



Asia Pacific Network Information Centre

APNIC Pty Ltd

ABN: 42 081 528 010

6 Cordelia Street

PO Box 3646

South Brisbane

QLD 4101 AUSTRALIA

URL www.apnic.net

Enquiries helpdesk@apnic.net

Accounts billing@apnic.net

Phone +61 7 3858 3100

Fax + 61 7 3858 3199

Date: 13 July 2026

TO WHOM IT MAY CONCERN

APNIC Pty Ltd ("**APNIC**") hereby confirms and declares that:

- APNIC is a tax resident of Australia under Article 4 of the Double Tax Avoidance Agreement between India and Australia ("**Tax Treaty**") dated 30 December 1991, and APNIC is not a 'resident' of India under section 6 of the Income-Tax Act, 2025 of India.
- APNIC does not have a Permanent Establishment (PE) in India under the provisions of Article 5 of the Tax Treaty.
- APNIC is eligible to invoke the provisions of the Tax Treaty in respect of any income derived from India pursuant to the provisions of Article 7 of the Tax Treaty.

Yours faithfully,

A handwritten signature in black ink, appearing to read "N. Harvey", is written over a light blue horizontal line.

Nathan Harvey
Director – Corporate Services
APNIC PTY LTD