



JAYMEEN TRIVEDI AND ASSOCIATES

Company Secretaries & Trademark Agent
B-1011, Sivanta One Business Park,
Nr. Paldi Cross Roads, Paldi,
Ahmedabad - 380007
(M) +91-9328222069 - (O)+91-79-27542504
email - jtrivedi86@gmail.com

Annexure IV

Format of the confirmation to be submitted by the Practicing Company Secretary on their letterhead:

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

Dear Sir,

Sub: Application for “In-principal approval” prior to issue and allotment 5870600 Equity Shares on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

I, JAYMEEN TRIVEDI & ASSOCIATES, Practicing Company Secretary have verified the relevant records and documents of SACHETA METALS 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) have sold any equity shares of the company during the 90 trading days preceding the relevant date. Further, none of entities in the promoter and promoter group entities 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 (Relevant Date) till (date of lock-in). The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder: Not applicable as there is no lock in shares of the proposed allottees.



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Name of the Proposed Allottee	DP ID *	Qty	Lock-in details	
			From	To
SATISHKUMAR K SHAH	IN303052	3681616	-	-
CHETNABEN S SHAH	IN303052	3171695	-	-
ANKIT S SHAH	IN303052	1610053	-	-
PRANAV S SHAH	IN303052	1307303	-	-
CHANDRAKANT SHAH	12071000	0	-	-
CHANDRAKANT SHAH	IN301151	0	-	-
CHANDRAKANT SHAH-HUF	12071000	0	-	-
JYOTSNA SHAH	12071000	0	-	-
JYOTSNA SHAH	IN301151	0	-	-
NEENABEN VAKHARIA	IN303052	16	-	-
RINKESH VAKHARIA	IN303052	0	-	-
ATULBHAI	IN303052	0	-	-
JINESH	IN303052	0	-	-
PIYUSH POPATLAL SHAH HUF	12051500	0	-	-
KAMLESH P SHAH HUF	12051500	0	-	-
BHAVESH P SHAH HUF	12051500	0	-	-
KAMLESH P SHAH HUF	12051500	0	-	-
RUTVI K SHAH	12051500	0	-	-
MEGHNA B SHAH	12051500	0	-	-
PRAPTI B SHAH	12051500	0	-	-

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



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- 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.*

(MOA-AOA of the company are as per The Companies Act, 1956 which will be amended and adopted subject to approved by the members at the ensuing general meeting).

- ~~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. 2023-2024 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. 2023-2024 is less than 5% of the post issue fully diluted share capital of the issuer.

**FOR, JAYMEEN TRIVEDI & ASSOCIATES
COMPANY SECRETARIES**

**JAYMEEN TRIVEDI
PROPRITOR
MEM NO: 9137
COP: 10035
UDIN: F009137E000048242
Date: 10.04.2023**