



Annexure IV

To

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 74,77,364 (Seventy Four Lac Seventy Seven Thousand Three Hundred Sixty Four) Equity Shares having the face value of Rs.2/- (Rupees Two only) each on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

We, H.O. GULATI & CO. Practicing Company Secretaries, have verified the relevant records and documents of Singer India Limited (“the Company” or “the Issuer”) 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 i.e., December 16, 2022. 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) The following allottees do not hold any equity shares of the Issuer for a period starting from the Relevant Date till the date of preferential allotment

S.NO.	NAME OF THE PROPOSED ALLOTTEE(S)
1.	Rafique Malik Family Trust
2.	K Raheja Private Limited
3.	IIFL Private Equity Fund – Series 2 (a Scheme of IIFL Private Equity Fund SEBI registered Category II Alternative Investment Fund)
4.	Alpana S Dangi
5.	Boon Investment and Trading Company Private Limited
6.	Neeru Dhanpal Jhaveri

- c) The pre-preferential shareholding of each of proposed allottee(s) has been locked in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018. Further, there is no sale/ pledge of pre-preferential holding from 16th December, 2022 till 06th May, 2023. The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:



Name of Proposed Allottee (s)	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
Gauri Tandon	1202350000376671	7,00,000	16-12-2022	06-05-2023	Not Pledged	-----
PGA Securities Private Limited	120350000376574	24,50,000	16-12-2022	06-05-2023	Not Pledged	-----

(* client id/ folio no in case allottee holds the securities in physical form)

- 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. None of the proposed allottees belongs to the promoter or promoter group.~~
- 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.~~ It is further confirmed that for the proposed preferential issue, the price of the equity shares of the company has been determined as per the pricing formula prescribed under Regulation 164 / 165 of Chapter V of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.
- 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., 2022-23 is more than 5% of the post issue fully diluted share capital of the issuer.~~

OR

The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e., 2022-23 is less than 5% of the post issue fully diluted share capital of the Issuer.

For H.O. Gulati & Co.
Practicing Company Secretaries



HARI OM GULATI
Practicing Company Secretary
FCS-5462, CP No. 9337

Date: 17th December, 2022