



Annexure IV

The Chief General Manager
Listing Operation,
BSE Limited,
20th Floor, P. J. Towers,
Dalal Street,
Mumbai – 400 001.

Dear Sir,

Sub: Application for “In-principle approval” prior to issue and allotment of 5,00,000 Equity Shares and 2,00,000 Warrants Convertible into Equity Shares on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

I, **Satyajit Mishra, Proprietor of Satyajit Mishra & Co., Practicing Company Secretary** have verified the relevant records and documents of **Sunita Tools Limited** with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

- a) None of the proposed allottee(s) has/ have sold any equity shares of the company during the 90 trading days preceding the relevant date. Further, where the proposed allottee(s) is/ are promoter/ promoter group entity, then none of entities in the promoter and promoter group entities has/ have sold any equity share of the company during the 90 trading days preceding the relevant date.
- b) Below mentioned proposed allottees does not hold any equity shares of the issuer for a period starting from the relevant date till the date of preferential allotment.

1. Chitresh Kumar Lunawat
2. Aarson Investment
3. Deepak Jugalkishore Chokhani
4. Dipak Raheja
5. Harrmit Dillon
6. Pooja Rahul Shah
7. Raghav Chaudhary
8. Harsha Talreja
9. Rakesh Laroia
10. Ten Eighty Investments
11. Vibha Gupta
12. Vivek Singh
13. WOW Investments



14. Nandura Estates
15. Anant Agarwal
16. Amit R Agarwal
17. Anshu Gupta
18. Ritesh Srivastava
19. Anita Sethi
20. Mithin Prakash Nimje
21. Mayank Singh
22. Gopal Sharma
23. Shalin Trivedi
24. Rajeshwari Gupta
25. Niagra Growth Private Limited
26. Mansi Dua
27. Sharat Kumar
28. Deepak Dhanwantra Shah (HUF)
29. Nandini Satish pandey
30. Sarvagya sanjay pandey
31. Shruti Sanjay Padey
32. Niranjan I sheth
33. Neeta sujit pandey

- c) The pre-preferential shareholding of each of proposed allottee(s) is under process for lock in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018. Further, there is no sale/ pledge of pre-preferential holding from Relevant Date till date of lock-in. The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

Total Number of Shares:

Sr. No.	Name of Proposed Allottee	Quantity	Pre-preferential holding	Lock-in details	
				From	To
1.	Chitresh Kumar Lunawat	5,000	Nil	-	-
2.	Aarson Investment	18,000	Nil	-	-
3.	Deepak Jugalkishore Chokhani	15,000	Nil	-	-
4.	Dipak Raheja	18,000	Nil	-	-
5.	Harrmit Dillon	6,000	Nil	-	-
6.	Pooja Rahul Shah	5,000	Nil	-	-
7.	Raghav Chaudhary		Nil	-	-



		3,000			
8.	Harsha Talreja	5,000	Nil	-	-
9.	Sandeep Singh	70,000	6000	Under Process	Under Process
10.	Rakesh Laroia	50,000	Nil	-	-
11.	Sunil Mehta	9,000	2000	Under Process	Under Process
12.	Ten Eighty Investments	18,000	Nil	-	-
13.	Varun Agarwal	5,000	15000	Under Process	Under Process
14.	Vibha Gupta	30,000	Nil	-	-
15.	Vivek Singh	5,000	Nil	-	-
16.	WOW Investments	27,000	Nil	-	-
17.	Nandura Estates	15,000	Nil	-	-
18.	Anant Agarwal	30,000	Nil	-	-
19.	Amit R Agarwal	50,000	Nil	-	-
20.	Sushant Sachdeva	8,000	1000	Under Process	Under Process
21.	Kirti Deep	8,000	2000	Under Process	Under Process
22.	Anshu Gupta	8,000	Nil	-	-
23.	Ritesh Srivastava	8,000	Nil	-	-
24.	Anita Sethi	8,000	Nil	-	-
25.	Mithin Prakash Nimje	8,000	Nil	-	-
26.	Mayank Singh	8,000	Nil	-	-
27.	Deep Rajesh Gupta	8,000	1000	Under Process	Under Process
28.	Gopal Sharma	8,000	Nil	-	-



29.	Shalin Trivedi	8,000	Nil	-	-
30.	Rajeshwari Gupta	8,000	Nil	-	-
31.	Niagra Growth Private Limited	8,000	Nil	-	-
32.	Mansi Dua	5,000	Nil	-	-
33.	Sharat Kumar	5,000	Nil	-	-
34.	Deepak Dhanwantrai Shah (HUF)	10,000	Nil	-	-

Total Number of Warrants:

Sr. No.	Name of Proposed Allottee	Quantity	Pre-preferential holding	Lock-in details	
				From	To
1.	Uma sanjay pandey	24615	9800	28-09-2023	11-10-2024
2.	Nandini Satish pandey	24615	Nil	-	-
3.	Abheshek Satish Pandey	49231	3000	28-09-2023	11-10-2024
4.	Sarvagya sanjay pandey	24615	Nil	-	-
5.	Shruti Sanjay Pandey	24615	Nil	-	-
6.	Niranjan I sheth	22770	Nil	-	-
7.	Neeta sujit pandey	29539	Nil	-	-

- d) None of the proposed allottees belonging to promoter(s) or the promoter group is ineligible for allotment in terms of Regulations 159 of SEBI (ICDR) Regulations, 2018.
- e) The proposed issue is being made in accordance with the requirements of Chapter V of SEBI (Issue of Capital and Disclosure Requirement) Regulations, 2018, Section 42 and 62 of the Companies Act 2013 and Rule 14 of the Companies (Prospectus and Allotment of Securities) Rules, 2014 and other requirements of Companies Act, 2013. Further, the company has complied with all legal and statutory formalities and no statutory authority has restrained the company from issuing these proposed securities.
- f) The proposed preferential issue is being made in compliance with the provisions of Memorandum of Association (MoA) and Article of Association (AoA) of the company. It is further confirmed that for the proposed preferential issue, the price of the equity shares of the company has been determined in compliance with the valuation requirement as mentioned in the AoA of the company.”



Satyajit Mishra & Co.

Company Secretaries

- g) The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e. 2024-25 is more than 5% of the post issue fully diluted share capital of the issuer.

**For Satyajit Mishra & Co.
Companies Secretaries**

Satyajit Mishra

Proprietor

FCS: 5759

C P No. 4997

PR No.: 1769/2022

UDIN: F005759F000327608

Dated this May 07, 2024 at Mumbai.