



PRACHI BANSAL AND ASSOCIATES
COMPANY SECRETARIES
Address- House no 837Sector 28
Faridabad,121008
Phone no-9899563128
Mail id-Prachi.jain2805@gmail.com

The Chief General Manager

Listing Operation,

BSE Limited,

20th Floor, P. J. Towers,

Dalal Street,

Mumbai – 400001

Dear Sir,

Sub: Application for “In-principle approval” prior to issue and allotment of 46,25,062 Equity Shares on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

I, Prachi Bansal (Practicing Company Secretary) has verified the relevant records and documents of North Eastern Carrying Corporation Limited (the Company) with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

- a) None of the proposed allottees have sold any equity shares of the company during the 90 trading days preceding the relevant date. Further, none of entities in the promoter has sold any equity share of the company during the 90 trading days preceding the relevant date.
- b) Sunil Kumar Jain (Promoter) and Hemant Kumar Aggarwal (Others) are not holding any equity shares in the company and therefore the requirement of lock-in of pre-preferential shareholding is not applicable.

- c) The pre-preferential shareholding of each of proposed allottee(s) has been locked in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018. Further, there is no sale/ pledge of pre-preferential holding from (Relevant Date) till (date of lock-in). The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder: **NOT APPLICABLE**

Name of Proposed Allottee	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		

(*) client id/ folio no in case allottee hold the securities in physical form

- d) None of the proposed allottee belonging to promoter or promoter group is ineligible for allotment in terms of Regulations 159 of SEBI (ICDR) Regulations, 2018.
- e) 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.
- f) 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.”

- g) The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e. 2023-24 is less than 5% of the post issue fully diluted share capital of the issuer.

**For PRACHI BANSAL & ASSOCIATES
(Company Secretaries)**



PRACHI

CS Prachi Bansal

Proprietor

Membership No: 43355

UDIN: A043355E003438758

Place: Faridabad

Date: 15.02.2024