

**SATISH KUMAR SUBUDHI**

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**CERTIFICATE FROM KMP**

Date: 01<sup>st</sup> December 2025

To,  
The Board of Directors,  
NACL Industries Limited  
Plot no.12-A, 'C' Block, Lakshmi towers,  
No.8-2-248/1/7/78,  
Nagarjuna Hills, Panjagutta,  
Hyderabad, Telangana,  
India, 500082.

**Sub: Proposed Rights Issue of equity shares of face value ₹ 1 ("Equity Shares") by NACL Industries Limited (the "Company" and such offer, the "Offer")**

Dear Sir/Ma'am,

I, **Satish Kumar Subudhi** am Key Managerial Personnel ("KMP") of the Company as defined under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (the "**ICDR Regulations**") and under Companies Act, 2013, as applicable, and confirm that the following information with respect to me is true, fair, correct and not misleading and without omission of any matter that is likely to mislead. I consent to be named as a KMP and to the inclusion of the information contained in this certificate in the Draft Letter of Offer ("**DLOF**") and Letter of Offer ("**LOF**") (collectively, the "**Offer Documents**") which the Company intends to file with National Stock Exchange of India Limited ("**NSE**") and BSE Limited ("**BSE**"), where the Equity Shares are proposed to be listed ("**Stock Exchanges**"), and in any other Offer related documents.

***Interest of KMP***

Except as disclosed below, neither I nor any of my relatives (as defined under the Companies Act, 2013), hold any Equity Shares, warrants, employee stock options or any other convertible instrument in the Company, as of the date of this certificate.

Equity Shares: 26999; Outstanding ESOPs: 0

I hereby declare and confirm that no show-cause notice(s) has been issued by SEBI or the Adjudicating Officer in a proceeding for imposition of penalty, further, there are no prosecution proceedings that have been initiated against me by SEBI.

I have not been debarred or prohibited from accessing the capital markets or debarred from buying, selling or dealing in securities under any order or direction by the SEBI or any other securities market regulator in any other jurisdiction or any authority/court.

I have not been identified as a wilful defaulter by any bank or financial institution or consortium thereof, in accordance with the guidelines on wilful defaulters issued by the Reserve Bank of India as defined under the SEBI ICDR Regulations and I am not declared as 'fraudulent borrowers' by lending banks, financial institutions or consortium, in terms of the RBI Master Direction on Frauds dated July 1, 2016, as amended.

I confirm that I will immediately inform you of any changes to the above information until the date when the Equity Shares of the Company, issued pursuant to the Offer, commence trading on the Stock Exchanges.

All Capitalised terms used herein but not defined shall have the same meaning as ascribed to them in the Offer Documents.

Yours faithfully,

**Satish Kumar Subudhi**

Key Managerial Personnel (KMP)