



An Ceantar Cánach um Sheirbhísí Airgeadais  
(Baincéireacht)

Rannóg na gCásanna Móra Corparáideacha  
Teach Ballaugh, 73-79 Sráid an Mhóta íocht  
Baile Átha Cliath 2.

[www.revenue.ie](http://www.revenue.ie)

Financial Services (Banking) Branch  
Large Corporates Division  
Ballaugh House, 73-79 Lower Mount Street,  
Dublin 2

Ref : 9804939D

Re : DELL BANK INTERNATIONAL  
DESIGNATED ACTIVITY COMPANY

Certification of Tax Residence for Tax Year 2023  
Ireland/France 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**

03/01/2023

**Ballaugh House, 73-79 Lower Mount  
Street,  
Dublin 2**