

(ON THE LETTER HEAD OF SHAREHOLDER)

Date: __/__/20__

ZEN TECHNOLOGIES LIMITED

B-42, Industrial Estate, Sanath Nagar,
Hyderabad, Telangana, India – 500018

Dear Sir/Madam,

Re: Declaration provided to Zen Technologies Limited ("The Company") for claiming the tax treaty benefits for the financial year 2026-27 (ending on March 31, 2027).

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 2026-27.
- [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] is the beneficial owner of [NO OF SHARES] shares held in the Company as per Folio / demat account _____ (if shares are held under different Folio No., give separate details for all). Further, [NAME OF THE SHAREHOLDER] is the beneficial owner of dividend receivable from the Company in relation to aforementioned shares;
- [NAME OF THE SHAREHOLDER] also declare that we do not have business connection in India as per Section 9 of the Income-tax Act, 1961.
- [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 2026-27;
- [NAME OF THE SHAREHOLDER], being tax resident of [COUNTRY OF RESIDENCE], fulfil all the conditions of the said tax treaty including General Anti Avoidance Rules ('GAAR') to be eligible to claim the beneficial rate provided under the said tax treaty for the purposes of tax withholding on dividend declared by the Company;
- [NAME OF THE SHAREHOLDER] hereby satisfy the Principle Purpose Test as per the said tax treaty. I/We specifically confirm that my/our affairs were not arranged such that the main purpose or the principal purpose thereof was to obtain tax benefits available under the applicable tax treaty;

- [NAME OF THE SHAREHOLDER] complies with any other condition prescribed in the relevant Tax Treaty and provisions under the Multilateral Instrument (MLI);
- [NAME OF THE SHAREHOLDER] does not and will not have a Place of Effective Management ('POEM') in India during the financial year 2026-27;
- [NAME OF THE SHAREHOLDER] confirm that our claim for relief under the said tax treaty is not restricted by application of Limitation of Benefit clause, if any, thereunder;
- [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, further declare that I/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.

*I/ We, confirm that the above is true to the best of our knowledge and I / We shall be solely responsible for any adverse income-tax consequences (tax, including interest and penalty) arising under Income Tax Act, 1961 in relation to the dividend income to be received from the Company. Further, I / We, agree and undertake: (1) to indemnify the Company in relation to any Income tax consequences (tax, including interest and penalty) arising under the Income Tax Laws if any of the above is questioned and held otherwise by the Income Tax Authorities; (2) to provide all the necessary documentation as sought by the Income Tax Authorities in this regard.

*I/We hereby confirm that the declarations made above are complete, true and bona fide. This declaration is issued to the Company to enable them to decide upon the withholding tax applicable on the dividend income receivable by [NAME OF SHAREHOLDER].

In the event of withholding (TDS) tax liability arises out of the above transaction on Zen Technologies Limited, [NAME OF THE SHAREHOLDER] will provide all the documents/support to Zen Technologies substantiating the facts above and if a final withholding tax liability is confirmed, it will be indemnified by [NAME OF THE SHAREHOLDER].

Yours faithfully,

For [NAME OF SHAREHOLDER]

Authorized Signatory [Name/designation]

Email address: [Please insert]

Contact Number: [Please insert]

Contact address: [Please insert]