

By Registered Post AD / Courier /
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September 3, 2025

To,
Department of Corporate Service
BSE Limited,

Registered Office : Floor 25, P. J. Towers,
Dalal Street, Fort, Mumbai 400001. MAHARASHTRA.
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Company : CENTENIAL SURGICAL SUTURE LTD.
Scrip no. : 531380 – traded on BSE Ltd.

Reference : L/SURV/ONL/PV/AJ/ 2025-2026 / 3065 dated September 2, 2025

Subject : Clarification on Price Movement

We observed that there have been unusual trades in the company shares and have sent various letters in the past as noticed on BSE Limited, Mumbai, Maharashtra, our company, CENTENIAL SURGICAL SUTURE LTD., Scrip no.: 531380,

We can send you Names, Addresses, E-mail ID's, Telephone numbers / Cell – Mobile Numbers and including modes of acquisition of shares, sale of shares and unusual rise and fall in the price and details of transactions that is the name of the person/s | broking firms | clearing houses buying 1 share and selling 1 share to raise the price or lower the price and our submission provides enough support to conclude that this is price rigging and this is not being based on mere suspicion or presumption.

Truth or genuineness of such transactions must prevail over smoke screen created by way of three meditated series of steps taken by the person/s | broking firms | clearing houses with a view to imparting a colour of genuineness and character of commercial nature to such share transactions. If one look at the whole transaction of the series of steps taken to accomplish such share transactions in an integrated manner with a view to ascertain the true nature and character of such purchase and sales of shares, it is abundantly clear that the person/s | broking firms | clearing houses will fail to prove these transactions between the parties as true.

We request your department to examine if these transactions are legally valid, that the genuineness of the arrangement has to be viewed not in relation to every step taken to achieve the result but in relation to the final result, that one has to look at the truth of the transaction (and if permissible) by going behind the facade of the number of shares / documentation or the series of steps taken, that SEBI always have the freedom to 'go behind the documents to find out the real intention of the parties, that the rule presupposes that in a given case the real intention of the parties to a document / transaction / arrangement could be different from what it appears from it ex facie, that SEBI must normally proceed on the basis of the professed intention, but if that is under doubt or is disputed or is challenged, then its power to find out the real intention of the parties by ignoring the apparent has to be and has always been conceded, that in cases of make believe arrangement or a subterfuge or a dubious or a colourable transaction's adopted, SEBI will be merely removing the facade to expose the real intention of the parties cleverly cloaked and if that intention is discovered to be the evasion of SEBI / BSE Ltd., attention, it cannot be given effect to merely because all the steps taken as component parts of the arrangements are legally correct or valid, that the right of the parties to enter into transactions according to their free will and choice has always been protected, the only rider being that both the professed intention and the real intention



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should be the same, that all commercial arrangements and documents or transactions have to be given effect to even though they result in price escalation, provided that they are genuine, bonafide and not colourable transaction.

The trading volume of shares during the period, in which manipulations are done to raise or drop the market price, is extremely thin and do not have the credentials to justify the sharp rise or fall in Market Price of our company's shares.

Most of the purported buyers are buying 1 to 5 shares in our company. Thus, an enquiry would reveal that most of the buyers through brokers are spread all over INDIA and some are repeated buyers and this is probably done to avoid the eyes of SEBI | BSE surveillance.

The sharp rise in market price of our company's shares is not supported by any fundamentals of the company or any other genuine factors.

An analysis in respect of persons / buyers involved in purchase and sell transactions apparently carried out in order to jack up the share prices has been done in respect of our company. It has been noted that many common persons/entities were involved in trading in during the period in question when the shares were made to rise which implies that they had contributed to such price rise and this is clearly been schemed and pre-planned with malafide intention, and these transactions are unnatural and highly suspicious.

Further, it appears the main person / entity does not allow any person / entity / buyers to buy/sell to any person outside the syndicate. This is generally ensured by way of synchronized trading by the buyers / operators amongst themselves and/or by utilizing the mechanism of upper/lower circuit of the BSE Ltd., Exchange.

The issue for consideration before us is whether, in such cases, the legal documentary trading evidence produced by our company has to guide our decision in the matter or the general observations based on trading / number of shares bought and sold / circular trading all over INDIA / repeated investors / synchronized trading by the investors / operators amongst themselves, probabilities, human behaviour and discovery of the modus operandi adopted in rigging the price that will surface during investigations, should guide the authorities SEBI and BSE Limited in arriving at a conclusion as to whether our claim is genuine.

In view of all the facts as observed hereinabove and the investigation of buyers and sellers done by our share department on a large scale to unearth the true nature of the transactions which has clearly proved the manipulative practice of these persons / entities.

We can submit details of all the buying and selling of shares from January 1, 2025 till August 31, 2025.

The total number of shares purchased and sold and price rise and fall, there appears to be misuse of stock market trades for share price increase/decrease, manipulation and violation of securities laws of our country.

Our company's share price shot up and declined and this price manipulation by increasing/decreasing the last trading share price every time the company's share scrip was traded on the BSE Limited.

Further, our company has not made any announcement which is of material nature to encourage this significant increase/decrease in the share price and we are seeking a probe on the unusual trading pattern. We feel that there are some persons / parties / company's trying to manipulate the price of our company's shares with vested interest. Hence, we request you to intervene in the matter and conduct a complete investigation in this scrip.

We as the company / promoters are ready for any kind of assistance that is required in a detailed investigation for probable violation of securities laws. We hope that you will look into this matter on a priority basis.



Our company has taken a decision to approach you, to protect the interest of the shareholders and to curb any misuse, unethical or illegal activities which may have an adverse effect on the reputation of our company.

Further, in relation to the reference above, we would like to clarify that, we are not aware of any information/announcement including pending announcement which in the Company's opinion may have a bearing on the share price of the Company. There are no regulatory/legal proceedings initiated/ongoing in this regard. In absence of any other information in this regard, we are unable to comment on the materiality of the said reference above. We thank you for drawing our attention and assure you of Company's continued adherence to its obligation under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

We once again wish to place on record that the Company, its Promoters, Directors or associates have no role in this misuse, unethical or illegal activities.

We urge and request your good offices to investigate the price movement and operations in the CENTENIAL SURGICAL SUTURE LTD., equity shares in the recent past and initiate appropriate penal actions against concerned broking house(s) and/or their clients to ensure that the conspirators are brought to book immediately, rather be treated as an emergency.

Yours sincerely,

for **CENTENIAL SURGICAL SUTURE LTD.**



**MAHIMA
BATHWAL**

Digitally signed
by MAHIMA
BATHWAL
Date: 2025.09.04
20:36:26 +05'30'

Mahima BATHWAL
Company Secretary & Compliance Officer