



January 25, 2026

2041 East St PMB 833  
Concord, CA 94520  
707-216-1738

Self-declaration for Financial Year (FY) 2026 to avail treaty benefits

Sir/Madam,

With reference to the above referred subject matter I hereby declare as under:

I, Kevin Thornton, Controller of Worldly Holdings, Inc., having Permanent Account Number (PAN) under the Indian Income tax Act, 1961 ('the Act') are a tax resident of **the United States of America**. A copy of the valid tax residency certificate for the period 1<sup>st</sup> January 2026 to 31<sup>st</sup> December 2026, is enclosed herewith.

We are tax resident of the United States of America as defined under Article 3 of the tax treaty between India and the United States of America.

We are eligible to be governed by the provisions of the applicable tax treaty as modified by the "Multilateral Instrument" (MLI) and meet all the necessary conditions to avail the benefits under the applicable tax treaty.

I specifically confirm that affairs of Worldly Holdings, Inc. were arranged such that the main purpose or the principal purpose thereof was not to obtain tax benefits available under the applicable tax treaty.

Further, our claim for relief under the tax treaty is not restricted by application of Limitation of Benefit clause, if any, thereunder.

This declaration is valid for the period 1<sup>st</sup> January 2026 to 31<sup>st</sup> December 2026.

\*I hereby confirm that the declarations made above are complete, true and bona fide.

For Worldly Holdings, Inc.

*Kevin Thornton*

Kevin Thornton  
Controller

