

25 April 2024

NO PERMANENT ESTABLISHMENT IN INDIA DECLARATION

This is to certify that

1. Social Beatles Pte. Ltd. is a corporate body incorporated and registered in Singapore under the laws of Singapore.
2. We confirm that we are a tax resident of Singapore and are eligible to claim benefits of the India - Singapore Double Tax Avoidance Agreement (DTAA), read with the provisions laid down in Multilateral Instrument (MLI), wherever applicable.
3. Our Tax Identification Number issued by Accounting & Corporate Regulatory Authority (ACRA) of Singapore is 202341207N
4. We are the beneficial owner of the shares allotted in above folio no. as well as of the dividend arising from such shareholding. .
5. We further declare that we have the right to use and enjoy the dividend 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. We either do not have a Permanent Establishment (P.E.) in India or Dividend income earned by us in not attributable/effectively connected to the our P.E. in India as defined under the Income Tax Act, 1961 and DTAA between India and Singapore during the financial year 2024-25.
7. We further confirm that we do not have any business connection in India as per provisions of Income Tax Act 1961. In the event of we having a P.E. in India or Dividend income is attributable/effectively connected to such P.E, we acknowledge our obligation to inform you forthwith with necessary details.



Vaibhav Pandirkar

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