

April 01, 2023

TO WHOMSOEVER IT MAY CONCERN

We, OOCL (India) Private Limited, are shipping agents for "OOCL (Europe) Limited".

We hereby confirm that, "OOCL (Europe) Limited" is a company incorporated under the laws of United Kingdom. "OOCL (Europe) Limited" is involved in the business of international ocean going containerized services. "OOCL (Europe) Limited" raises invoices and collects payments in its own favour.

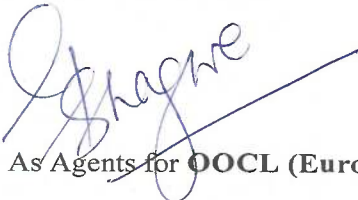
We further confirm that, as per the provisions of Income Tax Act, 1961 ('the Act'), "OOCL (Europe) Limited" residential status is "Non-Resident".

"OOCL (Europe) Limited" are regularly filing returns of income based on the provision of section 172 of the Act for the freight charges, handling charges and any other amount of a similar nature charged, in respect of goods shipped at any port in India. We hereby confirm that entire amount payable by you to "OOCL (Europe) Limited" towards freight and other charges mentioned above for the financial year 2023 – 2024 shall be included in the returns to be filed by "OOCL (Europe) Limited" u/s 172 of the Act and the applicable taxes thereon has been or shall be paid.

In view of the above as well as clarification given by Central Board of Direct Taxes (CBDT), vide its Circular No 723 dated 19th September, 1995, the provisions of Section 194C or Section 195 of the Act, for deduction of tax at source shall not apply in respect of freight charges, handling charges and any other amount of a similar nature paid by you to "OOCL (Europe) Limited". Accordingly, no tax at source from the above mentioned payments may kindly be deducted.

Thanking You,

Yours faithfully,
For **OOCL (India) Pvt. Ltd.**



As Agents for **OOCL (Europe) Limited**

OOCL (INDIA) PRIVATE LIMITED

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 An OOIL Group Company

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