



T-SYSTEMS INTERNATIONAL GMBH

P.O. Box 71 02 45, 60492 Frankfurt am Main, Germany

To whom it may concern

REFERENCE TXT-14
CONTACT Rita Bilawer, Transaction Tax
PHONE +48 228 181 83202
DATE Financial Year 2017
RE India - T-Systems International GmbH

We hereby confirm that

- T-Systems International GmbH, Hahnstrasse 43d, 60528 Frankfurt am Main, Germany, is a Company registered under the laws of Germany.
- T-Systems International GmbH is a tax resident of Germany during the period 1 January 2017 till 31 December 2017 in terms of Article 4 of the Double Taxation Avoidance Agreement between India and Germany.
- T-Systems International GmbH is eligible to claim the benefits under the Double Taxation Avoidance Agreement between India and Germany during the 1 January 2017 till 31 December 2017.
- T-Systems International GmbH does not have a Permanent Establishment or dependent agent in India during the period 1 January 2017 till 31 December 2017 in terms of Article 5 read with Article 7 of the Double Taxation Avoidance Agreement between India and Germany.
- The company does not have any business connection in India as per Sec. 9 (1) of the Indian Income Tax Act 1961 through which business is carried on in India.
- T-Systems International GmbH has obtained a permanent account number (PAN) in India from Indian tax authorities and our PAN is AACCT3552H.
- T-Systems International GmbH is the beneficial owners of receipts in the nature of Royalty and/or Fees for technical services/ included services paid/ to be paid by you.
- T-Systems International GmbH solemnly declares that the information given above is true to the best of our knowledge and belief and no relevant information has been concealed.

T-SYSTEMS INTERNATIONAL GMBH

Address: Hahnstraße 43d, 60528 Frankfurt am Main, Germany

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Phone: +49 69 20060-0 | Fax: +49 69 20060-4664 | E-mail: info@t-systems.com | Internet: www.t-systems.com

Supervisory Board: Thomas Dannenfeldt (Chairman) | Board of Management: Reinhard Clemens (Chairman), Patrick Molck-Ude,

Georg Pepping, Christoph Ahrendt, Anette Bronder

Commercial register: Amtsgericht Frankfurt am Main HRB 55933, registered office Frankfurt am Main | VAT identification no. DE118645675

WEEE reg. no. DE50335567

For T-Systems International GmbH,



T-Systems International GmbH
Group Headquarters
Tax Department
Friedrich-Ebert-Allee 140
53113 Bonn



Rita Bilawer
Transaction Tax