STATEMENT OF POSSIBLE TAX BENEFITS

To
The Board of Directors
SHREYAS FABTECH LIMITED
Plot No.H37, MIDC Ambad,
Nashik, Maharashtra, India, 422010

Dear Sir,

Sub: Statement of Possible Special Tax Benefits ("the Statement") available to Shreyas Fabtech Limited ("the Company") and its shareholders prepared in accordance with the requirements in Point No. 9 (L) of Part A of Schedule VI of the Securities Exchange Board of India (Issue of Capital Disclosure Requirements) Regulations 2018, as amended ("the Regulations")

We hereby report that this certificate along with the annexure (hereinafter referred to as "The Statement") states the possible special tax benefits available to the Company and the shareholders of the Company under the Income Tax Act, 1961 and Income Tax Act, 2025 ('IT Act') (read with Income Tax Rules, Circulars and Notifications) as amended by the Finance Act, 2026 (i.e. applicable to F.Y. 2026-27 relevant to A.Y. 2027-28) (hereinafter referred to as the "IT Regulations") and under the Goods And Service Tax Act, 2017 (read with Goods And Service Tax[GST] Rules, Circulars and Notifications), presently in force in India. The Statement has been prepared by the management of the Company in connection with the proposed Public offer, which we have initiated for identification purposes only.

Several of these benefits are dependent on the Company or its shareholders fulfilling the conditions prescribed under the said relevant provisions of the tax laws and regulations applicable to the Company. Hence, the ability of the Company or its shareholders to derive the special tax benefits, if any, is dependent upon fulfilling such conditions, which based on business imperatives, which the Company may or may not choose to fulfill or face in the future.

The benefits discussed in the enclosed annexure cover only special tax benefits available to the Company and its shareholders and do not cover any general tax benefits available to the Company or its shareholders. Further, the Preparation of enclosed statement and the contents stated therein is not exhaustive and is the responsibility of the Company's management. 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. A shareholder is advised to consult his/ her/ its own tax consultant with respect to the tax implications arising out of his/her/its participation in the proposed issue, particularly in view of ever-changing tax laws in India. Further, we give no assurance that the income tax authorities/ other indirect tax authorities/courts will concur with our views expressed herein.

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

- the Company or its shareholders will continue to obtain these benefits in future; or
- the conditions prescribed for availing the benefits have been/would be met.

The contents of this annexure are based on information, explanations and representations obtained from the Company and on the basis of our understanding of the business activities and operations of the Company and the provisions of the tax laws.

The information provided below sets out the Possible Special Direct Tax & Indirect Tax benefits available to the Company, and its Shareholders in a summary manner only and is not a complete analysis or listing of all potential tax consequences of the subscription, ownership and disposal of Equity Shares, under the current tax laws presently in force in India. Several of these benefits are dependent on the Company and its Shareholders fulfilling the conditions prescribed under the relevant tax laws. Hence, the ability of the Company, and the Shareholders of the Company to derive the direct and indirect tax benefits is dependent upon their fulfilling such conditions, which is based on business imperatives the Company may face in the future and accordingly, the Company, and the Shareholders of the Company may or may not choose to fulfil. Further, certain tax benefits may be optional, and it would be at the discretion of the

Company or the Shareholders of the Company to exercise the option by fulfilling the conditions prescribed under the Tax Laws.

The following overview is not exhaustive or comprehensive and is not intended to be a substitute for professional advice. Investors are advised to consult their own Tax Consultant with respect to the tax implications of an investment in the shares 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.

This certificate along with the annexure is provided solely for the purpose of assisting the addressee Company in discharging its responsibility under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 for inclusion in the Red Herring Prospectus/Prospectus in connection with the proposed offer of equity shares and is not to be used, referred to or distributed for any other purpose without our written consent.

For *S A N V Y & Associates*
Chartered Accountants,
Firm Registration No.: 131547W

Digitally signed by SAHIL VIKAS GARUD

CA Sahil Garud
Partner
Membership No.: 144395
UDIN: 26144395WRPYRP5357
Date: November 18, 2026
Place: Nashik

ANNEXURE TO THE STATEMENT OF POSSIBLE SPECIAL TAX BENEFITS AVAILABLE TO SHREYAS FABTECH LIMITED ("THE COMPANY") AND IT'S SHAREHOLDERS UNDER THE APPLICABLE TAX LAWS IN INDIA

Outlined below are the possible special tax benefits available to the Company and its shareholders as per the Income Tax Act 2025 ("IT Act") as amended from time to time and applicable for financial year 2026-27 relevant to assessment year 2027-28 (AY 2027-28) and Indirect Tax Laws as amended from time to time and applicable for financial year 2026-27. It is not exhaustive or comprehensive and is not intended to be a substitute for professional advice. Investors are advised to consult their own tax consultant with respect to the tax implications of an investment in the Equity Shares particularly since 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.

I. Under the IT Act

1. Special Tax Benefits to the Company

a) Lower corporate tax rate on income of domestic companies under Section 200 of the ITA

Pursuant to enactment of Income Tax Act, 2025 w.e.f. April 1, 2026, section 115BAA of earlier Income Tax Act, 1961 has been replaced by Section 200 under Income Tax Act, 2025. Section 200 grants an option to a domestic company to be governed by the section from a particular tax year. If a company opts for Section 200 of the Act, it can pay corporate tax at a reduced rate of 25.168% (22% plus surcharge of 10% and education cess of 4%), provided the total income of the company is computed without claiming certain specified deductions and specified brought forward losses and claiming depreciation determined in the prescribed manner.

The option to avail the concessional tax rate is available from Financial Year ("FY") 2019-20, relevant to Assessment Year ("AY") 2020-21, and is required to be exercised on or before the due date specified under Section 263(1) of the Income-tax Act, 2025 ("ITA 2025") for furnishing the return of income. The option, once exercised by filing Form 10-IC on the Income-tax e-filing portal, shall apply to subsequent tax years. A domestic company may exercise the option to avail the concessional tax rate by filing Form 10-IC on or before the due date for furnishing the return of income under Section 263(1) of the ITA 2025. Further, the provisions relating to Minimum Alternate Tax ("MAT") under Section 206 of the ITA 2025 shall not be applicable to companies opting for the concessional tax rate and, consequently, any MAT credit carried forward by such companies shall not be available for utilisation. 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.

The concessional tax rate of 22% is subject to the company not availing any of the following deductions under the provisions of the ITA:

• Section 144: Tax holiday available to units in a Special Economic Zone.
• Section 33(8): Additional depreciation.
• Section 34A: Investment allowance.
• Section 48 read with Schedule IX: Tea coffee rubber development expenses
• Section 49 read with Schedule X: Investment in site restoration fund
• Section 45 read with Schedule XIII: Expenditure on scientific research
• Section 46: Deduction for capital expenditure incurred on specified businesses
• Section 47: expenditure on agricultural extension /skill development
• Deductions under Chapter VIII except for the provisions of section 146 and section 148
• No set off of any loss carried forward or depreciation from any earlier tax year, if such loss or depreciation is attributable to any of the deductions referred above;
• No set off of any loss or allowance for unabsorbed depreciation deemed so under Section 116 of Income Tax Act, 2025, if such loss or depreciation is attributable to any of the deductions referred above.

Note: The Company has opted the lower rate under section 115BAA of the ITA.

b) Deductions in respect of employment of new employees under Section 146 of the ITA

Pursuant to enactment of Income Tax Act, 2025 w.e.f. April 1, 2026, section 80JJAA of earlier Income Tax Act, 1961 has been replaced by Section 146 under Income Tax Act, 2025. As per Section 146 of the ITA, where the gross total income of an assessee to whom the provisions relating to tax audit apply includes profits and gains derived from business, the assessee shall, subject to fulfilment of the prescribed conditions, be eligible to claim a deduction of an amount equal to 30% of the additional employee cost incurred in the course of such business during the relevant tax year. Such deduction is available for three consecutive tax years, including the tax year relevant to the tax year in which such employment is provided.

The eligibility to claim the deduction is subject to fulfilment of prescribed conditions specified in section 146 Income Tax Act, 2025. The company is presently not claiming deduction under section 146 of the Income Tax Act, 2025.

c) Deductions from Gross Total Income

- **Deduction in respect of donations section 133 of the Act:**

  The Company is entitled to claim deduction in respect of any donations made to approved funds, charitable institutions, etc. subject to satisfaction of conditions therein. However, the deduction under section 133 of the Act is not applicable if the Company opts for concessional tax regime under sections 200 of the Act.

2. Special Tax Benefits available to Shareholders

a) Dividend Income

Dividend income earned by the shareholders of the Company would be taxable in their hands at the applicable rates. However, in the case of domestic corporate shareholders, deduction under Section 148 of the Income-tax Act, 2025 ("ITA 2025") would be available, subject to fulfilment of the conditions prescribed therein. Further, in the case of shareholders who are individuals, Hindu Undivided Families, Associations of Persons, Bodies of Individuals, whether incorporated or not, and every artificial juridical person, the maximum surcharge on the tax payable on dividend income would be restricted to 15%, irrespective of the amount of dividend income.

NOTES:

- 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 potential tax consequences of the purchase, ownership and disposal of shares.

- The above statement covers only certain Special Tax Benefits under the Act, read with the relevant rules, circulars and notifications and does not cover any benefit under any other law in force in India. This statement also does not discuss any tax consequences, in the country outside India, of an investment in the shares of an Indian company.

- The above statement of Possible Special Tax Benefits is as per the current Direct Tax Laws relevant for the assessment year 2026-27. Several of these benefits are dependent on the Company or its Shareholders fulfilling the conditions prescribed under the relevant provisions of the Tax Laws.

- In respect of non-residents, the tax rates and consequent taxation mentioned above will be further subject to any benefits available under the relevant Double Taxation Avoidance Agreement, if any, entered into between India and the country in which the non-resident has fiscal domicile.

- This statement 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 or her tax advisor with respect to specific tax consequences of his/her investment in the shares of the Company.

II. Under the Indirect Tax Laws

1. Special Indirect Tax Benefits available to the Company

a) Benefits under the Central Goods and Services Act, 2017, respective State Goods and Services Tax Act, 2017, Integrated Goods and Services Tax Act, 2017 (read with relevant Rules prescribed thereunder)

- Under the GST regime, all supplies of goods and services which qualify as export of goods or services are zero-rated, that is, these transactions attract a GST rate of zero per cent.
- There are two mechanisms for claiming refund of accumulated ITC against export. Person can export under Bond/ Letter of Undertaking (LUT) as zero-rated supply and claim refund of accumulated Input Tax Credit or person may export on payment of integrated Goods and Services Tax and claim refund thereof as per the provisions of Section 54 of Central Goods and Services Tax Act, 2017.
- Thus, the GST law allows the flexibility to the exporter (which will include the supplier making supplies to SEZ) to claim refund upfront as integrated tax (by making supplies on payment of tax using ITC) or export without payment of tax by executing a Bond/LUT and claim refund of related ITC of taxes paid on inputs and input services used in making zero rated supplies.
- The Company is exporting the goods without payment of Integrated GST under LUT for the Financial Year 2024-25 and 2025-26 and is entitled to claim refund of accumulated ITC on such exports in terms of GST law.

2. Special Tax Benefits available to Shareholders

Shareholders of the Company are not eligible to special tax benefits under the provisions of the Central Goods and Services 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), 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 2015-20), Customs Act, 1962 (read with Custom Rules, circulars, notifications), Customs Tariff Act, 1975 (read with Custom Tariff Rules, circulars, notifications)

The Shareholders of the Company are not entitled to any Special Tax Benefits under indirect tax laws.

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 ACT 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.

We hereby give our consent to include our above referred opinion regarding the tax benefits available to the Company and to its shareholders in the offer document.

For *S A N V Y & Associates*
Chartered Accountants,
Firm Registration No.: 131547W

Digitally signed by SAHIL VIKAS GARUD

CA Sahil Garud
Partner
Membership No.: 144395
UDIN: 26144395WRPYRP5357

Date: 18-11-2026
Place: Nashik