

7/Govt/SE/2025-26/0037

10th November, 2025

National Stock Exchange of India Limited
Exchange Plaza, 5th Floor,
Plot No. C/1, G Block, Bandra-Kurla
Complex, Bandra (East),
Mumbai 400 051
Trading Symbol: PAKKA

BSE Limited
Department of Corporate Service
Phiroze Jeejeebhoy Towers
25th Floor, Dalal Street
Mumbai - 400 001
Scrip Code: 516030

Sub: Statement on Deviation or Variation of funds under Regulation 32 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”)

Dear Sir/Madam,

Pursuant to Regulation 32 of the SEBI Listing Regulations and SEBI Circular No. CIR/CFD/CMD1/162/2019 dated December 24, 2019, please note that there are no deviation(s) or variation(s) in respect of the utilization of the proceeds of the Preferential Issue of the Company during the 2nd quarter and half year ended 30th September, 2025, as mentioned in the object clause of the Notice dated 6th August, 2024. Please find enclosed herewith a statement in this regard.

The aforesaid statement has been reviewed by the Audit Committee in its meeting held on 6th November, 2025 and taken on record by the Board at their meetings held on 8th November, 2025.

Kindly take the above information on record. The information in the above notice is also available on the website of the Company <https://www.pakka.com>.

Kindly bring it to the notice of all concerned.

Thanking you,

Yours faithfully,
for Pakka Limited

Sachin Kumar Srivastava
Company Secretary & Legal Head

Encl.: as above

STATEMENT OF DEVIATION OR VARIATION IN UTILIZATION OF FUNDS RAISED

Name of listed entity	Pakka Limited					
Mode of Fund Raising	Preferential Issue					
Date of Raising Funds	(October 14, 2024) (Date of Allotment)					
Amount Raised	Issue of ₹244.80 Crore ¹					
Report filed for Quarter ended	September 30, 2025					
Monitoring Agency	Applicable					
Monitoring Agency Name, if applicable	Care Ratings Limited					
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 Unitholders	Not Applicable					
If Yes, Date of Unitholders Approval	Not Applicable					
Explanation for the Deviation / Variation	Not Applicable					
Comments of the Audit Committee after review	None					
Comments of the auditors, if any	None					
Set forth below are objects for which funds have been raised in the IPO and details of deviation, if any, in the following table:						
Original Object	Modified Object, if any	Original Allocation (₹ in Crores)	Modified Allocation, if any	Funds Utilised (₹ in Crores)	Amount of Deviation/ Variation for Quarter according to applicable object	Remarks, if any
Investment in Plant & Machinery (Jagruti Project)	-	190	-	129.55	NIL	-
Investment in Subsidiary	-	30	-	17.00	NIL	-
General corporate purposes	-	24.80	-	24.80	NIL	-
Total	-	244.80	-	171.35	-	-

Notes:

- Company had come out with preferential issue of 54 lakh equity shares aggregating to Rs. 146.88 crore @ Rs. 272/- per share including securities premium of Rs.262 per share to the non-promoters. Company had also come out with preferential share warrants issue of up to 36 lakh fully convertible warrants (convertible into equal number of equity shares) aggregating to Rs. 97.92 crore, at an issue price of Rs. 272 per warrant (including share premium of Rs. 262 per warrant) including warrant subscription price of Rs. 68.00 and the warrant exercise price of Rs. 204.00 each on preferential basis to the persons/entities belonging to non-promoter category ("Allotees"). Total amount to be raised from the preferential issue is Rs. 244.80 crore.
- Till September 30, 2025, the warrants have been fully subscribed from the proposed allottees (i.e. non-promoter category) with 25% of the issue price received as upfront payment aggregating to Rs. 24.48 crore at the rate of Rs. 68 per warrant and balance 75% of the warrants exercise price to be received within 18 months from the date of allotment. The same remains fully unutilized till Q3FY25. The preferential issue of equity shares has been fully subscribed, raising the entire amount of Rs. 146.88 crore.

Deviation or variation could mean:

- Deviation in the objects or purposes for which the funds have been raised or
- Deviation in the amount of funds actually utilized as against what was originally disclosed or
- Change in terms of a contract referred to in the fund raising document i.e. prospectus, letter of offer. Etc.

Yours faithfully,
for Pakka Limited

Sachin Kumar Srivastava
Company Secretary & Legal Head

Formerly known as Yash Pakka Limited

Pakka Limited, Yash Nagar, Ayodhya 224135 (U.P.), India
+91-52782-58174 | connect@pakka.com
www.pakka.com

Registered Office: 312, Plaza Kalpana
Society, 24/147, B-49, Birhana Road, Kanpur,
Uttar Pradesh -208001
CIN: L24231UP1981PLC005294

No. CARE/NRO/GEN/2025-26/1111

The Board of Directors

Pakka Limited

312, Plaza Kalpana Society,
24/147, B-49, Birhana Road,
Kanpur – 208001, Uttar Pradesh, India

November 10, 2025

Dear Sir/Ma'am,

Monitoring Agency Report for the quarter ended September 30, 2025 - in relation to the Preferential issue of Equity shares and Fully Convertible warrants of Pakka Limited ("the Company")

We write in our capacity of Monitoring Agency for the Preferential Issue for the amount aggregating to Rs. 244.80 crore (Preferential issue of equity share: Rs.146.88 crore & Preferential issue of fully convertible share warrants: Rs.97.92 crore) of the Company and refer to our duties cast under Regulation 162A of the Securities & Exchange Board of India (Issue of Capital & Disclosure Requirements) Regulations.

In this connection, we are enclosing the Monitoring Agency Report for the quarter ended September 30, 2025, as per aforesaid SEBI Regulations and Monitoring Agency Agreement dated October 09, 2024.

Request you to kindly take the same on records.

Thanking you,
Yours faithfully,

Sandeep Aggarwal

Sandeep Aggarwal

Associate Director

sandeep.aggarwal@careedge.in

CARE Ratings Limited

9th Floor, C-001/A2, Berger Towers, Sector-16B,
Noida, Gautam Budh Nagar, Uttar Pradesh - 201 301
Phone: +91-120-445 2000

4th Floor, Godrej Coliseum, Somaiya Hospital,
Road, Off Eastern Express Highway, Sion
(East), Mumbai - 400 022
Phone: +91-22-6754 3456
Email: care@careedge.in • www.careedge.in

CIN-L67190MH1993PLC071691

Report of the Monitoring Agency

Name of the issuer: Pakka Limited

For quarter ended: September 30, 2025

Name of the Monitoring Agency: CARE Ratings Limited

(a) Deviation from the objects: Nil

(b) Range of Deviation: Not applicable

Declaration:

We declare that this report provides an objective view of the utilization of the issue proceeds in relation to the objects of the issue based on the information provided by the Issuer and information obtained from sources believed by it to be accurate and reliable. The MA does not perform an audit and undertakes no independent verification of any information/ certifications/ statements it receives. This Report is not intended to create any legally binding obligations on the MA which accepts no responsibility, whatsoever, for loss or damage from the use of the said information. The views and opinions expressed herein do not constitute the opinion of MA to deal in any security of the Issuer in any manner whatsoever. Nothing mentioned in this report is intended to or should be construed as creating a fiduciary relationship between the MA and any issuer or between the agency and any user of this report. The MA and its affiliates also do not act as an expert as defined under Section 2(38) of the Companies Act, 2013.

The MA or its affiliates may have credit rating or other commercial transactions with the entity to which the report pertains and may receive separate compensation for its ratings and certain credit related analyses. We confirm that there is no conflict of interest in such relationship/interest while monitoring and reporting the utilization of the issue proceeds by the issuer, or while undertaking credit rating or other commercial transactions with the entity.

We have submitted the report herewith in line with the format prescribed by SEBI, capturing our comments, where applicable. There are certain sections of the report under the title "Comments of the Board of Directors", that shall be captured by the Issuer's Management / Audit Committee of the Board of Directors subsequent to the MA submitting their report to the issuer and before dissemination of the report through stock exchanges. These sections have not been reviewed by the MA, and the MA takes no responsibility for such comments of the issuer's Management/Board.

Sandeep Agg

Signature:

Name and designation of the Authorized Signatory: Sandeep Aggarwal

Designation of Authorized person/Signing Authority: Associate Director

CARE Ratings Limited

9th Floor, C-001/A2, Berger Towers, Sector-16B,
Noida, Gautam Budh Nagar, Uttar Pradesh - 201 301
Phone: +91-120-445 2000

4th Floor, Godrej Coliseum, Somaiya Hospital.
Road, Off Eastern Express Highway, Sion
(East), Mumbai - 400 022
Phone: +91-22-6754 3456
Email: care@careedge.in • www.careedge.in

CIN-L67190MH1993PLC071691

1) Issuer Details:

Name of the issuer : Pakka Limited
Name of the promoter : Mr. Ved Krishna
Industry/sector to which it belongs : Paper, Forest & Jute Products - Paper & Paper Products

2) Issue Details

Issue Period (Equity shares) : October 04, 2024 to October 11, 2024 (Date of Allotment: October 14, 2024)
Issue Period (Share warrants) : 18 months from the date of allotment i.e. April 13, 2026
Type of issue (public/rights) : Preferential Issue
Type of specified securities : Equity shares and fully convertible share warrants
IPO Grading, if any : Not Applicable
Issue size of equity shares (in crore) : Rs. 146.88 crore
Issue size of share warrants (in crore) : Rs. 97.92 crore

CARE Ratings Limited

9th Floor, C-001/A2, Berger Towers, Sector-16B,
Noida, Gautam Budh Nagar, Uttar Pradesh - 201 301
Phone: +91-120-445 2000

4th Floor, Godrej Coliseum, Somaiya Hospital
Road, Off Eastern Express Highway, Sion (East),
Mumbai - 400 022
Phone: +91-22-6754 3456
Email: care@careedge.in • www.careedge.in

3) Details of the arrangement made to ensure the monitoring of issue proceeds:

Particulars	Reply	Source of information / certifications considered by Monitoring Agency for preparation of report	Comments of the Monitoring Agency	Comments of the Board of Directors
Whether all utilization is as per the disclosures in the Offer Document?	Yes	Management Certificate, Chartered Accountant Certificate*, Bank statements, ^Special Resolution copy	All proceeds from the preferential issue have been utilized as per the objectives mentioned in the shareholder resolution, as supported by management and CA certificate. A resolution passed in the 45th Annual General Meeting of the company dated September 30, 2025, where members of the company have approved the extension in timeline for exercise share warrants from existing period of 12 months to 18 months from the allotment date. All other terms and conditions shall remain unchanged as per the earlier special resolution passed at the extra ordinary general meeting dated August 29, 2024.	No Comment received
Whether shareholder approval has been obtained in case of material deviations# from expenditures disclosed in the Offer Document?	No material deviation	Management Certificate	Not Applicable	No Comment received
Whether the means of finance for the disclosed objects of the issue have changed?	No	Management Certificate	Not Applicable	No Comment received
Is there any major deviation observed over the earlier monitoring agency reports?	Yes	Management certificate, Chartered Accountant certificate*, Bank statements, BSE / NSE website	The company's share price is currently trading significantly below the share warrant exercise price. This may result in subscribers allowing the warrants to lapse, potentially impacting the viability of the objectives. Shares of Pakka Ltd are currently trading at Rs. 140.55 (as on November 05, 2025) in comparison to share price of Rs.209.60 as on June 30, 2025.	No Comment received
Whether all Government/statutory approvals related to the object(s) have been obtained?	Yes	Management certificate	As per management certificate, the company has obtained all the requisite approvals.	No Comment received

CARE Ratings Limited

9th Floor, C-001/A2, Berger Towers, Sector-16B,
Noida, Gautam Budh Nagar, Uttar Pradesh - 201 301
Phone: +91-120-445 2000

4th Floor, Godrej Coliseum, Somaiya Hospital
Road, Off Eastern Express Highway, Sion (East),
Mumbai - 400 022
Phone: +91-22-6754 3456
Email: care@careedge.in • www.careedge.in

Particulars	Reply	Source of information / certifications considered by Monitoring Agency for preparation of report	Comments of the Monitoring Agency	Comments of the Board of Directors
Whether all arrangements pertaining to technical assistance/collaboration are in operation?	NA	Management Certificate	Not Applicable, as management has confirmed that no technical assistance is required for the objects of the issue.	No Comment received
Are there any favorable/unfavorable events affecting the viability of these object(s)?	Yes	Management Certificate, Bombay Stock Exchange website	The company's share price is currently trading significantly below the warrant exercise price. This may result in subscribers allowing the warrants to lapse, potentially impacting the viability of the objectives. During Q1FY26, the company reported a decline in revenue to Rs.82.24 crore as against Rs.92.16 crore in Q4FY25, primarily due to a plant shutdown between June 16, 2025, and July 24, 2025, undertaken to support the expansion of paper machine 3 and the pulp machine as part of the phased rollout of Project Jagriti. The shutdown led to zero pulp sales during the period, adversely affecting both revenue and profit margins, while Net Sales Realizations (NSR) also trended downward in line with broader industry dynamics.	No Comment received
Is there any other relevant information that may materially affect the decision making of the investors?	Yes	Management Certificate, Bombay Stock Exchange website	As per the BSE announcement dated August 13, 2025, Jagdeep Hira, Managing Director and designated Key Managerial Personnel of the Company, has submitted his resignation citing health-related concerns, which has been duly accepted by the Company's management. He has been replaced by Ved Krishna (Promoter & Executive).	No Comment received

*Chartered Accountant Certificate from CNK & Associates LLP (Statutory Auditor) dated November 04, 2025.

#Where material deviation may be defined to mean:

- Deviation in the objects or purposes for which the funds have been raised
- Deviation in the amount of funds actually utilized by more than 10% of the amount projected in the offer documents.

CARE Ratings Limited

9th Floor, C-001/A2, Berger Towers, Sector-16B,
Noida, Gautam Budh Nagar, Uttar Pradesh - 201 301
Phone: +91-120-445 2000

4th Floor, Godrej Coliseum, Somaiya Hospital
Road, Off Eastern Express Highway, Sion (East),
Mumbai - 400 022
Phone: +91-22-6754 3456
Email: care@careedge.in • www.careedge.in

4) Details of objects to be monitored:

(i) Cost of objects –

Sr. No	Item Head	Source of information / certifications considered by Monitoring Agency for preparation of report	Original cost (as per the Offer Document) in Rs. Crore	Revised Cost in Rs. Crore	Comments of the Monitoring Agency	Comments of the Board of Directors		
						Reason for cost revision	Proposed financing option	Particulars of -firm arrangements made
1	Investment in Plant & Machinery (Jagruti Project)	Management Certificate, Chartered Accountant Certificate*, Shareholder Resolution [^] , Board Resolution copy#	190.00	Not Applicable	Not Applicable	No comments received	No comments received	No comments received
2	Investment in Subsidiary	Management Certificate, Chartered Accountant Certificate*, Shareholder Resolution [^] , Board Resolution copy#	30.00	Not Applicable		No comments received	No comments received	No comments received
3	General corporate purposes	Management Certificate, Chartered Accountant Certificate*, Shareholder Resolution [^] , Board Resolution copy#	24.80	Not Applicable		No comments received	No comments received	No comments received
Total			244.80	-				

*Chartered Accountant Certificate from CNK & Associates LLP (Statutory Auditor) dated November 04, 2025.

[^] Shareholder Resolution implies the special resolution passed in reference to the EGM Notice dated August 29, 2024, of the Company.

#Board Resolution copy implies the resolution passed by the Board of directors of the Company in their Meeting dated October 07, 2024, and November 09, 2024.

CARE Ratings Limited

9th Floor, C-001/A2, Berger Towers, Sector-16B,
Noida, Gautam Budh Nagar, Uttar Pradesh - 201 301
Phone: +91-120-445 2000

4th Floor, Godrej Coliseum, Somaiya Hospital
Road, Off Eastern Express Highway, Sion (East),
Mumbai - 400 022
Phone: +91-22-6754 3456
Email: care@careedge.in • www.careedge.in

CIN-L67190MH1993PLC071691

(ii) Progress in the objects –

Sr. No	Item Head	Source of information / certifications considered by Monitoring Agency for preparation of report	Amount as proposed in the Offer Document in Rs. Crore	Amount raised till date i.e. Sep 30, 2025	Amount utilised in Rs. Crore			Total unutilised amount in Rs. crore	Comments of the Monitoring Agency	Comments of the Board of Directors	
					As at beginning of the quarter in Rs. Crore	During the quarter in Rs. Crore	At the end of the quarter in Rs. Crore			Reasons for idle funds	Proposed course of action
1	Investment in Plant & Machinery (Jagriti Project)	Bank statements, CA Certificate*, Management Certificate	190.00	171.36	126.80	2.75	129.55	0.01	During Q2FY26, the investment in plant & machinery of Rs.2.75 crore has been made towards the procurement of machinery and spare parts/ accessories. The payment has been made to various vendors directly from the monitoring account.	No comments received	No comments received
2	Investment in Subsidiary	Bank statements, CA Certificate*, Management Certificate	30.00		17.00	-	17.00		Nil funds utilized by the company towards investment in subsidiary in Q2FY26.	No comments received	No comments received
3	General corporate purposes	Bank statements, CA Certificate*, Management Certificate	24.80		24.80	-	24.80		Nil funds utilized by the company towards investment in subsidiary in Q2FY26.	No comments received	No comments received
Total			244.80^	171.36	168.60	2.75	171.35	0.01			

*Chartered Accountant Certificate from CNK & Associates LLP (Statutory Auditor) dated November 04, 2025.

CARE Ratings Limited

9th Floor, C-001/A2, Berger Towers, Sector-16B,
Noida, Gautam Budh Nagar, Uttar Pradesh - 201 301
Phone: +91-120-445 2000

4th Floor, Godrej Coliseum, Somaiya Hospital
Road, Off Eastern Express Highway, Sion (East),
Mumbai - 400 022
Phone: +91-22-6754 3456
Email: care@careedge.in • www.careedge.in

^ Company had come out with preferential issue of 54 lakh equity shares aggregating to Rs. 146.88 crore @ Rs. 272/- per share including securities premium of Rs.262 per share to the non-promoters. Company had also come out with preferential share warrants issue of up to 36 lakh fully convertible warrants (convertible into equal number of equity shares) aggregating to Rs. 97.92 crore, at an issue price of Rs. 272 per warrant ((including share premium of Rs. 262 per warrant) to the persons/entities belonging to non-promoter category ("Allotees"). Total amount to be raised is Rs. 244.80 crore.

Till September 30, 2025, the preferential issue of equity share and convertible warrants have been fully subscribed from the proposed allottees (i.e. non-promoter category). However, only 25% of the share warrants issue price received as upfront payment aggregating to Rs. 24.48 crore (i.e. at the rate of Rs. 68 per warrant) and balance 75% of the warrants exercise price to be received within 12 months from the date of allotment i.e. October 13, 2025. Further, pursuant to the special resolution passed on September 30, 2025, members of the company have approved an extension in timeline for exercising remaining part of the share warrants from existing period of 12 months to 18 months from the allotment date.

Note: In Q1FY26, the company earned interest of Rs.2.02 crore on FDRs created from funds raised through preferential allotment. These funds were subsequently utilized in Q2FY26. However, this utilisation is not monitored by the monitoring agency.

(iii) Deployment of unutilized proceeds:

Sr. No.	Type of instrument and name of the entity invested in	Amount invested	Maturity date	Earning	Return on Investment (%)	Market Value as at the end of quarter
1	Closing balance of Monitoring Account at Axis Bank	0.002	-	-	-	-
2	Closing balance of Monitoring Account at HDFC Bank	0.01	-	-	-	-
	Total unutilized proceeds	0.01	-	-	-	-

(iv) Delay in implementation of the object(s) –

Objects	Completion Date		Delay (no. of days/ months)	Comments of the Board of Directors	
	As per the offer document	Actual		Reason of delay	Proposed course of action
Investment in Plant & Machinery (Jagriti Project)	Within 12 months from receipt of funds for the warrants	Ongoing	Not applicable	No comments received	No comments received
Investment in Subsidiary		Ongoing	Not applicable	No comments received	No comments received
General corporate purposes		January 03, 2025	No delay	No comments received	No comments received

Note: A resolution passed in the 45th Annual General Meeting of the company dated September 30, 2025, where members of the company have approved the extension in timeline for exercise share warrants from existing period of 12 months to 18 months from the allotment date.

CARE Ratings Limited

9th Floor, C-001/A2, Berger Towers, Sector-16B,
Noida, Gautam Budh Nagar, Uttar Pradesh - 201 301
Phone: +91-120-445 2000

4th Floor, Godrej Coliseum, Somaiya Hospital
Road, Off Eastern Express Highway, Sion (East),
Mumbai - 400 022
Phone: +91-22-6754 3456
Email: care@careedge.in • www.careedge.in

5) Details of utilization of proceeds stated as General Corporate Purpose (GCP) amount in the offer document:

Sr. No	Item Head^	Amount in Rs. Crore	Source of information / certifications considered by Monitoring Agency for preparation of report	Comments of Monitoring Agency	Comments of the Board of Directors
1	General Corporate Purpose	0.00	Bank Statement, CA Certificate*, Management Certificate	Nil funds utilized by the company towards general corporate purposes in Q2FY26.	No comments received
	Total	0.00			

*Chartered Accountant Certificate from CNK & Associates LLP (Statutory Auditor) dated November 04, 2025.

^Section from the offer document related to GCP:

"Rs. 24.80 crore to be utilized for general corporate purposes, which include, but is not limited to, repayment of Cash Credit facility or Long-Term debt or such other permitted modes as per applicable laws and other instruments as may be approved by the Managing Director of the company from time to time."

CARE Ratings Limited

9th Floor, C-001/A2, Berger Towers, Sector-16B,
Noida, Gautam Budh Nagar, Uttar Pradesh - 201 301
Phone: +91-120-445 2000

4th Floor, Godrej Coliseum, Somaiya Hospital
Road, Off Eastern Express Highway, Sion (East),
Mumbai - 400 022
Phone: +91-22-6754 3456
Email: care@careedge.in • www.careedge.in

CIN-L67190MH1993PLC071691

Disclaimers to MA report:

- a) This Report is prepared by CARE Ratings Ltd (hereinafter referred to as “**Monitoring Agency/MA**”). The MA has taken utmost care to ensure accuracy and objectivity while developing this Report based on the information provided by the Issuer and information obtained from sources believed by it to be accurate and reliable. The views and opinions expressed herein do not constitute the opinion of MA to deal in any security of the Issuer in any manner whatsoever.
- b) This Report has to be seen in its entirety; the selective review of portions of the Report may lead to inaccurate assessments. For the purpose of this Report, MA has relied upon the information provided by the management /officials/ consultants of the Issuer and third-party sources like statutory auditor/peer reviewed audit firm appointed by the Issuer believed by it to be accurate and reliable.
- c) Nothing contained in this Report is capable or intended to create any legally binding obligations on the MA which accepts no responsibility, whatsoever, for loss or damage from the use of the said information. The MA is also not responsible for any errors in transmission and specifically states that it, or its directors, employees do not have any financial liabilities whatsoever to the users of this Report.
- d) The MA and its affiliates do not act as a fiduciary. The MA and its affiliates also do not act as an expert to the extent defined under Section 2(38) of the Companies Act, 2013. While the MA has obtained information from sources it believes to be reliable, it does not perform an audit and undertakes no independent verification of any information/ certifications/ statements it receives from statutory auditors/peer reviewed audit firm (or from peer reviewed CA firms), lawyers, chartered engineers or other experts, and relies on in its reports.
- e) The MA or its affiliates may have other commercial transactions with the entity to which the report pertains. As an example, the MA may rate the issuer or any debt instruments / facilities issued or proposed to be issued by the issuer that is subject matter of this report. The MA may receive separate compensation for its ratings and certain credit-related analyses, normally from issuers or underwriters of the instruments, facilities, securities or from obligors.

CARE Ratings Limited

9th Floor, C-001/A2, Berger Towers, Sector-16B,
Noida, Gautam Budh Nagar, Uttar Pradesh - 201 301
Phone: +91-120-445 2000

4th Floor, Godrej Coliseum, Somaiya Hospital
Road, Off Eastern Express Highway, Sion
(East), Mumbai - 400 022
Phone: +91-22-6754 3456
Email: care@careedge.in • www.careedge.in

CIN-L67190MH1993PLC071691