



Annexure IV

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

Dear Sir,

Sub: Application for "In-principal approval" prior to issue and allotment of 58,00,000 (Fifty-Eight Lakhs) equity shares on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

I, Mr. Kamlesh M. Shah, Practicing Company Secretary, Proprietor of Kamlesh M. Shah & Co. (Membership No. ACS: 8356, COP: 2072), 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) None of the allottees hold any equity shares of the issuer for a period starting from the relevant date till the date of preferential allotment except the following:

Name of the Proposed Allottee	Whether any Pre - preferential Holding held	Quantity
Akshit Mahendra Raycha	Yes	2,07,90,000
Mahendra C. Raycha HUF	Yes	1,83,82,770
Ray Remedies Private Limited	Yes	77,17,500
Zenith Lifecare Private Limited	Nil	Nil
Dhavalkumar Harshkantbhai Ruparelia	Nil	Nil
Mayankbhai Harshkantbhai Ruparelia	Nil	Nil
Strikar Lifescience LLP	Nil	Nil

- c) The pre-preferential shareholding of each of proposed allottee(s) (if any) 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. 15th November, 2023 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 *	Pre-preferential holding	Lock in Details		Pledged with	Pledge end date
			From	Till		
Akshit Mahendra Raycha	IN301645-0402063	2,07,90,000	20-01-26	31-10-26	-	-
Mahendra C. Raycha HUF	IN300982-10192570	1,83,82,770	20-01-26	31-10-26	-	-





KAMLESH M. SHAH & CO.
B.COM LLB ACS

Since - 1993
PEER REVIEWED

PRACTICING COMPANY SECRETARY

801-A, 8th Floor, Mahalay Complex, Opp. Choice Restaurant Lane, B/h. Fairdeal House,
Off. C. G. Road, Navrangpura, Ahmedabad - 380 009. M. : 09825097709 Phone : 079 - 40393858
E-mail : kshahcs@yahoo.co.in, cskshah@rediffmail.com

Ray Remedies Private Limited	IN300982-10192588	77,17,500	20-01-26	31-10-26	-	-
Zenith Lifecare Private Limited	IN300982-10786455	0	N.A.	N.A.	-	-
Dhavalkumar Harshkantbhai Ruparelia	IN300982-20030326	0	N.A.	N.A.	-	-
Mayankbhai Harshkantbhai Ruparelia	IN300982-20029766	0	N.A.	N.A.	-	-
Strikar Lifescience LLP	Applied	0	N.A.	N.A.	-	-
TOTAL	-	4,68,90,270	-	-	-	-

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

- 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. 2025-26 is less than 5% of the post issue fully diluted share capital of the issuer.

For, Kamlesh M. Shah & Co. ,
Practicing Company Secretaries

Mr. Kamlesh M. Shah,
Proprietor
Membership No. : ACS 8356



Date: 21st January, 2026
UDIN: A008356G003419896