

ON THE LETTER HEAD

[FORMAT FOR PERMANENT ESTABLISHMENT CERTIFICATE]

Dear Sir,

This is to certify that

- We M/s _____ are >> individual or sole proprietor or partnership firm or limited company >> registered/incorporated under the laws of _____
- We are liable to tax in _____. Our tax registration number is _____
- We are tax resident of _____ within the meaning of Article 5 of DTAA entered in to between India and _____.
- We are **entitled/not entitled** to the benefits of the DTAA entered into between India and _____
- We **have / do not have any** Permanent Establishment in India within the meaning of Article 5 of the DTAA.
- We **have / do not have any** office or establishment or fixed place of business in India.

Thanking you,

Yours faithfully,

(Stamp & Signature)

In case the Bidder has any Permanent Establishment in India within the meaning of Article 5 of the DTAA,

OR

the Licensor has any office or establishment or fixed place of business in India,

ON THE LETTER HEAD

Dear Sir,

This is to certify that

(a) Whether M/s has any Permanent Establishment (PE) in India through which M/s is directly or indirectly carrying on activity of supply under PO No: placed by M/s Hindustan Petroleum Corporation Limited on M/s

YES/NO

(b) Whether the remittance vide PO No: placed by M/s Hindustan Petroleum Corporation Limited on M/s is attributable to or connected with such Permanent Establishment (PE)

YES/NO

(c) If the reply to Item no. (b) above is "Yes" the amount of Income comprised in such remittance which is liable to tax in India Amount in INR.....

(d) If the reply to Item no. (b) above is "NO" the reasons in brief thereof.

Thanking you,

Yours truly,

(Stamp & Signature)

**In case the Bidder does not have any Permanent Establishment in India within the meaning
of Article 5 of the DTAA,**

ON THE LETTER HEAD

Subject : No Permanent Establishment Certificate
Ref : PO No : _____ Dt _____

Dear Sir,

This is to certify that M/s _____ is a tax resident of _____ and does not have any Permanent Establishment in India as per the provisions of Article 5 of the DTAA between India and _____ in respect of the services to be rendered under the captioned Agreement entered into with your company.

We also clarify that we do not carry on any business through any agent by a Permanent Establishment in India with regard to the above.

Yours truly,
For M/s

(Stamp & Signature of Bidder)