

PACE E-COMMERCE VENTURES LIMITED

(FORMERLY KNOWN AS PACE E-COMMERCE VENTURES PRIVATE LIMITED)

(PREVIOUSLY KNOWN AS PACE SPORTS AND ENTERTAINMENT PRIVATE LIMITED)

REG. OFFICE: ANUGRAH BUNGLOW, STREET 4, PALLOD FARMS II, SHAMBHU VIHAR SOCIETY,

NANKUDE VASTI , AUNDH , PUNE , MAHARASHTRA - 411045, INDIA

CIN: U51909PN2015PLC156068. | E-mail:- compliance@pacesports.in

Date: 13/08/2024

To,

BSE Limited

Listing Compliance Monitoring Team

P. J. Towers, Dalal Street,

Fort, Mumbai-400001.

Scrip Code: 543637

Sub: Clarification for late submission of Annual Disclosure under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011.

Reference: Email dated 13th August, 2024

Please find enclosed clarification letter for the query raised by Listing Compliance Monitoring Team with respect to late submission of Annual Disclosure under Regulation 31(4) of SEBI (**Substantial Acquisition of Shares and Takeover) Regulation, 2011** as received from the Promoter & Promoters Group of the Company for the year ended on 31st March, 2024, for your kind perusal and records.

Kindly take the note of the same.

Thanking you,

Yours faithfully.

FOR AND ON BEHALF OF,

PACE E-COMMERCE VENTURES LIMITED

(FORMERLY KNOWN AS PACE E-COMMERCE VENTURES PRIVATE LIMITED)

(PREVIOUSLY KNOWN AS PACE SPORTS AND ENTERTAINMENT PRIVATE LIMITED)

NIKITA KANHIYALAL PEDIWAL

COMPANY SECRETARY & COMPLIANCE OFFICER

Enclosure: Clarification Letter from Promoter

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CLARIFICATION LETTER

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Reference: Email dated 13th August, 2024

Respected Sir/ Madam,

We sincerely apologize for the delay in submitting the Annual Disclosure under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011, for the financial year ended 31st March, 2024. The delay was due to an inadvertent oversight on our part and was not intentional.

Furthermore, neither the promoter nor any person acting in concert with the promoter has engaged in any form of encumbrance, whether directly or indirectly, during the financial year. The delay in submitting the disclosure was purely unintentional and did not result from any deliberate action or neglect on our part.

Additionally, this delay has had no material or significant impact on the shareholders of the Company, nor has it affected the market price of the shares of the Company in any adverse way. The integrity and transparency of our operations remain intact, and we assure you that this isolated incident does not reflect our commitment to compliance and regulatory responsibilities.

This is the first instance of such a delay on our part, and we kindly request your understanding and leniency in this matter. We deeply regret the delay and assure you that we will take the necessary steps to prevent such occurrences in the future.

We request you to take the above information on record.

Thanking You,

**For on behalf of all the Promoters and members of the promoter group of
Pace E-Commerce Ventures Limited**

Yours faithfully



**Mr. Shaival Dharmendra Gandhi
(Promoter)**