STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO OPTRASCAN, INC. IT'S SUBSIDIARY OPTRASCAN INDIA PRIVATE LIMITED AND THEIR SHAREHOLDERS UNDER THE APPLICABLE LAWS IN UNITED STATES OF AMERICA AND INDIA RESPECTIVELY

To,
The Board of Directors
Molbio Diagnostics Limited
Plot No L -46, Phase II - D Verna Industrial Estate
Verna, Goa - 403722, India

The Board of Directors
OptraScan, Inc.
2001 Gateway PI,
STE 150W, San Jose,
95110, CA, USA

and

OptraScan India Private Limited
Pramila Laxman Complex,
4th Floor, Office No, 401,
Sadhu Vaswani Rd, Pune,
Maharashtra 411001

Date: July 25, 2026

Re: Proposed initial public offering of the equity shares of Molbio Diagnostics Limited (the "Company" and such proposed initial public offering, the "Offer")

Subject: Statement of Special Tax Benefits ("the Statement") available to OptraScan, Inc. ("Material Subsidiary") and it's wholly owned subsidiary OptraScan India Private Limited ("Subsidiary") under United States Tax laws and Indian Tax laws respectively.

We hereby confirm that **Annexure II** and **Annexure IV** set out the special tax benefits available to OptraScan, Inc. and its subsidiary, OptraScan India Private Limited **("the Statement")**, under the applicable direct and indirect tax laws presently in force in the United States of America and India, respectively. The relevant tax laws and the corresponding provisions governing such benefits are described in **Annexure I** and **Annexure III**, respectively.

Certain of these benefits are dependent on the Material Subsidiary and Subsidiary fulfilling the conditions prescribed under the relevant provisions of the Tax Laws and/or other applicable laws. Hence, the ability of the Material Subsidiary and Subsidiary to derive these special tax benefits is dependent upon their fulfilling such conditions, which is based on business imperatives the Material Subsidiary and Subsidiary may face in the future, and accordingly, the Material Subsidiary and Subsidiary may or may not fulfil such conditions.

The benefits mentioned in the enclosed **Annexure II & Annexure IV** are neither exhaustive nor conclusive. It covers only the special tax benefits available to the Material Subsidiary and Subsidiary and does not cover general tax benefits that are available to the Material Subsidiary and Subsidiary respectively.

The benefits mentioned in the enclosed **Annexure II and Annexure IV** are only intended to provide general information to investors and are neither designed nor intended to be a substitute for professional tax advice. Given the individual nature of the tax consequences and the changing tax laws, each investor is advised to consult his or her or its own tax consultant with respect to the specific tax implications arising out of their participation in the proposed Offer, particularly in view of the fact that certain recently enacted legislation may not have a direct legal precedent or may have a different interpretation on the special tax benefits, which an investor can avail. Neither do we suggest, nor do we advise the investors to invest money based on this Statement.

We conducted our examination in accordance with the "Guidance Note on Reports or Certificates for Special Purposes (Revised 2016)" ("Guidance Note") issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India. Our scope of work did not involve performance of any audit test in this context of our examination. Accordingly, we do not express an audit opinion.

We have complied with the relevant applicable requirements of 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.

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

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

ii. the conditions prescribed for availing the special tax benefits where applicable, have been/would be met with, or

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

The contents of the enclosed **Annexures I, II, III and IV** are based on the information, explanation, and representations obtained from the Material Subsidiary and its subsidiary, and on the basis of our understanding of the business activities and operations of the Material Subsidiary and its subsidiary.

We confirm that the information in this Statement is true and correct and there is no untrue statement or omission which would render the contents of this Statement 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.

This Statement is issued for the purpose of the Offer, and can be used, in full or part, for inclusion in the updated draft herring prospectus, the red herring prospectus, the prospectus prepared by the Company in connection with the Offer and any other material prepared/used in connection with the Offer (together, the "**Offer Documents**), which may be filed by the Company with SEBI, BSE Limited ("**BSE**") and National Stock Exchange of India Limited ("**NSE**" and together with BSE, the Stock Exchanges), the registrar of companies, Goa ("**RoC**") and/or any other regulatory or statutory authority.

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 regulatory/statutory authority as may be required and/or for the records to be maintained by the Book Running Lead Managers in connection with the Offer and in accordance with applicable laws.

We consent to the inclusion of our names as "experts" in the Offer Documents as defined under Section 2(38) of the Companies Act 2013 read with the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended, in respect of the Statement issued by us.

This certificate may be relied on by the Company, the Material Subsidiary, the Subsidiary, the Book Running Lead Managers, their affiliates, and the legal counsel to each of the Company and the Book Running Lead Managers appointed in relation to the Offer and to assist the Book Running Lead Managers in conducting and documenting their investigation of the affairs of the Company in connection with the Offer. We hereby consent to this Statement being disclosed by the Book Running Lead Managers, if required (i) by reason of any law, regulation, order or request of a court or by any governmental or competent regulatory authority, or (ii) in seeking to establish a defence in connection with, or to avoid, any actual, potential or threatened legal, arbitral or regulatory proceeding or investigation.

We confirm that we are an independent firm, and are not related to the Company, the Material Subsidiary, the Subsidiary and their Promoters, the members of the Promoter Group, its Subsidiaries, its Directors, its Key Managerial Personnel, and its Senior Management. We further confirm that we are not and have not been engaged or interested in the formation or promotion or management of the Company. We also consent to the inclusion of this certificate as a part of the "*Material Contracts and Documents for Inspection*" in connection with this Offer, which will be available to the public for inspection from the date of the filing of the red herring prospectus until the Bid / Offer Closing Date. This certificate can also be uploaded on the repository portal 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.

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 Book Running Lead Managers and the Company 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 Book Running Lead Managers 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 represent that our execution, delivery and performance of this consent has been duly authorised by all necessary actions (corporate or otherwise).

This will remain valid until the consummation of the Offer or withdrawn in writing by us. We agree to keep the information regarding the Offer strictly confidential.

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

Yours Sincerely,

For M/s Vinay Bhushan & Associates
Chartered Accountants
(Firm's Registration Number: 130529W)

ANKIT AMIT SHAH
Digitally signed by ANKIT AMIT SHAH
Date: 2026.07.25 12:17:35 +05'30'

CA Ankit Shah
Partner
Membership No. 167697

Place: Mumbai
Date: July 25, 2026
UDIN: 26167697PQJTPX2524

ANNEXURE I
LIST OF UNITED STATE OF AMERCIA (USA) TAX LAWS

Sr No.	Details of Tax Laws
1	Internal Revenue Code of 1986 (IRC) - Title 26 of the United States Code (26 USC)
2	Treasury Regulations issued by the U.S. Department of the Treasury

For OptraScan, Inc.

Abhijeet Gholap
CEO, Director

Place: San Jose
Date: July 25, 2026

ANNEXURE II

Statement of Special Tax Benefit available to OptraScan, Inc. ("Company") under tax laws of the United States of America

A. Direct Tax Laws

1. Consolidated US Federal Tax Return:

IRC Section 1501

Privilege to file a consolidated tax return with respect to the US federal income tax imposed by Chapter 1 of Subtitle A of the Internal Revenue Code of 1986, as amended (the "Code"), under Code section 1501, in lieu of separate federal US income tax returns for each relevant US corporation is available to the Company. For certain purposes, such consolidated filing permits the various members of the consolidated group to be treated as a single entity for Federal income tax purposes.

2. Global Intangible Low Taxed Income Deduction:

IRC Section 951A & Sec 250

The Global Intangible Low-Taxed Income (GILTI) Deduction is a key component of the tax reforms introduced by the Tax Cuts and Jobs Act (TCJA) of 2017. Its purpose is to address the issue of U.S. multinational corporations shifting profits to foreign subsidiaries in low-tax jurisdictions. The income inclusion under IRC Section 951A and corresponding deduction under Section 250 is designed to reduce the tax burden on foreign earnings that qualify as GILTI, making the U.S. tax system more competitive with international tax regimes.

The Company and its foreign subsidiaries are classified as Controlled Foreign Corporations ("CFCs"). As part of the Consolidated U.S. Group, each CFC's GILTI is included in the group's gross income on an annual basis. This GILTI income is subject to the standard 21% U.S. Federal Corporate Income Tax rate.

Under Section 250, The Company and its foreign subsidiaries may be eligible for a 50% deduction on their GILTI income inclusion each year, which could effectively reduce the U.S. tax rate on GILTI to 10.5%

Pursuant to the enactment of "The One Big Beautiful Bill Act" (OBBB) which will apply to the Company for GILTI Income from taxable Year beginning April 1, 2026, Key impact is removal of deduction available for Net deemed tangible income return and reduces the deduction available under Section 250 for net CFC Tested Income to 40%, resulting in 12.6% effective tax rate

3. Foreign Tax Credit:

The Foreign Tax Credit (FTC) is a U.S. tax benefit designed to prevent double taxation on income that is taxed both by a foreign country and by the U.S. government. If a U.S. entity pays taxes to a foreign government on income earned abroad, the FTC allows that entity to offset its U.S. tax liability by claiming a credit for the foreign taxes paid. If the FTC exceeds the U.S. tax liability in a given year, the entity may carry the unused portion back one year or forward up to 10 years.

This can be a significant advantage for the Company, as it reduces the possibility of double taxation on international earnings.
FTC in the US for 80% of foreign taxes paid or accrued on the above-referenced net GILTI inclusion under Section 951A is available to the Company.
OBBB increases the GILTI allowance to 90% i.e. disallows 10% of the deemed paid FTC allowed for distributions of previously taxed net CFC tested income. Accordingly, no residual U.S. tax would be owed on income subject to a 14% foreign tax rate.

4. Bonus Depreciation – IRC Section 168(k)

The Material Subsidiary may be eligible for a 100% deduction of the cost of qualifying tangible

property, provided the property has a useful life of 20 years or less, as additional depreciation for property placed in service between 2018 and 2022.
The deduction rate will decrease to 80% in 2023, then to 60% in 2024, 40% in 2025, and 20% in 2026. After 2026, the deduction will expire unless extended by legislation in future.
OBBB permanently reinstates 100% bonus depreciation for most qualified property acquired after January 19, 2025.

5. Consolidated/Combined State Tax Returns:

Code Section / Ruling: Various state laws

Privilege to file a consolidated/combined state tax return in various jurisdictions with respect to the income tax imposed by various state laws is available to the Company.

B. Indirect Tax Laws

There are no possible special indirect tax benefits available to the Company.

Notes:

These Annexure sets out the possible special tax benefits available to the Company, in the United States of America.

No assurance is given that revenue authorities or courts will concur with the views expressed herein. Our views are based on the existing provisions of law and applicable interpretations thereof, which are subject to change from time to time. We do not assume responsibility to update the views subsequent to such changes.

This statement covers only certain possible special tax benefits, read with the relevant rules, regulations, and guidance in force in the United States. This statement also does not discuss any tax consequences in any country outside the United States, of an investment in the shares of a United States entity.

The above statement of possible special tax benefits is as per the current tax laws and several of these benefits are dependent on Company or its shareholders satisfying the conditions prescribed under the relevant provisions of the Code and/or other applicable law.

This Annexure is intended only to provide general information to investors and is neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of tax consequences, each investor is advised to consult his/her own tax advisor with respect to specific tax arising out of their participation in the Offer.

For OptraScan, Inc.

Abhijeet Gholap
CEO, Director

Place: San Jose
Date: July 25, 2026

ANNEXURE III

Statement of Special Tax Benefit available to Optra Scan India Private Limited ("Subsidiary") under tax laws of the India

Outlined below are the Possible Special Tax Benefits available to the Subsidiary and its shareholders under the Tax Laws. These Possible Special Tax Benefits are dependent on the Subsidiary and its shareholders fulfilling the conditions prescribed under the Tax Laws. Hence, the ability of the Subsidiary and its shareholders to derive the Possible Special Tax Benefits is dependent upon fulfilling such conditions, which are based on business imperatives it faces in the future, it may or may not choose to fulfill.

UNDER THE TAX LAWS

I. **Special tax benefits available to the Subsidiary**

i) **<u>Direct Taxes</u>**

a. **Lower corporate tax rate under section 200 of Income-tax Act, 2025 ('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 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

ii) **Indirect Taxes**

A. Under the Special Economic Zones Act (SEZ), 2005, read with corresponding indirect tax legislations, following indirect tax benefits are available to the Company on procurement subject to fulfilment of specified conditions and procedures prescribed under the relevant legislations:

a. Duty free domestic procurement as per Section 16 of Integrated Goods and Services Tax Act, 2017 (IGST Act) on goods or services brought from DTA to SEZ unit to carry on the authorized operations as approved by the Development Commissioner.

b. Exemption from payment of duties of Customs on import of goods under the Customs Act, 1962 or the Custom Tariff Act, 1975 in terms of **Notification No. 64/2017-Customs dated 5th July 2017**.

c. Exemption from payment of IGST under IGST Act, 2017, on services imported by a unit in the Special Economic Zone for authorized operations in terms of **Notification No. 18/2017 -Integrated Tax (Rate) dated 5th July 2017.**

B. Zero rated benefit under GST on export of services:

a. The Subsidiary is entitled to claim the benefit of zero-rated supplies with respect to services provided to customers located outside India, subject to fulfilment of conditions prescribed under the IGST Act, 2017.

b. The Subsidiary is entitled to claim refund of unutilized input tax credit (ITC) in terms of Section 54 of the CGST Act, 2017 read with Rule 89 of the CGST Rules, 2017 in respect of zero-rated supplies made under Letter of Undertaking without payment of tax subject to fulfilment of the specified conditions and procedures as prescribed under the relevant provisions.

2. Special tax benefits available to the Shareholders

i) **Direct Taxes**

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 146 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.

Indirect Taxes:

No special tax benefits are available to the shareholders of the Subsidiary under the Indirect Tax Laws.

NOTES:

1. The above is as per the current Tax Laws.
2. The above Statement of possible 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 Company.

3. This Statement does not discuss any tax consequences in any country outside India of an investment in the equity shares of the 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.

For OptraScan India Private Limited

Abhijeet Gholap
Director

Place: San Jose
Date: July 25, 2026

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ANNEXURE IV
LIST OF INDIA DIRECT AND INDIRECT TAX LAWS ('TAX LAWS')

Sr No.	Details of Tax Laws
1	Income-tax Act, 2025 and Income-tax Rules, 2026/Income-tax Act, 1961 and Income-tax Rules, 1962
2	Central Goods and Services Tax Act, 2017 (CGST Act)
3	Integrated Goods and Services Tax Act, 2017 (IGST Act)
4	State Goods and Services Tax Act, 2017 (SGST Act)
5	Special Economic Zones Act, 2005 and Special Economic Zones Rules, 2006, as amended
6	Customs Act, 1962 and Customs Tariff Act, 1975 read with respective rules, circulars and notifications made thereunder
7	Foreign Trade Policy 2023 read with Handbook of Procedures
8	Goods and Services Tax (Compensation to States) Act, 2017, as amended and read with respective circulars and notifications made thereunder

For OptraScan India Private Limited

Abhijeet Gholap
Director

Place: San Jose
Date: July 25, 2026