



AKSHAY R. BIRLA AND ASSOCIATES

Practicing Company Secretaries

Office Add: Off. No. 23, Third Floor,
Mansing Market, Jalgaon - 425001 (MH)

Cell: +91-9028110641, 9067890641

Annexure IV

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

The Chief General Manager
Listing Operation,
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Mumbai - 400051

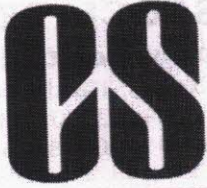
Dear Sir,

Sub: Application for "In-principle approval" prior to issue and allotment of 1,68,75,000 Equity Shares and 72,00,000 Warrants Convertible into Equity Shares on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

I, **Mr. Akshay R Birla, Practicing Company Secretary** have verified the relevant records and documents of **ATAL REALTECH LIMITED** with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

- 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.
- 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.

| Sr. No. | Name of Allottee |
|---------|---|
| 1 | Sarthak Goyal |
| 2 | Dhiraj Jain |
| 3 | Maanor Investments Private Limited |
| 4 | Seema Jain |
| 5 | Sharbhang Commercial Company Private Limited. |
| 6 | Optume Investments Private Limited |
| 7 | Escorp Asset Management Limited |
| 8 | Ashokkumar Vasantlal Shah |
| 9 | Hemant Hasraj Maru |



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| | |
|----|---|
| 10 | Sunil Veljibhai Saiya |
| 11 | Piyush Jadavji Vora |
| 12 | Naina Prasad Vaidya |
| 13 | Kajal Mahindra Shah |
| 14 | Niranjan Ratanshi Sachade |
| 15 | Ketan K Shah |
| 16 | Vinod Dhudalal Shah |
| 17 | Saurav Raidani |
| 18 | Pratik Hasmukh Shah |
| 19 | Pradip Ratanchand Surana |
| 20 | Cullinan Opportunities Incorporated Vcc Sub-Fund 1 |
| 21 | Paresh Dineshlal Shah |
| 22 | Gautam Nowlakha |
| 23 | Zeta Global Fund (OEIC) PCCLimited – Zeta Series B Fund PC |
| 24 | Harsha Bharat Sheth |
| 25 | DS Holdings |
| 26 | Vinod Sethi |
| 27 | Intellectual Partners |

- 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 the proposed Allottee | Number of Equity Shares | Pre-preferential holding | Lock-in details |
|---------|---|-------------------------|--------------------------|-----------------|
| 1. | Sarthak Goyal | 31,25,000 | Nil | NA |
| 2. | Dhiraj Jain | 13,00,000 | Nil | NA |
| 3. | Maanor Investments Private Limited | 13,00,000 | Nil | NA |
| 4. | Seema Jain | 13,00,000 | Nil | NA |
| 5. | Sharbhang Commercial Company Private Limited. | 13,00,000 | Nil | NA |
| 6. | Optume Investments Private Limited | 8,62,500 | Nil | NA |
| 7. | Escorp Asset Management | 6,25,000 | Nil | NA |



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| | Limited | | | |
|-----|--|--------------------|-----|----|
| 8. | Ashokkumar Vasantlal Shah | 1,87,500 | Nil | NA |
| 9. | Hemant Hansraj Maru | 1,87,500 | Nil | NA |
| 10. | Sunil Veljibhai Saiya | 1,87,500 | Nil | NA |
| 11. | Piyush Jadavji Vora | 1,87,500 | Nil | NA |
| 12. | Naina Prasad Vaidya | 1,87,500 | Nil | NA |
| 13. | Kajal Mahindra Shah | 1,87,500 | Nil | NA |
| 14. | Niranjan Ratanshi Sachade | 1,87,500 | Nil | NA |
| 15. | Ketan K Shah | 1,56,250 | Nil | NA |
| 16. | Vinod Dhudalal Shah | 6,25,000 | Nil | NA |
| 17. | Saurav Raidhani | 3,12,500 | Nil | NA |
| 18. | Pratik Hasmukh Shah | 3,12,500 | Nil | NA |
| 19. | Pradip Ratanchand Surana | 1,56,250 | Nil | NA |
| 20. | Cullinan Opprts Fund VCC- Cullinan Opportunities Incorporated VCC Sub Fund 1 | 3,12,500 | Nil | NA |
| 21. | Paresh Dineshlal Shah | 1,56,250 | Nil | NA |
| 22. | Gautam Nowlakra | 1,56,250 | Nil | NA |
| 23. | Zeta Global Funds (Oeic) PCC Limited-Zeta Series B Fund PC | 18,75,000 | Nil | NA |
| 24. | Harsha Bharat Sheth | 1,25,000 | Nil | NA |
| 25. | DS Holdings | 3,12,000 | Nil | NA |
| 26. | Vinod Sethi | 6,25,000 | Nil | NA |
| 27. | Intellectual Partners | 6,25,000 | Nil | NA |
| | Total | 1,68,75,000 | | - |

Total Number of Warrants:

| Sr. No | Name of the proposed Allottee | Number of Equity Shares | Pre-issue Holding | Lock-in details |
|--------|-------------------------------|-------------------------|-------------------|-----------------|
| 1. | Vijyagopal Parasram Atal | 72,00,000 | 3,00,93,000 | Under Process |
| | Total | 72,00,000 | | |

- 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.



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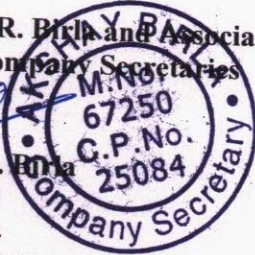
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- e) The proposed issue is being made in accordance with the requirements of Chapter V of SEBI (Issue of Capital and Disclosure Requirement) Regulations, 2018, Section 42 and 62 of the Companies Act 2013 and Rule 14 of the Companies (Prospectus and 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. 2025-26 is more than 5% of the post issue fully diluted share capital of the issuer.

For, Akshay R. Birla and Associates
Practicing Company Secretaries

Akshay R. Birla
CS Akshay R. Birla
M. No.: 67250
CP No.: 25084
PR No.: 5938/2024



Place: Jalgaon

Date: 12/06/2025