



An Ceantar Cánach um Sheirbhísí Airgeadais (Baincéireacht)

Rannóg na gCásanna Móra Corparáideacha Radharc an Chaisleáin, 52-57 Sráid Sheoirse Mhór Theas Baile Átha Cliath 2. www.revenue.ie

Financial Services (Banking) Branch Large Corporates Division Castleview, 52-57 South Great Georges Street Dublin 2

Ref: 9804939D

Re: DELL BANK INTERNATIONAL DESIGNATED ACTIVITY COMPANY

Certification of Tax Residence for Tax Year 2024 Ireland/Spain Double Taxation Treaty

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.

Yours faithfully,

John Fitzpatrick Financial Services (Banking) Branch Large Corporates Division Financial Services (Banking) Branch
Large Corporates Division

08/03/2024

Castleview, 52-57 South Great Georges Street Dublin 2