

**B K Sharma and Associates**  
**Company Secretaries**

**CERTIFICATE FROM PRACTICING COMPANY SECRETARY ON THE COMPLIANCE WITH THE CONDITIONS OF PROPOSED PREFERENTIAL ISSUE BY SWARAJ SUITING LIMITED IN TERMS OF CHAPTER V OF THE SECURITIES EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018**

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To,  
The Board of Directors,  
**Swaraj Suiting Limited**  
F-483 to 487,  
RIICO Growth Center, Hamirgarh,  
Bhilwara-311001 (Rajasthan)

Respected Sir(s)/Madam(s),

1. This certificate is issued in accordance with the terms of our engagement with **Swaraj Suiting Limited** (hereinafter ‘**the Company**’).
2. In connection with the proposed issuance of 43,53,500 (Forty Three Lakh Fifty Three Thousand Five Hundred) Equity Shares (hereinafter ‘Proposed Preferential Issue’) of the Company to below mentioned Allottees (hereinafter ‘Proposed Allottees’), the Company is required to obtain a certificate from Practicing Company Secretary, with regard to compliance with the conditions of the proposed preferential issue, as per the requirements of Regulation 163 of Chapter V of the SEBI (Issue of Capital and Disclosure Requirements) regulations 2018, as amended (the “ICDR Regulations”).

S. No.	Name of Proposed Allottees
1.	ROHIT SHARMA
2.	SANTOSH VENKATESHWARAN IYER
3.	CHAMUNDESWARA NATH VANKINA
4.	ABHISHEK MOHAN NAYAR
5.	NAMBOORI THAKUR TILAK VERMA
6.	ROHIT NANDKISHORE LAMBA
7.	BHANUMATI PREMJI MIRANI
8.	SONIL SUREKA
9.	SUNIL AGRAWAL
10.	MEYURI HIREN SHETHIA
11.	ANIL KAMALKISHOR AGRAWAL

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12.	SHYAMSUNDAR KAMALKISHOR AGRAWAL
13.	PRAVIN RATANLALJI JAIN
14.	RISHABH PRAVIN JAIN
15.	NITYA ATUL AGRAWAL
16.	ICPA HEALTH PRODUCTS LTD
17.	ANISH RAMJI SHAH
18.	BHAVIKA DHIRAJLAL CHAVDA
19.	PATEL ANJANA KALPESHBBAI
20.	PATEL JAYSHREEBEN VINOD
21.	SWETA LATH
22.	MANJUDEVI AGRAWAL
23.	PARAG AGRAWAL
24.	SHUBHAM AGRAWAL
25.	ANIL G GUPTA HUF
26.	BHUSHAN RAVINDRASING PARDESHI
27.	NISHIT HARESH JASANI
28.	KRUTI NISHIT JASANI
29.	VASHIST R ANDHALE
30.	GABRIEL PET STRAPS LIMITED
31.	ASHISH SARAOGI
32.	PIYUSH PINJANI
33.	HIMANSHU AHUJA
34.	ANKIT PALIWAL
35.	AARTI GUPTA
36.	MARC KAY MATHENZ
37.	PRADEEP SEKHRI
38.	NIYATI JHAVERI
39.	AKSHAY KHANDOR
40.	VIJAY P SHAH HUF
41.	PAYAL RAHUL SAVLA
42.	HARILAL PREMJI SHAH
43.	SAURAV NAG
44.	ARFATALI MERCHANT
45.	DHWANI MERCHANT
46.	SHREE GURUKRUPA TRADELINK PRIVATE LIMITED
47.	NAVLEEN JUNEJA
48.	VINAY GARG

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49.	NAND NANDAN SUREKA
50.	DEEPAK BALDEVKUMAR AGGARWAL
51.	RAVI SHANKAR GUPTA
52.	BHUPENDRA JETHALAL MAMANIA
53.	MUKTA GUPTA
54.	AKSHAY RAJENDRA LALAN
55.	HARENDER RANA HUF
56.	SIDDHARTH SHARMA
57.	VINIT GUPTA HUF
58.	DEEPAK SINGHANIA
59.	MANJULA DINESH HINGER
60.	SHIV LAKHOTIA
61.	SHYAMSUNDER JAIGOPAL RATHI
62.	USTAB GANGULY
63.	BHARAT JAYANTILAL SHAH
64.	ANKIT KAMLESH SHAH
65.	RITESH AGARWAL
66.	VARUN SHRIKANT SADEKAR
67.	KIRTI AGGARWAL
68.	PRIYANKA TIWARI
69.	JYOTI SANJAY SANGHANI
70.	NIKUNJ CHAWLA
71.	SUNITA MITTAL
72.	MANOJKUMAR RAMCHAND GAGWANI
73.	RISHANK TIWARI
74.	PUSHPA MENON
75.	SHUBHATA DAKHATE
76.	NIKHIL GUPTA
77.	NIRAJ PRAFUL DHAROD
78.	MEGHNA BHAVESH MEHTA
79.	DEEPALI SACHIN AJMERA
80.	HARSHA JATIN DAISARIA
81.	RAHUL V PAREKH
82.	NITSON AGRO PRODUCTS PRIVATE LIMITED
83.	YASHEN JAYESH SAVLA
84.	MAHESH DALODRA
85.	SURESH SHANTILAL MEHTA

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86.	DHWANI ABHAY MEHTA
87.	DHIREN DILIPKUMAR MEHTA
88.	PARTH ASHISH MEHTA
89.	ANJANA RAJNIKANT PATEL
90.	RUPAL ATIK SANGHAVI
91.	SUMAIYA ZUBER KHAN
92.	NIRAJ PRAFULCHANDRA SHAH
93.	VAISHALI SAMIR MEHTA
94.	SAGAR SURESH KENIYA
95.	MARVI MANOJ JAIN
96.	KASHYAP POPAT HUF
97.	NEHA VAID
98.	MANSI JAIN
99.	HUKAMPRAKASH BAHADURCHAND BATRA
100.	SHIKHA NIRAJKUMAR BATRA
101.	VIRAJ Singh RAJENDRASINGH DOBHAL
102.	APURV NARENDRABHAI PANCHAMIA
103.	MONIKA JAIN
104.	BHAUMIK MAHENDRAKUMAR SHAH
105.	RAHUL R MAHAJAN
106.	HEMA BIMAL JOUKANI
107.	RUPESH SONI
108.	ROHIT BAJAJ
109.	SARIKA CHHATRALA
110.	KARISHMA JIGNESH DESAI
111.	SES ENTERPRISES
112.	LALIT PRATAP KAMBLE
113.	KARISHMA DHAMEJANI
114.	KAUSHIK GAJENDRARAY BUSA
115.	ASHA SURESH LALA
116.	SHRUTI RAHUL GHATALIA
117.	SHEETAL KRUNAL SHAH
118.	RAHUL RAMESH GHATALIA
119.	JATIN MANSI SHAH
120.	TAMANNA D MENDA
121.	AJAY CHITTAMURU REDDY
122.	BHOOMI SANCHETI

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123.	SHOBA LALITH
124.	VISHAL KUMAR PRASANLAL
125.	DEEPAK BETHALA
126.	VARUN V JAIN
127.	ANSHUL CHANDAK
128.	DARSHAN KUMAR
129.	NASRINBANU WADIWALA
130.	NILESH CHANDRAKANT SHETH
131.	PRATIK MAHENDRA MEHTA HUF
132.	MANDALI AKSHAYA SAI
133.	BHAVEN VASANJI GALA
134.	VIRAL SHAH
135.	KAMLESH VIRAJLAL SETH
136.	ANILKUMAR MAHENDRAKUMAR MORAKHIYA HUF
137.	SHASHI MISHRA
138.	BALA MANIKANDAN
139.	KISHOR LAXMICHAND DEDHIA
140.	RAHEE UMANG KENIA
141.	VISHAL NARENDRA GADA
142.	JEETAL VISHAL GADA
143.	HARSHA BHARAT CHHEDA
144.	KEWAL RASHMIN CHHEDA
145.	URVASHI NARENDRA GADA
146.	DHARMESH SUBHASH SALIA
147.	PRASHANT RATILAL NAGDA
148.	DHARA JIGNESH DHAROD
149.	KEYUR ASHVIN GALA
150.	RAJAN ASAN DARYANI
151.	RAKESHKUMAR NANJIBHAI PARMAR
152.	ASHOK SHIVRAJAPPA PANDHARE
153.	CHANDRAKANT VISHRAM SHIRODKAR
154.	BHOOMI SANJAY JAIN
155.	DISHA KUNHAL JAIN
156.	ISHITA MANOJ JAIN
157.	DHIREN MAHENDRA SHAH
158.	SAHIL NEMIN SAVADIA
159.	AMIT LAPASIA

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160.	SONAL SHAH
161.	NITYA GALA
162.	BELA SANJAY SHAH
163.	DELISHIYA NARESH CHHABRIA
164.	SRINIVAS MADHAVAN KONDRAMVALLAPIL
165.	ANSHUL GOYAL
166.	GAURAV JAIN
167.	PRAKASH KUMAR GOENKA
168.	PANKAJKUMAR JAYANTILAL PATEL
169.	CHHATRALA MEET SURESHBHAI
170.	ASHMEETA VIPULBHAI BHALODIYA
171.	JASMIN KUMAR PATEL
172.	PATEL KRUPALI PRABHAV
173.	YESHA PARIKH
174.	VIRAL BALVAHTRAY PANDYA
175.	MAYURI KISHORBHAI HADWANI
176.	SNEHA BHANDARI
177.	RUCHI MISTRY
178.	GANSHYAM DAS VAISHNAV
179.	VINAY AGGRAWAL
180.	JITENDRA MOHANLAL DUHLANI
181.	GAURAV JAIN HUF
182.	LAKHDATAR FINVEST
183.	VARTIKA DANGAYACH
184.	SUJATA SATISH SABNIS
185.	RAJ RANI
186.	KAMLABEN MANISHKUMAR VARDAY
187.	SWATI GUGLIA
188.	SANJAY KUMAR GAGRANI
189.	MANJU GUGLIYA
190.	S R TEXTILE & YARN SALES PRIVATE LIMITED
191.	PRINT GRAPHICS & DESIGNS PRIVATE LIMITED
192.	SURYA COTEX PRIVATE LIMITED
193.	MOHAMMED BOHRA
194.	SABIHA BEE
195.	GYAN CHAND KANTHED

196.	SURUCHI JAIN
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### **Management's Responsibility**

3. The compliance with Chapter V of the ICDR Regulations for the preferential issue and allotment of equity shares is the responsibility of the management of the Company. Management is also responsible for preparation and maintenance of all accounting and other relevant support records and documents. This responsibility includes the design, implementation and maintenance of internal controls relevant to the preparation of internal controls relevant to the preparation/ presentation of the Notice and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.
4. The Management is also responsible for providing all relevant information to the SEBI, and/or National Stock Exchange of India Ltd.
5. The Management is also responsible for ensuring that the Company complies with the below requirements of the ICDR Regulations:
  - i. Determine the relevant date, being the date thirty days prior to the date on which the meeting of shareholders is held to consider the proposed preferential issue;
  - ii. Determine the minimum price of the equity shares in accordance with Regulation 164 of the ICDR Regulations.
  - iii. Compliance with the all other requirements of the ICDR Regulations.

### **Certifier's Responsibility**

6. Pursuant to the requirements of sub-regulation (2) of Regulation 163 of Part III of Chapter V of the ICDR Regulations, it is our responsibility to obtain limited assurance and conclude as to whether the details of the Proposed Preferential Issue is in accordance with the requirements of the ICDR Regulations as applicable to the preferential issue.
7. We conducted our examination of the statement/ records in accordance with the applicable guidance issued by the Institute of Company Secretaries of India (the "ICSI"). The guidance requires that we comply with the ethical requirements of the Code of Conduct issued by ICSI.
8. A limited assurance engagement includes performing procedures to obtain sufficient appropriate evidence that vary in nature, timing and extent than a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had

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we performed a reasonable assurance engagement. Accordingly, we have performed the following procedures in relation to the engagement:

- a) With respect to conditions specified in Regulation 159 & 160 of the ICDR Regulations, we have performed the following procedures to confirm the compliance with required conditions:
  - i. Noted the relevant date i.e. the 24<sup>th</sup> November 2025, being the date thirty days prior to the date on which the resolution shall be deemed to be passed, i.e. the 24<sup>th</sup> December 2025, which is the date on which the meeting of shareholders is to be held to consider the proposed preferential issue as specified in the Notice for Extra Ordinary General Meeting ('EGM');
  - ii. Verified that the Company has obtained requisite undertaking and/or DP Transaction Statement from the Proposed Allottees to ensure that they have not sold or transferred any equity shares of the Company from the relevant date up to a period of 90 trading days from the date of allotment of such securities;
  - iii. Verified from the undertaking and DP statement obtained by the Company from Proposed Allottees, the 'pre-preferential holding' of equity shares of the Company held by the proposed allottees, is held in the dematerialized form;
  - iv. Verified that the Company has obtained Permanent Account Number (PAN) of the Proposed Allottees; and
- b) Read the Notice of EGM and verified that Special Resolution for Proposed Preferential Issue of Equity Shares of the Company is included in the same and the requisite disclosures in the Notice have been made in accordance with Regulation 163(1) of the SEBI (ICDR) Regulations and other applicable laws and regulations;
- c) With respect to compliance with minimum price for proposed issue which is in accordance with applicable provisions of the SEBI (ICDR) Regulations, and recomputed the arithmetical accuracy of calculation of the minimum price of the proposed issue;
- d) Read the certified copy of the resolution passed at the Board meeting held on the 25<sup>th</sup> November 2025 produced before us by the management containing the list of the Proposed Allottees;
- e) Conducted relevant management inquiries and obtained necessary representations.

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**Conclusion**

9. Based on our examination as above, and the information and explanations given to us, nothing has come to our attention that causes us to believe that the details of the proposed issue provided is not in accordance with the requirements of the ICDR Regulations as applicable to the preferential issue, except that the special resolution required for approval of shareholders for proposed preferential issue is yet to be passed as required by the ICDR Regulations.

**Restriction on distribution or use**

10. Our work was performed solely to assist you in meeting your responsibilities in relation to your compliance with the ICDR Regulations and this certificate is addressed to and provided to the Board of Directors of the Company solely with the purpose of placing before shareholders of the Company (on the website of the Company) so as to provide them requisite information for approving the proposed preferential issue of equity shares and for the purpose of further submission to the stock exchange(s) and should not be used by any other person or for any other purpose.
11. Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this certificate is shown or into whose hands it may come without our prior consent in writing. Also, we neither accept nor assume any duty or liability for any other purpose or to any other party to whom our certificate is shown or into whose hands it may come without our prior written consent.

**For BK SHARMA & ASSOCIATES**  
Company Secretaries

(Brij Kishore Sharma)  
Proprietor  
M. No. FCS-6206; CP No.: 12636  
Peer Review Certificate No. 6711/2025  
**UDIN: F006206G002457622**

Firm Code: S2013RJ233500  
Date: 15-12-2025  
Place: Jaipur