

## **Annexure 2**

Date:

To,

Kirloskar Brothers Limited,  
Pune.

### **Sub: Declaration regarding Tax Residency and Beneficial Ownership of shares**

**Ref: PAN –** *(Please specify PAN of Shareholder)*

**Folio Number / DP ID/ Client ID –** *(Please specify all the account details)*

With reference to the captioned subject, and in relation to the appropriate withholding of taxes on the Dividend payable to me / us by **Kirloskar Brothers Limited** ('the Company'), I / We hereby declare as under:

1. I / We, *( Full name of the shareholder, )* holding share/shares of the Company as on the record date, and I am/We are a tax resident of the \_\_\_\_\_ *(Country of Residence)* within the meaning of Article 4 of the Agreement (or any other relevant article under DTAA) for Avoidance of Double Taxation (DTAA) between India and \_\_\_\_\_ *(Country of Residence)*, read with the provisions laid down in Multilateral Instrument ('MLI'), as applicable. Our place of central management and control as well as place of effective management is in \_\_\_\_\_ *(Country of Residence)*. Hence, we are eligible to avail benefits of DTAA between India and \_\_\_\_\_ *(Country of Residence)*.
2. I / We hereby declare that, I am /we are the beneficial owner of the share/shares held in the Company as well as the dividend arising from such shareholding; and 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.
3. Our taxpayer identification number / unique number in \_\_\_\_\_ *(Country of Residence)* is \_\_\_\_\_.
4. I/We confirm that I/we are entitled to claim the benefits under the Treaty as modified by the multilateral convention to implement tax treaty related measures to prevent base erosion and profit shifting (MLI) including but not limited to the Principal Purpose Test (PPT), limitation of benefit clause (LOB), Simplified Limitation of Benefits (SLOB), period of holding of shares etc. as applicable.
5. I/We confirm that I/we do not have any business connection in India within the meaning of section 9 of the Income Tax Act, 2025 ("the Act"). Further, I/We confirm that I/We do not constitute significant economic presence within the meaning of section 9 of the Act.
6. I/We hereby confirm that we have not entered into the arrangement or transaction for the main purpose of obtaining tax treaty benefits under the treaty, directly or indirectly, where the Principal Purpose or Main Purpose of the arrangement or transaction is not treaty shopping related so as to obtain a tax advantage. Benefit if at all obtained is in accordance with the object and purpose of the treaty, with commercial substance.

7. I/We hereby furnish a copy of valid Tax Residency Certificate dated \_\_\_\_\_ having Tax Identification number \_\_\_\_\_ issued by \_\_\_\_\_ along with an acknowledged copy of e-Form 41 duly filled and signed for the period April 2026 – March 2027. Our tax residency certificate number is \_\_\_\_\_.
8. Our Indian Income Tax registration number, i.e. Permanent Account Number (PAN) is \_\_\_\_\_/ We are not registered with Indian income tax department and hence, do not have PAN in India.
9. I/We do not have any Permanent Establishment ("PE") in India as per the provisions of Income Tax Act, 2025 and as per Article 5 read with Article 7 of DTAA between India and \_\_\_\_\_ (*Country of Residence*) read with provisions as laid down in MLI, wherever applicable.
10. I/We confirm that I/We have not entered into an impermissible avoidance arrangement i.e. an arrangement, the main purpose or one of the main purposes of which is to obtain a tax benefit and it (a) creates rights, or obligations, which are not ordinarily created between persons dealing at arm's length (b) results, directly or indirectly, in the misuse, or abuse, of the provisions of this Act (c) lacks commercial substance or is deemed to lack commercial substance under section 180 of the Income Tax Act, 2025, in whole or in part; or (d) is entered into, or carried out, by means, or in a manner, which are not ordinarily employed for bona-fide purposes.
11. I/We undertake to provide all necessary documents and reasonable assistance to Kirloskar Brothers Limited as and when required by them in connection with any proceedings before the Indian Revenue Authorities.
12. I/ We confirm that the above declaration is true and correct and is applicable for Tax Year 2026-27. In case of any misrepresentation or false documentation provided / made by us, we shall indemnify Kirloskar Brothers Limited as well as any other person who places reliance on these declaration / documents to the extent of taxes and other liabilities that may be levied on Kirloskar Brothers Limited and / or such other person by the Indian Revenue Authorities.
13. I/We confirm that the declaration / facts / documents provided above are true and correct and shall be applicable for the Tax Year 2026-27. I/We undertake to intimate Kirloskar Brothers Limited if there are any changes in the above fact during Tax Year 2026-27.
14. I/We hereby confirm that the above declaration should be considered to be applicable for all the shares held in the Company under PAN/ accounts declared in the form.

The shareholders are required to provide a Declaration strictly as per the specified format given above, failing which the Company reserves the right to deny the Treaty benefits.

Thanking you,  
Yours faithfully,

For (Name of the shareholder)

<<insert signature>>

Authorised Signatory: *Name and designation*

Contact address: *[Please insert]*

Email address: *[Please insert]*

Tax Identification Number: *[Please insert]*

**Note:** *Kindly strikethrough whichever is not applicable*

(\*In case of any Authorised Signatory being other than Director/ Managing Director, please attach the valid Power of Attorney authorising the individual as an Authorised Signatory)

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