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**STATEMENT OF SPECIAL TAX BENEFITS AVAILABLE TO FRACTAL ANALYTICS, INC. UNDER
THE TAX LAWS OF THE UNITED STATES OF AMERICA**

Date: 23 January 2026

To

The Board of Directors
Fractal Analytics Limited
Level 7, Commerz II
International Business Park, Oberoi Garden City
Off W. E. Highway, Goregaon (E)
Mumbai - 400 063
Maharashtra, India

and

Fractal Analytics Inc
Suite 76J, One World Trade Center
New York, NY 10007

Re: Proposed initial public offering of equity shares of Fractal Analytics Limited (the “Company”, and such proposed initial public offering, the “Offer”)

Subject: Statement of Special Tax Benefits (“the Statement”) available to Fractal Analytics Inc, the material subsidiary of the Company (the “Material Subsidiary”) under United States Tax laws

I, Kislay Banka, licensed Certified Public Accountant, by the California Board of Accountancy, hereby confirm that the enclosed **Annexure II** describes the special tax benefits available to Material Subsidiary (the **Statement**”), under direct and indirect taxes (together the **“Tax Laws”**), presently in force in the United States of America and as applicable to the Material Subsidiary, as described in **Annexure I**.

Certain of these benefits are dependent on the Material Subsidiary fulfilling the conditions prescribed under the relevant provisions of the Tax Laws and/or other applicable laws. Hence, the ability of the Material Subsidiary to derive these special tax benefits is dependent upon their fulfilling such conditions, which is based on business imperatives the Material Subsidiary may face in the future, and accordingly, the Material Subsidiary may or may not fulfil such conditions.

The benefits mentioned in the enclosed **Annexure II** are neither exhaustive nor conclusive. It covers only the special tax benefits available to the Material Subsidiary and does not cover general tax benefits that are available to the Material Subsidiary.

The benefits mentioned in the enclosed **Annexure II** are only intended to provide general information to investors and are neither designed nor intended to be a substitute for professional tax advice. Given 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 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 special tax benefits, which an investor can avail. Neither do we suggest, nor do we advise the investors to invest money based on this Statement.

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

- i. the Material Subsidiary will continue to obtain these special tax benefits in the future; or
- ii. the conditions prescribed for availing the special tax benefits where applicable, have been/would be met with, or
- iii. the revenue authorities will concur with the views expressed herein.

The contents of the enclosed **Annexures I and II** are based on the information, explanation, and representations obtained from the Material Subsidiary, and on the basis of our understanding of the business activities and operations of the Material Subsidiary.

We confirm that the information in this Statement is true and correct and there is no untrue statement or omission which would render the contents of this Statement misleading in its form or context.

This Statement is issued for the purpose of the Offer, and can be used, in full or part, for inclusion in the updated draft red herring prospectus, the red herring prospectus, the prospectus prepared by the Company in connection with the Offer and any other material prepared/used in connection with the Offer (together, the “**Offer Documents**”), which may be filed by the Company with SEBI, BSE Limited (“**BSE**”) and National Stock Exchange of India Limited (“**NSE**” and together with BSE, the Stock Exchanges), the registrar of companies, Maharashtra at Mumbai (“**RoC**”) and/or any other regulatory or statutory authority.

We hereby consent to our name and the aforementioned details being included in the Offer Documents and/or consent to the submission of this certificate as may be necessary, to the SEBI, RoC, Stock Exchanges, and/or any regulatory/statutory authority as may be required and/or for the records to be maintained by the Book Running Lead Managers in connection with the Offer and in accordance with applicable laws.

We consent to the inclusion of our names as “experts” in the Offer Documents as defined under Section 2(38) of the Companies Act 2013 read with the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended, in respect of the Statement issued by us.

This certificate may be relied on by the Company, the Book Running Lead Managers, their affiliates, and the legal counsel to each of the Company and the Book Running Lead Managers appointed in relation to the Offer and to assist the Book Running Lead Managers in conducting and documenting their investigation of the affairs of the Company in connection with the Offer. We hereby consent to this Statement being disclosed by the Book Running Lead Managers, if required (i) by reason of any law, regulation, order or request of a court or by any governmental or competent regulatory authority, or (ii) in seeking to establish a defence in connection with, or to avoid, any actual, potential or threatened legal, arbitral or regulatory proceeding or investigation.

We confirm that we are an independent firm, and are not related to the Company, its Promoters, the members of the Promoter Group, its Subsidiaries, its Directors, its Key Managerial Personnel, and its Senior Management. We further confirm that we are not and have not been engaged or interested in the formation or promotion or management of the Company. We also consent to the inclusion of this certificate as a part of the “*Material Contracts and Documents for Inspection*” in connection with this Offer, which will be available to the public for inspection from the date of the filing of the red herring prospectus until the Bid / Offer Closing Date. This certificate can also be uploaded on the repository portal of the Stock Exchanges / SEBI as required pursuant to the SEBI circular dated December 5, 2024, and the subsequent requirements of the Stock Exchanges / SEBI, as applicable.

We undertake to immediately communicate, in writing, any changes to the above information/confirmations, as and when: (i) made available to us; or (ii) we become aware of any such changes, to the Book Running Lead Managers and the Company until the Equity Shares allotted in the Offer commence trading on the Stock Exchanges. In the absence of any such communication from us, the Company, the Book Running Lead Managers and the legal advisors appointed with respect to Offer can assume that there is no change to the information/confirmations forming part of this certificate and accordingly, such information should be considered to be true and correct.

All capitalized terms used but not defined herein shall have the meaning assigned to them in the Offer Documents.

Yours Sincerely,

For Chugh CPAs LLP



Kislay Banka

Partner

Place of Signature: Santa Clara, California (USA)

Date: 23 January 2026

ANNEXURE I**LIST OF TAX LAWS**

Sr No.	Details of Tax Laws
1.	Internal Revenue Code of 1986 (IRC) - Title 26 of the United States Code (26 USC)
2.	Treasury Regulations issued by the U.S. Department of the Treasury

ANNEXURE II

Statement of Special Tax Benefit available to Material Subsidiary under tax laws of the United States of America

A. Direct Tax Laws

1. Consolidated US Federal Tax Return:

IRC Section 1501

Privilege to file a consolidated tax return with respect to the US federal income tax imposed by Chapter 1 of Subtitle A of the Internal Revenue Code of 1986, as amended (the “Code”), under Code section 1501, in lieu of separate federal US income tax returns for each relevant US corporation is available to the Company. For certain purposes, such consolidated filing permits the various members of the consolidated group to be treated as a single entity for Federal income tax purposes.

2. Global Intangible Low Taxed Income Deduction:

IRC Section 951A & Sec 250

The Global Intangible Low-Taxed Income (GILTI) Deduction is a key component of the tax reforms introduced by the Tax Cuts and Jobs Act (TCJA) of 2017. Its purpose is to address the issue of U.S. multinational corporations shifting profits to foreign subsidiaries in low-tax jurisdictions. The income inclusion under IRC Section 951A and corresponding deduction under Section 250 is designed to reduce the tax burden on foreign earnings that qualify as GILTI, making the U.S. tax system more competitive with international tax regimes.

The Material Subsidiary and its foreign subsidiaries are classified as Controlled Foreign Corporations (“CFCs”). As part of the Consolidated U.S. Group, each CFC’s GILTI is included in the group’s gross income on an annual basis. This GILTI income is subject to the standard 21% U.S. Federal Corporate Income Tax rate.

Under Section 250, The Material Subsidiary and its foreign subsidiaries may be eligible for a 50% deduction on their GILTI income inclusion each year, which could effectively reduce the U.S. tax rate on GILTI to 10.5%

Pursuant to the enactment of “The One Big Beautiful Bill Act” (OBBA) which will apply to the Company for GILTI Income from taxable Year beginning April 1, 2026, Key impact is removal of deduction available for Net deemed tangible income return and reduces the deduction available under Section 250 for net CFC Tested Income to 40%, resulting in 12.6% effective tax rate

3. Foreign Tax Credit:

The Foreign Tax Credit (FTC) is a U.S. tax benefit designed to prevent double taxation on income that is taxed both by a foreign country and by the U.S. government. If a U.S. entity pays taxes to a foreign government on income earned abroad, the FTC allows that entity to offset its U.S. tax liability by claiming a credit for the foreign taxes paid. If the FTC exceeds the U.S. tax liability in a given year, the entity may carry the unused portion back one year or forward up to 10 years.

This can be a significant advantage for the Material Subsidiary, as it reduces the possibility of double taxation on international earnings.

FTC in the US for 80% of foreign taxes paid or accrued on the above-referenced net GILTI inclusion under Section 951A is available to the Material Subsidiary.

OBBB increases the GILTI allowance to 90% i.e. disallows 10% of the deemed paid FTC allowed for distributions of previously taxed net CFC tested income. Accordingly, no residual U.S. tax would be owed on income subject to a 14% foreign tax rate.

4. Bonus Depreciation – IRC Section 168(k)

The Material Subsidiary may be eligible for a 100% deduction of the cost of qualifying tangible property, provided the property has a useful life of 20 years or less, as additional depreciation for property placed in service between 2018 and 2022.

The deduction rate will decrease to 80% in 2023, then to 60% in 2024, 40% in 2025, and 20% in 2026. After 2026, the deduction will expire unless extended by legislation in future.

OBBB permanently reinstates 100% bonus depreciation for most qualified property acquired after January 19, 2025.

5. Consolidated/Combined State Tax Returns:

Code Section / Ruling: Various state laws

Privilege to file a consolidated/combined state tax return in various jurisdictions with respect to the income tax imposed by various state laws is available to the Material Subsidiary.

B. Indirect Tax Laws

There are no possible special indirect tax benefits available to the Material Subsidiary.

Notes:

These Annexure sets out the possible special tax benefits available to the Material Subsidiary, in the United States of America.

No assurance is given that revenue authorities or courts will concur with the views expressed herein. Our views are based on the existing provisions of law and applicable interpretations thereof, which are subject to change from time to time. We do not assume responsibility to update the views subsequent to such changes.

This statement covers only certain possible special tax benefits, read with the relevant rules, regulations, and guidance in force in the United States. This statement also does not discuss any tax consequences in any country outside the United States, of an investment in the shares of a United States entity.

The above statement of possible special tax benefits is as per the current tax laws and several of these benefits are dependent on Material Subsidiary or its shareholders satisfying the conditions prescribed under the relevant provisions of the Code and/or other applicable law.

This Annexure is intended only 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 tax consequences, each investor is advised to consult his/her own tax advisor with respect to specific tax arising out of their participation in the Offer.