



भारत सरकार/ GOVERNMENT OF INDIA
वित्त मंत्रालय/ MINISTRY OF FINANCE
आयकर विभाग/ INCOME TAX DEPARTMENT
OFFICE OF THE DEPUTY COMMISSIONER OF INCOME TAX
INT TAX CIRCLE 2(2)(2), MUMBAI

सेवा में/ To, HAPAG-LLOYD AKTIENGESELLSCHAFT 403 and 404, SATTELITE GAZEBO, 4TH FLOOR, A WING , GURUHARGOVINJI MARG, CHAKALA Mumbai MUMBAI 400093 , Maharashtra India	
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आस्क पावती संख्या/ ASK ACK No. : 226592110013	दिनांक/ Dated: 02/07/2021	द.प.सं. एवं पत्र संख्या /DIN & Letter No: ITBA/ASK/F/73/2021-22/1033970716(1)
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महोदय/ महोदया/ मेसर्स,
Sir/ Madam/ M/s,
Sub:

Grant of Annual NOC (100% DIT) for your principal **M/s. Hapag - Lloyd AG, Hamburg, Germany for F.Y. 2021-22.**

Ref: i. This office letter No. ITBA/ASK/F/73/2021-22/1032589619(1), dt. 21/04/2021.

ii. Your email dated 01/07/2021 and 28/06/2021

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In continuation to Annual NOC (100% DIT) Certificate issued for your principal, **M/s. Hapag - Lloyd AG, Hamburg, Germany** vide above referred letters filed through its agent in India **M/s. Hapag Lloyd India Pvt. Ltd.** on 28.06.2021, it is certified that shipping income earned by your principal from operation of the following vessel operating in the international traffic, which are either owned or chartered by the principal for transportation of passengers, mail, livestock or goods will be exempt from payment of tax in India and entitled for 100% DIT relief.

Sl. No.	Name of the Vessel	Validity Period
1	SOFIA EXPRESS	31/03/2022
2	NORTHERN DEDICATION	31/03/2022

Note: If digitally signed, the date of digital signature may be taken as date of document.
ROOM NO:1606,16th Floor, AIR INDIA BUILDING, NARIMAN POINT, MUMBAI, Maharashtra, 400021
Email: MUMBAI.DCIT.IT2.2.2@INCOMETAX.GOV.IN, Office Phone:02222040030

Note:- The website address of the e-filing portal has been changed from www.incometaxindiaefiling.gov.in to www.incometax.gov.in.
* DIN- Document identification No.

Further, income earned from feeder vessels, which connect to mother vessel that is not owned, leased, chartered or pooled by **M/s. Hapag - Lloyd AG, Hamburg, Germany** is not covered. This certificate is valid for the above mentioned period unless it is cancelled or modified before the expiry of said period. The fact of cancellation or modification will be intimated to you.

The certificate is being given on an undertaking given by the principal that the vessels(s) referred above will be operated in 'international traffic' only during the currency of this certificate. Further, income earned from feeder vessels, which connect to mother vessel, leased, chartered or pooled by M/s. Hapag-Lloyd AG Hamburg, Germany is not covered under Article 8 of DTAA between India and Germany.

This certificate is provisional in nature and subject to the final assessment.



AMIT SANJAY GURAV
INT TAX CIRCLE 2(2)(2), MUMBAI

(In case the document is digitally signed please refer Digital Signature at the bottom of the page)