



**Ajay Shobha & Co.**  
Chartered Accountants

L - 2, Haridwar - 1,  
Evershine Nagar,  
Malad (W), Mumbai - 400064.  
Mobile: 99870 06258 / 9821056258  
Email: ajayshobha.co@gmail.com

## STATUTORY AUDITOR'S CERTIFICATE

To,  
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 29,000 Equity shares on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.**

We, Ajay Shobha & Co., Chartered Accountants, have verified the relevant records and documents of Saraswati Commercial (India) Limited (“the Company”) with respect to the proposed preferential issue by the Company as per Chapter V of Securities and Exchange Board of India (Issue of Capital And Disclosure Requirements) Regulations, 2018, as amended, (“SEBI (ICDR) Regulations, 2018”) and certify that:

- a) None of the proposed allottees have sold any equity shares of the Company during the six months period preceding 22<sup>nd</sup> March, 2021 (“The relevant date”). Further, where the proposed allottee(s) is/ are promoter/ promoter group entity(ies), then none of entities in the promoter and promoter group entities has/ have sold any equity share of the Company during the six-month period preceding the relevant date.
- b) The pre-preferential shareholding of each of proposed allottees has been locked in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018.





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The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

Name of the Proposed Allottees	DP ID	Quantity	Lock-in details	
			From	To
Winro Commercial (India) Limited	IN30154915835407	1,77,584	20 <sup>th</sup> March, 2021	23 <sup>rd</sup> November, 2021
Four Dimensions Commodities Private Limited	IN30115121624492	31,000	20 <sup>th</sup> March, 2021	23 <sup>rd</sup> November, 2021
Marco Private Limited	IN30115122373106	19,136	20 <sup>th</sup> March, 2021	23 <sup>rd</sup> November, 2021

- c) None of the proposed allottees belonging to promoters 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.

For Ajay Shobha & Co.  
Chartered Accountants  
Firm Reg. No.: 317031E

Ajay Gupta  
Partner

Membership No. 053071  
UDIN: 21053071AAAAFH9676



Date: 22<sup>nd</sup> March, 2021  
Place: Mumbai