

# KIDUJA INDIA LIMITED

05<sup>th</sup> March 2024

To,  
**BSE Limited ("BSE")**,  
General Manger - Listing, ISC & CRD  
2nd Floor, New Trading Ring,  
P.J. Towers, Dalal Street,  
Mumbai – 400 001.

**Scrip Code: 507946**

**Scrip Symbol: KIDUJA**

**Sub: Intimation of Letter received from SEBI regarding Condonation of delay in compliance under Regulation 160(f) of SEBI (Issue of Capital and Disclosure Requirements) Regulation 2018.**

Dear Sir/Madam,

This is to inform you that the Company has made an application dated 07<sup>th</sup> December 2023 to Securities and Exchange Board of India ("SEBI") for condonation of delay in compliance under Regulation 160(f) of SEBI (Issue of Capital and Disclosure Requirements) Regulation 2018.

SEBI vide its letter dated 04<sup>th</sup> March 2024 has informed that the said non-compliance is non-substantive and procedural in nature and was within the control of the Company and avoidable and warned the Company to be careful in future and exercise adequate due care so that such lapses to not recure. The said letter was placed before the Board at its meeting held on 05<sup>th</sup> March, 2024 and noted by the Board.

A scan copy of above letter received from SEBI is attached herewith for your reference.

Thanking you,

For **KIDUJA INDIA LIMITED**

**Pooja M. Chavan**  
**Company Secretary & Compliance Officer**

**Encl.: As above**



General Manager  
Corporation Finance Department  
E-mail: [surabhiq@sebi.gov.in](mailto:surabhiq@sebi.gov.in)

SEBI/HO/CFD/SEC-2/P/OW/2024/8422/1  
March 04, 2024

Kiduja India Limited  
127-B, Mittal Tower, Nariman Point,  
Mumbai, Maharashtra, 400021

Kind Attention: - Ms. Pooja Chavan

**Sub- Delay in compliance with Regulation 160(f) of Issue of Capital and Disclosure Requirements Regulations, 2018 (ICDR Regulations, 2018) – Kiduja India Limited (Company)**

1. It was observed that the company, in its meeting held on November 16, 2023, had approved the preferential issue of 6,85,000 convertible equity warrants on private placement basis to promoters and promoters group, subject to the approval of the shareholders of the company.
2. As per Regulation 160(f) of SEBI ICDR Regulations, 2018, the company was required to make an application to BSE for in-principle approval for allotment of warrants on the same day when the notice has been sent in respect of the general meeting seeking shareholders' approval by way of special resolution.
3. It was observed that the provision of Regulation 160(f) of the ICDR Regulations, 2018 was contravened on account of delay in filing the application for in-principle approval to the stock exchange i.e. BSE, where the shares of the Company are listed. The said application was required to be filed on November 22, 2023 i.e. the date of dispatch of the EGM notice. However, the application was made by the company to BSE on November 23, 2023.
4. The company had inter-alia submitted that the delay was mainly on account of delay in getting the pricing certificate from the statutory auditor due to discussion between the company and the management on interpretation of certain clauses of ICDR.
5. It is observed that while the above non-compliance is non-substantive and procedural in nature, it, was within the control of the company and avoidable.
6. The above delayed non-compliance is therefore viewed seriously. You are hereby warned to be careful in future and exercise adequate due care, so that such lapses do



not recur, failing which action may be initiated in accordance with the provisions of SEBI Act, 1992 and Rules and Regulations framed thereunder.

7. You are also advised to place this letter before your Board of Directors in its next meeting and disseminate the same to the stock exchange. The stock exchanges are advised to take note of the contents of the letter.

Yours faithfully,

  
Surabhi Gupta

Copy: BSE (via email)