

**THIS IS A PUBLIC ANNOUNCEMENT FOR INFORMATION PURPOSES ONLY. THIS IS NOT A PROSPECTUS ANNOUNCEMENT AND DOES NOT CONSTITUTE AN INVITATION OR OFFER TO ACQUIRE, PURCHASE OR SUBSCRIBE FOR UNITS OR SECURITIES. NOT FOR RELEASE, PUBLICATION OR DISTRIBUTION, DIRECTLY OR INDIRECTLY OUTSIDE INDIA.**



(Please Scan this QR Code to view Addendum to DRPH)



**SHRI AHIMSA NATURALS LIMITED**

(Formerly known as Shri Ahimsa Mines and Minerals Limited)

Our Company, Shri Ahimsa Naturals Limited (“Company” or “Offer”) was originally incorporated in the name and style of ‘Ahimsa Mines and Minerals Private Limited’ under the Companies Act, 1956 with the Registrar of Companies, Jaipur, on October 17, 1990. Further, the name of our Company was changed to ‘Shri Ahimsa Mines and Minerals Private Limited’, and a fresh certificate of incorporation dated July 14, 1992 was issued by the RoC, Jaipur. Subsequently, the constitution of Company was changed from a Private Limited Company to a Public Limited Company and consequently the name of our Company was changed to ‘Shri Ahimsa Mines and Minerals Limited’, and a fresh certificate of incorporation dated August 19, 1992 was issued by the RoC, Jaipur. The name of our Company was further changed to ‘Shri Ahimsa Naturals Limited’, and a fresh certificate of incorporation dated April 25, 2023 was issued by the RoC, Jaipur. For details in relation to changes in Registered Office of our Company please refer to chapter titled “*History and Corporate Structure*” beginning on page no. 160 of this Draft Red Herring Prospectus.

**Registered Office:** E-94, RIICO Industrial Area, Bagru, Ext. Bagru-303007, Jaipur, Rajasthan, India  
**Contact Person:** Ms. Aayushi Jain Company Secretary and Compliance Officer; **Tel:** + 0141-2202482; **Fax:** + 0141-2203623  
**E-mail:** [info@shriahimsa.com](mailto:info@shriahimsa.com) **Website:** <https://www.naturalcaffeine.co.in/>  
**CIN:** U14101RJ1990PLC005641

NOTICE TO INVESTORS: ADDENDUM TO THE DRAFT RED HERRING PROSPECTUS DATED SEPTEMBER 06, 2024 (THE “ADDENDUM ”)	
<p>INITIAL PUBLIC OFFER UP TO 62,04,000<sup>*</sup> EQUITY SHARES OF FACE VALUE OF ₹ 10/- EACH (“EQUITY SHARES”) OF SHRI AHIMSA NATURALS LIMITED (THE “COMPANY” OR “ISSUER”) FOR CASH AT AN OFFER PRICE OF ₹ [●] PER EQUITY SHARE (INCLUDING A SHARE PREMIUM OF ₹ [●] PER EQUITY SHARE) (“OFFER PRICE”), AGGREGATING UP TO ₹ [●] LAKHS (“THE OFFER”) COMPRISING A FRESH ISSUE UP TO 42,04,000 EQUITY SHARES AGGREGATING UP TO ₹ [●] LAKH (THE “FRESH ISSUE”) AND AN OFFER FOR SALE UP TO 20,00,000 EQUITY SHARES BY MR. NEMI CHAND JAIN AND MRS. SUMITRA JAIN; (“THE PROMOTER SELLING SHAREHOLDERS”) AGGREGATING UP TO [●] EQUITY SHARES AGGREGATING UP TO ₹ [●] LAKHS (“OFFER FOR SALE”) OUT OF WHICH [●] EQUITY SHARES OF FACE VALUE OF ₹ 10/- EACH, AT AN OFFER PRICE OF ₹ [●] PER EQUITY SHARE FOR CASH, AGGREGATING ₹ [●] LAKHS WILL BE RESERVED FOR SUBSCRIPTION BY THE MARKET MAKER TO THE OFFER (THE “MARKET MAKER RESERVATION PORTION”). THE PUBLIC OFFER LESS MARKET MAKER RESERVATION PORTION I.E. OFFER OF [●] EQUITY SHARES OF FACE VALUE OF ₹ 10/- EACH, AT AN OFFER PRICE OF ₹ [●] PER EQUITY SHARE FOR CASH, AGGREGATING UP TO ₹ [●] LAKHS IS HERINAFTER REFERRED TO AS THE “NET OFFER”. THE OFFER AND NET OFFER WILL CONSTITUTE [●] % AND [●] % RESPECTIVELY OF THE POST-OFFER PAID-UP EQUITY SHARE CAPITAL OF OUR COMPANY.</p> <p>THE PRICE BAND AND THE MINIMUM BID LOT WILL BE DECIDED BY OUR COMPANY AND THE PROMOTER SELLING SHAREHOLDERS IN CONSULTATION WITH THE BRLM AND WILL BE ADVERTISED IN [●] EDITION OF [●] (A WIDELY CIRCULATED ENGLISH NATIONAL DAILY NEWSPAPER), [●] EDITION OF [●] (A WIDELY CIRCULATED HINDI NATIONAL DAILY NEWSPAPER, AND [●] EDITION OF [●], (A WIDELY CIRCULATED HINDI DAILY NEWSPAPER, HINDI BEING THE REGIONAL LANGUAGE OF RAJASTHAN WHERE OUR REGISTERED OFFICE IS LOCATED), AT LEAST TWO WORKING DAYS PRIOR TO THE BID/OFFER OPENING DATE AND SHALL BE MADE AVAILABLE TO THE NATIONAL STOCK EXCHANGE OF INDIA LIMITED (“NSE”) FOR THE PURPOSES OF UPLOADING ON THEIR WEBSITE.</p> <p>FOR FURTHER DETAILS KINDLY REFER TO CHAPTER TITLED “TERMS OF THE OFFER” BEGINNING ON PAGE 263 OF THIS DRAFT RED HERRING PROSPECTUS</p>	
<p>Potential Applicants may note the following:</p> <p>The Draft Red Herring Prospectus including the sections titled “<i>Summary of the Offer Document</i>”, “<i>Risk Factors</i>”, “<i>General Information</i>”, “<i>Capital Structure</i>”, “<i>Objects of the Offer</i>”, “<i>Our Business</i>”, “<i>Key Regulations and Policies in India</i>”, “<i>Our Management</i>”, “<i>Our Promoter &amp; Promoter Group</i>”, “<i>Restated Financial Information</i>”, “<i>Management’s Discussion and Analysis of Financial Condition and Results of Operation</i>”, “<i>Government and Other Approvals</i>” and “<i>Other Regulatory and Statutory Disclosures</i>” beginning on pages 18, 26, 56, 66, 95, 135, 153, 164, 182, 192, 228, 248 and 254 respectively of the Draft Red Herring Prospectus dated September 06, 2024 shall be appropriately updated to reflect the developments indicated in this Addendum, as and when they are filed with the RoC and the Stock Exchange.</p> <p>The changes in this Addendum are to be read in conjunction with the Draft red herring Prospectus and accordingly the corresponding references in the Draft red herring Prospectus stand updated pursuant to this Addendum. The information in this Addendum supplements the Draft red herring Prospectus and updates the information in the Draft red herring Prospectus, as applicable. However, this Addendum does not reflect all the changes that have occurred between the date of filing of the Draft red herring Prospectus and the date hereof, and accordingly does not include all the changes and/or updates that will be included in the Draft Red Herring Prospectus. Please note that the information included in the Draft red herring Prospectus will be suitably updated, including to the extent stated in this Addendum, as may be applicable, in the Draft Red herring Prospectus, as and when filed with the RoC and the Stock Exchanges. Investors should not rely on the Draft red herring Prospectus or this Addendum for any investment decision, and should read the Prospectus, as and when it is filed with the RoC and the Stock Exchanges before making an investment decision with respect to the Offer. All capitalized terms used in this Addendum shall, unless the context otherwise requires, have the meaning ascribed to them in the Draft Red Herring Prospectus.</p>	
BOOK RUNNING LEAD MANAGER	REGISTRAR TO THE OFFER
 <p><b>Srujan Alpha Capital Advisors LLP</b>  <b>Registered Address:</b> 112A, 1st floor, Arun Bazar, S.V. Road, Beside Bank of India, Malad (West), Mumbai - 400 064  <b>Corporate Office:</b> 824 &amp; 825, Corporate Avenue Sonawala Rd, opposite Atlanta Centre, Sonawala Industry Estate Goregaon, Mumbai – 400 064  <b>Telephone:</b> +91 022- 4603 0709 <b>Contact Person:</b> Jinesh Doshi  <b>E-mail:</b> <a href="mailto:jinesh@srujanalpha.com">jinesh@srujanalpha.com</a>  <b>Website:</b> <a href="http://www.srujanalpha.com">www.srujanalpha.com</a>  <b>Investor Grievance E-mail:</b> <a href="mailto:partners@srujanalpha.com">partners@srujanalpha.com</a> , <a href="mailto:jinesh@srujanalpha.com">jinesh@srujanalpha.com</a>  <b>SEBI Registration No.:</b> INM000012829</p>	 <p><b>Cameo Corporate Services Limited</b>  <b>Registered Address:</b> "Subramanian Building", #1, Club House Road, Chennai - 600 002  <b>Telephone:</b> +91-44-40020700, 28460390 <b>Fax:</b> +91-44-28460129  <b>Contact Person:</b> Ms. K Sreepriya  <b>Email:</b> <a href="mailto:ipo@cameoindia.com">ipo@cameoindia.com</a>  <b>Website:</b> <a href="http://www.cameoindia.com">www.cameoindia.com</a>  <b>CIN:</b> U67120TN1998PLC041613  <b>Investor Grievance Email:</b> <a href="mailto:ipo@cameoindia.com">ipo@cameoindia.com</a>  <b>SEBI Registration Number:</b> INR000003753</p>

## TABLE OF CONTENTS

<b>PARTICULARS</b>	<b>PAGE NO.</b>
<b>SECTION I – GENERAL</b>	
<a href="#">SUMMARY OF THE OFFER DOCUMENT</a>	1
<b>SECTION II – RISK FACTORS</b>	2
<b>SECTION III – INTRODUCTION</b>	
<a href="#">GENERAL INFORMATION</a>	25
<a href="#">CAPITAL STRUCTURE</a>	26
<a href="#">OBJECTS OF THE OFFER</a>	31
<b>SECTION – IV ABOUT OUR COMPANY</b>	
<a href="#">OUR BUSINESS</a>	36
<a href="#">KEY REGULATIONS AND POLICIES IN INDIA</a>	42
<a href="#">OUR MANAGEMENT</a>	43
<a href="#">OUR PROMOTERS AND PROMOTER GROUP</a>	45
<b>SECTION V – FINANCIAL INFORMATION</b>	
<a href="#">RESTATED FINANCIAL INFORMATION</a>	48
<a href="#">MANAGEMENT’S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATION</a>	50
<b>SECTION VI – LEGAL AND OTHER INFORMATION</b>	
<a href="#">GOVERNMENT AND OTHER APPROVALS</a>	53
<a href="#">OTHER REGULATORY AND STATUTORY DISCLOSURES</a>	55
<b>SECTION IX – OTHER INFORMATION</b>	
<a href="#">DECLARATION</a>	56

## SUMMARY OF THE OFFER DOCUMENT

- I. Under the heading “Aggregate Pre-Offer and and Post-Offer Shareholding of our Promoters, Promoter Group and Promoter Selling Shareholders” in the chapter “SUMMARY OF THE OFFER DOCUMENT” beginning on page 18 of the Draft red herring Prospectus shall be updated to reflect as under.

### Aggregate Pre-Offer and and Post-Offer Shareholding of our Promoters, Promoter Group and Promoter Selling Shareholders

The aggregate pre-Offer shareholding of our Promoters, Promoter Group and Promoter Selling Shareholders as a percentage of the pre-issue paid-up equity share capital of our Company is set out below:

Sr. No.	Name of the Shareholder	Pre-Offer Equity Share capital		Post-Offer Equity Share capital	
		No. of Equity Shares	% of paid-up Equity Share Capital*	No. of Equity Shares	% of paid-up Equity Share Capital*
<b>Promoter Selling Shareholders</b>					
1.	Mr. Nemi Chand Jain	74,05,300	38.72	[●]	[●]
2.	Mrs. Sumitra Jain	26,04,000	13.61	[●]	[●]
<b>Sub-total (A)</b>		<b>1,00,09,300</b>	<b>52.33</b>	[●]	[●]
<b>Promoters</b>					
1.	Mr. Amit Kumar Jain	39,02,500	20.40	[●]	[●]
2.	Mr. Sumit Jain	4,37,500	2.29	[●]	[●]
3.	Mrs. Prerna Jain	5,68,750	2.97	[●]	[●]
4.	M/s Ahimsa Holdings Private Limited	15,47,000	8.09	[●]	[●]
5.	M/s Bimneer Investments Private Limited	12,26,750	6.41	[●]	[●]
<b>Sub-total (B)</b>		<b>76,82,500</b>	<b>40.16</b>	[●]	[●]
<b>Promoter Group</b>					
1.	Mr. Deepak Sogani	3,30,750	1.73	[●]	[●]
<b>Sub-total (C)</b>		<b>3,30,750</b>	<b>1.73</b>	[●]	[●]
<b>Total (A + B + C)</b>		<b>1,80,22,550</b>	<b>94.22</b>	[●]	[●]

\*Rounded off to the closest decimal

## SECTION II: RISK FACTORS

The Section “*Internal Risk factors*” in the chapter “RISK FACTORS” beginning on page 26 of the Draft Red Herring Prospectus shall be updated to reflect as under.

### INTERNAL RISK FACTORS

**1. *Some of the immediate relatives of our Promoters, who are deemed to be a part of the Promoter Group under SEBI ICDR Regulations have not provided consent and / or any confirmations, undertakings for them to be included as a members of the Promoter Group***

Our Company had sought and requested, (i) Pradip Jain, Prakash Chand Mul Chand Jain, Bimal Jain, Anil Kumar Jain, Rajesh Kumar Jain , Deepak Jain, Ajit Kumar Jain (Brothers of Mr. Nemi Chand Jain & Spouse’s Brother of Mrs. Sumitra Jain) (ii) Sulochana Devi Jain, Sushila Devi Jain, Sarita Devi Jain, Babita Jain (Sisters of Mr. Nemi Chand Jain & Spouse’s Sister of Mrs. Sumitra Jain) (iii) Suresh Kumar Patni, Sunil Kumar Patni, Anil Kumar Patni, Lalit Kumar Patni (Brothers of Mrs. Sumitra Jain and Spouse’s Brother of Mr. Nemi Chand Jain) (iv) Neha Jain (Sister of Mrs. Sumitra Jain & Spouse’s Sister of Mr. Nemi Chand Jain) (collectively called “Immediate Relatives”), deemed to be a part of the Promoter Group under the SEBI ICDR Regulations to provide the consents and / or confirmations, undertakings for them to be included as a members of the Promoter Group of our Company as well as any other entities/bodies corporate/firms/HUFs that they may be interested which would qualify as part of the Promoter Group of the Company under the SEBI ICDR Regulations.

Our Company had filed an exemption application dated February 26, 2024 (“Exemption Application”) under Regulation 300(1)(c) of the SEBI ICDR Regulations with SEBI seeking an exemption from considering and disclosing (i) Pradip Jain, Prakash Chand Mul Chand Jain, Bimal Jain, Anil Kumar Jain, Rajesh Kumar Jain , Deepak Jain, Ajit Kumar Jain (Brothers of Mr. Nemi Chand Jain & Spouse’s Brother of MRS. Sumitra Jain) (ii) Sulochana Devi Jain, Sushila Devi Jain, Sarita Devi Jain, Babita Jain (Sisters of Mr. Nemi Chand Jain & Spouse’s Sister of MRS. Sumitra Jain) (iii) Suresh Kumar Patni, Sunil Kumar Patni, Anil Kumar Patni, Lalit Kumar Patni (Brothers of Mrs. Sumitra Jain and Spouse’s Brother of Mr. Nemi Chand Jain) (iv) Neha Jain (Sister of Mrs. Sumitra Jain & Spouse’s Sister of Mr. Nemi Chand Jain) (v) any body corporate in which in which 20% or more of the equity share capital is held by the above mentioned individuals or a firm or any Hindu Undivided Family where any of such individuals may be a member or (vi) any body corporate in which the body corporate mentioned under (vi) above holds 20% or more of the equity share capital or (vii) any Hindu undivided family or firm in which may hold 20% or more of the total capital in accordance with the SEBI ICDR Regulations (collectively called “Dissenting members”) part of Promoter Group based on Affidavits provided by Dissenting members stating that they do not want to be considered as part of Promoter Group.

In view of the non-receipt of the approval of Exemption Application from SEBI and in order to comply with the disclosure requirements specified under SEBI ICDR Regulations pertaining to members of the Promoter Group of the issuer company, our Company has disclosed such details pertaining to Dissenting members in the section titled “Our Promoter and Promoter Group” to the best of our Company’s knowledge and to the extent the information was available with the Company and accessible in the public domain including identified body corporates in which 20% or more of the shareholding is held by dissenting members as available & published on the websites of (i) Watchout Investors (accessible at <https://www.watchoutinvestor.com/>); (ii) CIBIL (accessible at <https://suit.cibil.com/>), (iii) BSE Limited (list of debarred entities accessible at <https://www.bseindia.com/investors/debent.aspx>); and (iv) National Stock Exchange of India Limited (accessible at <https://www.nseindia.com/regulations/member-sebi-debarred-entities>), (v) ROC Search on Ministry of Corporate Affairs’ (MCA) website (accessible at <https://www.mca.gov.in/>) on a ‘name search’ basis of Dissenting Members, to identify any adverse findings linked to the Dissenting members and identified body corporates.

However, we do not possess any documents, including but not limited to consent letters from Dissenting Members related to them and their identified body corporates to confirm whether the results found on the Watchout Investors and CIBIL websites, debarred list belonging specifically to them. Consequently, while the Company has made reasonable efforts to verify and include this information to the best of its knowledge, and has been able to obtain confirmation of the limited search results. Due to this limitation, there is a risk that the available information may not be exhaustive or fully conclusive.

**2. *Our Statutory Auditors have included certain qualifications in the annexure to their audit reports, for the years ended March 31, 2024, March 31, 2023 and March 31, 2022.***

Our Statutory Auditors have included the following qualifications in the annexure to their audit reports for the year ended March 31, 2024, March 31, 2023 and March 31, 2022:

For the financial year ended March 31, 2024:

- i. We draw your attention to Note No. 37 of the consolidated financial statements regarding purchases of agricultural land and payment of advance of ₹21 Lakhs for such purchase, as more fully described in the said Note. We are unable to make any further comments in this regard in absence of agreement/ Conveyance Deed in favour of the Company.
- ii. We draw your attention to Note No. 38 of the consolidated financial statements regarding accounting for Insurance Claim ₹58.49 Lakhs which is yet to be approved as more described in the said Note. We are unable to make any further comment in this regard in absence of approval of claim by the respective insurance company.

For the financial year ended March 31, 2023:

- i. We draw your attention to Note No. 37 of the consolidated financial statements regarding purchases of agricultural land and payment of advance of ₹21 Lakhs for such purchase, as more fully described in the said Note. We are unable to make any further comments in this regard in absence of agreement/ Conveyance Deed in favour of the Company.

For the financial year ended March 31, 2022:

- i. We draw attention to Note No. 34 of the financial statements regarding non-provision of doubtful debts and advances amounting to ₹23.71 lakhs. We further report that, had this observation made by us herein above been considered, the Profit for the year would have been lower by ₹23.71 lakhs, Reserves and Surplus would have been ₹2178.89 Lakhs instead of ₹2202.60 lakhs, Trade Receivables would have been ₹370.35 Lakhs instead of ₹392.06 Lakhs and Long-Term Loans and Advances would have been ₹38.17 Lakhs instead of ₹40.17 lakhs. This matter was also qualified in our report on the financial statements for earlier years.

Now the provision for doubtful debts and advances of ₹23.71 Lakhs was made in year ended 31st March, 2022 in the Restated Financial Statements. Therefore, the impact of the above qualification has been considered in Restated Financial Statements.”

For further information, see “**Management’s Discussion and Analysis on the Financial Conditions and Results of Operations - Auditor Observations/ Remarks**” on page no 228 and “**Restated Financial Information**” on page no 192. There can be no assurance that any similar remarks or matters of emphasis/key audit matters will not form part of our financial statements for the future fiscal periods, which could subject us to additional liabilities due to which our reputation and financial condition may be adversely affected.

3. **The Primary Object to issue is Investment in Wholly Owned Subsidiary which is setting up a manufacturing unit (“Proposed Project”). Such Proposed Project is subject to the risk of unanticipated delays in implementation, cost overruns and certain Government approvals and licenses. If we are unable to implement the expansion plans at the planned cost or time or unable to obtain Government approvals and licenses, it could materially and adversely impact our business, results of operations and financial condition.**

We have made and intend to continue making investments to better serve our existing customers, and better economies of scale. We intend to deploy majority of the net proceeds from the Issue to set up a new unit for manufacturing Caffeine Anhydrous Natural, Green Coffee Bean Extract and Crude Caffeine (“**Proposed Project**”) at Khasra No. 3699 to 3703 & 4172/3683, Village Sawarda, Tehsil Mozamabad, District Jaipur, Rajasthan. For further details, see “**Objects of the Issue**” on page no. 95.

The Proposed Project may be subject to the potential uncertainties that setting up of a projects may face including cost overruns or delays, delay in receipt of Government approvals and licenses as we apply for them at various stages of the project, inadequate performance of the equipment and machinery installed, delays in completion, defects in design or construction, the possibility of unanticipated future regulatory restrictions, labour shortages, incremental pre-operating expenses, unforeseen taxes and duties, interest and finance charges and other external factors which may not be within the control of our management.

There can be no assurance that it will be completed as planned or on schedule, and if they are not completed in a timely manner, or at all, our budgeted costs may be insufficient to meet our proposed capital expenditure requirements. If our actual capital expenditures significantly exceed our budgets, or even if our budgets were sufficient to cover these projects, we may not be able to achieve the intended economic benefits of this Proposed Project, which in turn may materially and adversely affect our financial condition, results of operations, cash flows, and prospects.

There can be no assurance that we will be able to complete the expansion in accordance with the proposed schedule of implementation and any delay could have an adverse impact on our business, results of operations and financial condition.

**4. Our Company plans to invest an estimated sum of ₹3,500 lakhs out of the Net proceeds of the Issue in our Wholly Owned Subsidiary namely “Shri Ahimsa Healthcare Private Limited” for setting up a manufacturing unit (“Proposed Project”). In the event of any delay in placing these orders, or if the vendors are not able to provide the equipment / machinery or complete the civil and related works etc. in a timely manner, or at all, may result in time and cost over-runs.**

Our Company set up a Wholly Owned Subsidiary namely “Shri Ahimsa Healthcare Private Limited”, incorporated on September 28, 2022. Our company plans to invest ₹ 3,500 lakhs out of the Net proceeds of the Issue into our Wholly-Owned Subsidiary to establish a new manufacturing unit.

We intend to utilize portions of the Net Proceeds for Funding capital expenditure requirements as follows:

*(₹ in Lakh)*

Sr. No.	Particulars	Total estimated cost <sup>(1)(2)</sup>	Amount already deployed as on March 31, 2024	Amount proposed to be funded from the Net Proceeds
1.	Land & Site Development	300.00	286.84	0.00
2.	Building & Civil Const.	1,311.00	143.00	900.00
3.	Plant & Machinery	3,830.00	5.25	2,600.00
4.	Preliminary Expenses	12.54	12.54	0.00
5.	Preoperative Expenses	5.46	2.04	0.00
6.	Provision for Contingencies	109.00	0.00	0.00
7.	Working Capital Margin	500.00	0.33	0.00
	<b>Total</b>	<b>6,068.00</b>	<b>450.00</b>	<b>3,500.00</b>

<sup>(1)</sup> The estimated cost to be incurred is inclusive of GST.

<sup>(2)</sup> Total estimated cost, as per Detailed Project Report (“DPR”) dated August 23, 2024, prepared and issued by M/s Lodha Jain & Company, Independent Chartered Accountants and verified by M/s Jain Vinod & Co. Statutory Auditor in respect of the Proposed Project by way of their certificate dated August 30, 2024.

We have procured quotations from various vendors in relation to the capital expenditure in support of our proposed project. For details in respect of the foregoing, please see “*Objects of the Issue*” on page 97. It is important to note that such quotations have a limited validity period and may be subject to revisions, and other commercial and technical factors. We cannot assure that we will be able to undertake such capital expenditure at the costs indicated by such quotations or that there will not be cost escalations over and above the contingencies proposed to be funded out of the Net Proceeds. Further, the actual amount and timing of our future capital requirements may differ from our estimates due to unforeseen delays or cost overruns, unanticipated expenses, regulatory changes, engineering design changes, technological changes and any other reason.

As on the date of this Draft Red Herring Prospectus, we have placed orders for plant and machinery by giving an advance of ₹ 5.25 Lakhs i.e., approximately 0.13% of the total estimated cost for purchase of plant and machinery. We are yet to place orders for rest of the plant and machineries for an aggregate amount of ₹ 3,824.75 Lakhs. Accordingly, we are yet to place orders for 99.86 % of the total estimated cost in relation to the purchase of plant and machinery.

In the event of any delay in placing the orders, or an escalation in the cost of acquisition of the equipment or completion of the civil and related works, or if the vendors are not able to provide the equipment and services in a timely manner, or at all, we may encounter time and cost overruns. Further, if we are unable to procure equipment and ancillary items or avail services from the vendors from whom we have obtained quotations, we cannot assure that we will be able to identify alternative vendors to provide us with a similar kind of plant and machinery, equipment and ancillary items and services, which satisfy our requirements at acceptable prices. Our inability to procure the machinery equipment and services at acceptable prices or in a timely manner, may result in an increase in capital expenditure, extension or variation in the proposed schedule of implementation and deployment of the Net Proceeds, thereby resulting in an adverse effect on our business, prospects and results of operations. We intend to invest in the latest equipment and technology to support our expanding operations. We also seek to purchase equipment from domestic and foreign manufacturers and continue our strategy of minimal reliance on hired or leased equipment.

**5. A significant majority of our revenues from operations are derived from a limited number of customers.**

During the Financial Year 2024, Financial Year 2023 and Financial Year 2022, the contribution towards revenue from our single customer as well as that from top 5 and top 10 customers is as follows:

(in ₹ Lakhs)

Particular	For the Financial Year ended on					
	March 31, 2024		March 31, 2023		March 31, 2022	
	Amount	%	Amount	%	Amount	%
Revenue from single customer	5,149.50	65.95%	4,329.00	41.57%	1,866.87	32.16%
Revenue from Top 5 customers	6,631.60	84.93%	8,099.61	77.79%	4,202.48	72.40%
Revenue from Top 10 customers	7,312.94	93.66%	9,269.61	89.02%	5,045.74	86.93%

\*As certified by M/s. Jain Vinod & Co. Statutory Auditor, by certificate dated August 30, 2024 bearing UDIN: 24073827BKGTM8339

However, the composition of revenue generated from these customers might change as we continue to add new customers in the normal course of business. Our revenues may be adversely affected if there is an adverse development with such customer, including as a result of a dispute with or our quality issue with such major customers, which may result in significant reduction in our orders from such customers, and thereby decline in our revenue, cash flows and liquidity. Further, if our customers are able to fulfil their requirements through captive or in house manufacturing or any of our existing or new competitors providing products with better quality, or cheaper cost, we may lose significant portion of our business and revenue.

Additionally, consolidation of any of our customers may also adversely affect our existing relationships and arrangements with such customers, and any of our customers who are acquired may cease to continue the businesses that require products manufactured by us or may resort to our competitors for their supply requirements. Further, in the event our customers face any form of adverse effect due to exigent circumstances, resulting in a sustained decline in the demand for their products, including due to macroeconomic factors affecting the economy in general could prompt them to reduce their production volumes, in turn affecting their demand for our products. Our business from our customers is dependent on our continuing relationship with such customers, the quality of our products, and our ability to timely deliver their orders, and there can be no assurance that such customers will continue to do business with us in the future on commercially acceptable terms or at all. While we believe that we have maintained good and long-standing relationships with our customers, however, there can be no assurance that we will continue to have such long-term relationship with them. Significant dependence on a select and small group of customers may increase the potential volatility of our results of operations.

**6. We are dependent on third parties for the supply of raw materials and such providers could fail to meet their obligations, which may have a material adverse effect on our business, results of operations and financial condition.**

We are dependent on third-party suppliers for our raw materials. The raw materials used by us include Crude Caffeine. Discontinuation of production by these suppliers or a failure of these suppliers to adhere to the delivery schedule or the required quality could hamper our production schedule and therefore affect our business and results of operations. This dependence may also adversely affect the availability of key materials at reasonable prices thus affecting our margins and may have an adverse effect on our business, results of operations and financial condition. There can be no assurance that strong demand, capacity limitations or other problems experienced by our suppliers will not result in occasional shortages or delays in their supply of raw materials. If we experience a significant or prolonged shortage of raw materials from any of our suppliers, and are not able to procure the raw materials from other sources in the future, we would be unable to meet our production schedules of our products and to deliver such products to our customers on time, which would adversely affect our sales, margins and customer relations. We cannot assure you that a particular supplier will continue to supply the required components or raw materials to us in the future. Any change in the supply pattern of our raw materials can adversely affect our business and profits. We primarily source raw materials through imports with majority raw materials being imported raw materials. Any restrictions imposed by the Government of India, state authorities, or exporting countries may adversely impact our ability to deliver products, affecting our business, financial condition, and operational results. Additionally, an increase in import tariffs could raise costs, negatively impacting operations. While we have not faced any material instances in the past where such restrictions have adversely affected our operations, there can be no assurance that such restrictions / regulations would not be made more stringent which would consequently restrict our ability to import raw materials from other jurisdictions.

Further our purchases made from our single supplier (overseas), top 5 suppliers and top 10 suppliers, and for the Financial Year ended March 31, 2024, March 31, 2023 and March 31, 2022 are as follows:

(₹ in Lakhs)

Sr. No	Particulars	FY 2023-24		FY 2022-23		FY 2021-22	
		Purchases	%	Purchases	%	Purchases	%
1	Purchases from single supplier (overseas)	3,492.87	73.21%	2,447.17	64.54%	1,827.46	71.29%
2	Purchases from Top 5 suppliers	4,555.00	95.47%	3,358.43	88.58%	2,394.13	93.39%
3	Purchases from Top 10 suppliers	4,697.35	98.46%	3,756.11	99.07%	2,544.76	99.27%

\*As certified by M/s. Jain Vinod & Co. Statutory Auditor, by certificate dated August 30, 2024 bearing UDIN: 24073827BKGTL8752

For further details, please see **“Our Business”** on page no. 135 of this Draft Red Herring Prospectus.

While we may find additional suppliers to supply these products, any failure of our suppliers to deliver these products in the necessary quantities or to adhere to delivery schedules, credit terms or specified quality standards and technical specifications may adversely affect our business and our ability to deliver orders on time and at the desired level of quality.

As a result, we may lose customers which could have a material adverse effect on our business, financial condition, and results of operations. Further our product supply and pricing may become volatile due to several factors beyond our control, including global demand and supply, general economic and political conditions, transportation and labour unrest, natural disasters, competition, import duties, tariffs and currency exchange rates, and there are inherent uncertainties in estimating such variables. Therefore, we cannot assure that we will be able to procure adequate supplies of our products in the future, as and when we need them on commercially acceptable terms. Further, there can be no assurance that we will be able to effectively manage relationships with our existing or new suppliers or that we will be able to enter into arrangements with new suppliers at attractive terms or at all. If we fail to successfully leverage our existing and new relationships with suppliers, our business and financial performance could be adversely affected.

**7. Our cost of production is exposed to fluctuations in the prices of raw material particularly Crude Caffeine and our Company has not entered into any agreement with respect to long-term supply for raw materials required.**

The major raw material used is Crude Caffeine and the expenses incurred to procure this raw material contributes to 52.04%, 33.80%, and 42.11% of revenue from operations as per restated consolidated financial information for the Financial Years ended March 31, 2024, 2023 and 2022. The industry in which we operate is highly fluctuating specially the prices of Crude Caffeine. Further, factors affecting the price, directly or indirectly are beyond the control of our Company. We procure our raw material either from imports and have not entered into any long-term supply agreements with our suppliers. We may have to face the risks associated with compensating for or passing on such increase in our cost of raw material consumed on account of such fluctuations in prices to our customers. If we pass on the increase in the cost of raw material consumed to our customers through a corresponding increase in the price of our products to maintain our historical margins, we may face the risk of our products becoming unaffordable for a particular segment of demography. Upward fluctuations in the prices of raw material may thereby, affect our margins directly or indirectly and have a direct bearing on our profitability, resulting in a material adverse effect on our business, financial condition, and results of operations.

**8. Relevant documents of the Secretarial Records are not traceable by the Company.**

Some of our corporate records are not traceable. Certain corporate records and regulatory filings made by us, pertaining to allotment of 18,640 Equity Shares on April 01, 1994, allotment of 14,760 Equity Shares on March 31, 1995, allotment of 7,81,000 Equity Shares on July 10, 1995, allotment of 67,500 Equity Shares on July 10, 1996, allotment of 3,25,000 Equity Shares on April 15, 1997, allotment of 3,67,500 Equity Shares on February 16, 2004, allotment of 2,82,000 Equity Shares on February 07, 2009 and allotment of 10,00,000 Equity Shares on March 27, 2010, are not traceable except form return of allotment filed in this regard. Certain records relating to share transfers namely share transfer deeds are also not traceable. Further we were unable to trace records relating to change in the registered office of the Company from D-58A, Madho Singh Road, Banipark, Jaipur to E-92 to 94, G-79 to 83, RIICO Industrial Area, Bagru, Ext. Bagru-303007, Jaipur, Rajasthan, India in the year. For further details please refer chapter titled **“History and Certain Corporate Matters”** beginning on page no.160 of this Draft Red Herring Prospectus. M/s. Arms & Associates LLP, Practicing Company Secretaries has provided a search report dated October 12, 2024 confirming non-traceability of the documents as mentioned in the DRHP for search carried out on September 14, 2023 from the ROC Records and we have relied on the same. Further, we have also relied on other documents, including minutes, statutory register of members, annual reports, the audited financial statements of the Company for due diligence purpose. Further, while there have been no regulatory proceedings or actions initiated against us in relation to the aforementioned anomalies, non-compliance, or non-availability of the corporate records, we cannot assure you that the relevant corporate records will become available in the future, that regulatory proceedings or actions will not be initiated



against us in the future, or that we will not be subject to any penalty imposed by the competent regulatory authority in this respect. However, non-availability of these documents does not have any impact on the business and operations of the Company.

**9. Our Company has not complied with certain financial covenant of the financing facility and debt facility in past.**

In the past, there had been one instance where our Company was unable to service interest payments and principal repayments on time due to our inability to pay to State Bank of India (“SBI”). In the year 1996, our Company had availed Cash Credit Limit, Export Bills and L/C facilities from SBI for an amount of ₹47 Lakhs against mortgage of properties. The same was settled under SBI OTS SME 2010 Scheme and the entire compromise amounts was paid. SBI has issued a No Dues Certificate dated May 13, 2010. In relation to the settlement mentioned above, it is to be noted that SBI filed Original Application (OA) No. 37/2008 on 11.12.2008, before the Debt Recovery Tribunal (DRT), Jaipur, for the recovery of total ₹61,64,406/-. Following the settlement under the SBI OTS SME 2010 Scheme, the Original Application was dismissed on May 26, 2010. However, SBI later filed M.A. 04/2015 to recall the dismissal order, which was dismissed by the DRT on 09.05.2019. SBI has since appealed this order before the Debt Recovery Appellate Tribunal (DRAT), New Delhi and the matter is currently pending. For details, see “*Outstanding Litigation and Material Developments*” on page 240. There was no such instances thereafter, however we cannot assure you that no such instances will take place in the future. Furthermore, such events could adversely impact our business, results of operations, cash flows and financial condition.

**10. We have experienced growth in the past few years and if we are unable to sustain or manage our growth, our business and results of operations may be adversely affected.**

We have experienced growth in the past years with exceptional growth in the year 2023. The details of certain of our financial parameters showcasing this growth over the last three Financial Year ended March 31, 2024, 2023 and 2022 has been set out below:

(in Lakhs)

Particulars	March 31, 2024 (Consolidated)	March 31, 2023 (Consolidated)	March 31, 2022 (Standalone)
Revenue from Operations	7,808.16	10,412.78	5,804.40
EBITDA	2,746.03	5,246.20	1,812.69
Profit for the year after tax	1,870.08	3,820.80	1,102.15

Our growth in the Financial Year 2023 was exceptional and we might not be able to continue to maintain such exceptional growth going forward.

Our growth requires us to continuously invest in our operations, evolve and improve our operational, financial, and internal controls and administrative infrastructure. We may not be able to sustain our growth due to a variety of reasons, including but not limited to, the following:

- a decline in the demand for our products.
- acquiring new customers and increasing/maintaining demand of our products from existing customer
- maintaining the quality levels of our products.
- our ability to maintain high level of customer satisfaction.
- non-availability of raw materials,
- preserving a work culture and environment in our manufacturing facility; and
- a general slowdown in the economy.

A failure to sustain our growth may have an adverse effect on our business, financial condition, results of operations and future prospects. We cannot assure you that our future performance or growth strategy will be successful.

Further, as we scale up and diversify our products, we may not be able to execute our operations efficiently, which may result in delays, increased costs, and lower quality products. Further, if we are unable to increase our production capacity, we may not be able to successfully execute our growth strategy. Our failure to manage our growth effectively may have an adverse effect on our business, financial condition, results of operations and future prospects.

**11. We are subject to risks resulting from foreign exchange rate fluctuations, which could adversely affect our results of operations.**

Substantial purchase of raw materials is procured from foreign countries. Our export sales are also in foreign currencies, primarily the U.S. dollar and Euro. Foreign currencies have fluctuated in the past and our cost of raw materials and results of operations may be impacted by such fluctuations. As we aim to increase our export sales, our operating expenses in connection with our operations outside India will be increasingly denominated in currencies other than Indian Rupees. Any

fluctuations in the foreign currency exchange rates may have an adverse impact on our results of operations. The exchange rate between the Indian Rupee and other foreign currencies has changed considerably in recent years and may further fluctuate in the future. Such fluctuations in currency exchange rates may impact our results of operations. Based on our overseas business operations, we primarily deal in U.S. dollar and Euro. We have not adopted foreign exchange risk mitigation measures and we bear the complete risk of currency exchange rate fluctuations. We are affected by fluctuations in exchange rates and we cannot assure you whether future hedging or other risk management strategies will be effective. Our foreign currency exposures, exchange rate fluctuations between the Indian Rupee and foreign currencies, especially the U.S. dollar and Euro, may have a material impact on our results of operations, cash flows and financial condition.

**12. *We do not own some of the business premises where our, Registered Office, Offices and Manufacturing Facility, Storage & Warehouse facilities are located.***

Our premises on which our Registered Office and Manufacturing Facility is situated is taken on lease for a period of 99 years. Also, the other premises used by our Company for our business purposes are taken on lease/rent basis. For more details on properties taken on lease by our Company, see “***Our Business***” on page 135. If any such lease/rent agreements under which we occupy the premises are not renewed on terms and conditions that are favourable to us, or at all, we may suffer a disruption in our operations which could have a material adverse effect on our business, financial condition and results of operations. If we do not comply with certain conditions of the lease, the lessor may terminate the lease, which could have an adverse effect on our operations. While we have not experienced any issue in renewing the lease arrangement in the past, there can be no assurance that renewal of lease/rent agreements with the owner will be entered into.

In the event of non-renewal of lease/rent arrangements, we may be required to shift our business premises to a new location and there can be no assurance that the arrangement we enter into in respect of new premises would be on such terms and conditions as the present one.

**13. *Our Company is required to comply with certain conditions under approvals, applicable laws and regulations as an Export Oriented Unit (EOU). The non-fulfillment of which may expose Company to penalties and affect our business operations and our financial condition.***

Our unit is an Export Oriented Unit (EOU) and majority of the production is exported (including deemed exports). Under the terms of the EOU, our Company is required to comply with certain conditions, including specified export obligations and a positive Net Foreign Exchange (NFE).

While we are currently in compliance with the requirement of NFE as on date of this DRHP. Failure to meet these conditions may result in duties and penalties against our Company under the provisions of the Foreign Trade (Development and Regulation) Act, 1992 and the rules and regulations made thereunder, which may have an adverse effect on Company's business and results of operations.

**14. *We intend to utilise a portion of the Net Proceeds for Investment in Wholly Owned Subsidiary which is setting up a manufacturing unit (“Proposed Project”) which have not been appraised by any independent agency and are based on third-party consultants and may be subject to change based on various factors, some of which are beyond our control.***

We intend to utilise a portion of the Net Proceeds for funding Investment in Wholly Owned Subsidiary which is setting up a manufacturing unit (“Proposed Project”). For further details, see “***Our Business – Proposed Project***” on page 135. The same have not been appraised by any independent agency and are based on our estimates and third-party consultants, which are subject to change in the future. Our capital expenditure plans are subject to a number of variables, some of which may be beyond our control, including the changes in costs, our financial condition, business and strategy or external circumstances such as market conditions.

The costs of the project have been estimated in the DPR issued by M/s Lodha Jain & Company, Chartered Accountants based on the consultations and supportings as provided by the Wholly Owned Subsidiary. The cost of the project may escalate due to various factors which are beyond our control. Such estimates may be revised from time to time and consequently our funding requirements may also change. Such estimates may exceed the value that would have been determined by third party appraisals and may require us to reschedule our expenditure which may have a bearing on our expected revenues and earnings.

**15. *Our business is dependent on our manufacturing facilities, and we are subject to certain risks in our manufacturing process, any disruption, breakdown or shutdown of our Manufacturing Facilities may have a material adverse effect on our business, financial condition, results of operations and cash flow***

Our Manufacturing Facilities, are subject to the normal risks of industrial production, including equipment breakdowns, labour stoppages or disputes, shortage of skilled labour, natural disasters, directives from government agencies, water

shortages, power interruptions, performance below expected levels of output or efficiency, obsolescence, severe weather, industrial accidents, our inability to respond to technological advances and emerging industry standards and practices in the industry. The Company is taking due care of the medical and other requirement of the said worker in due compliance with the applicable laws and need to comply with the directives of relevant government and regulatory authorities.

Our business is dependent upon our ability to manage our manufacturing facilities and run them at certain utilization levels, which are subject to various operating risks, including those beyond our control, such as the breakdown and failure of equipment, industrial accidents, labour disputes or shortage of labour, severe weather conditions and natural disasters. While there have been no such instances in the past, any significant malfunction or breakdown of our machinery, our equipment, our automation systems, our IT systems or any other part of our manufacturing processes or system (together, our "Manufacturing Assets") may entail significant repair and maintenance costs and cause delays in our operations. If we are unable to repair Manufacturing Assets in a timely manner or at all, our operations may need to be suspended until we procure the appropriate Manufacturing Assets to replace the same and we cannot assure you that the new Manufacturing Assets will be procured and/or integrated in a timely manner. In addition, we may be required to carry out planned shutdowns of our facilities for maintenance, statutory inspections, testing and equipment upgrades.

As our customers rely significantly on the timely delivery of our products, uninterrupted power supply, supply of trained and skilled manpower, availability of raw materials and our ability to carry on interruption-free production of our products is critical to our business. Further, our electricity requirements for our manufacturing facilities are directly sourced from local utilities. While we maintain power backup in the form of diesel generator sets, we cannot assure you that we will successfully be able to prevent disruptions in our manufacturing processes in case of non-availability of adequate supply of power.

Further, any significant malfunction or breakdown of our machinery may entail significant repair and maintenance costs and cause delays in our operations. If we are unable to repair the malfunctioning machinery in a timely manner or at all, our operations may need to be suspended until we procure machinery to replace the same and we may be subject to manufacturing disruptions due to contraventions by us of any of the conditions of our regulatory approvals, which may require our manufacturing facilities to cease, or limit, production until the disputes concerning such approvals are resolved. While we have not experienced such instances, in the event such instances occur in the future, it may have an adverse effect on our business, financial condition and results of operations.

Presently, we have one Manufacturing Facility which is located within the periphery of Jaipur, Rajasthan and new Manufacturing Facility proposed to be set up by our Wholly Owned Subsidiary will also be in Jaipur, Rajasthan. We are dependent on our Manufacturing Facility for the production of our products and therefore, events impacting state of Rajasthan may disrupt our production and operations.

***16. Rajasthan State Industrial Development and Investment Corporation (RIICO) has granted us the lease hold rights of an industrial plot, complying with certain terms and condition of the lease may affect our business and financial condition.***

RIICO has granted lease hold rights for a period of 99 years of industrial plot no. E-94, RIICO Industrial Area, Bagru, Ext. Bagru - 303007, Jaipur, Rajasthan, India. This industrial plot is the Registered Office of the Company and its Wholly-Owned Subsidiary, the Company also has a manufacturing unit on the same industrial plot hence, non-compliance of any condition, a failure action might be initiated against us. Further, if RIICO identifies any dues towards the old allottee during audit observations then our Company is liable to deposit the same when demanded by RIICO. Complying with these conditions involves a substantial amount and money and may adversely affect our financial condition.

***17. Our Company is dependent on third party transportation providers for transportation of raw materials and finished goods. Accordingly, any increase in transportation costs or unavailability of transportation services for our products or transportation strikes may have an adverse effect on our business.***

Our Company is engaged in the business of the extraction, manufacturing, of Caffeine Anhydrous Natural, Green Coffee Extracts, and trading of other herbal extracts. Our manufacturing facility which is situated at E-94, RIICO Industrial Area, Bagru, Ext. Bagru-303007, Jaipur, Rajasthan, India. We procure raw materials through imports as well from domestic suppliers. Also, our finished goods are sold, delivered and exported to international as well as domestic markets. We have a presence in the state of Rajasthan in India and in 14 countries across the globe. The detailed breakup of the revenue of our company as per Restated Financial Information for the fiscal year ended on March 31, 2024, 2023 and 2022 is as under:

(₹ in Lakhs)

Particulars	For the Financial Year ended on					
	(Consolidated) 2024		(Consolidated) 2023		(Standalone) 2022	
	Amount	%	Amount	%	Amount	%
Export Sales						
- Direct Export	1,835.59	23.51	5,308.93	50.98	3,058.84	52.70
- EOU/Deemed Exports Sales	5,200.65	66.61	4,480.74	43.03	1,929.38	33.24
- Third Party Export	400.47	5.12	198.34	1.91	645.29	11.12
<b>Total Export Sales</b>	<b>7,436.71</b>	<b>95.24</b>	<b>9,988.01</b>	<b>95.92</b>	<b>5,633.50</b>	<b>97.06</b>
Domestic Sales	371.45	4.76	424.77	4.08	170.90	2.94
<b>Total</b>	<b>7,808.16</b>	<b>100.00</b>	<b>10,412.78</b>	<b>100.00</b>	<b>5,804.40</b>	<b>100.00</b>

\*As certified by M/s. Jain Vinod and Co. Statutory Auditor, by certificate dated August 30, 2024 bearing UDIN: 24073827BKGTM8339

Though our business has not experienced any disruptions due to transportation strikes in the past, any future transportation strikes may have an adverse effect on our business. Most of the raw material and finished products are transported to and from our manufacturing unit by third party transportation providers. Transportation strikes could have an adverse effect on our receipt of goods and our ability to deliver our products to our customers. Non availability of ships, containers and trucks could also adversely affect receipt of goods and the delivery of our products. Further, disruptions of transportation services due to weather-related problems, strikes, lockouts, inadequacies in the road infrastructure, or other events could impair ability to procure raw materials on time. Any such disruptions could materially and adversely affect our business, financial condition, and results of operations.

Customers may demand, among others, price reductions, set-off any payment obligations, require indemnification for themselves or their affiliates, any of which may have an adverse effect on our business, results of operations and financial condition. Cancellations, reductions or instructions to delay manufacturing (thereby delaying delivery of products manufactured by us) by a significant customer could adversely affect our results of operations by reducing our sales volume, as well as by possibly causing delay in our customers' paying us for the order placed for purchasing the inventory with us which we would have manufactured for them.

**18. There has been certain non-compliance with labour laws by our Company. Consequently, we may be subject to regulatory actions and penalties for such non-compliance and our business and financial condition may be adversely affected.**

In accordance with the Payment of Bonus Act, 1965 ("Bonus Act"), and the Payment of Bonus Rules, 1975 ("Bonus Rules"), Our Company is required to file the annual return of the bonus paid to its employees in Form D on the web portal of the Central Government's Ministry of Labour and Employment on or before February 1st, every year. Our Company has paid the bonus to its employees, but has not filed the required form for previous years. In accordance with the Payment of Bonus Act, 1965 ("Bonus Act"), and the Payment of Bonus Rules, 1975 ("Bonus Rules"), the Company filed the Common Annual Return (on Shram Suvidha Portal of Ministry of Labour & Employment) on September 03, 2024, for bonus of Rs. 12,72,450/- paid to employees of the Company on November 07, 2023. However, there is no provision in Bonus Act and rules regarding backward filing of annual returns of the Company. Therefore, for non-compliance of the provisions of Bonus Act and Bonus Rules, in previous years, our Company may be subjected to punishment under Section 28 of the Bonus Act.

Under Section 21 and Section 22 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act"), Our Company is mandated to submit an Annual Report to the District Officer every year. The Company submitted its Common Annual Report to the District Collector, Jaipur, on August 28, 2024. The said Report has been filed along with annual reports for the previous years. However, since the POSH Act and its associated rules do not provide for the retrospective filing of annual returns, the late filing of these Annual Report may not be accepted by the District Officer. Pursuant to Section 26(1) of the POSH Act, failure to comply with Section 22, which mandates the filing of an Annual Report containing details of complaints (if any) and their disposal, may result in a penalty of up to Rs. 50,000/- on the employer for non-compliance. Accordingly, the Company may be subject to penalties for non-compliance with the POSH Act and its rules in prior years.

**19. Our Promoter has provided personal guarantees for our loans and any failure or default by us to repay such loans in accordance with the terms and conditions of the financing documents could trigger repayment obligations, which may adversely affect our Promoters' ability to manage our affairs.**

We have obtained loans in the ordinary course of business for the purposes of working capital and other business requirements. Our Promoter Mr. Nemi Chand Jain, Mrs. Sumitra Jain, Mr. Amit Kumar Jain has issued personal guarantees in relation to certain borrowings of our Company. For details, see "*History and Certain Corporate Matters*" and

**“Statement of Financial Indebtedness”** on pages 160 and 227, respectively. Our Promoter may continue to provide such guarantees and other security post listing. In case of a default under our loan agreements, any of the guarantees provided by our Promoter may be invoked, which could negatively impact the reputation and net worth of our Promoter. In addition, our Promoter may be required to liquidate its shareholding in our Company to settle the claims of the lenders, thereby diluting their shareholding in our Company. Furthermore, in the event that our Promoter withdraws or terminates his guarantees, our lenders for such facilities may ask for alternate guarantees, repayment of amounts outstanding under such facilities, or even terminate such facilities.

We may not be successful in procuring guarantees satisfactory to the lenders, and as a result may need to repay outstanding amounts under such facilities or seek additional sources of capital, which could affect our financial condition and cash flows.

**20. We have had negative cash flows in the past. Sustained negative cash flow could adversely impact our business, financial condition and results of operations.**

We have experienced negative cash flows and may, in the future, experience negative cash flows. The following table sets forth certain information relating to our cash flows for the periods indicated below:

(₹ in Lakhs)

Particulars	For the Financial Year ended on (Standalone)		
	March 31, 2024	March 31, 2023	March 31, 2022
Net cash flow (used in)/from operating activities	569.72	2,018.45	1,435.92
Net cash flow (used in)/from investing activities	(1,704.50)	(977.33)	(583.15)
Net cash flow (used in)/from financing activities	978.17	(350.29)	(599.15)

For further information, see **“Restated Financial Information”** on page 192.

Negative cash flows over extended periods, or significant negative cash flows in the short term, could materially impact our ability to operate our business and implement our growth plans. As a result, our business, financial condition and results of operations could be materially and adversely affected.

**21. Our Company, our Promoters and Directors are parties to certain legal proceedings. Any adverse decision in such proceedings may have a material adverse effect on our business, results of operations and financial condition.**

Our Company, our Promoters and Directors are party to certain legal proceedings. These legal proceedings are pending at different levels of adjudication before various courts and legal forums. A summary of outstanding litigation proceedings involving our Company, our Promoters, and our Directors, as on the date of this Draft Red Herring Prospectus as disclosed in **“Outstanding Litigations and Material Developments”** on page 271, in terms of the SEBI ICDR Regulations and the Materiality Policy is provided below:

Types of proceedings	Number of cases	Total amount involved (₹ in lakhs) <sup>##</sup>
<b>Litigation involving our Company</b>		
<b>Against our Company</b>		
Criminal proceedings	1	Not ascertainable
Action taken by statutory and regulatory authorities	Nil	Nil
Material civil litigation	1	Nil*
Taxation cases	2	9.74
<b>By our Company</b>		
Material civil litigation	1	Not ascertainable
Criminal cases	1	2.5
<b>Total</b>	<b>6</b>	<b>12.24</b>
<b>Litigation involving our Directors other than our Promoter</b>		
<b>Against our Directors</b>		
Criminal proceedings	2	Nil <sup>#</sup>
Action taken by statutory and regulatory authorities	Nil	Nil
Material civil litigation	Nil	Nil
Taxation cases	Nil	Nil
<b>By our Directors</b>		
Material civil litigation proceedings	Nil	Nil
Criminal cases	Nil	Nil
<b>Total</b>	<b>2</b>	<b>Nil</b>
<b>Litigation involving our Promoters</b>		

<b>Against our Promoters</b>		
<i>Criminal proceedings</i>	1 <sup>***</sup>	Not ascertainable
<i>Disciplinary action taken against our Promoter in the five Fiscals preceding the date of this Prospectus by SEBI or any stock exchange.</i>	Nil	Nil
<i>Action taken by statutory and regulatory authorities</i>	Nil	Nil
<i>Material civil litigation</i>	1 <sup>**</sup>	Nil*
<i>Taxation cases</i>	Nil	Nil
<b>By our Promoters</b>		
<i>Criminal cases</i>	5 <sup>^^</sup>	Not ascertainable
<i>Material civil litigation</i>	1 <sup>^</sup>	Not ascertainable
<b>Total</b>	<b>7</b>	<b>Not ascertainable</b>

<sup>##</sup> The aforementioned amounts are stated to the extent they can be quantified, and rounded off to the nearest rupees in thousand, with precision up to two decimal places. The amount may be subject to additional interest/other charges being levied by the concerned authorities which are unascertainable as on date of this DRHP.

\* In Original Application no. 37/2008 before Court of Presiding Officer, Debt Recovery Tribunal (DRT), Jaipur an amount of ₹18,28,551/- was paid by our Company towards full settlement of dues to State Bank of India (SBI). Then SBI filed M.A. 04/2015 for recalling of said order and restoration of the Original Application. On 09.05.2019, DRT, Jaipur dismissed M.A. 04/2015 and directed SBI to pay a cost of ₹50,000/- to our Company and our Promoter Mr. Nemi Chand Jain. SBI then has filed an appeal against the DRT order before the Debts and Recovery Appellant Tribunal (DRAT), New Delhi bearing appeal no. 337/2019. Since, the amount could not be ascertained in this case, it has been included with NIL amount.

# In case Title Suit no. 78 of 2005 before Court of the Civil Judge (Senior Division) No. 1, Kamrup at Guwahati, against our Director Dipak Kumar Jain, Mr. Mahabir Prasad Jain has claimed an arbitrary and unsubstantiated damages of ₹10 Crores under Section 501 of the Indian Penal Code, 1860 for defamation by libel. However, the actual amount involved could not be ascertained. Hence, it has been included with 'Nil' amount.

\*\* same cases as pending against our Company, wherein our Promoters Mr. Nemi Chand Jain is a party.

\*\*\* same cases as pending against our Company, wherein our Promoters Mr. Nemi Chand Jain and Mrs. Sumitra Jain are parties.

^ This case titled 'Shri Ahimsa Mines and Minerals Limited, Nemi Chand Jain vs. Shri Narendra Kumar Jain and Anr. (S.B. Civil Regular First Appeal No. 192/2007) is the same as filed by our Company wherein our Promoter Nemi Chand Jain is also a party.

^^ Out of these 5 cases, one case titled 'Shri Ahimsa Mines and Minerals Ltd., Nemi Chand Jain vs. Aditya Birla Finance Limited and Oꤵ (Criminal Complaint no. 1811/2024)' is same as pending against the Company, wherein our Promoter Nemi Chand Jain is also a party.

There can be no assurance that litigations involving our Company, our Promoters and Directors will be decided in favour of our Company, Promoters, Directors and consequently it may divert the attention of our management and Promoters and consume our corporate resources and we may incur significant expenses in such proceedings and we may have to make provisions in our financial statements, which could increase our expenses and liabilities. If such claims are determined against Company, our Promoters and Directors, there could be a material adverse effect on our reputation, business, financial condition and results of operations, which could adversely affect the trading price of our Equity Shares.

Furthermore, we may not be able to quantify all the claims in which we are involved. Failure to successfully defend these or other claims or if our current provisions prove to be inadequate, our business and results of operations could be adversely affected. Even if we are successful in defending such cases, we will be subjected to legal and other costs relating to defending such litigation, and such costs could be substantial. In addition, we cannot assure that similar proceedings will not be initiated in the future. This could adversely affect our business, cash flows, financial condition, and results of operation. For further details, pertaining to material pending outstanding litigations involving our Company, our Wholly-Owned Subsidiary, our Promoters and Directors, see "**Outstanding Litigations and Material Developments**" on page 271.

## **22. We may be subject to potential risk associated with past criminal proceedings involving one of the Promoter the Company.**

A case titled 'Shri Deepak Ratan Ahire vs. Mr. Nemi Chand Jain and Ors.' (Criminal Case no. 222/2007)' was filed before the Court of Judicial Magistrate First Class, Vasai, by Mr. Deepak Ratan Ahire against Mr. Nemi Chand Jain (One of our Promoter) and Mr. Pawan Kumar Bajaj for offences under Section 323, Section 504, Section 506 and Section 34 of the Indian Penal Code, 1860. The matter was later disposed off without any adverse action. However, we are currently unable to provide further details, as the relevant documents are not available at this time, including the disposal order. Although the matter has been disposed, the absence of these records could present potential risks. Any new developments or unfavourable

decision related to this matter could adversely affect the reputation of our Promoter, Nemi Chand Jain and may have an adverse impact on the business operations and goodwill of the Company. Further, we cannot assure that this matter will not be re-opened in future and if so happens, it may have an adverse impact on the business and reputation of our Company.

**23. There have been certain instances of delays in filing GSTR-3B returns by our Company in the past. Any failure or delay in filing GST returns may expose us to statutory and regulatory action, as well as significant penalties, and may adversely impact our business, results of operations, cash flows and financial condition.**

Our Company is required to file GSTR-3B returns as per the GST Law. The table below sets out details related to delays in filing GSTR-3B by our Company including period of delay, payment dates and reason for delays during the Financial Years 2022-23, 2021-22 and 2019-20:

F.Y. 2019-20 <sup>(1)</sup>				
Period	Due Date of filing return	Date of filing return/Payment date	Delay in days	Reason for delay
April-19	20.05.2019	03.07.2019	44	1. Apr-19 to Jan-19: Delay due to mistake by some of the accounts team members of the Company. 2. Feb-20 to Mar-20: Delay was caused on account of the nationwide lockdown due to Covid-19 outbreak.
May-19	20.06.2019	07.08.2019	48	
June-19	20.07.2019	20.08.2019	31	
July-19	22.08.2019*	18.11.2019	88	
August-19	20.09.2019	11.12.2019	82	
September-19	20.10.2019	11.12.2019	52	
October-19	20.11.2019	19.12.2019	29	
November-19	20.12.2019	25.01.2020	36	
December-19	20.01.2020	27.01.2020	7	
January-20	20.02.2020	17.03.2020	26	
February-20	20.03.2020	11.05.2020	52	
March-20	20.04.2020	20.06.2020	61	

<sup>(1)</sup>The Company has duly paid late fees on account of delayed filing of GSTR-3B returns. Further, the Company has also paid applicable interest on delayed payment of GST.

\*Note: Original due date was 20.08.2019. Same was extended vide Notification No. 29/2019-CENTRAL TAX dated 28.06.2019 as amended from time to time.

F.Y. 2021-22 <sup>(2)</sup>				
Period	Due Date of filing return	Date of filing return/Payment date	Delay in days	Reason for delay
April-21	20.05.2021	04.06.2021	15	Delay in the month of April and May, 2021 on account of nationwide lockdown due to Covid-19 outbreak.
May-21	20.06.2021	29.06.2021	9	

<sup>(2)</sup>The Central Government vide Notification No. 76/2018-CENTRAL TAX dated 31.12.2018 as amended from time to time had waived off the late fee payable on late filing of GSTR-3B for the period April-21 and May-21 where the return was filed within 15 days from the due date of furnishing return. Therefore, the Company was not liable to pay any late fees for delay in filing GSTR-3B for April-21 and May-21. Further, the Company has duly paid applicable interest on delayed payment of GST.

F.Y. 2022-23 <sup>(3)</sup>				
Period	Due Date of filing return	Date of filing return/Payment date	Delay in days	Reason for delay
May-22	20.06.2022	22.06.2022	2	Delay in the month of May, 2022 due to absence of accounts team members on due date of filing of return.

<sup>(3)</sup>The Company has duly paid late fees on account of delayed filing of GSTR-3B return. Further, the Company has also paid applicable interest on delayed payment of GST.

There have been certain instances of delays in filing GSTR-3B returns for the financial year 2019-20. However, the Company has undertaken necessary corrective measures, including reconstitution of the accounts team, to ensure timely filing of returns. Consequently, subsequent returns have been filed within the prescribed due dates, with the exception of returns filed during the COVID-19 pandemic period, specifically for April 2021 and May 2021.

The Company has duly filed all other GSTR-3B returns for the financial years 2019-20, 2021-22, and 2022-23. While the Company has taken appropriate steps to improve its compliance framework, it cannot provide assurance that delays in

filing GSTR-3B returns will not occur in the future. Any failure or delay in filing such statutory returns may expose the Company to statutory and regulatory actions, including significant penalties, which could adversely impact its business operations, financial performance, cash flows, and overall financial condition.

**24. *We may not be able to successfully manage the growth of our operations and execute our growth strategies which may have an adverse effect on our business, financial condition, results of operations and future prospects.***

As we continue to grow, we must continue to improve our managerial, technical and operational knowledge and allocation of resources, and implement an effective management information system. In order to fund our ongoing operations and future growth, we need to have sufficient internal sources of liquidity or access to additional financing from external sources, including debt or equity. Further, we will be required to manage relationships with a greater number of customers, suppliers, distributors, service providers, lenders and other third parties. We will need to further strengthen our internal control and compliance functions to ensure that we will be able to comply with our legal and contractual obligations and minimize our operational and compliance risks. There can be no assurance that we will not suffer from capital constraints, operational difficulties or difficulties in expanding existing business and operations and training an increasing number of personnel to manage and operate the expanded business. There can be no assurance that we will be able to successfully manage our growth, strategies or that our expansion plans will not adversely affect our existing operations and thereby have an adverse effect on our business, financial condition, results of operations and prospects.

Further, we could also encounter difficulties and delays in executing our growth strategies due to a number of factors, including, unavailability of human and capital resources, inability to develop adequate systems, infrastructure and technologies, delayed payments or non-payments by customers, failure to correctly identify market trends, increase in cost of raw material, fuel, labour etc. There can be no assurance that we will be able to execute our growth strategy on time and within the estimated costs, or that we will meet the expectations of our customers.

**25. *We are dependent upon the business experience and skill of our promoters, key managerial personnel and senior management personnel. Loss of our Senior Management or our inability to attract or retain such qualified personnel, could adversely affect our business, results of operations and financial condition.***

We believe that our Promoters have played a key role in the development of our business and we benefit from their industry knowledge and expertise, vision and leadership. Our Promoters namely Mr. Nemi Chand Jain, Mr. Amit Kumar Jain, and Mr. Sumit Jain have strong operational knowledge, and good relationships with our customers in the line of business in which Company operates. In addition to our Promoters, our key management and senior management team includes qualified, experienced and skilled professionals who possess requisite experience across various division of our business. We believe the stability of our management team and the industry experience brought on by our individual Promoters enables us to continue to take advantage of future market opportunities. We believe that our senior management team is well qualified to leverage our market position with their collective experience and knowledge in the industry, to execute our business strategies and drive our future growth.

Our ability to meet continued success and future business challenges depends on our ability to attract, recruit and retain experienced, talented and skilled professionals. The loss of the services of our key personnel or our inability to recruit or train sufficient number of experienced personnel or our inability to manage the attrition levels in different employee categories may have an adverse effect on our financial results and business prospects. We have not faced any attrition of key managerial personnel and senior management personnel in the last three (3) financial years. However, we cannot assure that there will be no attrition of our senior management personnel in the future.

If we are unable to hire additional qualified personnel or retain them, our ability to expand our business may be impacted. Our Company's profitability, financial condition and results of operations may also be impacted due to lack of experienced and talented workforce. Senior management attrition may also result in our Company incurring higher costs, including the cost of recruiting and costs associated with onboarding. As we intend to continue to expand our operations, we will be required to continue to attract and retain experienced personnel. We may also be required to increase our levels of employee compensation more rapidly than in the past to remain competitive in attracting suitable employees.

**26. *We require certain approvals and licenses in the ordinary course of business and are required to comply with certain rules and regulations to operate our business, any failure to obtain, retain and renew such approvals and licences or comply with such rules and regulations may adversely affect our operations.***

We require several statutory and regulatory permits, licenses and approvals to operate our business. Many of these approvals are subject to periodical renewal. Any failure to renew the approvals that may expire, or to apply for the required approvals,



licences, registrations or permits, or any suspension or revocation of any of the approvals, licences, registrations and permits that have been or may be issued to us, could result in delaying the operations of our business, which may adversely affect our business, financial condition, results of operations and prospects.

While we have obtained the necessary and material approvals, licenses, registrations and permits from the relevant authorities, there were few instances where we may not have applied, obtained or applied with a delay for certain requisite approvals applicable to us. For instance, registration under the Shops & Establishment Act was not obtained for our Warehouses situated at (i) Chirota Bagru RIICO, Rajdharam Filling Petrol Pump Ka Pass Dis., Jaipur; (ii) Khasra No 585/42, Gram Chirota, Panchayat Ajay rajpura Tehsil Sanganer Dist, Jaipur; and (iii) Khasra No 237/1, 240/3, 242/1 Gram Chirota, Panchayat Ajay rajpura Tehsil Sanganer Dist, Jaipur, which we have now applied for and is under process. We may be subject to penalties or other charges which could adversely affect the financial position of our Company for not obtaining registrations for these warehouses.

We also need to apply for renewal, from time to time, of some of such approvals, licenses, registrations and permits, which expire or seek fresh approvals, as and when required, in the ordinary course of our business. While we generally apply for the renewal of approvals in a timely manner, we cannot assure that such approvals will be issued or granted to us in a timely manner, or at all. If we do not receive such approvals or are not able to renew the approvals in a timely manner, our business and operations may be adversely affected.

Further, some of our permits, licenses and approvals are subject to several conditions and we cannot provide any assurance that we will be able to continuously meet such conditions or be able to prove compliance with such conditions to the statutory authorities, which may lead to the cancellation, revocation or suspension of relevant permits, licenses or approvals which may result in the interruption of our operations and may have a material adverse effect on our business, financial condition, cash flows and results of operations. If we fail to comply with all applicable regulations or if the regulations governing our business or their implementation change, we may incur increased costs, be subject to penalties or suffer a disruption in our business activities, any of which could adversely affect our results of operations. For further details, see “**Key Industry Regulations and Policies in India**” and “**Government and Other Statutory Approvals**” for permits/licenses required for the business on pages 153 and 279 respectively.

#### ***27. We have in past entered into related party transactions and we may continue to do so in the future***

As of March 31, 2024, we have entered into several related party transactions with our Promoter. In addition, we have in the past also entered into transactions with other related parties. We confirm that the transactions with Related Parties entered into by our Company in the preceding three years have been carried out at arms’ length price and are in compliance with applicable laws. Further, we confirm that the transactions are not prejudicial to the interest of our Company. A summary of the related party transactions in Financial Year 2024, 2023 and 2022 as per applicable Ind GAAP is derived from our Restated Financial Statements. For further details, see “**Restated Financial Information**” on page 121.

While we believe that all our related party transactions have been conducted on an arm’s length basis, we cannot assure you that we may not have achieved more favourable terms had such transactions been entered into with unrelated parties. There can be no assurance that such transactions, individually or taken together, will not have an adverse effect on our business, prospects, results of operations and financial condition, including because of potential conflicts of interest or otherwise. In addition, our business and growth prospects may decline if we cannot benefit from our relationships with them in the future. Any future related party transactions would be entered into by the Company in compliance with the applicable rules and regulations.

#### ***28. An inability to renew quality accreditations in a timely manner or at all, or any deficiencies in the quality of our products may give rise to product liability claims and negatively affect our business prospects and financial performance.***

We obtain and maintain quality certifications and accreditations from independent certification entities and also comply with prescribed specifications and standards of quality approved by certification issuing agencies. For further details, see “**Government and Other Approvals**” on page 248.

Although there has been no such instance in the past, in case, if we fail to comply with applicable quality standards or if we are otherwise unable to obtain such quality accreditations in the future in a timely manner or at all, our business prospects and financial performance may be negatively affected.

Further, if our products are alleged or found to be defective, we may be subject to product liability claims. There could be instances in which our products do not meet the specifications. We have, at some times, encountered certain claims with respect to the quality of our products and we may be subject to product liability claims and litigation for compensation in the future also which could result in substantial and unexpected expenditure and could materially affect our cash flow and

operating results. Further, there can be no assurance that we will be able to successfully defend such claims. If any such claims against us are ultimately successful, we could be required to pay substantial damages, which could materially and adversely affect our business, financial condition, results of operations and cash flows.

**29. *We generally do business with our customers on a purchase order basis and our customers do not make long-term commitments with us and may cancel or change their production requirements. Such cancellations or changes may adversely affect our financial condition, cash flows and results of operations.***

We primarily follow a business-to-business model which is purchase order based. While we have long standing relationships with various of our customers, we generally do not enter into long-term arrangements, or arrangements with firm commitments of quantities with such customers, and do not have clear visibility as to their future demand for our products. Our customers may cancel, change or delay production quantities and schedules, or fail to meet their forecasts for a number of reasons beyond our control. Our customer's expectations can also change rapidly, requiring us to take on additional commitments or risks. In addition, customers may fail to meet their payment commitments to us. Cancellations, reductions or delays by a significant customer, or by a group of customers, could adversely affect our operating results and negatively affect our working capital levels.

Further, we are not necessarily be the exclusive supplier to our customers and our competitors may also be supplying their products to our customers. The absence of long-term arrangements, or arrangements with firm commitments of quantities from our customers and the possibility of rapid changes in demand for their products affect our ability to accurately estimate their future requirements. Considering that certain of our operating expenses are fixed, a reduction in customer demand can harm our operating results. Moreover, because our margins vary across customers and specific programs, a reduction in demand with higher margin customers can have a more significant adverse effect on our operating results. Low utilization of our manufacturing facilities could also result in our realizing lower margins.

**30. *Our inability to accurately forecast demand or price for our products and manage our inventory may adversely affect our business, results of operations, financial condition and cash flows.***

Our business depends on our estimate of the demand for our products from customers. We estimate demand for our products based on past sales and advance purchase order. If we overestimate demand, we may purchase more raw materials and manufacture more products than required. If we underestimate demand, we may manufacture fewer quantities of products than required, which could result in delayed or non-fulfilment of purchase orders resulting in loss of customers, goodwill and business. In addition, if our products do not achieve widespread acceptance or our customers, change their procurement preferences, we may be required to incur significant inventory markdowns or may not be able to sell the products at all, which would affect our business, results of operations and financial condition. As such, our inability to accurately forecast demand for our products and manage our inventory may have an adverse effect on our business, results of operations, cash flows and financial condition.

**31. *Our Company will not receive any proceeds from the Offer for Sale portion, and the Promoter Selling Shareholders shall be entitled to the Offer Proceeds to the extent of the Equity Shares offered by them in the Offer for Sale.***

The Offer includes an offer for sale of 20,00,000 Equity Shares which comprise of 10,00,000 Equity Shares each by Promoter Selling Shareholders(s) i.e. Mr. Nemi Chand Jain and Mrs. Sumitra Jain. The Promoter Selling Shareholders are, therefore, interested in the Offer Proceeds to the extent of the Equity Shares offered by them in the Offer for Sale. The entire proceeds (net of applicable offer related expenses) from the Offer for Sale will be paid to the Promoter Selling Shareholders in proportion to their respective portions of the Offered Shares transferred pursuant to the Offer for Sale, and our Company will not receive any such proceeds. See "*Objects of the Issue*" on page 97.

**32. *We have availed unsecured loans which are repayable on demand. Any demand for repayment of such unsecured loans, may adversely affect our cash flows.***

As on March 31, 2024, we have unsecured loans amounting to ₹ 118.45 lakhs which are repayable on demand. Further, these loans are not repayable in accordance with any agreed repayment schedule and may be recalled by the relevant lender (such lenders being Related Party) at any time. Any such unexpected demand or accelerated repayment may have a material adverse effect on the business, cash flows and financial condition of the borrower against which repayment is sought. Any demand from lenders for repayment of such unsecured loans, may adversely affect our cash flows. For further details of unsecured loans of our Company, see "*Statement of Financial Indebtedness*" on page 227.

**33. Our lender has charge over our movable and immovable properties in respect of finance availed by us.**

We have provided security in respect of loans / facilities availed by us from bank by creating a charge over our movable and immovable properties. The total amount outstanding and payable by us as secured loans was ₹1,264.33 lakhs, as on March 31, 2024. In the event we default in repayment of the loans / facilities availed by us and any interest thereof, our assets may be subject to forfeiture by lenders, which in turn could have significant adverse effect on our business, financial condition or results of operations. For further details of the secured loans availed by us, see “*Statement of Financial Indebtedness*” on page 227.

**34. We have identified certain inaccuracy, delayed and incorrect filings that are required to be made with the Registrar of Companies (RoC) by our Company and our Wholly-Owned Subsidiary Company.**

Our Company and Wholly-owned subsidiary have encountered certain inadvertent inaccuracies, delays, and incorrect regulatory filings in the past. As a result, we may face regulatory actions and penalties for any historical or future inaccuracies, delays, and incorrect filings, which may potentially adversely impacting our business and financial condition.

The few instances where our company has delayed filing with the Registrar of Companies as mentioned below:

Delayed filings				
Sr. No.	Date of occurrence of delay	Particulars of delayed filing	Steps taken to rectify such delayed filing	Fine/penalties imposed
1.	April 01, 2013	Form 25 for Revision remuneration of Amit Jain	Form was filed with additional fees	Additional fess ₹4,500
2.	April 01, 2013	Form 25 for Revision in remuneration of Nemi Jain	Form was filed with additional fees	Additional fess ₹4,500
3.	April 01, 2013	Form 25 for appointment of Mrs. Sumitra Jain as Whole Time Director	Form was filed with additional fees	Additional fess ₹4,500
4.	September 30, 2014	Form 23AC and 23ACA for FY ended March 31, 2014	Form was filed with additional fees	Additional fess of ₹1,200
5.	October 13, 2017	Form CHG - 1 for Modification of charge ID-10482108	Form was filed with additional fees	Additional fess of ₹1,200
6.	August 31, 2021	Form MGT-14 for political contribution	Form was filed with additional fees	Additional fess of ₹7,200
7.	September 31, 2022	Form AOC-4 for FY ended March 31, 2022	Form was filed with additional fees	Additional fess of ₹800
8.	August 01, 2023	Form DIR- 12 for appointment and redesignation of Mr. Dipak Kumar Jain as Whole-Time Director	Form was filed with additional fees	Additional fess of ₹2400

*Note: The Company has filed certain delayed forms under the Companies Fresh Start Scheme, 2020 (CFSS), thereby Company has regularized such delayed filing.*

The few instances where our Wholly-Owned Subsidiary Company has delayed filing with the Registrar of Companies as mentioned below:

Sr. No.	Date of occurrence of delay	Particulars of delayed filing	Steps taken to rectify such delayed filing	Fine/penalties imposed
1.	November 05, 2022	Form SH-7 for Increase in Authorised Share Capital of the Company	Form was filed with additional fees	Additional fess of ₹8,784
2.	November 11, 2022	Form MGT-14 for filing of Board Resolution approving Rights Issue of Equity Shares	Form was filed with additional fees	Additional fess of ₹600
3.	January 13, 2023	Form PAS-3 for allotment of Rights Issue Shares	Form was filed with additional fees	Additional fess of ₹9,000
4.	May 15, 2023	Form SH-7 for Increase in Authorised Share Capital of the Company	Form was filed with additional fees	Additional fess of ₹96,536
5.	May 15, 2023	Form MGT-14 for filing of Board Resolution approving Rights Issue of Equity Shares	Form was filed with additional fees	Additional fess of ₹6,000

6.	May 10, 2023	Form PAS-3 for allotment of Rights Issue Shares	Form was filed with additional fees	Additional fess of ₹10,800
7.	June 16, 2023	Form SH-7 for Increase in Authorised Share Capital of the Company	Form was filed with additional fees	Additional fess of ₹46,233
8.	June 16, 2023	Form MGT-14 for filing of Board Resolution approving Rights Issue of Equity Shares	Form was filed with additional fees	Additional fess of ₹7,200
9.	June 15, 2023	Form PAS-3 for allotment of Rights Issue Shares	Form was filed with additional fees	Additional fess of ₹10,800
10.	March 17, 2024	Form MGT-14 for filing of Board Resolution approving Rights Issue of Equity Shares	Form was filed with additional fees	Additional fess of ₹6,000
11.	March 08, 2024	Form PAS-3 for allotment of Rights Issue Shares	Form was filed with additional fees	Additional fess of ₹5,400

There have also been instances wherein the disclosures made in the statutory filings done under Companies Act, 2013 are incomplete or erroneous in nature for instance the number of shareholders and categorization of Directors in the annual filings. Furthermore, some attachments which were required to be attached in the forms filed were not attached by the Company. Also, the few attachments were not duly signed and stamped by the requisite authority.

Following are the instances wherein the disclosures made in the statutory filings done under Companies Act, 2013 are incomplete or erroneous in nature.

Sr. No	Date of occurrence of discrepancies	Form	Particulars of discrepancies/ incomplete filing/ erroneous filing	Corrective measures undertaken
1	August 11, 2023	MR-1 - Return of appointment of key managerial personnel	The Board Resolution for the appointment is dated August 11, 2023, while the date of appointment in Form MR-1 and DIR-12 is stated as August 1, 2023. The Board Resolution does not provide for effective date of appointment. This was an inadvertent error, resulting in inaccurate filings.	One time clerical error cannot be made good.
2	January 06, 2023	Form DIR -12 - Particulars of appointment of directors and the key managerial personnel and the changes among them.	The attached Consent letter of Mr. Amit Kumar Jain is unsigned, resulting it to be an erroneous filing.	One time clerical error cannot be made good
3	September 30, 2022	Form MGT-7 – Annual Return	In Form MGT-7, under Section VII (*NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS), the number of promoters at the beginning of the year is incorrectly recorded as 6 instead of 5. This error was carried forward from the previous year's filing, resulting in inaccurate filings.	Form GNL-2 filed with ROC.
4	September 30, 2021	Form MGT-7 – Annual Return	In Form MGT-7, under Section VI (a) *SHARE HOLDING PATTERN – Promoter, the total number of shareholders (promoters) is stated as 5, whereas under Section VII *NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS, indicates 6 promoters at the end of the year. This was an inadvertent error, resulting in	Form GNL-2 filed with ROC.

			inaccurate filings.	
5	September 30, 2019	Form ADT-1 - Information to the Registrar by Company for appointment of Auditor	The attached certified copy of the Ordinary Resolution and the Auditor's consent are unsigned, resulting in an erroneous filing.	One time clerical error cannot be made good
6	September 30, 2020	Form MGT-7 – Annual Return	In Form MGT-7, under Section VII *NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS, the number of promoters is incorrectly stated as 7 instead of 5. This error was carried forward from the previous year's filing, resulting in inaccurate filings.	Form GNL-2 filed with ROC.
7	September 30, 2019	Form MGT-7 – Annual Return	In Form MGT-7, under Section VII *NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS, the number of promoters is incorrectly stated as 7 instead of 5. This error occurred because Mr. Nemi Chand Jain and Mr. Amit Kumar Jain were counted twice, as they held both equity and preference shares, resulting in a discrepancy.	Form GNL-2 filed with ROC.

Although the late filing fees levied are small but if we continue this practice, the accumulated amounts of each delay may adversely affect our cash flows. It is important to note that as of now, no show cause notices have been issued against our Company and our Wholly-Owned Subsidiary Company in relation to the aforementioned matters. However, in the event that the relevant authorities take cognizance of these issues, actions may be initiated against our Company, our Wholly-Owned Subsidiary Company and its Directors. Such actions could have implications on the financials of our Company, our Wholly-Owned Subsidiary Company and our Directors.

Furthermore, as we expand our operations, there is no guarantee that deficiencies in our internal controls and compliance will not arise. We cannot assure that we will be able to effectively implement and consistently maintain adequate measures to rectify or mitigate any such deficiencies in our internal controls, whether in a timely manner or at all.

**35. Information relating to the installed production capacity and capacity utilization of our production Units included in this Draft Red Herring Prospectus are based on various assumptions and estimates and future production and capacity may vary.**

Information relating to the installed manufacturing capacity of our manufacturing facilities and capacity utilization included in this Draft Red Herring Prospectus are based on various assumptions and estimates of our management, and the capacities of principal and ancillary equipment used in the manufacture of our products. For details of capacity utilisation, see **“Our Business – Capacity utilisation”** on page 135.

While we have relied on certificate issued by Er. K. S Saini, Chartered Engineer, obtained by our Company and utilization is calculated by dividing actual production, in relation to such annual installed capacity of our manufacturing facilities and capacity utilisation, future capacity utilisation may vary significantly from the estimated production capacities of our manufacturing facilities and historical capacity utilisation. For further information, see **“Our Business – Our Manufacturing Facilities”** on page 135. Further, the installed capacity, capacity utilisation and other related information may not be computed on the basis of any standard methodology that is applicable across the industry and therefore may not be comparable to capacity information that may be computed and presented by other comparable companies in the industry in which we operate.

Accordingly, actual production levels and rates may differ significantly from the installed capacity information of our facilities or historical installed capacity information of our facilities depending on the product type. Undue reliance should therefore not be placed on our historical installed capacity information for our existing facilities included in this Draft Red Herring Prospectus.

**36. Our business is dependent on the delivery of adequate and uninterrupted supply of electrical power and water at a reasonable cost and any shortage, disruption or non-availability of power and water may adversely affect our entire processing requirements and have an adverse impact on our business, results of operations and financial condition.**

Adequate and cost-effective supply of electrical power and water is critical to our operations. The power requirement for our Manufacturing Facilities is sourced from the Jaipur Vidyut Vitran Nigam Ltd. We maintain power back-ups through DG Sets to ensure unhindered production, in case of power cuts by the local electricity providers. However, an interruption in or limited /supply of electricity may result in suspension of our operations. A prolonged suspension in production could materially and adversely affect our business, financial condition or results of operations. Further, if the per unit cost of electricity is increased, our power costs will increase. It may not be possible to pass on any increase in our power costs to our customers, which may adversely affect our profit margins.

Our operations and facilities are especially dependent on a steady and stable supply of water which we source from local connection. Any irregular or interrupted supply of water could adversely affect our daily operations. For details, see “**Our Business**” on page 135. If there is an insufficient supply of water to satisfy our requirements or a significant increase in prices, we may need to limit or delay our production, which could adversely affect our business, financial condition and results of operations. We cannot assure you that we will always have access to sufficient supply of power and water in the future to accommodate our requirements and planned growth. Accordingly, any increase in power costs and water costs could adversely affect our profitability.

**37. We have contingent liabilities that have not been provided for in our Company’s financials which if materialised, could adversely affect our financial condition.**

As of March 31, 2024, we had ₹ 11.02 Lakhs of contingent liabilities that had not been provided for. A summary table of our contingent liabilities as of March 31, 2024, as disclosed in the Restated Financial Information is set forth below:

(₹ in Lakhs)

Particulars	March 31, 2024 (Consolidated)	March 31, 2023 (Consolidated)	March 31, 2022 (Standalone)
Claims not acknowledged as Debts	2.32	2.32	2.32
Demad of Tax Deduction at Source of various Assessment Year agetating by the Company	8.70	1.40	1.35
<b>Total</b>	<b>11.02</b>	<b>3.72</b>	<b>3.67</b>

For details, see “**Restated Financial Information**” and “**Management’s Discussion and Analysis of Financial Condition and Results of Operations - Contingent Liabilities**” on pages 192 and 228 respectively, for more information. Any or all of these contingent liabilities may become actual liabilities. In the event that any of our contingent liabilities become non-contingent, our business, financial condition and results of operations may be adversely affected. Furthermore, there can be no assurance that we will not incur similar or increased levels of contingent liabilities in the current Financial Year or in the future

**38. Our Promoter, Key Managerial Personnel and Directors are interested in our Company in addition to their normal remuneration and reimbursement of expenses incurred.**

Our Promoters Mr. Nemi Chand Jain, Mrs. Sumitra Jain, Mr. Amit Kumar Jain and Mr. Sumit Jain are interested in our Company to the extent of Equity Shares held by them in our Company as well as to the extent of any dividends, bonuses, or other distributions on such Equity Shares.

Our Promoter and some of our Directors are also interested in contracts, transactions and agreements/arrangements entered into or to be entered into by our Company with any company which is promoted by them or in which they hold directorships or any partnership firm in which they are partners as declared in their respective capacity. While we believe that all such contracts, transactions and agreements/arrangements have been conducted on an arm’s length basis, we cannot assure you that we might have obtained more favourable terms had such transactions been entered into with unrelated parties.

Our Promoter, also being the Managing Director, and some other Directors and Key Managerial Personnel of our Company, are interested in our Company, in addition to their remuneration or benefits and reimbursement of expenses, to the extent of their shareholding in our Company. Our Promoter, Directors and KMPs shall abide by the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and protect the interests of the Company. However, in case of any conflict of interest our Promoter, Directors and KMPs shall keep the interests of our Company first over their personal interest, we cannot assure you that they will exercise their rights as shareholders to the benefit and best interest of our Company. Our Promoter, Directors and KMPs may take or block actions with respect to our business which may conflict with the best interests of our Company or that of minority shareholders.

Further, our Directors and Key Management Personnel may be regarded as interested to the extent of, among other things, remuneration, sitting fees and perquisites for which they may be entitled to as part of their services rendered to us in the capacity of director of our Company. For further details on the interest of our Promoter, Directors, and Key Management Personnel, other than reimbursement of expenses incurred or normal remuneration or benefits, see “Our Business”, “Our Management”, “Our Promoter and Promoter Group” and “Restated Financial Information – Note 36 – Related party disclosure” on pages 135 and 164, 182, 192 respectively.

**39. We have allotted 8,04,000 equity shares within the last twelve months, which may be at a price below the Issue Price.**

Our company has undertaken a private placement issue of 8,04,000 equity shares having face value of ₹ 10/- each at an issue price of ₹ 75/- per equity shares within the last twelve months from date of filing the Draft Red Herring Prospectus to certain Non-Promoters. Since the Issue price of this Initial Public Offering has not been determined yet, there is no guarantee that the company may issue equity share at price higher than the price on which shares are issued in last twelve months i.e ₹ 75/- per equity shares.

**40. Our management will deploy net proceeds pending utilization for objects to issue in scheduled commercial banks and there is no assurance that the objects of the Issue will be achieved within the time frame expected or at all, or that the deployment of the Net Proceeds in the manner intended by us will result in any increase in the value of your investment. Any variation in the utilisation of the Net Proceeds or in the terms as disclosed in the Draft Red Herring Prospectus would be subject to certain compliance requirements, including prior shareholders’ approval.**


We intend to use the Net Proceeds for (i) Investment in our Wholly Owned Subsidiary, Shri Ahimsa Healthcare Private Limited for setting up a manufacturing unit (“**Proposed Project**”); and (ii) general corporate purposes. The deployment of the Net Proceeds is based on management estimates, current circumstances of our business and prevailing market conditions and has not been appraised by any bank, financial institution or other independent institution. We may have to revise our funding requirements and deployment from time to time due to various factors, such as changes in costs, financial and market conditions, business and strategy considerations and interest and exchange rate fluctuations or other external factors, which may or may not be within the control of our management. This may entail rescheduling and revising planned expenditure and funding requirements and increasing or decreasing expenditures for a particular purpose from planned expenditures at the discretion of our management and subject to applicable law. Our Company has not appointed any monitoring agency for this Offer. However, pursuant to Regulation 32(3) of the SEBI LODR Regulations, 2015, our Company shall on a half yearly basis disclose to the Audit Committee the uses and application of the Net Proceeds. Accordingly, investors in Equity Shares will be relying on the judgment of our management regarding the application of the Net Proceeds. The application of Net Proceeds in our business may not lead to an increase in the value of your investment.

In accordance with Section 27 of the Companies Act, 2013, we cannot undertake any variation in the utilization of the Net Proceeds or in the terms of any contract as disclosed in this Draft Red Herring Prospectus without obtaining the Shareholders’ approval through a special resolution. In the event of any such circumstances that require us to undertake variation in the disclosed utilization of the Net Proceeds, we may not be able to obtain the Shareholders’ approval in a timely manner, or at all. Any delay or inability in obtaining such Shareholders’ approval may adversely affect our business or operations.

Further, our Promoters would be required to provide an exit opportunity to the shareholders who do not agree with our proposal to change the objects of the Issue or vary the terms of such contracts, at a price and manner as prescribed by SEBI. Additionally, the requirement on Promoters to provide an exit opportunity to such dissenting shareholders may deter the Promoters from agreeing to the variation of the proposed utilization of the Net Proceeds, even if such variation is in our interest. This may restrict our ability to respond to any change in our business or financial condition by re-deploying the unutilized portion of the Net Proceeds, if any, or varying the terms of any contract, which may adversely affect our business and results of operations.

Various risks and uncertainties, including those set forth in this section “**Risk Factors**”, may limit or delay our efforts to use the Net Proceeds to achieve profitable growth in our business. For details see, “**Objects of the Issue**” on page 96.

**41. We may not be able to protect our trademarks from infringement.**

We have not registered our “” brand name and logo as registered trademarks in India. Although we take steps to monitor the possible infringement or misuse of our trademarks, it is possible that third parties may infringe, dilute or otherwise violate our trademark rights. Any unauthorized use of our trademarks could harm our reputation or commercial interests. In addition, our enforcement against third-party infringers or violators may be unduly expensive and time-consuming, and any remedy obtained may constitute insufficient redress relative to the damages we may suffer. For details, see chapter titled “**Government and Other Approvals**” on page 248.

**42. Relevant copies of educational qualifications of some of our Directors and Promoters are not traceable.**

Relevant copies of the educational qualifications of some of our Directors and Promoters, namely Mrs. Sumitra Jain, Mr. Nemi Chand Jain are not traceable. We possess Provisional Passing Certificate of Mr. Nemi Chand Jain for his Master's in Management Studies, issued by the Birla Institute of Technology and Science, Pilani, Rajasthan. However, we do not possess a copy of the Educational Qualification Certificate for Ms. Sumitra Jain. Consequently, we or the Book Running Lead Manager cannot assure you that such information in relation to the particular Directors or Promoters are true and correct and you should not place undue reliance on the experience and qualification of our management included in this Draft Red Herring Prospectus.

**43. Relevant copy of Domain Registration Certificate of the Company is not available / traceable.**

Relevant copies of the Domain Registration Certificate of the Company, is not available / traceable. The Company has registered its domain names, 'https://www.shriahimsa.com' (valid until April 2028) and 'https://www.naturalcaffeine.co.in/' (valid until June 2029), through private service providers offering domain registration services, specifically NowFloats Technologies Pvt. Ltd. and Papaok.com, respectively. Upon requesting formal registration certificates from these providers, we were informed that they do not issue such documents. Since, in India, there is no designated authority responsible for issuing domain registration certificates, consequently, we have relied on the registration invoice/bill for the domain name to be regarded as sufficient proof of ownership and usage in order to comply with the disclosure requirements in section "Approvals obtained by our Company in relation to our Business and Operations", with respect Domain Registration, under the chapter titled "Government and other Statutory Approvals" on beginning page 279 of this Draft Red Herring Prospectus.

**44. If we are subject to any frauds, theft, or embezzlement by our employees, suppliers or customers, it could adversely affect our reputation, results of operations, financial condition and cash flows.**

Our operations may be subject to incidents of theft. We may also encounter some inventory loss on account of employees/ supplier/ customer fraud, theft, or embezzlement. Although we have set up various security measures in our units such as deployment of security guards and operational processes such as periodic stock taking, there can be no assurance that we will not experience any fraud, theft, employee negligence, loss in transit or similar incidents in the future, which could adversely affect our reputation, results of operations, financial condition and cash flows.

Although there has been no such instance in the past, in case if any loss being incurred due to theft, fire, breakage or damage caused by other casualties, there can be no assurance that we will be able to recover from our insurers the full amount of any such loss in a timely manner, or at all. If we incur a significant inventory loss due to third- party or employee theft and if such loss exceeds the limits of, or is subject to an exclusion from, coverage under our insurance policies, it could have an adverse effect on our business, results of operations and financial condition. In addition, if we file claims under an insurance policy it could lead to increases in the insurance premiums payable by us or the termination of coverage under the relevant policy.

**45. Our insurance may be insufficient to cover all losses associated with our business operations.**

Our insurance policies currently cover our inventories at manufacturing facility, secure rooms, transit, theft and while being handled by our employees, including with respect to fire, burglary, special perils and vehicles. Notwithstanding the insurance coverage that we carry, we may not be fully insured against abnormal business risks. There are many events that could significantly impact our operations, or expose us to third-party liabilities, for which we may not be adequately insured. For instance, there was an incident of fire within the factory premises on January 17, 2024, at approximately 2:00 p.m. The exact cause of the fire remains undetermined. However, the fire department was promptly notified, and the situation was brought under control without any casualties. There was no financial loss incurred as the damages were fully covered under the existing insurance policy. There can be no assurance that any claim under the insurance policies maintained by us will be honored fully, in part, or on time. To the extent that we suffer any loss or damage that is not covered by insurance or exceeds our insurance coverage, our business, financial condition and results of operations could be adversely affected. We shall endeavour to maintain adequate insurance coverage to safeguard against any such future incidents. For details, see chapter titled "Our Business" on page 135.

**46. We may be subject to unionization, work stoppages or increased labour costs, which could adversely affect our business and results of operations.**

Our industry is labour intensive. India has stringent labour legislation that protects the interests of workers, including legislation that sets forth detailed procedures for the establishment of unions, dispute resolution and employee removal and legislation that imposes certain financial obligations on employers upon retrenchment. The success of our operations depends



on availability of labour and maintaining a good relationship with our workforce. As of date of DRHP, we employed about 80 employees. Our labour force is not unionized. However, in the event that employees seek to unionize, it may become difficult for us to maintain flexible labour policies, which may increase our costs and adversely affect our business. A potential increase in the salary scale of our employees because of organization or unrest, or a disruption in services from our employees due to potential strikes, could adversely affect our business operations and financial condition. In the past three years, we have not experienced any labour dispute. We do not have any formal policy for redressal of labour disputes. Although we have not experienced any major interruption to our operations as a result of labour disputes in the recent past, there can be no assurance that we will not experience any such disruption in the future as a result of disputes or disagreements with our work force, which may adversely affect our ability to continue our business operations. We may also have to incur additional expense to train and retain skilled labour. We are also subject to a number of stringent labour laws that protect the interests of workers, including legislation that imposes financial obligations on employers upon retrenchment. There can be no assurance that we will not experience labour unrest in the future, which may delay or disrupt our operations. Any labour unrest including labour disputes, strikes and lockouts, industrial accidents, experienced by us could directly or indirectly prevent or hinder our normal operating activities and, if not resolved in a timely manner, could lead to disruptions in our operations. In the event of any prolonged delay or disruption of our business, results of operations and financial condition could be materially and adversely affected.

***47. If we fail to maintain an effective system of internal controls, we may not be able to successfully manage, or accurately report, our financial risks.***

Effective internal controls are necessary for us to prepare reliable financial reports and effectively avoid fraud. Moreover, any internal controls that we may implement, or our level of compliance with such controls, may deteriorate over time, due to evolving business conditions.

We are responsible for establishing and maintaining adequate internal control measures commensurate with the size and complexity of our operations. As we are exposed to operational risks arising from the potential inadequacy or failure of internal processes or systems, and our actions may not be sufficient to ensure effective internal checks and balances in all circumstances. We take reasonable steps to maintain appropriate procedures for compliance and disclosure and to maintain effective internal controls over our financial reporting. As risks evolve and develop, internal controls must be reviewed on an ongoing basis. Maintaining such internal controls requires human involvement and is therefore subject to lapses in judgment and failures that result from human error. For instance, there was an inadvertent delay in filing of GSTR-3B returns in the past, due to oversight of accounts team however the Company later duly filed the same and also undertook necessary corrective measures, including reconstitution of the accounts team, to ensure timely filing of returns.

Notwithstanding, we are dedicated to the ongoing enhancement of our policies and procedures to ensure compliance and maintain robust internal controls over financial reporting, thereby ensuring the production of reliable financial statements. We shall continue to establish and uphold adequate internal measures proportionate to the size and complexity of our operations, on a continual basis.

There can be no assurance that deficiencies in our internal controls will not arise in the future, or that we will be able to implement, and continue to maintain, adequate measures to rectify or mitigate any such deficiencies in our internal controls. Any inability on our part to adequately detect, rectify or mitigate any such deficiencies in our internal controls may adversely impact our ability to accurately report, or successfully manage, our financial risks, and to avoid fraud.

***48. We have not entered into any formal arrangement for technical support service for maintenance and smooth functioning of our equipment's and machineries, which may affect our performance.***

Our manufacturing processes involve daily use of technical equipment's and machineries. They require periodic maintenance checks and technical support in an event of technical breakdown or malfunctioning. Our Company has not entered into any formal technical support service agreements with a competent third-party vendor. However, Company has an in-house team for maintenance and advancement of machinery. Our failure to reduce the downtime in as such events occur may adversely affect our productivity, business and results of operations.

***49. All of our directors do not have any prior experience of being a director in any other listed company in India.***

Our current Board comprises of Eight (8) Directors which includes Chairman and Managing Director, Two (2) Whole-Time Directors, Four (4) Non-Executive Independent Directors and One (1) Non-Executive Non-Independent Director. Except for Shri Om Prakash Bansal (Independent Director) none of our Board of Directors have any prior experience of being a Director in any other listed company in India. While our Board members have relevant experience in their respective field, not having any prior experience as being a director in any other listed company in India may present some potential challenges to our Company in effectively meeting with good corporate governance norms and practices. Additionally, having lack of such

experience amongst the board of directors may impact our Company's credibility and reputation among the investors and other stakeholders. For further details, please see chapter titled "***Our Management***" on page no. 164.

***50. The inability to protect, strengthen and enhance our existing reputation could adversely affect our business prospects and financial performance.***

Our business reputation is critical to the success of our business. While we have been making consistent efforts to strengthen our image, various factors, some of which are beyond our control, are critical for maintaining and enhancing our reputation and if not managed properly, may negatively affect our brand and reputation. These include our ability to effectively manage the quality of our products, increase brand awareness among existing and potential customers, adapt our advertising and promotion efforts to emerging industry standards and protect the intellectual property related to our brand.

Our success in marketing our existing and new products depends on our ability to adapt to a rapidly changing marketing and media environment, including our increasing reliance on direct promotional initiatives. There can be no assurance that our marketing efforts will be successful in maintaining our reputation and its perception with customers and/ or result in increased sales in the future. Also, we may not necessarily increase or maintain our sales promotion spending in proportion to our growth in the future, which may result in limited marketing initiatives. Our inability to adapt to evolving marketing trends at the same pace as our competitors may adversely affect our ability to effectively compete in terms of our image value.

Our reputation could also be negatively impacted if we fail to maintain our established standards of service, or if our products fail to meet the expectation of our customers. Any allegations of deterioration in product quality even when false or unfounded, could tarnish our image and may cause our customers to choose other competing products. Any negative publicity regarding us, our reputation, our products or the stones industry generally could adversely affect our business and our results of operations. Other risks associated with our industry include improper disclosure of proprietary information, negative comments about our brands or standard of service, exposure of personally identifiable information, fraud, hoaxes or malicious exposure of false information. The inappropriate use of social media by our customers, employees, suppliers or other third parties could also harm our reputation thereby increasing our costs, lead to litigation or result in negative publicity that could damage our reputation and adversely affect our business, results of operations and financial condition. In addition, counterfeit products, product defects and ineffective promotional activities are all potential threats to the image and potency of our brand. Our failure to develop, maintain and enhance our brand may result in decreased revenue and loss of customers and in turn adversely affect our reputation, business, financial condition, results of operations and cash flows.

***51. Our ability to pay dividends in the future will depend upon future earnings, financial condition, cash flows, working capital requirements and capital expenditures***

Our ability to pay dividends in the future will depend upon future earnings, financial condition, cash flows, working capital requirements and capital expenditures and are also prohibited by the terms of our financing arrangements. Our Company has not paid any dividends in the past. The amount of our future dividend payments, if any, will depend upon factors that our Board of Directors deems relevant, including among others, our results of future earnings, financial condition, cash flows, working capital requirements, capital expenditures, applicable Indian legal restrictions and other factors. There can be no assurance that our Company will be able to pay dividends. For further details, please see '***Dividend Policy***' on page no 191 of the Draft Red Herring Prospectus.

## GENERAL INFORMATION

Under the heading “*Changes in Auditors*” in the chapter “GENERAL INFORMATION” beginning on page 56 of the Draft red herring Prospectus shall be updated to reflect as under:

### Changes in Auditors

Except as disclosed below, there has been no change in Auditors during the last three years:

Date of Resignation/ Cessation	From	Date of appointment	To	Reason for Change
September 30, 2024	M/s. Jain Vinod & Co	September 30, 2024	M/s. Ummmed Jain & Co	Appointed to comply with the provisions of Section 139 (2) Companies Act, 2013

## CAPITAL STRUCTURE

Under the heading “Details of shareholding of our Promoters and members of the Promoter Group in our Company” in the chapter “CAPITAL STRUCTURE” beginning on page 66 of the Draft red herring Prospectus shall be updated to reflect as under.

### Details of shareholding of our Promoters and members of the Promoter Group in our Company

#### (a) Equity shareholding of our Promoters and Promoter Group

As on the date of this Draft Red Herring Prospectus, our Promoters and Promoter Group hold 1,80,22,550 Equity Shares equivalent to 94.22% of the pre-Offer issued, subscribed and paid-up Equity Share capital of our Company, on a fully diluted basis.

Sr. No.	Name of the Shareholder	Pre-Offer Equity Share capital		Post-Offer Equity Share capital	
		No. of Equity Shares	% of paid-up Equity Share Capital*	No. of Equity Shares	% of paid-up Equity Share Capital*
<b>Promoters &amp; Promoter Selling Shareholders</b>					
1.	Mr. Nemi Chand Jain	74,05,300	38.72	[●]	[●]
2.	Mrs. Sumitra Jain	26,04,000	13.61	[●]	[●]
<b>Sub-total (A)</b>		<b>1,00,09,300</b>	<b>52.33</b>	[●]	[●]
<b>Promoters</b>					
1.	Mr. Amit Kumar Jain	39,02,500	20.40	[●]	[●]
2.	Mr. Sumit Jain	4,37,500	2.29	[●]	[●]
3.	Mrs. Prerna Jain	5,68,750	2.97	[●]	[●]
4.	M/s Ahimsa Holdings Private Limited	15,47,000	8.09	[●]	[●]
5.	M/s Bimneer Investments Private Limited	12,26,750	6.41	[●]	[●]
<b>Sub-total (B)</b>		<b>76,82,500</b>	<b>40.16</b>	[●]	[●]
<b>Promoter Group</b>					
1.	Mr. Deepak Sogani	3,30,750	1.73	[●]	[●]
<b>Sub-total (C)</b>		<b>3,30,750</b>	<b>1.73</b>	[●]	[●]
<b>Total (A + B + C)</b>		<b>1,80,22,550</b>	<b>94.22</b>	[●]	[●]

\*Rounded off to the closest decimal

All Equity Shares held by our Promoters and Promoter Group are in dematerialised form as on the date of this Draft Red Herring Prospectus.

#### (b) Build-up of shareholding of our Promoters

Set forth below are the details of the build-up of our Promoters’ shareholding in our Company since incorporation:

Date of allotment/ acquisition/ transfer	Number of Equity Shares allotted/ transferred	Face value per Equity Share (₹)	Issue Price/Consideration per Equity Share (₹)	Nature of consideration	Nature of allotment/ transfer	Cumulative number of Equity Shares	% of Pre-Offer capital *	% of Post-Offer capital
<b>Mr. Nemi Chand Jain</b>								
October 17, 1990	100	100	100	Cash	Subscription to MOA	300	0.00	[●]
April 01, 1994	3,740	100	100	Cash	Preferential Allotment	4,040	0.05	[●]
March 31, 1995	13260	100	100	Cash	Preferential Allotment	17,100	0.23	[●]
May 12, 1995	Pursuant to shareholders’ resolution dated May 12, 1995, each Equity Share of our Company of face value of ₹100 each were sub-divided into 10 Equity Shares of face value of ₹10 each. Therefore the offered, paid-up and subscribed share capital of our Company was sub-divided from ₹ 40,00,000 divided into 40,000 Equity Shares of ₹100 each into ₹40,00,000 divided into 4,00,000 Equity Shares of ₹10 each							
April 15, 1997	3,25,000	10	10	Cash	Preferential	4,96,000	6.70	[●]

					Allotment			
#	22,000	10	10 <sup>#</sup>	Cash	Acquisitions by way of Transfer <sup>(1)</sup>	5,18,000	6.99	[●]
March 27, 2010	7,00,000	10	10	Cash	Preferential Allotment	12,18,000	16.45	[●]
August 30, 2018	3,29,300	10	30	Cash	Acquisitions by way of Transfer <sup>(2)</sup>	15,47,300	8.09	[●]
September 30, 2020	2,76,000	10	29	Other than Cash	Conversion of Preference Shares	18,23,300	9.53	[●]
February 16, 2021	2,500	10	30	Cash	Acquisitions by way of Transfer <sup>(3)</sup>	18,25,800	9.55	[●]
February 18, 2021	2,500	10	30	Cash	Acquisitions by way of Transfer <sup>(4)</sup>	18,28,300	9.56	[●]
March 31, 2021	2,500	10	30	Cash	Acquisitions by way of Transfer <sup>(5)</sup>	18,30,800	9.57	[●]
August 27, 2021	2,500	10	30	Cash	Acquisitions by way of Transfer <sup>(6)</sup>	18,33,300	9.59	[●]
October 1, 2021	5,000	10	30	Cash	Acquisitions by way of Transfer <sup>(7)</sup>	18,38,300	9.61	[●]
November 25, 2021	2,500	10	30	Cash	Acquisitions by way of Transfer <sup>(8)</sup>	18,40,800	9.62	[●]
March 29, 2022	2,50,000	10	32	Other than Cash	Conversion of Loan	20,90,800	10.93	[●]
April 25, 2022	2,500	10	30	Cash	Acquisitions by way of Transfer <sup>(9)</sup>	20,93,300	10.94	[●]
July 8, 2022	2,500	10	30	Cash	Acquisitions by way of Transfer <sup>(10)</sup>	20,95,800	10.96	[●]
March 28, 2023	2,500	10	30	Cash	Acquisitions by way of Transfer <sup>(11)</sup>	20,98,300	10.97	[●]
April 17, 2023	5,000	10	30	Cash	Acquisitions by way of Transfer <sup>(12)</sup>	21,03,300	11.00	[●]
April 19, 2023	2,500	10	30	Cash	Acquisitions by way of Transfer <sup>(13)</sup>	21,05,800	11.01	[●]
January 12, 2024	5,000	10	30	Cash	Acquisitions by way of Transfer <sup>(14)</sup>	21,10,800	11.04	[●]
March 23, 2024	52,77,000	10	Nil	Other than Cash	Bonus offer in the ratio of five (5) Equity Shares for every two (2) Equity Shares held	73,87,800	38.63	[●]
May 18, 2024	2,500	10	40	Cash	Acquisitions by way of	73,90,300	38.64	[●]

					Transfer <sup>(15)</sup>			
May 28, 2024	2,500	10	40	Cash	Acquisitions by way of Transfer <sup>(16)</sup>	73,92,800	38.65	[●]
August 9, 2024	12,500	10	Nil	Other than Cash	Transfer of Bonus Shares from escrow suspense account, resultant to the acquisition by way of transfer dated May 18, 2024 & May 28, 2024 <sup>^</sup>	74,05,300	38.72	[●]
<b>Sub-total (A)</b>						<b>74,05,300</b>	<b>38.72</b>	<b>[●]</b>
<b>Mr. Amit Kumar Jain</b>								
March 29, 2018	3,25,000	10	15.5	Cash	Preferential Allotment	3,25,000	1.70	[●]
September 30, 2020	4,22,000	10	29	Cash	Conversion of unsecured loan	7,47,000	3.91	[●]
September 30, 2020	1,38,000	10	29	Cash	Conversion of Preference Shares	8,85,000	4.63	[●]
March 29, 2022	2,30,000	10	32	Cash	Conversion of unsecured loan	11,15,000	5.83	[●]
March 23, 2024	27,87,500	10	Nil	Other than Cash	Bonus offer in the ratio of five (5) Equity Shares for every two (2) Equity Shares held	39,02,500	20.40	[●]
<b>Sub-total (B)</b>						<b>39,02,500</b>	<b>20.40</b>	<b>[●]</b>
<b>Mrs. Sumitra Jain</b>								
July 10, 1995	10,000	10	10	Cash	Preferential Allotment	10,000	0.05	[●]
March 27, 2010	3,00,000	10	10	Cash	Preferential Allotment	3,10,000	1.62	[●]
September 30, 2020	3,14,000	10	29	Other than Cash	Conversion of unsecured loan	6,24,000	3.26	[●]
March 29, 2022	1,20,000	10	32	Other than Cash	Conversion of unsecured loan	7,44,000	3.89	[●]
March 23, 2024	18,60,000	10	Nil	Other than Cash	Bonus offer in the ratio of five (5) Equity Shares for every two (2) Equity Shares held	26,04,000	13.61	[●]
<b>Sub-total (C)</b>						<b>26,04,000</b>	<b>13.61</b>	<b>[●]</b>
<b>Mr. Sumit Jain</b>								
December 22, 2023	1,25,000	10	40	Cash	Transfer of Equity Shares from Narendra Kumar Jain	1,25,000	0.65	[●]
March 23, 2024	3,12,500	10	Nil	Other than Cash	Bonus offer in the ratio of five	4,37,500	2.29	[●]

					(5) Equity Shares for every two (2) Equity Shares held			
<b>Sub-total (D)</b>						<b>4,37,500</b>	<b>2.29</b>	
<b>Mrs. Purna Jain</b>								
February 16, 2023	37,500	10	40	Cash	Transfer of Equity Shares from Sandhya Devi Jain	37,500	0.19	[●]
December 28, 2023	1,25,000	10	40	Cash	Transfer of Equity Shares from Narendra Kumar Jain	1,62,500	0.84	[●]
March 23, 2024	4,06,250	10	Nil	Other than Cash	Bonus offer in the ratio of five (5) Equity Shares for every two (2) Equity Shares held	5,68,750	2.97	[●]
<b>Sub-total (E)</b>						<b>5,68,750</b>	<b>2.97</b>	
<b>M/s Ahimsa Holdings Private Limited</b>								
March 31, 1995	900	100	100	Cash	Preferential Allotment	900	0.00	[●]
May 12, 1995	Pursuant to shareholders' resolution dated May 12, 1995, each Equity Share of our Company of face value of ₹100 each were sub-divided into 10 Equity Shares of face value of ₹10 each. Therefore the offered, paid-up and subscribed share capital of our Company was sub-divided from ₹ 40,00,000 divided into 40,000 Equity Shares of ₹100 each into ₹40,00,000 divided into 4,00,000 Equity Shares of ₹10 each							
#	1,28,000	10 <sup>#</sup>	Nil	Cash	Transfer of Equity Shares from Ahimsa Chemicals Private Limited	1,37,000	0.72	[●]
February 16, 2004	3,05,000	10	10	Cash	Preferential Allotment	4,42,000	2.31	[●]
March 23, 2024	11,05,000	10	Nil	Other than Cash	Bonus offer in the ratio of five (5) Equity Shares for every two (2) Equity Shares held	15,47,000	8.09	[●]
<b>Sub-total (F)</b>						<b>15,47,000</b>	<b>8.09</b>	[●]
<b>M/s Binneer Investments Private Limited</b>								
March 31, 1995	600	100	100	Cash	Preferential Allotment	900	0.00	[●]
May 12, 1995	Pursuant to shareholders' resolution dated May 12, 1995, each Equity Share of our Company of face value of ₹100 each were sub-divided into 10 Equity Shares of face value of ₹10 each. Therefore the offered, paid-up and subscribed share capital of our Company was sub-divided from ₹ 40,00,000 divided into 40,000 Equity Shares of ₹100 each into ₹40,00,000 divided into 4,00,000 Equity Shares of ₹10 each							
February 16, 2004	62,500	10	10	Cash	Preferential Allotment	68,500	0.36	[●]
February 7, 2009	2,82,000	10	10	Cash	Preferential Allotment	3,50,500	1.83	[●]

March 23, 2024	8,76,250	10	Nil	Other than Cash	Bonus offer in the ratio of five (5) Equity Shares for every two (2) Equity Shares held	12,26,750	6.41	[•]
<b>Sub-total (G)</b>						<b>12,26,750</b>	<b>6.41</b>	<b>[•]</b>
<b>Total (A + B + C+ D + E+F+G)</b>						<b>1,76,91,800</b>	<b>92.49</b>	<b>[•]</b>

*\*The figures in the row have been rounded-off to the closest decimal.*

*# The share transfer deeds are not traceable and the consideration is taken from certificate issued by the Ms/. Jain Vinod & Co, Statutory Auditor, by certificate dated August 30, 2024 bearing UDIN: 24073827BKGTMU7366*

*^ Bonus Shares declared by the Company on March 23, 2024, towards original holdings of Mr.Binay Kumar Gangwal. & Jagabandhu Daw,(collectively termed as "Transferors") kept in escrow suspense account of the Company, were duly transferred to the demat account of Mr. Nemi Chand Jain on August 09, 2024 pursuant to communication by the Transferors.*



## OBJECTS OF THE OFFER

- I. Under the heading “Means of finance for Proposed Project” in the chapter “OBJECT OF THE OFFER” beginning on page 97 of the Draft red herring Prospectus shall be updated to reflect as under.

### Means of finance for Proposed Project

The total estimated cost for setting up of the Proposed Project is approximately ₹6,068 Lakhs. We intend to fund the estimated cost of setting up the Proposed Project as follows:

(₹ in Lakh)

Particulars	Amount
Total Estimated Project Cost (A)	6068 <sup>(1)</sup>
(Less) Amount deployed as of March 31, 2024 (B)	450 <sup>(2)</sup>
Balance amount to be incurred (C) =(A)-(B)	5,618
Amount to be funded by infusion out of net IPO proceeds (D)	3,500
Amount to be funded from Internal Accruals of Holding Company (E)	2,118*
Funding required excluding the Net Proceeds (F) = (C - (D+E))	-
Stated means of finance excluding the Net Proceeds - 75% of (F)	NA
Debt facility (G)	NA
Equity funding (H)	NA
Total amount tied up (G+H)	NA

<sup>(1)</sup> Total estimated cost, as per Detailed Project Report (“DPR”) dated August 23, 2024 prepared and issued by M/s Lodha Jain & Company, Independent Chartered Accountants and verified by M/s Jain Vinod & Co. Statutory Auditor, in respect of the Proposed Project, by way of their certificate dated August 30, 2024 bearing UDIN:24073827BKGTTNN5442.

<sup>(2)</sup> As of March 31, 2024, the amount deployed towards the proposed project was ₹450 Lakhs, as certified by our statutory and M/s. Jain Vinod & Co., Statutory Auditor, by way of their certificate dated August 30, 2024 bearing UDIN: 24073827BKGTTNN5442.

\*As per the undertaking by the Company, firm arrangements of finance through verifiable means towards seventy-five per cent. of the stated means of finance for the proposed project be funded from issue proceeds, excluding the amount to be raised through the proposed issue or through existing identifiable internal accruals.

- II. Under the heading “Estimated Cost and Utilisation of Net Proceeds” in the chapter “CAPITAL STRUCTURE” beginning on page 98 of the Draft red herring Prospectus shall be updated to reflect as under.

### Estimated Cost and Utilisation of Net Proceeds

The total estimated cost of the “Proposed Project” is ₹ 6,068 Lakhs out of which our Company proposes to utilise ₹ 3,500 Lakhs from the Net Proceeds for the capital expenditure requirements for setting up the “Proposed Project”, as per the DPR dated August 23, 2024 prepared and issued by M/s Lodha Jain & Company, Independent Chartered Accountants and verified by M/s Jain Vinod & Co. Chartered Accountants. The fund requirements, the deployment of funds and the intended use of the Net Proceeds for the Proposed Project as described herein are based on our current business plan of the company, management estimates, current and valid quotations from suppliers and / or purchase orders issued to suppliers/vendors, architect estimates, prevailing market conditions and other commercial and technical factors which are subject to change.

However, such total estimated cost and related fund requirements have not been appraised by any bank or financial institution.

The total estimated year-wise fund deployment schedule is as follows:

(₹ in Lakh)

Particulars	Estimated Cost	Amount deployed as on 31.03.2024 (Actual)*	Amount proposed to be funded from the net proceeds			
			Estimated Deployment Apr 24 to Sep 24	Estimated Deployment Oct 24 to Mar 25	Estimated Deployment (Fiscal 2025-26)	Total
<b>Application of Funds</b>						
Land & Site Development	300.00	286.84	13.16	0.00	0.00	300.00
Building & Civil Construction (incl. advance)*	1311.00	143.00	100.00	900.00	168.00	1311.00

Plant & Machinery (incl. Adv.)	3830.00	5.25	100.00	2000.00	1724.75	3830.00
Preliminary Expenses	12.54	12.54	0.00	0.00	0.00	12.54
Preoperative Expenses	5.46	2.04	0.84	0.00	2.58	5.46
Provision for Contingencies	109.00	0.00	0.00	0.00	109.00	109.00
Working Capital Margin	500.00	0.33	0.00	0.00	499.67	500.00
<b>Total</b>	<b>6068.00</b>	<b>450.00</b>	<b>214.00</b>	<b>2900.00</b>	<b>2504.00</b>	<b>6068.00</b>
<b>Sources of Funds</b>						
Equity Share Capital	450.00	450.00	0.00	0.00	0.00	450.00
Investment by Holding Company through Redeemable Preference Shares out of IPO Proceeds						
- For Building & Civil Constr.	900.00	0.00	0.00	900.00	0.00	900.00
- For Plant & Machinery	2600.00	0.00	0.00	2000.00	600.00	2600.00
<b>Total IPO Proceeds(A)</b>	<b>3500.00</b>	<b>0.00</b>	<b>0.00</b>	<b>2900.00</b>	<b>600.00</b>	<b>3500.00</b>
Investment by holding Company out of Internal Accruals through Unsecured Loan/ Debt / Debentures.(B)	2118.00	0.00	214.00	0.00	1904.00	2118.00
<b>Total(A+B)</b>	<b>6068.00</b>	<b>450.00</b>	<b>214.00</b>	<b>2900.00</b>	<b>2504.00</b>	<b>6068.00</b>

**Notes:**

- Amount deployed as on March 31, 2024 derived from Audited Financial Statements of the Company for FY 2023-24 dated June 10, 2024
- Apart from the above assets, ₹201.08 Lakhs has been paid for acquisition of a land in Dudu for investment purpose and ₹327.76 Lakhs has been incurred towards excess land in Sawards for future expansion. The said land does not form part of the project hence not included in above table, however disclosed as Investments under Balance Sheet in the Detailed Project Report.
- Equity Share Capital of ₹980 Lakhs has already been raised and inducted in the company, which has been majorly invested in land acquisition. Out of the total capital, ₹ 450 Lakhs has been invested in the proposed project whereas ₹530 Lakhs has been invested in land for future expansion / investment purpose, hence does not form part of the means of finance.
- The year-wise estimated deployment of funds in coming years has been taken as per the estimates of the management, architect & technical team of the company.
- The estimated cost to be incurred is inclusive of GST.

<sup>(1)</sup> Total estimated cost, as per Detailed Project Report (“DPR”) dated August 23, 2024 prepared and offered by M/s Lodha Jain & Company, Independent Chartered Accountants and verified by M/s Jain Vinod & Co. Chartered Accountants in respect of the Proposed Project by way of their certificate dated August 30, 2024, bearing UDIN: 24073827BKGTKN5474. For sources of funds for the amounts deployed, please see- “Means of Finance” below.

We have placed orders and paid advance with two of our suppliers for the plant and machineries required for the proposed project on the basis of procured quotations from vendors. At the time of placement of orders, advance payments need to be made to the suppliers which shall aggregate to approx. ₹607 Lakhs worked out on the basis of the quotations received from the vendors. Further, we will be placing the orders as per the schedule. For further details see “Risk Factors” on page 26.

**III. Under the heading “Break-up of the estimated costs – III. Plant and Machinery” in the chapter “OBJECT OF THE OFFER” beginning on page 100 of the Draft red herring Prospectus shall be updated to reflect as under.**

**III. Plant and Machinery**

The equipment required for the project includes Caffeine Powder Plant, Ethyl Acetate Plant, Wax Plant, Sludge Plant, Methyl Chloride Plant, Cooling Tower, Boiler, DG Sets, Effluent Treatment Plant, Water Treatment Plant etc. All required plant and machinery will be sourced from domestic suppliers; no imported equipment is required. Suppliers have been identified, and quotations have been secured. The selection process for the plant and machinery was conducted with due diligence, taking into account factors such as delivery timelines, supplier terms, pricing competitiveness, and historical performance. It is anticipated that the delivery of all equipment will be completed by January 2026, with installation and commissioning finalized by February 2026. The detailed break-down of these estimated costs is tabled below

S.No.	Particulars	No. of Machines	Rate	Basic Amount	GST	Total	Quotation Reference No.	Quotation Date	Valid till
<b>(A)</b>	<b>Caffeine Powder Plant</b>								
1	5 KL CHILLING REACTOR	2	18.00	36.00	6.48	42.48	EXCEL/JUNE/REA/444/2024	06-06-2024	03-12-2024
2	5 KL COOLING REACTOR	2	18.00	36.00	6.48	42.48	EXCEL/JUNE/REA/444/2024	06-06-2024	03-12-2024
3	5 KL CHILLING REACTOR	12	18.00	216.00	38.88	254.88	EXCEL/JUNE/REA/444/2024	06-06-2024	03-12-2024
4	5 KL MLT GROUND	10	7.00	70.00	12.60	82.60	EXCEL/JUNE/MLT/444/2024	06-06-2024	03-12-2024
5	5 KL SS316L REACTOR	4	18.00	72.00	12.96	84.96	EXCEL/JUNE/REA/444/2024	06-06-2024	03-12-2024
6	10 KL MLT TOP	4	10.00	40.00	7.20	47.20	EXCEL/JUNE/MLT/444/2024	06-06-2024	03-12-2024
7	20 KL STORAGE TANK	5	16.00	80.00	14.40	94.40	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
8	THE AUTOMATIC BOTTOM DISCHARGE CENTRIFUGE	10	55.00	550.00	99.00	649.00	EXCEL/JUNE/BDCM/444/2024	06-06-2024	03-12-2024
9	PRICE FOR SPIN FLASH DRYER INCL.	1	50.00	50.00	9.00	59.00	EXCEL/JUNE/SFD/444/2024	08-06-2024	05-12-2024
	PLANT ERECTION AND COMMISSIONING, CABLES, INSULATION, CLADDING								
10	TRIPLE EFFECT EVAPORATOR PLANT FOR CAFFEINE APPLICATION	1	175.00	175.00	31.50	206.50	EXCEL/JUNE/TFE/444/2024	06-06-2024	03-12-2024
<b>(B)</b>	<b>Ethyl Acetat Plant (EAP Plant)</b>								
11	1.5 KL SS316L STORAGE TANK	7	3.50	24.50	4.41	28.91	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
12	3 KL SS 316L CR	1	15.00	15.00	2.70	17.70	EXCEL/JUNE/CR/444/2024	06-06-2024	03-12-2024
13	4 KL SS316L STORAGE TANK	4	6.00	24.00	4.32	28.32	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
14	4 KL SS316L EXTRACTOR	3	18.00	54.00	9.72	63.72	EXCEL/JUNE/EXT/444/2024	06-06-2024	03-12-2024
15	5 KL SS316L STORAGE TANK	4	7.00	28.00	5.04	33.04	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
16	6 KL SS316L STORAGE TANK	3	7.50	22.50	4.05	26.55	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
17	6 KL SS316L VACCUM DISTILLATION	4	18.00	72.00	12.96	84.96	EXCEL/JUNE/VD/444/2024	06-06-2024	03-12-2024
18	20 KL SS316L STORAGE TANK	2	16.00	32.00	5.76	37.76	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
<b>(C)</b>	<b>Wax Plant</b>								
19	1 KL MLT GROUND SS316L	6	2.50	15.00	2.70	17.70	EXCEL/JUNE/MLT/444/2024	06-06-2024	03-12-2024
20	1 KL PRESSURE REACTOR	8	3.00	24.00	4.32	28.32	EXCEL/JUNE/PR/444/2024	06-06-2024	03-12-2024
<b>(D)</b>	<b>Sludge Plant</b>								
21	1 KL PRESSURE REACTOR	6	3.00	18.00	3.24	21.24	EXCEL/JUNE/REA/444/2024	06-06-2024	03-12-2024
22	2 KL MLT GROUND SS316L	6	1.50	9.00	1.62	10.62	EXCEL/JUNE/MLT/444/2024	06-06-2024	03-12-2024
23	48" BAG LIFTING CENTRIFUGE MACHINE	6	18.00	108.00	19.44	127.44	EXCEL/JUNE/CM/444/2024	06-06-2024	03-12-2024
<b>(E)</b>	<b>Methyl Chloride Plant (MCP Plant)</b>								
24	1 KL STORAGE TANK	1	3.00	3.00	0.54	3.54	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
25	2 KL STORAGE TANK	1	4.00	4.00	0.72	4.72	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
26	4 KL STORAGE TANK	2	6.00	12.00	2.16	14.16	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
27	5 KL SS316L REACTOR	3	18.00	54.00	9.72	63.72	EXCEL/JUNE/REA/444/2024	06-06-2024	03-12-2024
28	5 KL SS316L STORAGE TANK	5	7.00	35.00	6.30	41.30	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
29	6 KL SS316L DISTILLATION	7	18.00	126.00	22.68	148.68	EXCEL/JUNE/DST/444/2024	06-06-2024	03-12-2024
30	6 KL SS316L EXTRACTOR	3	18.00	54.00	9.72	63.72	EXCEL/JUNE/EXT/444/2024	06-06-2024	03-12-2024
31	6 KL SS316L VACCUM DISTILLATION	3	18.00	54.00	9.72	63.72	EXCEL/JUNE/VD/444/2024	06-06-2024	03-12-2024
32	10 M2 CONDENSER	10	1.80	18.00	3.24	21.24	EXCEL/JUNE/CON/444/2024	06-06-2024	03-12-2024
33	12 KL STORAGE TANK	8	12.00	96.00	17.28	113.28	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
34	20 KL STORAGE TANK	2	16.00	32.00	5.76	37.76	EXCEL/JUNE/ST/444/2024	06-06-2024	03-12-2024
35	30 M2 CONDENSER	7	4.00	28.00	5.04	33.04	EXCEL/JUNE/CON/444/2024	06-06-2024	03-12-2024
36	SPRAY DRYING PLANT 300 KGS/HR	1	165.00	165.00	29.70	194.70	EXCEL/JUNE/MD/444/2024-R00	06-06-2024	03-12-2024
	ERECTION & COMMISSIONING, CABLES, INSULATION AND CLADDING	1	9.90	9.90	1.78	11.68	EXCEL/JUNE/MD/444/2024-R00	06-06-2024	03-12-2024
<b>(F)</b>	<b>Cooling Tower</b>								
37	600 TR RECTANGULAR COOLING TOWER	1	7.65	7.65	1.38	9.03	SSC/Q-CT/2024-25	07-06-2024	Not mentioned
38	WATER COOLED SCREW CHILLERS 127 TR with VFD	2	31.90	63.80	11.48	75.28	MKTG/DL/SJ/24-25/SHRI	25-07-2024	24-01-2025
<b>(G)</b>	<b>Other Equipments</b>								
39	HYDRAULIC FILTER PRESS	4	1.82	7.28	1.31	8.59	Not mentioned	22-07-2024	21-01-2025
40	ROTARY SCREW AIR COMPRESSOR	1	18.04	18.04	3.25	21.29	DO-309337/	03-06-2024	09-02-2025
41	BOILER 4000 KG/HR, 24 KG/CM SQUARE	1	83.07	83.07	14.95	98.02	TD240605-27777	05-06-2024	04-12-2024
42	BOILER 6000 KG/HR, 24 KG/CM SQUARE	1	119.84	119.84	21.57	141.41	TD240605-27783	20-07-2024	19-01-2025

43	PIPING DESIGN - STEAM CONDENSATE CIRCUIT	1	5.50	5.50	0.99	6.49	PO SAMML/03	21-02-2024	Not mentioned
44	TWIN TOWER NITROGEN GENERATION PLANT	1	6.92	6.92	1.25	8.17	SHPL/EL/N/183	03-06-2024	Not mentioned
	FEED AIR COMPRESSOR	1	3.27	3.27	0.59	3.86	SHPL/EL/N/183	03-06-2024	Not mentioned
	REFRIGERANT AIR DRYER	1	0.40	0.40	0.07	0.47	SHPL/EL/N/183	03-06-2024	Not mentioned
	AIR FILTERS (PRE, POST, FINE, ACTIVATED CARBON)	4	0.08	0.33	0.06	0.38	SHPL/EL/N/183	03-06-2024	Not mentioned
45	1000 KVA OIL FILLED COPPER WOUND TRANSFORMER	1	11.90	11.90	2.14	14.04	PVJ/Q/055	21-07-2024	20-01-2025
46	1000 KVA COPPER WOUND SERVO STABILIZER	1	10.60	10.60	1.91	12.51	PVJ/Q/054	15-07-2024	14-01-2025
47	SILENT DG SET 500 KVA KIRLOSKAR	2	44.10	88.20	15.88	104.08	CR/JPR/SAH/24-25/009	05-06-2024	02-11-2024
48	LOAD SHARING PANEL WITH 500 KVA AMF, DISTRIBUTION AND APFC PANEL								
	- MAIN LT PANEL	1	14.99	14.99	2.70	17.69	CR/JPR/SAH/24-25/010	05-06-2024	02-11-2024
	- APFC PANEL	1	3.69	3.69	0.66	4.35	CR/JPR/SAH/24-25/010	05-06-2024	02-11-2024
49	ETP PLANT 40 KLD MS ERP EFFUENT TREATMENT PLANT	1	22.71	22.71	4.09	26.80	ST/JUNE-24/WWS/ETP/Q-3111	06-07-2024	05-01-2025
50	RO PLANT CAPACITY 5M3/HR	1	6.71	6.71	1.21	7.92	ST/JUNE-24/Q-3112	06-06-2024	Not mentioned
	WATER SOFTENER PLANT 500LTR RESIN CAP.	1	1.35	1.35	0.24	1.59	ST/JUNE-24/Q-3112	06-06-2024	Not mentioned
51	RO PLANT CAPACITY 12M3/HR	1	19.71	19.71	3.55	23.26	ST/JUNE-24/WWS/RO/Q-3110	06-06-2024	Not mentioned
52	M.S. PIPING & S.S. PIPING	-	185.00	185.00	33.30	218.30	ST/JUNE-24/SPG/Q-3114	26-07-2024	25-01-2025
53	VICTREX WATER STORAGE TANKS								
	- 10000 LTRS.	4	0.59	2.37	0.43	2.80	Not mentioned	04-06-2024	03-12-2024
	- 5000 LTRS.	4	0.28	1.10	0.20	1.30	Not mentioned	04-06-2024	03-12-2024
	- 2000 LTRS.	5	0.10	0.48	0.09	0.57	Not mentioned	04-06-2024	03-12-2024
	- 1000 LTRS.	5	0.05	0.24	0.04	0.29	Not mentioned	04-06-2024	03-12-2024
54	ELECTRIC WIRE ROPE HOIST CAP WITH TROLLEY	1	1.10	1.10	0.20	1.30	KY-EST/2024-25/0140	21-07-2024	20-01-2025
55	END CARRAGE	1	1.05	1.05	0.19	1.24	KY-EST/2024-25/0140	21-07-2024	20-01-2025
56	ELECTRIC WIRE ROPE HOIST CAP WITH TROLLEY	1	1.60	1.60	0.29	1.89	KY-EST/2024-25/0140	21-07-2024	20-01-2025
57	END CARRAGE	1	1.15	1.15	0.21	1.36	KY-EST/2024-25/0140	21-07-2024	20-01-2025
	<b>Total</b>		<b>1409.86</b>	<b>3151.95</b>	<b>567.35</b>	<b>3719.31</b>			
	Add: Freight, Loading, Unloading, Insurance, Erection & Commissioning etc.	@	3.00%		approx.	110.69			
	<b>Grand Total</b>					<b>3830.00</b>			

Note: An advance of Rs.2.50 Lakhs to M/S Excel Plant & Equipment Limited for (Main Plant) and Rs. 2.75 Lakhs to M/s. Thermax Limited (for Steam Condensate Circuit) has been made upto March 2024.

Our Promoters, Directors, and Key Managerial Personnel do not have any interest in the proposed acquisition of the plant and machinery or in the entity from whom we have obtained quotations in relation to such proposed acquisition of the plant and machinery for the proposed project and no second-hand or used equipment and machinery is proposed to be purchased out of the Net Proceeds.

**IV. Under the heading “Break-up of the estimated costs - VII. Working Capital Margin” in the chapter “OBJECT OF THE OFFER” beginning on page 103 of the Draft red herring Prospectus shall be updated to reflect as under.**

**VII. Working Capital Margin**

The initial working capital requirement for starting the project is estimated at ₹ 2,000 Lakhs. It has been estimated that a CC limit of ₹ 1,500 Lakhs would be sufficient for operations of the plant. However, such CC limit requirements have not been appraised by any bank or financial institution. The working capital margin of ₹ 500 Lakhs (25%) forms part of project cost will be met from Internal accruals of our Company i.e Shri Ahimsa Naturals Limited.

Working Capital Margin/Requirement represents the funds a company requires to fund its day-to-day operations and maintain liquidity. The proposed project in WOS requires ₹ 20.00 Crores of working capital which will be funded by;

- Internal Accruals of Holding Company - ₹500.00 lakhs
- Bank Credit Limit (CC Limit): ₹1,500.00 lakhs

The Company requires funds for working capital for the following:

(₹ in Lakhs)

S.No.	Particulars	No.of Days	Margin %	Total Amount	Margin Money	Bank Finance
1	Raw Material	40	25%	1,000.76	250.19	750.57
2	Consumables	40	25%	50.04	12.51	37.53
3	Packing Material	50	25%	25.02	6.25	18.76
4	Fuel	50	25%	57.28	14.32	42.96
5	W.I.P.	3	25%	83.81	20.95	62.86
6	Finished Goods	12	25%	370.27	92.57	277.70
7	Book Debts	9	25%	413.33	103.33	310.00
8	Less : Sundry Creditors (Raw Material)	0	25%	0.00	0.00	0.00
	<b>Total</b>			<b>2,000.52</b>	<b>500.13</b>	<b>1,500.39</b>
	<b>Restricted to</b>			<b>2,000.00</b>	<b>500.00</b>	<b>1,500.00</b>

**V. Under the heading “Environmental Aspects” in the chapter “OBJECT OF THE OFFER” beginning on page 105 of the Draft Red Herring Prospectus shall be updated to reflect as under.**

**Environmental Aspect:**

Discharge from factory shall meet to the specifications laid down by local authority governing Air Pollution & Water Pollution. An Effluent Treatment Plant of 40 KLD is proposed under the project. Two RO plants are also proposed to be procured under the project to take care of the water treatment for which our company has obtained quotation from Sagar Technochem for Design, Engineering, Supply, Installation and commissioning of Effluent Treatment Plant of 40 KLD and RO plant capacity 12M3/HR & 5M3/HR. The installation of both plants is scheduled for completion by the end of the fiscal year 2025-26. Following this, the plants will be fully operational, enabling efficient treatment of industrial wastewater and reliable supply of purified water for manufacturing process.

**Machinery Details:**

1. Effluent Treatment Plant of 40 KLD: It will be used for the purification of industrial waste water which will be generated during manufacturing of finished goods. Treated water shall be used for horticulture application as well as toilet flushing or further processed in RO plant for drinking water. The sludge collected shall be used as manure for the plants.
2. RO plant capacity 12M3/HR & 5M3/HR: Water sourced from government / private supplies and treated water from above process shall be further processed for safe drinking water.

All other related environmental & pollution aspects shall be taken care of. Nevertheless, necessary “Consent to Operate” from Pollution Control Board shall be obtained at an appropriate time.

## OUR BUSINESS

- I. Under the heading “*Details of our Product*” in the chapter “OUR BUSINESS” beginning on page 136 of the Draft Red Herring Prospectus shall be updated to reflect as under.

***Details of our Product:***

Our product portfolio includes:

Product	Brief Description	Application Industry
<b>Manufactured Product</b>		
Caffeine Anhydrous Natural	Caffeine anhydrous is a widely utilized stimulant that is believed to enhance mental and physical performance. It is a white, odourless alkaloid with bitter taste. The "anhydrous" in its name means "without water," indicating that it is caffeine in a dry, powdered form. The dehydration process involves extracting caffeine from its sources and then purifying and crystallizing it to remove the water content, resulting in a highly concentrated form. The main raw material for Natural Caffeine is Crude Caffeine. It is unrefined form of caffeine extracted from natural sources, typically from plants such as coffee beans, tea leaves, or cocoa beans. In addition to Caffeine Anhydrous Natural, there is a cheaper alternative available in the market known as Synthetic Caffeine, which is produced through the processing of urea.	Pharmaceuticals Food & Beverage Nutraceuticals Cosmetics
Green Coffee Bean Extract (GCE)	Green coffee bean extract is generally derived from unroasted coffee beans and is known for its high content of chlorogenic acids, which have antioxidant properties and potential health benefits. Unlike regular coffee, GCE contains less caffeine but higher levels of chlorogenic acids, which are believed to aid in weight loss by reducing carbohydrate absorption and regulating blood sugar levels. Additionally, these acids may help lower blood pressure, contributing to heart health. In contrast to the standard practice of extracting GCE from green unroasted coffee beans, company extracts GCE as an additional product, alongside Caffeine Anhydrous Natural, from the crude caffeine we receive from select sources.	Pharmaceuticals Food & Beverage Nutraceuticals
Crude caffeine	Crude caffeine is unrefined caffeine, it the starting material in manufacturing the pure caffeine used in beverages, foods, and medicines. Crude caffeine refers to the raw form of caffeine extracted from natural sources, typically from plants such as coffee beans, tea leaves, or cocoa beans. It is a bitter white powder that contains stimulant properties and is commonly used in various industries such as food and beverages, pharmaceutical, and cosmetic. We extract Crude Caffeine primarily from Tea waste and Coffee waste.	Manufacturing Caffeine Anhydrous Natural
<b>Trading Products</b>		
Senna Leaf P.E	Senna Leaf is an herb commonly known as senna or Alexandrian senna, and its scientific name is <i>Cassia angustifolia</i> . Senna is often taken as a tea, capsule, tablet or liquid extract.	Nutraceuticals
Ashwagandha Extract	Ashwagandha is an herb that can help in boosting energy levels and improves overall health. It is believed that inclusion of this herb in daily diet can help in reducing anxiety, fatigue and improves depression	Nutraceuticals
Turmeric Extract Curcumin	Curcumin is a water-soluble bright yellow (orange - yellow) chemical produced by <i>Curcuma longa</i> plants. It is the principal curcuminoid of turmeric ( <i>Curcuma longa</i> ), a member of the ginger family, <i>Zingiberaceae</i> .	Nutraceuticals

Garcinia Cambogia P.E	Garcinia cambogia is an herbal product derived from fruit of the Malabar tamarind tree (also called Garcinia gummi gutta) which is native to India, Nepal, and Sri Lanka.	Nutraceuticals
Bacopa Monnieri P.E	Bacopa is a herb used in Ayurveda, where it is also known as "Brahmi". Brahmi has been applied in Ayurveda since many generations in different mental conditions such as anxiety, poor cognitive abilities, and lack of concentration, as a nerve tonic and treatment of neurological disease.	Nutraceuticals

With respect to the traded products as mentioned above, our Company commenced trading in herbal products in 2021, with the aim of expanding its herbal extract portfolio. Our Company started its trading business journey with Senna Leaf P.E, Ashwagandha Extract, Turmeric Extract (Curcumin), Garcinia Cambogia P.E, and Bacopa Monnieri P.E. Going forward our company intends to expand its portfolio by adding other products such as White Kidney Beans Extracts, Tea Polyphenol etc., depending upon the acceptability, market demand and usage of the products.

Currently, our Company serves two customer segments in trading business: end users and resellers. The primary rationale for expanding into the trading products is to leverage our reseller customer base, which deals with multiple products.

Our Company has started supplying to few customers both traded goods (such as Senna Leaf P.E., Ashwagandha Extract, Turmeric Extract (Curcumin), Garcinia Cambogia P.E., and Bacopa Monnieri P.E.) along with our manufactured goods (Caffeine Anhydrous Natural and Green Coffee Bean Extract). By leveraging on this readily available customer base and our relationship with these customers we aim to expand our trading business.

Our Company sources and procures herbal products domestically from various suppliers whose products meet our quality criteria's. These products are delivered to our manufacturing facilities by the suppliers, where they undergo thorough quality checks in accordance with customer specifications, post which they go for labelling and packaging, once the products are securely packed, they are exported.

Currently our trading product portfolio includes: Senna Leaf P.E, Ashwagandha Extract, Turmeric Extract (Curcumin), Garcinia Cambogia P.E, and Bacopa Monnieri P.E as tabulated above.

**II. Addition of new heading "Revenue bifurcation as per business model", "Revenue bifurcation of export and deemed export", "Geographical breakup of Revenue" and "Industry wise revenue bifurcation" after the heading "Details of our Product" in the chapter "OUR BUSINESS" beginning on page 137 of the Draft Red Herring Prospectus shall be added to reflect as under.**

**Revenue bifurcation as per business model is as under:**

(₹ in Lakhs unless stated otherwise)

Particulars	FY2024	% of Revenue from operations	FY2023	% of Revenue from operations	FY2022	% of Revenue from operations
B2B	7,808.16	100.00	10,412.78	100.00	5,804.40	100.00
B2C*	-	-	-	-	-	-
<b>Total Sales</b>	<b>7,808.16</b>	<b>100.00</b>	<b>10,412.78</b>	<b>100.00</b>	<b>5,804.40</b>	<b>100.00</b>

\*We supply products to two types of customer's End user and Resellers, both of them being Business to Business (B2B) customers.

**Product Wise Revenue:**

(₹ in lakhs, unless stated otherwise)

Particulars	Financial Year ended March 31, 2024*	%	Financial Year ended March 31, 2023*	%	Financial Year ended March 31, 2022*	%
<b>Our Manufactured Products</b>						
Caffeine Anhydrous Natural	6,975.51	89.34	9,416.71	90.43	4,534.27	78.12
Green Coffee Bean Extract	574.23	7.35	732.33	7.03	976.72	16.83
Crude Caffeine	126.87	1.62	118.11	1.14	116.21	2.00
<b>Our Traded Products</b>						
Herbal Extracts Products	131.55	1.69	142.74	1.37	160.67	2.77
<b>Our Other Operating Revenues:</b>						

Other Operating Income	-	-	2.59	0.02	16.53	0.28
Others	-	-	0.30	0.00	-	-
<b>Total</b>	<b>7,808.16</b>	<b>100.0</b>	<b>10,412.78</b>	<b>100.0</b>	<b>5,804.40</b>	<b>100.0</b>

Revenue bifurcation of export and deemed export is as under:

(₹ in Lakhs unless stated otherwise)

Particulars	FY2024	% of Revenue from operations	FY2023	% of Revenue from operations	FY2022	% of Revenue from operations
<b>Export Sales</b>						
- Direct Export	1835.59	23.51	5308.93	50.98	3058.84	52.70
- Deemed Export*	5200.65	66.61	4480.74	43.03	1929.38	33.24
- Third Party Export	400.47	5.12	198.34	1.91	645.29	11.12
<b>Total Export Sales</b>	<b>7436.71</b>	<b>95.24</b>	<b>9988.01</b>	<b>95.92</b>	<b>5633.5</b>	<b>97.06</b>

\*Sales to EOU unit is considered as Deemed export as per Goods and Service Tax Act, 2017.

Geographical breakup of Revenue

(₹ in Lakhs unless stated otherwise)

Particulars	FY 2024	% of Revenue from operations	FY 2023	% of Revenue from operations	FY 2022	% of Revenue from operations
<b>Export Sales</b>						
USA	827.87	10.60	4,049.92	38.89	2,233.99	38.49
Ireland	311.43	3.99	289.30	2.78	175.23	3.02
Germany	201.62	2.58	62.23	0.60	-	-
South Korea	183.07	2.34	376.04	3.61	235.70	4.06
UK	92.28	1.18	117.90	1.13	66.23	1.14
Thailand	197.24	2.53	87.51	0.84	138.44	2.39
Other	22.08	0.28	326.03	3.13	209.25	3.61
<b>Direct Export Sales (A)</b>	<b>1,835.59</b>	<b>23.51</b>	<b>5,308.93</b>	<b>50.98</b>	<b>3,058.84</b>	<b>52.70</b>
<b>EOU/Deemed Exports</b>						
Karnataka	5149.15	65.95	4,329.00	41.57	1,866.87	32.16
Kerala	51.50	0.66	109.24	1.05	-	-
Tamil Nadu	-	-	42.50	0.41	62.51	1.08
<b>Total EOU/Deemed Exports Sales (B)</b>	<b>5,200.65</b>	<b>66.61</b>	<b>4,480.74</b>	<b>43.03</b>	<b>1929.38</b>	<b>33.24</b>
<b>Third Party Export</b>						
Others*	400.47	5.12	198.34	1.91	645.29	11.12
<b>Total Third Party Exports Sales (C)</b>						
<b>Total Export Sales (A+B+C)</b>	<b>7,436.71</b>	<b>95.24</b>	<b>9,988.01</b>	<b>95.92</b>	<b>5,633.50</b>	<b>97.06</b>
<b>Domestic Sales</b>						
Karnataka	127.26	1.63	13.50	0.13	64.63	1.11
Telangana	198.48	2.54	62.78	0.60	-	-
Uttar Pradesh	16.15	0.21	16.15	0.16	6.75	0.12
Uttarakhand	9.23	0.12	5.95	0.06	4.83	0.08
Madhya Pradesh	4.64	0.06	17.43	0.17	3.71	0.06
Other	15.69	0.20	308.96	2.97	90.98	1.57
<b>Total Domestic Sales (D)</b>	<b>371.45</b>	<b>4.76</b>	<b>424.77</b>	<b>4.08</b>	<b>170.90</b>	<b>2.94</b>
<b>Total Sales (A+B+C+D)</b>	<b>7,808.16</b>	<b>100.00</b>	<b>10,412.74</b>	<b>100.00</b>	<b>5,804.40</b>	<b>100.00</b>

\*Since this is being exported by the third party, we are not privy to the country in which they are exporting the material.



### Industry wise revenue bifurcation

(₹ in Lakhs unless stated otherwise)

Particulars	FY 2024	% of Revenue from operations	FY 2023	% of Revenue from operations	FY 2022	% of Revenue from operations
Nutraceuticals	5,236.18	67.06	4,329.00	41.57	1,866.88	32.16
Food & beverage	279.68	3.58	492.75	4.73	272.12	4.69
Pharmaceuticals	1.03	0.01	-	-	1.03	0.02
Cosmetics	0.42	0.01	0.60	0.01	0.45	0.01
Resellers*	2,290.86	29.34	5,590.43	53.69	3,663.94	63.12
<b>Total</b>	<b>7,808.16</b>	<b>100.00</b>	<b>10,412.78</b>	<b>100.00</b>	<b>5,804.40</b>	<b>100.00</b>

\*Since the product is being sold by the resellers we are not privy of the information as to which industry the product is being sold.

### III. Under the heading “Sales and marketing” in the chapter “OUR BUSINESS” beginning on page 148 of the Draft Red Herring Prospectus shall be updated and added to reflect as under.

#### Sales and marketing

The company has taken various steps for Marketing to increase its sales such as:

- We have participated and also actively participating in International & Domestic Exhibitions pertaining to Nutraceuticals and Food & beverage industry which are helpful in finding new buyers.
- We consistently enhance our database of various prospective industry-based buyers and reaching them by emails regularly through newsletters and introduction of new developments
- We are promoting our websites persistently to reach various B2B customers
  - At present, we reach B2B customers primarily through participation in various global exhibitions, where we engage directly with potential clients. In last 3 years we have participated in exhibitions in US, Germany etc. Additionally, we conduct targeted email marketing campaigns to introduce and promote our products. We also employ targeted marketing strategies for our website to enhance visibility among potential customers, as such when a person search for Natural Caffeine our website [www.naturalcaffeine.co.in](http://www.naturalcaffeine.co.in) is displayed on the very first page.
  - We do not sell our products directly through online platforms. One of our customer purchases products from us and sell it on its website showing us as sourcing factory. We do outright sales to the customer and all the return claims and customer complaints are handled by the customer and we do not have any responsibility of the same.

### IV. Under the heading “Human Resource” in the chapter “OUR BUSINESS” beginning on page 149 of the Draft Red Herring Prospectus shall be updated and added to reflect as under.

#### Human Resource

As on date of this Draft Red Herring Prospectus, we have 80 employees with our Company and we do not have any contractual employees in the Company. Our manpower is a prudent mix of the experienced and young people which gives us the dual advantage of stability and growth, along with assurance of quality.

Department wise bifurcation of our employees is as under: -

Department	No. of Employees
Purchase	2
Production	44
Maintenance	8
Accounts/Finance	4
Admin	3
Transport	2
Laboratory/Quality Control	4
Security	2
Store	4
Company Management	7
<b>Total No. of employees</b>	<b>80</b>

In addition to the aforementioned, our Company also engages contractual laborers, which varies depending on the business's operational requirements. In accordance with the existing provisions of sub-section (4) of Section 1 of the Contract Labour (Regulation and Abolition) Act, 1970, as amended by The Contract Labour (Regulations and Amendment) (Rajasthan Amendment) Act, 2014, our Company has not employed 50 or more workmen as contract labor on any given day during the preceding twelve months.

**V. Under the heading “Insurance” in the chapter “OUR BUSINESS” beginning on page 150 of the Draft Red Herring Prospectus shall be updated and added to reflect as under.**

**Insurance**

Our business faces various risks associated with the storage and transportation of our materials and products, such as floods, theft, fires, earthquakes, other natural disasters, terrorism, and force majeure events. These occurrences can severely damage our products or raw materials, lead to inventory loss, or completely destroy our property. To mitigate these risks, the company has secured extensive insurance coverage for its assets.

**Details of the insurance is as below:**

Policy No.	Name of Policy	Policy Period	Coverage	Policy issuer	Total Sum Insured
1403061124P10794250 4	Standard Fire and Perils Policy	22.09.2024 to 21.09.2025	Stocks	United Insurance Company Limited	25,00,00,000/-
1403061124P10794250 4	Standard Fire and Perils Policy	22.09.2024 to 21.09.2025	Plant & Machinery	United Insurance Company Limited	21,00,00,000/-
1403061124P10794250 4	Standard Fire and Perils Policy	22.09.2024 to 21.09.2025	Furniture & Fixtures	United Insurance Company Limited	70,00,000/-
1403061124P10794250 4	Standard Fire and Perils Policy	22.09.2024 to 21.09.2025	Building	United Insurance Company Limited	14,00,00,000/-
3713003123114987716 8	Bundled Motor Policy – 3 year TP + 1 year OD (Private Vehicle)	13.12.2023 to 12.12.2024	Car Insurance	National Insurance Company Limited	7,13,450/-
2302 2066 8673 0200 000	Private Car Comprehensive Policy	08.08.2024 to 07.08.2025	Car Insurance	HDFC ERGO General Insurance Company Limited	8,22,903/-
D142715707/04042024	Stand alone Own Damage Policy	11.04.2024 to 10.04.2025	Car Insurance	Go Digit General Insurance Limited	17,00,000/-
3001/O/358837977/00/ 000	Stand-Alone Own Damage Private Car Insurance Policy	08.09.2024 to 07.09.2025	Car Insurance	ICICI Lombard General Insurance Company Limited	16,00,000/-
VPB02051840000100	Private Car Package Policy	01.12.2023 to 30.11.2024	Car Insurance	Royal Sundaram General Insurance Company Limited	4,58,047/-

P012008241762895	Private Motor 4 wheeler Policy	31.08.2024 to 30.08.2025	Car Insurance	SBI General Insurance Company Limited	24,00,000/-
1403062311544	Marine Cargo Open Cover	21.12.2023 to 20.12.2024	Marine cargo Open Cover	United India Insurance Company	5,00,00,000/-
1403062311545	Marine Cargo Open Cover	21.12.2023 to 20.12.2024	Marine cargo Open Cover	United India Insurance Company	5,00,00,000/-
3003/355548944/00/B00	Goods Carrying Vehicles Package Policy	10.08.2024 to 09.08.2025	Vehicle Insurance	ICICI Lombard General Insurance Company Limited	4,00,000/-

VI. Under the heading “Property” in the chapter “OUR BUSINESS” beginning on page 151 of the Draft Red Herring Prospectus shall be updated and added to reflect as under.

**Property**

• *Immovable Property*

Sr. No	Location	Owned / Rented	Size	Description of Use	Term of agreement	Lease / Rent amount	Name of Lessor
3.	Flat No - L-403, On 4 <sup>th</sup> Floor, Ashiana Amantran Gram Keshopura, Ajmer Road, Near Vaishali Nagar ext, Jaipur	Owned	154.68 Sq Mtrs	Guest House	NA	NA	NA

## KEY REGULATIONS AND POLICIES IN INDIA

Under the heading “*Employment and Labour Law Legislations*” and “*Other Applicable Laws*” in the chapter “KEY REGULATIONS AND POLICIES IN INDIA” beginning on page 153 of the Draft red herring Prospectus shall be updated to reflect as under.

### EMPLOYMENT AND LABOUR LAW LEGISLATIONS

#### Indian Boilers Act, 1923:

The Indian Boilers Act, 1923 regulates the manufacture, possession, and use of boilers. Under this Act, an owner of a boiler is required to get it registered and certified for use by an inspector appointed by the relevant State Government. Additionally, the Indian Boiler Regulations, 1950 prescribe the materials, procedures, and inspection techniques for the manufacture of boilers and their mountings and fittings.

#### Contract Labour (Regulation and Abolition) Act, 1970 (the “CLRA”) read with Contract Labour (Regulation and Abolition) (Rajasthan Amendment) Act, 2014

The CLRA requires establishments that employ or have employed on any day in the previous 12 months, 50 or more workmen as contract labour to be registered and prescribes certain obligations with respect to the welfare and health of contract labour. The CLRA places an obligation on the principal employer of an establishment to which the CLRA applies to make an application for registration of the establishment. In the absence of registration, contract labour cannot be employed in the establishment. Likewise, every contractor to whom the CLRA applies is required to obtain a licence and not to undertake or execute any work through contract labour except under and in accordance with the licence issued. To ensure the welfare and health of contract labour, the CLRA imposes certain obligations on the contractor including the establishment of canteens, rest rooms, washing facilities, first aid facilities, and provision of drinking water and payment of wages. In the event that the contractor fails to provide these amenities, the principal employer is under an obligation to provide these facilities within a prescribed time period. Our Company also engages contractual laborers, which varies depending on the business's operational requirements. In accordance with the existing provisions of sub-section (4) of Section 1 of the Contract Labour (Regulation and Abolition) Act, 1970, as amended by The Contract Labour (Regulations and Amendment) (Rajasthan Amendment) Act, 2014, our Company has not employed 50 or more workmen as contract labor on any given day during the preceding twelve months.

### OTHER APPLICABLE LAWS

#### MSME Act, 2006

The Micro, Small and Medium Enterprises Development Act, 2006 was enacted to promote and enhance the competitiveness of Micro, Small, and Medium Enterprises (MSME). As per the Central Government's notification no. F. No. 2/1(5)/2019-P&G/Policy (Pt.-IV) dated June 01, 2020, effective from July 01, 2020, the classification criteria for MSMEs are as follows:

- **Micro enterprise:** Investment in plant and machinery or equipment does not exceed ₹1 crore and turnover does not exceed ₹5 crore.
- **Small enterprise:** Investment in plant and machinery or equipment does not exceed ₹10 crore and turnover does not exceed ₹50 crore.
- **Medium enterprise:** Investment in plant and machinery or equipment does not exceed ₹50 crore and turnover does not exceed ₹250 crore.

## OUR MANAGEMENT

Under the heading “*Board of Directors*” and “*Brief profiles*” in the chapter “OUR MANAGEMENT” beginning on page 164 of the Draft red herring Prospectus shall be updated to reflect as under.

### BOARD OF DIRECTORS

Sr. No.	Name, address, DIN, date of birth, term, period of directorship, occupation	Designation	Other directorships
1.	<p><b>Mr. Nemi Chand Jain</b></p> <p><i>DIN:</i> 00434383</p> <p><i>Date of Birth:</i> March 01, 1953</p> <p><i>Age:</i> 71 years</p> <p><i>Qualification:</i> Master in Management Studies<sup>#</sup></p> <p><i>Experience:</i> 35 years</p> <p><i>Address:</i> 202, Upsana Apartment, E-14, Bihari Marg, Banipark, Shastri Nagar, Jaipur- 302016, Rajasthan, India.</p> <p><i>Occupation:</i> Business</p> <p><i>Current Term:</i> For a period of three years from July 01, 2023 to June 30, 2026 and liable to retire by rotation.</p> <p><i>Original Date of Appointment:</i> Since October 17, 1990</p> <p><i>Nationality:</i> Indian</p>	Chairman and Managing Director	<p><b>Indian Companies</b></p> <ul style="list-style-type: none"> <li>• M/s Bimneer Investments Private Limited</li> <li>• M/s Ahimsa Holdings Private Limited</li> </ul> <p><b>Foreign Companies</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>
4.	<p><b>Mrs. Sumitra Jain</b></p> <p><i>DIN:</i> 00614391</p> <p><i>Date of Birth:</i> May 30, 1956</p> <p><i>Age:</i> 68 years</p> <p><i>Qualification:</i> N.A<sup>*</sup></p> <p><i>Experience:</i> 30 years</p> <p><i>Address:</i> 202, Upsana Apartment, E-14, Bihari Marg, Banipark, Shastri Nagar, Jaipur- 302016, Rajasthan, India.</p> <p><i>Occupation:</i> Business</p> <p><i>Current Term:</i> Appointed as Non-Executive Director with effect from February 29, 2024 and liable to retire by rotation</p> <p><i>Original Date of Appointment:</i> Since June 26, 1995</p> <p><i>Nationality:</i> Indian</p>	Non-Executive Director	<p><b>Indian Companies</b></p> <ul style="list-style-type: none"> <li>• M/s Bimneer Investments Private Limited</li> </ul> <p><b>Foreign Companies</b></p> <ul style="list-style-type: none"> <li>• Nil</li> </ul>

<sup>#</sup>Only Provisional Certificate available

<sup>\*</sup>Relevant documents for the same are not available.

## **Brief profiles of our Directors**

**Mr. Nemi Chand Jain**, aged 71, Chairman and Managing Director of our Company. He is also the founder of our Company. He is responsible for overseeing critical operational and growth-oriented functions of the Company. He holds the Masters degree in Management Studies from BITS, Pilani. He has been associated with our Company since incorporation as a Director and Promoter. Mr. Nemi Chand Jain commenced his professional journey in the caffeine industry, initially collaborating with his brother in Guwahati. Later, he moved to Jaipur, where he founded Ahimsa Mines and Minerals Private Limited on October 17, 1990, with the Objects of setting up a gang saw unit and engaging in the mining and trading of stones which he was discontinued and again in 1997, he shifted the focus to the caffeine industry and it has been involved in the manufacturing and business of caffeine. In line with the operation of our Company, he has gained experience of 35 years majorly in caffeine industry.

**Mr. Om Prakash Bansal**, aged 54 years, is an Independent Director on the Board of our Company. He holds the degree of Bachelors of Commerce (Hons) from University of Ajmer. Mr. Om Prakash Bansal is a Chartered Accountant by qualification. He has been engaging himself as a Professional Consultant for providing Finance, Project management and Business Consultancy to various Private Companies and LLPs. He is an associate member of the Institute of Chartered Accountants of India since year 1992. He has work experience of more than 25 years in the field of finance, taxation, audit. He is currently providing Finance Consultancy to businesses. He has been associated with our Company since January 06, 2023.

**Mr. Manoj Maheshwari**, aged 54 years, is an Independent Director of our company. Mr. Manoj Maheshwari is a Practicing Company Secretary and has been associated as a partner with the M/s V. M. & Associates since 1993 rendering whole gamut of corporate advisory services relating to Corporate Law, Legal, Finance and Management field, etc. to listed and unlisted companies. He has 31 years of experience in the field of corporate restructuring and secretarial practice. He has been associated with our Company since January 06, 2023.

## OUR PROMOTERS AND PROMOTER GROUP

- I. Under the heading “*Our Promoters*” in the chapter “OUR PROMOTER AND PROMOTER GROUP” beginning on page 182 of the Draft Red Herring Prospectus shall be updated to reflect as under.

### Our Promoters

Mr. Nemi Chand Jain, Mrs. Sumitra Jain, Mr. Amit Kumar Jain, Mr. Sumit Jain, Mrs. Prerna Jain, M/s Ahimsa Holdings Private Limited and M/s Binneer Investments Private Limited are the Promoters of our Company. As on the date of this Draft Red Herring Prospectus, our Promoters’ shareholding in our Company is as follows:

Sr. No.	Name of the Shareholder	Number of Equity shares held	% of pre-offer offered, subscribed and paid-up Equity Share capital*
1.	Mr. Nemi Chand Jain	74,05,300	38.72
2.	Mrs. Sumitra Jain	26,04,000	13.61
3.	Mr. Amit Kumar Jain	39,02,500	20.40
4.	Mr. Sumit Jain	4,37,500	2.29
5.	Mrs. Prerna Jain	5,68,750	2.97
6.	M/s Ahimsa Holdings Private Limited	15,47,000	8.09
7.	M/s Binneer Investments Private Limited	12,26,750	6.41
	<b>Total</b>	<b>1,76,91,800</b>	<b>92.50</b>

\*Rounded-off to the closest decimal

For details of the Equity Shares held by Promoter and members of Promoter Group in our Company, see “*Capital Structure – The aggregate shareholding of the Promoters and Promoter group*” beginning from page no 66.

- II. Under the heading “A. *Details of our Individual Promoters*” in the chapter “OUR PROMOTER AND PROMOTER GROUP” beginning on page 182 of the Draft Red Herring Prospectus shall be updated to reflect as under.

### A. Details of our Individual Promoters

---

#### Mrs. Prerna Jain

Mrs. Prerna Jain aged 40 years, is the Promoter of our Company

**Date of birth:** November 13, 1983

**Address:** F-1004, Tower-LH 11, DC Lanco Hills, Manikonda, K.V. Rangareddy, Telangana – 500089

**Permanent account number:** AMEPJ3229J

**Education Qualifications:** Bachelor of Architecture (B. Arch) from University of Rajasthan and Master of Urban and Rural Planning from Indian Institute of Technology, Roorkee

**Experience:** Over 5 years of experience in master planning of residential, office, mix-use development, industrial, warehouse, halls, premium lounges.

**Other directorships:** N.A.

**Business and financial activities:** Employment

---

Our Company confirms that the permanent account number, bank account number(s), passport number, Aadhaar card number and driving license number of Mr. Nemi Chand Jain, Mrs. Sumitra Jain, Mr. Amit Kumar Jain, Mr. Sumit Jain and Mrs. Prerna Jain shall be submitted to the Stock Exchange at the time of filing of this Draft Red Herring Prospectus.

**III. Under the heading “Experience of our Individual Promoters in the business of our Company” in the chapter “OUR PROMOTER AND PROMOTER GROUP” beginning on page 187 of the Draft Red Herring Prospectus shall be updated to reflect as under.**

**Experience of our Individual Promoters in the business of our Company**

Except for Mrs. Sumitra Jain, Mr. Sumit Jain and Mrs. Prerna Jain all our Individual Promoters are experienced in the line of business in which our Company operates. For details in relation to experience of our Promoters in the business of our Company, see “Our Management” on page no 164.

**IV. Under the heading “Promoter Group” in the chapter “OUR PROMOTER AND PROMOTER GROUP” beginning on page 187 of the Draft Red Herring Prospectus shall be updated to reflect as under.**

**Promoter Group**

Apart from our Promoters, as per Regulation 2(1)(pp) of the SEBI ICDR Regulations, the following individuals and entities shall form part of our Promoter Group:

**1. Natural persons forming part of our Promoter Group (other than our Promoter):**

As per Regulation 2(1)(pp)(ii) of the SEBI ICDR Regulations, the following individuals form part of our Promoter Group:

Relationship	Name of the Relative				
	Mr. Nemi Chand Jain	Mr. Amit Kumar Jain	Mrs. Sumitra Jain	Mr. Sumit Jain	Mrs. Prerna Jain
Father	Late Mool Chand Jain	Mr. Nemi Chand Jain	Late Gulab Chand Patni	Mr. Nemi Chand Jain	Mr. Nemi Chand Jain
Mother	Late Kanchan Devi Jain	Mrs. Sumitra Jain	Late Chanda Devi Jain	Mrs. Sumitra Jain	Mrs. Sumitra Jain
Spouse	Mrs. Sumitra Jain	Mrs. Deepti Jain	Mr. Nemi Chand Jain	Mrs. Nidhi Jain	Mr. Sourav Kumar
Brother	<i>Mr. Pradip Jain*</i> <i>Mr. Prakash Jain*</i> <i>Mr. Bimal Jain*</i> <i>Mr. Anil Jain*</i> <i>Mr. Rajesh Jain*</i> <i>Mr. Dipak Jain*</i> <i>Mr. Ajit Jain*</i>	Mr. Sumit Jain	<i>Mr. Suresh Patni*</i> <i>Mr. Sunil Patni*</i> <i>Mr. Anil Patni*</i> <i>Mr. Lalit Patni*</i>	Mr. Amit Kumar Jain	Mr. Amit Kumar Jain Mr. Sumit Jain
Sister	<i>Mr. Sulochana Jain*</i> <i>Mr. Sushila Jain*</i> <i>Mr. Sarita Jain*</i> <i>Mr. Babita Jain*</i>	Mrs. Prerna Jain	<i>Mrs. Neha Jain*</i>	Mrs. Prerna Jain	-
Son	Mr. Amit Kumar Jain Mr. Sumit Jain		Mr. Amit Kumar Jain Mr. Sumit Jain	Mr. Ansh Jain	Mr. Samarth Jain Mr. Samridh Jain
Daughter	Mrs. Prerna Jain	Ms. Kavya Jain Ms. Pehr Jain	Mrs. Prerna Jain	-	-
Spouse’s Father	Late Gulab Chand Jain	Mr. Chandra Prakash Jain	Late Mool Chand Jain	Mr. Om Prakash Sethi	Mr. Bimal Kumar Jain
Spouse’s Mother	Late Chanda Devi Jain	Mr. Late Varsha Sogani	Late Kanchan Devi Jain	Mrs. Santosh Devi Jain	Mrs. Manju Jain
Spouse’s Brother	<i>Mr. Suresh Patni*</i> <i>Mr. Sunil Patni*</i> <i>Mr. Anil Patni*</i> <i>Mr. Lalit Patni*</i>	Mr. Deepak Sogani Mr. Late Chirag Sogani	<i>Mr. Pradip Jain*</i> <i>Mr. Prakash Jain*</i> <i>Mr. Bimal Jain*</i> <i>Mr. Anil Jain*</i> <i>Mr. Rajesh Jain*</i> <i>Mr. Dipak Jain*</i> <i>Mr. Ajit Jain*</i>	-	Mr. Shobhit Kumar



Spouse's Sister	Mrs. Neha Jain*	-	Mrs. Sulochana Jain* Mrs. Sushila Jain* Mrs. Sarita Jain* Mrs. Babita Jain*	Mrs. Cherry Sethi Mrs. Prachi Jain	-
-----------------	-----------------	---	--	---------------------------------------	---

\* The Dissenting members have been disclosed as part of our Promoter Group on the basis of them being an immediate relative of our Promoters. Such person however does not maintain any arrangement, dealing with our Company, neither have they entered into any financial transactions with us nor have any interest in the business activities of our Company. Our Promoters had taken course of action for collecting the information from said relative on January 01, 2024. Responding to which the Dissenting members had intimated through an affidavit their unwillingness to be identified, categorised and disclosing themselves and any entity relating to them as a member of Promoter Group of our Company. Followed by which our company had filed an exemption application dated February 26, 2024 (“**Exemption Application**”) under Regulation 300(1)(c) of the SEBI ICDR Regulations with SEBI seeking an exemption from considering and disclosing the Dissenting members as a part of Promoter Group of our Company.

In view of the non-receipt of the approval of Exemption Application from SEBI and in order to comply with the disclosure requirements specified under SEBI ICDR Regulations pertaining to members of the Promoter Group of the issuer company, our Company has disclosed such details pertaining to Dissenting members in this section titled “Our Promoter and Promoter Group” to the best of our Company’s knowledge and to the extent the information was available with the Company and accessible in the public domain including identified body corporates in which 20% or more of the shareholding is held by dissenting members as available & published on the websites of (i) Watchout Investors (accessible at <https://www.watchoutinvestor.com/>); (ii) CIBIL (accessible at <https://suit.cibil.com/>), (iii) BSE Limited (list of debarred entities accessible at <https://www.bseindia.com/investors/debent.aspx>); and (iv) National Stock Exchange of India Limited (accessible at <https://www.nseindia.com/regulations/member-sebi-debarred-entities>), (v) ROC Search on Ministry of Corporate Affairs’ (MCA) website (accessible at <https://www.mca.gov.in/>) on a ‘name search’ basis of Dissenting Members, to identify any adverse findings linked to the Dissenting members and identified body corporates. Consequently, the Company has made reasonable efforts to verify and include this information to the best of its knowledge, and has been able to obtain confirmation of the limited search results. Refer “**Risk Factors No. 1 Some of the immediate relatives of our Promoters, who are deemed to be a part of the Promoter Group under SEBI ICDR Regulations have not provided consent, information or any confirmations or undertakings pertaining to themselves which are required to be disclosed in relation to a member of the Promoter Group**” in this Draft Red Herring Prospectus on page no 26.

## 2. Entities forming part of our Promoter Group:

As per Regulation 2(1)(pp)(iv) of the SEBI ICDR Regulations, the following Companies/Trusts/ Partnership firms/HUFs or Sole Proprietorships are forming part of our Promoter group.

Sr. No.	Name of the entities
<b>Body corporates / entities in which at least 20% of the equity share capital is held by our Promoters or the immediate relatives as set out above of our Promoters / HUF</b>	
1.	M/s. Chandra Staffing Solutions Private Limited
2.	M/s. Nemi Chand Jain HUF
3.	M/s. Vardhman Tea Trading Company Private Limited
4.	M/s. Ahinsha Beverages Private Limited
5.	M/s. Ahinsha Ferrotech Private Limited
6.	M/s. Nalbari Chemicals and Pharmaceutical Works Private Limited
7.	M/s. Ashiana Cement Private Limited
8.	M/s. Beverages and Viands Solutions Private Limited
9.	M/s. Siddhesh Traders Private Limited
10.	M/s. Northern Footwear Private Limited
11.	M/s. Manak Weaving Private Limited
12.	M/s. Manak Sangemermer Private Limited
13.	M/s. Primemanak Textile Private Limited
14.	M/s. Kartikey Marbles Private Limited
15.	M/s. Sunil Kumar Patni HUF
16.	M/s. Anil Kumar Patni HUF
17.	M/s. Suresh Kumar Patni HUF
<b>Body corporate in which at least 20% of the equity share capital is held by the body corporates forming a part of our Promoter Group as set out above</b>	
1.	Nil

## SECTION V –FINANCIAL INFORMATION

Under the heading “Notes to accounts” “Note no.34” in the chapter “FINANCIAL INFORMATION” beginning on page 214 of the Draft Red Herring Prospectus shall be updated to reflect as under.

<b>Note 34 Restated Statement of Related Party Transactions</b>				
The management has identified the following individuals/parties as related parties of The Group for the purpose of reporting as per AS18-Related Party Transactions, which are as under:-				
(a)	<u>Key Managerial Personnel:</u>			
	Shri Nemi Chand Jain, Managing Director			
	Shri Amit Kumar Jain, Whole Time Director and Chief Financial Officer			
	Shri Dipak Kumar Jain, Whole Time Director			
	Smt. Sumitra Devi Jain, Whole Time Director			
	Shri Om Prakash Bansal, Independent Director			
	Shri Rakesh Kumar, Independent Director			
	Shri Ved Prakash Sujaka, Independent Director			
	Shri Manoj Mahehwari, Independent Director			
	Miss Aayushi Jain, Company Secretary			
	Shri Sumit Jain, Relative of Managing Director			
(b)	<u>Enterprises over which relatives of key managerial personnel are able to exercise significant influence:</u>			
	Tapestry Mart			
(c)	Details of Related Party Transactions are as under:-			
	<b>PARTICULARS</b>	<b>Consolidated As at 31.03.2024</b>	<b>Consolidated As at 31.03.2023</b>	<b>Standalone As at 31.03.2022</b>
<b>1</b>	<b>Transactions during the Year:</b>			
	<b>Loan Taken:</b>			
	Shri Nemi Chand Jain	83.00	48.00	133.25
	Shri Amit Kumar Jain	-	57.50	173.00
	Smt. Sumitra Devi Jain	28.00	27.05	54.85
	<b>Loan Repaid:</b>			
	Shri Nemi Chand Jain	7.00	28.00	157.48
	Shri Amit Kumar Jain	4.50	54.35	196.14
	Smt. Sumitra Devi Jain	50.00	-	63.54
	<b>Remuneration Paid:</b>			
	Shri Nemi Chand Jain	180.40	180.32	138.32
	Shri Amit Kumar Jain	90.29	95.81	83.22
	Smt. Sumitra Devi Jain	44.00	48.00	45.00
	Shri Sumit Jain	55.00	35.00	-
	Shri Dipak Kumar Jain	10.15	-	-
	Miss Aayushi Jain	4.20	1.40	-
	<b>Consultancy Fee Paid:</b>			
	Shri Dipak Kumar Jain	3.40	10.55	9.56
	<b>Director's Sitting Fee Paid:</b>			
	Shri Manoj Maheshwari	1.20	-	-
	Shri Om Prakash Bansal	1.20	-	-
	Shri Rakesh Kumar	1.20	-	-
	Shri Ved Prakash Sujaka	1.20	-	-
	<b>Interest Paid:</b>			
	Shri Nemi Chand Jain	9.39	1.71	3.58
	Shri Amit Kumar Jain	0.34	3.23	4.99
	Smt. Sumitra Devi Jain	4.64	1.53	1.84
	<b>Purchases:</b>			

	Tapestry Mart	24.96	43.69	-
<b>2</b>	<b>Amount outstanding at the Balance Sheet date:</b>			
	<b>Unsecured Loan taken:</b>			
	Shri Nemi Chand Jain	105.99	21.53	-
	Shri Amit Kumar Jain	1.86	6.06	-
	Smt. Sumitra Devi Jain	10.60	28.43	-
	<b>Trade Payables:</b>			
	Tapestry Mart	24.96	-	-
	<b>Other Current Liabilities:</b>			
	Shri Nemi Chand Jain	9.59	10.84	0.22
	Shri Amit Kumar Jain	5.00	0.54	1.32
	Smt. Sumitra Devi Jain	0.25	3.15	0.25
	Shri Dipak Kumar Jain	0.97	0.46	-
	Shri Sumit Jain	-	4.03	-
	Miss Aayushi Jain	0.35	-	-
	<b>Advance Paid:</b>			
	Shri Sumit Jain	1.00	-	-

**MANAGEMENT’S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS**

- I. Under the heading “Results of Operations Information for the financial year ended March 31, 2024 compared with financial year ended March 31, 2023” in the chapter “MANAGEMENT’S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS” beginning on page 228 of the Draft red herring Prospectus shall be updated and added to reflect as under.

**RESULTS OF OPERATIONS INFORMATION FOR THE FINANCIAL YEAR ENDED MARCH 31, 2024 COMPARED WITH FINANCIAL YEAR ENDED MARCH 31, 2023**

Particulars	Financial Year ended March 31, 2024 (₹ in Lakhs)	Financial Year ended March 31, 2023 (₹ in Lakhs)	Change in ₹ Lakhs	Change in %
Income				
Revenue from operations (Net)	7,797.69	10,388.80	(2,591.11)	(24.94%)
Other income	72.00	225.18	(153.18)	(68.03%)
<b>Total Income</b>	<b>7,869.69</b>	<b>10,613.98</b>	<b>(2,744.29)</b>	<b>(25.86%)</b>
Expenses				
Cost of materials consumed	4,063.05	3,519.15	543.90	15.46%
Purchases of stock-in-trade	120.86	99.16	21.70	21.88%
Changes in inventories of finished goods, work-in-progress and stock-in-trade	(1,114.08)	(342.82)	(771.26)	224.98%
Employee benefits expenses	613.56	547.10	66.46	12.15%
Finance costs	62.06	56.54	5.52	9.76%
Depreciation and amortisation expenses	148.59	110.17	38.42	34.87%
Other expenses	1,440.27	1,545.19	(104.92)	(6.79%)
<b>Total expenses</b>	<b>5,334.31</b>	<b>5,534.49</b>	<b>(200.18)</b>	<b>(3.62%)</b>
<b>Profit / (Loss) before tax</b>	<b>2,535.38</b>	<b>5,079.49</b>	<b>(2,544.11)</b>	<b>(50.09%)</b>
Net Tax expense	665.30	1,258.69	(593.39)	(47.14%)
<b>Profit / (Loss) for the year</b>	<b>1,870.08</b>	<b>3,820.80</b>	<b>(1,950.72)</b>	<b>(51.06%)</b>

**Total Income**

Our total income has decreased by 25.86% to ₹7,869.69 Lakhs in Financial Year ended March 31, 2024 from ₹ 10,613.98 Lakhs in Financial Year ended March 31, 2023 primarily due to overall decrease in the revenue from operations and other income.

**Revenue from Operations**

Revenue from operations comprises of

- Sale of products includes sale of Caffeine Anhydrous Natural, Green Coffee Bean Extract, and Crude Caffeine in Financial Year ended March 31, 2024 and March 31, 2023.
- The sale of products decreased by 25.23% from ₹10,267.15 Lakhs in financial year 2023 to ₹7,676.61 lakhs in Financial Year 2024.
- The Company’s sale of Caffeine Anhydrous Natural decreased from ₹9,416.71 Lakhs in financial year 2023 to ₹6,975.51 lakhs in Financial Year 2024. This decline in sales is attributed to a reduction in sales volume, primarily caused by lower production resulting from delays in the delivery of key raw materials.
- The Company’s sale of Green Coffee Bean Extract decreased from ₹732.33 Lakhs in financial year 2023 to ₹574.23 lakhs in Financial Year 2024. The decrease was due to lower demand from customers.
- The Company’s sale of Crude Caffeine increased from ₹118.11 Lakhs in financial year 2023 to ₹126.87 lakhs in Financial Year 2024.
- Sale of traded goods includes herbal products, decreased by 7.84% to 131.55 Lakhs in Financial Year ended March 31, 2024 from ₹ 142.74 Lakhs in Financial Year ended March 31, 2023.
- Other operating revenue is Nil in Financial Year ended March 31, 2024 as compared to ₹ 2.89 Lakhs in Financial Year ended March 31, 2023.

## Other Income

Our other income decreased by 68.03% to ₹72.00 Lakhs in Financial Year ended March 31, 2024 as compared to ₹ 225.18 lakhs in Financial Year ended March 31, 2023, which is primarily because of decrease in foreign exchange gain by ₹166.07 lakhs.

- II. Under the heading “Results of Operations Information for the financial year ended March 31, 2023 compared with financial year ended March 31, 2022” in the chapter “MANAGEMENT’S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS” beginning on page 228 of the Draft red herring Prospectus shall be updated to reflect as under.

## RESULTS OF OPERATIONS INFORMATION FOR THE FINANCIAL YEAR ENDED MARCH 31, 2023 COMPARED WITH FINANCIAL YEAR ENDED MARCH 31, 2022

Particulars	Financial Year ended March 31, 2023 (₹ in Lakhs)	Financial Year ended March 31, 2022 (₹ in Lakhs)	Change in ₹ Lakhs	Change in %
<b>Income</b>				
Revenue from operations(Net)	10,388.80	5,795.17	4,593.63	79.27%
Other income	225.18	99.06	126.12	127.32%
<b>Total Income</b>	<b>10,613.98</b>	<b>5,894.23</b>	<b>4,719.75</b>	<b>80.07%</b>
<b>Expenses</b>				
Cost of materials consumed	3,519.15	2,444.28	1,074.87	43.97%
Purchases of stock-in-trade	99.16	144.47	(45.31)	(31.36%)
Changes in inventories of finished goods, work-in-progress and stock-in-trade	(342.82)	(211.17)	(131.65)	62.34%
Employee benefits expenses	547.10	419.54	127.56	30.40%
Finance costs	56.54	150.35	(93.81)	(62.39%)
Depreciation and amortisation expenses	110.17	86.48	23.69	27.39%
Other expenses	1,545.19	1,284.42	260.77	20.30%
<b>Total expenses</b>	<b>5,534.49</b>	<b>4,318.37</b>	<b>1,216.12</b>	<b>28.16%</b>
<b>Profit / (Loss) before tax</b>	<b>5,079.49</b>	<b>1,575.86</b>	<b>3,503.63</b>	<b>222.33%</b>
Net Tax expense	1,258.69	473.71	784.98	165.71%
<b>Profit / (Loss) for the year</b>	<b>3,820.80</b>	<b>1,102.15</b>	<b>2,718.65</b>	<b>246.67%</b>

## Total Income

Our total income has increased by 80.07% to ₹ 10,613.98388.80 Lakhs in Financial Year ended March 31, 2023 from ₹ 5,795.175,894.23 Lakhs in Financial Year ended March 31, 2022 primarily due to an increase in revenue from operations by ₹ 4,593.63 Lakhs and increase in other income by ₹ 126.12 Lakhs.

## Revenue from Operations

Revenue from operations comprises of

- Sale of products includes sale of Caffeine Anhydrous Natural, Green Coffee Bean Extract, and Crude Caffeine in Financial Year ended March 31, 2023 and March 31, 2022.
- The sale of products increased by 82.46% to ₹10,267.15 Lakhs in financial year 2023 from ₹5,627.20 lakhs in Financial Year 2023.
- The Company’s sale of Caffeine Anhydrous Natural increased to ₹9,416.71 Lakhs in financial year 2023 from ₹4,534.27 lakhs in Financial Year 2022. This increase was primarily driven by higher realizations, complemented by supportive volume growth.
- The Company’s sale of Green Coffee Bean Extract decreased to ₹732.33 Lakhs in financial year 2023 from ₹976.72 lakhs in Financial Year 2022. The decline in sales was attributed to reduced customer demand.
- The Company’s sale of Crude Caffeine increased from ₹116.21 Lakhs in financial year 2022 to ₹118.11lakhs in Financial Year 2023.
- Sale of traded goods includes herbal products, decrease by 11.16% to 142.74 Lakhs in Financial Year ended March 31, 2023 from ₹ 160.67 Lakhs in Financial Year ended March 31, 2022.

- Other Operating revenue decreased by 82.52 % to ₹ 2.89 Lakhs in Financial Year ended March 31,2023 from ₹ 16.53 Lakhs in Financial Year ended March 31, 2022.

#### Other Income

Our other income increased by 127.32% to ₹ 225.18 Lakhs in Financial Year ended March 31, 2023 from ₹ 99.06 Lakhs in Financial Year ended March 31, 2022, mainly due to increase in foreign exchange difference amounting to ₹108.00 Lakhs The increase in foreign exchange difference was majorly due to favorable movement in Dollar value in Financial Year ended March 31, 2022.

- III. Addition of new heading “*Rationale for fluctuating PAT margin of the Company*” above the heading “Financial Indebtedness” in the chapter “MANAGEMENT’S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS” beginning on page 237 of the Draft red herring Prospectus shall be added to reflect as under.

Rationale for fluctuating PAT margin of the Company is as follow:

(₹ in Lakhs)

Particulars	Financial Year ended March 31, 2024(Consolidated)	Financial Year ended March 31, 2023(Consolidated)	Financial Year ended March 31, 2022(Standalone)
Financial			
Revenue from Operations (Net) (1)	7,797.69	10,388.90	5,795.17
EBITDA (2)	2,746.03	5,246.20	1,812.69
EBITDA Margin (3) (in %)	35.17%	50.38%	31.23%
Net Profit after tax (4)	1,870.08	3,820.8	1,102.15
Net Profit Margin (5) (in %)	23.95%	36.69%	18.99%

Decrease in FY 2024 Compared to FY 2023:

- **Revenue Decline:** Revenue from operations (Net) decreased by 24.941% due to lower production levels of Caffeine Anhydrous Natural.
- **Rising Raw Material Costs:** The increase in raw material prices outpaced the rise in product realizations, compressing margins.
- **Volume Decline:** A significant 33.06% decrease in the volume of Caffeine Anhydrous Natural sold impacted revenue and profitability.
- **Increased Depreciation:** Higher investments in plant and machinery led to increased depreciation expenses, further affecting margins.

These factors resulted in decline of both EBITDA and PAT Margin, resulting the fluctuation in margins

Increase in FY 2023 Compared to FY 2022:

- **Significant Revenue Growth:** Revenue from operations (Net) increased by 79.27%, largely driven by enhanced market demand.
- **Higher Realization:** The realization for Caffeine Anhydrous Natural increased by 79.61% and for GCE 38.54%
- **Volume Growth:** Achieved a 15.63% increase in the volume of Caffeine Anhydrous Natural sold.
- **Operational Efficiency:** These factors collectively contributed to improved operational efficiency, resulting in an expansion of both EBITDA and PAT margins.

## GOVERNMENT AND OTHER APPROVALS

- I. Under the heading “II. APPROVALS OBTAINED BY OUR COMPANY IN RELATION TO OUR BUSINESS AND OPERATION” in the chapter “GOVERNMENT AND OTHER APPROVALS” beginning on page 249 of the Draft red herring Prospectus shall be updated to reflect as under.

### C. Labour Law Related & Other Approvals

S. No	Nature of Registration/License	Registration/License/Certificate No.	Applicable Laws	Issuing Authority	Date of Expiry
<b>Other Approvals</b>					
1.	Boiler Use Certificate for E-94, RIICO Industrial Area, Bagru, Sanganer, Jaipur - 303007, Rajasthan	Registry No. of Boiler RJ-3345	Section 7/8 of the Boilers Act No. V of 1923	Rajasthan State Boiler Inspection Department	September 14, 2025
2.	Boiler Use Certificate for E-94, RIICO Industrial Area, Bagru, Sanganer, Jaipur - 303007, Rajasthan	Registry No. of Boiler RJ-966	Section 7/8 of the Boilers Act No. V of 1923	Rajasthan State Boiler Inspection Department	September 10, 2025
3	No Objection Certificate/ Approval from the Chief Fire Officer	LSG/JAIPUR GREATER/FIREN OC/2023-24/26700	Rajasthan Municipalities Act, 2009	Chief Fire Officer, Municipal Corporation, Jaipur Greater	March 06, 2025
4	Certificate of Verification	Certificate No. 276943	Legal Metrology Act, 2009	Legal Metrology Department, Government of Rajasthan	April 30, 2025
5	FSSAI License as Manufacturer- for substances added to Food	12222999000306	Food Safety and Standards Act, 2006	Food Safety and Standards Authority of India, Government of India	May 30, 2027
6	Entitlement Certificate for Subsidy	RIPS -00008852-5481	Rajasthan Investment Promotion Scheme, 2014	District Industries Center, Jaipur Rural	August 17, 2027
7	Entitlement Certificate for Exemption from Electricity Duty	RIPS -00008851-5482	Rajasthan Investment Promotion Scheme, 2014	District Industries Center, Jaipur Rural	August 17, 2027
8	Drug License for manufacture of sale or distribution of drugs named Caffeine Anhydrous IP/BP/USP	Raj-2445	Drugs and Cosmetics Act, 1940	Drug Control Organisation, Government of Rajasthan	April 11, 2028
9	Sanstha Aadhaar Number	8005210019000008	Department of Statistics, Directorate of Economics & Statistics Rajasthan, Jaipur	Directorate of Economics & Statistics, Rajasthan	Valid till cancelled
10	Certificate of Building Stability for Factory at E-94, RIICO Industrial Area, Bagru, Sanganer, Jaipur - 303007, Rajasthan	-	Factories Act, 1948	Bidadhar & Techno Associates	Valid till cancelled.
11	Certificate of Registration under Udyam Aadhar	UDYAM-RJ-17-0284588	Micro, Small and Medium Enterprises Development Act, 2006	Ministry of Micro, Small and Medium Enterprises	Valid till cancelled

## D. Certifications

S. No.	Nature of Certification/Issuing Authority	Registration/License No.	Issuing Authority	Date of Expiry
<b>Certifications</b>				
1.	Halal Product Certificate for Caffeine Anhydrous Natural from Coffee and Tea, Green Coffee Bean Extract, Garcinia, Boswellia Extract, Senna Extract & White Kidney Bean Extract, Curcumin Extract, etc.	S Reg. No. : IPC1136 Rnwl.: 23-25/07-2y-NF.	Halal Certification Services India Pvt. Ltd.	August 27, 2025
2.	HACCP's Certificate of Registration for Manufacture & Export of Caffeine Anhydrous Natural and Green Coffee Bean Extract, etc.	HACCP/RE/1367	Head of Certification, Bureau of International Quality Standards	December 02, 2025
3.	World Health Organisation Good Manufacturing Practices for Manufacture & Export of Caffeine Anhydrous Natural and Green Coffee Bean Extract, etc.	GMP/RE/1366	Head of Certification, Bureau of International Quality Standards	December 02, 2025
4.	ISO 22000:2018 (Food Safety Management System) for Manufacturing of Plant Herbal Extracts Like Natural Caffeine, Senna Extract, Turmeric Extract, White Kidney Bean Extract, etc.	M/IN- FC225119	Certification Manager, MAP Certification Pvt. Ltd.	March 13, 2026
5.	ISO 45001:2018 (Occupational Health & Safety Management System) for Manufacturing of Plant Herbal Extracts Like Natural Caffeine, Senna Extract, Turmeric Extract, White Kidney Bean Extract, etc.	M/IN- OC225118	Certification Manager, MAP Certification Pvt. Ltd.	March 13, 2026
6.	ISO 14001:2015 (Environment Management System) for Manufacturing of Plant Herbal Extracts Like Natural Caffeine, Senna Extract, Turmeric Extract, White Kidney Bean Extract, etc.	M/IN- EC225117	Certification Manager, MAP Certification Pvt. Ltd.	March 13, 2026
7.	ISO 9001:2015 (Quality Management System) for Manufacturing of Plant Herbal Extracts Like Natural Caffeine, Senna Extract, Turmeric Extract, White Kidney Bean Extract, etc.	M/IN- QG235014	Certification Manager, MAP Certification Pvt. Ltd.	July 16, 2026
8.	Legal Entity Identifier	98450039UD5FB3F40833	LEI Register India Private Limited	November 16, 2025

## II. Under the heading “III. MATERIAL LICENSES/APPROVALS FOR WHICH OUR COMPANY HAS APPLIED FOR” in the chapter “GOVERNMENT AND OTHER APPROVALS” beginning on page 251 of the Draft red herring Prospectus shall be updated to reflect as under.

The Company has made following applications under the Rajasthan Shops and Commercial Establishments Act, 1958 for obtaining the ‘Shops and Establishment Licenses’ for its warehouses:

- i. Application No. SCA/2024/14/135593 dated October 12, 2024 (for warehouse at Chirota Bagru RIICO, Rajdharam Filling Petrol Pump Ka Pass Dis., Jaipur).
- ii. Application No. SCA/2024/14/135615 dated October 15, 2024 (for warehouse at Khasra No 585/42, Gram Chirota, Panchayat Ajay rajpura Sanganer, Jaipur); and
- iii. Application No. SCA/2024/14/135616 dated October 15, 2024 (for warehouse at Khasra No 237/1, 240/3, 242/1 Gram Chirota, Panchayat Ajay rajpura Sanganer, Jaipur).



## OTHER REGULATORY AND STATUTORY DISCLOSURES

Under the heading “*Eligibility for the offer*” in the chapter “OTHER REGULATORY AND STATUTORY DISCLOSURES” beginning on page 254 of the Draft red herring Prospectus shall be updated to reflect as under:

### ELIGIBILITY FOR THE OFFER

Our Company is eligible for the Offer in accordance with Regulation 229(2) and other provisions of Chapter IX of the SEBI (ICDR) Regulations, as we are an Offer whose post-offer face value capital will be more than ₹ 10 Crore but less than ₹ 25 Crore, and we propose to list the same on the Small and Medium Enterprise Exchange (“**SME Exchange**”), in this case being the Emerge Platform of NSE India Limited. Further, our Company satisfies track record and/or other eligibility conditions of Emerge Platform of NSE India Limited.

- The Company is incorporated under the Companies Act, 1956 in India.
- The Paid-up Capital of the Company is ₹1912.65 Lakh comprising 1,91,26,500 Equity shares. The Post Issue Paid up Capital (Face Value) of the company will be ₹2333.05 Lakh comprising 2,33,30,500\* Equity Shares. So, the company has fulfilled the criteria of Post issue paid up capital of the company (face value) shall not being more than ₹.2500 Lakhs.
- The Company has a track record of at least 3 years on date.
- Company confirms that it has positive Free cash flow to Equity (FCFE) for at least 2 out of 3 financial years preceding the application and the details are mentioned below:

(in lakhs)

Particulars	March 31, 2024	March 31, 2023	March 31, 2022
Net Cash Flow from Operating Activities	569.72	2,018.45	1,435.92
Purchase of Property, Plant and Equipment	(1,784.25)	(962.06)	(594.72)
Sale of Property, Plant and Equipment	14.28	-	10.50
(Repayment of)/Proceeds from Long Term Borrowings	(84.67)	(64.11)	(259.81)
(Repayment of)/Proceeds from Short Term Borrowings	1,124.91	(229.64)	(380.99)
Interest Paid	(62.07)	(56.54)	(150.35)
Less: Tax Rate on Interest Paid	16.29	14.01	45.20
FCFE	(205.79)	720.11	105.75

- The Company confirms that it has operating profit (earnings before interest, depreciation and tax from operations for at least any two (2) out of three (3) financial years preceding the application and its net-worth as on March 31 2024 as per Restated Financial Statements is positive and the details are mentioned as below

(in lakhs)

Particulars	March 31, 2024	March 31, 2023	March 31, 2022
Net worth	8392.55	6522.47	2701.67
Operating Profit (Earnings before Interest, depreciation and tax)	2746.03	5246.20	1812.69

- As per Restated Financial Statement, the net-worth of the Company is Rs.8392.55 lakhs as on March 31, 2024
- The Company had not been referred to erstwhile Board for Industrial and Financial Reconstruction (BIFR) and no proceedings have been admitted under Insolvency and Bankruptcy Code against the Issuer and Promoting companies
- The Company has not received any winding up petition admitted by any National Company Law Tribunal or any court.
- No material regulatory or disciplinary action by a stock exchange or regulatory authority in the past three years against the Company
- The merchant banker involved in the IPO (in this case being Srujan Alpha Capital Advisors LLP) does not have instances of any of their IPO draft offer document filed with the Exchange being returned in the past 6 months from the date of application.

## DECLARATION

I hereby certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines offered by the Government of India or the rules, or the regulations or guidelines offered by Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act, 1992 as the case may be, have been complied with and no statement made in this Addendum to Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, and the Securities and Exchange Board of India Act, 1992, each as amended or the rules, regulations or guidelines offered thereunder, as the case may be. I further certify that all the disclosures and statements made in this Addendum to Draft Red Herring Prospectus are true and correct.

### SIGNED BY THE DIRECTORS OF OUR COMPANY

Sd/-

---

**MR. NEMI CHAND JAIN**

*Managing Director*

*DIN: 00434383*

**Date:** November 12, 2024

**Place:** Jaipur

## DECLARATION

I hereby certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines offered by the Government of India or the rules, or the regulations or guidelines offered by Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act, 1992 as the case may be, have been complied with and no statement made in this Addendum to Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, and the Securities and Exchange Board of India Act, 1992, each as amended or the rules, regulations or guidelines offered thereunder, as the case may be. I further certify that all the disclosures and statements made in this Addendum to Draft Red Herring Prospectus are true and correct.

### SIGNED BY THE DIRECTORS OF OUR COMPANY

Sd/-

---

**MRS. SUMITRA JAIN**  
*Non-Executive Director*  
DIN: 00614391

**Date:** November 12, 2024  
**Place:** Jaipur

## DECLARATION

I hereby certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines offered by the Government of India or the rules, or the regulations or guidelines offered by Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act, 1992 as the case may be, have been complied with and no statement made in this Addendum to Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, and the Securities and Exchange Board of India Act, 1992, each as amended or the rules, regulations or guidelines offered thereunder, as the case may be. I further certify that all the disclosures and statements made in this Addendum to Draft Red Herring Prospectus are true and correct.

### SIGNED BY THE DIRECTORS AND CFO OF OUR COMPANY

Sd/-

---

**MR. AMIT KUMAR JAIN**  
*Whole Time Director & CFO*  
DIN: 00434515

**Date:** November 12, 2024

**Place:** Jaipur

## DECLARATION

I hereby certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines offered by the Government of India or the rules, or the regulations or guidelines offered by Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act, 1992 as the case may be, have been complied with and no statement made in this Addendum to Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, and the Securities and Exchange Board of India Act, 1992, each as amended or the rules, regulations or guidelines offered thereunder, as the case may be. I further certify that all the disclosures and statements made in this Addendum to Draft Red Herring Prospectus are true and correct.

### SIGNED BY THE DIRECTORS OF OUR COMPANY

Sd/-

---

**MR. DIPAK KUMAR JAIN**

*Whole Time Director*

*DIN: 01217721*

**Date:** November 12, 2024

**Place:** Jaipur

## DECLARATION

I hereby certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines offered by the Government of India or the rules, or the regulations or guidelines offered by Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act, 1992 as the case may be, have been complied with and no statement made in this Addendum to Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, and the Securities and Exchange Board of India Act, 1992, each as amended or the rules, regulations or guidelines offered thereunder, as the case may be. I further certify that all the disclosures and statements made in this Addendum to Draft Red Herring Prospectus are true and correct.

### SIGNED BY THE DIRECTORS OF OUR COMPANY

Sd/-

---

**MR. OM PRAKASH BANSAL**  
*Independent Director*  
*DIN: 00440540*

**Date:** November 12, 2024

**Place:** Jaipur

## DECLARATION

I hereby certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines offered by the Government of India or the rules, or the regulations or guidelines offered by Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act, 1992 as the case may be, have been complied with and no statement made in this Addendum to Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, and the Securities and Exchange Board of India Act, 1992, each as amended or the rules, regulations or guidelines offered thereunder, as the case may be. I further certify that all the disclosures and statements made in this Addendum to Draft Red Herring Prospectus are true and correct.

### SIGNED BY THE DIRECTORS OF OUR COMPANY

Sd/-

---

**MR. RAKESH KUMAR**

*Independent Director*

*DIN: 03172592*

**Date:** November 12, 2024

**Place:** Jaipur

## DECLARATION

I hereby certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines offered by the Government of India or the rules, or the regulations or guidelines offered by Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act, 1992 as the case may be, have been complied with and no statement made in this Addendum to Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, and the Securities and Exchange Board of India Act, 1992, each as amended or the rules, regulations or guidelines offered thereunder, as the case may be. I further certify that all the disclosures and statements made in this Addendum to Draft Red Herring Prospectus are true and correct.

### SIGNED BY THE DIRECTORS OF OUR COMPANY

Sd/-

---

**MR. MANOJ MAHESHWARI**

*Independent Director*

*DIN: 00004668*

**Date:** November 12, 2024

**Place:** Jaipur



## DECLARATION

I hereby certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines offered by the Government of India or the rules, or the regulations or guidelines offered by Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act, 1992 as the case may be, have been complied with and no statement made in this Addendum to Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, and the Securities and Exchange Board of India Act, 1992, each as amended or the rules, regulations or guidelines offered thereunder, as the case may be. I further certify that all the disclosures and statements made in this Addendum to Draft Red Herring Prospectus are true and correct.

### SIGNED BY THE DIRECTORS OF OUR COMPANY

Sd/-

---

**MR. VED PRAKASH SUJAKA**

*Independent Director*

*DIN: 07988348*

**Date:** November 12, 2024

**Place:** Jaipur

## DECLARATION

I hereby certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines offered by the Government of India or the rules, or the regulations or guidelines offered by Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act, 1992 as the case may be, have been complied with and no statement made in this Addendum to Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, and the Securities and Exchange Board of India Act, 1992, each as amended or the rules, regulations or guidelines offered thereunder, as the case may be. I further certify that all the disclosures and statements made in this Addendum to Draft Red Herring Prospectus are true and correct.

**SIGNED BY THE COMPANY SECRETARY & COMPLIANCE OFFICER OF OUR COMPANY**

Sd/-

---

**MS. AAYUSHI JAIN**  
*Company Secretary & Compliance Officer*  
PAN: BBZPJ5190D

**Date:** November 12, 2024

**Place:** Jaipur