

**REVISED CERTIFICATE****Annexure IV**

The Chief General Manager  
Listing Operation,  
BSE Limited,  
20<sup>th</sup> Floor, P. J. Towers,  
Dalal Street,  
Mumbai – 400 001.

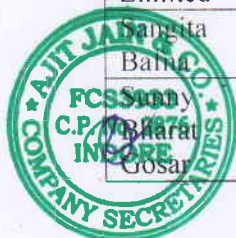
Dear Sir,

**Sub: Application for “In-principle approval” for issue and allotment of 94,61,480 Warrants of Rs. 158.50 each convertible into Equity Shares of Rs. 1/- each at a premium of Rs. 157.50 for every warrant to be issued on a preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.**

We, Ajit Jain proprietor of Ajit Jain & Co., Practicing Company Secretary (FRN: S1998MP023400, M.No: F3933, C.P. No: 2876), have verified the relevant records and documents of **Kriti Industries (India) 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 share of the company during the 90 trading days preceding the relevant date. Further, where the proposed allottee(s) is/ are 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 90 trading days preceding the relevant date.
- b) (i) **Rajnish Bahl**; (ii) **Madhuri Madhusudan Kela**; (iii) **Pallavi Dhoot**; (iv) **Pushap Raj Singhvi**; (v) **Sumit Bhalotia**; (vi) **Siddharth Shah**; (vii) **Tushar Pradeep Bohra** does not hold any equity share of the issuer for a period starting from the relevant date till the date of preferential allotment.
- c) 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 (Relevant Date) till (date of lock-in). The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

Name of Proposed Allottee	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
Sakam Trading Private Limited	IN30611421055634	3,04,75,702	03/07/2024	31/12/2024	N.A.	N.A.
Kriti Nutrients Limited	IN30198311584365	1,97,519	03/07/2024	31/12/2024	N.A.	N.A.
Bangita Bama	IN30115112653642	6,000	03/07/2024	31/12/2024	N.A.	N.A.
Siddhy Bhatnagar Gosar	1206290000118449	32,500	21/06/2024	31/12/2024	N.A.	N.A.



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

Note:-

- (1) Lock-in does not commence from the relevant date, those proposed allottee(s) having pre-preferential holdings have not sold any share of the issuer from the relevant date till the date of commencement of lock-in. Further, the issuer shall extend the pre-preferential lock-in, whenever required in order to comply with the Regulation 167(6) of the ICDR Regulations, 2018 and amendments thereof.
- 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.”
- 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. 2024-25 is more than 5% of the post issue fully diluted share capital of the issuer.

OR

~~The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e. \_\_\_\_\_ is less than 5% of the post issue fully diluted share capital of the issuer.~~

For, Ajit Jain & Co.,  
Practicing Company Secretaries  
PCS Unique ID: S1998MP023400



A. K. Jain

CS Ajit Jain  
M. No: F3933  
C.P. No: 2876  
Peer Review No: 767/2020  
UDIN: F003933F000718781  
Date: 11/07/2024  
Place: Indore

# AJIT JAIN

M.Com, L.L.B. (Hons.), FCS

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# AJIT JAIN & CO.

COMPANY SECRETARIES

'PREM VILLA' 84, Kailash Park Colony,

Near Geeta Bhawan, INDORE-452 001

Annexure IV

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BSE Limited,  
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- None of the proposed allottee(s) has/ have sold any equity share of the company during the 90 trading days preceding the relevant date. Further, where the proposed allottee(s) is/ are 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 90 trading days preceding the relevant date.
- (i) Rajnish Bahl; (ii) Madhuri Madhusudan Kela; (iii) Pallavi Dhoot; (iv) Pushap Raj Singhvi; (v) Sumit Bhalotia; (vi) Siddharth Shah; (vii) Tushar Pradeep Bohra** does not hold any equity share of the issuer for a period starting from the relevant date till the date of preferential allotment.
- 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 (Relevant Date) till (date of lock-in). The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

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Sunny Bharat Gosar	1206290000118449	32,500	22/06/2024	31/12/2024	N.A.	N.A.

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

Note:-





- (1) Lock-in does not commence from the relevant date, those proposed allottee(s) having pre-preferential holdings have not sold any share of the issuer from the relevant date till the date of commencement of lock-in. Further, the issuer shall extend the pre-preferential lock-in, whenever required in order to comply with the Regulation 167(6) of the ICDR Regulations, 2018 and amendments thereof.
- (2) The company has executed Corporate Action for Lock-in of pre-preferential holding of allottees in NSDL. However, confirmation for execution of lock-in from the NSDL is awaited.
- 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.”
- 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. 2024-25 is more than 5% of the post issue fully diluted share capital of the issuer.

OR

The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e. \_\_\_\_\_ is less than 5% of the post issue fully diluted share capital of the issuer.

**For, Ajit Jain & Co.,  
Practicing Company Secretaries  
PCS Unique ID: S1998MP023400**

*A. K. Jain*

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C.P. No: 2876  
Peer Review No: 767/2020  
UDIN: F003933F000604764  
Date: 22/06/2024  
Place: Indore**

