



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

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

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 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**

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, 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.