

Shraddha Jain
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ANNEXURE IV

Confirmation by the Statutory Auditors/ Practicing Chartered Accountant/ Practicing Company Secretary:

To,
The Chief General Manager,
Listing Operation,
BSE Limited,
20th Floor, P. J. Towers,
Dalal Street,
Mumbai - 400 001.

Dear Sir,

Sub: Application for "In-principle approval" prior to issue and allotment of 3,50,000 convertible warrants on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

I, CS Shraddha Jain, Practicing Company Secretary have verified the relevant records and documents of **SHREE PACETRONIX LIMITED** with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

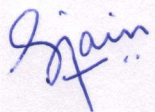
- a) None of the proposed allottee(s) has/ have sold any equity shares of the company during the six months period preceding the relevant date. Further, where the proposed allottee(s) is promoter/ promoter group entity, then none of entities in the promoter and promoter group entities has/ have sold any equity share of the company during the six-month period preceding the relevant date.
- b) The pre-preferential shareholding of each of proposed allottee(s) has been locked in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018. Further, there is no sale/ pledge of pre-preferential holding from Friday, 15th July, 2022 till 28th February 2023.

The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

| Name of the Proposed Allottee | DP ID * | Qty | Lock-in details | |
|-------------------------------|----------|--------|-----------------|------------|
| | | | From | To |
| Mr. Akash Sethi | 12043000 | 12,699 | 25.07.2022 | 28.02.2023 |

(*) Client ID/ folio no in case allottee hold the securities in physical form

- c) None of the proposed allottees belonging to promoter(s) or the promoter group is ineligible for allotment in terms of Regulations 159 of SEBI (ICDR) Regulations, 2018.
- d) The proposed issue is being made in accordance with the requirements of Chapter V of SEBI (Issue of Capital and Disclosure Requirement) Regulations, 2018, Section 42 and 62 of the Companies Act 2013 and Rule 14 of the Companies (Prospectus and Allotment of Securities) Rules, 2014 and other requirements of Companies Act, 2013. Further, the


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company has complied with all legal and statutory formalities and no statutory authority has restrained the company from issuing these proposed securities.

- e) The proposed preferential issue is being made in compliance with the provisions of Memorandum of Association (MoA) and Article of Association (AoA) of the company. It is further confirmed that for the proposed preferential issue, the price of the equity shares of the company has been determined in compliance with the valuation requirement as mentioned in the AoA of the company."

For Name of the Auditor/ Practicing Company Secretary

CS SHRADDHA JAIN
Membership No: 39488
UDIN: A039488D000686365
Date:26.07.2022

 **SHRADDHA JAIN**
PRACTISING COMPANY SECRETARY
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