



We take it personally



30 June 2023

Dear Valued Customer

Declaration in accordance with Section 206AB /206CCA of the Income Tax Act, 1961 ("the Act")

1. We, OOCL (India) Private Limited, are shipping agent of **OOCL (Europe) Limited** (hereinafter referred to as "OEUL") in India and are duly authorized to give this declaration on its behalf. OEUL's Permanent Account Number ("PAN") is AABCO9506D.
2. OEUL is registered and incorporated under the laws of United Kingdom and is a non-resident shipping company.
3. Further, OEUL **does not have a permanent establishment in India.**
4. At the outset, the Company would like to submit that the provision of Section 206AB and Section 206CCA of the Act is not applicable in case of OEUL in view of the following-
 - a. As per the proviso to Section 206AB and also 206CCA of the Act, the provision of these sections are not applicable in case of a non-resident which does not have permanent establishment in India.
 - b. Since OEUL is a non-resident shipping company, provisions of Section 172 of the Act applies to it. As per Circular No. 723 dated 19 September 1995 issued by CBDT, Section 194C and Section 195 of the Act does not apply in cases where provisions of Section 172 of the Act is applicable. Accordingly in respect of payments made to OEUL, no taxes are required to be withheld either under Section 194C or Section 195 of the Act.

In view of the above, the provisions of Section 206AB /206CCA of the Act does not apply to OEUL.

5. Without prejudice to the above legal position regarding non-applicability of provisions of Section 206AB /206CCA of the Act to OEUL, we hereby confirm the following-
 - a. OEUL has filed its Income Tax Returns ("ITRs") for Financial Year ("FY") 2020-21 and FY 2021-22 as per details given below:

Relevant Year	Whether Filed	ITR Form No.	ITR Filing Date	Acknowledgement No.
FY 2020-21 (AY 2021-22)	Yes	ITR-6	14 Mar 2022	343514600140322
FY 2021-22 (AY 2022-23)	Yes	ITR-6	23 Nov 2022	816377661231122

- b. OEUL will file its ITR for FY 2022-23 (AY 2023-24) within the relevant due date.

For and on behalf of
OOCL (India) Private Limited (PAN: AAACO5785D)

(As Agent for OOCL (Europe) Limited)

OOCL (INDIA) PRIVATE LIMITED

ICC Chambers, 5th Floor, Saki vihar Road, OPP. Santogen Silk Mills, Powai, Mumbai 400 072.

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An OOIL Group Company

CIN :U63032MH2003PTC138723