

(On the Letter Head of the party / vendor)

Date:

To  
JSW Steel Limited  
JSW Centre,  
Bandra Kurla Complex,  
Bandra (East),  
Mumbai 400 051

**Subject: Declaration regarding Tax Residency and Beneficial Ownership of shares**

**Ref: PAN (if available) – Mention PAN of Shareholder  
Folio Number / DP ID/ Client ID – Mention all the account details**

With reference to the captioned subject, and in relation to the appropriate withholding of taxes on the Dividend payable to me / us by **JSW STEEL LIMITED** (the Company), I / We hereby declare as under:

1. I / We, **Full name of the shareholder** \_\_\_\_\_, holding share/shares of the Company as on the record date, hereby declare that I am /we are tax resident of **country name** for the period April 2022-March 2023 (Indian Fiscal Year) as per tax treaty between India and **country name** (hereinafter referred to as 'said tax treaty').
2. I / We hereby declare that, I am /we are the beneficial owner of the share/shares held in the Company as well as the dividend arising from such shareholding; and 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.
3. I/We confirm that I/We are entitled to claim the benefits under the tax 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 for a minimum period of prescribed days, etc. as applicable.
4. I/We hereby furnish a copy of valid Tax Residency Certificate dated \_\_\_\_\_ having Tax Identification number \_\_\_\_\_ issued by \_\_\_\_\_ along with a copy of Form 10F duly filled and signed for the period April 2022-March 2023.
5. Our Indian Permanent Account Number \_\_\_\_\_ /We do not have a PAN allotted to us by Indian income-tax authorities **<<strike off what is not applicable>>**. In case, PAN is not available, I/We confirm the following details as
  - (a) name \_\_\_\_\_
  - (b) email id \_\_\_\_\_
  - (c) contact number \_\_\_\_\_
  - (d) address in residency country \_\_\_\_\_
  - (e) tax residency certificate from the Government of that country or specified territory \_\_\_\_\_
  - (f) tax Identification Number of the residency country \_\_\_\_\_

6. I/We do not have any Permanent Establishment or fixed base or taxable presence in India as construed under relevant Articles of the applicable tax treaty read with the provisions laid down in MLI, wherever applicable, nor do we have any Permanent Establishment or business connection or taxable presence in India as construed under the relevant provisions of the Income Tax Act, 1961. Further, I/We do not have a

Business Connection in India according to the provision of Section 9(1)(i) of the Income Tax Act, 1961 and the amounts paid/payable to us, in any case, are not attributable to, nor are effectively connected to business operations, if any, carried out in India.

7. I /We have any Permanent Establishment or fixed base in India as construed under relevant Articles of the applicable tax treaty but the dividend income receivable by me/us from investment in the shares of the Company is not effectively connected to said permanent establishment in India.
8. We hereby confirm that we do not have a Place of Effective Management during the financial year 1st April, 2022 to 31st March, 2023 in India.
9. I/We confirm that I/We have not entered into an impermissible avoidance arrangement i.e. an arrangement, the main purpose or one of the main purposes of which is to obtain a tax benefit and it (a) creates rights, or obligations, which are not ordinarily created between persons dealing at arm length (b) results, directly or indirectly, in the misuse, or abuse, of the provisions of the Income Tax Act, 1961 (c) lacks commercial substance or is deemed to lack commercial substance under section 97 of the Income Tax Act, 1961, in whole or in part; or (d) is entered into, or carried out, by means, or in a manner, which are not ordinarily employed for bona fide purposes.
10. I/ We further indemnify the Company for any consequences (including loss / tax cost) arising out of any acts of commission or omission initiated by the Company by relying on my/ our above averment.
11. I/We hereby confirm that the above declaration should be considered to be applicable for all the shares held in the Company under PAN/ accounts declared in the form. This declaration is valid for the period 1<sup>st</sup> April, 2022 to 31<sup>st</sup> March, 2023.
12. I/We do not have any reason to believe that claim for benefits of the tax treaty is impaired in any manner.

Thanking you.

Yours faithfully,

For Name of the shareholder

<<insert signature>>

Authorized Signatory - Name and designation

Contact address: \_\_\_\_\_ [Please insert]

Email address: \_\_\_\_\_ [Please insert]

Contact Number: \_\_\_\_\_ [Please insert]

Tax Identification Number \_\_\_\_\_ [Please insert]

**Note:**

1. The shareholders are required to provide a Declaration strictly as per the specified format given above, failing which the Company reserves the right to deny the Treaty benefit.