



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 2021 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,

Joan French Financial Services (Banking) Branch Large Corporates Division Financial Services (Banking) Branch Large Corporates Division

15/07/2021

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