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Oifig na gCoimisinéirí Ioncaim
An Rannóg Ard-Rachmais agus
Seirbhísí Airgeadais
Radharc an Chaisleáin
52-57 Sráid Sheoirse Mhór Theas
Baile Átha Cliath 2
D02 HF50
Éire

Office of the Revenue Commissioners
High Wealth & Financial Services
Division
Castle View
52-57 South Great George's Street
Dublin 2
D02 HF50
Ireland

14 February 2025

Ref: 9804939D

Re: Dell Bank International DAC

Certificate of Tax Residence for Tax Year 2025

Dear Sir/Madam,

For the purposes of the tax treaties listed below, I confirm that the above-named company is registered for corporation tax in Ireland and files its corporation tax returns, for the year stated above, on the basis that it is resident for tax purposes in Ireland. The company is therefore liable to Irish corporation tax on all of its profits wherever arising, for the said year.

Yours faithfully,

**John Duffy,
Inspector of Taxes,
High Wealth & Financial Services Division**

Revenue Commissioners
High Wealth & Financial Services Division

14 FEB 2025

Castle View
52-57 South Great George's Street
Dublin 2
D02 HF50

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Ireland has signed Double Taxation Agreements / Treaties with the following countries:

Albania, Armenia, Australia, Austria, Bahrain, Belarus, Belgium, Bosnia & Herzegovina, Botswana, Bulgaria, Canada, Chile, China, Croatia, Cyprus, Czech Republic, Denmark, Egypt, Estonia, Ethiopia, Finland, France, Georgia, Germany, Greece, Hong Kong, Hungary, Iceland, India, Israel, Italy, Japan, Kazakhstan, The Republic of Korea, Kosovo, Kuwait, Latvia, Lithuania, Luxembourg, Macedonia, Malaysia, Malta, Mexico, Moldova, Montenegro, Morocco, the Netherlands, New Zealand, Norway, Pakistan, Panama, Poland, Portugal, Qatar, Romania, Russia, Saudi Arabia, Serbia, Singapore, Slovakia, Slovenia, South Africa, Spain, Sweden, Switzerland, Thailand, Turkey, UAE, Ukraine, United Kingdom, USA, Uzbekistan, Vietnam, Zambia.