



**Annexure IV**

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 2,93,569 Equity Shares on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.**

We, **Dinesh Birla & Associates, Practicing Company Secretary**, have verified the relevant records and documents of **Kinetic Engineering Limited** with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

- a) The proposed allottee has not sold any equity shares of the company during the 90 trading days preceding the relevant date i.e. 10<sup>th</sup> May 2022. Further, none of the 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 i.e. 10<sup>th</sup> May, 2022.
- b) The pre-preferential shareholding of the proposed allottee has been locked in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018. Further, there is no sale/ pledge of pre-preferential holding from the relevant date i.e. 10<sup>th</sup> May, 2022 till (date of lock-in) i.e. 10<sup>th</sup> May, 2022. The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

| Name of the Proposed Allottee | DP ID *  | Shareholding as on Relevant Date | Qty. locked-in | Lock-in details |            |
|-------------------------------|----------|----------------------------------|----------------|-----------------|------------|
|                               |          |                                  |                | From            | To         |
| Mr. Ajinkya Arun Firodia      | IN300888 | 21,24,055                        | 11,29,055      | 12/02/2021      | 15/09/2022 |
|                               |          |                                  | 9,95,000       | 08/03/2022      | 20/03/2025 |

- c) 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.



**DINESH BIRLA & ASSOCIATES**  
**COMPANY SECRETARIES**

B-201, MSR Queenstown, Near Lokmanya  
Hospital, behind Chinchwad Railway Station,  
UdyogNagar, Chinchwad, Pune - 411033.  
Mob. No. 9766693603  
Email : [csdineshbirla@gmail.com](mailto:csdineshbirla@gmail.com)

- 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.
- e) 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.”
- f) The total allotment to the allottee in the present preferential issue or in the same financial year i.e. 2022-23 is less than 5% of the post issue fully diluted share capital of the issuer.

**For Dinesh Birla & Associates**  
**Company Secretaries**

**Dinesh Birla,**  
**Proprietor**  
**Membership No.: F7658**  
**COP No. : 13029**

**Date: 17<sup>th</sup> May, 2022**