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Email : csmanishpatel@gmail.commailmanishpatel@yahoo.co.in**MANISH R. PATEL**Company Secretary & Trade Mark Agent
M.Com, DTP, DLP, ACS105, 1st Floor, Meghani Tower, Cinema Road, Delhi Gate, Surat – 395 003, Gujarat, Tel: 0261 – 2601717, 3911717

Annexure IV

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

Dear Sir/Madam,

Sub: Application for “In-principle approval” prior to issue and allotment of 33,33,000 (Thirty Three Lakh Thirty Three Thousand) Fully Convertible Equity Warrants on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

Pursuant to remarks made by the BSE on 09-03-2023 on in-principal approval application, I, Manish R. Patel, Practising Company Secretary (COP No. 9360), have verified the relevant records and documents of Nanavati Ventures Limited with respect to the proposed preferential issue by the Company as per Chapter V of the SEBI (ICDR) Regulations, 2018 and certify that:

- None of the proposed allottee(s) except Monikaben Pratikkumar Valand, have sold any equity shares of the Company during the 90 trading days preceding the relevant date. Further, none of entities in the promoter and promoter group entities have sold any equity share of the company during the 90 trading days preceding the relevant date.
- Except following proposed 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 proposed allottee(s)
1	Kashmira Hemantkumar Nanavati
2	Monikaben Pratikkumar Valand

- The pre-preferential shareholding of each of the proposed Allottee(s) has been locked-in, in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018. Further, there is no sale/pledge of pre-preferential holding from 22nd February, 2023 till lock-in date. The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

Name of Proposed Allottees	DP ID/Client ID *	Pre-preferential holding	Lock-in details	
			From	To
Kashmira Hemantkumar Nanavati	1208020000048084	329600	25/04/2022	31/05/2025
Kashmira Hemantkumar Nanavati	1208020000048084	529500	25/04/2022	14/08/2023#
Chhotelal Chaudhari HUF	1204150001114518	NIL	N.A.	N.A.
Chhotelal Chaudhari	1204150000724729	NIL	N.A.	N.A.
Manjuben Jayantibhai Vagdoda	1203510000301140	NIL	N.A.	N.A.
Ashaben Dharamshibhai Vala	1204150001318339	NIL	N.A.	N.A.
Pinkeshkumar Rajnibhai Patel HUF	1207170000422066	NIL	N.A.	N.A.
Chandubhai Lallubhai Nai	1203510000301252	NIL	N.A.	N.A.
Taraben Chandubhai Nayi	1203510000301155	NIL	N.A.	N.A.
Dilip Narsinhbhai Patel	1208840000109048	NIL	N.A.	N.A.



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Parshottambhai Zaverbhai Patel	1208840000016827	NIL	N.A.	N.A.
Demaben Khagaji Solanki	1207170000422733	NIL	N.A.	N.A.
Kantaben Narshibhai Palaja	1208840000016846	NIL	N.A.	N.A.
Monikaben Pratikkumar Valand	1208840000109033	NIL	N.A.	N.A.
Kirtibhai Chamanbhai Adhgama	1208840000001151	NIL	N.A.	N.A.
Maheshji Chothaji Thakor	1208840000111152	NIL	N.A.	N.A.
Urmilaben Nagjibhai Gohil	1204150001183614	NIL	N.A.	N.A.
Kantibhai Raychandbhai Palaja	1208840000016865	NIL	N.A.	N.A.

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

- (#) 5,29,500 Equity shares of Ms. Kashmira Hemantkumar Nanavati were already under lock in from 25/04/2022 till 31/05/2023 in terms of Regulation 238(b) and 239 of the SEBI (ICDR) Regulations, 2018. The Company has applied to the respective Depository for the extension of Lock-in of those shares till 14/08/2023 and the same is approved.
- 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 the SEBI (Issue of Capital and Disclosure Requirement) Regulations, 2018, Section 42 and Section 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 AOA of the Company does not provide any method for determination of valuation for the proposed Preferential Issue.
- 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.

Date: 14/03/2023

Place: Surat



MANISH R. PATEL

Company Secretary in Practice

ACS No.: 19885

COP No.: 9360

PRCN: 929/2020

ICSI Unique Code: I2010GJ763400

ICSI UDIN: A019885D003273025