



CS Dhanya Paul M.Com, FCS

CS Vivek Kumar M.Com, LL.B, FCS

The Chief General Manager
Listing Operation,
BSE Limited,
20th Floor, P. J. Towers, Dalal Street,
Mumbai – 400 001.

Dear Sir,

Sub: Application for “In-principle approval” prior to issue and allotment of 77,32,500 equity shares having face value of ₹ 10 each on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

I, Vivek Kumar, Company Secretary in Practice having Membership No. F9353 and CoP 11036, has verified the relevant records and documents of Supra Pacific Financial Services Limited (Formerly Supra Pacific Management Consultancy Limited) (the Company) (CIN: L74140MH1986PLC039547) with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

- a) None of the proposed allottee(s) has/ have sold any equity shares of the company during the 90 trading days preceding the relevant date. Further, where the proposed allottee(s) is/ are promoter/ promoter group entity, then none of entities in the promoter and promoter group entities has/ have sold any equity share of the company during the 90 trading days preceding the relevant date.
- b) Except as specifically mentioned below, the following proposed allottees does not hold any equity shares of the issuer for a period starting from the relevant date till the date of preferential allotment.



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Sr No	Name of the Proposed Allottee(s)	PAN	Category	No. of Equity Shares	% of pre preferential issue capital	No. of Equity Shares	% of post preferential issue capital
				(Pre issue)		(Post issue)	
1	Sarath Kumar S	BAVPK3371A	Public	0	0%	25000	0.1216%
2	Ajay Krishna	EPOPA5130N	Public	0	0%	25000	0.1216%
3	Manoj Kumar N.B	BCEPN7415H	Public	0	0%	35000	0.1702%
4	Abbas A.M	ALPPA0905Q	Public	0	0%	25000	0.1216%
5	Sajitha K.P	BCOPP9490E	Public	0	0%	50000	0.2432%
6	Sara Thobias	BPXPK5217C	Public	0	0%	25000	0.1216%
7	Abdulsalam V.M	AKLPA2670F	Public	105	0.0008%	80105	0.3896%
8	Usha Rajan	AJBPR8642R	Public	41176	0.321%	106176	0.5164%
9	C.Ranjith Kumar	ALWPR1020J	Public	0	0%	75000	0.3648%
10	Salija Variyath	AFTP7565F	Public	1590	0.0124%	76590	0.3725%
11	Ramakrishnan P.C	AKKPR8251L	Public	0	0%	57500	0.2796%
12	Jayan V.S	ACJPJ6450C	Public	21978	0.1713%	46978	0.2285%
13	Jitha Stalin	DDFPS0905D	Public	0	0%	50000	0.2432%
14	Tomin Pius P	ANAP75279R	Public	0	0%	25000	0.1216%
15	Manoj Kumar R	ANFPP8080P	Public	35	0.0003%	52535	0.2555%
16	Sanjay Moses	BLZPS9201A	Public	0	0%	60000	0.2918%
17	Ajith Kumar Paleri	AFLPP0086M	Public	0	0%	150000	0.7295%
18	Muralidharan V	ABJPV0793R	Public	0	0%	25000	0.1216%
19	Anjumol Joy	AOWPJ5558A	Public	0	0%	55000	0.2675%
20	Suresh P	BVJPS6914E	Public	0	0%	50000	0.2432%
21	Aparna P	AIOPA0387N	Public	0	0%	55000	0.2675%
22	Thanappan V	AEYPP2037G	Public	0	0%	50000	0.2432%
23	Sini V	HDGPS1730H	Public	0	0%	50000	0.2432%
24	Elizabeth George	ATEPG8520A	Public	0	0%	65000	0.3161%
25	Sunny O.D	BQWPS2837Q	Public	7821	0.0610%	82821	0.4028%
26	Lissy Adai	AHBPL7793F	Public	0	0%	55000	0.2675%
27	Saji S	CCTPS4797M	Public	1	0.0000%	165001	0.8025%
28	Jithesh V	AGZPJ3461B	Public	33	0.0003%	160033	0.7783%
29	Muhasin T.A	AEMPM3926K	Public	0	0%	50000	0.2432%
30	Firoz Yoosaf	ACXPY6897L	Public	0	0%	150000	0.7295%
31	Krishnaprasad G	AODPG5320E	Public	0	0%	75000	0.3648%
32	Abhilash Kc	AUXPA0437A	Public	0	0%	50000	0.2432%
33	Elizabeth John	AGTPJ3921C	Public	0	0%	25000	0.1216%
34	Felix Chacko	AKXPK5619A	Public	0	0%	50000	0.2432%
35	George. P.R	ACYPG8704H	Public	0	0%	50000	0.2432%
36	Grigarin Wilson	AXXPG2658J	Public	3000	0.0234%	103000	0.5009%
37	Jaya Kumari B	AGXPJ4543Q	Public	0	0%	25000	0.1216%
38	Manoj P Thomas	ACKPT1733F	Public	3296	0.0257%	78296	0.3808%
39	Raji Prasad D	AHUPD0798H	Public	0	0%	100000	0.4863%
40	Sandeep Kumar E.S	GQYPS5109G	Public	0	0%	25000	0.1216%



41	Savitha P Raphael	CKFPS8293E	Public	3296	0.0257%	78296	0.3808%
42	Shafeeq H	EGQPS6991N	Public	90	0.0007%	50090	0.2436%
43	Shyju John	BQLPS0789N	Public	0	0%	100000	0.4863%
44	Sindhu. T	ADFPT5901K	Public	0	0%	100000	0.4863%
45	Smitha V Mohan	BKSPM5016P	Public	0	0%	50000	0.2432%
46	Sudhina Vs	BNDPS8500A	Public	0	0%	100000	0.4863%
47	Sunilkumar K K	ANTPK8691H	Public	0	0%	25000	0.1216%
48	Tina Anotny	APKPT1776P	Public	0	0%	100000	0.4863%
49	Vasudevan N D	AIGPD3582N	Public	0	0%	50000	0.2432%
50	Vinod Kumar S	AFBPV4396Q	Public	0	0%	50000	0.2432%
51	Aneesh S	CBDPA7488J	Public	0	0%	50000	0.2432%
52	Arun Manikandan	CMBPM5077N	Public	0	0%	50000	0.2432%
53	Clinton Pullomkulam	EGUPP8857C	Public	0	0%	50000	0.2432%
54	Praveen O R	CCZPP5578F	Public	0	0%	100000	0.4863%
55	Sebastian	GZEPS9229E	Public	0	0%	25000	0.1216%
56	Joby George	AGOPJ1913F	Promoter	799393	6.2312%	1849393	8.9945%
57	Manoj K	AJSPK2725M	Public	13186	0.1028%	288186	1.4016%
58	Radhika P	EQZPP2880J	Public	0	0%	225000	1.0943%
59	Abidh Abubakkar	AMQPA2093P	Public	77853	0.6069%	452853	2.2024%
60	Dr Ashna B R	BHFPR3650E	Public	0	0%	125000	0.6079%
61	Sandeep Babu T	BNAPS8734D	Promoter	46948	0.3660%	321948	1.5658%
62	Manju John	ENUPM7267L	Public	0	0%	225000	1.0943%
63	Manoj Kumar T	AQQPT9513M	Public	0	0%	100000	0.4863%
64	Boban S	BCXPS9276E	Public	0	0%	55000	0.2675%
65	Abhilash S L	AFZPL5752L	Public	0	0%	80000	0.3891%
66	Binu Alappat	ALBPB0336L	Public	0	0%	50000	0.2432%
67	Annliya C Soju	OWRPS2606R	Public	0	0%	50000	0.2432%
68	Sudeep Sathyan	DSTPS8860L	Public	0	0%	50000	0.2432%
69	Joseph T.A	ACPPJ7825D	Public	0	0%	50000	0.2432%
70	Chandrika	BEOPC7912N	Public	0	0%	50000	0.2432%
71	Baburajan P.G	ADNPB6213A	Public	0	0%	50000	0.2432%
72	Janardhanan P.S	ANKPJ0010G	Public	0	0%	50000	0.2432%
73	K.L Swarna	AJEPS3768E	Public	0	0%	50000	0.2432%
74	Bimsy C.B	AJXPB3218K	Public	0	0%	50000	0.2432%
75	Jose P.J	ABIPJ7557Q	Public	0	0%	50000	0.2432%
76	Simon P	CFPPP2375K	Public	0	0%	50000	0.2432%
77	Narayana Pillai M	AFJPP8567R	Public	0	0%	50000	0.2432%
78	Annie A.I	ACPPA2048H	Public	0	0%	50000	0.2432%
79	Gracy Anto	ACZPG9494M	Public	0	0%	50000	0.2432%
80	Anuradha K.A	CFTPA8335N	Public	0	0%	50000	0.2432%
81	V G Chacko	ADGPG3754Q	Public	0	0%	50000	0.2432%
82	Shajimon G	BCTPG3410Q	Public	0	0%	50000	0.2432%
83	Sukumaran P	AFAPS6129K	Public	0	0%	50000	0.2432%
84	Sreekrishnan P.N	AJXPS0432L	Public	0	0%	60000	0.2918%
85	Abdul Jabbar	AHAPV0730H	Public	0	0%	125000	0.6079%



86	Alexander George	ACYPG8784B	Public	0	0%	50000	0.2432%
87	Martin George	BOLPG4138R	Public	0	0%	50000	0.2432%
88	Vinuraj	ADBPV1111F	Public	1000	0.0078%	51000	0.2480%
89	Jose K.T	ADEPJ3345G	Public	0	0%	50000	0.2432%
90	Sona Jose	ADVPJ3585H	Public	0	0%	50000	0.2432%
91	Darly Varghese & Varghese Skariah	AJKPD8593J, ACUPS4945A	Public	0	0%	25000	0.1216%
92	Binu Alappat A	AFXPA9294C	Public	0	0%	50000	0.2432%
93	Gopa Kumar	AQXPG7330G	Public	0	0%	25000	0.1216%
94	Mary Babu	BBIPB3242H	Public	0	0%	57500	0.2796%

c) The pre-preferential shareholding of each of proposed allottee(s) has been locked in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018. Further, there is no sale/pledge of pre-preferential holding from 13.04.2023 till 27.08.2023. The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

Name of Proposed Allottee	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
Abdulsalam V.M	13969694	105	12.11.2023	20.03.2024	Nil	Nil
Usha Rajan	03703595	41176	12.11.2023	20.03.2024	Nil	Nil
Salija Variyath	23952666	1590	12.11.2023	20.03.2024	Nil	Nil
Jayan V.S	15013873	21978	12.11.2023	20.03.2024	Nil	Nil
Manoj Kumar R	10624058	35	12.11.2023	20.03.2024	Nil	Nil
Sunny O.D	40941302	7821	12.11.2023	20.03.2024	Nil	Nil
Saji S	11482699	1	12.11.2023	20.03.2024	Nil	Nil
Jithesh V	85040020	33	12.11.2023	20.03.2024	Nil	Nil
Grigarin Wilson	80698552	3000	12.11.2023	20.03.2024	Nil	Nil
Manoj P Thomas	32723986	3296	12.11.2023	20.03.2024	Nil	Nil
Savitha P Raphael	32724293	3296	12.11.2023	20.03.2024	Nil	Nil
Shafeeq H	51258157	90	12.11.2023	20.03.2024	Nil	Nil
Joby George	00011208	799393	12.11.2023	20.03.2024	Nil	Nil
Manoj K	00771174	13186	12.11.2023	20.03.2024	Nil	Nil
Abidh Abubakkar	10327384	77853	12.11.2023	20.03.2024	Nil	Nil
Sandeep Babu T	11259352	46948	12.11.2023	20.03.2024	Nil	Nil
Vinuraj	02982440	1000	12.11.2023	20.03.2024	Nil	Nil

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

d) None of the proposed allottees belonging to promoter(s) or the promoter group is ineligible for allotment in terms of Regulations 159 of SEBI (ICDR) Regulations, 2018.

e) The proposed issue is being made in accordance with the requirements of Chapter V of SEBI (Issue of Capital and Disclosure Requirement) Regulations, 2018, Section 42 and 62 of the



Companies Act 2013 and Rule 14 of the Companies (Prospectus and Allotment of Securities) Rules, 2014 and other requirements of Companies Act, 2013. Further, the company has complied with all legal and statutory formalities and no statutory authority has restrained the company from issuing these proposed securities.

- f) The proposed preferential issue is being made in compliance with the provisions of Memorandum of Association (MoA) and Article of Association (AoA) of the company. It is further confirmed that for the proposed preferential issue, the price of the equity shares of the company has been determined in compliance with the valuation requirement as mentioned in the AoA of the company.
- g) The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e. 2023-24 is more than 5% of the post issue fully diluted share capital of the issuer.

OR

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

For DV & Associates

CS Vivek Kumar
Partner
M. No. F9353, CoP 11036
UDIN: F009353E000968553



Ernakulam
07th September, 2023