



A Peer Reviewed Firm

DIPIKA SONI & ASSOCIATES

B.Com., Company Secretaries

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Annexure IV

Confirmation by the Practicing Company Secretary

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

Date: 05.08.2025

Dear Sir,

Sub: Application for “In-Principal approval” for reconfirming the issue and allotment of (i) 29,50,000 Equity Shares of Rs. 10/- each and (ii) 55,00,000 convertible warrants to be issued on a preferential basis AND (iii) fresh issue of 1,05,50,000 convertible warrants of Rs. 10/- each pursuant to Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

I, Dipika Soni, proprietor of Dipika Soni & Associates, Practicing Company Secretary, have verified the relevant records and documents of M/s Umiya Tubes 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 allottees 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) Allottees mentioned in **Table 1**, annexed to this certificate, do not hold any equity shares of the issuer for a period starting from the relevant date till the date of issuance of this certificate:

- 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 09.07.2025 being Relevant Date till 05.08.2025 being the date of certificate. The details of allottee-wise pre-preferential shareholding and lock-in thereon are given hereunder in **Table 2**, annexed to this certificate.
- 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. 2024 25 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. _____ is less than 5% of the post issue fully diluted share capital of the issuer.~~

**For Dipika Soni & Associates
Practicing Company Secretary**

D.P. Soni

**Dipika Soni
FCS No. 11734
COP No. 25331
UDIN: F011734G000938946**



**Date: 05.08.2025
Place: Ahmedabad**

Table 1

(A) List of allottees who do not hold any equity shares of the issuer company for a period starting from the relevant date till the date of issuance of this certificate: (reconfirming issue and allotment of 29,50,000 Equity Shares of Rs. 10/-each)

Sr. No.	Name of the proposed allottees	PAN
1	Mathurdas Ramniklal Babariya	ALMPB3932D
2	Nikhil Hareshbhai Savaliya	GAWPS9919G

(B) List of allottees who do not hold any equity shares of the issuer company for a period starting from the relevant date till the date of issuance of this certificate: (reconfirming issue and allotment of 55,00,000 convertible warrants of Rs. 10/-each)

Sr. No.	Name of the proposed allottees	PAN
1	Bhikhabhai Limbabhai Baldha	CDSPB3222H
2	Madhuri Divyesh Savaliya	DCCPS0007L
3	Piyush Mansukhbhai Savalia	CPOPS6615C
4	Sudhir Amrutlal Vekariya	ADGPV6956K
5	Naman Madhavjibhai Viradiya	BEKPV9701A

(C) List of allottees who do not hold any equity shares of the issuer company for a period starting from the relevant date till the date of issuance of this certificate: (fresh issue of 1,05,50,000 convertible warrants of Rs. 10/-each).

Sr. No	Name of the proposed allottees	PAN
1	Arix Capital Limited	AASCA1393B
2	Froid Finance and Investments Pvt Ltd	AAACF5844L
3	Daize Weal Thedge Advisors	AAYFD4221E
4	Shivaan Capitalnest Advisors	AFQFS7393D
5	Jigish Maheshbhai Lakhani	APEPL9664E
6	Priti Jigish Lakhani	DICPP7993C
7	Maheshbhai Hemrajbhai Lakhani	AGHPP7781J
8	Manjulaben Mavjibhai Lakhani	ACJPL7109E
9	Harsukhbhai H Lakhani	ABUPL9989L
10	Dhairya Jayeshbhai Thumar	CWIPT9463N
11	Nishra Abhaykumar Thumar	AWGPT3088D
12	Gopeshraiji Balkrishnalalji Goswami	ABGPG4702Q
13	Goswami Mukundraiji Balkrishnalalji	ABGPG4701P
14	Ranjana Kanda	ABGPG7383Q
15	Rajnishkumar Gopalbhai Amipara	AJDPA2211K
16	Nidhiben Rajnishkumar Amipara	BOTPA7255R
17	Bakaraniya Manglaben Sudhirbhai	PDYPS0603B

DIPIKA SONI & ASSOCIATES
Company Secretaries

18	Sanjaybhai Amrutlal Parmar (Huf)	ABGHS5179F
19	Ratanben Jain	AADPJ4884C
20	Subhash Chand Gupta	AAGPG6254N
21	Divyansh Rungta	BRIPR0585B
22	Shantilal Dwarkadas Patel-Huf	ABMHS8993K
23	Gitaben Atulbhai Vasoya	BYLPV8725K
24	Sojitra Prabhaben Savjibhai	JTNPS0366A

For Dipika Soni & Associates
Practicing Company Secretary

D.P. Soni

Dipika Soni
FCS No. 11734
COP No. 25331
UDIN: F011734G000938946



Date: 05.08.2025
Place: Ahmedabad

Table 2

(A) List of allottees who hold equity shares of the issuer company for a period starting from the relevant date till the date of issuance of this certificate: (reconfirming issue and allotment of 29,50,000 Equity Shares of Rs. 10/-each).

Name of Proposed Allottees	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
Kajal Gopal Baldha	1208160151219549	50,750	22.10.24	28.02.26	N. A.	N. A.
Divyeshkumar Mansukhbhai Savaliya	1208160039055292	48,623	22.10.24	28.02.26	N. A.	N. A.

(B) List of allottees who hold equity shares of the issuer company for a period starting from the relevant date till the date of issuance of this certificate: (reconfirming issue and allotment of 55,00,000 convertible warrants of Rs. 10/-each).

Name of Proposed Allottees	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
Punitbhai Bavanjibhai Lakkad	1208160036839178	17,129	22.10.24	28.02.26	N. A.	N. A.
Khilan Hareshbhai Savaliya	1203320031901952	352	30.07.25	28.02.26	N. A.	N. A.
Khilan Hareshbhai Savaliya	1208160100012504	5	30.07.25	28.02.26	N. A.	N. A.

DIPIKA SONI & ASSOCIATES
Company Secretaries

(C) List of allottees who hold equity shares of the issuer company for a period starting from the relevant date till the date of issuance of this certificate: (fresh issue of 1,05,50,000 convertible warrants of Rs. 10/-each).

Name of Proposed Allottees	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
Emily Bosco Menezes	IN301151-21928626	75000	01.08.25	28.02.26	N. A.	N. A.

For Dipika Soni & Associates
Practicing Company Secretary

D.P. Soni

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