

Date: - 06/06/2025

To,

**National Stock Exchange of India Limited** 

Exchange Plaza Plot no. C/1, G Block Bandra-Kurla Complex, Bandra (East) Mumbai 400051

Dear Sir,

**NSE Symbol: POSITRON** 

Subject: Statement of Deviation or Variation in the use of proceeds raised through IPO for the year ended 31st March, 2025 as per Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Pursuant to Regulation 32 of the SEBI Listing Regulations and SEBI Circular No. CIR/CFD/CMD1/162/2019 dated December 24, 2019, we hereby confirm that there is no deviation or variation in the use of proceeds, proceeds from the objects stated in the prospectus dated August 14, 2024 issued by Positron Energy Limited.

Please find attached herewith following documents for your record:

- 1. A Statement of utilization of IPO proceeds.
- 2. CA certificate as per Regulation 262 (5) of SEBI (ICDR), 2018 regarding utilization of money raised through the public issue (IPO Proceeds)
- 3. CA certificate as per Regulation 262 (6) of SEBI (ICDR), 2018 regarding utilization of working capital raised through the public issue (IPO Proceeds)

Please take the same on your record.

Thanking you, Yours faithfully

For, Positron Energy Limited

Name of Signatory: - Rajiv Menon Designation: Managing Director

DIN: 01958636

Home validate

Amount in (Lakhs)

Statement on Deviation or Variation for proceeds of Public Issue, Rights Issue, Preferential Issue  Qualified Institutions Placement Etc. (1)						
Mode of Fund Raising Public Issues						
Description of mode of fund raising (Applicable in case of others is selected)						
Date of Raising Funds	20-08-2024					
Amount Raised	51.21					
Report filed for Quarter ended	31-03-2025					
Monitoring Agency	Not applicable					
Monitoring Agency Name, if applicable						
Is there a Deviation / Variation in use of funds raised	No					
If yes, whether the same is pursuant to change in terms						
of a contract or objects, which was approved by the shareholders						
If Yes, Date of shareholder Approval						
Explanation for the Deviation / Variation	NA					
Comments of the Audit Committee after review	NA					
Comments of the auditors, if any	NO					

#### Objects for which funds have been raised and where there has been a deviation, in the following table:

Sr.	Original Object	Modified Object, if any	Original Allocation	Modified allocation, if any	Funds Utilised	Amount of Deviation/Variation for the quarter according to applicable object	Remarks if any	
Add Delete								
1	Working Capital Requirement	NA	38.20	0.00	38.20	0.00		
2	General Corporate Purpose	NA	8.62	0.00	8.62	0.00		
3	Issue Expense	NA	4.39	0.00	4.39	0.00		



## ABHISHEK KUMAR & ASSOCIATES

### CHARTERED ACCOUNTANT

To,
The Board of Directors,
Positron Energy limited
Office No. 3, It Tower-2, Ground Floor, Infocity,
Gandhinagar, Sector 7, Gujarat, India, 382007.

# Independent Practitioners Certificate for Utilization of the Issue Proceeds as at the year ended 31st March, 2025.

- 1. This Certificate is issued in accordance with the terms of our engagement letter Dated 20 July 2024.
- 2. The accompanying statement (Annexure A) contains details of manner of the Utilization of funds as stated in the final "Prospectus" dated 14th August, 2024, a document issued by Positron Energy Limited as at year ended 31st March, 2025. The Funds were raised by the company pursuant to the Fresh public Issue of up to 20,48,400 units aggregating up to Rs. 5121.00 lakhs.

### Managements Responsibility

- 3. The accompanying Statement, including the creation and maintenance of all accounting and other records supporting its contents, is solely the responsibility of the Management of the Company. The Management is responsible for the designing, implementing and maintaining internal control relevant to the preparation and presentation of the Statement, and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.
- 4. The Management is also responsible for ensuring that the Company complies with the requirements of the SEBI and for providing all relevant information to the Securities Exchange Board of India. The Company is also responsible to comply with the requirements of the various Lenders, Banks & Financial institutions.

#### Practitioner's Responsibility

- 5. It is our responsibility to obtain reasonable assurance and form an opinion as to whether the Statement is in agreement with the manner of utilization of funds as stated in the final "Prospectus" document as at year ended 31st March, 2025.
- 6. We have verified and relied on the following documents/details:
  - 1. The proposed proceeds from Public Issue and proposed utilization of proceeds as per the final "Prospectus" document;
  - 2. The bank statements with regards to the receipt of the total proceeds from the Public Issue.
  - The bank statements with regards to the utilization of the proceeds as per the final "Prospectus" document.
  - 4. Below are abbreviations used in the Annexure A:
  - 5. Such other documents/ details and MRL received from the Company.
- 7. We conducted our examination of the Statement in accordance with the Guidance Note on Reports or Certificates for Special Purposes issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.
- 8. 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.

### Opinion

9. Based on the information and explanation provided to us, in our opinion, a) the accompanying statement (Annexure A) is in agreement with the manner of utilization of funds as stated in the "Prospectus" issued by the Company and b) there are no deviations in the use of proceeds from the objects stated in the Prospectus.

We further certify that as on 31st March, 2025, the Company has utilized Rs. 5121.00 Lakh as stated in the "Prospectus" and there is balance of Rs. Nil pending for utilization.

### Restriction on Use

10. This certificate is addressed to and provided to the management of the company solely for the purpose of submitting it to SEBI/Exchange and should not be used for any other purpose. Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this certificate is shown or into whose hands it may come without our prior consent in writing.

For ABHISHEK KUMAR & ASSOCIATES

Chartered Accountants Firm Reg. No.: 130052W

CA. Abhishek Agrawal

Proprietor

Membership No.: 132305 UDIN: 25132305BMHVVP9703

Date: 03rd May, 2025 Place: Ahmedabad

### Annexure 1

S.N.	Original Object of issue	Modified Object	Original Allocation (Rs. In Lakhs)	Modified allocation, if any	Funds utilized (Rs. In Lakhs)	Funds Unutilized (Rs. In Lakhs)	Remarks
1	To Meet Working Capital Requirements		3820.00		3820.00	Nil	Remaining Amount utilized In Next Year.
2	General Corporate Purpose		862.33		862.33	Nil	Remaining Amount utilized In Next Year.
3.	Issue related expenses	= 5	438.67	KUMA	438.67	Nil	Remaining Amount utilized In Next Year.



## **ABHISHEK KUMAR & ASSOCIATES**

## CHARTERED ACCOUNTANT

## CERTIFICATE FOR UTILIZATION OF FUNDS FOR WORKING CAPITAL

To
The Board of Directors.
Positron Energy limited
(Formerly Known as Positron Energy Private Limited)
Office No. 3, IT Tower-2, Ground Floor, Infocity,
Gandhinagar, Sector 7, Gujarat, India, 382007.

- 1. This certificate is issued in accordance with the terms of our engagement letter.
- 2. The accompanying Statement contains details of manner of the utilization of funds for working capital as stated in the offer document for the Initial Public offer (the "Statement") by Positron Energy Limited (Formerly Known as "Positron Energy Private Limited") (the "Company"). The Funds were raised by the company pursuant to the Fresh public Issue of up to 20,48,400 units aggregating up to Rs. 5121.00 lakhs from which 3820.00 lakhs being used for funding the working capital requirements of the company.

### Managements' Responsibility for the Statement

- 3. The preparation of the accompanying Statement is the responsibility of the Management of the Company. This responsibility includes designing, implementing and maintaining internal control relevant to the preparation and presentation of the Statement, and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.
- 4. The Management is also responsible for ensuring that the Company complies with the requirements of the Equity Listing Agreement, Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 ("ICDR"), Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR") and for providing all relevant information to the Securities and Exchange Board of India ("SEBI").

### Auditor's Responsibility

- 5. Pursuant to the requirements of the ICDR, it is our responsibility to obtain reasonable assurance and form an opinion as to whether the Statement is in agreement with the audited financial statements for the year ended March 31, 2025 and books and records of the Company.
- 6. The financial statements referred to in paragraph 5 above, have been audited by us on which we issued an unmodified audit opinion vide our reports dated May 03, 2025. Our audits of these financial statements were conducted in accordance with the Standards on Auditing and other applicable authoritative pronouncements issued by the Institute of Chartered Accountants of India. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. Our audits were not planned and performed in connection withany transactions to identify matters that may be of potential interest to third parties.

- 7. We conducted our examination of the Statement in accordance with the Guidance Note on Reports or Certificates for Special Purposes (Revised 2016) issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.
- 8. 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.

### **Opinion**

9. Based on our examination as above, and the information and explanations given to us, in our opinion, the Statement is in agreement with the audited financial statements and books of account for the year ended March 31, 2025 of the Company and fairly presents, in all material respects, the manner of the utilization of funds and purpose for which the funds were raised i.e. working capital.

### Restriction on Use

10. This certificate is addressed to and provided to the Board of Directors of the Company solely for the purpose of submission to the stock exchange as per the requirements of ICDR and should not be used by any other person or for any other purpose. Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this certificate is shown or into whose hands it may come without our prior consent in writing.

For ABHISHEK KUMAR & ASSOCIATES

Chartered Accountants Firm Reg. No. – 130052W

CA. Abhishek Agrawal

Proprietor

Membership No. - 132305

UDIN: 25132305BMHVYS7592

Date: 03, May , 2025 Place: Ahmedabad

## Statement of Utilization of Funds

Sr. No.	Particulars	Allocated Amount	Amount Utilized till 31st March 2025	Amount Unutilized till 31st March 2025 (₹ in lakhs)	Remarks; if
		(₹ in lakhs)	(₹ in lakhs)		7-1
1	Working Capital	3820.00	3820.00	-	NIL
	Total	3820.00	3820.00		

