

# A. K. LABH

FCS, ACMA (ICAI), MBA, M.Com., ACSI (Lond)  
DIM, DHRD, PGHDSM, DIRPM  
Practising Company Secretary



# A. K. LABH & Co.

**Company Secretaries**

40, Weston Street, 3rd Floor, Kolkata - 700 013

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Dated : 31<sup>st</sup> December, 2024

To

The Board of Directors,  
Regaal Resources Limited  
6<sup>th</sup> Floor, D2/2, Block-EP & GP,  
Sector -V, Kolkata - 700091,  
West Bengal, India

Re: Proposed initial public offering of equity shares (Equity Shares) by Regaal Resources Limited (Company) through a fresh issue of Equity Shares and an offer for sale of the Equity Shares by Selling Shareholders (Offer).

*Dear Sir(s)/Madam,*

With reference to your mandate letter dated 1<sup>st</sup> November, 2024, We, **A. K. LABH & Co., Company Secretaries**, hereby accord our no-objection and our consent to be named as an "expert" as defined under Section 2(38) of the Companies Act, 2013 as amended, to our report titled "**Certificate in relation to Corporate Records of the Company**" dated 31<sup>st</sup> December, 2024 (the "**Report**"), as annexed as **Annexure A** hereof and its contents or any extract thereof and all the information in relation to us appearing therein, about us, being included in the draft red herring prospectus (**DRHP**), red herring prospectus (**RHP**) and the prospectus (**Prospectus**) which the Company intends to file, with the Securities and Exchange Board of India (**SEBI**), Registrar of Companies, West Bengal at Kolkata (**RoC**) and the stock exchanges where the Equity Shares are proposed to be listed (**Stock Exchanges**), as applicable and any other documents in relation to the Offer including publicity materials, presentations or press releases prepared by the Company or its advisers (collectively, the **Offer Documents**).

This letter does not impose any obligation on the Company to include in any Offer Documents all or any part of the information with respect to which consent for disclosure is being granted pursuant to this letter.

We confirm that we do not have any relationship with the Company, its directors, promoters or its key managerial personnel. Further, we authorize you to include the Report and this letter as a "*Material Contract and Document for Inspection*" in the Offer Documents, as required and make the Report and this letter available for inspection in accordance with applicable law.



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We confirm that we are not, and have not been, engaged or interested in the formation or promotion or management of the Company.

We represent that our execution, delivery and performance of this consent has been duly authorised by all necessary actions (corporate or otherwise).

We agree to keep the information regarding the Offer strictly confidential.

We confirm that we will immediately communicate any changes, if comes or reported to our knowledge and information, in writing in the above information to the book running lead manager to the Offer (BRLMs) until the date when the Equity Shares commence trading on the Stock Exchanges. In the absence of any such communication from us, BRLMs and the legal counsel to the Offer, can assume that there is no change to the above information until the Equity Shares commence trading on the Stock Exchanges pursuant to the Offer.

This consent letter is for information and for inclusion (in part or full) in the Offer Documents or any other Offer-related material, and may be relied upon by the Company, BRLMs and the legal counsel appointed in relation to the Offer and may be uploaded on their respective websites.

We consent to this certificate and the documents annexed to this certificate to be uploaded on the websites of the Company and the BRLMs and on the website, repository and, or, the database of the Stock Exchanges

All capitalized terms used herein and not specifically defined shall have the same meaning as ascribed to them in the Offer Documents, as the case may be.

Yours faithfully,

For A. K. LABH & Co.  
*Company Secretaries*

(CS Atul Kumar Labh)  
*Practicing Company Secretary*





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Website : [www.aklabh.com](http://www.aklabh.com)

Cc:

**1. Pantomath Capital Advisors Private Limited**

Pantomath Nucleus House,  
Saki Vihar Road,  
Andheri (East), Mumbai – 400 072,  
Maharashtra, India

**2. Sumedha Fiscal Services Limited**

6A Geetanjali, 8B Middleton Street,  
Kolkata – 70 0071,  
West Bengal, India.

**3. Legal Counsel to the Offer**

**Bharucha & Partners**

13<sup>th</sup> Floor, Free Press House,  
Free Press Journal Marg,  
Nariman Point,  
Mumbai – 400 021

