Declaration by non-resident shareholder for availing the benefits of lower tax deduction under Section 90 of the Indian Income-tax Act, 1961 read with the provisions of the Double Taxation Avoidance Agreement with India read along with Multilateral Instrument (MLI)

To,

Strides Pharma Science Limited, 201, Devavrata, Sector 17, Vashi, Navi Mumbai – 400 703

Subject – Declaration for receiving dividend from Strides Pharma Science Limited ('Strides'/ 'the Company') during the FY 2023-2024

- 1. I / We, << Name of the shareholder >> confirm that I am / we are and will continue to be a tax resident of <<Insert country>> in terms of provisions of the Double Tax Avoidance Agreement ('DTAA') entered into between the Government of the Republic of India and << insert respective country>> read with the provisions laid down in Multilateral Instrument ('MLI'), as applicable during the Financial Year 2023-2024. I am a Non-resident of India as per the Income-tax Act, 1961 ('the Act').
- 2. I am/ we are the ultimate beneficial owner of the investments in the shares of Strides and the dividend income arising thereon.
- 3. 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.
- 4. I/We being tax resident of << insert country>>, fulfil all DTAA related conditions including General Anti Avoidance Rules ('GAAR') under the Act to be eligible to claim the beneficial rate provided under the India <<insert respective country >> DTAA for the purposes of tax deduction on dividend declared by Strides.
- 5. I / We have no reason to believe that its claim for the benefits of DTAA under the India- <<insert respective country>> is impaired in any manner.
- 6. I / We do not have a taxable presence or a fixed base / permanent establishment ('PE') in India. Hence, the dividend income receivable by me/us as stated above is not effectively connected to any fixed base / PE in India.
- 7. Declaration under Multilateral Instrument (MLI) (Strick out relevant para if not applicable) -
 - I/We hereby declare that the investments made by me/us in the shares of Strides 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 DTAA between India and <<Insert respective country>>.

• I / We, hereby declare that I /we am / are 'Qualified Person' of <<Country of residence>> as per paragraphs 8 to 13 to Article 7 of the MLI and shall be eligible for benefits of the India - <<Insert respective country>> DTAA.

< <in above,="" add="" addition="" any="" benefit="" claim="" condition,="" enables="" feel="" free="" other="" please="" that="" the="" to="" treaty="" you="">></in>
I / We, [] hereby declare that the contents above are correct, complete and truly stated. In the event, Strides is liable for any tax demand (including interest and penalty) arising on account of lower/ non-deduction of taxes basis the declaration / documents furnished by us, then I / we will fully indemnify the Company for any tax demand arising thereon.
(Name, designation & signature of Non-resident Shareholder)
Company Seal (if applicable)
Date: Place: Address: Email and Telephone: