

Annexure 5

DECLARATION FOR NON-RESIDENT SHAREHOLDERS

Date: xxxxxxxx

To,
Aries Agro Limited

Subject: Declaration regarding Tax Residency and Beneficial Ownership of shares

Folio Number / DP ID/ Client ID - _____ (Mention all account details)

With reference to the captioned subject, and in relation to the appropriate withholding of taxes on the amount of dividend payable to me / us by Aries Agro Limited, 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, hereby declare that I am / we are tax resident of _____ (country name) for the period April 2026-March 2027 (Indian Fiscal Year) as contemplated in Article 4 as per tax treaty between India and _____ (country name) (hereinafter referred to as 'said tax treaty') as modified by the "Multilateral Instrument (MLI)".
2. I/We will continue to maintain the 'tax resident' status in the above Country for the application of the provisions of the India- _____ (Country of Residence) DTAA, during the tax year 2026-27.
3. I / We do not have and will not any taxable presence, Permanent Establishment ('PE') or fixed base in India as construed under relevant Articles of the said tax treaty during the period April 2026 - March 2027.

Or

I /We have PE or fixed base in India during the period April 2026 - March 2027 as construed under relevant Articles of the applicable tax treaty and the dividend income receivable by me/us from investment in the shares of _____ is not effectively connected to said PE in India.

4. We do not /will not have any business connection in India within the meaning of section 9(2) of the Income-tax Act, 2025 during the period April 2026 - March 2027.
5. I/We confirm that we do not/ will not have our Place of Effective Management in India during the period April 2026 - March 2027.

On the letterhead of Non-resident shareholder

6. 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. 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.
7. 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.
8. I/We specifically confirm that my affair / affairs were not arranged such that the main purpose or the principal purpose thereof was to obtain tax benefits available under the applicable tax treaty.
9. I / We declare that I am/We are the beneficial owner of the investments made by me/us in the shares of _____ for an uninterrupted period of 365 days prior to and including the date of payment of the dividend.
10. I/We hereby furnish a copy of valid Tax Residency Certificate dated _____ having Tax Identification number _____ issued by _____ along with a copy of Form 41 generated electronically from the e-filing portal of the Income Tax Department, India for the period April 2026-March 2027.
11. 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, 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.
12. I / We hereby declare that <<Relevant Article>> Limitation of Relief under India<<Country Name>> Double Taxation Avoidance Agreement (DTAA) shall not be applicable with respect to dividend received/ receivable from the above shares and supported by letter issued by the competent authority or any other evidence demonstrating the non-applicability of <<Relevant Article >>- Limitation of Relief under India-<<Country Name>>DTAA. << Required in case of shareholder being tax resident of <<Country name >>.
13. I/ We further indemnify the Company for any tax liability (including interest and penalty) that may arise on the Company in future on account of non-deduction / short deduction of tax at source based on the above declaration/ documents furnished by me/us.
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.

On the letterhead of Non-resident shareholder

15. I _____ (Full Name of the Shareholder) hereby declare that the contents above are correct, complete and truly stated.

16. This declaration is valid for the period April 1, 2026 to March 31, 2027.

I/We undertake to intimate the Company immediately in case of any change in the aforesaid declaration.

Thanking you.

Yours faithfully,

For _____ (Name of the Shareholder)

Authorized Signatory Name:

Designation:

Contact address:

Email address:

Contact Number:

Note: Kindly strikethrough whichever is not applicable

< 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.>