

## STATEMENT OF SPECIAL TAX BENEFITS (Under Direct and Indirect tax laws) FOR MLO K.K.

The Board of Directors  
MLO K.K.  
2-1-12 3F Matsuyama,  
Naha, Okinawa, Japan, 9000032

Dear Sirs,

### Statement of Special Tax Benefits available to MLO K.K. under the Japan tax laws

1. We hereby confirm that the enclosed Annexure, prepared by MLO K.K. ('the Company'), provides the special tax benefits available to the Company under the Corporation Tax Act [(“the Corporation Tax Act”), i.e. applicable for the Financial Year 2025-26, the Consumption Tax Act (“Consumption Tax Act”) and the Customs Act (“Customs Act”), i.e., applicable for the Financial Year 2025-26, presently in force in Japan. Several of these benefits are dependent on the Company fulfilling the conditions prescribed under the relevant provisions of the Act. Hence, the ability of the Company to derive the tax benefits is dependent upon their fulfilling such conditions which, based on business imperatives the Company faces in the future, the Company may or may not choose to fulfil.
2. 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 the Annexures 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 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 offer of equity shares of the Company (“**Offer**”).
3. We do not express any opinion or provide any assurance as to whether:
  - i) the Company 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.
4. The contents of the enclosed Annexures 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.
5. This Statement is issued solely in connection with the proposed Offer of the Company and can be included in the draft red herring prospectus, red herring prospectus and prospectus proposed to be filed by the Company or any other offer documents prepared/materials used in connection with the Offer with the relevant regulatory/statutory authorities and is not to be used, referred to or distributed for any other purpose. We have no responsibility to update this Statement for events and circumstances occurring after the date of this Statement.
6. We consent to the inclusion of our names as “experts” in the Offer Documents as required under Section 26 (1) of the Companies Act 2013 read with the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended, and under Section 2(38) of the Companies Act 2013 in respect of the letters issued by us. However, we should not be construed to be “expert” as defined under the U.S. Securities Act of 1933.

For NoHara Audit Corporation  
Certified Public Accountants  
Corporate Number: 9120005022234



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**per Yusuke Kobayashi**  
Partner  
Certified Public Accountant of Japan  
Certified Public Tax Accountant of Japan

Place: Osaka, Japan  
Date: 15 October 2025

## **Annexure**

### **Possible special tax benefits for MLO K.K.**

#### **Special tax benefits available to the Company under the Corporation Tax Act**

- The Company is not entitled to any special tax benefit under the Corporation Tax Act.

#### **Special tax benefits available to the Company under the Consumption Tax Act and the Customs Act**

- The Company is not entitled to any special tax benefit under the Consumption Tax Act and the Customs Act.

## STATEMENT OF SPECIAL TAX BENEFITS (Under Direct and Indirect tax laws) FOR OWNDAYS CO., LTD.

The Board of Directors  
OWNDAYS CO., LTD.  
27F Sphere Tower Tennouzu,  
2-2-8 Higashi-Shinagawa,  
Shinagawa, Tokyo, Japan, 140002

Dear Sirs,

### Statement of Special Tax Benefits available to OWNDAYS CO., LTD. under the Japan tax laws

1. We hereby confirm that the enclosed Annexure, prepared by OWNDAYS CO., LTD. ('the Company'), provides the special tax benefits available to the Company under the Corporation Tax Act ("the Corporation Tax Act"), i.e. applicable for the Financial Year 2025-26, the Consumption Tax Act ("Consumption Tax Act") and the Customs Act ("Customs Act"), i.e., applicable for the Financial Year 2025-26, presently in force in Japan. Several of these benefits are dependent on the Company fulfilling the conditions prescribed under the relevant provisions of the Act. Hence, the ability of the Company to derive the tax benefits is dependent upon their fulfilling such conditions which, based on business imperatives the Company faces in the future, the Company may or may not choose to fulfil.
2. 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 the Annexures 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 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 offer of equity shares of the Company ("**Offer**").
3. We do not express any opinion or provide any assurance as to whether:
  - i) the Company 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.
4. The contents of the enclosed Annexures 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.
5. This Statement is issued solely in connection with the proposed Offer of the Company and can be included in the draft red herring prospectus, red herring prospectus and prospectus proposed to be filed by the Company or any other offer documents prepared/materials used in connection with the Offer with the relevant regulatory/statutory authorities and is not to be used, referred to or distributed for any other purpose. We have no responsibility to update this Statement for events and circumstances occurring after the date of this Statement.
6. We consent to the inclusion of our names as "experts" in the Offer Documents as required under Section 26 (1) of the Companies Act 2013 read with the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended, and under Section 2(38) of the Companies Act 2013 in respect of the letters issued by us. However, we should not be construed to be "expert" as defined under the U.S. Securities Act of 1933.

For NoHara Audit Corporation  
Certified Public Accountants  
Corporate Number: 9120005022234



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**per Yusuke Kobayashi**  
Partner  
Certified Public Accountant of Japan  
Certified Public Tax Accountant of Japan

Place: Osaka, Japan  
Date: 15 October 2025

**Annexure**

**Possible special tax benefits for OWNDAYS CO., LTD.**

**Special tax benefits available to the Company under the Corporation Tax Act**

- The Company is not entitled to any special tax benefit under the Corporation Tax Act.

**Special tax benefits available to the Company under the Consumption Tax Act and the Customs Act**

- The Company is not entitled to any special tax benefit under the Consumption Tax Act and the Customs Act.