SURANI STEEL TUBES LTD.
CIN : L27109GJ2012PLC071373
SURANI
S.No.110,115, Opp. Vinayak TMT, Bayad Road, Village: Sampa, Ta: Dahegam, Dist: Gandhinagar-382 315 (GUJARAT) INDIA.

Date: 10.05.2023

To
The Manager,
Listing Department,
National Stock Exchange of India Ltd.,
'Exchange Plaza', C-1 Block G,
Bandra Kurla Complex, Bandra (East)
Mumbai-400051

Sub: Disclosure under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 - Postal Ballot Notice

Pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, please find attached the Postal Ballot Notice for seeking approval of the members of the Company by way of remote e-voting for business as mentioned in the notice.

Postal ballot Notice is being sent only through electronic mode to the members whose names appear in the Register of Members / List of Beneficial Owners as received from National Securities Depository Limited and Central Depository Services (India) Limited and whose email ID is registered with the Depositories as on Friday, May 05, 2023 ("Cut-off date").

The Company has engaged the services of NSDL for providing remote e-voting facility to all its member. The e-voting facility will be available during the following period.

Commencement of e-voting	Thursday,11th May,2023
End of e-voting	Friday, 9th June,2023
Date of Result	On or before Sunday, 11th June,2023

Postal Ballot notice is also available on website of the Company at www.suranisteel.com.

Request you to please take the same on your record.
Thanking you.
Yours Faithfully,
For SURANI STEEL TUBES LIMITED,

MOHINDER SINGH Digitally signed by MOHINDER SINGH
Date: 2023.05.10 16:39:47 +05'30'

Mohinder Singh
Company Secretary and compliance officer (ACS: 21857)

SURANI STEEL TUBES LIMITED
CIN: L27109GJ2012PLC071373
Regd. Office: S. No.110,115, Opp. Vinayak TMT, Bayad Road, Tal. Dahegam,
Sampa Gandhinagar, Gujrat – 382315, India
Tel: 091-9825515372
Website: www.suranisteel.com**, Email:** info@suranisteel.com

NOTICE OF POSTAL BALLOT THROUGH E-VOTING

Pursuant to Section 108 and 110 of the Companies Act, 2013 read with Rule 20 and 22 of The Companies (Management & Administration) Rules, 2014

To,
Dear Member(s),

NOTICE is hereby given pursuant to and in compliance with the provisions of Section 108 and Section 110 and other applicable provisions, if any, of the Companies Act, 2013 **("Act")** read with Rule 20 and 22 of the Companies (Management and Administration) Rules 2014 **("the Rules"**), (including any amendment(s), statutory modifications or re-enactments thereof for the time being in force), Regulation 44 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 **("SEBI Listing Regulations")**, Secretarial Standards issued by the Institute of Company Secretaries of India on General Meetings **("SS-2")** and relaxations and circulars issued by the Ministry of Corporate Affairs **("MCA")** vide its General Circulars No. 14/2020 dated April 08, 2020, No. 17/2020 dated April 13, 2020, No. 22/2020 dated June 15, 2020, No. 33/2020 dated September 28, 2020, No. 39/2020 dated December 31, 2020, No. 10/2021 dated June 23, 2021, No. 20/2021 dated December 8, 2021, No. 3/2022 dated May 05, 2022 and No. 11/2022 dated December 28, 2022 (collectively referred to as **"MCA Circulars"**), any circular issued by the Securities and Exchange Board of India **("SEBI")** and other applicable laws and regulations, if any, for seeking approval of shareholders of Surani Steel Tubes Limited **(the "Company"),** the resolution(s) appended below through postal ballot by remote e-voting process **("E-voting")**.

As permitted under the MCA Circulars and SEBI Circulars, the Company is sending the Notice in electronic form only. In compliance with Sections 108 and 110 of the Act read with the rules framed there under and the MCA Circulars, the Company has extended only the remote e-voting facility for its members, to enable them to cast their votes electronically instead of submitting the postal ballot form. The instructions for remote e-voting are appended to the Notice.

The Explanatory Statement pursuant to Section 102 of the Act setting out the material facts and related particulars pertaining to the aforesaid Special Businesses is annexed to this Postal Ballot Notice for your consideration.

The remote e-voting period commences from 9.00 a.m. (IST) on Thursday, May 11, 2023, and ends at 5.00 p.m. (IST) on Friday, June 09, 2023. Once a member casts the vote on the Resolution, he or she will not be allowed to change it subsequently. Assent or Dissent of the members on the resolutions mentioned in the Notice would only be taken through the remote e-voting system as per the MCA Circulars.

Members are requested to carefully read the instructions indicated in this Notice and communicate their assent (for) or dissent (against) through remote e-voting only.

The Board of Directors of the Company has appointed Mr. Sahil Malhotra Prop. S V Associates, Practicing Company Secretary, Chandigarh having Membership Number 14791, to act as the Scrutinizer for conducting the Postal Ballot (remote e-voting) process in a fair and transparent manner and in accordance with the provisions of the Act and the rules made thereunder.

In compliance with the provisions of Sections 108 and 110 of the Act, read with Rules 20 and 22 of the Rules, Regulation 44 of the SEBI LODR, 2015 and MCA Circulars, the Company is offering facility of evoting (remote e-voting) through National Securities Depository Limited ('NSDL') to all Members to enable them to cast their votes electronically as on Friday, May 5, 2023 (cut-off date). Members are requested to follow the procedure as stated in the Notes in this regard

Upon completion of the e-voting process, the Scrutinizer will submit his report to the Chairman of the Company and the result of the Postal Ballot will be announced within 2 (Two) working days from the last day of E-voting i.e. on or before Tuesday, June 11, 2023 and the same shall also be simultaneously communicated to the Stock Exchange where the equity shares of the Company are listed.

The said result along with the Scrutinizer's Report will be uploaded on the Company's website www.suranisteel.com and on the website of RTAs and will be communicated to the stock exchange where the equity shares of the Company are listed.

SPECIAL BUSINESSES

ITEM NO. 1: INCREASE IN AUTHORISED SHARE CAPITAL AND CONSEQUENT ALTERATION OF THE CAPITAL CLAUSE IN THE MEMORANDUM OF ASSOCIATION OF THE COMPANY

To consider and, if thought fit, to pass the following resolution as an **Ordinary Resolution:**

"RESOLVED THAT pursuant to the provisions of Section 13, 61 and all other applicable provisions of the Companies Act, 2013 and rules issued thereunder (including any statutory modification(s) or

reenactment thereof for the time being in force), and subject to such other approval(s)/consent(s) from the concerned Statutory/Regulatory Authority(ies), the consent of the members be and is hereby accorded to increase the Authorized Share Capital of the Company from Rs. 9,00,00,000 /- (Rupees Nine Crore Only) divided into 90,00,000 (Ninety Lakhs) Equity Shares of Rs. 10/- each to Rs. 20,00,00,000/- (Rupees (Twenty Crores Only) divided into 2,00,00,000 (Two Crores) Equity Shares of Rs. 10/- each.

RESOLVED FURTHER THAT the Memorandum of Association of the Company be altered and the existing Clause V of the Memorandum of Association be deleted and the same be substituted with the following new clause as Clause V:

"V. The Authorized Share Capital of the Company is Rs. 20,00,00,000/- (Rupees Twenty Crores Only) divided into 2,00,00,000 *(Two Crores)* ***Equity Shares of Rs. 10/- each."***

RESOLVED FURTHER THAT for the purpose of giving effect to this resolution, the Board of Directors of the Company and the Company Secretary & Compliance Officer of the Company, be and are hereby severally authorized to take such steps and to do and perform all such acts, deeds, matters and things and make, sign and file such applications/ forms with Registrar of Companies and/ or any other statutory authorities as may be required and accept any alteration(s) or modification(s) as may be necessary for the purpose of giving effect to the aforesaid resolutions and for matters connected therewith or incidental thereto or to settle any question or difficulty that may arise in this regard, in such manner as they may deem fit."

ITEM NO. 2: ISSUANCE OF UPTO 80,52,000 FULLY CONVERTIBLE WARRANTS TO THE PERSONS BELONGING TO 'NON-PROMOTER CATEGORY' ON PREFERENTIAL BASIS.

To consider and, if thought fit, to pass the following resolution as a **Special Resolution:**

"RESOLVED THAT pursuant to the provisions of Sections 42, 62(1)(c) and other applicable provisions, if any, of the Companies Act, 2013 (hereinafter referred to as the "**Companies Act**") read with the Companies (Prospectus and Allotment of Securities) Rules, 2014, as amended and the Companies (Share Capital and Debentures) Rules, 2014, as amended and other relevant rules made there under [including any statutory modification(s) thereto or re-enactment thereof for the time being in force], enabling provisions in Memorandum and Articles of Association of the Company, provisions of the uniform listing agreement entered into with NSE where the equity shares of the Company are listed ("**Stock Exchange**"), and in accordance with the guidelines, rules and regulations of the Securities and Exchange Board of India ("**SEBI**"), as amended including the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("**SEBI ICDR Regulations**"), the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**"SEBI Listing Regulations"**), as amended, SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 **("Takeover Regulations")** as amended, the Foreign Exchange Management Act, 1999 as amended and in accordance with other applicable rules, regulations, circulars, notifications, clarifications and guidelines issued thereon, from time to time, by Ministry of Corporate Affairs, SEBI and / or any other competent authorities, and subject to the approvals, consents, permissions and / or sanctions, as may be required from the Government of India,

SEBI, Stock Exchange, and any other relevant statutory, regulatory, governmental authorities or departments, institutions or bodies and subject to such terms, conditions, alterations, corrections, changes, variations and / or modifications, if any, as may be prescribed by any one or more or all of them in granting such approvals, consents, permissions and / or sanctions and which may be agreed to by the Board of Directors of the Company (hereinafter referred to as the **"Board"** which term shall be deemed to include any Committee, which the Board has constituted or may hereafter constitute, to exercise one or more of its powers, including the powers conferred hereunder), consent of the members of the Company be and is hereby accorded to the Board to create, issue, offer and allot, on a preferential basis, upto **80,52,000 (Eighty Lakhs Fifty Two Thousand Only) Fully Convertible Warrants ("Warrants")** carrying a right exercisable by the Warrant holder to subscribe to one Equity Share per Warrant, to persons belonging to ' 'Non-Promoter' Category, on preferential basis, at an issue price of **Rs. 135/- (Rupees One Hundred Thirty Five Only) per warrant** in accordance with provisions of Chapter V of SEBI ICDR Regulations, for an aggregate amount of up to **Rs. 1,08,70,20,000/- (Rupees One Hundred Eight Crores and Seventy Lakhs Twenty Thousand),** on such further terms and conditions as may be finalized, to the below mentioned persons **("Proposed Allottees"):**

SR.	NAME OF THE PROPOSED ALLOTTEEE	CATEGORY	PROPOSED WARRANT QUANTITY TO BE ALLOTTED
1	KIRAN BALA GUPTA	Non-Promoter	4,00,000
2	HIMANK GUPTA	Non-Promoter	3,50,000
3	LOVE BANSAL HUF	Non-Promoter	3,00,000
4	SANJEEV KUMAR	Non-Promoter	2,50,000
5	Priyanka Rustagi	Non-Promoter	2,22,000
6	Ponika Multitrade Private Limited	Non-Promoter	2,22,000
7	KARAN GUPTA	Non-Promoter	2,00,000
8	SAMEER MITTAL	Non-Promoter	2,00,000
9	MSL HOLDINGS PRIVATE LIMITED	Non-Promoter	2,00,000
10	K E I METALS PRIVATE LIMITED	Non-Promoter	2,00,000
11	KANAV CHOPRA	Non-Promoter	2,00,000
12	KUSH BANSAL HUF	Non-Promoter	2,00,000
13	PRAJAL BHANDARI	Non-Promoter	2,00,000
14	YATHARTH KANSAL	Non-Promoter	2,00,000
15	ANIL KUMAR HUF	Non-Promoter	2,00,000
16	Maithili Tradecom Private Limited	Non-Promoter	1,92,000
17	SUNIL BHANDARI	Non-Promoter	1,50,000
18	REKHA BHANDARI	Non-Promoter	1,50,000
19	GAURAV GUPTA	Non-Promoter	1,50,000
20	PUNYA GUPTA	Non-Promoter	1,50,000
21	Agro Trade Solutions	Non-Promoter	1,48,000
22	Iqbal Ashrafali Ahmed	Non-Promoter	1,48,000
23	Manisha Loonkar	Non-Promoter	1,48,000
24	Bindal Finvest Pvt Ltd	Non-Promoter	1,10,000
25	SANJAY MEHTANI	Non-Promoter	1,00,000

26	SHUBHAM SINGHAL	Non-Promoter	1,00,000
27	ADARSH GARG	Non-Promoter	1,00,000
28	AASHNA GUPTA	Non-Promoter	1,00,000
29	RUCHI GUPTA	Non-Promoter	1,00,000
30	NIMRAT BEDI	Non-Promoter	1,00,000
31	SOM LATA	Non-Promoter	1,00,000
32	AMBEY INDUSTRIES	Non-Promoter	90,000
33	VIVEK GARG	Non-Promoter	75,000
34	Ageless Capital and Finance Private Limited	Non-Promoter	74,000
35	Laxmi Trade Solutions	Non-Promoter	74,000
36	Mausam Shah	Non-Promoter	74,000
37	Nidhi Agarwal	Non-Promoter	74,000
38	Rohan Agarwal	Non-Promoter	74,000
39	Tahzeeb Mohamed Tariq	Non-Promoter	74,000
40	Trishakti Power Holdings Private Limited	Non-Promoter	74,000
41	R P S KHURANA	Non-Promoter	70,000
42	Radhika Chopra	Non-Promoter	56,000
43	MANINDER SINGH	Non-Promoter	50,000
44	SUREKHA RANI	Non-Promoter	50,000
45	HARISH GUPTA	Non-Promoter	50,000
46	VAIBHAV JINDAL	Non-Promoter	50,000
47	NUPUR JAIN	Non-Promoter	50,000
48	Jigna Tezas Shah	Non-Promoter	44,000
49	Manan Ankur Shah	Non-Promoter	44,000
50	GURMEET SINGH VIRDI	Non-Promoter	40,000
51	JATINDER SINGH NAGPAL	Non-Promoter	40,000
52	NEERAJ BANSAL	Non-Promoter	40,000
53	PIYUSH TANTIA	Non-Promoter	40,000
54	Harish Kumar Jaipuria	Non-Promoter	38,000
55	Santosh Jaipuria	Non-Promoter	38,000
56	SARTAJ MEHTA	Non-Promoter	30,000
57	RAVIKIRAN NAGPAL	Non-Promoter	30,000
58	NARENDER SINGH NAGPAL	Non-Promoter	30,000
59	SONU GUPTA	Non-Promoter	30,000
60	VIMAL KUMAR JINDAL	Non-Promoter	30,000
61	AMAN GUPTA	Non-Promoter	30,000
62	SURINDER KUMAR	Non-Promoter	30,000
63	GURSHARAN SINGH	Non-Promoter	26,000
64	AVNEET CHAWLA	Non-Promoter	25,000
65	CHARANJIT SINGH	Non-Promoter	25,000
66	UMR FRUITS PRIVATE LIMITED	Non-Promoter	25,000
67	ABHINAV GUPTA	Non-Promoter	25,000
68	ARJUN GANDOTRA	Non-Promoter	25,000
69	PRABHDEEP SINGH GHAI	Non-Promoter	25,000
70	MANISHA JAIN	Non-Promoter	25,000

71	NITIN JAIN HUF	Non-Promoter	25,000
72	ANU GUPTA	Non-Promoter	25,000
73	AARSH GUPTA	Non-Promoter	25,000
74	MEENA KANSAL	Non-Promoter	25,000
75	SANYA KANSAL	Non-Promoter	25,000
76	NARAIN DASS SINGLA & SONS HUF	Non-Promoter	25,000
77	KANGAN KANSAL	Non-Promoter	25,000
78	VINAY ANAND	Non-Promoter	25,000
79	GAUTAM SHROFF	Non-Promoter	25,000
80	NEELU SINHA	Non-Promoter	20,000
81	SUKHWANT SINGH	Non-Promoter	20,000
82	NIDHI	Non-Promoter	20,000
83	SHIVANI BAJAJ	Non-Promoter	20,000
84	TUSHAR KAPOOR	Non-Promoter	20,000
85	SK GUPTA AND SONS HUF	Non-Promoter	20,000
86	SWEENY GUPTA	Non-Promoter	20,000
87	HARSHIT JINDAL	Non-Promoter	20,000
88	ANIL SINGHAL	Non-Promoter	20,000
89	Labdhi Kaushal Shah	Non-Promoter	18,000
90	Ritika Ranjan	Non-Promoter	18,000
91	Alka Harkut	Non-Promoter	18,000
92	ROSHNI VINAYAK JAKSAN	Non-Promoter	15,000
93	Naman Shah	Non-Promoter	14,000
94	Vaishali Udeshi	Non-Promoter	14,000
95	LAKSHAY JINDAL	Non-Promoter	14,000
96	PREM KUMAR JAIN	Non-Promoter	12,000
97	BINDU CHAWLA	Non-Promoter	10,000
98	JATINDER SINGH CHAWLA	Non-Promoter	10,000
99	RAHUL GAUBA	Non-Promoter	10,000
100	NEETIKA GARG	Non-Promoter	10,000
101	RAJIV RAJA JAGGI	Non-Promoter	10,000
102	RAGHAV RAJA JAGGI	Non-Promoter	10,000
103	HARMANDEEP KAUR	Non-Promoter	10,000
104	PARMOD KUMAR	Non-Promoter	10,000
105	AGNEH RAJ SIKKA	Non-Promoter	10,000
106	RAJEEV SIKKA	Non-Promoter	10,000
107	JAI RAJ SIKKA	Non-Promoter	10,000
108	SHUBHAM BIYANI	Non-Promoter	10,000
109	ASHOK KUMAR	Non-Promoter	10,000
110	ADITYA AGGARWAL	Non-Promoter	10,000
	TOTAL		**80,52,000**

RESOLVED FURTHER THAT in terms of the provisions of Chapter V of SEBI ICDR Regulations, the 'Relevant Date' for purpose of determining the minimum issue price of Equity Shares proposed to be allotted to the above mentioned allottees shall be Wednesday, May 10, 2023, i.e., being the date, which is 30 days prior to the last date of e-voting (i.e., Friday, June 09, 2023).

RESOLVED FURTHER THAT the aforesaid issue of Warrants shall be subject to the following terms and conditions:

(a) The conversion of warrants into equity shares shall happen at any time within a period of Eighteen (18) months from the date of allotment of warrants in terms of SEBI ICDR Regulations (the **"Warrant Exercise Period"**).

(b) The Proposed Allottee(s) shall, on or before the date of allotment of Warrants, pay an amount equivalent to at least 50% of the Warrant Issue Price fixed per Warrant in terms of the SEBI ICDR Regulations which will be kept by the Company to be adjusted and appropriated against the Warrant Issue Price of the Equity Shares. The balance 50% of the Warrant Issue Price shall be payable by the Warrant Holder at the time of exercising the Warrants.

(c) Warrants being allotted to the Proposed Allottee(s) and the Equity Shares proposed to be allotted pursuant to the conversion of these Warrants shall be under lock- in for such period as may be prescribed under SEBI ICDR Regulations.

(d) Warrants so allotted under this resolution shall not be sold, transferred, hypothecated or encumbered in any manner during the period of lock-in provided under SEBI (ICDR) Regulations except to the extent and in the manner permitted there under.

(e) Warrants shall be issued and allotted by the Company only in dematerialized form.

(f) The consideration for allotment of Warrants and/or Equity Shares arising out of exercise of such Warrants shall be paid to the Company from the bank account of the Proposed Allottee(s)

(g) In the event the Warrant Holder(s) do not exercise Warrants within the Warrant Exercise Period, the Warrants shall lapse and the amount paid shall stand forfeited by the Company.

(h) The Warrants by itself until converted into Equity Shares, do not give to the Warrant Holder any voting rights in the Company in respect of such Warrants."

RESOLVED FURTHER THAT the Equity Shares proposed to be so allotted upon conversion of Warrants shall rank *pari-passu* in all respects including as to dividend, with the existing fully paid-up Equity Shares of face value of ₹10/- (Rupees Ten Only) each of the Company, subject to the relevant provisions contained in the Memorandum of Association and Articles of Association of the Company.

RESOLVED FURTHER THAT for the purpose of giving effect to this resolution the Board of Directors of the Company and/or Committee of the Board of Directors and/or Company Secretary & Compliance Officer of the Company be and are hereby authorized severally on behalf of the Company to take all actions and to do all such acts, deeds, matters and things as it may in its absolute discretion consider necessary, desirable or expedient, including without limitation to make application to Stock Exchange for obtaining of in-principle approval, listing of shares, filing of requisite documents with the Registrar of Companies, National Securities Depository Limited (NSDL), Central Depository Services (India) Limited (CDSL) and/ or such other authorities as may be necessary for the purpose, to resolve and settle any questions and difficulties that may arise in the proposed issue, offer and allotment of the said equity

shares, utilization of issue proceeds, signing of all deeds and documents as may be required without being required to seek any further consent or approval of the shareholders.

By order of the Board of Directors
For **Surani Steel Tubes Limited**

Sd/-
Mohinder Singh
Company Secretary & Compliance Officer
M. No. : 21857

Place: Chandigarh
Date: 10th May, 2023

NOTES:

1. Explanatory Statement pursuant to Section 102 and 110 of the Act, and any other applicable provisions of the Act, the Rules made thereunder, Listing Regulations and Secretarial Standards on General Meetings (SS-2), setting out material facts and reasons thereof for the proposed resolutions, forming part of the Notice, is annexed herewith.

2. In accordance with MCA Circulars, this Postal Ballot Notice is being sent only by electronic mode to all the Members whose names appear on the Register of Members / List of Beneficial Owners as received from National Securities Depository Limited ("NSDL") and Central Depository Services (India) Limited ("CDSL") as on 05.05.2023 (the "Cut-off date") and who have registered their email addresses in respect of electronic holdings with the Depository through the concerned Depository Participants and in respect of physical holdings with the Company's Registrar and Share Transfer Agent, Link Intime India Private Limited ("RTA"). Physical copies of the Postal Ballot Notice, postal ballot forms and pre-paid business reply envelopes are not being sent to Members for this Postal Ballot.

3. Members may note that the aforesaid Postal Ballot Notice has been uploaded on the website of the Company at www.suranisteel.com. The Notice can also be accessed from the websites of the Stock Exchange i.e. National Stock Exchange of India Limited at www.nseindia.com and on the website of National Securities Depository Limited ('NSDL') at https://www.evoting.nsdl.com/.

4. Pursuant to Sections 108, 110 and other applicable provisions of the Act and the Rules made thereunder, the MCA Circulars and Regulation 44 of the Listing Regulations read with SEBI circular on e-voting, dated December 9, 2020; SS-2 and any amendments thereto, the Company is providing the facility to the Members to exercise their right to vote on the proposed resolution electronically. The Company has engaged the services of National Securities Depository Limited (NSDL), the agency to provide e-voting facility. Members are requested to carefully read the instructions for e-voting that are provided as part of this Postal Ballot Notice before casting their vote.

5. The voting rights of the Members shall be reckoned in proportion to the equity shares held by them on the Cut-off date i.e., 05.05.2023. Only those Members holding shares either in physical form or dematerialized form as on the Cut-off date will be entitled to cast their votes

only through remote e-voting. A person who is not a Member as on the Cut-off date should treat this notice for information purpose only.

6. The e-voting period commences on Thursday, the 11th day of May, 2023 (9.00 AM IST) and ends on Friday, 09th June, 2023 (5:00 PM IST). During this period, Members of the Company holding equity shares either in physical form or in dematerialized form, as on the cut-off date i.e., 05.05.2023 may cast their vote electronically. The e-voting module shall be disabled by NSDL for voting after 09th June, 2023 (5:00 PM IST). Once the vote on a resolution is cast by a Member, he or she will not be allowed to change it subsequently.

7. Physical copies of the Postal Ballot Notice along with Postal Ballot forms and pre-paid business reply envelopes are not being sent to Members for this Postal Ballot in line with the exemption provided in the MCA circulars.

8. The voting rights of Members shall be in proportion to their shares in the paid-up equity share capital of the Company as on the cut-off date i.e. Friday, May 5, 2023.

9. The resolution, if passed by the requisite majority, shall be deemed to have been passed on the last date of e-voting i.e., 09th June, 2023.

10. The Scrutinizer will submit his report to the Chairman of the Company, or any person authorised by him, after completion of the scrutiny of the votes cast electronically. The result of the Postal Ballot through remote e-voting process shall be announced on or before 11th June, 2023 and the resolution will be taken as passed, if the results of e-voting indicate that the requisite majority of the Members had assented to the Resolution.

11. The voting results along with Scrutinizer's report would be published on the website of the Company i.e.,www.suranisteel.com and will be communicated to the Stock Exchanges where the Company's shares are listed i.e., NSE .

Procedure for Remote e-voting

In compliance with the provisions of Section 108 of the Act, read with Rule 20 of the Companies (Management and Administration) Rules, 2014; as amended from time to time, Regulation 44 of the Listing Regulations and in terms of SEBI Circular No. SEBI/HO/CFD/CMD/ CIR/P/2020/242 dated December 9, 2020 in relation to e-Voting facility to be provided by listed entities, the Members are provided with the facility to cast their vote electronically, through the e-voting services provided by NSDL, on the resolutions set forth in this Notice. The instructions for e-voting are given herein below.

Commencement of e-voting	End of remote e-voting
9.00 a.m. (IST) on Thursday, May 11, 2023	5.00 p.m. (IST) on Friday, June 09, 2023

E-voting will not be allowed beyond the aforesaid date and time and the e-voting module shall be forthwith disabled by NSDL upon the expiry of the aforesaid period.

The individual shareholders holding securities in demat mode can register directly with the

depository or will have the option of accessing various ESP portals directly from their demat accounts.

How do I vote electronically using NSDL e-Voting system?

The way to vote electronically on NSDL e-Voting system consists of "Two Steps" which are mentioned below:

Step 1: Access to NSDL e-Voting system

A) Login method for e-Voting for Individual shareholders holding securities in demat mode

In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.
Login method for Individual shareholders holding securities in demat mode is given below:

Type of shareholders	Login Method
Individual Shareholders holding securities in demat mode with NSDL.	1. Existing **IDeAS** user can visit the e-Services website of NSDL Viz. https://eservices.nsdl.com either on a Personal Computer or on a mobile. On the e-Services home page click on the "**Beneficial Owner"** icon under **"Login"** which is available under **'IDeAS'** section , this will prompt you to enter your existing User ID and Password. After successful authentication, you will be able to see e-Voting services under Value added services. Click on **"Access to e-Voting"** under e-Voting services and you will be able to see e-Voting page. Click on company name or **e-Voting service provider i.e. NSDL** and you will be re-directed to e-Voting website of NSDL for casting your vote during the remote e-Voting period.

	2. If you are not registered for IDeAS e-Services, option to register is available at https://eservices.nsdl.com. Select **"Register Online for IDeAS Portal"** or click at https://eservices.nsdl.com/SecureWeb/IdeasDirectReg.jsp 3. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsdl.com/ either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/Member' section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or **e-Voting service provider i.e. NSDL** and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period. 4. Shareholders/Members can also download NSDL Mobile App "**NSDL Speede**" facility by scanning the QR code mentioned below for seamless voting experience. **NSDL Mobile App is available on** App Store Google Play

Individual Shareholders holding securities in demat mode with CDSL	1) Users who have opted for CDSL Easi / Easiest facility, can login through their existing user id and password. Option will be made available to reach e-Voting page without any further authentication. The users to login Easi / Easiest are requested to visit CDSL website www.cdslindia.com and click on login icon & New System Myeasi Tab and then user your existing my easi username & password. 2) After successful login the Easi / Easiest user will be able to see the e-Voting option for eligible companies where the evoting is in progress as per the information provided by company. On clicking the evoting option, the user will be able to see e-Voting page of the e-Voting service provider for casting your vote during the remote e-Voting period. Additionally, there is also links provided to access the system of all e-Voting Service Providers, so that the user can visit the e-Voting service providers' website directly. 3) If the user is not registered for Easi/Easiest, option to register is available at CDSL website www.cdslindia.com and click on login & New System Myeasi Tab and then click on registration option. 4) Alternatively, the user can directly access e-Voting page by providing Demat Account Number and PAN No. from a e-Voting link available on www.cdslindia.com home page. The system will authenticate the user by sending OTP on registered Mobile & Email as recorded in the Demat Account. After successful authentication, user will be able to see the e-Voting option where the evoting is in progress and also able to directly access the system of all e-Voting Service Providers.

Individual Shareholders (holding securities in demat mode) login through their depository participants	You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. upon logging in, you will be able to see e-Voting option. Click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period.

Important note: Members who are unable to retrieve User ID/ Password are advised to use Forget User ID and Forget Password option available at abovementioned website.
Helpdesk for Individual Shareholders holding securities in demat mode for any technical issues related to login through Depository i.e. NSDL and CDSL.

Login type	**Helpdesk details**
Individual Shareholders holding securities in demat mode with NSDL	Members facing any technical issue in login can contact NSDL helpdesk by sending a request at evoting@nsdl.co.in or call at toll free no.: 1800 1020 990 and 1800 22 44 30
Individual Shareholders holding securities in demat mode with CDSL	Members facing any technical issue in login can contact CDSL helpdesk by sending a request at helpdesk.evoting@cdslindia.com or contact at toll free no. 1800 22 55 33

B) Login Method for shareholders other than Individual shareholders holding securities in demat mode and shareholders holding securities in physical mode.

How to Log-in to NSDL e-Voting website?

1. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsdl.com/ either on a Personal Computer or on a mobile.
2. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/Member' section.
3. A new screen will open. You will have to enter your User ID, your Password/OTP and a Verification Code as shown on the screen.
   Alternatively, if you are registered for NSDL eservices i.e. IDEAS, you can log-in at https://eservices.nsdl.com/ with your existing IDEAS login. Once you log-in to NSDL eservices after using your log-in credentials, click on e-Voting and you can proceed to Step 2 i.e. Cast your vote electronically.
4. Your User ID details are given below :

Manner of holding shares i.e. Demat (NSDL or CDSL) or Physical	**Your User ID is:**
a) For Members who hold shares in demat account with NSDL.	8 Character DP ID followed by 8 Digit Client ID For example if your DP ID is IN300*** and Client ID is 12****** then your user ID is IN300***12******.
b) For Members who hold shares in demat account with CDSL.	16 Digit Beneficiary ID For example if your Beneficiary ID is 12********** then your user ID is 12**********
c) For Members holding shares in Physical Form.	EVEN Number followed by Folio Number registered with the company For example if folio number is 001*** and EVEN is 101456 then user ID is 101456001***

5. Password details for shareholders other than Individual shareholders are given below:
   a) If you are already registered for e-Voting, then you can user your existing password to login and cast your vote.

   b) If you are using NSDL e-Voting system for the first time, you will need to retrieve the 'initial password' which was communicated to you. Once you retrieve your 'initial password', you need to enter the 'initial password' and the system will force you to change your password.
   c) How to retrieve your 'initial password'?
      (i) If your email ID is registered in your demat account or with the company, your 'initial password' is communicated to you on your email ID. Trace the email sent to you from NSDL from your mailbox. Open the email and open the attachment i.e. a .pdf file. Open the .pdf file. The password to open the .pdf file is your 8 digit client ID for NSDL account, last 8 digits of client ID for CDSL account or folio number for shares held in physical form. The .pdf file contains your 'User ID' and your 'initial password'.
      (ii) If your email ID is not registered, please follow steps mentioned below in **process for those shareholders whose email ids are not registered**

6. If you are unable to retrieve or have not received the " Initial password" or have forgotten your password:
   a) Click on "Forgot User Details/Password?"(If you are holding shares in your demat account with NSDL or CDSL) option available on www.evoting.nsdl.com.
   b) Physical User Reset Password?" (If you are holding shares in physical mode) option available on www.evoting.nsdl.com.
   c) If you are still unable to get the password by aforesaid two options, you can send a request at evoting@nsdl.co.in mentioning your demat account number/folio number, your PAN, your name and your registered address etc.
   d) Members can also use the OTP (One Time Password) based login for casting the votes on the e-Voting system of NSDL.

7. After entering your password, tick on Agree to "Terms and Conditions" by selecting on the check box.
8. Now, you will have to click on "Login" button.
9. After you click on the "Login" button, Home page of e-Voting will open.

Step 2: Cast your vote electronically on NSDL e-Voting system.

How to cast your vote electronically on NSDL e-Voting system?

1. After successful login at Step 1, you will be able to see all the companies "EVEN" in which you are holding shares and whose voting cycle.

2. Select "EVEN" of company for which you wish to cast your vote during the remote e-Voting period.

3. Now you are ready for e-Voting as the Voting page opens.

4. Cast your vote by selecting appropriate options i.e. assent or dissent, verify/modify the number of shares for which you wish to cast your vote and click on "Submit" and also "Confirm" when prompted.

5. Upon confirmation, the message "Vote cast successfully" will be displayed.

6. You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page.

7. Once you confirm your vote on the resolution, you will not be allowed to modify your vote.

General Guidelines for shareholders

1. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) are required to send scanned copy (PDF/JPG Format) of the relevant Board Resolution/ Authority letter etc. with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote, to the Scrutinizer by e-mail to saahilmalhotra42@gmail.com with a copy marked to evoting@nsdl.co.in. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) can also upload their Board Resolution / Power of Attorney / Authority Letter etc. by clicking on **"Upload Board Resolution / Authority Letter"** displayed under **"e-Voting"** tab in their login.

2. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the "Forgot User Details/Password?" or "Physical User Reset Password?" option available on www.evoting.nsdl.com to reset the password.

3. In case of any queries, you may refer the Frequently Asked Questions (FAQs) for Shareholders and e-voting user manual for Shareholders available at the download section of www.evoting.nsdl.com or call on toll free no.: 1800 1020 990 and 1800 22 44 30 or send a request to at Ms. Pallavi Mhatre, Senior Manager, NSDL at evoting@nsdl.co.in

Process for those shareholders whose email ids are not registered with the depositories for procuring user id and password and registration of e mail ids for e-voting for the resolutions set out in this notice:

1. In case shares are held in physical mode please provide Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) by email to cs@suranisteel.com

2. In case shares are held in demat mode, please provide DPID-CLID (16 digit DPID + CLID or 16 digit beneficiary ID), Name, client master or copy of Consolidated Account statement, PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) to cs@suranisteel.com .If you are an Individual shareholders holding securities in demat mode, you are requested to refer to the login method explained at **step 1 (A)** i.e. Login method for e-Voting for Individual shareholders holding securities in demat mode.

3. Alternatively shareholder/members may send a request to evoting@nsdl.co.in for procuring user id and password for e-voting by providing above mentioned documents.

4. In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are required to update their mobile number and email ID correctly in their demat account in order to access e-Voting facility.

EXPLANATORY STATEMENT

(Pursuant to Section 102 of the Companies Act, 2013)

As required under Section 102 of the Companies Act, 2013 (including any re-enactment(s) made thereunder, if any, for the time being in force) (hereinafter referred to as the "**Companies Act**"), the following explanatory statements sets out all material facts relating to the business mentioned under Items no. 1 of the accompanying Notice:

ITEM NO. 1

Your Company is contemplating the preferential issue of Fully Convertible Warrants ("Warrants") in order to meet the working capital requirements and fund needs of the Company, and in view thereof, the Company needs to have enough unissued Authorized Share Capital, so that the requisite number of fresh equity shares pursuant to conversion of warrants may be issued for the purpose of raising sufficient funds.

Presently, the Authorized share Capital of the Company is Rs. 9,00,00,000/- (Rupees Nine Crore Only) divided into 90,00,000 (Ninety Lakh) Equity Shares of Rs.10/- each. The Board of directors, therefore, considers it desirable to increase the Authorized Share Capital of the Company to Rs. 20,00,00,000/- (Rupees Twenty Crores Only) divided into 2,00,00,000 (Two Crore) Equity Shares of Rs.10/- each by creation of additional 1,10,00,000 (One Crore Ten Lakh) equity shares of Rs.10/- (Rupees Ten Only) each, to accommodate the fresh issuance of the shares of the Company pursuant to conversion of the Warrants.

Consequent upon increase in authorized share capital as proposed, the existing Clause V of Memorandum of Association of the Company will also have to be substituted. The draft amended Memorandum of Association will be available for inspection by Members at the website of the Company till the last date of e-voting.

The provisions of the Companies Act require the Company to seek approval of the members for increase in authorized share capital and for consequent alteration of the Capital Clause of the Memorandum of Association; accordingly, the Board recommends the resolution set forth in Item No. 1 for the approval of the members of the Company by means of an Ordinary Resolution.

None of the Directors / Key Managerial Personnel of the Company or their relatives are, in any way, concerned or interested (financial or otherwise) in the resolution except to the extent of their shareholding in the Company, if any.

ITEM NO. 2

The Special Resolution contained in Item No. 2 of the notice, has been proposed pursuant to the provisions of Sections 42 and 62 of the Companies Act, 2013 read with the applicable rules made thereunder, to issue and allot upto 80,52,000 **(Eighty Lakh Fifty Two Thousand)** Fully Convertible Warrants ("Warrants") at an issue price of Rs. 135 (Rupees One Hundred Thirty Five Only) determined

by the Board in accordance with the provisions of Chapter V of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended, aggregating up to **Rs. 108,70,20,000/- (Rupees One Hundred Eight Crores Seventy Lakh and Twenty Thousand Only).**

The proposed Preferential Issue is to be issued to the persons belonging to 'Non-Promoter' Category. The preferential issue shall be made in terms of provisions of Chapter V of the SEBI ICDR Regulations, 2018 and applicable provisions of Companies Act, 2013. The said proposal has been considered and approved by the Board in its meeting held on 10th May, 2023.

The approval of the members of the Company is accordingly being sought by means of a 'Special Resolution' under Sections 42, and 62(1)(c) of the Companies Act, 2013, read with the rules made thereunder, and Regulation 160 of the SEBI ICDR Regulations.

It may please be noted that Mr. Vijay Singla, Mr. Chetan Singla And Ms. Santosh Rani ("Acquirers") had entered into a Share Purchase Agreement (SPA) on March 16, 2023 with the erstwhile promoters of the Company for acquisition of control and 28,14,000 (Twenty Eight Lakh and Fourteen Thousand) Equity Shares representing 33.97% of the paid up equity share capital of the Company pursuant to which an open offer was made by them in terms of the provisions of Regulation 3(1) and Regulation 4 of the Takeover Regulations.

The Acquirers have made an open offer to acquire upto 33,13,600 (Thirty Three Lakh Thirteen Thousand and Six Hundred) Fully Paid-Up Equity Shares representing 40.00% of the Paid up Equity Share Capital of the Target Company at an Offer Price of INR 44.00/- (Indian Rupees Forty Four Only). Pursuant to this Open Offer, the shareholding of the Acquirers would increase from Nil to 61,27,600 (Sixty One Lakh Twenty Seven Thousand Six Hundred) Equity Shares representing 73.97% of the Paid up Equity Share Capital of the Company assuming full acceptances in the takeover open offer.

The details of the issue and other particulars as required in terms of Rule 14(1) of the Companies (Prospectus and Allotment of Securities) Rules, 2014 and Regulation 163 of the SEBI (ICDR), Regulations are set forth below:

I. Objects of the Preferential Issue

The Company intends to utilize the proceeds raised through the issue ("Issue Proceeds") towards the following objects:

1. For Working Capital Requirement
2. Issue Related Expense

(Hereinafter collectively referred to as **"Objects")**

The main Object Clause of Memorandum of Association of our Company enables us to undertake the existing activities and the activities for which the funds are being raised by us through the present Preferential Issue. Further, we confirm that the activities which we have been carrying out till date are in accordance with the Object Clause of our Memorandum of Association.

Utilization of Gross Proceeds

As the funds to be received against warrant conversion will be in tranches and quantum of funds required on different dates may vary therefore, the Broad Range of intended use of the Gross Proceeds of the Issue is as under:

S. No.	Particulars	Total estimated amount to be utilized (Rs. In Crores)*	Tentative timelines for utilization of issue proceeds from the date of receipt of funds
1.	For Working Capital Requirement	108.46	Latest by January 2025
2.	To meet Issue Related Expense	0.26	
TOTAL		**108.70**	

(*) considering 100% conversion of Warrants into Equity Shares within the stipulated time.

Note: In terms of NSE Notice No. NSE/CML/2022/56 dated December 13, 2022, the amount specified for the above-mentioned object of issue size may deviate +/- 10% depending upon the future circumstances.

Schedule of Implementation and Deployment of Funds

Since present preferential issue is for convertible warrants, issue proceeds for warrants shall be received by the Company in 18 months period from the date of allotment of warrants in terms of Chapter V of the SEBI ICDR Regulation, and as estimated by our management, the entire proceeds received from the issue would be utilized for all the above-mentioned objects, in phases, as per the company's business requirements and availability of issue proceeds, latest by January 2025.

Interim Use of Proceeds

Our Company, in accordance with the policies formulated by our Board from time to time, will have flexibility to deploy the Gross Proceeds. Pending utilization of the Gross Proceeds for the purposes described above, our Company intends to deposit the Gross Proceeds only with scheduled commercial banks included in the second schedule of the Reserve Bank of India Act, 1934 or deploy funds for such businesses opportunities as may be allowed by the Board from time to time.

II. Monitoring of Utilization of Funds

- In terms of Regulation 162A of the SEBI ICDR Regulations, the Company has appointed CARE Ratings Limited, SEBI registered Credit Rating Agency as the monitoring agency to monitor the use of the proceeds of the Issue.
- The monitoring agency shall submit its report to the Company in the format specified in Schedule XI of SEBI ICDR Regulations on a quarterly basis, till 100% of the proceeds of the issue have been utilized.
- The Board of Directors and the management of the Company shall provide their comments on the findings of the monitoring agency as specified in Schedule XI of SEBI ICDR Regulations.
- The Company shall, within 45 days from the end of each quarter, upload the report of the monitoring agency on its website and also submit the same to the Stock Exchanges.

III. Particulars of the offer including the maximum number of specified securities to be issued and date of passing of board resolution:

Preferential Issue of upto 80,52,000 (Eighty Lakh Fifty Two Thousand Only) Fully Convertible Warrants ('Warrants') at an issue price of Rs. 135/- (Rupees One Hundred Thirty Five Only) determined by the Board in accordance with the provisions of Chapter V of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended, aggregating up to **Rs. 108,70,20,000/- (Rupees One Hundred Eight Crores Seventy Lakh and Twenty Thousand Only)** as approved in the meeting of the Board of Directors of the Company held on May 10, 2023.

IV. The intent of the promoters, directors or key management personnel of the issuer to subscribe to the offer.

None of the Promoters, directors or key managerial personnel intend to subscribe to the present preferential issue. All the proposed allottees belong to Non-Promoter /Public Category.

V. The Shareholding Pattern of the issuer before and after the preferential issue.

The shareholding pattern of the Company before and after the proposed preferential issue to 'Non-Promoter' is likely to be as follows:

Category	Pre-Issue Shareholding Structure		Warrants to be Allotted	Post-Issue Shareholding (Presuming full conversion of Warrants)	
	No. of Shares	% age		No. of Shares	% age*
(A) Promoter Shareholding					
(1) Indian	**28,14,000**	**33.97**	**0**	**28,14,000**	**17.23**
(a) Individuals & HUF	28,14,000	33.97	0	28,14,000	17.23
(b) Bodies Corporate	-	-	-	-	-
Sub Total (A)(1)	28,14,000	33.97	0	28,14,000	17.23

(2) Foreign promoters	-	-	-	-	-
Total Promoter shareholding A=A1 +A2	**28,14,000**	**33.97**	**0**	**28,14,000**	**17.23**
(B) Public Shareholding					
B1) Institutional Investors	-		-	-	-
B2) Central Govt./Stat Govt./POI	-	-	-	-	-
B3) Non-Institutional Investors	**-**	**-**	-	**-**	**-**
Individuals & HUF	53,14,000	64.15	66,43,000	1,19,57,000	73.19
Body Corporate	1,56,000	1.88	14,09,000	15,65,000	9.58
Others (Including NRI)	-	-	-	-	-
Total Public Shareholding B=B1+B2+B3	**54,70,000**	**66.03**	**-**	**1,35,22,000**	**82.77**
C) Non-Promoter - Non-Public	-	-	-		-
Grand Total (A+B+C)	**82,84,000**	**100**	**80,52,000**	**1,63,36,000**	**100.00**

These percentages have been calculated on the basis of post preferential issue capital on fully diluted basis.

Notes:

(1) *The pre-issue shareholding pattern is as on the latest BENPOS date i.e. 5th May, 2023*

(2) *Post shareholding structure may change depending upon any other corporate action in between.*

(3) *The warrants to be converted over a period of 18 months from the date of allotment.*

(4) *Mr. Vijay Singla, Mr. Chetan Singla And Ms. Santosh Rani have made an open offer to acquire upto 33,13,600 (Thirty Three Lakh Thirteen Thousand and Six Hundred) Fully Paid-Up Equity Shares representing 40.00% of the Paid up Equity Share Capital of the Target Company at an Offer Price of INR 44.00/- (Indian Rupees Forty Four Only). Pursuant to this Open Offer, the shareholding of the Acquirers would increase from Nil to 61,27,600 (Sixty One Lakh Twenty Seven Thousand Six Hundred) Equity Shares representing 73.97% of the Paid up Equity Share Capital of the Company assuming full acceptances in the takeover open offer.*

VI. Proposed time limit within which the allotment shall be complete:

In terms of SEBI ICDR Regulations, the preferential allotment of said Warrants will be completed within a period of 15 (fifteen) days from the date of passing of special resolution. Provided that where the allotment is pending on account of pendency of any application for approval or permission by any regulatory authority, if applicable, the allotment would be completed within 15 (fifteen) days from the date of such approval or within such further period as may be prescribed or allowed by SEBI, stock exchange(s) or other concerned authorities.

VII. Number of persons to whom allotment on preferential basis has already been made during the year, in terms of number of securities as well as price: Not Applicable, since the Company has not made preferential issue of any Security during the year.

VIII. The identity of the natural persons who are the ultimate beneficial owners of the securities

proposed to be allotted and/or who ultimately control the proposed allottee(s):

Identity of the ultimate beneficial owners of the securities proposed to be allotted:

SR.	NAME OF THE PROPOSED ALLOTTEE	CATEGORY	NAME OF THE BENEFICIAL OWNERS
1	Kiran Bala Gupta	Non-Promoter	Not applicable
2	Himank Gupta	Non-Promoter	Not applicable
3	Love Bansal HUF	Non-Promoter	Love Bansal
4	Sanjeev Kumar	Non-Promoter	Not applicable
5	Priyanka Rustagi	Non-Promoter	Not applicable
6	Ponika Multitrade Private Limited	Non-Promoter	Surendra Shaymsunder Bang
7	Karan Gupta	Non-Promoter	Not applicable
8	Sameer Mittal	Non-Promoter	Not applicable
9	Msl Holdings Private Limited	Non-Promoter	Anoop Gupta
10	K E I Metals Private Limited	Non-Promoter	Rishi Aggarwal
11	Kanav Chopra	Non-Promoter	Not applicable
12	Kush Bansal HUF	Non-Promoter	Kush Bansal
13	Prajal Bhandari	Non-Promoter	Not applicable
14	Yatharth Kansal	Non-Promoter	Not applicable
15	Anil Kumar Huf	Non-Promoter	Anil Kumar
16	Maithili Tradecom Private Limited	Non-Promoter	Vimlesh Ramdular
17	Sunil Bhandari	Non-Promoter	Not applicable
18	Rekha Bhandari	Non-Promoter	Not applicable
19	Gaurav Gupta	Non-Promoter	Not applicable
20	Punya Gupta	Non-Promoter	Not applicable
21	Agro Trade Solutions	Non-Promoter	Agam Gupta
22	Iqbal Ashrafali Ahmed	Non-Promoter	Not applicable
23	Manisha Loonkar	Non-Promoter	Not applicable
24	Bindal Finvest Pvt Ltd	Non-Promoter	Suresh Kumar Saraf
25	Sanjay Mehtani	Non-Promoter	Not applicable
26	Shubham Singhal	Non-Promoter	Not applicable
27	Adarsh Garg	Non-Promoter	Not applicable
28	Aashna Gupta	Non-Promoter	Not applicable
29	Ruchi Gupta	Non-Promoter	Not applicable
30	Nimrat Bedi	Non-Promoter	Not applicable
31	Som Lata	Non-Promoter	Not applicable
32	Ambey Industries	Non-Promoter	Kiran Garg, Puneet Kumar, Mohinder Pal
33	Vivek Garg	Non-Promoter	Not applicable
34	Ageless Capital And Finance Private Limited	Non-Promoter	Krishana Basappa Poojari
35	Laxmi Trade Solutions	Non-Promoter	Yashpal Gupta
36	Mausam Shah	Non-Promoter	Not applicable
37	Nidhi Agarwal	Non-Promoter	Not applicable
38	Rohan Agarwal	Non-Promoter	Not applicable

SR.	NAME OF THE PROPOSED ALLOTTEE	CATEGORY	NAME OF THE BENEFICIAL OWNERS
39	Tahzeeb Mohamed Tariq	Non-Promoter	Not applicable
40	Trishakti Power Holdings Private Limited	Non-Promoter	Paresh Rajnikant Doshi
41	R P S Khurana	Non-Promoter	Not applicable
42	Radhika Chopra	Non-Promoter	Not applicable
43	Maninder Singh	Non-Promoter	Not applicable
44	Surekha Rani	Non-Promoter	Not applicable
45	Harish Gupta	Non-Promoter	Not applicable
46	Vaibhav Jindal	Non-Promoter	Not applicable
47	Nupur Jain	Non-Promoter	Not applicable
48	Jigna Tezas Shah	Non-Promoter	Not applicable
49	Manan Ankur Shah	Non-Promoter	Not applicable
50	Gurmeet Singh Virdi	Non-Promoter	Not applicable
51	Jatinder Singh Nagpal	Non-Promoter	Not applicable
52	Neeraj Bansal	Non-Promoter	Not applicable
53	Piyush Tantia	Non-Promoter	Not applicable
54	Harish Kumar Jaipuria	Non-Promoter	Not applicable
55	Santosh Jaipuria	Non-Promoter	Not applicable
56	Sartaj Mehta	Non-Promoter	Not applicable
57	Ravikiran Nagpal	Non-Promoter	Not applicable
58	Narender Singh Nagpal	Non-Promoter	Not applicable
59	Sonu Gupta	Non-Promoter	Not applicable
60	Vimal Kumar Jindal	Non-Promoter	Not applicable
61	Aman Gupta	Non-Promoter	Not applicable
62	Surinder Kumar	Non-Promoter	Not applicable
63	Gursharan Singh	Non-Promoter	Not applicable
64	Avneet Chawla	Non-Promoter	Not applicable
65	Charanjit Singh	Non-Promoter	Not applicable
66	Umr Fruits Private Limited	Non-Promoter	Arvind Singla
67	Abhinav Gupta	Non-Promoter	Not applicable
68	Arjun Gandotra	Non-Promoter	Not applicable
69	Prabhdeep Singh Ghai	Non-Promoter	Not applicable
70	Manisha Jain	Non-Promoter	Not applicable
71	Nitin Jain HUF	Non-Promoter	Nitin Jain
72	Anu Gupta	Non-Promoter	Not applicable
73	Aarsh Gupta	Non-Promoter	Not applicable
74	Meena Kansal	Non-Promoter	Not applicable
75	Sanya Kansal	Non-Promoter	Not applicable
76	Narain Dass Singla & Sons HUF	Non-Promoter	Narain Dass
77	Kangan Kansal	Non-Promoter	Not applicable
78	Vinay Anand	Non-Promoter	Not applicable
79	Gautam Shroff	Non-Promoter	Not applicable
80	Neelu Sinha	Non-Promoter	Not applicable
81	Sukhwant Singh	Non-Promoter	Not applicable
82	Nidhi	Non-Promoter	Not applicable
83	Shivani Bajaj	Non-Promoter	Not applicable
84	Tushar Kapoor	Non-Promoter	Not applicable

SR.	NAME OF THE PROPOSED ALLOTTEE	CATEGORY	NAME OF THE BENEFICIAL OWNERS
85	SK Gupta And Sons HUF	Non-Promoter	SK Gupta
86	Sweeny Gupta	Non-Promoter	Not applicable
87	Harshit Jindal	Non-Promoter	Not applicable
88	Anil Singhal	Non-Promoter	Not applicable
89	Labdhi Kaushal Shah	Non-Promoter	Not applicable
90	Ritika Ranjan	Non-Promoter	Not applicable
91	Alka Harkut	Non-Promoter	Not applicable
92	Roshni Vinayak Jaksan	Non-Promoter	Not applicable
93	Naman Shah	Non-Promoter	Not applicable
94	Vaishali Udeshi	Non-Promoter	Not applicable
95	Lakshay Jindal	Non-Promoter	Not applicable
96	Prem Kumar Jain	Non-Promoter	Not applicable
97	Bindu Chawla	Non-Promoter	Not applicable
98	Jatinder Singh Chawla	Non-Promoter	Not applicable
99	Rahul Gauba	Non-Promoter	Not applicable
100	Neetika Garg	Non-Promoter	Not applicable
101	Rajiv Raja Jaggi	Non-Promoter	Not applicable
102	Raghav Raja Jaggi	Non-Promoter	Not applicable
103	Harmandeep Kaur	Non-Promoter	Not applicable
104	Parmod Kumar	Non-Promoter	Not applicable
105	Agneh Raj Sikka	Non-Promoter	Not applicable
106	Rajeev Sikka	Non-Promoter	Not applicable
107	Jai Raj Sikka	Non-Promoter	Not applicable
108	Shubham Biyani	Non-Promoter	Not applicable
109	Ashok Kumar	Non-Promoter	Not applicable
110	Aditya Aggarwal	Non-Promoter	Not applicable

#Post Issue Shareholding will change in case of any corporate action in between.

IX. The percentage of post preferential issue capital that may be held by the allottee(s) and change in control, if any, in the issuer consequent to the preferential issue.

SR.	NAME OF THE PROPOSED ALLOTTEE	PRE-PREFERNTIAL HOLDING	PRE-PREFRENTIAL %	PROPOSED WARRANT QUANTITY TO BE ALLOTTED	POST ISSUE SHAREHOLDING ASSUMING FULL CONVERSION	POST ISSUE % ASSUMING FULL CONVERSION
1	KIRAN BALA GUPTA	0	0	4,00,000	4,00,000	2.449
2	HIMANK GUPTA	82000	0.99	3,50,000	4,32,000	2.644
3	LOVE BANSAL HUF	0	0	3,00,000	3,00,000	1.836
4	SANJEEV KUMAR	0	0	2,50,000	2,50,000	1.530
5	Priyanka Rustagi	0	0	2,22,000	2,22,000	1.359
6	Ponika Multitrade Private Limited	0	0	2,22,000	2,22,000	1.359
7	KARAN GUPTA	0	0	2,00,000	2,00,000	1.224
8	SAMEER MITTAL	0	0	2,00,000	2,00,000	1.224
9	MSL HOLDINGS PRIVATE LIMITED	0	0	2,00,000	2,00,000	1.224

10	K E I METALS PRIVATE LIMITED	0	0	2,00,000	2,00,000	1.224
11	KANAV CHOPRA	0	0	2,00,000	2,00,000	1.224
12	KUSH BANSAL HUF	0	0	2,00,000	2,00,000	1.224
13	PRAJAL BHANDARI	0	0	2,00,000	2,00,000	1.224
14	YATHARTH KANSAL	0	0	2,00,000	2,00,000	1.224
15	ANIL KUMAR HUF	0	0	2,00,000	2,00,000	1.224
16	Maithili Tradecom Private Limited	0	0	1,92,000	1,92,000	1.175
17	SUNIL BHANDARI	0	0	1,50,000	1,50,000	0.918
18	REKHA BHANDARI	0	0	1,50,000	1,50,000	0.918
19	GAURAV GUPTA	0	0	1,50,000	1,50,000	0.918
20	PUNYA GUPTA	0	0	1,50,000	1,50,000	0.918
21	Agro Trade Solutions	0	0	1,48,000	1,48,000	0.906
22	Iqbal Ashrafali Ahmed	0	0	1,48,000	1,48,000	0.906
23	Manisha Loonkar	0	0	1,48,000	1,48,000	0.906
24	Bindal Finvest Pvt Ltd	0	0	1,10,000	1,10,000	0.673
25	SANJAY MEHTANI	0	0	1,00,000	1,00,000	0.612
26	SHUBHAM SINGHAL	0	0	1,00,000	1,00,000	0.612
27	ADARSH GARG	0	0	1,00,000	1,00,000	0.612
28	AASHNA GUPTA	2000	0.024	1,00,000	1,02,000	0.624
29	RUCHI GUPTA	0	0	1,00,000	1,00,000	0.612
30	NIMRAT BEDI	0	0	1,00,000	1,00,000	0.612
31	SOM LATA	0	0	1,00,000	1,00,000	0.612
32	AMBEY INDUSTRIES	0	0	90,000	90,000	0.551
33	VIVEK GARG	0	0	75,000	75,000	0.459
34	Ageless Capital and Finance Private Limited	0	0	74,000	74,000	0.453
35	Laxmi Trade Solutions	0	0	74,000	74,000	0.453
36	Mausam Shah	0	0	74,000	74,000	0.453
37	Nidhi Agarwal	0	0	74,000	74,000	0.453
38	Rohan Agarwal	0	0	74,000	74,000	0.453
39	Tahzeeb Mohamed Tariq	0	0	74,000	74,000	0.453
40	Trishakti Power Holdings Private Limited	0	0	74,000	74,000	0.453
41	R P S KHURANA	0	0	70,000	70,000	0.429
42	Radhika Chopra	0	0	56,000	56,000	0.343
43	MANINDER SINGH	0	0	50,000	50,000	0.306
44	SUREKHA RANI	0	0	50,000	50,000	0.306
45	HARISH GUPTA	0	0	50,000	50,000	0.306
46	VAIBHAV JINDAL	0	0	50,000	50,000	0.306
47	NUPUR JAIN	0	0	50,000	50,000	0.306
48	Jigna Tezas Shah	0	0	44,000	44,000	0.269
49	Manan Ankur Shah	0	0	44,000	44,000	0.269
50	GURMEET SINGH VIRDI	0	0	40,000	40,000	0.245
51	JATINDER SINGH NAGPAL	0	0	40,000	40,000	0.245
52	NEERAJ BANSAL	0	0	40,000	40,000	0.245
53	PIYUSH TANTIA	0	0	40,000	40,000	0.245
54	Harish Kumar Jaipuria	0	0	38,000	38,000	0.233
55	Santosh Jaipuria	0	0	38,000	38,000	0.233
56	SARTAJ MEHTA	0	0	30,000	30,000	0.184

57	RAVIKIRAN NAGPAL	0	0	30,000	30,000	0.184
58	NARENDER SINGH NAGPAL	0	0	30,000	30,000	0.184
59	SONU GUPTA	0	0	30,000	30,000	0.184
60	VIMAL KUMAR JINDAL	0	0	30,000	30,000	0.184
61	AMAN GUPTA	0	0	30,000	30,000	0.184
62	SURINDER KUMAR	0	0	30,000	30,000	0.184
63	GURSHARAN SINGH	0	0	26,000	26,000	0.159
64	AVNEET CHAWLA	0	0	25,000	25,000	0.153
65	CHARANJIT SINGH	0	0	25,000	25,000	0.153
66	UMR FRUITS PRIVATE LIMITED	0	0	25,000	25,000	0.153
67	ABHINAV GUPTA	0	0	25,000	25,000	0.153
68	ARJUN GANDOTRA	0	0	25,000	25,000	0.153
69	PRABHDEEP SINGH GHAI	0	0	25,000	25,000	0.153
70	MANISHA JAIN	0	0	25,000	25,000	0.153
71	NITIN JAIN HUF	0	0	25,000	25,000	0.153
72	ANU GUPTA	0	0	25,000	25,000	0.153
73	AARSH GUPTA	0	0	25,000	25,000	0.153
74	MEENA KANSAL	0	0	25,000	25,000	0.153
75	SANYA KANSAL	0	0	25,000	25,000	0.153
76	NARAIN DASS SINGLA & SONS HUF	0	0	25,000	25,000	0.153
77	KANGAN KANSAL	0	0	25,000	25,000	0.153
78	VINAY ANAND	0	0	25,000	25,000	0.153
79	GAUTAM SHROFF	0	0	25,000	25,000	0.153
80	NEELU SINHA	0	0	20,000	20,000	0.122
81	SUKHWANT SINGH	8000	0.097	20,000	28,000	0.171
82	NIDHI	0	0	20,000	20,000	0.122
83	SHIVANI BAJAJ	0	0	20,000	20,000	0.122
84	TUSHAR KAPOOR	0	0	20,000	20,000	0.122
85	SK GUPTA AND SONS HUF	0	0	20,000	20,000	0.122
86	SWEENY GUPTA	0	0	20,000	20,000	0.122
87	HARSHIT JINDAL	0	0	20,000	20,000	0.122
88	ANIL SINGHAL	0	0	20,000	20,000	0.122
89	Labdhi Kaushal Shah	0	0	18,000	18,000	0.110
90	Ritika Ranjan	0	0	18,000	18,000	0.110
91	Alka Harkut	0	0	18,000	18,000	0.110
92	ROSHNI VINAYAK JAKSAN	0	0	15,000	15,000	0.092
93	Naman Shah	0	0	14,000	14,000	0.086
94	Vaishali Udeshi	0	0	14,000	14,000	0.086
95	LAKSHAY JINDAL	0	0	14,000	14,000	0.086
96	PREM KUMAR JAIN	0	0	12,000	12,000	0.073
97	BINDU CHAWLA	0	0	10,000	10,000	0.061
98	JATINDER SINGH CHAWLA	0	0	10,000	10,000	0.061
99	RAHUL GAUBA	0	0	10,000	10,000	0.061
100	NEETIKA GARG	0	0	10,000	10,000	0.061
101	RAJIV RAJA JAGGI	0	0	10,000	10,000	0.061
102	RAGHAV RAJA JAGGI	0	0	10,000	10,000	0.061

103	HARMANDEEP KAUR	0	0	10,000	10,000	0.061
104	PARMOD KUMAR	0	0	10,000	10,000	0.061
105	AGNEH RAJ SIKKA	0	0	10,000	10,000	0.061
106	RAJEEV SIKKA	0	0	10,000	10,000	0.061
107	JAI RAJ SIKKA	0	0	10,000	10,000	0.061
108	SHUBHAM BIYANI	0	0	10,000	10,000	0.061
109	ASHOK KUMAR	0	0	10,000	10,000	0.061
110	ADITYA AGGARWAL	0	0	10,000	10,000	0.061

(*) These percentages have been calculated on the basis of post-preferential share capital of the Company on fully diluted basis

Note: *The post holding may vary depending upon any other corporate action in between.*

As a result of the proposed preferential issue of Warrants, there will be no change in the control or management of the Company. However, voting rights will change in tandem with the shareholding pattern.

X. Lock-in Period:

(a) Warrants and Equity Shares to be allotted upon conversion of warrants, shall be subject to lock-in in accordance with Chapter V of the SEBI ICDR Regulations.
(b) The entire pre-preferential allotment shareholding, if any, of the Proposed Allottees, shall be locked-in as per Chapter V of the SEBI ICDR Regulations.

XI. Issue price and Relevant Date:

In terms of Regulation 161 of SEBI (ICDR) Regulations, 2018 the Relevant Date has been reckoned as **Wednesday, May 10, 2023**, for the purpose of computation of issue price/conversion price of Warrants.

The Equity Shares of the Company are listed on NSE only and are frequently traded on NSE as per the provisions of SEBI ICDR Regulations as on the Relevant Date. In terms of the provisions of Regulation 164 of the SEBI ICDR Regulations. The **minimum price** per Warrant was considered higher of the price determined through following methods:

i. In terms of the provisions of Regulation 164 of the SEBI ICDR Regulations, is the minimum issue price at which the Warrants may be issued computes to **Rs. 133.17 (Rupees One Hundred Thirty Three and Seventeen Paisa Only)** each.

ii. Method of determination of price as per the Articles of Association of the Company – Not Applicable as the Articles of Association of the Company are silent on the determination of a floor price/ minimum price of the shares issued on preferential basis.

The price of the Warrants to be allotted on preferential basis is **135/- (Rupees One Hundred Thirty Five Only)** each to the proposed allottees, which is higher than the above-mentioned prices.

XII. Undertakings:

- None of the Company, its Directors or Promoters are categorized as willful defaulter(s) or a fraudulent borrower by any bank or financial institution or consortium thereof, in accordance with the guidelines on willful defaulters issued by Reserve Bank of India. Consequently, the undertaking required under Regulation 163(1)(i) is not applicable.

- None of its Directors or Promoters is fugitive economic offenders as defined under the SEBI ICDR Regulations.

- As the equity shares have been listed on a recognized Stock Exchange for a period of more than 90 trading days as on the Relevant Date, the provisions of Regulation 164(3) of SEBI ICDR Regulations governing re-computation of the price of shares shall not be applicable. Consequently, the undertaking required under Regulation 163(1)(g) and Regulation163(1)(h) is not applicable.

- None of the allottees have sold or transferred any Equity Shares during the 90 trading days preceding the relevant date.

XIII. Disclosures specified in Schedule VI of ICDR Regulations, if the issuer or any of its promoters or directors is a willful defaulter or fraudulent borrower: Not Applicable

XIV. The current and proposed status of the allottee(s) post the preferential issues namely, promoter or non-promoter:

SR.	NAME OF THE PROPOSED ALLOTTEE	CURRENT STATUS	POST STATUS
1	Kiran Bala Gupta	Non-Promoter	Non-Promoter
2	Himank Gupta	Non-Promoter	Non-Promoter
3	Love Bansal Huf	Non-Promoter	Non-Promoter
4	Sanjeev Kumar	Non-Promoter	Non-Promoter
5	Priyanka Rustagi	Non-Promoter	Non-Promoter
6	Ponika Multitrade Private Limited	Non-Promoter	Non-Promoter
7	Karan Gupta	Non-Promoter	Non-Promoter
8	Sameer Mittal	Non-Promoter	Non-Promoter
9	Msl Holdings Private Limited	Non-Promoter	Non-Promoter
10	K E I Metals Private Limited	Non-Promoter	Non-Promoter
11	Kanav Chopra	Non-Promoter	Non-Promoter
12	Kush Bansal Huf	Non-Promoter	Non-Promoter
13	Prajal Bhandari	Non-Promoter	Non-Promoter
14	Yatharth Kansal	Non-Promoter	Non-Promoter
15	Anil Kumar Huf	Non-Promoter	Non-Promoter
16	Maithili Tradecom Private Limited	Non-Promoter	Non-Promoter
17	Sunil Bhandari	Non-Promoter	Non-Promoter
18	Rekha Bhandari	Non-Promoter	Non-Promoter
19	Gaurav Gupta	Non-Promoter	Non-Promoter
20	Punya Gupta	Non-Promoter	Non-Promoter
21	Agro Trade Solutions	Non-Promoter	Non-Promoter
22	Iqbal Ashrafali Ahmed	Non-Promoter	Non-Promoter
23	Manisha Loonkar	Non-Promoter	Non-Promoter
24	Bindal Finvest Pvt Ltd	Non-Promoter	Non-Promoter
25	Sanjay Mehtani	Non-Promoter	Non-Promoter
26	Shubham Singhal	Non-Promoter	Non-Promoter
27	Adarsh Garg	Non-Promoter	Non-Promoter
28	Aashna Gupta	Non-Promoter	Non-Promoter
29	Ruchi Gupta	Non-Promoter	Non-Promoter
30	Nimrat Bedi	Non-Promoter	Non-Promoter
31	Som Lata	Non-Promoter	Non-Promoter
32	Ambey Industries	Non-Promoter	Non-Promoter
33	Vivek Garg	Non-Promoter	Non-Promoter
34	Ageless Capital And Finance Private Limited	Non-Promoter	Non-Promoter
35	Laxmi Trade Solutions	Non-Promoter	Non-Promoter

36	Mausam Shah	Non-Promoter	Non-Promoter
37	Nidhi Agarwal	Non-Promoter	Non-Promoter
38	Rohan Agarwal	Non-Promoter	Non-Promoter
39	Tahzeeb Mohamed Tariq	Non-Promoter	Non-Promoter
40	Trishakti Power Holdings Private Limited	Non-Promoter	Non-Promoter
41	R P S Khurana	Non-Promoter	Non-Promoter
42	Radhika Chopra	Non-Promoter	Non-Promoter
43	Maninder Singh	Non-Promoter	Non-Promoter
44	Surekha Rani	Non-Promoter	Non-Promoter
45	Harish Gupta	Non-Promoter	Non-Promoter
46	Vaibhav Jindal	Non-Promoter	Non-Promoter
47	Nupur Jain	Non-Promoter	Non-Promoter
48	Jigna Tezas Shah	Non-Promoter	Non-Promoter
49	Manan Ankur Shah	Non-Promoter	Non-Promoter
50	Gurmeet Singh Virdi	Non-Promoter	Non-Promoter
51	Jatinder Singh Nagpal	Non-Promoter	Non-Promoter
52	Neeraj Bansal	Non-Promoter	Non-Promoter
53	Piyush Tantia	Non-Promoter	Non-Promoter
54	Harish Kumar Jaipuria	Non-Promoter	Non-Promoter
55	Santosh Jaipuria	Non-Promoter	Non-Promoter
56	Sartaj Mehta	Non-Promoter	Non-Promoter
57	Ravikiran Nagpal	Non-Promoter	Non-Promoter
58	Narender Singh Nagpal	Non-Promoter	Non-Promoter
59	Sonu Gupta	Non-Promoter	Non-Promoter
60	Vimal Kumar Jindal	Non-Promoter	Non-Promoter
61	Aman Gupta	Non-Promoter	Non-Promoter
62	Surinder Kumar	Non-Promoter	Non-Promoter
63	Gursharan Singh	Non-Promoter	Non-Promoter
64	Avneet Chawla	Non-Promoter	Non-Promoter
65	Charanjit Singh	Non-Promoter	Non-Promoter
66	Umr Fruits Private Limited	Non-Promoter	Non-Promoter
67	Abhinav Gupta	Non-Promoter	Non-Promoter
68	Arjun Gandotra	Non-Promoter	Non-Promoter
69	Prabhdeep Singh Ghai	Non-Promoter	Non-Promoter
70	Manisha Jain	Non-Promoter	Non-Promoter
71	Nitin Jain Huf	Non-Promoter	Non-Promoter
72	Anu Gupta	Non-Promoter	Non-Promoter
73	Aarsh Gupta	Non-Promoter	Non-Promoter
74	Meena Kansal	Non-Promoter	Non-Promoter
75	Sanya Kansal	Non-Promoter	Non-Promoter
76	Narain Dass Singla & Sons Huf	Non-Promoter	Non-Promoter
77	Kangan Kansal	Non-Promoter	Non-Promoter
78	Vinay Anand	Non-Promoter	Non-Promoter
79	Gautam Shroff	Non-Promoter	Non-Promoter
80	Neelu Sinha	Non-Promoter	Non-Promoter
81	Sukhwant Singh	Non-Promoter	Non-Promoter
82	Nidhi	Non-Promoter	Non-Promoter

83	Shivani Bajaj	Non-Promoter	Non-Promoter
84	Tushar Kapoor	Non-Promoter	Non-Promoter
85	Sk Gupta And Sons Huf	Non-Promoter	Non-Promoter
86	Sweeny Gupta	Non-Promoter	Non-Promoter
87	Harshit Jindal	Non-Promoter	Non-Promoter
88	Anil Singhal	Non-Promoter	Non-Promoter
89	Labdhi Kaushal Shah	Non-Promoter	Non-Promoter
90	Ritika Ranjan	Non-Promoter	Non-Promoter
91	Alka Harkut	Non-Promoter	Non-Promoter
92	Roshni Vinayak Jaksan	Non-Promoter	Non-Promoter
93	Naman Shah	Non-Promoter	Non-Promoter
94	Vaishali Udeshi	Non-Promoter	Non-Promoter
95	Lakshay Jindal	Non-Promoter	Non-Promoter
96	Prem Kumar Jain	Non-Promoter	Non-Promoter
97	Bindu Chawla	Non-Promoter	Non-Promoter
98	Jatinder Singh Chawla	Non-Promoter	Non-Promoter
99	Rahul Gauba	Non-Promoter	Non-Promoter
100	Neetika Garg	Non-Promoter	Non-Promoter
101	Rajiv Raja Jaggi	Non-Promoter	Non-Promoter
102	Raghav Raja Jaggi	Non-Promoter	Non-Promoter
103	Harmandeep Kaur	Non-Promoter	Non-Promoter
104	Parmod Kumar	Non-Promoter	Non-Promoter
105	Agneh Raj Sikka	Non-Promoter	Non-Promoter
106	Rajeev Sikka	Non-Promoter	Non-Promoter
107	Jai Raj Sikka	Non-Promoter	Non-Promoter
108	Shubham Biyani	Non-Promoter	Non-Promoter
109	Ashok Kumar	Non-Promoter	Non-Promoter
110	Aditya Aggarwal	Non-Promoter	Non-Promoter

XV. Practicing Company Secretary's Certificate:

The certificate from Mr. Sahil Malhotra , CP No. 14791, Practicing Company Secretaries, certifying that the preferential issue of Warrants is being made in accordance with requirements of Chapter V of SEBI ICDR Regulations has been obtained considering the said preferential issue. The copy of said certificate shall be available for inspection by the members and the same may be accessed on the Company's website at the link: www.suranisteel.com.

XVI. Details of the Directors, Key Managerial Persons or their relatives, in any way, concerned or interested in the said resolution:

The above preferential allotment is proposed for Non- Promoter Public Category. None of the Directors/ Key Managerial Personnel of the Company/ their relatives is/ are, in any way, concerned or interested, financially or otherwise, in the resolution set out at Item no. 1 of this Notice except to the extent of their respective shareholding in the Company, if any.

The Board of Directors recommends the resolutions as set out in Item No. 2 of this notice for the issue of Warrants on a preferential basis, to the proposed allottees by way of **Special Resolution**.

By order of the Board of Directors
For **Surani Steel Tubes Limited**

Sd/-
Mohinder Singh
Company Secretary & Compliance Officer
M. No.: 21857

Place: Chandigarh
Date: 10th May, 2023