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STATEMENT OF SPECIAL TAX BENEFITS

STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO SAHAJANAND MEDICAL TECHNOLOGIES IRELAND LIMITED (HEREAFTER ALSO REFERRED TO AS 'THE MATERIAL SUBSIDIARY IN IRELAND' OR 'SMT IRELAND') UNDER THE DIRECT AND INDIRECT TAX LAWS WHICH APPLY IN THE REPUBLIC OF IRELAND

29 September 2026

To:

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

SMT Ireland Limited,
Ground Floor, Block 5,
Galway Technology Park,
Parkmore, Galway,
Co. Galway
IRELAND

Dear Sirs,

RE: Statement of potential Special Tax Benefits available to the Material Subsidiary in Ireland under the direct and indirect tax laws, which apply in the Republic of Ireland

Further to the terms of our Engagement Letter dated 16 April 2025 and signed 17 April 2025 and your requested revision as per the email correspondence dated 16 September 2026, RBK tax enclose the Statement (the “**Annexure**”) summarising potential special tax benefits available to the Material Subsidiary in Ireland (i.e. SMT Ireland). The Statement is in respect of the current taxation assessment year being the year end 31 March 2026, notwithstanding that the benefits and conditions outlined below are applicable for the calendar year 01 January 2026 – 31 December 2026, based on direct and indirect taxation laws of the Republic of Ireland as of the date of this Statement.

Special tax benefits for these purposes are considered to be those that have been agreed by the Material Subsidiary in Ireland with the Irish tax authorities outside of existing practice or understanding of the current tax laws presently in force in Ireland.

The potential benefits discussed in the enclosed Annexure are neither exhaustive nor conclusive. The contents of the Annexure are based on the information and explanations

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Directors: J Cleary FCA (Managing Partner), J Boland, B Feeney FCA, J Fitzmaurice, L Hill, R Kilbane FCA, R McGivern FCA, J Masterson FCA, C Melia FCA, B Mullally FCA, F Murphy FCA, C O'Brien FCA, B O'Donoghue, M O'Donoghue FCA, C O'Grady FCA, M O'Grady.

Associate Ptrs: C McCrossan, S McMahon FCA, M Moriarty FCA

Consultants: D Gleeson FCA, G O'Malley FCA, P O'Malley FCA, M Cosgrove FCA, M Higgins FCA

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RBK is a trading name of RBK Business Advisers Limited, incorporated in Ireland under company number 141428, which is part of the RBK Group, with registered office at RBK House, Irishtown, Athlone, Co. Westmeath, N37 XP52, Ireland and is registered to carry on audit work and authorised to carry on investment business by Chartered Accountants Ireland.





obtained from the Company. This Statement is only intended to provide general information and is neither designed nor intended to be a substitute for professional tax advice. In view of the individual nature of taxation matters and the changing tax landscapes that apply both in the Republic of Ireland and in each investor's state of tax residence, each investor should consult their own tax consultants with respect to the specific tax implications arising out of their participation in the proposed initial public offer. RBK tax note in particular that investors are not subscribing for shares in the Company itself but rather in its parent entity, namely Sahajanand Medical Technologies Limited ('the Company'). We are neither suggesting nor are we advising potential investors to invest or not to invest money based on this Statement.

The contents of the enclosed Annexure are based on the representations obtained from the Company and based on our understanding of the business activities and operations of the Company arising therefrom.

RBK tax do not express any opinion or provide any assurance whether:

- The Material Subsidiary in Ireland will continue to obtain these benefits in future;
- The conditions prescribed for availing of the benefits have been/would be met;
- The Irish Revenue authorities and/or Irish courts will concur with the views expressed herein.

This Statement is provided solely for the purpose of assisting the Company in discharging its responsibilities under the ICDR Regulations.

RBK tax hereby give consent to include this Statement and the Annexure in the Red Herring Prospectus (the "**RHP**") and the prospectus (the "**Prospectus**") for the proposed initial public offer of SMT Ireland's parent entity, namely Sahajanand Medical Technologies Limited. The RHP and Prospectus are to be submitted to the Registrar of Companies, Gujarat at Ahmedabad, the Securities and Exchange Board of India, the National Stock Exchange of India Limited and BSE Limited (the "**Stock Exchanges**") where the equity shares of Sahajanand Medical Technologies Limited are proposed to be listed, as applicable, provided that the below Statement of limitation is included in the RHP and Prospectus.

Signed on behalf of RBK Business Advisers

RBK Business Advisers

RBK Business Advisers

29 September 2026

Date



**ANNEXURE TO THE STATEMENT OF TAX BENEFITS POTENTIALLY AVAILABLE
TO SAHAJANAND MEDICAL TECHNOLOGIES IRELAND LIMITED (HEREAFTER
REFERRED TO AS 'THE MATERIAL SUBSIDIARY IN IRELAND')**

There are no special tax benefits available to the Material Subsidiary in Ireland or its shareholders under the applicable direct and indirect tax laws in Ireland.

NOTES:

1. The above statement of direct and indirect tax benefits sets out any possible special tax benefits available to the Material Subsidiary in Ireland and its shareholders under the current tax laws presently in force in Ireland. Special tax benefits for these purposes are considered to be those that have been agreed by the Material Subsidiary in Ireland with the Irish tax authorities outside of existing practice or understanding of the current tax laws presently in force in Ireland.
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 Ireland.
4. The above statement covers only the applicable Irish 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 Irish revenue authorities/Irish courts will concur with the views expressed herein. Our views are based on the existing provisions of Irish law and its interpretation, which are subject to change from time to time, notably in October each year when the national budget occurs. The annual budget can give rise to changes in the existing tax legislation, some of which take immediate effect, others which take effect from 01 January of the following year, or which will affect accounting periods beginning on or after a specified date (usually 01 January of the year following the budget). We do not assume responsibility to update the views consequent to such changes.