

Certificate confirming no permanent establishment in India

For the financial year 2025/26

To whom it may concern,

I, **Štefan Kukman**, acting in my capacity as **the CEO of CargoX d.o.o.**, a company duly incorporated and existing under the laws of the Republic of Slovenia, having its registered office at **Ameriška ulica 2, 1000 Ljubljana, Slovenia**, hereby certify and confirm that:

- a. **CargoX d.o.o.** is a company duly incorporated and validly existing under the laws of the Republic of Slovenia and is a tax resident of the Republic of Slovenia.
- b. **CargoX d.o.o.** is the legal and beneficial owner of the payment received by the payee, for the FEES FOR DIGITAL COURIER SERVICE under the general and special terms and conditions published on the <https://cargox.digital> website and accepted by the payee, that together act as an agreement between payee and CargoX d.o.o.
- c. **CargoX d.o.o.** does not carry on business in the Republic of India through a permanent establishment, as defined under the Convention between the Republic of Slovenia and the Republic of India for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income.
- d. **CargoX d.o.o.** does not have a business connection in India within the meaning of the applicable provisions of the **Income-tax Act, 2025**.
- e. **CargoX d.o.o.** is entitled to the benefit provided under **Section 397(2)(c) of the Income-tax Act, 2025, read with Rule 217 of the Income-tax Rules, 2026**, and accordingly is not required to obtain or furnish a Permanent Account Number (PAN) in India for the purposes of receiving the above payments, subject to compliance with the applicable requirements of such provisions.

This certificate is issued upon request for the purpose of supporting the tax treatment of payments made to **CargoX d.o.o.** under applicable Indian tax laws.

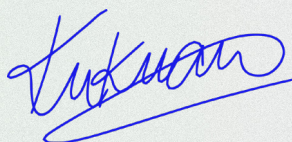
Signed for and on behalf of **CargoX d.o.o.**

Name: Štefan Kukman

Designation: CEO

Date: 24.7.2026

Place: Ljubljana, Slovenia, EU

A handwritten signature in blue ink, appearing to read "Kukman", is written over a blue horizontal line.