



ARMS & ASSOCIATES LLP
Practicing Company Secretaries
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To
Srujan Alpha Capital Advisors LLP
824 & 825, Corporate Avenue
Sonawala Road, Opposite Atlanta Centre
Sonwala Industry Estate, Goregaon, Mumbai
Maharashtra – 400 064

Sub: Certificate from Practicing Company Secretary as an “Expert” relating to compliance of provision of Section 67 of Companies Act, 1956

I, Sandeep Kumar Jain, Designated Partner of *Arms and Associates LLP*, Company Secretaries, have been appointed by Shri Ahimsa Naturals Limited (hereinafter referred to as ‘Company’), having CIN: U14101RJ1990PLC005641 and having its Registered Office at E-94, RIICO Industrial Area Bagru Ext., Bagru, Jaipur-303007 to issue this certificate.

It has been informed that company has done the following allotment of shares

Date of Allotment	No. of Equity Shares	Face value (₹)	Issue Price (₹)	Nature of consideration	Nature of Allotment	Number of Allottees
10th July, 1995	7,81,000	10	10	Cash	Preferential Allotment	255

Query by Company

In the abovementioned Preferential allotment we seek your legal opinion keeping in view of the compliance of Section 67 of erstwhile Companies Act, 1956.

Documents Shared

1. Form 2 return with List of allottees
2. Resolutions passed by the Company
3. Offer Letter sent to applicants

Our Opinion on the Query

On the basis of the relevant management inquiries, necessary representations and information received from the management of the Company, I have verified that the subject preferential issue is being made in accordance with the applicable requirements of the Section 67 of the Companies Act 1956 as reproduced below.



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Section 67 - Construction of references to offering shares or debentures to the public, etc.

(1) Any reference in this Act or in the articles of a company to offering shares or debentures to the public shall, subject to any provision to the contrary contained in this Act and subject also to the provisions of sub-sections (3) and (4), be construed as including a reference to offering them to any section of the public, whether selected as members or debenture holders of the company concerned or as clients of the person issuing the prospectus or in any other manner.

(2) Any reference in this Act or in the articles of a company to invitations to the public to subscribe for shares or debentures shall, subject as aforesaid, be construed as including a reference to invitations to subscribe for them extended to any section of the public, whether selected as members or debenture holders of the company concerned or as clients of the person issuing the prospectus or in any other manner.

(3) No offer or invitation shall be treated as made to the public by virtue of sub-section (1) or sub-section (2), as the case may be, if the offer or invitation can properly be regarded, in all circumstances

- a) as not being calculated to result, directly or indirectly, in the shares or debentures becoming available for subscription or purchase by persons other than those receiving the offer or invitation ; or
- b) otherwise as being a domestic concern of the persons making and receiving the offer or invitation.

(4) Without prejudice to the generality of sub-section (3), a provision in a company's articles prohibiting invitations to the public to subscribe for shares or debentures, shall not be taken as prohibiting the making to members or debenture holders of an invitation which can properly be regarded in the manner set forth in that sub-section.

(5) The provisions of this Act relating to private companies shall be construed in accordance with the provisions contained in sub-sections (1) to (4).

Date:16/08/2024
Place: Jaipur

UDIN: F005398F000986631

For ARMS & Associates LLP
Company Secretaries
ICSI URN: P2011RJ023700
PR 818/2020

Sandeep Kumar Jain
Designated Partner
FCS 5398 CP No.4151