Satyajit Mishra & Co.
Company Secretaries

Annexure III

To, The Manager – Listing Operations, BSE Limited, Dalal Street, Mumbai – 400 001	To, The Manager – Listing Compliance National Stock Exchange of India Limited 'Exchange Plaza', C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051	To, The Manager – Listing Department 205(A), 2nd floor, Piramal Corporate Park, Kamani Junction, L.B.S Road, Kurla (West), Mumbai - 400070.

Dear Sir/Madam

Sub: Application for "In-principle approval" prior to issue and allotment of up to 2,25,000 equity shares on a preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

I, Satyajit Mishra, Proprietor of M/s. Satyajit Mishra & Co. Practicing Company Secretary and Secretarial Auditor, have verified the relevant records and documents of Creative Newtech Limited with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

i. The proposed issue is being made in accordance with the requirements of Chapter V of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, the Companies Act, 2013 and Rules made thereunder, ~~sectoral regulators (if any)~~ and the amendments thereof, pertaining to conditions for preferential issue.

   Further, the company shall comply with all legal and statutory formalities, and no statutory authority has restrained the company from issuing these proposed securities.

ii. The proposed preferential issue is being made in compliance with the provisions of the Memorandum of Association (MoA) and Articles of Association (AoA) of the company.

iii. The AOA of the issuer ~~provides/~~ does not provide for an alternate method of determination of price in case of further issue of capital, which would be higher than the floor price derived through SEBI regulations.

iv. Certified copy of the compliance certificate from the Practicing Company Secretary is placed on the website of the Company and shall also be placed before the General Meeting as per Regulation 163 (2) of the SEBI (ICDR) Regulations, 2018.

v. The entire pre-preferential holding of the allottee (name of proposed allottees along with number of securities held by them) and that the same is in dematerialized form. ***Not Applicable, since pre-preferential shareholding of the proposed allottee is NIL.***

SATYAJIT MISHRA & CO. FCS 5759 CP-4997 Mumbai. Company Secretaries

Unit 404, Kamlacharan Commercial Premises Co-op Soc. Ltd., Jawahar Nagar Phatak,
Above SRV Hospital, Goregaon (West), Mumbai 400 104
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vi. Pricing Methodology adopted for the proposed Preferential issue- ***Please refer the valuation report from independent registered valuer.***

vii. Shares of the Company are highest traded on National Stock Exchange of India Limited ("NSE Limited") having the highest trading volume in respect of the equity shares of the issuer, as recorded during the preceding 90 trading days prior to the relevant date.

viii. None of the proposed allottees belonging to promoter(s) or the promoter group is ineligible for allotment in terms of Regulation 159 of SEBI (ICDR) Regulations, 2018. ***Not Applicable.***

ix. The proposed allottee (Onyx Saas Private Limited) has not sold any equity shares of the company during the 90 trading days preceding the relevant date.

Further, where the proposed allottee(s) is/ are promoter/ promoter group entity, then none of the entities in the promoter and promoter group entities has/ have sold any equity share of the company during the 90 trading days preceding the relevant date. ***Not Applicable.***

x. Onyx Saas Private Limited does not hold any equity shares of the issuer for a period starting from the relevant date till date.

xi. The pre-preferential shareholding of each of the proposed allottee(s) has been locked in accordance with Regulation 167 (6) of the SEBI (ICDR) Regulations, 2018. Further, there is no sale/ pledge of pre-preferential holding from (Relevant Date) till (date of lock-in). The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder: ***Not Applicable.***

Name of Proposed Allottee	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
NA	NA	NA	NA	NA	NA	NA

(*) client id/ folio no in case the allottee holds the securities in physical form.

xii. The total allotment to the allottee acting in concert in the present preferential issue or in the same financial year, i.e., 2026-2027 is less than 5% of the post-issue fully diluted share capital of the issuer.

For Satyajit Mishra & Co.
Company Secretaries



Satyajit Mishra
Proprietor
Membership No. F5759
C.P. No. 4997
P R No. 1769/2022
UDIN: F005759H002155907

Satyajit Mishra & Co.
Company Secretaries

Dated this November 05, 2026 at Mumbai.

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