



SPINAROO COMMERCIAL LIMITED

(Formerly known as Spinaroo Commercial Private Limited)

CIN: L74999WB2012PLC184812

GSTIN: 19AARCS9032N1ZF

Date: 11th November, 2025

The Manager
BSE Limited
Phiroze Jeejeebhoy Towers, Dalal Street
Mumbai-400 001
(BSE Scrip Code- 544392)

Subject: Statement of Deviation or Variation in utilization of funds raised under Regulation 32 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 for Half Year ended September 30, 2025

Dear Sir/Madam,

Pursuant to Regulation 32 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, ('Listing Regulations') read with SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024, we hereby confirm that there was no deviation or variation in the use of proceeds of funds raised through Initial Public Offer (IPO) of equity share.

A Statement of deviation or variation for half year ended 30th September, 2025, was reviewed by the Audit Committee of the Company at its meeting held on 11th November, 2025 as required under Regulation 32(3) of the Listing Regulations. The same is enclosed herewith in the prescribed format.

This is for your kind records and information.

Thanking you,

Yours faithfully,

For Spinaroo Commercial Limited

Megha Khanna
Company Secretary

Encl: As above



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Statement of Deviation/ Variation in utilization of funds raised

Name of the Listed entity	Spinaroo Commercial Limited
Mode of Fund Raising	Initial Public Offer (IPO)
Date of Raising Funds	03-04-2025
Amount Raised	101694000
Report filed for Quarter ended	30-09-2025
Monitoring Agency	Not Applicable
Monitoring Agency Name, if applicable	-
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 shareholders	No Applicable
If Yes, Date of shareholder Approval	Not Applicable
Explanation for the Deviation / Variation	Not Applicable
Comments of the Audit Committee after review	The Company is in Compliance with the requirement specified in the regulations for raising funds so after review, there is favourable remark from the Audit Committee.
Comments of the auditors, if any	No comments

Objects for which funds have been raised and where there has been a deviation, in the following table:

Sl. No.	Original Object	Modified Object, if any	Original Allocation	Modified Allocation, if any	Fund utilized	Amount of Deviation/Variation for the quarter according to applicable object	Remarks, if any
1	Working Capital Requirement	NA	71284000	NA	71284000	No Deviation / Variation	NA
2	General Corporate Expenses	NA	20000000	NA	20000000	No Deviation / Variation	NA

Deviation or variation could mean:

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