

(On letterhead of the Recipient of Income)

Declaration dated:

To,

NXTDIGITAL LIMITED
(Formerly known as Hinduja Ventures Limited)
IN CENTRE, 49/50, MIDC, 12th Road,
Andheri (East),
Mumbai - 400093

Dear Sir,

In the context of enabling NXTDIGITAL Limited, to comply with its withholding tax obligations, under the provisions of Indian Income-tax Act, 1961, if any, we hereby confirm as under:

1. We qualify as a tax resident of _____ and my Place of Effective Management is situated in _____ in terms of Article 4 of the Double Tax Avoidance Agreement between India and Mauritius ("DTAA") and do not qualify as a 'resident' of India under section 6 of the Indian Income-tax Act, 1961
2. Our/My Tax Identification Number is _____
3. I/We confirm that I/we are entitled to claim benefits under the India – _____ DTAA as modified by the Multilateral Instrument ('MLI'), (wherever applicable) and that all its relevant provisions of the MLI are fulfilled including the "Principal Purpose Test" in order to implement tax treaty related measures to prevent base erosion and profit shifting signed by India and (country). We hereby further confirm that obtaining the benefit of the DTAA by way of lower withholding tax on dividend, is not one of the principal purposes of the arrangement or transaction that resulted directly or indirectly in that benefit.
4. I/We do not have and do not foresee to have a Permanent Establishment ('PE') in India as defined in Article 5 of the India (country) DTAA (read with the amendments made by MLI) I/We do not have any business connection in India as per the Indian Income- tax Act, 1961 and do not carryout any operations in India.
5. As required to claim the benefits of the lower tax rate under the applicable tax treaty in relation to the dividend income to be received by me from the Company, I/We specifically confirm that I/We am/are the beneficial owner of the equity shares of the Company and the dividend income receivable from the Company in relation to the said shares.
6. 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.
7. Further, my/our claim for relief under the tax treaty is not restricted by application of Limitation of Benefit clause, if any, thereunder.

8. My/Our Permanent Account Number in India is _____.

9. This declaration is valid for the period 1 April 2021 to 31 March 2022.

I/We hereby certify that the declarations made above are true and bonafide. In case in future, a business connection is constituted in India or operations are undertaken by me/us or by another person on our behalf in India either on account of the aforesaid Agreement or otherwise, during the subsistence of the Agreement, we undertake to promptly intimate you of the said event.

In the event that any of the conditions above are found to have not been satisfied or there is misrepresentation of facts by me/us and the Indian tax authorities do not allow the benefit under the DTAA as modified by MLI, I/We shall indemnify NXTDIGITAL Limited for any additional tax recoverable under the Income-tax Act, 1961, on account of lower withholding of taxes by NXTDIGITAL Limited along with applicable interest and penalties, if any.

Signature