NAGAR & NAVADA
CHARTERED ACCOUNTANTS
INDIA

STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO PROGNOSYS MEDICAL SYSTEMS PRIVATE LIMITED AND ITS SHAREHOLDERS UNDER THE APPLICABLE LAWS IN INDIA

To,

The Board of Directors
Molbio Diagnostics Limited ("Company")
Plot No.L-46, Phase II-D Verna Industrial Area,
Verna, Salcete, South Goa, Goa, India, 403722

The Board of Directors
Prognosys Medical Systems Private Limited
No 249, IV Main Road, Chamarajpet,
Bangalore – 560 018

Statement of Special Tax Benefits available to Prognosys Medical Systems Private Limited ("Material Subsidiary") and its shareholders under the applicable Indian tax laws

Dear Sir/Madam,

1. We, Nagar and Navada, Chartered Accountants, have been informed that in connection with the proposed initial public offering of equity shares by the Company (**"Offer"**), the Company proposes to file the red herring prospectus (**"RHP"**) and the prospectus and any other material used in connection with the Offer (together, the **"Offer Documents"**) with SEBI, Stock Exchanges, ROC, as required, in accordance with the provisions of the SEBI ICDR Regulations. We hereby confirm that the enclosed Annexure prepared by Prognosys Medical Systems Private Limited (the **"Material Subsidiary"**) states the special tax benefits available to the Material Subsidiary and its shareholders, under the Income Tax Act, 2025 ('Act') and applicable Rules, as amended (referred to as 'Direct Tax Laws'), Central Goods and Services Tax Act, 2017, Integrated Goods and Services Tax Act, 2017 and State Goods and Services Tax Act, 2017 read with Rules, Circulars and Notifications ('GST Laws'), the Customs Act, 1962, the Customs Tariff Act, 1975, Foreign Trade Policy (FTP), 2023, each as amended and presently in force in India (collectively referred to as 'Indirect Tax Laws' and together with the Direct Tax Laws, "Tax Laws"). These possible special tax benefits are dependent on the Material Subsidiary and/or the shareholders of the Material Subsidiary fulfilling the conditions prescribed under the relevant provisions of the above-mentioned Tax Laws. Hence, the ability of the Material Subsidiary and its shareholders to derive the tax benefits is dependent upon fulfilling such conditions which, based on the business imperatives the Material Subsidiary may face in future, and accordingly, the Material Subsidiary or its shareholders may or may not choose to fulfill.

2. The benefits discussed in the enclosed Annexure are not exhaustive and preparation of the contents stated is the responsibility of the Material Subsidiary's management. We are informed that the Annexure is only intended to provide general information to the investors and hence is neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of the tax consequences, the changing tax laws, each investor is advised to consult his or her own tax consultant with respect to the specific tax implications arising out of their participation in the proposed Offer.

3. We do not express any opinion or provide any assurance as to whether:

i. the Material Subsidiary or its shareholders will continue to obtain these special tax benefits in future; or

ii. the conditions prescribed for availing the special benefits have been / would be met with; or

iii. the revenue authorities / courts will concur with the views expressed herein.

4. The contents of the enclosed Annexure are based on the information, explanations and representations obtained from the Material Subsidiary and on the basis of their understanding of the business activities and operations of the Material Subsidiary.

5. We hereby confirm that while providing this certificate we have complied with the Code of Ethics and the Standard on Quality Control (SQC) 1, Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements, issued by the Institute of Chartered Accountants of India.

6. We confirm that the information in this certificate is true, fair, correct, accurate and there is no untrue statement or omission which would render the contents of this certificate misleading in its form or context and adequate to enable investors to make a well-informed decision as to the investment in the proposed Offer.

7. This statement is issued solely in connection with the Offer, and can be used, in full or part, for inclusion in the Offer Documents which may be filed by the Company with SEBI, Stock Exchanges, RoC and / or any other regulatory or statutory authority.

8. We hereby consent to our name and the aforementioned details being included in the Offer Documents and/or consent to the submission of this certificate as may be necessary, to the SEBI, RoC, Stock Exchanges and/or any other regulatory/statutory authority as may be required and/or for the records to be maintained by the BRLMs in connection with the Offer and in accordance with applicable law and the same can also be uploaded on the document repository platform of the Stock Exchanges/ SEBI as required pursuant to the SEBI circular no. SEBI/HO/CFD-TPD-1/P/CIR/2024/170 dated December 5, 2024 and the subsequent requirements of the Stock Exchanges/ SEBI, as applicable.

9. This certificate may be relied on by the Company, the Material Subsidiary, the BRLMs, their affiliates and the legal counsel to each of the Company and the BRLMs appointed in relation to the Offer and to assist the BRLMs in conducting and documenting their investigation of the affairs of the Company in connection with the Offer. We hereby consent to this certificate letter being disclosed by the BRLMs, if required (i) by reason of any law, regulation, order or request of a court or by any governmental or competent regulatory authority, or on the request of the Stock Exchanges or (ii) in seeking to establish a defense in connection with, or to avoid, any actual, potential or threatened legal, arbitral or regulatory proceeding or investigation or (iii) for the records to be maintained by the BRLMs and in accordance with applicable law.

10. We undertake to immediately communicate, in writing, any changes to the above information/confirmations, as and when: (i) made available to us; or (ii) we become aware of any such changes, to the BRLMs, the Company and the Material Subsidiary until the Equity Shares allotted in the Offer commence trading on the Stock Exchanges. In the absence of any such communication from us, the Company, the Material Subsidiary, the BRLMs and the legal advisors appointed with respect to Offer can assume that there is no change to the information/confirmations forming part of this certificate and accordingly, such information should be considered to be true and correct.

We also consent to the inclusion of this letter as a part of "Material Contracts and Documents for Inspection" in connection with this Offer, which will be available for public for inspection from date of the filing of the RHP until the Bid/Offer Closing Date.

This will remain valid until the consummation of the Offer or withdrawn in writing by us.

We confirm that we do not have any relationship with the Company, its directors, promoter, senior management or its key managerial personnel. Further, we authorize you to include the Report and this letter as a "Material Contract and Document for Inspection" in the Offer Documents, as required and make the Report and this letter available for inspection in accordance with applicable law. We represent that our execution, delivery and performance of this consent has been duly authorised by all necessary actions (corporate or otherwise). We agree to keep the information regarding the Offer strictly confidential.

11. All capitalized terms used but not define herein shall have the meaning assigned to them in the Offer Documents.

For Nagar and Navada
Chartered Accountants
ICAI Firm Registration Number: 015832S

SANDHYA PANDURANGA NAGAR
Digitally signed by SANDHYA PANDURANGA NAGAR
Date: 2026.07.24 16:37:35 +05'30'

Sandhya P Nagar
Partner
Membership Number: 229158
UDIN: 26229158FJYQQD8911

Place: Bengaluru
Date: 24-07-2026

ANNEXURE TO THE STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO PROGNOSYS MEDICAL SYSTEMS PRIVATE LIMITED AND ITS SHAREHOLDERS UNDER THE APPLICABLE DIRECT AND INDIRECT TAX LAWS ("TAX LAWS") IN INDIA

1. Benefits under Income Tax Act, 2025 ("the Act"):

The information outlined below sets out the special tax benefits available to the Material Subsidiary and its shareholders under the Tax Laws in force in India (i.e. applicable for the Financial Year 2025–26 relevant to the Assessment Year 2026–27).

A. Special Tax Benefits Available to the Material Subsidiary

(a) Lower corporate tax rates on income of domestic companies – Section 200 of the Act

Section 200 of the Income-tax Act, 2025 provides an option to a domestic company to be taxed under the concessional tax regime prescribed therein, subject to the fulfilment of the conditions specified under the said section. A domestic company exercising the option under Section 200 is liable to income-tax at the concessional rate of 22%, together with the applicable surcharge and health and education cess, instead of the tax rates otherwise applicable under the normal provisions of the Act.

Further, Section 200 provides that a domestic company opting for the concessional tax regime shall not be liable to pay Minimum Alternate Tax (MAT) under the provisions of the Income-tax Act, 2025. However, such company is required to forgo the specified exemptions, deductions and incentives prescribed under the Act and comply with all the conditions stipulated under Section 200 for availing the concessional tax regime.

In addition, where a domestic company exercises the option under Section 200, any tax credit in respect of MAT available under the Act shall not be available for utilisation thereafter. Further, brought forward losses or unabsorbed depreciation attributable to exemptions, deductions, incentives or additional depreciation that are not allowable under the concessional tax regime cannot be set off while computing the taxable income under the said regime.

The subsidiary has already evaluated and opted for lower corporate tax rate (prescribed under section 115BAA of the Income Tax Act, 1961) under the Income-tax Act, 1961 which is corresponds to the provisions under section 200 of the Income-tax Act, 2025

(b) Deduction in respect of inter-corporate dividends - Section 148 of the Income-tax Act, 2025

Up to 31st March, 2020, any dividend paid to a shareholder by a company was liable to Dividend Distribution Tax ("DDT"), and the recipient shareholder was exempt from tax. Pursuant to the amendment made by the Finance Act, 2020, DDT stands abolished, and dividend received by a shareholder on or after 1st April 2020 is liable to be taxed in the hands of the shareholder. The company is required to deduct Tax at Source ("TDS") at applicable rate specified under the Act read with applicable Double Taxation Avoidance Agreement (if any).

Pursuant to the provisions of Section 148 of the Income-tax Act, 2025, where the gross total income of a domestic company includes income by way of dividends received from

(a) any other domestic company; or

(b) a foreign company; or

(c) a business trust,

a deduction of an amount equal to so much of the income by way of dividends received from such domestic company, foreign company or business trust as does not exceed the amount of dividend distributed by the company at least one month prior to the due date of furnishing the return of income under Section 263(1) of the Income-tax Act, 2025 for the relevant tax year, is allowed.

Further, where a deduction in respect of any amount of dividend distributed by the company to its shareholders has been allowed under the said section for any tax year, no deduction shall be allowed in respect of such amount in any other tax year.

B. Special tax benefits available to the Shareholders

Benefits available to the Resident Shareholders: -

• Dividend income earned by the shareholders would be taxable in their hands at the applicable rates. However, in case of domestic corporate shareholders, deduction under Section 148 of the Income-tax Act, 2025 would be available on fulfilling the conditions, as discussed above. Further, in case of shareholders who are individuals, Hindu Undivided Family, Association of Persons, Body of Individuals, whether incorporated or not and every artificial juridical person, surcharge on tax would be restricted to a maximum of 15% (instead of peak surcharge rate prescribed under the Act) when the total income includes dividend income or income under sections 196 or 198.

Section 198 of Act provides for concessional rate of 12.5% (plus applicable surcharge and cess) on long term capital gains (aggregate exceeding Rs. 1,25,000 in a particular year) arising from equity shares of the Company, if Securities Transaction Tax ('STT') has been paid on both acquisition and transfer of such shares. The benefit of indexation shall not be available for the purpose of computing long-term capital gains taxable under section 198 of Act.

As per the provisions of section 196 of Act, short term capital gain arising from transfer of equity share in the company through a recognized stock exchange and subject to STT shall be taxable at a concessional rate of 20% (plus applicable surcharge and cess).

Benefits available to the Non-Resident Shareholders: -

• As per section 207 of the Act, a non-resident (not being a company) or of a foreign company, includes any income by way of Dividend, the amount of income-tax calculated on the amount of income by way of dividends shall be at the rate of 20%.

• Long-term capital gains arising to non-resident shareholders shall be taxable in accordance with the provisions of Sections 198, 210 and other applicable provisions of the Act, subject to the nature of securities transferred and fulfillment of prescribed conditions.

• Short-term capital gains arising to non-resident shareholders shall be taxable in accordance with the provisions of Sections 196, 210 and other applicable provisions of the Act, subject to the nature of securities transferred and fulfillment of prescribed conditions.

• As per section 214 of the Act, long-term capital gains arising to non-resident Indian income from long term capital gains on specified asset shall be taxed at the rate of 12.5% subject to fulfilment of prescribed conditions under the Act.

• In respect of non-resident shareholders, the tax rates and the consequent taxation shall be further subject to benefits available under the applicable Double Taxation Avoidance Agreement, if any, between India and the country in which the non-resident has fiscal domicile.

2. Benefits under Indirect Tax Laws:

A. Special tax benefits available to the Prognosys Medical Systems Private Limited

(a) Possible Special Indirect Tax Benefits available under the GST Laws
The Material Subsidiary is not availing any special tax benefits or concessions under the provisions of the Goods and Services Tax Act, 2017, except for claiming refunds of unutilized input tax credit under the Inverted Duty Structure in accordance with the applicable provisions of the Act.

(b) Special Indirect Tax Benefits available under Customs Act, 1962 / Foreign Trade Policy
The Material Subsidiary is availing the benefit of concessional customs duty on the import of specified goods in accordance with the provisions of Notification No. 50/2017-Customs, Notification No. 45/2025-Customs, and the Customs (Import of Goods at Concessional Rate of Duty or for Specified End Use) Rules, 2022, as applicable. The list of items eligible for concessional customs duty is set out below:

S. No.	Description of Goods Eligible for Concessional Duty
1	Collimator
2	Monobloc
3	X-ray Grid(F)
4	Flat panel detector
5	X-ray I/F Unit
6	X-RAY TUBE

B. Special tax benefits available to the Shareholders

The Shareholders of the Material Subsidiary are not entitled to any special tax benefits under Indirect Tax Laws.

Notes:

i) The above Annexure of special tax benefits sets out the provisions of Tax Laws in a summary manner only and is not a complete analysis or listing of all the existing and potential tax consequences of the purchase, ownership and disposal of equity shares of the Material Subsidiary.

ii) In respect of non-residents, the tax rates and the consequent taxation mentioned above shall be further subject to any benefits available under the applicable double taxation avoidance agreement, if any, between India and the country in which the non-resident has fiscal domicile.

iii) This Annexure does not discuss any tax consequences in any country outside India of an investment in the shares of the Material Subsidiary. The shareholders/investors in any country outside India are advised to consult their own professional advisors regarding possible income tax consequences that apply to them under the laws of such jurisdiction.

iv) The tax benefits discussed in this Annexure are not exhaustive and are only intended to provide general information to the investors and hence, is neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of the tax consequences and the changing tax laws, each investor is advised to consult his or her own tax advisor with respect to the specific tax implications arising out of their participation in the issue.

v) No assurance is given that the revenue authorities/courts will concur with the views expressed herein. Our views are based on the existing provisions of law and its interpretation, which are subject to changes from time to time. We do not assume responsibility to update the views consequent to such changes. We will not be liable to any other person in respect of this Annexure.

For Prognosys Medical Systems Private Limited

VAJAPEYA M KRISHNA PRASAD

Digitally signed by VAJAPEYAM KRISHNA PRASAD
Date: 2026.07.24 17:37:24 +05'30'

Vajapeyam Krishna Prasad
Managing Director

Place: Bangalore
Date: 24.07.2026