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POSITRON ENERGY LIMITED

Corporate Identification Number: U01403GJ2008PLC052932

Our Company was originally registered in the name of "Positron Energy Private Limited" and received a certificate of incorporation dated February 15, 2008 from the Assistant Registrar of Companies, Gujarat, Dadra and Nagar Haveli under The Companies Act, 1956. Later on, our Company was converted into a Public Limited Company pursuant to shareholders resolution passed at Extra-ordinary General Meeting of our Company held on December 23, 2023 and the name of our Company was changed to "Positron Energy Limited". A fresh Certificate of Incorporation consequent upon Conversion from Private Limited Company to Public Limited Company dated January 02, 2024 was issued by the Registrar of Companies, Ahmedabad. The Corporate Identification Number of our Company is U01403GJ2008PLC052932. For details of change in name and registered office of our Company, please refer to chapter titled "History and Corporate Matters" beginning on page no. 109 of this Draft Red Herring Prospectus.

Registered Office: Office No. 3, IT Tower-2, Ground Floor Infocity, Sector-7, Gandhinagar, Gujarat-382007.

Website: www.positron-india.com; **E-Mail:** secretarial@positron-india.com; **Telephone No:** +91 63537 65381

Company Secretary and Compliance Officer: Mr. Devang Ashvinkumar Shah

PROMOTERS OF OUR COMPANY: MR. RAJIV SHANKARANKUTTY MENON, MR. MANAV BAHRI AND MR. SUJIT K SUGATHAN

ADDENDUM TO THE DRAFT RED HERRING PROSPECTUS: NOTICE TO THE INVESTORS ("THE ADDENDUM")

INITIAL PUBLIC ISSUE OF UPTO 22,00,000 EQUITY SHARES OF FACE VALUE OF ₹ 10/- EACH OF POSITRON ENERGY LIMITED ("PEL", "POSITRON" OR THE "COMPANY" OR THE "ISSUER") FOR CASH AT A PRICE OF ₹ [●]/- PER EQUITY SHARE INCLUDING A SHARE PREMIUM OF ₹ [●]/- PER EQUITY SHARE (THE "ISSUE PRICE") AGGREGATING TO ₹ [●] LAKHS ("THE ISSUE"), OF WHICH [●] EQUITY SHARES OF FACE VALUE OF ₹ 10/- EACH FOR CASH AT A PRICE OF ₹ [●]/- PER EQUITY SHARE INCLUDING A SHARE PREMIUM OF ₹ [●]/- PER EQUITY SHARE AGGREGATING TO ₹ [●] LAKHS WILL BE RESERVED FOR SUBSCRIPTION BY MARKET MAKER TO THE ISSUE (THE "MARKET MAKER RESERVATION PORTION"). THE ISSUE LESS THE MARKET MAKER RESERVATION PORTION i.e. NET ISSUE OF [●] EQUITY SHARES OF FACE VALUE OF ₹ 10/- EACH AT A PRICE OF ₹ [●]/- PER EQUITY SHARE INCLUDING A SHARE PREMIUM OF ₹ [●]/- PER EQUITY SHARE AGGREGATING TO ₹ [●] LAKHS IS HEREIN AFTER REFERRED TO AS THE "NET ISSUE". THE ISSUE AND THE NET ISSUE WILL CONSTITUTE [●]% AND [●]%, RESPECTIVELY, OF THE POST ISSUE PAID UP EQUITY SHARE CAPITAL OF OUR COMPANY. THE FACE VALUE OF THE EQUITY SHARES IS ₹ 10/- EACH.

THE PRICE BAND AND THE MINIMUM BID LOT WILL BE DECIDED BY OUR COMPANY IN CONSULTATION WITH THE BRLM ADVERTISED IN ALL EDITIONS OF ENGLISH DAILY NEWSPAPER [●], ALL EDITIONS OF HINDI NATIONAL DAILY NEWSPAPER [●] AND GANDHINAGAR EDITION OF [●] REGIONAL NEWSPAPER (GUJARATI BEING REGIONAL LANGUAGE OF GANDHINAGAR WHERE OUR REGISTERED OFFICE IS LOCATED). AT LEAST TWO WORKING DAYS PRIOR TO THE ISSUE OPENING DATE AND SHALL BE MADE AVAILABLE TO THE NATIONAL STOCK EXCHANGE OF INDIA LIMITED ("NSE") FOR THE PURPOSE OF UPLOADING ON THEIR WEBSITE.

Potential Bidders may note the following:

- Under the heading titled "Risk Factor" beginning from page 28 of the Draft Red Herring Prospectus, certain risk factors shall be amended and/ or updated and/ or added, as provided beginning on page 2 of the Addendum to Draft Red Herring Prospectus.
- Under the heading titled "Business Overview" beginning from page 109 of the Draft Red Herring Prospectus and accordingly, certain information shall be amended and/ or updated and/ or added, as provided beginning on page 3 of the Addendum to Draft Red Herring Prospectus.
- Under the heading titled "Our Management" beginning from page 153 of the Draft Red Herring Prospectus and accordingly, certain information shall be amended and/ or updated and/ or added, as provided beginning on page 6 of the Addendum to Draft Red Herring Prospectus.

4. Under the heading titled “Government Approvals” beginning from page 193 of the Draft Red Herring Prospectus and accordingly, certain information shall be amended and/ or updated and/ or added, as provided beginning on page 7 of the Addendum to Draft Red Herring Prospectus.

The above addition and /or amendments are to be read in conjunction with the Draft Red Herring Prospectus and accordingly their references in the Draft Red Herring Prospectus stand amended pursuant to this Addendum. Please note that the changes pursuant to this Addendum will be appropriately included in the Red Herring Prospectus, as and when filed with the ROC, the SEBI and the Stock Exchange. All capitalised terms used in this Addendum shall, unless the context otherwise requires, have the meaning ascribed to them in the Draft Red Herring Prospectus.

The Addendum is filed with NSE and shall be made the respective websites NSE i.e. www.nseindia.com ; Book Running Lead Manager at www.beelinemb.com and the Issuer Company at: www.positron-india.com

All capitalized terms used in the Addendum shall, unless the context otherwise requires, have the meaning ascribed to them in the Draft Red Herring Prospectus.

The Equity Shares have not been and will not be registered under the U.S. Securities Act or any state securities laws in the United States, and unless so registered, and may not be offered or sold within the United States, except pursuant to an exemption from, or in a transaction not subject to, the registration requirements of the U.S. Securities Act and applicable U.S. state securities laws. Accordingly, the Equity Shares are being offered and sold outside the United States in offshore transactions in reliance on Regulation S and the applicable laws of each jurisdictions where such offers and sales are made.

The Equity Shares have not been and will not be registered, listed or otherwise qualified in any other jurisdiction outside India and may not be issued or sold, and Bids may not be made by persons in any such jurisdiction, except in compliance with the applicable laws of such jurisdiction.

On behalf of Positron Energy Limited

Sd/-

Place: Gandhinagar

Rajiv Shankarankutty Menon

Date: June 29, 2024

Managing Director

BOOK RUNNING LEAD MANAGER	REGISTRAR TO THE OFFER
	
BEELINE CAPITAL ADVISORS PRIVATE LIMITED SEBI Registration Number: INM000012917 Address: B 1311-1314 Thirteenth Floor Shilp Corporate Park, Rajpath Rangoli Road Thaltej Ahmedabad Gujarat 380054 India. Telephone Number: +91 79 4918 5784 Email Id: mb@beelinemb.com Investors Grievance Id: ig@beelinemb.com Website: www.beelinemb.com Contact Person: Mr. Nikhil Shah CIN: U67190GJ2020PTC114322	LINK INTIME INDIA PRIVATE LIMITED SEBI Registration Number: INR000004058 Address: C- 101, 1 st Floor, 247 Park, L.B.S Marg, Vikhroli (West), Mumbai - 400083, Maharashtra, India Telephone: +91 810 811 4949, Fax: +91 22 49186060 Email: positronenergy.ipo@linkintime.co.in Investor Grievance E-Mail: positronenergy.ipo@linkintime.co.in Website: www.linkintime.co.in Contact Person: Mr. Shanti Gopalkrishnan CIN: U67190MH1999PTC118368

Positron Energy Limited is proposing, subject to applicable statutory and regulatory requirements, receipt of requisite approvals, market conditions and other considerations, to make an initial public offer of its Equity Shares and has been filed the Draft Red Herring Prospectus dated March 08, 2024 with NSE. The Draft Red Herring Prospectus and the Addendum to the Draft Red Herring Prospectus shall be available on the respective websites NSE i.e. www.nseindia.com; Book Running Lead Manager at www.beelinemb.com and the Issuer Company at: www.positron-india.com. Potential Applicants/Bidders should note that investment in equity shares involves a high degree of risk and details relating to such risk, please see the section entitled "Risk Factors" beginning on page 28 of the Draft Red Herring Prospectus. Potential Applicants/Bidders should not reply on the Draft Red Herring Prospectus filed with NSE for making any investment decision.

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RISK FACTORS

a) **Following Risk factor has been added as Risk Factor No. 40 as follows:**

40 Our company has encountered challenges in meeting the designated timelines for filing statutory returns, a circumstance that carries significant implications for our financial standing.

There have been delays in filing GST Returns and EPF returns by our Company, as mentioned in below table, which have all been paid as on the date of this Draft Red Herring Prospectus.

EPF Payments-

Financial Year	Total Amount of All Establishments Paid (Amount in Lakhs)	Total No. of Establishments	Establishments With Delayed Payments
2023-2024	19.60	1	1
2022-2023	18.25	1	1
2021-2022	4.62	1	1
2020-2021	0.95	1	1

GST Returns:

Financial Year	Return Type	Total Number Of Establishments	Establishments With Delayed Filings
2023-2024	2	1	2023-2024
2022-2023	1	1	2022-2023
2021-2022	1	1	2021-2022
2020-2021	1	1	2020-2021
2019-2020	1	-	2019-2020
2018-2019	1	1	2018-2019
2017-2018	1	1	2017-2018

These delays were primarily due to the COVID-19, internal and technical issues. We have since taken steps such as channelling more resources towards improving our administrative systems and training our staff to rectify such delays. However, there can be no assurance that such delays may not arise in the future. This may lead to financial penalties from respective government authorities. While we have been required to make payment of fines/ penalties for delays in payment of such statutory dues, wherever applicable, these have not been material in nature. However, we cannot assure you that we will not be subject to such penalties and fines in the future which may have a material adverse impact on our financial condition and cash flows.

BUSINESS OVERVIEW

BUSINESS PROCESS

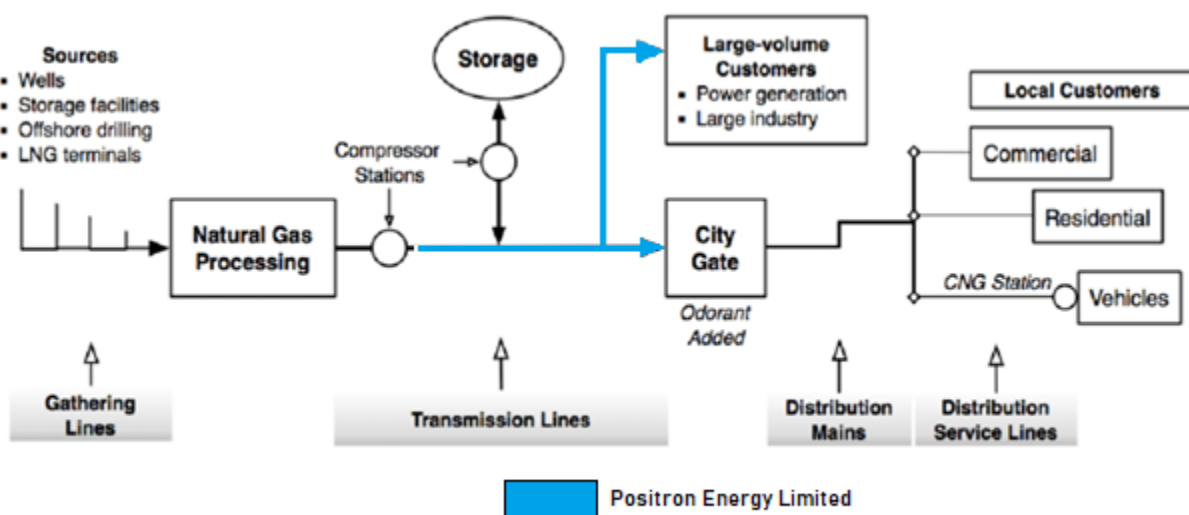
Following strike-off words shall be removed from the Red Herring Prospectus to be filed with SEBI, ROC, and Exchange.

Process Flow Chart: LNG Distribution Solution for Industries and Commercial Clusters:

- I. **Project Initiation and Planning:** Conducting thorough market analysis to identify potential areas and industries for LNG distribution. Performing feasibility studies to assess the viability and requirements of LNG distribution in specific regions. Developing comprehensive project plans, including timelines and resource allocation.
- II. **Equipment Selection and Configuration:** Assessing the required capacities for equipment such as storage tanks, transportation vehicles, and distribution systems. Selecting and configuring ~~state-of-the-art~~ equipment and technologies for efficient LNG handling and distribution.

Following shall be added in the Red Herring Prospectus to be filed with SEBI, ROC, and Exchange.

2. Natural Gas Aggregation and Sales



Company is dealing with all major Government PSU entities operating in the Oil and Gas Sector across all its business Segments. Most of these entities are governed by the Central/State Government Procurement Policies which have a pre-requisite qualification criterion for participation. Company qualifies under all such technical qualification criteria across both Management Consulting & Technical Services business based on its experience. Company has also been availing the benefits under the MSME segment as per the Public Procurement Policy for all its Consulting and Technical Services Business.

Process to procure such tenders

For the Gas Aggregation and Sales Business, Company deals with all major Domestic Gas Suppliers. The Domestic Gas bidding is conducted by the Government PSU entities as per the directives of the Director General of Hydrocarbons and the Policies laid down by the Ministry of Petroleum & Natural Gas on their respective websites (example - <https://gaitenders.in/Gaitenders/>, <https://eps.buyjunction.in/OEPS/security/getDGHSignInAction.do>, <https://eprocure.gov.in/>, <https://www.bharatpetroleum.in/tenders/>). As part of business strategy, it qualifies across all the criteria laid under the present directives for participation in such tenders.

Following shall be added in the Red Herring Prospectus to be filed with SEBI, ROC, and Exchange.

OUR MAJOR COMPLETED PROJECTS OF MANAGEMENT & CONSULTANCY SERVICES

<u>Sr. No</u>	<u>Name of Client</u>	<u>Description of the Work(s)</u>	<u>Contract/WO No.</u>	<u>Contract Value without GST (₹ in lakhs)</u>	<u>Letter of Acceptance</u>
<u>1</u>	<u>Maharashtra Natural Gas Ltd</u>	<u>Determining capacity of City or Local Natural Gas Distribution Network</u>	<u>4500004124</u>	<u>3.51</u>	<u>24/09/2021</u>
<u>2</u>	<u>Maharashtra Natural Gas Ltd</u>	<u>Integrity Management System (IMS) documents for IMS Accrediation audit plan in year 2022 of Pune, Nashik, Sindhudurg and Ramnagara GA</u>	<u>4500004615</u>	<u>2.984</u>	<u>13/05/2022</u>
<u>3</u>	<u>Bagpat Green Energy Pvt Ltd</u>	<u>Deployment of Outsourced Engineers at Bagpat GA</u>	<u>5600000699/R</u>	<u>16.80</u>	<u>08/03/2022</u>
<u>4</u>	<u>Hindustan Petroleum Corporation Ltd</u>	<u>Detailed feasibility report Bihar Jharkhand, Detailed feasibility report Rajasthan and Detailed feasibility report West Bengal</u>	<u>22000696-OQ-10157</u>	<u>23.54</u>	<u>29/07/2022</u>
<u>5</u>	<u>Adani</u>	<u>TOR of Intake Pipeline Alternate route Survey for Laying MS pipeline in place of GRP pipeline at Raipur Energen Limited, 2X685 MW TTP Village – Raikheda</u>	<u>5700310959</u>	<u>3.35</u>	<u>26/06/2022</u>
<u>6</u>	<u>Adani Gas Ltd</u>	<u>Determination of Steel pipeline network Capacity and Submission of report</u>	<u>5700282766</u>	<u>4.00</u>	<u>19/02/2020</u>
<u>7</u>	<u>Gujarat Gas Ltd, Gujarat Zone-1,2,3</u>	<u>Construction Supervision services</u>	<u>5700002449/50</u>	<u>45.88</u>	<u>28/12/2022</u>
<u>8</u>	<u>Gujarat Gas Ltd, Maharashtra</u>	<u>Construction Supervision services</u>	<u>5700002454</u>	<u>2.93</u>	<u>29/12/2022</u>
<u>9.</u>	<u>Sabarmati Gas Limited</u>	<u>Appointment of Consultant to model and Simulate SGL natural gas Pipeline networks for integrity checking and suggestion to sustain the business with existing network for next 5 years".</u>	<u>4900004793</u>	<u>5.90</u>	<u>10/02/2022</u>
<u>10</u>	<u>Sabarmati Gas Limited</u>	<u>Appointment of Consultant to model and Simulate SGL natural gas Pipeline networks for integrity checking and suggestion to sustain the business with existing network for next 5 years"</u>	<u>4600004389</u>	<u>9.44</u>	<u>20/11/2021</u>
<u>11.</u>	<u>HPCL</u>	<u>Detailed feasibility report</u>	<u>GEMC-511687742720414</u>	<u>23.54</u>	<u>29/07/2022</u>
<u>12.</u>	<u>Adani</u>	<u>Consultant to conduct Primary Surveys (Demand Assessment Survey and Reconnaissance Survey)</u>	<u>5711003245</u>	<u>5.20</u>	<u>15/07/2022</u>

<u>Sr. No</u>	<u>Name of Client</u>	<u>Description of the Work(s)</u>	<u>Contract/WO No.</u>	<u>Contract Value without GST (₹ in lakhs)</u>	<u>Letter of Acceptance</u>
		<u>to develop Gas Distribution Network Infrastructure facilities at APSEZ, Mundra by Adani Total Gas Ltd.</u>			
<u>13</u>	<u>Gujarat Gas limited</u>	<u>Operations & Maintenance of De-Compression Skid (DCS) Stations at various locations/clusters of GGL</u>	<u>GGL/AHM/PRO C/ LOA/2021-22/195</u>	<u>675</u>	<u>05/10/2021</u>
<u>14.</u>	<u>Think Gas Distribution Pvt Ltd</u>	<u>Quality Management & Inspection services for CGD Projects</u>	<u>PEPL/TSERVIC ES/ 2021/22</u>	<u>1.90</u>	<u>05/01/2021</u>
<u>15</u>	<u>Gail Gas limited</u>	<u>Consultancy Services</u>	<u>GAILGas/Noida/ NKG/560000083 7/ 21-22/54</u>	<u>23.75</u>	<u>16/11/2021</u>
<u>16.</u>	<u>Sabarmati Gas Limited</u>	<u>Annual Rate Contract For Appointment of Consultant to model and simulate SGL Natural gas pipeline Networks for Integrity Checking and Suggestion to sustain the business With existing network For Next 5 years</u>	<u>5700000943</u>	<u>15.34</u>	<u>05/08/2021</u>
<u>17</u>	<u>Gujarat State Petronet limited</u>	<u>Hiring Of PMC/EC Services For Appointment of O&M Contractor For upcoming MDPE pipeline in Sanand GIDC</u>	<u>LOA-02/354</u>	<u>7.83</u>	<u>15/02/2021</u>
<u>18.</u>	<u>Maharashtra Natural Gas Ltd</u>	<u>Availing Consultancy Services for Submitting Detailed Report to PNHRB</u>	<u>4500003466</u>	<u>4.19</u>	<u>21/11/2020</u>
<u>19.</u>	<u>Adani Gas ltd</u>	<u>Determination of Steel pipeline network Capacity and Submission of report</u>	<u>5700282839</u>	<u>4.00</u>	<u>02/03/2020</u>

OUR MANAGEMENT

RELATIONSHIP BETWEEN THE DIRECTORS

Following strike-off words shall be removed from the Red Herring Prospectus to be filed with SEBI, ROC, and Exchange.

There is no relationship between any of the Directors of our Company except as given below as on date of filling of Red Herring Prospectus:

Sr. No.	Name of Director	Designation	Relation
1.	Mr. Sujit K Sugathan	Whole Time Director	He is brother-in-law of Mr. Suresh Ayyappankutty, Independent Director Non-Executive Director of the company.
2.	Mr. Suresh Ayyappankutty	Independent Director Non-Executive Director	He is brother-in-law of Mr. Sujit K Sugathan who is a Whole Time Director & CFO of the company.

GOVERNMENT APPROVALS

IV. APPROVALS OR LICENSES APPLIED BUT NOT RECEIVED

Sr. No	Description	Application No.	Application date	Status
2.	Application for Dual fuel Kit	<u>PEPL/LNGKit/2022/020</u>	<u>November 23, 2022</u>	<u>Awaiting for final Approval from ARAI</u>

III. OTHER APPROVALS

We require various approvals and/ or licenses under various rules and regulations to conduct our business. Some of the material approvals required by us to undertake our business activities are set out below:

A. TAX RELATED APPROVALS:

Sr. No	Description	Applicable laws	Authority	Registration number	Date of Certificate	Date of Expiry
<u>1.</u>	Permanent Account Number (PAN)	Income Tax Act, 1961	Income Tax Department, Government of India	AAECP5492Q	February 15, 2008	Valid until cancelled
<u>2.</u>	Tax Deduction Account Number (TAN)	Income Tax Act, 1961	Income Tax Department, Government of India	AHMP06068G	April 07, 2008	Valid until cancelled
<u>3.</u>	Certificate of Registration of Goods and Services Tax (Gujarat)	Centre Goods and Services Tax Act, 2017	Government of India	24AAECP5492Q1ZQ	Issued on September 26, 2017 w.e.f. July 01, 2017	Valid until cancelled
<u>4.</u>	Certificate of Registration of Profession Tax (Jharkhand)	Jharkhand Tax on Professions, Trades, Callings and Employments Act, 2011	Government of Jharkhand, Commercial Taxes Department	20581409270	July 20, 2019	Valid until cancelled
<u>5.</u>	Certificate of Enrolment of Profession Tax (Gujarat)	Gujarat State-Tax on Professions, Trades, Callings and Employments Act, 1976	Gandhinagar Municipal Corporation	PEC080004791	November 01, 2019	Valid until cancelled
<u>6.</u>	Certificate of Registration of Profession Tax (Gujarat)	Gujarat State-Tax on Professions, Trades, Callings and Employments Act, 1976	Gandhinagar Municipal Corporation	PRC080000878	November 01, 2019	Valid until cancelled
<u>7.</u>	Certificate of Enrolment of Profession Tax (Maharashtra)	Maharashtra State-Tax on Professions, Trades, Callings and Employments Act, 1975	Maharashtra Sales Tax Department	99744765418P	February 21, 2024 w.e.f. April 01, 2023	Valid until cancelled

Sr. No	Description	Applicable laws	Authority	Registration number	Date of Certificate	Date of Expiry
<u>8.</u>	Certificate of Registration of Profession Tax (Maharashtra)	Maharashtra State-Tax on Professions, Trades, Callings and Employments Act, 1975	Maharashtra Sales Tax Department	27242139830P	February 21, 2024 w.e.f. May 01, 2023	Valid until cancelled
<u>9.</u>	Certificate of Registration of Value Added Tax	Gujarat Value Added Tax Act, 2003	Government of Gujarat, Commercial Taxes Department	24060307806	Issued on May 05, 2022 w.e.f. April 19, 2022	Valid until cancelled
<u>10.</u>	Certificate of Registration of Value Added Tax	Maharashtra Value Added Tax Act, 2002	Maharashtra Sales Tax Department	27242139830V	Issued on May 26, 2023 w.e.f. May 18, 2023	Valid until cancelled
<u>11.</u>	Certificate of Registration of The Central Sales Tax (Registration and Turnover) Rules, 1957	Section 7(1)/7(2) of the Central Sales Tax Act, 1956 along with Central Sales Tax (registration and Turnover) Rules, 1957	Government of Gujarat, Commercial Taxes Department	24560307806	May 27, 2022	Valid until cancelled
<u>12.</u>	Certificate of Registration of The Central Sales Tax (Registration and Turnover) Rules, 1957	Section 7(1)/7(2) of the Central Sales Tax Act, 1956 along with Central Sales Tax (registration and Turnover) Rules, 1957	Maharashtra Sales Tax Department	TIN: 27242139830C	Issued on June 01, 2023 w.e.f. May 29, 2023	Valid until cancelled

B. LABOUR LAW RELATED APPROVALS:

Sr. No	Description	Applicable laws	Authority	Registration number	Date of Certificate	Date of Expiry
<u>1.</u>	Registration under Employees' Provident Funds	Employees (Provident Fund and Miscellaneous Provisions) Act, 1952	Employees' Provident Fund Organisation	GJAHD2100612000	May 25, 2020	Valid until cancelled
<u>2.</u>	ESI Registration	Employee State Insurance Act, 1948	Employees' State Insurance Corporation	37001159490000606	April 14, 2020	Valid until cancelled
<u>3.</u>	Certificate of Registration of Delhi Shops and Establishment	Delhi Shops and Establishments Act, 1954	Department of Labour, Government of NCT of Delhi	2024021395	February 03, 2024	Valid until Cancelled

Sr. No	Description	Applicable laws	Authority	Registration number	Date of Certificate	Date of Expiry
<u>4.</u>	Application of Intimation for Maharashtra Shops and Establishment	Maharashtra Shops and Establishments Act, 2017	Labour Department, Pune	101296832403	<u>February 13, 2024</u>	Valid until Cancelled
<u>5.</u>	LIN Certification	Shram Suvidha Scheme under various Labour Laws	Ministry of Labour & Employment	2-3807-0538-5	August 29, 2023	Valid until cancelled

C. BUSINESS OPERATIONS RELATED APPROVALS:

Sr. No	Description	Applicable laws	Authority	Registration number	Date of Certificate	Date of Expiry
<u>1.</u>	LEI Certificate	RBI Guidelines	LEI Register India Private Limited	9845008808F96F4C4572	February 24, 2022	February 24, 2028
<u>2.</u>	Udyog Aadhaar Registration Certificate	MSME Development Act, 2006	Ministry of Micro Small & Medium Enterprises, Government of India	GJ01D0052338	December 12, 2018	Valid until cancelled
<u>3.</u>	Udyam Registration Certificate	MSME Development Act, 2006	Ministry of Micro Small & Medium Enterprises, Government of India	UDYAM-GJ-09-0001054	September 08, 2020 (updated on February 01, 2024)	Valid until cancelled
<u>4.</u>	Certificate of Importer-Exporter Code (IEC)	Foreign Trade (Development and Regulation) Act, 1992	Government of India (Ministry of Commerce and Industry, Directorate General of Foreign Trade)	AAECP5492Q	October 08, 2020	Valid until cancelled

D. QUALITY CERTIFICATIONS:

Sr. No	Nature of Registration	Issuing Authority	Certificate No.	Date of Issue	Date of Expiry
1.	Certificate of Registration for Quality Management System of the Company under ISO 9001:2015 with the following scope: Providing Consultancy Services, O&M Services to Oil & Gas Sector.	Magnitude Management Services Pvt. Ltd.	23EQKC06	March 22, 2023	March 21, 2026
2.	Certificate of Registration for Occupational Health & Safety Management System of the Company under ISO 45001:2018 with the following	Progressive International Certifications Ltd.	PICL/OHSMS/0320/3717	March 11, 2023	March 10, 2026

Sr. No	Nature of Registration	Issuing Authority	Certificate No.	Date of Issue	Date of Expiry
	scope: Providing Consultancy Services, O&M Services to Oil & Gas Sector.				

E. APPROVALS OBTAINED/APPLIED IN RELATION TO INTELLECTUAL PROPERTY RIGHT (IPR)

Sr. No.	Description	Registration Number/Mark/Label	Class	Applicable Laws	Issuing Authority	Date of Issue	Date of Expiry
<u>1.</u>	Registration for Trade Mark	4931619 (Positron Energy Private Limited)	35	Trade Marks Act, 1999	Trade Marks Registry	April 02, 2021	April 01, 2031

F. THE DETAILS OF DOMAIN NAME REGISTERED ON THE NAME OF THE COMPANY:

Sr. No.	Domain Name	Registrar/IANA ID	Creation Date	Expiry Date
<u>1.</u>	positron-india.com	PDR Ltd./303	December 13, 2007	December 13, 2024

DECLARATION

We, the undersigned, hereby certify and declare that all the relevant provisions of the Companies Act, 2013 and the guidelines issued by the Government of India or the regulations issued by Securities and Exchange Board of India, established under Section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in this Addendum to Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities and Exchange Board of India Act, 1992 or rules made there under or regulations issued there under, as the case may be. We further certify that all statements in this Addendum to Draft Red Herring Prospectus are true and correct.

Signed by the Directors of the Company:

Name	Designation	Signature
Dr. Safalta S Gupta	Chairman & Independent Director	sd/-
Mr. Rajiv Shankarankutty Menon	Managing Director	sd/-
Mr. Manav Bahri	Whole Time Director & CEO	sd/-
Mr. Sujit K Sugathan	Whole Time Director & CFO	sd/-
Mr. Suresh Ayyappankutty	Non-Executive Director	sd/-
Mr. Bibhasendu Mohapatra	Independent Director	sd/-

Signed by:

Name	Designation	Signature
Mr. Devang Ashvinkumar Shah	Company Secretary & Compliance Officer	sd/-

Place: Gandhinagar

Date: June 29, 2024