**No Permanent Establishment Declaration**

TO WHOMSOEVER IT MAY CONCERN

This is to confirm that **[여행사명 영문기입]** is a tax resident of *Republic of Korea* as per Article 4 of the *Republic of Korea* Tax Treaty. **[여행사명 영문기입]** declares that the services and activities related thereto are performed outside India and is the beneficial owner of all the amounts payable by Air India Limited.

**[여행사명 영문기입]** doesn’t have a permanent establishment in India, as provided for as the term "permanent establishment" is defined in Tax Treaty.

Dated: \_\_\_\_\_\_\_\_\_/\_\_\_\_\_\_/\_\_\_\_\_\_\_

By: \_\_\_\_\_\_대표자 서명\_\_\_\_\_\_\_\_

*Tax Treaty: - For the purpose of this document is defined as Double Tax Avoidance Agreement between [Insert Party’s Country of Residence] and the Republic of India, signed [Insert Relevant Signing Date] including the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting.*