

Declaration for Non-resident Shareholders

(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 Tax Treaty with India and the Multilateral Instrument)

To,

GE Power India Limited
Unit No 211-212, 2nd Floor,
The Capital, G Block, Plot No. C-70,
Bandra Kurla Complex, Bandra East,
Mumbai - 400051

I/We, [.....] do hereby solemnly declare as follows:

- a. That I/ We are non-resident of India as per the provisions of section 6 of the Income Tax Act,1961 ('Act') and I / we do not have and will not have a Place of Effective Management in India as per section 6(3)(ii) of the Act during the financial year 2020-21.
- b. I/We, am/are a resident in [.....*name of country of which shareholder is tax resident*]. I/We am/are eligible to be governed by the provisions of the tax treaty between India and [.....*name of country of which the shareholder is tax resident*] and meet all the necessary conditions to avail the benefits under the said tax treaty.
- c. I am/We are the beneficial owner of the investments made by me/us in in the shares of GE Power India Limited and also any income receivable by me/us from such investments, for an uninterrupted period of 365 days prior to and including the date of payment of the dividends.
- d. I / We do not have a Permanent Establishment (PE) / fixed base in India; or dividend income receivable by me/us from investment in the shares of GE Power India Limited is not attributable/effectively connected to any PE / fixed base in India.

Further, I/We do not have a Business Connection in India according to the provision of section 9(1)(i) of the Act and the amounts paid/payable to us, in any case, are not attributable to business operations, if any, carried out in India.

- e. That the investments made by me/us in the shares of GE Power India 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 tax treaty between India and [.....*name of country of which the shareholder is tax resident*]

- f. I, being an individual, am a qualified person pursuant to Article 9(a) of the Multilateral Instrument. or, we hereby declare that we are a qualified person as defined through paragraphs 9 to 13 to Article 7 of the Multilateral Instrument. The specific paragraph under which I/we am/are a qualified person is paragraph[9(b)/(c)/(d)/(e); 10; 11; or 12]

I/We undertake to intimate GE Power India Limited immediately in case of any alteration in the aforesaid declaration.

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

(Name, designation & signature of Non-resident Shareholder)

Company Seal (if applicable)

Date:

Place:

Address:

Email and Telephone:

Tax identification number (country of residence):

Note: Strike through the text which is not applicable.