



# Sugandha Garg & Associates

(Company Secretaries)

Office: B-265, Second Floor, North Ex Mall, Sec-9, Rohini, Delhi-110085

Email Id: cssugandha2014@gmail.com, Tel: +91-9811502315

Peer Review No. 4928/2023

## CONSENT FROM THE PRACTICING COMPANY SECRETARY TO THE ISSUE

Date: September 26, 2025

To

### The Board of Directors

Shivchem Agro Limited

(Formerly known as Shivchem Agro Private Limited)

Unit No. 703, 704, Amba Tower, Plot No.2,

Community Centre, D.C Chowk, Sector-9,

Rohini Sec-11, North West Delhi, Delhi, India, 110085

Dear Sir,

**Sub: Proposed public issue (the “Issue”) of equity shares of Rs. 5/- each (the “Equity Shares”) of Shivchem Agro Limited (the “Company”)**

We hereby give our consent to use our certificate dated September 26, 2025 relating to capital structure, certificate dated September 26, 2025 relating to Structured Digital Database and certificate dated September 26, 2025 relating to details of the RoC e-forms filed after the due date with additional fees, in the Draft Red Herring Prospectus/ Red Herring Prospectus/ Prospectus (collectively as “**Issue Documents**”) to be filed with the Securities and Exchange Board of India (“**SEBI**”) and the Registrar of Companies, Delhi (“**RoC**”) and the Stock Exchange in India where the equity shares are proposed to be listed (“**Stock Exchange**”) and any other documents and materials in relation to the Issue pursuant to the provision of Section 26 & 32 of Companies Act, 2013 and Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended from time to time (“**SEBI ICDR Regulations**”) and to the other regulatory authorities as may be required.

We also consent to being referred as “*Expert*” as defined under Section 2(38) of the Companies Act, 2013 (the “**Act**”) in our capacity as Independent Company Secretary in respect of the certificate issued by us to be included in the Offer Documents of the Issuer and any references to us under Sections 26 and 32 or any other applicable provision of the Act, read with the ICDR Regulations. The following information in relation to us may be disclosed in such Offer Documents.

This letter does not impose any obligation on the Company to include in any Issue Documents, all or any part of the information with respect to which consent for disclosure is being granted pursuant to this letter.

|                                     |                                                      |
|-------------------------------------|------------------------------------------------------|
| <b>Name</b>                         | Sugandha Garg & Associates                           |
| <b>Address</b>                      | B-265, North Ex Mall, Second Floor, New Delhi-110085 |
| <b>Tel/Mobile</b>                   | +91-9811502315                                       |
| <b>Website</b>                      | N.A.                                                 |
| <b>Registration No.</b>             | S2015DE314400 (Unique Code Number)                   |
| <b>Registration/ Membership No.</b> | 34812                                                |
| <b>Peer Review No.:</b>             | 4928/2023                                            |



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|                       |                          |
|-----------------------|--------------------------|
| <b>E-mail</b>         | cssugandha2014@gmail.com |
| <b>Contact Person</b> | Sugandha                 |

We also authorize the Company to deliver a copy of this consent letter to SEBI, Stock Exchange, RoC and any other regulatory authorities as may be required, pursuant to the provisions of Section 26 and Section 32 of the Companies Act, 2013 and SEBI ICDR Regulations from time to time.

We undertake to keep strictly confidential the details of the proposed capital raising options, your request letter, and this consent letter.

We confirm that we will immediately communicate any changes in writing in the above information to the Book Running Lead Manager to the Issue (“**Book Running Lead Manager**”) until the date when the equity shares commence trading on the Stock Exchange. In the absence of any such communication from us, the Book Running Lead Manager can assume that there is no change to the above information until the equity shares commence trading on the Stock Exchange pursuant to the Issue.

This consent letter is for information and for inclusion (in part or full) in the Issue Documents or any other Issue related material and may be relied upon by the Company and Book Running Lead Manager in relation to the Issue.

Yours sincerely,

**For Sugandha Garg & Associates**  
**Company Secretaries**

**SUGA** Digitally signed  
by SUGANDHA  
Date:  
2025.09.26  
20:28:11 +05'30'  
**NDHA**

**(Sugandha)**

**Proprietor**

**ACS-34812**

**COP-12946**

**UDIN: A034812G001353426**

Place: New Delhi

Cc to:

**Shannon Advisors Private Limited**

Office No: 902,9th Floor

New Delhi House, 27 Barakhamba Road,

Connaught Palace, New Delhi, India, 1100011

**Chir Amrit Legal LLP**

6<sup>th</sup> Floor, Unique Destination,

Opp. Times of India, Tonk Road,

Jaipur – 302015, Rajasthan.