



Oifig na gCoimisinéirí Ioncain  
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**

**Ireland/Italy Double Taxation Agreement**

Dear Sir/Madam,

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.

The above-named is a resident of Ireland in accordance with Article 3 of the Ireland/Italy Double Taxation Treaty.

Yours faithfully,

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

[hwfsdcertificates@revenue.ie](mailto:hwfsdcertificates@revenue.ie)

Revenue Commissioners  
High Wealth & Financial Services Division

**14 FEB 2025**

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