

CERTIFICATE CONFIRMING NO PERMANENT ESTABLISHMENT IN INDIA

20.10.2021

To whoever it may concern.

I, Stefan Kukman, CEO of the CARGOX LTD, company incorporated / established in SLOVENIA, EU and having registered address at CELOVSKA CESTA 136, 1000 LJUBLJANA, SLOVENIA hereby state that:

- a) CARGOX LTD is a valid limited liability company incorporated and resident in Slovenia, EU.
- b) CARGOX LTD is the legal and beneficial owner of the payment received by the payee, **for rendering services towards document transfers on blockchain, verification of companies & users and others**, under the general and special terms and conditions published on the <https://cargox.digital> website and accepted by the payee, that together act as an agreement between payee and CARGOX LTD.
- c) CARGOX LTD does not wholly or partly carry on business in the republic of India through a permanent establishment situated therein, as defined in the India – Slovenia tax convention (Article about Permanent Establishment);
- d) CARGOX LTD does not have a Business Connection in the republic of India, as defined in Explanation 2 to Section 9(1)(i) of the Income Tax Act, 1961.
- e) CARGOX LTD has its main computer server within European Union (Ireland).

For CARGOX LTD.

Name: Stefan Kukman

Designation: CEO

Date: 20.10.2021

Place: Ljubljana, Slovenia, EU

