

**STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO SAHAJANAND MEDICAL TECHNOLOGIES LIMITED (THE
"COMPANY"), THE SHAREHOLDERS OF THE COMPANY AND SMT CARDIOVASCULAR PRIVATE LIMITED
("MATERIAL SUBSIDIARY IN INDIA" or "SMT CV PL") UNDER THE DIRECT AND INDIRECT TAX LAWS IN INDIA**

To,
Board of Directors
Sahajanand Medical Technologies Limited
Sahajanand Estate
Wakharia Wadi, NR. Dabholi Char Rasta
Nani Ved, Ved Road, Surat
Gujarat – 395 004

Dear Sir / Madam,

We refer to the proposed initial public offering of equity shares (the "Offer") of **Sahajanand Medical Technologies Limited** (the "Company"). We enclose herewith the statement (the "Annexure") showing the current position of special tax benefits available to the Company, to its shareholders and to SMT Cardiovascular Private Limited ("SMT CV PL"), one of the material subsidiaries of the Company as per Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, as per the provisions of the Indian direct and indirect tax laws including the Income-tax Act, 2025 ('ITA, 2025') as amended by Finance Act, 2026 and to the extent applicable the Income-tax Act, 1961 ('ITA, 1961'); read with the Income-tax Rules, 2026 and to the extent applicable the Income-tax Rules, 1962; circulars, and notifications thereunder; applicable with effect from April 1, 2026 for tax year 2026-27, presently in force in India (collectively referred as "Direct Taxation Laws"), the Central Goods and Services Tax Act, 2017, the Integrated Goods and Services Tax Act, 2017 and the Union Territory Goods and Services Tax Act, 2017, respective State Goods and Services Tax Act, 2017 (collectively the "GST Legislation"), the Customs Act, 1962 ("Customs Act") and the Customs Tariff Act, 1975 ("Tariff Act"), including the rules, regulations, circulars and notifications issued in connection with such taxation laws (collectively the "Taxation Laws"), as presently in force and applicable to Tax Year 2026-27 for inclusion in the Red Herring Prospectus ("RHP") and the prospectus ("Prospectus" and together with the RHP, "Offer Documents") for the proposed Offer by the Company as required under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("ICDR Regulations").

Several of these benefits are dependent on the Company and / or its shareholders and / or the Material Subsidiary in India fulfilling the conditions prescribed under the relevant provisions of the Taxation Laws. Hence, the ability of the Company and/or its shareholders and the Material Subsidiary in India to derive these direct and indirect tax benefits is dependent upon their fulfilling such conditions which is based on business imperatives the Company and the Material Subsidiary in India may face in the near future and accordingly, the Company or its shareholders or the Material Subsidiary in India may or may not choose to fulfill.

The special tax benefits discussed in the enclosed Annexure are neither exhaustive nor conclusive. The contents stated in the Annexure are based on the information and explanations obtained from the Company including its material subsidiaries. The Annexure covers only possible special direct and indirect tax benefits available and does not cover any general tax benefits available to the Company and / or its shareholders or the Material Subsidiary in India. This

Deloitte Haskins & Sells LLP

statement is only intended to provide general information to guide the investors and 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 their own tax consultants, with respect to the specific tax implications arising out of their participation in the 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 benefits, which an investor can avail. We are neither suggesting nor are we advising the investors to invest or not to invest money based on this statement.

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

- The Company and/or its shareholders and / or the Material Subsidiary in India will continue to obtain these possible special tax benefits in future;
- The conditions prescribed for availing these possible special tax benefits have been/would be met with;
- The revenue authorities/courts will concur with the views expressed herein.

We hereby give our consent to include this report and the enclosed Annexure regarding the tax benefits available to the Company and its shareholders and the Material Subsidiary in India in the Offer Documents for the proposed Offer which the Company intends to file with the Securities and Exchange Board of India and the National Stock Exchange of India Limited and BSE Limited (the "Stock Exchanges") where the equity shares of the Company are proposed to be listed, as applicable, provided that the below statement of limitation is included in the Offer Documents.

LIMITATIONS

Our views expressed in the enclosed Annexure are based on the facts and assumptions indicated above. No assurance is given that the revenue authorities/courts will concur with the views expressed herein. Our views are based on the information, explanations and representations obtained from the Company and the Material Subsidiary in India and on the basis of our understanding of the business activities and operations of the Company and the existing provisions of tax laws in force in India and its interpretation, which are subject to change from time to time. We do not assume responsibility to update the views consequent to such changes. Reliance on the Annexure is on the express understanding that we do not assume responsibility towards the investors and third parties who may or may not invest in the proposed Offer relying on the statement and the Annexure. This statement has been prepared solely in connection with the proposed Offer by the Company under the ICDR Regulations.

For Deloitte Haskins & Sells LLP

Chartered Accountants

(Firm's Registration No. 117366W/V-100018)

Terence Lewis

Partner

Membership No. 107502

UDIN: 26107502XYVGAF5880

Place: Mumbai

Date: September 29, 2026

ANNEXURE TO THE STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO SAHAJANAND MEDICAL TECHNOLOGIES LIMITED (THE "COMPANY"), THE SHAREHOLDERS OF THE COMPANY AND SMT CARDIOVASCULAR PRIVATE LIMITED ("MATERIAL SUBSIDIARY IN INDIA" or "SMT CV PL") UNDER THE DIRECT AND INDIRECT TAX LAWS IN INDIA

The information provided below sets out the possible special tax benefits available to the Company, the shareholders of the Company and the Material Subsidiary in India, in a summary manner only and is not a complete analysis or listing of all potential direct tax consequences of the subscription, ownership and disposal of equity shares of the Company, under the current Taxation Laws presently in force in India.

Several of these benefits are dependent on the Company and/or its shareholders and / or the Material Subsidiary in India fulfilling the conditions prescribed under the Taxation Laws. Hence, the ability of the Company and/or its shareholders and / or the Material Subsidiary in India to derive the tax benefits is dependent upon fulfilling such conditions, which, based on business / commercial imperatives, the Companies and the Material Subsidiary in India may or may not choose to fulfil. We do not express any opinion or provide any assurance as to whether the Company and/or its shareholders and / or the Material Subsidiary in India will continue to obtain these benefits in present or future. The following overview is not exhaustive or comprehensive and is not intended to be a substitute for professional advice.

In view of the individual nature of the tax consequences and the changing tax laws, investors are advised to consult their own tax consultants with respect to the specific direct tax implications arising out of their participation in the Offer. We are neither suggesting nor are we advising investors to invest money or not to invest money based on this statement.

INVESTORS ARE ADVISED TO CONSULT THEIR OWN TAX CONSULTANT WITH RESPECT TO THE TAX IMPLICATIONS OF AN INVESTMENT AND CONSEQUENCES OF PURCHASING, OWNING AND DISPOSING OF EQUITY SHARES IN THE SECURITIES, 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 BENEFITS, WHICH AN INVESTOR CAN AVAIL IN THEIR PARTICULAR SITUATION.

POSSIBLE SPECIAL DIRECT TAX BENEFITS AVAILABLE TO THE COMPANY, ITS SHAREHOLDERS AND ITS MATERIAL SUBSIDIARY IN INDIA

The statement below covers only certain relevant direct tax benefits and does not cover any indirect tax benefits or benefits under any other law.

The statement outlined below is based on the provisions of the Direct Taxation Laws presently in force in India as applicable for Tax Year ("TY") ending March 31, 2027.

I. SPECIAL DIRECT TAX BENEFITS AVAILABLE TO THE COMPANY AND ITS MATERIAL SUBSIDIARY IN INDIA

The statement of tax benefits outlined below is as per the Income-tax Act, 2025 ('ITA, 2025') as amended by Finance Act, 2026 and to the extent applicable the Income-tax Act, 1961 ('ITA, 1961'); read with the Income-tax Rules, 2026 and to the extent applicable the Income-tax Rules, 1962; circulars, and notifications thereunder; applicable with effect from April 1, 2026 for tax year 2026-27, presently in force in India (collectively referred as "Direct Taxation Laws")

1) Lower corporate tax rate under Section 200 of the Income-tax Act, 2025 ("the Act"):

As per Section 200 of the Act, a domestic company has an option to pay income tax in respect of its total income at a concessional tax rate of 22% (plus surcharge of 10% and cess of 4%), subject to satisfaction of certain conditions.

Further, provisions of Minimum Alternate Tax ('MAT') under Section 206 of ITA, 2025 shall not be applicable to companies availing this reduced tax rate, thus, any carried forward MAT credit also cannot be claimed.

In such a case, the company will not be allowed to claim any of the following deductions/exemptions under the Act:

- a. Deduction under the provisions of Section 144 (deduction for units in Special Economic Zone);
- b. Deduction under sub-section (8) of Section 33 (Additional depreciation);
- c. Deduction under Section 48 or Section 49 (Investment deposit account, site restoration fund);
- d. Deduction under sub-section (2) or sub-clause (a) or sub-clause (b) or sub-clause (c) of sub-section (3) of Section 45 (Expenditure on scientific research);
- e. Deduction under Section 46 or sub-clause (a) of sub-section (1) of Section 47 (Deduction for specified business, agricultural extension project);
- f. Deduction under sub-clause (b) of sub-section (1) of Section 47 (Expenditure on skill development);
- g. Deduction under any provisions of Chapter VIII other than the provisions of Section 146 (Deduction in respect of employment of new employees) and 148 (Deduction in respect of certain inter-corporate dividends);
- h. No set-off of any loss carried forward or depreciation from any earlier assessment year, if such loss or depreciation is attributable to any of the deductions referred above;
- i. No set-off of any loss or allowance for unabsorbed depreciation deemed so under Section 116, if such loss or depreciation is attributable to any of the deductions referred above.

The option needs to be exercised on or before the due date of furnishing the return of income under section 263(1) of the Act in the prescribed manner for the relevant year. Once the option is exercised, it cannot be subsequently withdrawn for the same year or any other tax year and therefore, such option once exercised shall apply to subsequent assessment years.

The Company has opted to apply section 115BAA of the Income Tax Act, 1961 from the Financial Year 2021-22 (Assessment Year 2022-23) onwards. Accordingly, the Company is governed by corresponding section 200 of ITA, 2025.

2) Lower corporate tax rate under section 201 of the Act:

As per section 201 of the Act, with effect from TY 2019-20, concessional tax benefits were provided for new domestic manufacturing companies incorporated on or after 01 October 2019 and which has commenced manufacturing or production of an article or thing on or before 31 March 2024, to pay income tax in respect of its total income at a concessional tax rate of 15% (plus surcharge of 10% and cess of 4%). The concessional tax rate is available provided the company does not avail specified exemptions / incentives / deductions or set-off of losses/ unabsorbed depreciation etc., claims depreciation in the prescribed manner and complies with other conditions specified in section 201 of the Act.

The Material Subsidiary in India is eligible for lower corporate tax under Section 201 of the Act and accordingly will not be allowed to claim specified exemptions / incentives / deductions or set-off of losses/ unabsorbed depreciation as follows:

- a. Deduction under the provisions of Section 144 (deduction for units in Special Economic Zone);
- b. Deduction under sub-section (8) of Section 33 (Additional depreciation);
- c. Deduction under Section 48 or Section 49 (Investment deposit account, site restoration fund);
- d. Deduction under sub-section (2) or sub-clause (a) or sub-clause (b) or sub-clause (c) of sub-section (3) of Section 45 (Expenditure on scientific research);
- e. Deduction under Section 46 or sub-clause (a) of sub-section (1) of Section 47 (Deduction for specified business, agricultural extension project);
- f. Deduction under sub-clause (b) of sub-section (1) of Section 47 (Expenditure on skill development);
- g. Deduction under any provisions of Chapter VIII other than the provisions of Section 146 (Deduction in respect of employment of new employees) and 148 (Deduction in respect of certain inter-corporate dividends);
- h. No set-off of any loss carried forward or depreciation from any earlier assessment year, if such loss or depreciation is attributable to any of the deductions referred above;
- i. No set-off of any loss or allowance for unabsorbed depreciation deemed so under Section 116, if such loss or depreciation is attributable to any of the deductions referred above.

In case the Material Subsidiary in India has earned any income, which has neither been derived from nor is incidental to manufacturing or production of an article or thing and in respect of which no specific rate of tax has been provided separately, such income shall be taxed at the rate of 22% (plus surcharge of 10% and cess of 4%) and no deduction or allowance in respect of any expenditure or allowance shall be allowed in computing such income. Further, any short-term capital gains derived from transfer of a capital asset on which no depreciation is allowable under the Act shall be computed at the rate of 22% (plus surcharge of 10% and cess of 4%).

Further, provisions of Minimum Alternate Tax ('MAT') under Section 206 of ITA, 2025 shall not be applicable to companies availing this reduced tax rate, thus, any carried forward MAT credit also cannot be claimed.

The option needs to be exercised on or before the due date of furnishing the first return of income under section 263(1) of the Act in the prescribed manner for the relevant year. Once the option is exercised, it cannot be subsequently withdrawn for the same year or any other tax year and therefore, such option once exercised shall apply to subsequent assessment years.

The Company has opted to apply section 115BAB of the Income Tax Act, 1961 from the Financial Year 2019-20 (Assessment Year 2020-21) onwards. Accordingly, the Company is governed by corresponding section 201 of ITA, 2025.

3) Deduction under Section 148 of the Act in respect of certain inter-corporate dividends:

As per the provisions of Section 148 of the Act, dividend received by a company from any other domestic company or a foreign company shall be eligible for deduction while computing its total income for the relevant year.

The amount of such deduction would be restricted to the amount of dividend distributed by the company to its shareholders on or before one month prior to the due date of furnishing the return of income under section 263(1) of the Act for the relevant tax year.

Since the Company has investments in and outside India, it can avail the above-mentioned benefit under Section 148 of the Act, subject to fulfilment of conditions specified therein.

4) Deduction under Section 146 of the Act, in respect of employment of new employees:

As per Section 146 of the Act, an assessee subject to tax audit under section 63 of the Act is entitled to claim deduction from the gross total income of an amount equal to thirty per cent of additional employee cost (relating to specified

category of employees) incurred in the course of business in the previous year, for three assessment years including the assessment year relevant to the previous year in which such employment is provided, subject to fulfilment of prescribed conditions.

The Company and SMT CV PL can avail the above-mentioned benefit under Section 146 of the Act, subject to fulfilment of conditions specified therein.

5) Deductions under section 52 of the Act, in respect of merger/demerger expenditure:

In accordance with and subject to the fulfilment of conditions as laid out under section 52 of the Act, a domestic company may be entitled to amortize expenditure incurred wholly and exclusively for the purposes of amalgamation or demerger of an undertaking. The deduction is allowable for an amount equal to one-fifth of such expenditure for each of five successive previous years beginning with the previous year in which the amalgamation or demerger takes place.

6) Deductions in respect of scientific research related:

In accordance with and subject to the fulfilment of conditions as laid out under section 45(1)(a)(i) of the Act, the company may be entitled to deduction of 100% of the capital expenditure incurred on scientific research related to the business carried on by the Company for the year in which the said expenditure is incurred.

The Company can avail the above-mentioned benefit under Section 45(1)(a)(i) of the Act, subject to fulfilment of conditions specified therein.

II. SPECIAL DIRECT TAX BENEFITS AVAILABLE TO THE SHAREHOLDERS

- 1) 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 148 of the Act would be available on fulfilling the conditions (as detailed above). However, the maximum surcharge applicable to shareholders who are individuals, Hindu Undivided Family, Association of Persons, Body of Individuals, whether incorporated or not and every artificial juridical person would be 15%, irrespective of the amount of dividend.

Further, the shareholders would be entitled to take credit of the tax deducted at source by the Company against the taxes payable by them on dividend income.

- 2) As per section 198 of the Act, long-term capital gains arising from transfer of an equity share shall be taxed at 12.5% plus applicable surcharge and cess (without benefit of indexation) subject to payment of securities transaction tax on acquisition and transfer of equity share and fulfilment of other prescribed conditions under the Act as well as Notification No. 60/2018/F.No.370142/9/2017-TPL dated 1 October 2018. However, no tax under said section shall be levied where such capital gains do not exceed Rs. 1,25,000 in a financial year.
- 3) As per section 196 of the Act, short-term capital gains arising from transfer of an equity share shall be taxed at 20% plus applicable surcharge and cess subject to payment of securities transaction tax and fulfilment of other prescribed conditions under the Act.
- 4) Individual shareholders may avail the benefit of the simplified/new tax regime, where eligible. Accordingly, the taxability of income in the hands of the shareholders would depend upon the tax regime elected by the respective shareholder and the applicability of the relevant provisions. Individual shareholders are advised to consult their own professional advisors regarding the possible tax consequences that would be applicable to them.

- 5) Resident as well as non-resident buyers should independently evaluate their tax obligations on transactions involving sale of shares by the shareholders of the company considering the provisions of section 393 of ITA, 2025

Except for the above, the Shareholders of the Company are not entitled to any other special tax benefits under the Act.

Notes:

1. This statement does not discuss any tax consequences arising in a country outside India pursuant to an investment in the shares of the Company. The shareholders in the country outside India are advised to consult their own professional advisors regarding the possible tax consequences that apply to them in such country outside India.
2. In respect of non-resident shareholders, the taxation and tax rates discussed above may be further subject to any benefit available under the applicable Double Taxation Avoidance Agreement, if any, between India and the country in which the non-resident has fiscal domicile. Applicability of DTAA benefit shall be subject to furnishing of relevant documents/declarations viz. tax residency certificate, Form 41, etc. and fulfillment of the conditions in the treaty by the non-resident shareholders.



POSSIBLE SPECIAL INDIRECT TAX BENEFITS AVAILABLE TO THE COMPANY, ITS SHAREHOLDERS AND THE MATERIAL SUBSIDIARY IN INDIA

The Statement of possible tax benefits enumerated below is per the Central Goods and Services Tax Act, 2017 ("CGST Act"), the Integrated Goods and Services Tax Act, 2017 ("IGST Act"), the Union Territory Goods and Services Tax Act, 2017 ("UTGST Act"), respective State Goods and Services Tax Act, 2017 ("SGST Act") (All these legislations collectively referred to as "GST Legislation"), the Customs Act, 1962, the Customs Tariff Act, 1975 ("Customs Tariff Act") and Foreign Trade Policy (collectively referred to as "Indirect Tax") as amended from time to time and as applicable for financial year 2025-26.

A. SPECIAL INDIRECT TAX BENEFITS AVAILABLE TO THE COMPANY AND THE MATERIAL SUBSIDIARY IN INDIA

I. Remission of Duties and Taxes on Exported Products (RoDTEP)

The Remission of Duties and Taxes on Exported Products (RoDTEP) scheme was announced by Government of India (GOI) on 14 September 2019 to boost exports. The objective of scheme is to refund, currently un-refunded duties/ taxes/ levies at the central, state and local level, borne on the exported product including prior stage cumulative indirect taxes on goods and services used in production of the exported product; and such indirect duties/taxes/levies in respect of distribution of exported products. Under the scheme, rebate of aforesaid taxes will be given in the form of electronic scrip which could be utilised for payment of basic customs duty. The said scheme will take effect for exports from 01 January 2021.

The benefit under RoDTEP Scheme was made available to units located in SEZs vide Notification No. 70/2023 dated 8 March 2024 and Notification No 11/2025 dated 26 May 2025. Consequently, SEZ units were required to migrate to the ICEGATE portal in order to claim benefits under the RoDTEP Scheme, which became operational for SEZ units with effect from 1 July 2024, as per the clarification issued by the Department of Commerce on 29 June 2024. The RoDTEP benefit for SEZ units was available up to 5 February 2025 and restored with effect from 1 June 2025 onwards. Further, pursuant to Notification No. 74/2025-26 dated 31 March 2026, the RoDTEP Scheme presently stands extended up to 30 September 2026. Accordingly, any entitlement to RoDTEP benefits in respect of exports made on or after 1 October 2026 would be subject to any further extension or notification issued by the Government.

Based on the above, the Company's SEZ unit is eligible to avail RoDTEP benefits in respect of eligible exports made during the applicable periods, subject to compliance with the prescribed conditions, declarations, procedural requirements and documentation requirements under the applicable RoDTEP, Customs and Foreign Trade Policy provisions.

II. Import of capital goods without payment of customs duty under Export Promotion Capital Goods Scheme ("EPCG Scheme")

The objective of the EPCG Scheme is to facilitate import of capital goods for producing quality goods and services and enhance India's manufacturing competitiveness. EPCG Scheme allows import of capital goods (except those specified in negative list in Appendix 5 F) for pre-production, production and post-production at zero customs duty (i.e. exemption from basic customs duty, additional customs duty along with Integrated Goods and Services Tax ("IGST") and compensation cess). EPCG Scheme covers manufacturer exporters with or without supporting manufacturer(s), merchant exporters tied to supporting manufacturer(s) and service providers. As per provisions contained under Chapter 5 of Foreign Trade Policy 2023 ("FTP") and Handbook of Procedures 2023 read with Notification No. 26/2023 – Customs dated 01 April 2023, the imports under EPCG Scheme are subject to an Export Obligation ("EO") on Free on Board (FOB) basis equivalent to six times of duties, taxes and cess saved on capital goods which is required to be

fulfilled within six years reckoned from date of issue of authorization. Further, the authorization is valid for undertaking import of goods for 24 months from the date of issue of authorization.

SMT CV PL, has obtained EPCG authorization from Directorate General of Foreign trade ("DGFT") towards availing the benefit of duty-free import of capital goods falling under HSN code 84775900, 85152190, 84772000.

III. Exemption of Customs duty on import of goods as part of ASEAN – INDIA Free Trade Area Preferential Tariff between Government of the Kingdom of Thailand and The Republic of India

The Customs Act, 1962 provides power to the Central Government to grant concessional duty or exempt duty of customs leviable on imported goods to the extent it finds feasible if the said goods are imported into India from the Government of the Kingdom of Thailand as part of ASEAN-INDIA Free Trade Area Preferential Tariff as per the relevant exemption notification, with Notification No. 101/2004 - Cus. (N.T.) dated 31 August 2004 prescribing the origin rules and as amended from time to time. In order to avail the said tariff concession, the importer is required to prove to the satisfaction of the Customs authorities that the goods in respect of which the benefit of concession/exemption is being claimed are of the origin from the Government of the Kingdom of Thailand.

The Company has availed benefit of nil basic customs duty against import of goods made from Thailand.

IV. Concession in custom duty over & above 5% of the tariff rate for all Research and Development related ("R&D") imports under customs.

The Customs Act, 1962, provides power to the Central Government to exempt duty of customs as in excess of the amount calculated at the rate of five percent ad valorem, in the Notification no. 51/1996 – Customs dated 23 July 1996 as amended from time to time. The said notification provides the concessional duty benefits when the goods are imported for research purposes subject to fulfilment of the prescribed conditions including the applicable requirements relating to the registration of the importer with the Department of Scientific and Industrial Research ("DSIR").

The Company has availed benefit of discharging concessional rate of basic custom duty at 5% on assessable value. The benefit under this Notification was extended from 31 March 2024 to 31 March 2029 vide Notification no. 38/2024- Customs dated 23 July 2024.

V. Benefits under Special Economic Zones Act, 2005

As per section 7 of Special Economic Zones Act, any goods or services exported out of, or imported into, or procured from the Domestic Tariff Area by a unit in a Special Economic Zone or a developer shall be exempted from the payment of taxes, duties or cess, subject to compliance with such terms, conditions and limitations, as may be prescribed under the SEZ Act.

The Company has its manufacturing unit located in Surat SEZ.

VI. Export of goods under the Goods and Services Tax ('GST') law

GST law inter-alia allows export of goods at zero rate on fulfilment of certain conditions. Exporters can export goods under Bond / Letter of Undertaking (LUT) without payment of IGST and claim refund of accumulated Input tax credit ('ITC') on account of export of goods. There is also an alternative available to export goods with payment of IGST and subsequently claim refund thereof as per the provisions of Section 54 of Central Goods and Services Tax Act, 2017.

The Company and SMT CV PL are claiming refunds under this provision.

VII. Advance Authorisation:

The objective of the Advance Authorisation scheme is to facilitate import of material to be used in manufacturing goods to be exported thereby enhancing India's manufacturing and export competitiveness. Advance Authorisation is issued to allow duty free import of inputs, which is physically incorporated in the export product. Advance Authorisation can be issued either to (a) a manufacturer exporter or (b) merchant exporter tied to supporting manufacturer. An advance authorisation holder is required to achieve a prescribed minimum value addition and fulfil the export obligation mentioned in the authorisation within a prescribed time period to enjoy the aforesaid duty-free benefit while importing the raw material. Advance Authorisation and / or material imported under Advance Authorisation shall be subject to 'Actual User' condition. Imports under Advance Authorisation are exempted from payment of basic customs duty, additional customs duty, anti-dumping duty, countervailing duty, safeguard duty, transition product specific safeguard duty, wherever applicable. Further, imports under Advance Authorisation for physical as well as deemed exports are also exempt from whole of the integrated tax and compensation cess leviable under Section 3(7) and Section 3(9) of the Customs Tariff Act, 1975.

SMT CV PL is availing benefit under this scheme for its unit set up in Telangana.

VIII.State Specific Incentives in Telangana Medical Device Park

With an objective to boost domestic manufacturing and attract large investments in the Medical Technology Park, the Telangana State Department has given certain incentives. This scheme provides the following incentives:

Type of Subsidy (refer note*)	Subsidy rate	Max Value (Amount in INR crore)	Max period
Capital Subsidy	20% of project value	15	NA
Interest Subsidy	8%	25	5 years
Power tariff Subsidy	Rs. 2.5 per unit	NA	10 years
Reimbursement of Training Subsidy	NA	1	NA
Net SGST Subsidy	100%	15	10 years

*Note - Mandatory creation of 1,000 direct employment by the unit for availing all the subsidies.

As of date, SMT CV PL has not achieved the committed employment number, Accordingly, no incentive has been earned or disbursed under the scheme.

IX. Concessional customs duty benefit on DTA clearances by SEZ Unit

In addition to the benefits available to the Company in respect of its SEZ operations, the Central Government has introduced a special one-time relief measure under Notification No. 11/2026-Customs dated 31 March 2026 for eligible manufacturing units in SEZs clearing specified manufactured goods into the Domestic Tariff Area ("DTA"). The notification provides concessional rates of customs duty on such DTA clearances, subject to the prescribed conditions, and is effective from 1 April 2026 to 31 March 2027.

Accordingly, the Company satisfies the eligibility conditions under the said notification, the concessional customs duty benefit on eligible DTA clearances is available over and above the general SEZ benefits applicable to imports into the SEZ and procurements made for authorised operations.

B. SPECIAL INDIRECT TAX BENEFITS AVAILABLE TO THE SHAREHOLDERS

Shareholders of the Company are not eligible to special indirect tax benefits under the provisions of the Central Goods and Services Tax Act 2017 (read with Central Goods and Services Tax rules, circulars, notifications), respective State Goods and Services Tax Act, 2017 (read with respective State Goods and Services Tax rules, circulars, notifications) Union Territory Goods and Services Tax Act, 2017 (read with Union Territory Goods and Services Tax rules, circulars, notifications), Integrated Goods and Services Tax Act, 2017 (read with Integrated Goods and Services Tax rules, circulars, notifications), The Foreign Trade (Development and Regulation) Act, 1992 (read with Foreign Trade Policy 2023), Customs Act, 1962 (read with Custom Rules, circulars, notifications), Customs Tariff Act, 1975 (read with Custom Tariff Rules, circulars, notifications), Special Economic Zones Act, 2005, and Production Linked Incentive (PLI) Scheme to promote domestic manufacturing of Medical Devices under Department of Pharmaceuticals and State Specific Incentives in Telangana Medical Device Park.

Notes:

1. This Annexure is intended only to provide general information to the 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 tax advisor with respect to specific taxes arising out of the shares allotted.
2. This statement does not discuss any tax consequences in a country outside India of an investment in the shares. The shareholders / investors in the country outside India are advised to consult their own professional advisors regarding possible income tax consequences that apply to them.

