



**Annexure IV**

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

Dear Sir,

**Sub: Application for “In-principle approval” prior to issue and allotment of 7,23,578 Equity Shares of Rs. 10 each at cash (with a premium of Rs. 1,346.40 each) on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 (“SEBI Listing Regulation”).**

We, TNT & Associates, Practicing Company Secretaries, have verified the relevant records and documents of **Bharat Parenterals Limited** (“the Company”) with respect to the its proposed preferential issue as per Chapter V of SEBI (Issue of Capital and Disclosure Requirement) Regulations, 2018 (“SEBI ICDR Regulation”) as amended from time to time and based upon the information available to us we hereby certify that:

- a) None of the proposed allottee(s) 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) Mr. Praduman Singh and Amrutlal Narandas Ganatra HUF, amongst the proposed allottees, as mentioned in annexure “A”, hold 1 and 607 equity shares respectively of the issuer for a period starting from the relevant date till the 24.04.2024 or prior to intimation of board meeting.
- 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 19th April, 2023 (Relevant Date) till (90 days from Trading approval (Reg 167)). The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder: **Not Applicable, as the proposed allottees are not holding any shares in the Company up to the Relevant Date.**



- 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. **Not Applicable as none of the proposed allottees belong to promoter(s) or the 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 the 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.

FOR, TNT & ASSOCIATES

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**NIRAJ TRIVEDI**

**PARTNER**

**MEMBERSHIP NO.3844**

**PEER REVIEW NO.: 3209/2023**

**UDIN: F003844F000393970**

**DATE: 18<sup>th</sup> MAY, 2024**

**PLACE: VADODARA**

**ANNEXURE-A**

SR NO.	NAME OF THE COMPANY	TYPE OF ENTITY	NAME OF THE NATURAL PERSONS, WHO ARE ULTIMATE BENEFICIAL OWNERS OF THE SHARES	PAN NO	**NO. OF EQUITY SHARES	% OF HOLDING POST ALLOTMENT
1	NEO APEX SHARE BROKING SERVICES LLP	LLP	Partners of LLP- 1.Hardik Mahendrabhai Shah 2.Bhavin Yashodhan Mehta	AAUFN3765H	88469.00	1.35%
2	AJEET JALAN	Individual	Ajeet Jalan	ACHPJ1906D	29489.00	0.45%
3	AMRUTLAL NARANDAS GANATRA HUF	HUF	Karta of HUF	AABHA4652D	7372.00	0.11%
4	Rajiv Agarwal	Individual	Rajiv Agarwal	AACPA27545E	7372.00	0.11%
5	Ashish Kacholia	Individual	Ashish Kacholia	AADPK0757F	129018.00	1.97%
6	Himalaya Finance & Investment Co	Partnership Firm	Partners of Firm- 1. Madhulika Agarwal 2. Om prakash Agarwal 3. Bishwanath Agrawal 4. Shyam Sundar Agrawal 5. Sudarshan Agarwal 6. Suresh Kumar Agrawal	AACFH1077Q	129018.00	1.97%
7	Samedh Trinity Partners	Partnership Firm	Partners of Firm-	AEKFS7313C	2211.00	0.03%

			1. Ankit Thakkar 2. Devansh Vajani 3. Jinisha Chheda 4. Bhavi Vajani			
8	Anupam Agarwal	Individual	Anupam Agarwal	AZUPA7567K	1843.00	0.03%
9	Mitul Mehta	Individual	Mitul Mehta	AFFPM8829K	1474.00	0.02%
10	Heetaben Amar Maurya	Individual	Heetaben Amar Maurya	ARKPM2442B	1105.00	0.02%
11	Incipience Dealers LLP	LLP	Partners of LLP- a. Pooja Jhunjhunwala b. Shivam Jhunjhunwala	AAGFI5737E	1474.00	0.02%
12	Reshma Kukreja	Individual	Reshma Kukreja	AJFPK8842G	1105.00	0.02%
13	Sarita Dayma	Individual	Sarita Dayma	AFOPD9276J	2064.00	0.03%
14	CHARU SEHGAL	Individual	CHARU SEHGAL	AFGPS9598L	7372.00	0.11%
15	Kaushal Nathani	Individual	Kaushal Nathani	CTFPN6203A	2211.00	0.03%
16	Shantilal B Rawal	Individual	Shantilal B Rawal	AAAPR8089C	1474.00	0.02%
17	KARAN ARORA	Individual	KARAN ARORA	AFWPA5527M	1474.00	0.02%
18	ZARANA ARORA	Individual	ZARANA ARORA	AAEPS6891D	1474.00	0.02%
19	DHIRAJLAL SHAH	Individual	DHIRAJLAL SHAH	AAEPS6890C	1474.00	0.02%
20	KETKI D. SHAH	Individual	KETKI D. SHAH	ASYPS5803P	1474.00	0.02%
21	Kalpana Tushar Vora	Individual	Kalpana Tushar Vora	AACPV9319H	1843.00	0.03%
22	Mrs ELLA MITAL- First holder & (JOINT A/C WITH SHEKHAR MITAL)	INDIVIDUAL	Mrs. Ella Mital	AKWPM4382K	7372.00	0.11%

23	Sejal Arunkumar Shah	Individual	Sejal Arunkumar Shah	BBWPS5943L	1843.00	0.03%
24	METAROLL S ISPAT PRIVATE LIMITED	Private Limited	Shareholders of the company being private limited company where shareholders are more than 20 so name of shareholders cannot be mentioned here	AADCM3474C	11058.00	0.17%
25	VIRAL KISHORKU MAR SHAH	Individual	VIRAL KISHORKUM AR SHAH	BIGPS3953M	1843.00	0.03%
26	Overseas Health Care Private Limited	Corporate	a. Mr. D. P. Soni b. Mrs. Rekha Soni c. Mr. Baldev Singh d. Mr. Kuldeep Singh e. Ms. Ranjit Singh	AAACO1558J	22117.00	0.34%
27	RAHUL SONI	Individual	RAHUL SONI	AXDPS3498Q	7372.00	0.11%
28	Abhimanyu Sofat	Individual	Abhimanyu Sofat	AOBPS6456F	7372.00	0.11%
29	Hanuman Shrikrishna Harlalka	Individual	Hanuman Shrikrishna Harlalka	ABCPH5876Q	1990.00	0.03%
30	UMA Sethia	Individual	UMA Sethia	AJQPS6575D	2506.00	0.04%
31	Sanjiv Navinchandra Shah	INDIVIDUAL	Sanjiv Navinchandra Shah	AAESP8527Q	7372.00	0.11%
32	Viranchi Mehta	INDIVIDUAL	Viranchi Mehta	BCFPM3641B	7372.00	0.11%
33	Girish Mehta	INDIVIDUAL	Girish Mehta	AADPM3942Q	7372.00	0.11%
34	Namrata Dhruvesh Sanghvi	IND	Namrata Dhruvesh Sanghvi	BCPPS1069H	5971.00	0.09%
35	Anil H Sanghvi	IND	Anil H Sanghvi	ALHPS8696J	5971.00	0.09%
36	Ural Doshi	IND	Ural Doshi	ALHPD6868M	1843.00	0.03%

37	Mansukhlal Kamdar NRE	NRI - NRE	Mansukhlal Kamdar NRE	AMAPK4613M	1843.00	0.03%
38	Bharat Doshi NRE	NRI - NRE	Bharat Doshi NRE	AJSPD4849F	1843.00	0.03%
39	Ritesh Dugar NRE	NRI - NRE	Ritesh Dugar NRE	AALPD6675K	1843.00	0.03%
40	Rita Rajendra Shah	IND	Rita Rajendra Shah	AAQPS0120D	2211.00	0.03%
41	Everlon Financials Ltd	Corporate	Shareholders of the company being listed company and listed with BSE where shareholders are more than 1000 so name of shareholders cannot be mentioned here	AAACE0860H	2580.00	0.04%
42	Rakesh Chandra NRO	NRI - NRO	Rakesh Chandra NRO	AAVPC4406B	1843.00	0.03%
43	Anjali Dhiteh Shah	IND	Anjali Dhiteh Shah	AAKPS2429K	1843.00	0.03%
44	Jasmina Samir Shah	IND	Jasmina Samir Shah	ALYPS0093G	1474.00	0.02%
45	Manan Thakkar	Individual	Manan Thakkar	AGBPT3351Q	5971.00	0.09%
46	Lalit C Shah	Individual	Lalit C Shah	AADPS2044R	1843.00	0.03%
47	Harshil Kothari NRE	NRI - NRE	Harshil Kothari NRE	ADRPK3254G	7372.00	0.11%
48	Ishita Yatin Mota	IND	Ishita Yatin Mota	BUZPS3251F	1843.00	0.03%
49	Ashok Sanghavi	IND	Ashok Sanghavi	AAGPS3837D	1843.00	0.03%
50	Ruchita Ganatra	individual	Ruchita ganatra	ALLPG6201F	2432.00	0.04%
51	Bhagwan Singh	Individual	Bhagwan Singh	CHEPS0730G	11058.00	0.17%
52	Vipin Kumar Vindal	Individual	Vipin Kumar Vindal	AEUPV2817A	14744.00	0.23%
53	BRJ Resources pvt ltd	Company	a. Sachin Kumar Bhansali b. Pravina Bhansali	AAJCB4459L	7372.00	0.11%

54	Bajrang Omprakash Bafna HUF	Individual HUF	Karta of HUF	AAKHB9400R	1843.00	0.03%
55	Vashuki India Trust	Company	Beneficiary of Trust	AADTV5112F	36862.00	0.56%
56	Bharat Asan Binyani	Individual	Bharat Asan Binyani	AFBPP876H	1843.00	0.03%
57	Praduman Singh	Individual	Praduman Singh	AZHPS2608C	7372.00	0.11%
58	Gunchandra Chunilal Mehta HUF	Individual HUF	Karta of HUF	AABHM0539H	3686.00	0.06%
59	Ankit Babel	Individual	Ankit Babel	AJAPB5951E	1843.00	0.03%
60	HARSIMRIT KAUR	Individual	HARSIMRIT KAUR	AJHPK1859M	7003.00	0.11%
61	iOCFO CONSULTING PRIVATE LIMITED	Private Limited	a. Shashikant Khemani b. Shweta Khemani	AADCI5177J	1474.00	0.02%
62	SHAKTI FINVEST PARTNERS	PARTNERSHIP FIRMS	Kavita Atha	ADIFS9624B	18431.00	0.28%
63	JAI AMBE PARTNERS	PARTNERSHIP FIRMS	Khushboo Atha	AANFJ0608C	18431.00	0.28%
64	Nipun Arora	Individual	Nipun Arora	AHXP5331J	5160.00	0.08%
65	Himani Shah	Individual	Himani Shah	AKPPD8717Q	1843.00	0.03%
66	Arun Jayantilal Shah	Individual	Arun Jayantilal Shah	AAEPS2190K	1843.00	0.03%
67	Hina Jayesh Parekh	Individual	Hina Jayesh Parekh	AHPPP6978A	14744.00	0.23%
68	Adhiraj Patel	Individual	Adhiraj Patel	AYWPP6214F	3686.00	0.06%
69	Rahul D Khivasara	Individual	Rahul D Khivasara	AMMPK6834A	3686.00	0.06%
70	Krish Kothari	Individual	Krish Kothari	BCAPK8698B	1843.00	0.03%
71	Alok Kothari	Individual	Alok Kothari	AADPK9263C	1843.00	0.03%