

NIKUNJ RAICHURA & ASSOCIATES
CHARTERED ACCOUNTANTS

**STATEMENT OF POSSIBLE SPECIAL TAX BENEFITS AVAILABLE TO SMT GERMANY GmbH
AND ITS SHAREHOLDERS**

Date: September 29, 2026

To,

**The Board of Directors,
Sahajanand Medical Technologies Limited
Sahajanand Estate, Wakharia Wadi
NR. Dabholi Char Rasta, Nani Ved
Ved Road, Surat
Gujarat - 395 004, India**

**SMT Germany GmbH
Weiseler Strasse 16,
35510, Butzbach, Germany**

Dear Sirs,

Proposed initial public offering ("IPO") of the equity shares of Sahajanand Medical Technologies Limited (the "Ultimate Holding Company"), the ultimate holding Company of SMT Germany GmbH ("Material Subsidiary in Germany") and the statement of possible special tax benefits available to the Material Subsidiary in Germany and its shareholders in the Germany.

We, Nikunj Raichura & Associates, Chartered Accountant ("the Firm") hereby confirm that the enclosed 'Annexure 1' provides the possible special tax benefits available to the Material Subsidiary in Germany and to its shareholders under the applicable direct tax laws i.e. Corporation Tax Act, Income Tax Act, Trade Tax Act, Wage Tax, Foreign Tax Act and indirect tax laws i.e. Value Added Tax Act (together, the "Tax Laws"), presently in force in Germany.

The benefits discussed in the enclosed 'Annexure 1' are not exhaustive and do not cover any general tax benefits available to the Material Subsidiary in Germany. The Statement is only intended 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 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 IPO of Ultimate Holding Company, 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 possible special tax benefits, which an investor can avail. We do not express any opinion or provide any assurance as to whether:

- a) the Material Subsidiary in Germany will continue to obtain these possible special tax benefits in future; or**
- b) the conditions prescribed for availing the possible special tax benefits where applicable, have been/would be met with, or**
- c) the revenue authorities will concur with the views expressed herein.**

**Office No 203, 2nd Floor, Hub Town Solaris, Teli Gali Cross Road, Behind Big Boy Toys,
Andheri East, Mumbai, Maharashtra - 400069**



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This statement can be included in the red herring prospectus and the prospectus proposed to be filed by the Ultimate Holding Company with the Registrar of Companies, Gujarat at Ahmedabad, the Securities and Exchange Board of India, the National Stock Exchange of India Limited and BSE Limited, or in any other offer-related documents prepared in relation to the IPO and is not to be used, referred to or distributed for any other purpose.

Yours Faithfully,

For Nikunj Raichura & Associates
Chartered Accountants
ICAI Firm Registration Number: 158531W

N.A. Raichura

Nikunj Raichura
Membership Number: 180493
UDIN: 26180493VFOCLJ1155



Date: September 29, 2026
Place: Mumbai

NIKUNJ RAICHURA & ASSOCIATES
CHARTERED ACCOUNTANTS

‘Annexure 1’

**STATEMENT OF POSSIBLE SPECIAL TAX BENEFITS AVAILABLE TO SMT GERMANY GmbH
AND ITS SHAREHOLDERS UNDER THE APPLICABLE TAX LAWS IN GERMANY.**

There are no special tax benefits available to the Material Subsidiary in Germany or its shareholders under the applicable tax laws in the Germany.

NOTES:

1. The above statement of direct and indirect tax benefits sets out any possible special tax benefits available to the Material Subsidiary in Germany and its shareholders under the current tax laws presently in force in Germany. Special tax benefits for these purposes are considered to be those that have been agreed by the Material Subsidiary in Germany with the German tax authorities outside of existing practice or understanding of the current tax laws presently in force in Germany.
2. This statement is only intended 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 the tax consequences, the changing tax laws, each investor is advised to consult their own tax consultant with respect to the specific tax implications arising out of their participation in the issue.
3. This statement does not discuss any tax consequences in any country outside of Germany.
4. The above statement covers only the applicable Germany tax laws and does not cover any other law.
5. Our views expressed in this statement are based on the facts and assumptions as we understand them. 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 change from time to time. We do not assume responsibility to update the views consequent to such changes.

