

Date: 16.01.2024

The Board of Directors Akme Fintrade (India) Limited Akme Business Centre (ABC), 4-5 Subcity Centre Savin Circle, Opp. Krishi Upaz Mandi Udaipur - 313002

Sub: Proposed initial public offering of up to 1,10,00,000 Equity Shares of face value of ₹ 10 each ("Equity Shares") of Akme Fintrade (India) Limited ("the Company" or "the Issuer") for cash at a price of ₹ [•] per Equity Share (including a securities premium of ₹ [•] per Equity Share) ("Issue Price") aggregating up to ₹ [•] million (the "Issue").

The Company has requested us to certify whether all allotments whether all allotments of Equity Shares made by the Company till date are in compliance of the SEBI Circular dated December 31, 2015 bearing no. CIR/CFD/DIL3/18/2015 ("DPI Circular").

We have gone through the relevant statutory registers maintained as per the companies Act, Share Application forms, offer letters, bank statements of the Company proof of dispatch/delivery of letters, response of investors and other documents in relation to the allotments of equity shares made by the Company.

- (i) We state that the Company had made the allotments of Equity Shares on September 30, 2011, March 31, 2012, March 29, 2013, August 10, 2013 and March 31, 2014 where allottees exceeded 50 in number ("Stated Allotments") and further voluntarily provided exit offer.
- (ii) We certify that the below process was undertaken in accordance with the DPI Circular by the Company and is in compliance with the said circular.
  - i) The Company in its board meeting held on December 31, 2022, voluntarily provided an exit offer to eligible shareholders:

(a) who held equity shares allotted by the Company through the Stated Allotments and/or

- (b) who held Equity Shares of the Company which were acquired by them on account of transfers to them of the Equity Shares allotted through the Stated Allotments.
- ii) Subsequently, invitations were issued through offer letter to all the relevant eligible shareholders by way of registered post on January 03, 2023 to surrender the Equity Shares held by them on account of the Stated Allotments or by transfer of the Equity Shares issued under the Stated Allotments, at a purchase price calculated in accordance with the applicable SEBI circulars. M No. F

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iii) In accordance with items (i) (a) and (i) (b) above, the exit offer was made to a total of 13 Shareholders and no response/acceptance was received from such Shareholders. We confirm that the above process was undertaken in accordance with the DPI Circular by the Company and is in compliance with the same.

We further certify that none of the eligible shareholders has made any application to the Company for tendering their Equity Shares in the exit offer. We also submit that the Company has not received any complaints from its shareholders regarding the above-mentioned exit offer.

We further certify that for the purposes of the above confirmations, we have verified various documentary evidence including proof of dispatch/delivery of letters, response of investors, bank statements of the company.

All capitalised terms used but not defined in this letter shall have the meaning ascribed to such terms in the DRHP.

Yours faithfully

For Ronak Jhuthawat & Co

**Company Secretaries** 

Dr Ronak Jhuthawat

COP: 12094

Membership No.9738
Peer Review: 1270/2021
UDIN: F009738E003224873

Place: Udaipur