



STATEMENT OF POSSIBLE SPECIAL TAX BENEFITS

Date: May 25, 2026

To

The Board of Directors

Cellcronic Technologies Limited

Shop No. 1, Opp. Newal Power House,
Petrol Pump, S.S. Kunjpura, Karnal 132023,
Haryana, India

Indcap Advisors Private Limited

Suite #1201, 12th Floor, Aurora Waterfront
GN-34/1, Sector V, Salt Lake City, Kolkata,
West Bengal, India, 700091

(Indcap Advisors Private Limited referred to as the "Lead Manager")

Dear Sir,

Sub: Proposed initial public offering of equity shares of face value ₹ 10/- each ("Equity Shares") by Cellcronic Technologies Limited("Company") (referred to as the "Offer").

We hereby confirm that the enclosed Annexures (Annexure I and Annexure II), prepared by "Cellcronic Technologies Limited", states the Special tax benefits available to the Company and to the shareholders of the Company under the Income Tax Act, 2025, the Central Goods and Services Tax Act, 2017, the Integrated Goods and Services Tax Act, 2017, the Union Territory Goods and Services Tax Act, 2017, respective State Goods and Services Tax Act, 2017 (collectively the "GST Act") presently in force in India relevant to the financial year 2025-26 and relevant to 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 Act. Hence, the ability of the Company and its shareholders to derive the tax benefits is dependent upon fulfilling such conditions, which, based on business imperatives the Company may face in the future, the Company may or may not choose to fulfill.

1. The benefits discussed in the enclosed Annexures are not exhaustive and the preparation of the contents stated is the responsibility of the Company's management. We are informed that these Annexure are only intended to provide information to the investors and are 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 consultant with respect to the specific tax implications arising out of their participation in the proposed initial public offering.
2. We do not express any opinion or provide any assurance as to whether:
 - i) the Company or its shareholders will continue to obtain these benefits in future;
 - ii) the conditions prescribed for availing the benefits have been / would be met with; and
 - iii) the revenue authorities/courts will concur with the views expressed herein.
3. The contents of the enclosed Annexure are based on information, explanations and representations obtained from the Company and on the basis of their understanding of the business activities and operations of the Company.
4. No assurance is given that the revenue authorities/ Courts will concur with the view expressed herein. Our views are based on existing provisions of law and its implementation, which are subject to change from time to time. We do not assume any responsibility to updates the views consequent to such changes.



5. We shall not be liable to any claims, liabilities or expenses relating to this assignment except to the extent of fees relating to this assignment, as finally judicially determined to have resulted primarily from bad faith or intentional misconduct. We will not be liable to any other person in respect of this statement.

This certificate 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 Draft Prospectus /Prospectus in connection with the proposed issue of equity shares and is not be used, referred to or distributed for any other purpose without our written consent.

Terms capitalized and not defined herein shall have the same meaning as ascribed to them in the Draft Prospectus/Prospectus.

For M/S G K Sureka & Co.,
Chartered Accountants
ICAI Firm Registration No.: **513018C**

Khurram Javed
Partner
Membership No: 539535
Place: New Delhi
Date: May 25, 2026
UDIN: 26539535VBRZRJ8495



ANNEXURE-I

ANNEXURE TO THE STATEMENT OF POSSIBLE DIRECT TAX BENEFITS AVAILABLE TO CELLCRONIC TECHNOLOGIES LIMITED (THE “COMPANY”), AND ITS SHAREHOLDERS

The information provided below sets out the possible special tax benefits available to the Company and the Equity Shareholders under the Income Tax Act presently in force in India. 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 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.

YOU SHOULD CONSULT YOUR OWN TAX ADVISORS CONCERNING THE INDIAN TAX IMPLICATIONS AND CONSEQUENCES OF PURCHASING, OWNING, AND DISPOSING OF EQUITY SHARES IN YOUR PARTICULAR SITUATION

I. SPECIAL TAX BENEFITS AVAILABLE TO THE COMPANY UNDER THE INCOME TAX ACT, 2025:

The Company has not availed any special tax benefits under the Income Tax Act, 2025 as on the date of this Draft Prospectus/Prospectus.

II. SPECIAL DIRECT TAX BENEFITS AVAILABLE TO THE SHAREHOLDERS UNDER THE INCOME TAX ACT, 2025:

The Shareholders of the Company are not entitled to any special tax benefits under the Act.

Note:

1. All the above benefits are as per the current tax laws and will be available only to the sole / first name holder where the shares are held by joint holders.
2. The above statement covers only certain relevant direct tax law benefits and does not cover any indirect tax law benefits or benefit under any other law.

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 Draft Prospectus/Prospectus.



ANNEXURE II

THE STATEMENT OF INDIRECT TAX BENEFITS AVAILABLE TO AVAILABLE TO CELLCRONIC TECHNOLOGIES LIMITED (THE “COMPANY”), AND ITS SHAREHOLDERS

The information provided below sets out the possible special tax benefits available to the Company and the Equity Shareholders under the Income Tax Act presently in force in India. 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 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.

YOU SHOULD CONSULT YOUR OWN TAX ADVISORS CONCERNING THE INDIAN TAX IMPLICATIONS AND CONSEQUENCES OF PURCHASING, OWNING, AND DISPOSING OF EQUITY SHARES IN YOUR PARTICULAR SITUATION

I. SPECIAL TAX BENEFIT AVAILABLE TO THE COMPANY

The Company has not availed any tax benefits under the Good and Services Tax Act, 2017 and the Rules framed therein as on the date of this Draft Prospectus/Prospectus.

II. SPECIAL TAX BENEFIT AVAILABLE TO THE SHAREHOLDERS

There are no special tax benefits available to the shareholders for investing in the shares of the Company.

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 Draft Prospectus/Prospectus.