

# Vishwas Sharma & Associates

COMPANY SECRETARIES

## 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" prior to issue and allotment of 26,04,000 (Twenty Six Lacs Four Thousand) equity shares on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.**

I, Vishwas Sharma, Proprietor of Vishwas Sharma & Associates, Practising Company Secretaries, have verified the relevant records and documents of Achyut Healthcare Limited with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

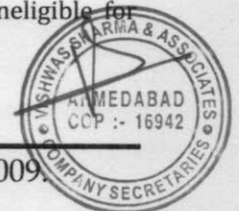
- a) None of the proposed allottees has/ have sold any equity shares of the company during the 90 trading days preceding the relevant date. Further, where the proposed allottee(s) is/ are promoter/ promoter group entity, then none of entities in the promoter and promoter group entities has/ have sold any equity share of the company during the 90 trading days preceding the relevant date.
- b) 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 i.e. 22<sup>nd</sup> November, 2022 till lock-in date. The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

Name of the Proposed Allottee	DP ID *	Quantity	Lock in Details	
			From	Till
Akshit Mahendra Raycha	1208500000005192	3,45,000	24/03/2022	24/03/2025
Ray Remedies Private Limited	1208500000005403	3,13,500	24/03/2022	24/03/2023
Sera Investments & Finance India Limited (Formerly known as Kapashi Commercial Limited)	1201980000399918	NIL	N.A.	N.A.
Everon Advisors Private Limited	IN30065210160269	NIL	N.A.	N.A.
Sweety Devesh Khandelwal	1204470003217491	NIL	N.A.	N.A.
Varun Falgunbhai Sheth	1201980000480952	NIL	N.A.	N.A.
Ravi Jayeshbhai Mashru	1201980000194289	NIL	N.A.	N.A.
TOTAL		6,58,500	-	-

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

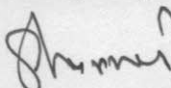
- c) None of the proposed allottees belonging to promoter(s) or the promoter group is ineligible for allotment in terms of Regulations 159 of SEBI (ICDR) Regulations, 2018.

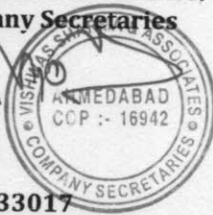
905, Sakar -V, B/h. Natraj Cinema, Ashram Road, Ahmedabad - 380009.  
(t/f) 079- 40053986 (m) 9722814909 (e) vishwas@csvishwas.com



- 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. 2022-23 is more than 5% of the post issue fully diluted share capital of the issuer.

**For Vishwas Sharma & Associates,  
Practising Company Secretaries**

  
**Vishwas Sharma  
Proprietor  
Membership No. 33017**



**Date: 21<sup>st</sup> November, 2022  
UDIN: A033017D001981117**