

# Shraddha Jain

Practicing Company Secretary  
107, Gold Arcade,  
3 /1, New Palasia,  
Indore (MP), India - 452003  
Phone: (0731) 2535841  
E-mail: shraddhajain2204@gmail.com

Date: August 08, 2025

To,  
The Chief General Manager  
Listing Operation,  
BSE Limited,  
20th Floor, P.J. Towers,  
Dalal Street, Mumbai – 400001

**Sub: Application for “In-Principle Approval” for issue and allotment of 75,150 (Seventy Five Thousand One Hundred Fifty) equity shares (“Equity Shares”) and 2,25,450 (Two Lakhs Twenty Five Thousand Four Hundred Fifty) warrants convertible into equity shares (“Warrants”) by Shree Pacetronix Limited (the “Company”) in terms of Chapter V of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) Regulation, 2018, as amended (“SEBI ICDR Regulations”).**

Scrip Code: 527005

Dear Sir/Ma’am,

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:

- None of the proposed allottee(s) has sold any equity shares of the company during the 90 trading days 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 sold any equity share of the company during the 90 trading days preceding the relevant date.
- Mr. Akash Sethi does not hold any equity shares of the Company for a period starting from the relevant date till the date of preferential allotment: **Not Applicable, as he holds 12,699 equity shares as on Relevant Date.**
- The pre-preferential shareholding of each of the proposed allottee has been locked in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018. Further, there is no sale/ pledge of pre-preferential holding from August 07, 2025 till March 31, 2026. The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

Name of Proposed Allottees	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
Akash Sethi	12043000	12,699	August 07, 2025	March 31, 2026	N.A.	N.A.

(\* ) client id/ folio no in case the allottee hold the securities in physical form.

SHRADDHA JAIN  
PRACTISING COMPANY SECRETARY  
ACS: 39488 CP: 14710  
107, GOLD ARCADE  
OPP. CUREWELL HOSPITAL  
NEW PALASIA, INDORE (M.P.)

# Shraddha Jain

Practicing Company Secretary  
107, Gold Arcade,  
3 /1, New Palasia,  
Indore (MP), India - 452003  
Phone: (0731) 2535841  
E-mail: shraddhajain2204@gmail.com

- d) 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.
- e) 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 Company has complied with all legal and statutory formalities, and no statutory authority has restrained the Company from issuing these proposed securities.
- f) 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 - **Not applicable, as no pricing method specified in the AOA of the Company.**
- g) The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e. 2025-26 is more than 5% of the post issue fully diluted share capital of the issuer.

  
**SHRADDHA JAIN**  
PRACTISING COMPANY SECRETARY  
MCS- 39488 CP: 14717,  
107, GOLD ARCADE  
OPP. CUREWELL HOSPITAL  
NEW PALASIA, INDORE (M.P.)  
CS Shraddha Jain  
Practicing Company Secretary  
Membership No.: 39488  
CP No.: 14717  
PR.: 1765/2022  
UDIN: A039488G000969527

Date: 08<sup>th</sup> August, 2025

Place: Indore