

Self-declaration of beneficial ownership and income not effectively connected to any permanent establishment in India

(To be declared by non-resident shareholder for availing the benefits of lower tax deduction under Section 90 of the Indian Income Tax Act read with the provisions of the Double Tax Avoidance Treaty with India read along with Multilateral Instrument)

Date:

To
Biocon Limited
20th KM, Hosur Road
Electronic City, Bangalore
Karnataka 560100.

Subject: Declaration regarding Tax Residency and Beneficial Ownership of shares

Ref: PAN – 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 **BIOCON 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') as modified by the "Multilateral Instrument (MLI)" and meet all the necessary conditions to avail the benefits under the said tax treaty.
2. I/We 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 2022-23.
3. I / We do not have any Permanent Establishment ('PE') or fixed base in India as construed under relevant Articles of the said tax treaty nor do we have any PE or business connection in India as construed under the relevant provisions of the Act during the period April 2022 – March 2023.
4. I/We confirm that we do not/ will not have our Place of Effective Management in India during the period 1st April 2021 to 31st March 2022. I/We declare that the dividend

income receivable by me/us from investment in the shares of Biocon Limited is not effectively connected to any permanent establishment in India.

5. 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.
6. 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.
7. We specifically confirm that my affair / 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.
8. 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.
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's length (b) results, directly or indirectly, in the misuse, or abuse, of the provisions of this Act (c) lacks commercial substance or is deemed to lack commercial substance under section 97, 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 am/We declare that I am/We are the beneficial owner of the investments made by me/us in the shares of Biocon Limited for an uninterrupted period of 365 days prior to and including the date of payment of the dividends.
11. I/ We further indemnify the Company for any penal consequences arising out of any acts of commission or omission initiated by the Company by relying on my/ our above averment.
12. The claim of benefits by me/us is not impaired in any way;

13. 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 April 2021 to 31 March 2022.

I/We undertake to intimate Biocon Limited immediately in case of any alteration in the aforesaid declaration including change in tax residential status, etc.

I, [.....], hereby declare that the contents above are correct, complete and truly stated.

< 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 benefits.>

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: Kindly strikethrough whichever is not applicable