

INSTRUCTIONS ON TAX DEDUCTIBLE AT SOURCE ON DIVIDEND

In accordance with the provisions of the Income Tax Act, 1961, (Act) as amended by the Finance Act, 2020, effective April 1, 2020, dividend declared and paid by Company shall be taxable in the hands of the shareholders. The Company is required to deduct tax at source (TDS) at the rates applicable to each category of shareholders. The rates of TDS for various categories of shareholders and the required documents are provided below: -

Resident Shareholders: -

- 1. No tax shall be deducted for resident individual shareholders, if the aggregate amount of dividend to be paid during FY 2022-2023 does not exceed ₹ 5,000/-.
- 2. Where, Permanent Account Number (PAN) of the recipient of dividend is available with the Company and is valid:
 - a. In accordance with Section 194 of the Act, TDS will be @ 10%, if the amount of dividend payable exceeds ₹ 5,000/-; and
 - b. No tax at source shall be deducted on dividend payable in cases where the shareholder provides duly completed and signed Form 15G (applicable to any person other than a Company or a Firm) or Form 15H (applicable to an individual above the age of 60 years), provided that all the eligibility conditions are met. Form 15G and Form 15H are appended herein below (Annexures I and II).
- **3.** Where PAN is either not available or is invalid, TDS will be @ 20%.
- 4. As per the provisions of Section 206AB of the Act, effective July 1, 2021, where shareholders have not filed their Income Tax returns for FY 2020-21 and the aggregate of TDS and tax collected at source is ₹50,000 or more in the said year ('Specified Persons') TDS will be @ 20%. The Central Board of Direct Taxes (CBDT) has prescribed the functionality for determining whether a person fulfills the conditions of being a 'Specified Person' or not. Accordingly, the Company will verify from the above functionality provided by CBDT whether any shareholder of the Company qualifies as a 'Specified Person' prior to applying the relevant TDS rates.
- 5. Insurance Companies, Mutual Funds registered under Section 10(23D) of the Act, Alternate Investment Funds (AIF) established/incorporated in India, whose income is exempt under Section 10 (23FBA) of the Act and Governments (Central/State) shall provide appended declaration (Annexure III).

Non-Resident Shareholders:

- 1. Tax is required to be deducted in accordance with the provisions of Section 195 of the Act at applicable rates in force. Accordingly, TDS @ 20% (plus applicable surcharge and health & education cess) shall be deducted on the amount of dividend payable.
- 2. Pursuant to Section 90(2) of the Act, non-resident shareholders including Foreign Institutional Investors (FIIs) and Foreign Portfolio Investors (FPIs) have an option to be governed by the provisions of Double Tax

Avoidance Agreement (DTAA) between India and the country of tax residence of the shareholder, if such DTAA provisions are more beneficial to them.

To avail of DTAA benefits, non-resident shareholders shall furnish the following documents not later than **5.00 p.m. (IST) on Friday, July 15, 2022,** to the RTA via link https://linkintime.co.in/formsreg/submission-of-form-15g-15h.html.

- a. Self-attested copy of PAN allotted by the Indian income tax authorities;
- b. Self-attested Tax Residency Certificate (TRC) issued by the tax/competent authority of the country of residency, evidencing and certifying tax residency status in that country during FY2022-23. In case, the TRC is in a language other than English, a duly notarized and apostilled copy thereof, translated in English language would have to be provided;
- c. Duly completed and signed Form 10F appended (Annexure IV); and
- d. Self-declaration by non-resident shareholders appended (Annexure V) regarding:
 - i) Eligibility to claim the beneficial DTAA rate, including having regard to the Principal purpose Test (if any), included in the applicable tax treaty with India for the purposes of tax withholding on dividend declared by the Company;
 - Shareholder being the beneficial owner of the dividend income to be received on the equity shares;
 - iii) No Permanent Establishment/fixed base in India in accordance with the applicable DTAA; and
 - iv) Continue to remain a tax resident of the country of residency during FY2022-23.

The Company is not obligated to apply the beneficial DTAA rates at the time of tax deduction/withholding on dividend amounts. Application of beneficial DTAA rate shall depend upon the completeness of the documents submitted by the Non-Resident shareholder and in accordance with the provisions of the Act.

In order to enable to determine the appropriate tax rate at which tax has to be deducted at source under the respective provisions of the Act, Members are requested to provide the above-mentioned details and documents as applicable **on or before Friday, July 15, 2022.** Dividend will be paid after deduction of tax at source as determined based on the aforementioned documents provided by shareholders as applicable to them and being found to be satisfactory.

For all Shareholders:

Shareholders holding shares under multiple accounts under different status/category and single PAN, are requested to note that higher of the tax rate as applicable to the status in which shares held under a PAN will be considered on their entire holding in different accounts.

Only scanned copies of the aforementioned documents will be accepted by the Company as per the procedure laid down. Duly completed and signed documents are required to be submitted to RTA by uploading them on https://linkintime.co.in/formsreg/submission-of-form-



15g-15h.html on or **before Friday, July 15, 2022,** in order to enable the Company to determine and deduct appropriate TDS/withholding tax.

Those Shareholders, who have already furnished Annexures I to V, as may be applicable, are not required to furnish them again.

On clicking the above link, the user will be prompted to select/share the following information to register their request: -

- 1. Select the company (Dropdown)
- 2. Folio/DP Client ID
- **3.** PAN
- 4. Financial year (Dropdown)
- 5. Form selection
- 6. Document attachment 1 (PAN)
- 7. Document attachment 2 (Applicable Form(s))
- **8.** Document attachment 3 (Any other supporting document)

Please note that no communication on tax determination/deduction shall be entertained after Friday, July 15, 2022. Documents received through any other modes viz. email or hand delivery will not be considered to determine/deduct TDS/withholding tax.

Shareholders are requested to note that in case tax on dividend is deducted at a higher rate on account of non-receipt or insufficiency of requisite documents, they can claim refund at the time of filing income tax return. No claim shall lie against the Company for taxes once deducted. The Company will e-mail a soft copy of the TDS certificate to shareholders on their registered e-mail IDs post completion of activities. Shareholders

may view the credit of TDS in Form 26AS, which can be downloaded from their e-filing account at https://www.incometax.gov.in.

Shareholders are requested to update their PAN and e-mail address with depositories (for shares held in demat mode) and with the RTA (for shares held in physical mode), if not already done.

In the event the dividend income as on the **Record Date**, i.e. Friday, July 15, 2022, is assessable to tax in the hands of a person other than the registered shareholder (viz., the shares are held by a clearing member, broker etc. on behalf of the actual beneficial owner), such registered shareholder (i.e. the said clearing member, broker etc.) is required to furnish to the Company/RTA on or before Tuesday, July 19, 2022, a declaration containing name, address, residential status, PAN and amount of dividend of the actual beneficial owner to whom TDS credit is to be given and reasons for giving credit to such person. No request in this regard will be considered by the Company after Tuesday, July 19, 2022.

Pursuant to General Circular No. 20/2020 dated May 5, 2020, issued by the Ministry of Corporate Affairs, Government of India, dividend will be paid electronically in the bank accounts of Shareholders. The Company will despatch through postal services, demand drafts for dividend payments to those shareholders who have not registered their bank details. Shareholders holding shares in demat form are advised to keep the bank details updated with their depository participants. Shareholders holding shares in physical form and who have not updated their bank accounts details are requested to update the same with Link Intime after following the process available on the link https://linkintime.co.in/emailreg/email_register.html.

Annexure - I

Name of the Company	Lupin Limited
DP ID - Client ID/Folio No.	

INCOME TAX RULES, 1962

FORM NO.15G

[See Section 197A(1), 197A(1A) and Rule 29C]

Declaration under Section 197A(1) and Section 197A(1A) to be made by an individual or a person (not being a company or firm) claiming certain incomes without deduction of tax

PART - I

2. PAN of the	e Assessee ¹		
4. Previous year (P.Y.) ³ (for which declaration is being made): 2022-2023		5. ResidentialStatus ⁴	
7. Name of P	remises	8. Road/Street/Lane	9. Area/Locality
11. State		12. PIN	13. E-mail
- (-,		Yes	No
(b) If yes, latest assessment year for which assessed			
17. Estimated total income of the P.Y. in which income mentioned in column16 to be included ⁶		ned in column16 to be	
r than this form filed during the previous year, if any ⁷			
Aggregate amount of income for which Form No.15G filed			
19. Details of income for which the declaration is filed			
		Section under which tax is deductible	Amount of income
	Dividend Income	194	
	4. Previous y (for which made): 20 7. Name of P 11. State 15. (a) Wheth under the (b) If yes, 17. Estimated included ⁶ han this form f	(for which declaration is being made): 2022-2023 7. Name of Premises 11. State 15. (a) Whether assessed to tax under the Income-Tax Act, 19615: (b) If yes, latest assessment yea 17. Estimated total income of the Princluded6 han this form filed during the previous Aggregate amount of income for we declaration is filed f relevant cc.8 Nature of income	4. Previous year (P.Y.) ³ (for which declaration is being made): 2022-2023 7. Name of Premises 8. Road/Street/Lane 11. State 12. PIN 15. (a) Whether assessed to tax under the Income-Tax Act, 1961 ⁵ : (b) If yes, latest assessment year for which assessed 17. Estimated total income of the P.Y. in which income mention included ⁶ than this form filed during the previous year, if any ⁷ Aggregate amount of income for which Form No.15G filed a declaration is filed for relevant The relevant of the previous of the P.Y. in which tax is deductible tax is deductible

Signature of the Declarant9

Dec	laration	/Varifi	cation ¹⁰
Dec	ıaratıvı	/ veiiii	cation

*I/We.....do hereby declare that to the best of *my/our knowledge and belief what is stated above is correct, complete and is truly stated.

*I/We declare that the incomes referred to in this Form are not includible in the total income of any other person under sections 60 to 64 of the Income-tax Act, 1961.

*I/We further declare that the tax *on my/our estimated total income including *income/incomes referred to in column 16 *and aggregate amount of *income/incomes referred to in column 18 computed in accordance with the provisions of the Income-tax Act, 1961, for the previous year ending on 31st March 2023 relevant to the assessment year 2023-2024 will be nil.

*I/We also declare that *my/our *income/incomes referred to in column 16 and the aggregate amount of *income/incomes referred to in column 18 for the previous year ending on 31st March, 2023 relevant to the assessment year 2023-2024 will not exceed the maximum amount which is not charge-able to income-tax.

Place	
Date:	

Signature of the Declarant9

1. Substituted by IT (Fourteenth Amendment) Rules 2015, w.e.f. 1-10-2015. Earlier Form No.15G was inserted by the IT (Fifth Amendment) Rules, 1982, w.e.f. 21-6-1982 and later on amended by the IT (Fifth Amendment) Rules, 1989, w.e.f. 1-4-1988, IT (Fourteenth Amendment) Rules, 1990, w.e.f. 20-11-1990 and IT (Twelfth Amendment) Rules, 2002, w.e.f. 21-6-2002 and substituted by the IT (Eighth Amendment) Rules, 2003, w.e.f. 9-6-2003 and IT (Second Amendment) Rules, 2013, w.e.f. 19-2-2013.

PART - II [To be filled by the person responsible for paying the income referred to in column 16 of Part I]

1. Name of the person responsible for paying	2. Unique Identification No. ¹¹	
3. PAN of the person responsible for paying	4. Complete Address	5. TAN of the person responsible for paying
6. E-mail	7. Telephone No. (with STD Code)a	nd Mobile No.
6. E-IIIdii	8. Amount of income paid ¹²	
9. Date on which Declaration is received (DD/MM/YYYY)	10. Date on which the income has k	peen paid/credited (DD/MM/YYYY)

	Signature of the person responsible
Place:	for paying the income referred to in
Date:	column 16 of Part I

*Delete whichever is not applicable.

- 1. As per provisions of section 206AA(2), the declaration under Section 197A(1) or 197A(1A) shall be invalid if the declarant fails to furnish his valid Permanent Account Number (PAN).
- 2. Declaration can be furnished by an individual under Section 197A(1) and a person (other than a company or a firm) under Section 197A(1A).
- **3.** The financial year to which the income pertains.
- 4. Please mention the residential status as per the provisions of Section 6 of the Income-tax Act, 1961.
- 5. Please mention "Yes" if assessed to tax under the provisions of Income-tax Act, 1961, for any of the assessment year out of six assessment years preceding the year in which the declaration is filed.
- 6. Please mention the amount of estimated total income of the previous year for which the declaration is filed including the amount of income for which this declaration is made.
- 7. In case any declaration(s) in Form No.15G is filed before filing this declaration during the previous year, mention the total number of such Form No.15G filed along with the aggregate amount of income for which said declaration(s) have been filed.
- 8. Mention the distinctive number of shares, account number of term deposit, recurring deposit, National Savings Schemes, life insurance policy number, employee code, etc.
- 9. Indicate the capacity in which the declaration is furnished on behalf of a HUF, AOP, etc.

- 10. Before signing the declaration/verification, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under section 277 of the Income-tax Act, 1961 and on conviction be punishable-
 - (i) In a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine; and
 - (ii) In any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine;
- 11. The person responsible for paying the income referred to in column 16 of Part I shall allot a unique identification number to all the Form No.15G received by him during a quarter of the financial year and report this reference number along with the particulars prescribed in Rule 31A(4)(vii) of the Income-tax Rules, 1962, in the TDS statement furnished for the same quarter. In case the person has also received Form No.15H during the same quarter, please allot separate series of serial number for Form No.15G and Form No.15H.
- 12. The person responsible for paying the income referred to in column 16 of Part I shall not accept the declaration where the amount of income of the nature referred to in sub-section (1) or sub-section (1A) of Section 197A or the aggregate of the amounts of such income credited or paid or likely to be credited or paid during the previous year in which such income is to be included exceeds the maximum amount which is not chargeable to tax for deciding the eligibility, he is required to verify income or the aggregate amount of incomes, as the case may be, reported by the declarant in columns 16 and 18.

Annexure - II

Name of the Company	Lupin Limited
DP ID - Client ID/Folio No.	

¹FORM NO. 15H

[See Section 197A(1C) and Rule 29C]

Declaration under Section 197A(1C) to be made by an individual who is of the age of sixty years or more claiming certain incomes without deduction of tax.

PART - I

1. Name of Assessee (Declarant)		ent Account Number or Number of the Assessee ¹	3. Date of Birth ² (DD/MM/YYYY)	
4. Previous year (P.Y.) ³ (for which declaration is being made) 2022-202 .	· · ·	or/Block No.	6. Name of Premises	
7. Road/Street/Lane	8. Area/Lo	cality	9. Town/City/District	10. State
11. PIN	12. E-mail		13. Telephone No. (wi and Mobile No.	ith STD Code)
14 (a) Whether assessed to tax ⁴ :			Yes	No
(b) If yes, latest assessment year for v	vhich assessed			
15. Estimated income for which this dec	aration is mad	e		
16. Estimated total income of the P.Y. in which income mentioned in column 15 to be included ⁵				
17. Details of Form No.15H other than thi	s form filed for	the previous year, if any ⁶		
Total No. of Form No.15H filed	Aggregate amount of income for which		Form No.15H filed	
18. Details of income for which the decla	ration is filed			
SI. Identification number of relevant No. investment/account, etc. ⁷	Na	ture of income	Section under which tax is deductible	Amount of income
	Div	vidend	194	

Signature of the Declarant

^{1.} Substituted by the IT (Fourteenth Amendment) Rules, 2015, w.e.f. 1-10-2015. Earlier Form No. 15H was amended by the IT (Fifth Amendment) Rules, 1982, w.e.f. 21-6-1982, IT (Fifth Amendment) Rules, 1989, w.r.e.f. 1-4-1988, IT (Fourteenth Amendment) Rules, 1990, w.e.f. 20-11-1990, IT (Twelfth Amendment) Rules, 1992, w.e.f. 1-6-1992, IT (Seventh Amendment) Rules, 1995, w.e.f. 1-7-1995, IT (Thirty-second Amendment) Rules, 1999, w.e.f. 19-11-1999, IT (Twelfth Amendment) Rules, 2002, w.e.f. 21-6-2002, IT (Eighth Amendment) Rules, 2003, w.e.f. 9-6-2003, IT (Fourteenth Amendment) Rules, 2003, w.e.f. 1-8-2003 and IT (Second Amendment) Rules, 2013, w.e.f. 19-2-2013.

Declaration/Verification [®]	
I	knowledge and belief what is orm are not includible in the er declare that the tax on my amount of *income/incomes
Place:	
Date:	Signature of the Declarant
PART II	

[To be filled by the person responsible for paying the income referred to in column 15 of Part I]

1. Name of the person responsible for paying	2. Unique Identification No. ⁹		
Permanent Account Number or Aadhaar Number of the person responsible for paying	4. Complete Address	5. TAN of the person responsible for paying	
6. E-mail	7. Telephone No. (with STD Code) and Mobile No.	8. Amount of income paid ¹⁰	
9. Date on which Declaration is received (DD/MM/YYYY)	10. Date on which the incor (DD/MM/YYYY)	me has been paid/credited	

	Signature of the person responsible
Place:	for paying the income referred to in
Date:	column 15 of Part I

*Delete whichever is not applicable.

- 1. As per provisions of Section 206AA(2), the declaration under Section 197A(1C) shall be invalid if the declarant fails to furnish his valid Permanent Account Number or Aadhaar Number.
- 2. Declaration can be furnished by a resident individual who is of the age of 60 years or more at any time during the previous year.
- 3. The financial year to which the income pertains.
- 4. Please mention "Yes" if assessed to tax under the provisions of Income-tax Act, 1961 for any of the assessment year out of six assessment years preceding the year in which the declaration is filed.
- 5. Please mention the amount of estimated total income of the previous year for which the declaration is filed including the amount of income for which this declaration is made.
- 6. In case any declaration(s) in Form No. 15H is filed before filing this declaration during the previous year, mention the total number of such Form No. 15H filed along with the aggregate amount of income for which said declaration(s)
- 7. Mention the distinctive number of shares, account number of term deposit, recurring deposit, National Savings Schemes, life insurance policy number, employee code, etc.

- **8.** Before signing the declaration/verification, the declarant should satisfy himself that the information furnished in this form is true, correct and complete in all respects. Any person making a false statement in the declaration shall be liable to prosecution under Section 277 of the Income-tax Act, 1961 and on conviction be punishable: -
 - (i) in a case where tax sought to be evaded exceeds twenty-five lakh rupees, with rigorous imprisonment which shall not be less than six months but which may extend to seven years and with fine; and
 - (ii) in any other case, with rigorous imprisonment which shall not be less than three months but which may extend to two years and with fine.
- 9. The person responsible for paying the income referred to in column 15 of Part I shall allot a unique identification number to all the Form No. 15H received by him during a quarter of the financial year and report this reference number along with the particulars prescribed in rule 31A(4)(vii) of the Income-tax Rules, 1962, in the TDS statement furnished for the same quarter. In case the person has also received Form No.15G during the same quarter, please allot separate series of serial number for Form No.15H and Form No.15G.
- 10. The person responsible for paying the income referred to in column 15 of Part I shall not accept the declaration where the amount of income of the nature referred to in section 197A(1C) or the aggregate of the amounts of such income credited or paid or likely to be credited or paid during the previous year in which such income is to be included exceeds the maximum amount which is not chargeable to tax after allowing for deduction(s) under Chapter VI-A, if any, or set off of loss, if any, under the head "income from house property" for which the declarant is eligible. For deciding the eligibility, he is required to verify income or the aggregate amount of incomes, as the case may be, reported by the declarant in columns 15 and 17.

[Provided that such person shall accept the declaration in a case where income of the assessee, who is eligible for rebate of income-tax under section 87A, is higher than the income for which declaration can be accepted as per this note, but his tax liability shall be nil after taking into account the rebate available to him under the said section 87A.]

1. Inserted by Income-tax (4th Amendment) Rules, 2019, w.e.f. 22-5-2019.

Annexure - III

Date:

Lupin Limited Kalpataru Inspire, 3rd Floor, Off. Western Expressway Highway, Santacruz (East), Mumbai - 400 055

Subject: Declaration regarding Category and Beneficial Ownership of equity shares

Ref: PAN - << Please mention your permanent account number (unique identification number) provided by the IndianTax Authority, if any>>

Authority, if any>>
Folio Number/DP ID/Client ID -
With reference to the captioned subject and in relation to the appropriate withholding of taxes on the Dividend payable tme/us by Lupin Limited (the Company), I/We hereby declare as under: -
I/We, < <full member="" name="" of="" the="">><<number of="" shares="">>, holding equity share(s) of the Company, hereby declare that I am/we are tax resident of India for the period April 2022-March 2023 (Indian Fiscal Year).</number></full>
We hereby declare that (Select Applicable)
We are Insurance Company and are the beneficial owner of the equity share(s) held in the Company; and we are submitting self-attested copy of PAN card.
We are Mutual Fund specified in Section 10(23D) of the Income-tax Act, 1961 (Act) and are the beneficial owner of the equity share(s) held in the Company; and we are submitting self- attested copy of PAN card and registration certificate.
We are Alternative Investment fund (AIF) established in India and are the beneficial owner of the equity share(s) held in the Company; and our income is exempt under Section 10(23FBA) of the Act and are governed by Securities and Exchange Board of India regulations as Category I or Category II AIF; and we are submitting self-attested copy of the PAN card and registration certificate.
We are < <category entity="" of="" the="">> and are the beneficial owner of the equity share(s) held in the Company; and are not subject to withholding tax under Section 196 of the Act and we are submitting self-attested copy of the documentary evidence supporting the exemption status along with self-attested copy of PAN card.</category>
We are specified person < <mention by="" category="" mentioned="" of="" person="" provision="">> in terms of Section 10(23FE) and are the beneficial owner of the equity share(s) held in the Company; and our income is exempt under Section 10(23FBA) of the Act and we are submitting self-attested copy of the documentary evidence supporting the exemption status along with self-attested copy of PAN card.</mention>
I/We further indemnify the Company for any consequences arising out of any acts of commission or omission initiated by the Company by relying on my/our above averment.
I/We hereby confirm that the above declaration should be considered to be applicable for all the equity shares held in the Company under PAN/accounts declared in the form.
Thanking you.
Yours faithfully,
For < <name member="" of="" the="">></name>
Authorised Signatory

Annexure - IV

Name of the Company Lupi		Lupin Limi	n Limited	
DP ID - Client ID/Folio No.				
FORM NO. 10F [See Sub-rule (1) of Rule 21AB] Information to be provided under Sub-section (5) of Section 90 or Sub-section (5) of Section 90A of the Income-tax Act, 1961				
I				
SI. No.	Nature of information			Details #
(i)	Status (individual, company, firm etc.) of the assessee.		:	
(ii)	Permanent Account Number or Aadhaar Number of the assessee if allotted.		:	
(iii)	Nationality (in the case of an individual) or Country or specified territory of incorporation or registration (in to of others).		:	
(iv)	Assessee's tax identification number in the country or territory of residence and if there is no such number, tunique number on the basis of which the person is ide by the Government of the country or the specified ter which the assessee claims to be a resident.	then, a entified	:	
(v)	Period for which the residential status as mentioned in certificate referred to in Sub-Section (4) of Section 90 Section (4) of Section 90A is applicable.		:	
(vi)	Address of the assessee in the country or territory out India during the period for which the certificate, ment (v) above, is applicable.		:	
I have obtained a certificate referred to in Sub-section (4) of Section 90 or Sub-section (4) of Section 90A from the Government of(name of country or specified territory outside India)				
Name: Addre	ss: nent Account Number or Aadhaar Number:			
Verification				
Ido hereby declare that to the best of my knowledge and belief what is stated above is correct, complete and is truly stated.				
Verified today the day of				

Notes:

1. *Delete whichever is not applicable.

Place:

2. #Write N.A. if the relevant information forms part of the certificate referred to in Sub-section (4) of Section 90 or Sub-section (4) of Section 90A.

Signature of the person providing the information

Annexure - V

<<Date>>

Lupin Limited

Kalpataru Inspire, 3rd Floor, Off Western Express Highway, Santacruz (East) Mumbai - 400 055 **India.**

Dear Sir/Madam,

Re.: Self declaration for Indian Financial Year (FY) 2022-23 with respect to availment of Tax treaty benefits in relation to receipt of dividend income from Lupin Limited.

This is to certify that: -

- I/We,<<Full name of the shareholder>>,having permanent account number (PAN) under the Indian Income Tax Act, 1961 (Act) - <<mention PAN>>, am/are tax resident of <<country name>> and eligible to claim benefits of the India -<<country name>> Double Tax Avoidance Agreement (DTAA), read with the provisions laid down in the Multilateral Instrument (MLI), wherever applicable;
- 2. The claim of benefits of DTAA by <<Full name of the shareholder>> is not impaired in any way;
- **3.** As per the requirement of the relevant provisions of the above referred DTAA, I/we am/are the beneficial owner(s) of the aforesaid shares as well as the dividend arising from such shareholding;
- 4. 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;
- 5. I/We do not have any Permanent Establishment (PE) or fixed base in India in FY 2022-23 as construed under relevant Articles of the applicable tax treaty nor do we have any PE or business connection in India as construed under the relevant provisions of the Act. I/We further confirm that I/We do not have any business connection in India as per provisions of the Act. In the event of I/We having a PE in India or Dividend income is attributable/effectively connected to such PE, I/We acknowledge our obligation to inform you forthwith with necessary details:
- 6. I/We hereby declare that the investments made by me/us in the shares of Lupin 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 DTAA between India and <<country name>>: and
- 7. Further, our claim for relief under the DTAA is not restricted by application of Limitation of Benefit clause, if any, thereunder.

This declaration is valid for the period 1 April 2022 to 31 March 2023.

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 consideration that may arise in India on the dividend income to be received from the Company.

Thanking you,

Yours Sincerely,

For <Name of the Shareholder>

Name: <insert authorised person name> </ri>