



Date: October 27, 2022

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

Sub: Application for “In-principle approval” prior to issue and allotment of 2,89,600 Equity shares and 6,30,170 Fully Convertible Warrants by PTC Industries Limited (“the Company”) issued on a preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

Dear Sir,

We, Amit Gupta & Associates, Company Secretaries, have verified the relevant records and documents of **PTC Industries Limited** with respect to the proposed captioned preferential issue of Equity Shares and Warrants 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 90 trading days preceding the relevant date (October 20, 2022).

~~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) 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 the relevant date, i.e., October 20, 2022 till the date of lock-in. The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder –

S. No.	Name of the Proposed Allottee	DP ID	Qty	Lock-in details	
				From	To
1.	AG Dynamic Funds Limited	-	0	NA	NA
2.	Ajinkya Mercantile Private Limited	-	0	NA	NA
3.	Aniruddha Shyam Lakhani	-	0	NA	NA
4.	Anup Gupta	-	0	NA	NA
5.	Anuradha Khan	-	0	NA	NA
6.	Chetan Navinchandra Shah	-	0	NA	NA
7.	Chhatisgarh Investments Limited	-	0	NA	NA
8.	Deepak K Mehta	-	0	NA	NA
9.	Dhruv Narayan Purohit	-	0	NA	NA
10.	Girish Sareen	IN30011811271474	26,658	Under process	Under process
11.	Harsh Sarwankumar Saraf	-	0	NA	NA
12.	Hemlatha Raghava Suvarna	-	0	NA	NA
13.	Hiten Popatlal Shah	1202890000812901	1,971	Under process	Under process
14.	Hypotenuse Investments	-	0	NA	NA
15.	Jasbir Singh Chouhan	IN30018312503977	2,717	Under process	Under process
16.	Jignesh Patel	1205810000251210	3,470	Under process	Under process
17.	JVS Comatsco Industries Pvt Ltd	-	0	NA	NA
18.	Kailash Dinodia	1208160051233831	5,149	Under process	Under process
19.	Krishna Kumar Daga	-		NA	NA
20.	Lalit Agrawal	1202890000182769	4,095	Under process	Under process
21.	Mala Sareen	-	0	NA	NA
22.	Megha Dhamija	-	0	NA	NA

23.	Mukul Saxena	-	0	NA	NA
24.	Pankaj Prasoon	1202350000341002	1,05,497	Under process	Under process
25.	Prakash Sarada	-	0	NA	NA
26.	Pranav Krishnakumar Lilani	-	0	NA	NA
27.	QRG Investments and Holdings Limited	-	0	NA	NA
28.	Rajkumar Ramaswamy	-	0	NA	NA
29.	Ramesh Kumar Sharma	-	0	NA	NA
30.	Rekha Daga	1201090016245765	6,215	Under process	Under process
31.	Renu Krishnakumar Daga	-	0	NA	NA
32.	Riti Foundation	-	0	NA	NA
33.	R R Foundation	-	0	NA	NA
34.	Sanika Shilotri	-	0	NA	NA
35.	Sanjeevani Holdings Private Limited	-	0	NA	NA
36.	Satyen Vallabhnbhai Patel	1205810000230777	33,548	Under process	Under process
37.	Sawtanter Kumar	-	0	NA	NA
38.	Shashi Bhushan Prasad	-	0	NA	NA
39.	Shivam Shyam Dhawan	-	0	NA	NA
40.	Snehal Shah	IN30216410424823	35,831	Under process	Under process
41.	S R Foundation	-	0	NA	NA
42.	Sumitra Kukreja	-	0	NA	NA
43.	Sunil Srinivasan Chari	-	0	NA	NA
44.	Sunil Kumar Kothari (HUF)	-	0	NA	NA
45.	Sunita Shravan Kumar Saraf	-	0	NA	NA
46.	Suruchi Foundation	-	0	NA	NA
47.	Swati Foundation	-	0	NA	NA
48.	Tamanna Sarada	-	0	NA	NA
49.	Taori Amol Babulalji HUF	1202350000351836	7,678	Under process	Under process
50.	Tarun Kumar Khatri	-	0	NA	NA

	HUF				
51.	Ten Eighty Investments	-	0	NA	NA
52.	Tuljaram Maheshwari	-	0	NA	NA
53.	Vallabh Lalji Patel	1205810000249674	3,644	Under process	Under process
54.	Vasusri Jhaver	-	0	NA	NA
55.	Vipul Vallabh Patel	-	0	NA	NA
56.	White Pine Investment Management Private Limited	-	0	NA	NA
57.	Wow Investments	-	0	NA	NA
58.	Sharad Goel	-	0	NA	NA

- 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. **Not Applicable**
- 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 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.
- f) The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e. 2022-2023 is less than 5% of the post issue fully diluted share capital of the issuer-



**For Amit Gupta & Associates
Company Secretaries**

Amit Gupta

Practising Company Secretary

Membership No. : F5478

C. P. No. 4682

UDIN - **F005478D001373768**

Date: October 27, 2022

Place: Lucknow