investments made by us in the shares of Styrenix Performance Materials Limited (formerly known as INEOS Styrolution India 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 between India and <<Name of *country*>>.
11. We are the beneficial owner of the investments made by us in the shares of Styrenix Performance Materials Limited (formerly known as INEOS Styrolution India Limited) and 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 us in the shares of Styrenix Performance Materials Limited (formerly known as INEOS Styrolution India Limited) and 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 us in the shares of Styrenix Performance Materials Limited (formerly known as INEOS Styrolution India Limited) and any income receivable from such investments, for a period of more than \_\_\_\_\_ days [required period of days under the relevant Double Taxation Avoidance Agreement].

1. We further declare that we are eligible to claim benefit of the tax treaty between India and <<Name of the Country>> including satisfaction of the Limitation of Benefits clause (wherever applicable) during the Financial Year 2023-24 (covering the period from 1st April, 2023 to 31st March, 2024).

We hereby confirm that the above information is true to the best of our knowledge. In case of any change in the facts stated above, we will inform you immediately and we undertake to provide any further documents or information as the company may request.

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

Thanking you

Yours Sincerely,

# For <<*Name of company*>>

**Name: <<*Authorized person name*>>**

**<<*Designation of authorized person*>>**