



J. H. GANDHI & CO.
Chartered Accountants
DECLARATION FOR PAYMENT OF STATUTORY DUES

Jasmit Gandhi
B. Com., F.C.A.,
F.I.I.I.S.L.A.

To,
The Board of Directors
Royal Arc Electrodes Limited
72 B, Bombay Talkies Compound, S.V. Road Malad West,
Mumbai, Maharashtra- 400064.

Dear Sir / Madam,

Subject: Certificate for instances of default or non-payment of statutory dues

Re: Proposed initial public Issue ("IPO") of equity shares of face value Rs. 10 each ("Equity Shares") by Royal Arc Electrodes Limited ("Company") ("Issue") in accordance with the provisions of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 ("SEBI ICDR Regulations"), and other applicable laws, as amended

We, M/s. J. H. Gandhi & Co, Chartered Accountants, Peer review auditors of the Company, have been requested by the Company to provide confirmations on certain matters in relation to the Restated Financial Statements for the half year ended September 30, 2024 for the Financial Year ended March 31, 2024, for the Financial Year ended March 31, 2023 and for the Financial Year ended March 31, 2022, prepared in accordance with the Companies Act, 2013, as amended (the "Companies Act") and Accounting Standards as prescribed by the Institute of Chartered Accountants of India ("ICAI") and restated in accordance with the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("ICDR Regulations"), our report on the Financial Statements proposed to be included in the Red Herring Prospectus ("RHP/Prospectus") and the Prospectus (such RHP/Prospectus being collectively referred to as "Offer Documents") to be filed with the Securities and Exchange Board of India ("SEBI"), any relevant stock exchange(s), and / or other authorities as may be required, pursuant to the SEBI ICDR Regulations and other applicable laws, as amended from time to time.

We hereby declare that there have been no instances of delay or non-payment of Provident Fund and ESIC by the Company, except as disclosed in **Annexure – A**, and brief details are disclosed in **Annexure B**. Further, we declare that there are no delays in the filing of GST Returns by the company, except as disclosed in **Annexure – A**, and brief details are disclosed in **Annexure B**.

We hereby confirm that all the statutory liabilities recorded and outstanding as on September 30, 2024 have been paid as on date and there are no outstanding dues.

This certificate is issued on the basis of copies of challans, returns, and other relevant documents produced by the management of the company before us and verified.

We have conducted our examination in accordance with the "Guidance Note on Reports in Company Prospectuses (Revised 2019)", issued by the Institute of Chartered Accountants of India, in so far it relates to Expert issuing certificates on information included in the prospectus. We hereby confirm that while providing this certificate we have complied with the Code of Ethics and the Standard on Quality Control (SQC) 1, Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements, issued by the Institute of Chartered Accountants of India.

This certificate is for the information of the Book Running Lead Manager to the public issue and may be relied upon by the Company, the Book Running Lead Manager, and the legal advisors appointed by the Company and the Book Running Lead Manager in relation to the Issue. We hereby consent to the submission of this certificate as may be necessary to the Securities and Exchange Board of India (SEBI), the Registrar of Companies, Mumbai ("RoC"), the relevant stock exchanges, any other regulatory authority, and/or for the records to be maintained by the Book Running Lead Manager in accordance with applicable law. We hereby consent to this certificate being disclosed by the Book Running Lead Manager, if required (i) by reason of any law, regulation, or order of a court or by any governmental or competent

regulatory authority, or (ii) in seeking to establish a defence in connection with or to avoid, any actual, potential, or threatened legal, arbitral, or regulatory proceeding or investigation.

We confirm that we will immediately communicate any changes in writing in the above information to the Book Running Lead Manager until the date when the Equity Shares commence trading on the relevant stock exchanges where the Equity Shares are proposed to be listed. In the absence of any such communication from us, the Book Running Lead Manager and the legal advisors, each to the Company and the Book Running Lead Manager, can assume that there is no change to the above information until the Equity Shares commence trading on the relevant stock exchanges pursuant to the Issue.

In no event shall our total liability; to the company or any other person relying on this; for any and all claims, losses, or damages arising out of or in connection with this professional assignment exceed the total amount of fees received by us under this agreement. This limitation of liability applies to all causes of action, including but not limited to breach of contract, negligence, and any other tort or statutory claims.

On the basis of information and explanation provided to us by the company under the assurance, we hereby indemnify the book running lead manager, from losses arising as a result of the aforementioned representations made by me/us in order to disclose details of the same in the issue documents to the extent of fees received by us in agreement with the company.

We confirm that the information in this certificate is true and correct and there is no untrue statement or omission which would render the contents of this certificate misleading in its form or context.

This certificate is issued for the sole purpose of the Offer, and can be used, in full or part, for inclusion in the red herring prospectus, prospectus and any other material used in connection with the Offer, and for the submission of this certificate as may be necessary, to any regulatory/ statutory authority, stock exchanges, any other authority as may be required and/ or for the records to be maintained by the BRLM in connection with the Offer and in accordance with applicable law, and for the purpose of any defense the BRLM may wish to advance in any claim or proceeding in connection with the contents of the offer documents

All capitalized terms used herein and not specifically defined shall have the same meaning as described to them in the Offer Documents.

Yours faithfully,

For and on behalf of

J.H Gandhi & Co

CHARTERED ACCOUNTANTS

Statutory Auditor

FRN: 0116513W



Jasmit Gandhi

(Proprietor)

Membership No.: 044844

UDIN: 25044844BMLMIY5113

Place: Mumbai

Date: 14/01/2025

ENCL: AS ABOVE



Cc: Fedex Securities Private Limited (the "Book Running Lead Manager")

3rd Floor, B Wing, Jay Chambers, Dayaldas Road,

Vile Parle East, Mumbai - 400057

Website: www.fedsec.in

Annexure – A

The Following table depicts the delays in filling of GSTR – 3B Returns by the Company

For the Financial Year/Period	Return Type	Total Number of Return Filled	Delayed Fillings
FY-2021-22	GSTR – 3B	24	6
FY 2022-23	GSTR – 3B	24	1
FY 2023-24	GSTR – 3B	24	-
As on 30 th September,2024	GSTR – 3B	12	-

The Following table depicts the delays in filling of GSTR – 1 Returns by the Company

For the Financial Year/Period	Return Type	Total Number of Return Filled	Delayed Fillings
FY-2021-22	GSTR – 1	24	7
FY 2022-23	GSTR – 1	24	1
FY 2023-24	GSTR – 1	24	-
As on 30 th September,2024	GSTR – 1	12	-

The Following table depicts the delays in filling of GSTR – 6 Returns by the Company

For the Financial Year/Period	Return Type	Total Number of Return Filled	Delayed Fillings
FY-2021-22	GSTR – 6	12	7
FY 2022-23	GSTR – 6	12	8
FY 2023-24	GSTR – 6	12	2
As on 30 th September,2024	GSTR – 6	6	-

Details of Payment of Provident Fund Dues

(Amount in lakhs)

For the Financial Year/Period	Total Amount Paid	Amount Paid within Due Date	Delayed Payment
FY-2021-22	18.62	18.62	1
FY 2022-23	20.68	20.68	3
FY 2023-24	21.41	21.41	-
As on 30 th September,2024	6.80	6.80	-

Details of Payment of ESIC Dues

(Amount in lakhs)

For the Financial Year/Period	Total Amount Paid	Amount Paid within Due Date	Delayed Payment
FY-2021-22	0.17	0.17	-
FY 2022-23	0.15	0.15	-
FY 2023-24	3.99	3.99	2
As on 30 th September,2024	2.37	2.37	-

Annexure – B

Details regarding GST (GSTIN: 24AAACR4146H1ZM)

Month	GSTR 3B filing date	GSTR 3B Due date	GSTR 1 filing date	GSTR 1 Due date
Apr-21	25-05-2021	20-05-2021	13-05-2021	11-05-2021
May-21	28-06-2021	20-06-2021	18-06-2021	11-06-2021
Jun-21	20-07-2021	20-07-2021	10-07-2021	11-07-2021
Jul-21	20-08-2021	20-08-2021	11-08-2021	11-08-2021
Aug-21	20-09-2021	20-09-2021	09-09-2021	11-09-2021
Sep-21	22-10-2021	20-10-2021	11-10-2021	11-10-2021
Oct-21	18-11-2021	20-11-2021	10-11-2021	11-11-2021
Nov-21	18-12-2021	20-12-2021	10-12-2021	11-12-2021
Dec-21	20-01-2022	20-01-2022	10-01-2022	11-01-2022
Jan-22	19-02-2022	20-02-2022	09-02-2022	11-02-2022
Feb-22	19-03-2022	20-03-2022	11-03-2022	11-03-2022
Mar-22	20-04-2022	20-04-2022	11-04-2022	11-04-2022
Apr-22	20-05-2022	20-05-2022	11-05-2022	11-05-2022
May-22	18-06-2022	20-06-2022	10-06-2022	11-06-2022
Jun-22	20-07-2022	20-07-2022	11-07-2022	11-07-2022
Jul-22	19-08-2022	20-08-2022	10-08-2022	11-08-2022
Aug-22	20-09-2022	20-09-2022	10-09-2022	11-09-2022
Sep-22	20-10-2022	20-10-2022	11-10-2022	11-10-2022
Oct-22	20-11-2022	20-11-2022	10-11-2022	11-11-2022
Nov-22	20-12-2022	20-12-2022	11-12-2022	11-12-2022
Dec-22	20-01-2023	20-01-2023	11-01-2023	11-01-2023
Jan-23	20-02-2023	20-02-2023	10-02-2023	11-02-2023
Feb-23	20-03-2023	20-03-2023	10-03-2023	11-03-2023
Mar-23	20-04-2023	20-04-2023	10-04-2023	11-04-2023
Apr-23	20-05-2023	20-05-2023	09-05-2023	11-05-2023
May-23	16-06-2023	20-06-2023	10-06-2023	11-06-2023
Jun-23	19-07-2023	20-07-2023	11-07-2023	11-07-2023
Jul-23	19-08-2023	20-08-2023	10-08-2023	11-08-2023
Aug-23	20-09-2023	20-09-2023	09-09-2023	11-09-2023
Sep-23	19-10-2023	20-10-2023	10-10-2023	11-10-2023
Oct-23	20-11-2023	20-11-2023	11-11-2023	11-11-2023
Nov-23	20-12-2023	20-12-2023	08-12-2023	11-12-2023
Dec-23	17-01-2024	20-01-2024	09-01-2024	11-01-2024
Jan-24	20-02-2024	20-02-2024	07-02-2024	11-02-2024
Feb-24	19-03-2024	20-03-2024	11-03-2024	11-03-2024
Mar-24	20-04-2024	20-04-2024	10-04-2024	11-04-2024
Apr-24	18-05-2024	20-05-2024	09-05-2024	11-05-2024
May-24	20-06-2024	20-06-2024	11-06-2024	11-06-2024
Jun-24	20-07-2024	20-07-2024	10-07-2027	11-07-2024
Jul-24	20-08-2024	20-08-2024	09-08-2024	11-08-2024
Aug-24	20-09-2024	20-09-2024	10-09-2024	11-09-2024
Sep-24	18-10-2024	20-10-2024	11-10-2024	11-10-2024

Details regarding GST (GSTIN: 27AAACR4146H2ZF)

Month	GSTR 6 filing date	GSTR 6 Due date
Apr-21	16-06-2021	13-05-2021
May-21	22-07-2021	13-06-2021
Jun-21	23-09-2021	13-07-2021
Jul-21	23-09-2021	13-08-2021
Aug-21	23-09-2021	13-09-2021
Sep-21	21-10-2021	13-10-2021
Oct-21	13-11-2021	13-11-2021
Nov-21	11-12-2021	13-12-2021
Dec-21	19-01-2022	13-01-2022
Jan-22	11-02-2022	13-02-2022
Feb-22	13-03-2022	13-03-2022
Mar-22	13-04-2022	13-04-2022
Apr-22	16-05-2022	13-05-2022
May-22	13-06-2022	13-06-2022
Jun-22	13-07-2022	13-07-2022
Jul-22	13-08-2022	13-08-2022
Aug-22	14-09-2022	13-09-2022
Sep-22	17-10-2022	13-10-2022
Oct-22	18-11-2022	13-11-2022
Nov-22	16-12-2022	13-12-2022
Dec-22	16-01-2023	13-01-2023
Jan-23	13-02-2023	13-02-2023
Feb-23	20-03-2023	13-03-2023
Mar-23	17-04-2023	13-04-2023
Apr-23	22-05-2023	13-05-2023
May-23	06-06-2023	13-06-2023
Jun-23	07-07-2023	13-07-2023
Jul-23	16-08-2023	13-08-2023
Aug-23	11-09-2023	13-09-2023
Sep-23	12-10-2023	13-10-2023
Oct-23	11-11-2023	13-11-2023
Nov-23	05-12-2023	13-12-2023
Dec-23	11-01-2024	13-01-2024
Jan-24	07-02-2024	13-02-2024
Feb-24	11-03-2024	13-03-2024
Mar-24	10-04-2024	13-04-2024
Apr-24	09-05-2024	13-05-2024
May-24	10-06-2024	13-06-2024
Jun-24	12-07-2024	13-07-2024
Jul-24	10-08-2024	13-08-2024
Aug-24	11-09-2024	13-09-2024
Sep-24	10-10-2024	13-10-2024

Details regarding GST (GSTIN: 27AAACR4146H1ZG)

Month	GSTR 3B filing date	GSTR 3B Due date	GSTR 1 filing date	GSTR 1 Due date
Apr-21	26-05-2021	20-05-2021	13-05-2021	11-05-2021
May-21	26-06-2021	20-06-2021	18-06-2021	11-06-2021
Jun-21	20-07-2021	20-07-2021	19-07-2021	11-07-2021
Jul-21	19-08-2021	20-08-2021	11-08-2021	11-08-2021
Aug-21	20-09-2021	20-09-2021	08-09-2021	11-09-2021
Sep-21	21-10-2021	20-10-2021	20-10-2021	11-10-2021
Oct-21	18-11-2021	20-11-2021	11-11-2021	11-11-2021
Nov-21	18-12-2021	20-12-2021	10-12-2021	11-12-2021
Dec-21	20-01-2022	20-01-2022	10-01-2022	11-01-2022
Jan-22	20-02-2022	20-02-2022	09-02-2022	11-02-2022
Feb-22	19-03-2022	20-03-2022	11-03-2022	11-03-2022
Mar-22	20-04-2022	20-04-2022	13-04-2022	11-04-2022
Apr-22	24-05-2022	20-05-2022	10-05-2022	11-05-2022
May-22	18-06-2022	20-06-2022	10-06-2022	11-06-2022
Jun-22	20-07-2022	20-07-2022	10-07-2022	11-07-2022
Jul-22	19-08-2022	20-08-2022	10-08-2022	11-08-2022
Aug-22	20-09-2022	20-09-2022	10-09-2022	11-09-2022
Sep-22	20-10-2022	20-10-2022	11-10-2022	11-10-2022
Oct-22	20-11-2022	20-11-2022	20-11-2022	11-11-2022
Nov-22	20-12-2022	20-12-2022	11-12-2022	11-12-2022
Dec-22	20-01-2023	20-01-2023	10-01-2023	11-01-2023
Jan-23	18-02-2023	20-02-2023	10-02-2023	11-02-2023
Feb-23	18-03-2023	20-03-2023	09-03-2023	11-03-2023
Mar-23	20-04-2023	20-04-2023	10-04-2023	11-04-2023
Apr-23	20-05-2023	20-05-2023	09-05-2023	11-05-2023
May-23	16-06-2023	20-06-2023	10-06-2023	11-06-2023
Jun-23	19-07-2023	20-07-2023	11-07-2023	11-07-2023
Jul-23	19-08-2023	20-08-2023	10-08-2023	11-08-2023
Aug-23	20-09-2023	20-09-2023	09-09-2023	11-09-2023
Sep-23	19-10-2023	20-10-2023	10-10-2023	11-10-2023
Oct-23	20-11-2023	20-11-2023	10-11-2023	11-11-2023
Nov-23	20-12-2023	20-12-2023	08-12-2023	11-12-2023
Dec-23	17-01-2024	20-01-2024	09-01-2024	11-01-2024
Jan-24	20-02-2024	20-02-2024	07-02-2024	11-02-2024
Feb-24	19-03-2024	20-03-2024	11-03-2024	11-03-2024
Mar-24	20-04-2024	20-04-2024	10-04-2024	11-04-2024
Apr-24	18-05-2024	20-05-2024	09-05-2024	11-05-2024
May-24	20-06-2024	20-06-2024	11-06-2024	11-06-2024
Jun-24	20-07-2024	20-07-2024	11-07-2024	11-07-2024
Jul-24	20-08-2024	20-08-2024	09-08-2024	11-08-2024
Aug-24	20-09-2024	20-09-2024	10-09-2024	11-09-2024
Sep-24	18-10-2024	20-10-2024	11-10-2024	11-10-2024

Details regarding Provident Fund

Month	Due Date of Payment	Actual date of Payment	Amount of Due for Payment	Amount Paid
Apr-21	15-05-2021	13-05-2021	1.43	1.43
May-21	15-06-2021	18-06-2021	0.12	0.12
May-21	15-06-2021	14-06-2021	1.31	1.31
Jun-21	15-07-2021	15-07-2021	1.53	1.53
Jul-21	15-08-2021	13-08-2021	1.54	1.54
Aug-21	15-09-2021	14-09-2021	1.58	1.58
Sep-21	15-10-2021	14-10-2021	1.50	1.50
Oct-21	15-11-2021	13-11-2021	1.62	1.62
Nov-21	15-12-2021	13-12-2021	1.62	1.62
Dec-21	15-01-2022	14-01-2022	1.62	1.62
Jan-22	15-02-2022	12-02-2022	1.61	1.61
Feb-22	15-03-2022	12-03-2022	1.54	1.54
Mar-22	15-04-2022	13-04-2022	1.61	1.61
Apr-22	15-05-2022	13-05-2022	1.67	1.67
Apr-22	15-05-2022	09-08-2022	0.02	0.02
May-22	15-06-2022	14-06-2022	1.64	1.64
May-22	15-06-2022	09-08-2022	0.01	0.01
Jun-22	15-07-2022	14-07-2022	1.68	1.68
Jun-22	15-07-2022	09-08-2022	0.02	0.02
Jul-22	15-08-2022	10-08-2022	1.77	1.77
Aug-22	15-09-2022	14-09-2022	1.70	1.70
Sep-22	15-10-2022	15-10-2022	1.63	1.63
Oct-22	15-11-2022	12-11-2022	1.73	1.73
Oct-22	15-11-2022	15-11-2022	0.01	0.01
Nov-22	15-12-2022	12-12-2022	1.72	1.72
Dec-22	15-01-2023	12-01-2023	1.83	1.83
Jan-23	15-02-2023	14-02-2023	1.79	1.79
Feb-23	15-03-2023	14-03-2023	1.69	1.69
Mar-23	15-04-2023	14-04-2023	1.78	1.78
Apr-23	15-05-2023	13-05-2023	1.74	1.74
May-23	15-06-2023	14-06-2023	1.73	1.73
Jun-23	15-07-2023	13-07-2023	1.75	1.75
Jul-23	15-08-2023	09-08-2023	1.77	1.77
Aug-23	15-09-2023	12-09-2023	1.79	1.79
Sep-23	15-10-2023	14-10-2023	1.85	1.85
Oct-23	15-11-2023	10-11-2023	1.88	1.88
Nov-23	15-12-2023	13-12-2023	1.82	1.82
Dec-23	15-01-2024	11-01-2024	1.79	1.79
Jan-24	15-02-2024	12-02-2024	1.78	1.78
Feb-24	15-03-2024	14-03-2024	1.75	1.75

Mar-24	15-04-2024	15-04-2024	1.78	1.78
Apr-24	15-05-2024	13-05-2024	0.98	0.98
May-24	15-06-2024	13-06-2024	1.01	1.01
Jun-24	15-07-2024	09-07-2024	1.07	1.07
Jul-24	15-08-2024	13-08-2024	1.20	1.20
Aug-24	15-09-2024	14-09-2024	1.22	1.22
Sep-24	15-10-2024	15-10-2024	1.31	1.31

Details regarding ESIC

Month	Due Date of Payment	Actual date of Payment	Amount of Due for Payment	Amount Paid
Apr-21	15-05-2021	13-05-2021	0.01	0.01
May-21	15-06-2021	14-06-2021	0.01	0.01
Jun-21	15-07-2021	14-07-2021	0.01	0.01
Jul-21	15-08-2021	13-08-2021	0.01	0.01
Aug-21	15-09-2021	14-09-2021	0.01	0.01
Sep-21	15-10-2021	14-10-2021	0.01	0.01
Oct-21	15-11-2021	13-11-2021	0.02	0.02
Nov-21	15-12-2021	13-12-2021	0.02	0.02
Dec-21	15-01-2022	14-01-2022	0.02	0.02
Jan-22	15-02-2022	12-02-2022	0.02	0.02
Feb-22	15-03-2022	12-03-2022	0.02	0.02
Mar-22	15-04-2022	13-04-2022	0.02	0.02
Apr-22	15-05-2022	13-05-2022	0.01	0.01
May-22	15-06-2022	14-06-2022	0.01	0.01
Jun-22	15-07-2022	14-07-2022	0.01	0.01
Jul-22	15-08-2022	10-08-2022	0.01	0.01
Aug-22	15-09-2022	14-09-2022	0.01	0.01
Sep-22	15-10-2022	15-10-2022	0.01	0.01
Oct-22	15-11-2022	12-11-2022	0.01	0.01
Nov-22	15-12-2022	15-12-2022	0.02	0.02
Dec-22	15-01-2023	12-01-2023	0.02	0.02
Jan-23	15-02-2023	14-02-2023	0.02	0.02
Feb-23	15-03-2023	13-03-2023	0.01	0.01
Mar-23	15-04-2023	14-04-2023	0.02	0.02
Apr-23	15-05-2023	13-05-2023	0.32	0.32
May-23	15-06-2023	14-06-2023	0.30	0.30
Jun-23	15-07-2023	14-07-2023	0.35	0.35
Jul-23	15-08-2023	09-08-2023	0.33	0.33
Aug-23	15-09-2023	12-09-2023	0.34	0.34
Sep-23	15-10-2023	19-10-2023	0.37	0.37
Sep-23	15-10-2023	19-10-2023	0.00	0.00

Oct-23	15-11-2023	10-11-2023	0.38	0.38
Oct-23	15-11-2023	10-11-2023	0.01	0.01
Nov-23	15-12-2023	13-12-2023	0.32	0.32
Nov-23	15-12-2023	13-12-2023	0.01	0.01
Dec-23	15-01-2024	12-01-2024	0.33	0.33
Dec-23	15-01-2024	11-01-2024	0.01	0.01
Jan-24	15-02-2024	13-02-2024	0.30	0.30
Jan-24	15-02-2024	13-02-2024	0.00	0.00
Feb-24	15-03-2024	14-03-2024	0.30	0.30
Mar-24	15-04-2024	13-04-2024	0.31	0.31
Apr-24	15-05-2024	13-05-2024	0.31	0.31
May-24	15-06-2024	15-06-2024	0.38	0.38
Jun-24	15-07-2024	09-07-2024	0.39	0.39
Jul-24	15-08-2024	14-08-2024	0.41	0.41
Aug-24	15-09-2024	11-09-2024	0.42	0.42
Sept-24	15-10-2024	11-10-2024	0.46	0.46