

CERTIFICATE ON OUTSTANDING LITIGATION

March 24, 2025

To,

**The Board of Directors
Swastika Infra Limited
(Formerly known as Swastika Infra Private Limited)**
Plot no.14&15, Gajraj Apartment,
Motilal Atal Road, Opposite Hotel Neelam,
Jaipur – 302001,
Rajasthan, India.

and

Srujan Alpha Capital Advisors LLP
824 & 825, Corporate Avenue,
Sonawala Rd, Goregaon, Mumbai,
Maharashtra 400064

and

PhillipCapital (India) Private Limited
1,18th Floor Urmi Estate
95 Ganpatrao Kadam Marg, Lower Parel (W),
Mumbai 400013

**(Srujan Alpha Capital Advisors LLP and PhillipCapital (India) Private Limited
referred to as the “BRLM’S”)**

Dear Sir(s),

Re.: Certificate on Outstanding Litigations

**Sub: Proposed initial public offering of equity shares of ₹ 10/- each (the “Equity Shares”) of
Swastika Infra Limited (the “Company” and such offering, the “Issue”)**

1. We, A. Bafna & Co., Chartered Accountants, Firm Registration Number: 003660C (hereinafter referred as “Statutory Auditor”) of the company, have issued this certificate in terms of our Engagement letter dated November 29, 2024.
2. The accompanying **Annexure – A** “Statement of Non-Payment of Outstanding Litigation” containing the details of non-payment of statutory dues as at February 28, 2025 (hereinafter referred to as the ‘Statement’) has been prepared by the management of the company, which has been initialed by us for identification purposes only.

**Certificate on Non-Payment of Statutory Dues
For Swastika Infra Limited-IPO**



Management's Responsibility for the Statement

3. The Management of the Company is responsible for the preparation of the accompanying Statement as per the requirements of the SEBI ICDR Regulations, based on books of account. The Management of the Company is also responsible for the preparation and maintenance of all the records supporting its contents. The responsibility includes collecting, collating and validating data and designing, implementing and monitoring of internal controls relevant to the preparation of the Statement that is free from material misstatement, whether due to fraud or error and establishing the procedures to be performed. The Statement has been prepared by the Management of the Company and stamped and initialed by us for identification purpose only.

Auditors' Responsibility

4. Pursuant to the Engagement Letter dated November 29, 2024, it is our responsibility to provide reasonable assurance and conclude whether on our examination of books and records maintained by the Company and produced for our examination whether the Statement containing details of the Non-payment of statutory dues as at February 28, 2025 has been accurately extracted from the unaudited financial information of the Company for the six months period ended September 30, 2024 & from the unaudited financial information provided by management of the company for the period ended February 28, 2025 /other records of the company / data on Govt portal and is arithmetically correct.
5. The audited financial statement referred in paragraph 4 above for the six-month period ended September 30, 2024 were audited by us on which we have issued an unmodified audit opinion vide our report dated March 24, 2025 & unaudited financial information referred in paragraph 4 above as on February 28, 2025 have been prepared by the management and we have neither conducted audit nor review of the same.
6. Our engagement was undertaken in accordance with the Guidance note on Reports or Certificates for Special Purposes (Revised 2016) ("The Guidance Note") issued by the ICAI. The Guidance Note requires that we comply with the independence and ethical requirements of the Code of Ethics issued by the ICAI.
7. We have complied with the relevant applicable requirements of 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 ICAI.
8. Our scope of work did not include verification of compliance with other requirements of the SEBI ICDR Regulations, other circulars, notifications, etc. as issued by relevant regulatory authorities in India from time to time and any other laws and regulations applicable to the company. Further, our scope of work did not involve performing audit tests for the purpose of expressing an opinion on the fairness or accuracy of any of the financial information or the financial statements of the Company, taken as a whole nor a review made in accordance with the generally accepted auditing standards in India and consequently, no assurance is expressed.
9. A reasonable assurance engagement includes performing procedures to obtain sufficient appropriate evidence on the matters specified in paragraph 4 above, the procedures selected depend upon the auditor's judgement including the risks associated with the matters mentioned in Para 4 above, we

have performed the following procedures with respect to the Statement:

- a) We have traced the outstanding litigation included in statement from the audited financial statement of the Company for the period ended September 30, 2024.
- b) We have Traced the outstanding litigation as on February 28, 2025 included in statement from the unaudited financial data of the Company for the period ended February 28, 2025.
- c) We have checked the outstanding actions by statutory or regulatory authorities.
- d) We have checked the outstanding claims relating to direct and indirect taxes.
- e) We have checked other pending litigation as determined to be material by the Board of the Company pursuant to the Materiality Policy provided by the management to us.
- f) We have reviewed the information and explanation, books of accounts, agreements, terms of engagement, statutory records maintained by the Company, minutes of the meetings of the Board of Directors of the Company, minutes of annual general meeting and extra-ordinary general meetings of the Company, relevant statutory registers and other relevant documents which are presented to us.

Opinion

10. Based on the procedures performed as specified in Paragraph 9 above, evidence obtained and the information and explanations provided to us, along with representations provided by the management of the Company, in our opinion:

- a) there are no outstanding notices, litigation or default relating to matters likely to affect the operations and finances of the Company including disputed direct or indirect tax liabilities and prosecution under any enactment in respect of Schedule V to the Companies Act, 2013, as amended as on February 28, 2025, except as disclosed in Annexure A.
- b) There have been no instances of rescheduling or defaults or acceleration of payment in payment of loan from any bank or interest thereon by the Company except as disclosed in Annexure A.
- c) there have been no instances of overdue to companies or financial institutions by the Company except as disclosed in Annexure A.
- d) there have been no instances of defaults against companies or financial institutions by the relevant parties, except as disclosed in Annexure A.
- e) there have been no instances of criminal proceedings or actions of statutory or regulatory authorities or outstanding claims relating to direct and indirect taxes involving relevant parties, except as disclosed in Annexure A.
- f) there have been no instances of contingent liabilities not provided for, except as disclosed in Annexure A.
- g) no outstanding litigation or default relating to matters likely to affect the operations and finances of the Company including disputed tax liabilities and prosecution under any enactment in respect of Schedule V to the Companies Act, 2013, as amended, except as disclosed in Annexure A.
- h) The company has not issued any debentures and it has not accepted any deposit hence the information is Nil.

11. Capitalized terms used herein, unless otherwise specifically defined, shall have the same meaning as ascribed to them in the Offer Document for the Issue.

Restriction on use

12. This certificate has been issued at the request of the Company solely for use in connection with the Issue and the contents of this certificate, whether in full or in part or extracts hereof, can be disclosed in the Draft Red Herring Prospectus ("DRHP")/ Red herring Prospectus ("RHP")/ Prospectus (Collectively Known as Offer documents) and other documents or materials in relation to the Issue.
13. The information contained herein can be relied upon by the Company and BRLM'S, and such information or the certificate can be submitted to the Stock Exchanges, the Securities and Exchange Board of India, and any other regulatory or statutory authority in India in respect of the Issue, as may be required and for the records to be maintained by the BRLM'S in connection with the Issue.
14. We do not accept or assume any liability or any duty of care to any person, other than to whom this certificate is addressed, to whom this certificate is shown or into whose hands it may come without our prior consent in writing.
15. Our obligations in respect of this report are entirely separate from, and our responsibility and liability are in no way changed by, any other role we may have (or may have had) as auditors of the Company or otherwise. Nothing said in this report, nor anything said or done in the course of or in connection with the services that are the subject of this report, will extend any duty of care we may have in our capacity as statutory auditor of the Company.

For A Bafna & Co
Chartered Accountants
FRN – 003660C



Rajat Sharma
(Partner)

M. No. – 428792

UDIN 25428792 BM HD HT 5457



Date – March 24, 2025

Place – Jaipur

SWASTIKA INFRA LIMITED

(Formerly Known as Swastika Infra Private Limited)

REGD. OFFICE: PLOT NO.14 & 15, FIRST FLOOR, "GAJRAJ APARTMENT MOTILAL ATAL ROAD,
OPPOSITE HOTEL NEELAM JAIPUR RAJASTHAN 302001 INDIA

CIN: U51909RJ2019PLC065892 E MAIL -ID: info@swastikainfra.com

Contact No.:+91-9116135709

Annexure A

Statement for Outstanding Litigation

We confirm that: -

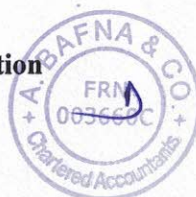
- (1) There are no pending litigation or default relating to matters involving our Company likely to affect the operations and finances of the Company including disputed direct or indirect tax liabilities and prosecution under any act or law or under any law or tribunal, as amended as at February 28, 2025, except as disclosed in below table / details of outstanding litigations as on February 28, 2025.

S.No	Statute and nature of litigations	Financial year to which the matter pertains	Forum where dispute is pending	Amount in lakhs
Litigation Against Our Company				
1.	Outstanding criminal proceedings	Nil	Nil	Nil
2.	Actions initiated by regulatory or statutory authorities	Nil	Nil	Nil
3.	Outstanding material civil litigation	Nil	Nil	Nil

Tax Proceedings

S. No.	Type of Proceedings	Number of cases	Amount in lakhs
Tax Proceeding Against our Company			
1.	Direct Tax	1	0.59
2.	Indirect Tax	3	56.86
	Total	4	57.45

- (2) Ajmer Vidyut Vitran Nigam Limited (AVVNL) has issued Show Cause Notice against the Company. Company has filed Civil writ Petition before the Hon'ble High Court of Rajasthan, Jaipur Bench. Company was regularly paid for price variation of copper transformers against invoices raised. however, due to an audit objection raised by the CAG



SWASTIKA INFRA LIMITED

(Formerly Known as Swastika Infra Private Limited)

REGD. OFFICE: PLOT NO.14 & 15, FIRST FLOOR, "GAJRAJ APARTMENT MOTILAL ATAL ROAD,

OPPOSITE HOTEL NEELAM JAIPUR RAJASTHAN 302001 INDIA

CIN: U51909RJ2019PLC065892 E MAIL -ID: info@swastikainfra.com

Contact No.:+91-9116135709

Audit, observing that the price variation for copper transformers was not payable in the scheme. Thereafter, the Company received a letter dated July 7,2021 wherein it was stated that the CAG Audit had raised objection with regard to price variation on copper wound transfer and directed AVVNL to recover the sanctioned price variations amounts from the respective firms which included the company, the company has contingent liability estimated approximately around Rs. 188.15 lacs. This case is presently pending and next hearing date yet to be notified

- (3) There have been no instances of rescheduling or defaults or acceleration of payment in payment of loan from any bank or interest thereon by the Company.
- (4) There have been no instances of criminal proceedings involving our Company.
- (5) There have been no instances of overdue to companies or financial institutions by the Company.
- (6) There have been no instances of defaults against companies or financial institutions by the Company.
- (7) There have been no instances of contingent liabilities not provided for / disclosed in accordance with the relevant accounting standards.
- (8) No outstanding litigation or default relating to matters likely to affect the operations and finances of the Company including disputed tax liabilities and prosecution under any enactment as amended.
- (9) The company has not issued any debentures and it has not accepted any deposit.

**Initialled for Identification Purposes
For A Bafna & Co,
Chartered Accountants
FRN.:003660C**



**Rajat Sharma
Partner**

Membership No. 428792


Place: Jaipur


Date: March 24, 2025





Certified to be True & Correct

**For and on behalf of the Board of Directors of
Swastika Infra Limited**


**Vinay Gupta
Managing Director
(DIN No: 00172263)**


**Biren Parnami
Chief Financial Officer**


**Ruchira Gupta
Whole Time Director
(DIN No: 08455842)**


**CS Arti Bansal
Company Secretary
(MembershipNo: 43282)**