

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 2,50,00,000 (Two Crore Fifty Lakh) equity shares to Promoter and Directors (including PAC'S) and public at an issue price of Rs. 10 for each share of face value of Rs. 10/- each of the company on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

We, M/s. Shravan A. Gupta & Associates (Membership No. ACS. 27484 & CP No. 9990), Practicing Company Secretary, have verified the relevant records and documents of Stratmont Industries Ltd. (CIN: L28100MH1984PLC339397) 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) Following allottee(s) does not hold any equity shares of the issuer for a period starting from the relevant date till the date of preferential allotment.

Sr. No.	Name of Allottees	Category
1.	M/s. Novapro Global Resources Private Limited	Promoter (PAC)
2.	Nexpact Limited	Non - Promoter (Fund)
3.	Eminence Global Fund PCC	Non - Promoter (Fund)
4.	AG Dynamic Funds Limited	Non - Promoter (Fund)

- 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 January 6, 2024 till September 30, 2024. The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

Name of Proposed Allottee	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
Mr. Vatsal Agarwal	IN301549	22,57,652	27/12/2023	30/09/2024	NA	NA

(*) client id/ folio no. in case allottee hold 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.
- 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."
- 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., 2023-24 is more than 5% of the post issue fully diluted share capital of the issuer.

***The following funds proposed (Proposed Allottees) to subscribed more than 5% of the post issue fully diluted share capital of the issuer:

Sr. No.	Name of Proposed Allottee	Category	Pre-issue holding	%	No. of equity shares proposed to be allotted	Post issue holding	%	Change in Holding (%)
1.	Nexpact Limited	Fund	Nil	Nil	25,00,000	25,00,000	8.77%	8.77%
2.	Eminence Global Fund PCC	Fund	Nil	Nil	27,50,000	27,50,000	9.65%	9.65%
3.	AG Dynamic Funds Limited	Fund	Nil	Nil	27,50,000	27,50,000	9.65%	9.65%

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., 2023-24 is less than 5% of the post issue fully diluted share capital of the issuer.~~

For Shravan A. Gupta & Associates
Practicing Company Secretary
A Peer Reviewed Firm



Shravan A. Gupta
Membership No.: ACS. 27484
CP No.: 9990
UDIN: A027484E003136843
Peer Review Certificate No.: 2140/2022

Date: December 21, 2023
Place: Mumbai