

# kkc & associates llp

Chartered Accountants

(formerly Khimji Kunverji & Co LLP)

To,  
The Board of Directors  
Blue Jet Healthcare Limited  
(formerly known as Blue Jet Healthcare Private Limited)  
701, 702, 7<sup>th</sup> Floor, Bhumiraj Costarica  
Sector 18, Sanpada, Navi Mumbai,  
Thane – 400705, Maharashtra

**Re: Proposed initial public offering of equity shares of Rs. 2 each (“Equity Shares”) by Blue Jet Healthcare Limited (formerly known as Blue Jet Healthcare Private Limited) (the “Company”) (the “Offer”)**

Dear Sirs,

We, KKC & Associates LLP (formerly Khimji Kunverji & Co LLP), Chartered Accountants, the statutory auditor of the Company, enclose herewith the statement in Annexure A prepared by the management of the Company and stamped by us for identification purpose showing the current positions of special tax benefits available to the Company and its shareholders, under the Income-tax Act, 1961, the Central Goods and Services Tax Act, 2017, the Integrated Goods and Services Tax Act, 2017, respective State Goods and Services Tax Act, 2017, Customs Act, 1962 and the Customs Tariff Act, 1975, each as amended (collectively the “Taxation Laws”), presently in force in India for inclusion in the red herring prospectus and the prospectus (“Offer Documents”) in connection with the Offer.

Several of these stated tax benefits/consequences are dependent on the Company or its shareholders fulfilling the conditions prescribed under the relevant tax laws. Therefore, the ability of the Company or its shareholders to derive the tax benefits is dependent on fulfilling such conditions.

The benefits discussed in the enclosed Annexure A are not exhaustive and cover the possible special tax benefits available to the Company and its shareholders and do not cover any general tax benefits available to the Company and its shareholders. Further, the preparation of the enclosed Annexure A and its contents are the responsibility of the management of the Company. The attached Annexure A is for your information only 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 own tax consultant with respect to the specific tax implications arising out of their participation in the Offer. Neither are we suggesting nor advising the investor to invest money based on this statement.

We conducted our examination in accordance with the “Guidance Note on Reports or Certificates for Special Purposes (Revised 2016)” (the “Guidance Note”) issued by the Institute of Chartered Accountants of India. We have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, Quality Control for firms that perform audits and reviews of Historical Financial information, and Other Assurance and Related Service Engagements.

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; or
- ii) the conditions prescribed for availing the benefits have been/would be met with.
- iii) the revenue authorities/courts will concur with the views expressed herein.

The contents of the enclosed statement 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.



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We hereby give our consent to include this statement and the Annexure regarding the special tax benefits available to the Company and the Shareholders of the Company in the Offer Documents for the proposed Offer which the Company intends to submit to the Securities and Exchange Board of India, the Registrar of Companies, Maharashtra at Mumbai and the stock exchanges where the equity shares of the Company are proposed to be listed, provided that the below statement of limitation is included in the offer documents.

## Limitations:

Our views expressed in the statement enclosed are based on the facts and assumptions indicated to us. 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 the Taxation Laws 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. We shall not be liable to the Company for any claims, liabilities, or expenses relating to this assignment.

All capitalized terms not defined hereinabove shall have the same meaning as defined in the Offer Documents.

Sincerely,

For **KKC & Associates LLP**

Chartered Accountants

(formerly Khimji Kunverji & Co LLP)

Firm Registration Number: 105146W/ W100621

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**Kamlesh R. Jagetia**

Partner

Membership No.: 139585

UDIN: 23139585BGXMFN6437



Place: Mumbai

Date: October 09, 2023

Encl: Statement of Special Tax Benefits

## Annexure A

ANNEXURE TO THE STATEMENT OF POSSIBLE SPECIAL DIRECT TAX BENEFIT AVAILABLE TO THE COMPANY AND ITS SHAREHOLDERS.

Outlined below are the possible tax benefits available to the Company and its shareholders under the current direct tax laws currently in force in India. These tax benefits are dependent on the Company and its shareholders fulfilling the conditions prescribed under the relevant provisions of the Income Tax Act, 1961 ("the IT Act"). Hence, the Company and its shareholders can derive the possible tax benefits upon fulfilling such conditions laid down in the IT Act, which are based on business imperatives they face in the future, they may or may not choose to fulfill.

### Special Tax Benefits to the Company under the IT Act

The Company is not entitled to any special tax benefits under the IT Act.

### Special Tax Benefits to the Shareholders of the Company under the IT Act

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

#### Note:

- a. The above Statement set out 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.
- b. The above statement covers only certain relevant direct tax law benefits and does not cover any benefit under any other law.
- c. 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/her own tax advisor with respect to specific tax consequences of his/her investment in the shares of the Company.
- d. 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 changes from time to time.
- e. In respect of non-residents, the tax rates and the consequent taxation shall be further subject to any benefits available under the applicable Double Taxation Avoidance Agreement, if any, between India and the country in which the non-resident has fiscal domicile.

For **Blue Jet Healthcare Limited**

(formerly known as Blue Jet Healthcare Private Limited)

**Shiven Akshay Arora**  
**Managing Director**

Date: October 09, 2023

Place: Navi Mumbai



ANNEXURE TO THE STATEMENT OF POSSIBLE SPECIAL INDIRECT TAX BENEFIT AVAILABLE TO THE COMPANY AND ITS SHAREHOLDERS.

Outlined below are the possible tax benefits available to the Company and its shareholders under the current indirect tax laws currently in force in India. These tax benefits are dependent on the Company and its shareholders fulfilling the conditions prescribed under the relevant provisions of the Central Goods and Services Tax Act, 2017, the Integrated Goods and Services Tax Act, 2017, respective State Goods and Services Tax Act, 2017, Customs Act, 1962 and the Customs Tariff Act, 1975 (collectively "the Acts"). Hence, the Company and its shareholders can derive the possible tax benefits upon fulfilling such conditions laid down in the Acts which are based on business imperatives they face in the future, they may or may not choose to fulfill.

**Special Tax Benefits to the Company under the Acts**

The Company is not entitled to any special tax benefits under the Acts.

**Special Tax Benefits to the Shareholders of the Company under the Acts**

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

**Note:**

- a. The above Statement set out 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.
- b. The above statement covers only certain relevant indirect tax law benefits and does not cover any benefit under any other law.
- c. 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/her own tax advisor with respect to specific tax consequences of his/her investment in the shares of the Company.
- d. 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 changes from time to time.

For **Blue Jet Healthcare Limited**  
(formerly known as Blue Jet Healthcare Private Limited)

**Shiven Akshay Arora**  
Managing Director  
Date: October 09, 2023  
Place: Navi Mumbai

