S.R. BATLIBOI & ASSOCIATES LLP
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STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO THE COMPANY AND ITS SHAREHOLDERS UNDER THE APPLICABLE LAWS IN INDIA

Date: July 26, 2026

To,

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

Dear Sir / Madam,

1. We, hereby confirm that the enclosed Annexure prepared by the Company states the special tax benefits available to the Company and its shareholders, under the Income Tax Act, 2025 ('the 2025 Act') and Income-tax Rules, 2026 ('2026 Rules') (read with applicable circulars and notifications), as amended by the Finance Act 2026, (referred 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 as 'Indirect Tax Laws' and together with the Direct Tax Laws, "Tax Laws"). These possible special tax benefits are dependent on the Company and / or the shareholders of the Company fulfilling the conditions prescribed under the relevant provisions of the above-mentioned Tax Laws. Hence, the ability of the Company and / or the shareholders of the Company to derive the tax benefits is dependent upon fulfilling such conditions, which based on the business imperatives the Company may face in future, and accordingly, the Company 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 Company'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 initial public offer of the equity shares of the Company ('IPO').

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

   i. the Company 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 Company and on the basis of their understanding of the business activities and operations of the Company.

S.R. Batliboi & Associates LLP Bengaluru

5. This statement is issued solely in connection with the proposed IPO and inclusion in the red herring prospectus and the prospectus of the Company, prepared under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations 2018, as amended to be submitted / filed with the Securities and Exchange Board of India, the BSE Limited, the National Stock Exchange of India Limited and the Registrar of Companies, as applicable, and is not to be used, referred to or distributed for any other purpose.

6. We have no responsibility to update this report for events and circumstances occurring after the date of this report.

For S.R. Batliboi & Associates LLP
Chartered Accountants
ICAI Firm Registration Number: 101049W/E300004

per Sandeep Karnani

S.R. Batliboi & Associates LLP Bengaluru

Partner
Membership Number: 061207
UDIN: 26061207CSENSR7304

Place: Bengaluru
Date: July 26, 2026

ANNEXURE TO THE STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO THE COMPANY AND ITS SHAREHOLDERS UNDER THE APPLICABLE DIRECT AND INDIRECT TAX LAWS ("TAX LAWS") IN INDIA

UNDER THE TAX LAWS

1. **Special tax benefits available to the Company and its shareholders under Income-tax Act, 2025 ('the 2025 Act') and Income-tax Rules, 2026, as amended by the Finance Act 2026, each as amended and read with respective circulars and notifications made thereunder (together referred to as, "Direct Tax Laws") – As applicable for Tax Year 2026-27:**

A. Special tax benefits available to the Company

(a) Lower corporate tax rates on income of domestic companies under section 200 of the 2025 Act (erstwhile section 115BAA of the Income-tax Act, 1961)

The 2025 Act continues the optional concessional tax regime for domestic companies through Section 200 of the 2025 Act, which corresponds to erstwhile section 115BAA of the Income-tax Act, 1961('1961 Act'). Section 200 of the 2025 Act provides an option to domestic companies to be taxed at a concessional rate of 22% (plus applicable surcharge and health and education cess), subject to fulfilment of prescribed conditions.

The option was originally introduced by the Taxation Laws (Amendment) Act, 2019 that introduced section 115BAA to the 1961 Act, wherein domestic companies are entitled to avail a concessional tax rate of 22% (plus applicable surcharge and cess) on fulfilment of certain conditions. The option to apply this tax rate is available from Tax Year 2019-20 relevant to assessment year 2020-21 and the option once exercised shall apply to subsequent assessment years. The concessional rate of 22% is subject to the Company not availing any of the following specified tax exemptions/incentives under the 2025 Act:

- Deduction u/s 144: Tax holiday available to units in a Special Economic Zone;
- Deductions available under the Chapter VIII other than provisions of section 146 and section 148;
- Deduction u/s 33(8): Additional Depreciation;
- Deduction u/s 46: Deduction for capital expenditure incurred on specified businesses;
- Deduction under section 45(2) or 45(3)(a) or (b) or (c): Expenditure on scientific research;
- Deduction under section 49: Site restoration expenses;

The total income of a company availing the concessional rate of 25.168% (i.e., 22% along with surcharge @10% and health and education cess @4%) is required to be computed without set-off of any carried forward loss or depreciation from any earlier tax year, if such loss or depreciation is attributable to any of the aforesaid deductions/incentives. A company can exercise the option to apply for the concessional tax rate in its return of income filed under section 263 of the 2025 Act. Further, provisions of Minimum Alternate Tax ('MAT') under section 206 of the 2025 Act shall not be applicable to companies availing this reduced tax rate, thus, any carried forward MAT credit also cannot be claimed.

The provisions do not specify any limitation/condition on account of turnover, nature of business or date of incorporation for opting for the concessional tax rate. Accordingly, all existing as well as new domestic companies are eligible to avail this concessional rate of tax.
Note: The Company has opted to apply the above concessional tax regime.

(b) Deductions in respect of employment of new employees – Section 146 of the 2025 Act (erstwhile section 80JJAA of the 1961 Act)

As per section 146 of the 2025 Act, where a company is subject to tax audit under section 63 of the 2025 Act and derives income from business, it shall be allowed deduction of an amount equal to 30% of additional employee cost incurred in the course of business in a previous year, for 3 consecutive assessment years including the assessment year relevant to the previous year in which such additional employee cost is incurred upon the fulfilment of the conditions prescribed in the 2025 Act.

Additional employee cost means the total emoluments paid or payable to additional employees employed in the previous year through an account payee cheque or account payee bank draft or by use of electronic clearing system through a bank account or through such other electronic mode as may be prescribed. These employees should also have total salary not more than Rs. 25,000/- per month and should also be member of a recognized provident fund.

The deduction under section 146 would continue to be available to the Company even where the Company opts for the lower tax rate of 22% under the provisions of section 200 of the 2025 Act (as discussed above).

(c) Deductions in respect of inter-corporate dividends – Section 148 of the 2025 Act (erstwhile section 80M of the 1961 Act)

As per the provisions of Section 148 of the 2025 Act, dividend received by the Company from any other domestic company or a foreign company or a business trust shall be eligible for deduction while computing its total income for the relevant year. A deduction is allowed of an amount equal to so much of the amount of income by way of dividends received from such other domestic company or foreign company or business trust as does not exceed the amount of dividend distributed by it on or before the due date as per the 2025 Act.

The 2025 Act retains the mechanism to avoid cascading taxation on inter-corporate dividends through Section 148 of the 2025 Act.

B. Special tax benefits available to the Shareholders

Dividend income will be subject to tax in the hands of domestic Shareholders at the applicable slab rate/ corporate tax rate (plus applicable surcharge and cess). In case of Non-resident Shareholders, tax will be applicable at 20% (plus applicable surcharge and cess) or as per applicable Double Taxation Avoidance Agreement (‘DTAA’).

Long term capital gains exceeding ₹ 1,25,000 on transfer of equity shares, or a unit of an equity-oriented fund or a unit of a business trust on which Securities Transactions Tax has been paid will be subject to tax in the hands of shareholders as per the provisions of Section 198 of the 2025 Act at 12.5% (plus applicable surcharge and cess). The benefit of indexation of costs shall not be available.

Short term capital gains arising on transfer of equity shares, or a unit of an equity-oriented fund or a unit of a business trust on which Securities Transactions Tax has been paid will be subject to tax in the hands of shareholders as per the provisions of section 196 of the 2025 Act at 20% (plus applicable surcharge and cess).

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Non-resident shareholders including foreign portfolio investors may choose to be governed by the provisions of Double Taxation Avoidance Agreement, to the extent they are more beneficial and subject to provision of the prescribed documents.

2. Benefits under Indirect Tax Laws

A. Special tax benefits available to the Company

Outlined below are the special tax benefits available to the Company and its shareholders under the Central Goods and Services Tax Act, 2017 / the Integrated Goods and Services Tax Act, 2017 / relevant State Goods and Services Tax Act, 2017 read with rules, circulars, and notifications ("GST Law"), the Customs Act, 1962, the Customs Tariff Act, 1975 ("Customs Law"), as amended from time to time, and Foreign Trade Policy 2023 ("FTP") (collectively referred to as "Indirect Tax Laws") as amended from time to time.

(a) Possible Special Indirect Tax Benefits available under the GST Laws

The Company has obtained registration under the GST law in ten States viz. Delhi, Uttar Pradesh, Bihar, Assam, Maharashtra, Karnataka, Goa, Kerela, Tamil Nadu and Andhra Pradesh. Additionally, the Company has obtained Input Service Distributor (ISD) registration in Goa. The Company undertakes export of goods from its unit registered in Goa. Under the GST regime, supplies of goods which are exported outside India are treated as zero-rated supplies. Such zero-rated supplies of goods are allowed to be made under either of the following options :

- Without payment of IGST under Bond/ Letter of Undertaking (LUT). Under this scenario, the exporter is allowed to claim refund of unutilized input tax credit.

- With payment of IGST. Under this scenario, the exporter is allowed to claim refund of IGST paid on exports.

(b) Special Indirect Tax Benefits available to the Company under Foreign Trade Policy 2023

- The Company avails duty-free import of capital goods as per Export Promotion Capital Goods Scheme under the Foreign Trade Policy, 2023, subject to export obligations equivalent to 6 times of duties, taxes and cess saved on such capital goods, to be fulfilled in 6 years from date of issue of authorisation.

- The Company claims the benefit of duty drawback on duty paid on import of materials used in manufacture of export goods as per Duty Drawback scheme under 75 of Custom Act, 1962.

- With respect to export of goods made from its unit in Goa, the Company is currently availing the benefit of remission of duties, taxes and other levies at the Central, State and local level which are borne on the exported goods manufactured in India under Remission of Duties and Taxes on Exported Products ('RoDTEP') scheme issued through Notification no. 19/2015-2020 dated 17 August 2021 by Ministry of Commerce & Industry under Department of Commerce .

- The Company is entitled to avail the benefit of duty-free import of input as per Advance Authorization Scheme under the Foreign Trade Policy, 2023, subject to export obligations. However, the Company has not applied for such scheme due to commercial viability.

B. Special tax benefits available to the Shareholders

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

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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 Company.

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 Company. 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 Molbio Diagnostics Limited (formerly Molbio Diagnostics Private Limited)

Sriram Natarajan
Director

Place: Goa
Date: July 26, 2026