1 January 2020

**SWIFT: Permanent Establishment Letter**

This is to certify that 'S.W.I.F.T.' scrl (Society for Worldwide Interbank Financial Telecommunication), hereafter "the Company":

1. The Company is a body corporate with limited liability registered in Belgium under Belgian law;

2. The Company registered address is Avenue Adèle, 1 at 1310 LA Hulpe;

3. The Company is a non-resident of India in the meaning of the Income tax Act 1961 for the year 2020;

4. The Company is tax resident of Belgium within the meaning of the Tax Treaty preventing double taxation between Belgium and **India** (hereafter the "Treaty") for the year 2020 and therefore entitled to the benefits of the Treaty;

5. The Company Belgian Tax Identification Number issued by "La Banque Carrefour des Entreprises" is 0413 330 856;

6. The Company has neither a Permanent Establishment ("PE") nor a fixed base of business in **India** as defined under Article 5 of the Treaty from which it derives its income;

   The income of which the Company is the beneficial owner is not attributed to any Permanent Establishment (as defined under Article 5 of the above Treaty) in India in terms of Article 7 of the Treaty;

   In the event of our coming to have a PE in **India**, we would inform you forthwith, the fact of the PE in **India** and the address;

7. The Company is the beneficial owner of the income as defined under Article **7** of the Treaty between Belgium and **India**

8. The company has the following Indian Income Tax Permanent Account Number (PAN): **AATCS8022J.**

For S.W.I.F.T. scrl

Frederic Herman

Head of Tax

**S.W.I.F.T. SCRL**
Avenue Adèle 1
B -1310 La Hulpe
Belgium
Tel. +32 2 655 31 11
Fax +32 2 655 32 26
swift.com

VAT BE 0413.330.856 - RPM Nivelles