

**Annexure IV**

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 1,37,00,000 (One Crore Thirty-Seven Lakh) Convertible Warrants on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

I, Mr. Ricky Kapadia, Proprietor of M/s. RPK & Associates, (COP: 26790), Practicing Company Secretary, have verified the relevant records and documents of **Dev Labtech Venture Limited** with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

- None of the proposed allottees have sold any equity shares of the company during the 90 trading days preceding the relevant date. Further, none of entities in the promoter and promoter group entities have sold any equity share of the company during the 90 trading days preceding the relevant date.
- Except 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.

Sr. No.	Name of the Proposed Allottees
1	Donda Jerambhai Lavjibhai
2	Donda Labhuben Jerambhai
3	Jaykumar J Donda
4	Donda Jerambhai Lavjibhai HUF
5	Sachin Madhusudan Chhatre

- The pre-preferential shareholding of each of proposed allottee(s) has been locked in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018. Further, there is no sale/ pledge of pre-preferential holding from Relevant Date i.e. 6th October, 2026 till date of lock-in i.e. 31st May, 2027. The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:





Address: 307, Shubham Complex, Por Mohallo, Opp. Anand Hospital, Near Kailash Restaurant, Nanpura, Surat-395001, Gujarat, E-mail: csrpkandassociates@gmail.com, Mo. No.: +91 9909244224

Name of Proposed Allottees	DP ID	Pre-preferential holding	Lock-in details *		Pledged with	Pledge end date
			From	To		
Donda Jerambhai Lavjibhai	1301240002394705	8,00,000 #	19/03/2025	31/05/2027	N.A.	N.A.
		86,75,960 *	06/10/2026	31/05/2027	N.A.	N.A.
Donda Labhuben Jerambhai	1301240002444312	8,00,000 #	19/03/2025	31/05/2027	N.A.	N.A.
		79,90,512 *	06/10/2026	31/05/2027	N.A.	N.A.
Jaykumar J Donda	1301240002530389	8,00,000 @	24/07/2025	31/05/2027	N.A.	N.A.
		53,15,912 *	06/10/2026	31/05/2027	N.A.	N.A.
Donda Jerambhai Lavjibhai HUF	IN30154966004203	8,00,000 \$	04/08/2025	31/05/2027	N.A.	N.A.
		4,56,752 *	06/10/2026	31/05/2027	N.A.	N.A.
Vanrajsinh Boghubha Sarvaiya	IN30199111434310	0	N.A.	N.A.	N.A.	N.A.
Rajendrasinh Hathisinh Sarvaiya	IN30199111434328	0	N.A.	N.A.	N.A.	N.A.
Sachin Madhusudan Chhatre	IN30051387486557	20,000 *	06/10/2026	31/05/2027	N.A.	N.A.

Equity shares were already under lock in from 19/03/2025 till 30/10/2026. The Company has applied to the respective Depository for the extension of Lock-in of those shares till 31/05/2027.

@ Equity shares were already under lock in from 24/07/2025 till 28/02/2027. The Company has applied to the respective Depository for the extension of Lock-in of those shares till 31/05/2027.

\$ Equity shares were already under lock in from 04/08/2025 till 28/02/2027. The Company has applied to the respective Depository for the extension of Lock-in of those shares till 31/05/2027.

* The Company has initiated Lock-in process of pre-preferential holding of Equity Shares till 31/05/2027.

- 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.





RPK & Associates

Company Secretaries

A Peer Review Firm

Ricky P. Kapadia

(ACS, BBA & Trade Mark Agent)

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- 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. 2026-27 is more than 5% of the post issue fully diluted share capital of the issuer.

For RPK & Associates,

Company Secretaries



RICKY KAPADIA

Proprietor

ACS No.: 60440

COP No.: 26790

Peer Review Cert. No.: 6901/2025

UDIN: A060440H001765649

Date: 07/10/2026

Place: Surat