

Certificate on details of price of specified securities and weighted average cost to promoters, promoter group, Selling Shareholder and others for acquisition of shares

To,

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

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

and

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

(Pantomath Capital Advisors Private Limited and Sumedha Fiscal Services Limited are hereinafter referred to as the **BRLMs** or **Book Running Lead Managers**)

Sub: 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 Sirs,

We, **Singhi & Co. , Chartered Accountants**, the statutory auditors of the Company, have been informed that the Company has filed the Draft Red Herring Prospectus with respect to the Offer (the "DRHP") with the Securities and Exchange Board of India ("SEBI"), BSE Limited and National Stock Exchange of India Limited (collectively, the "Stock Exchanges") in accordance with the provisions of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("SEBI ICDR Regulations") and applicable laws, and proposes to file (i) Red Herring Prospectus with the SEBI, the Stock Exchanges and the Registrar of Companies, West Bengal at Kolkata ("Registrar of Companies" and such Red Herring Prospectus, the "RHP"); (ii) Prospectus with the SEBI, the Stock Exchanges and the Registrar of Companies (the "Prospectus"); and (iii) any other documents or materials to be issued in relation to the Offer (collectively with the DRHP, RHP and Prospectus, the "Offer Documents").

1. In terms of our engagement letter dated August 5, 2024, in relation to the Offer We have received a request from the Company to verify and certify the average cost at which Equity Shares were allotted/purchased to/by the Promoter(s) and Promoter Group (as defined in the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (**SEBI ICDR Regulations**) of the Company.



Management Responsibility

2. The preparation of the details is the responsibility of the management of the Company. The management is also responsible for the maintenance of proper books of accounts and such other relevant records as prescribed by applicable laws, which includes collecting, collating, and validating data and designing, implementing and monitoring of internal controls relevant for the computation of above-mentioned annexure.
3. The Management is also responsible for providing us the documents as would be required by us for certifying the requirement as per paragraph 2 above.

Auditor's Responsibility

4. We are responsible to certify the matters as stated in paragraph 2 above.
5. We conducted our examination of the Statement in accordance with the Guidance Note on Reports or Certificates for Special Purposes issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.
6. We have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, Quality Control for Firms that perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements issued by the Institute of Chartered Accountants of India.
7. Based on the information and explanation and on review of the share transfer forms, share allotment register, minutes of the meetings of the Board of Directors of the Company, minutes of annual general meetings and extra-ordinary general meetings of the Company, relevant statutory registers, annual return and other documents and accounts that we considered relevant and necessary, we hereby certify the following:

Average cost of acquisition of Equity Shares for the Promoters

The average cost of acquisition per Equity Share for our Promoters is:

Sr. No	Name of the Promoters	No. of Equity Shares held	Average cost of acquisition per Equity Share (in ₹) *
1.	Anil Kishorepuria**	28,276,536	6.66
2.	Shruti Kishorepuria**	30,441,624	6.69
3.	Karan Kishorepuria	960,000	0.00
4.	BFL Private Limited**	14,674,650	37.89

** Also, Selling Shareholders

Average cost of acquisition of Equity Shares for the Selling Shareholder

Sr. No	Name of the Selling Shareholder	No. of Equity Shares held	Average cost of acquisition per Equity Share (in ₹) *
1.	SRM Private Limited	71,98,130	19.24

The number of equity shares acquired and the weighted average price of acquisition per equity share is calculated after giving effect of bonus and split.

The details of the workings for the cost of acquisition per Equity Share for Promoters and Selling Shareholders are attached herewith as **Annexure A**.



Singhi & Co.

Chartered Accountants

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Details of price at which Equity Shares were acquired by Promoter, the members of our Promoter Group, Selling Shareholder and Shareholders with right to nominate Directors or other rights in the last 3 years preceding the date of Offer Documents.

Sr. No.	Name	Date of Acquisition	Number of Equity Shares Acquired	Face Value (in ₹)	Acquisition price per Equity Share
Promoters					
1.	Anil Kishorepuria**	November 08, 2024	21,207,402	5	Nil
2.	Shruti Kishorepuria**	November 8, 2024	22,831,218	5	Nil
3.	BFL Private Limited**	November 18, 2024	4,545,450	5	110.00
		November 8, 2024	7,596,900	5	Nil
4.	Karan Kishorepuria	November 8, 2024	7,20,000	5	Nil
Promoter Group					
1.	SRM Private Limited**	November 18, 2024	909,090	5	110.00
		November 8, 2024	4,716,780	5	Nil
2.	Raj Kumar Kishorepuria (HUF)	November 8, 2024	116,250	5	Nil
3.	Raj Kumar Kishorepuria	November 8, 2024	52,500	5	Nil

** Also, Selling Shareholder

Weighted average cost of acquisition of all Equity Shares

Period	Weighted Average Cost of Acquisition (in ₹) *	Cap Price is 'X' times the Weighted Average Cost of Acquisition	Range of acquisition price: Lowest price – highest price* (in ₹)
Last one year preceding the date of this Offer Documents	9.53	[•]	0-110
Last 18 months preceding the date of this Offer Documents	9.53	[•]	0-110
Last three years preceding the date of this Offer Documents	9.53	[•]	0-110

Weighted average cost of acquisition of all Equity Shares transacted in the 3 years, 18 months and 1 year preceding the date of Offer Documents are attached herewith as **Annexure B**.



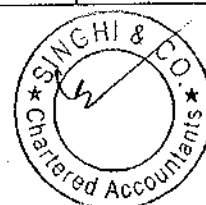
Annexure A

Average Cost of Acquisition Per Equity Share for Promoters & Selling Shareholders

1. Anil Kishorepuria**

(in ₹ except number of shares and cost per shares)

Date of Acquisition	No. of Equity Shares	Face Value (₹)	Cost per Equity Share (₹)	Total Cost (in ₹)	Nature of transaction	Cumulative No. of Equity Shares	Cumulative amount (in ₹)
07-12-2015	12,500	10	40	5,00,000	Allotment	12,500	5,00,000
14-06-2016	(25)	10	40	(1,000)	Transfer	12,475	4,99,000
14-06-2016	(25)	10	40	(1,000)	Transfer	12,450	4,98,000
14-06-2016	(25)	10	40	(1,000)	Transfer	12,425	4,97,000
14-06-2016	(25)	10	40	(1,000)	Transfer	12,400	4,96,000
11-09-2017	87,500	10	40	35,00,000	Allotment	99,900	39,96,000
27-03-2018	1,00,000	10	40	40,00,000	Allotment	199,900	79,96,000
04-09-2018	7,500	10	40	3,00,000	Transfer	207,400	82,96,000
05-12-2019	28,125	10	-	-	Gift	235,525	82,96,000
05-12-2019	7,500	10	-	-	Gift	243,025	82,96,000
01-04-2020	5,000	10	51	2,55,000	Transfer	248,025	85,51,000
01-04-2020	10,000	10	51	5,10,000	Transfer	258,025	90,61,000
01-04-2020	7,12,500	10	51	3,63,37,500	Transfer	970,525	4,53,98,500
01-04-2020	16,000	10	51	8,16,000	Transfer	986,525	4,62,14,500
23-11-2020	3,45,000	10	51	1,75,95,000	Allotment	1,331,525	6,38,09,500
20-01-2021	5,60,000	10	51	2,85,60,000	Allotment	1,891,525	9,23,69,500
11-03-2021	3,35,000	10	51	1,70,85,000	Allotment	2,226,525	10,94,54,500
18-03-2021	3,25,500	10	51	1,66,00,500	Transfer	2,552,025	12,60,55,000
29-03-2022	16,875	10	64	10,80,000	Transfer	2568900	12,71,35,000
29-03-2022	10,000	10	-	-	Will	2578900	12,71,35,000
29-03-2022	5,000	10	64	3,20,000	Transfer	2583900	12,74,55,000
29-03-2022	5,000	10	64	3,20,000	Transfer	2588900	12,77,75,000
29-03-2022	10,000	10	64	6,40,000	Transfer	2598900	12,84,15,000
29-03-2022	6,525	10	64	4,17,600	Transfer	2605425	12,88,32,600
29-03-2022	8,71,642	10	64	5,57,85,088	Transfer	3477067	18,46,17,688



Date of Acquisition	No. of Equity Shares	Face Value (₹)	Cost per Equity Share (₹)	Total Cost (in ₹)	Nature of transaction	Cumulative No. of Equity Shares	Cumulative amount (in ₹)
29-03-2022	57,500	10	64	36,80,000	Transfer	3534567	18,82,97,688
06-11-2024	35,34,567	5	-	-	Sub-Division	70,69,134	18,82,97,688
08-11-2024	2,12,07,402	5	-	-	Bonus Issue	2,82,76,536	18,82,97,688

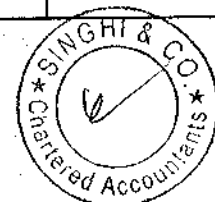
Cost per Equity Share ₹ 6.66

Weighted Average cost per Equity Share ₹ 6.66

2. Shruti Kishorepuria**

(in ₹ except number of shares and cost per shares)

Date of Acquisition	No. of Equity Shares	Face Value (₹)	Cost per Equity Share (₹)	Total Cost (in ₹)	Nature of transaction	Cumulative No. of Equity Shares	Cumulative amount (in ₹)
28-09-2016	1,62,500	10	40	65,00,000	Allotment	1,62,500	65,00,000
05-10-2016	1,67,500	10	40	67,00,000	Allotment	3,30,000	1,32,00,000
17-10-2016	35,000	10	40	14,00,000	Allotment	3,65,000	1,46,00,000
15-09-2017	7,50,000	10	40	3,00,00,000	Allotment	11,15,000	4,46,00,000
01-04-2020	87,500	10	51	44,62,500	Transfer	12,02,500	4,90,62,500
01-04-2020	1,38,020	10	51	70,39,020	Transfer	13,40,520	5,61,01,520
01-04-2020	5,57,300	10	51	2,84,22,300	Transfer	18,97,820	8,45,23,820
01-04-2020	3,10,000	10	51	1,58,10,000	Transfer	22,07,820	10,03,33,820
23-11-2020	45,000	10	51	22,95,000	Allotment	22,52,820	10,26,28,820
11-03-2021	2,10,000	10	51	1,07,10,000	Allotment	24,62,820	11,33,38,820
18-03-2021	62,000	10	51	31,62,000	Transfer	25,24,820	11,65,00,820
09-08-2021	1,22,525	10	51	62,48,775	Transfer	26,47,345	12,27,49,595
09-08-2021	1,27,500	10	51	65,02,500	Transfer	27,74,845	12,92,52,095
09-08-2021	75,000	10	51	38,25,000	Transfer	28,49,845	13,30,77,095
09-08-2021	1,02,500	10	51	52,27,500	Transfer	29,52,345	13,83,04,595
09-08-2021	1,52,500	10	51	77,77,500	Transfer	31,04,845	14,60,82,095
29-03-2022	2,65,358	10	64	1,69,82,912	Transfer	33,70,203	16,30,65,007
07-06-2022	4,35,000	10	93	4,04,55,000	Allotment	38,05,203	20,35,20,007
06-11-2024	38,05,203	5	0	0	Sub-Division	76,10,406	20,35,20,007



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Date of Acquisition	No. of Equity Shares	Face Value (₹)	Cost per Equity Share (₹)	Total Cost (in ₹)	Nature of transaction	Cumulative No. of Equity Shares	Cumulative amount (in ₹)
08-11-2024	2,28,31,218	5	0	0	Bonus Issue	3,04,41,624	20,35,20,007

Cost per Equity Share ₹ 6.69

Weighted Average cost per Equity Share ₹ 6.69

3. BFL Private Limited**

(in ₹ except number of shares and cost per shares)

Date of Acquisition	No. of Equity Shares	Face Value (₹)	Cost per Equity Share (₹)	Total Cost (in ₹)	Nature of transaction	Cumulative No. of Equity Shares	Cumulative amount (in ₹)
14-06-2016	55,500	10	40	22,20,000	Allotment	55,500	22,20,000
14-06-2016	25	10	40	1000	Transfer	55,525	22,21,000
28-09-2016	1,02,500	10	40	41,00,000	Allotment	1,58,025	63,21,000
05-10-2016	1,50,000	10	40	60,00,000	Allotment	3,08,025	1,23,21,000
06-12-2016	2,28,500	10	40	91,40,000	Allotment	5,36,525	2,14,61,000
06-04-2017	45,000	10	40	18,00,000	Allotment	5,81,525	2,32,61,000
20-04-2017	30,000	10	40	12,00,000	Allotment	6,11,525	2,44,61,000
27-03-2018	1,67,500	10	40	67,00,000	Allotment	7,79,025	3,11,61,000
01-04-2020	1,93,125	10	51	98,49,375	Transfer	9,72,150	4,10,10,375
23-11-2020	1,40,000	10	51	71,40,000	Allotment	11,12,150	4,81,50,375
11-03-2021	1,54,000	10	51	78,54,000	Allotment	12,66,150	5,60,04,375
06-11-2024	12,66,150	10	0	0	Sub-division	25,32,300	5,60,04,375
08-11-2024	75,96,900	5	0	0	Bonus issue	1,01,29,200	5,60,04,375
18-11-2024	45,45,450	5	110	49,99,99,500	Preferential allotment	1,46,74,650	55,60,03,875

Cost per Equity Share ₹ 37.89

Weighted Average cost per Equity Share ₹ 37.89



4. Karan Kishorepuria

(in ₹ except number of shares and cost per shares)

Date of Acquisition	No. of Equity Shares	Face Value (₹)	Cost per Equity Share (₹)	Total Cost (in ₹)	Nature of transaction	Cumulative No. of Equity Shares	Cumulative amount (in ₹)
01-03-2022	1,20,000	10	0	0	Gift	1,20,000	0
06-11-2024	1,20,000	5	0	0	Sub-division	2,40,000	0
08-11-2024	7,20,000	5	0	0	Bonus issue	9,60,000	0

Cost per Equity Share ₹ 0

Weighted Average cost per Equity Share ₹ 0

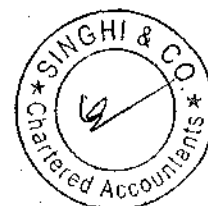
5. SRM Private Limited

(in ₹ except number of shares and cost per shares)

Date of Acquisition	No. of Equity Shares	Face Value (₹)	Cost per Equity Share (₹)	Total Cost (in ₹)	Nature of transaction	Cumulative No. of Equity Shares	Cumulative amount (in ₹)
07-12-2015	62,500	10	40	25,00,000	Preferential Allotment	62,500	25,00,000
14-06-2016	38,000	10	40	15,20,000	Right Issue	1,00,500	40,20,000
12-06-2017	47,500	10	40	19,00,000	Preferential Allotment	1,48,000	59,20,000
01-04-2020	1,93,130	10	51	98,49,630	Transfer	3,41,130	1,57,69,630
23-11-2020	2,40,000	10	51	1,22,40,000	Right Issue	5,81,130	2,80,09,630
11-03-2021	2,05,000	10	51	1,04,55,000	Right Issue	7,86,130	3,84,64,630
06-11-2024	7,86,130	5	0	0	Sub-division	15,72,260	3,84,64,630
08-11-2024	47,16,780	5	0	0	Bonus issue	62,89,040	3,84,64,630
18-11-2024	9,09,090	5	110	9,99,99,900	Preferential Allotment	71,98,130	13,84,64,530

Cost per Equity Share ₹ 19.24

Weighted Average cost per Equity Share ₹ 19.24



Annexure B

Weighted average cost of acquisition of all Equity Shares during last one year

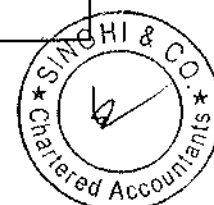
(in ₹ except number of shares and cost per shares)

Date of Acquisition	Nature of transaction	Name of the Shareholder	No. of Equity Shares	No. of Equity Shares (Post Split)	Cost per Equity Share (in ₹)	Total Cost (₹)
08-11-2024	Bonus Issue	Raj Kumar Kishorepuria		52,500	-	-
08-11-2024	Bonus Issue	Anil Kishorepuria		2,12,07,402	-	-
08-11-2024	Bonus Issue	SRM Private Limited		47,16,780	-	-
08-11-2024	Bonus Issue	BFL Private Limited		75,96,900	-	-
08-11-2024	Bonus Issue	Shruti Kishorepuria		2,28,31,218	-	-
08-11-2024	Bonus Issue	Raj Kumar Kishorepuria HUF		1,16,250	-	-
08-11-2024	Bonus Issue	Rohan Kishorepuria		2,70,000	-	-
08-11-2024	Bonus Issue	Karan Kishorepuria		7,20,000	-	-
18-11-2024	Preferential Allotment	SRM Private Limited		9,09,090	110.00	9,99,99,900
18-11-2024	Preferential Allotment	BFL Private Limited		45,45,450	110.00	49,99,99,500
Total				6,29,65,590		59,99,99,400
Weighted Average cost per Equity Share ₹ 9.53						

Weighted average cost of acquisition of all Equity Shares during last eighteen months

(in ₹ except number of shares and cost per shares)

Date of Acquisition	Nature of transaction	Name of the Shareholder	No. of Equity Shares	No. of Equity Shares (Post Split)	Cost per Equity Share (in ₹)	Total Cost (₹)
08-11-2024	Bonus Issue	Raj Kumar Kishorepuria		52,500	-	-
08-11-2024	Bonus Issue	Anil Kishorepuria		2,12,07,402	-	-
08-11-2024	Bonus Issue	SRM Private Limited		47,16,780	-	-



Date of Acquisition	Nature of transaction	Name of the Shareholder	No. of Equity Shares	No. of Equity Shares (Post Split)	Cost per Equity Share (in ₹)	Total Cost (₹)
08-11-2024	Bonus Issue	BFL Private Limited		75,96,900	-	-
08-11-2024	Bonus Issue	Shruti Kishorepuria		2,28,31,218	-	-
08-11-2024	Bonus Issue	Raj Kumar Kishorepuria HUF		1,16,250	-	-
08-11-2024	Bonus Issue	Rohan Kishorepuria		2,70,000	-	-
08-11-2024	Bonus Issue	Karan Kishorepuria		7,20,000	-	-
18-11-2024	Preferential Allotment	SRM Private Limited		9,09,090	110.00	9,99,99,900
18-11-2024	Preferential Allotment	BFL Private Limited		45,45,450	110.00	49,99,99,500
Total				6,29,65,590		59,99,99,400
Weighted Average cost per Equity Share ₹ 9.53						

Weighted average cost of acquisition of all Equity Shares during last three year

(in ₹ except number of shares and cost per shares)

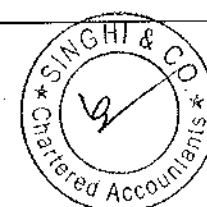
Date of Acquisition	Nature of transaction	Name of the Shareholder	No. of Equity Shares	No. of Equity Shares (Post Split)	Cost per Equity Share (in ₹)	Total Cost (₹)
08-11-2024	Bonus Issue	Raj Kumar Kishorepuria		52,500	-	-
08-11-2024	Bonus Issue	Anil Kishorepuria		2,12,07,402	-	-
08-11-2024	Bonus Issue	SRM Private Limited		47,16,780	-	-
08-11-2024	Bonus Issue	BFL Private Limited		75,96,900	-	-
08-11-2024	Bonus Issue	Shruti Kishorepuria		2,28,31,218	-	-
08-11-2024	Bonus Issue	Raj Kumar Kishorepuria HUF		1,16,250	-	-
08-11-2024	Bonus Issue	Rohan Kishorepuria		2,70,000	-	-
08-11-2024	Bonus Issue	Karan Kishorepuria		7,20,000	-	-
18-11-2024	Preferential Allotment	SRM Private Limited		9,09,090	110.00	9,99,99,900

Date of Acquisition	Nature of transaction	Name of the Shareholder	No. of Equity Shares	No. of Equity Shares (Post Split)	Cost per Equity Share (in ₹)	Total Cost (₹)
18-11-2024	Preferential Allotment	BFL Private Limited		45,45,450	110.00	49,99,99,500
Total				6,29,65,590		59,99,99,400
Weighted Average cost per Equity Share ₹ 9.53						

Equity Shares acquired by the Promoters in the preceding three years.

(in ₹ except number of shares and cost per shares)

Name of the Promoter	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment / Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Anil Kishore puria	08-11-2024	2,12,07,402	0	0	0	Bonus issue	2,12,07,402	0	0.00
Cost per Equity Share ₹ 0.00									
Weighted Average cost per Equity Share ₹ 0.00									
Shruti Kishore puria	08-11-2024	2,28,31,218	0	0	0	Bonus issue	2,28,31,218	0	0.00
Cost per Equity Share ₹ 0.00									
Weighted Average cost per Equity Share ₹ 0.00									
BFL Pvt. Ltd.	08-11-2024	75,96,900	0	0	0	Bonus issue	75,96,900	0	0.00
	18-11-2024	45,45,450	110	49,99,99,500	49,99,99,500	Preferential allotment	1,21,42,350	49,99,99,500	41.18
Cost per Equity Share ₹ 41.18									
Weighted Average cost per Equity Share ₹ 41.18									
Karan Kishore puria	08-11-2024	7,20,000	0	0	0	Bonus issue	7,20,000	0	0.00
Cost per Equity Share ₹ 0									



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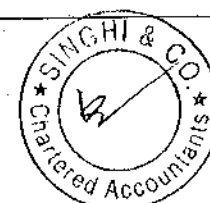
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Name of the Promoter	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment / Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Weighted Average cost per Equity Share ₹ 0									

Equity Shares acquired by the Promoters in the preceding 18 months

(in ₹ except number of shares and cost per shares)

Name of the Promoter	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment / Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Anil Kishore puria	08-11-2024	2,12,07,402	0	0	0	Bonus issue	2,12,07,402	0	0.00
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
Shruti Kishore puria	08-11-2024	2,28,31,218	0	0	0	Bonus issue	2,28,31,218	0	0.00
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
Karan Kishore puria	08-11-2024	7,20,000	0	0	0	Bonus issue	7,20,000	0	0.00
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
BFL Pvt. Ltd.	08-11-2024	75,96,900	0	0	0	Bonus issue	75,96,900	0	0.00
	18-11-2024	45,45,450	110	49,99,99,500	49,99,99,500	Preferential allotment	1,21,42,350	49,99,99,500	41.18
Cost per Equity Share ₹ 41.18									
Weighted Average cost per Equity Share ₹ 41.18									



Equity Shares acquired by the Promoters in the last 1 year

(in ₹ except number of shares and cost per shares)

Name of the Promoter	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment or Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Anil Kishore puria	08-11-2024	2,12,07,402	0	0	0	Bonus issue	2,12,07,402	0	0.00
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
Shruti Kishore puria	08-11-2024	2,28,31,218	0	0	0	Bonus issue	2,28,31,218	0	0.00
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
Karan Kishore puria	08-11-2024	7,20,000	0	0	0	Bonus issue	7,20,000	0	0.00
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
BFL Pvt. Ltd.	08-11-2024	75,96,900	0	0	0	Bonus issue	75,96,900	0	0.00
	18-11-2024	45,45,450	110	49,99,99,500	49,99,99,500	Preferential allotment	1,21,42,350	49,99,99,500	41.18
Cost per Equity Share ₹ 41.18									
Weighted Average cost per Equity Share ₹ 41.18									



Equity Shares acquired by the Promoter Group in the preceding 3 years

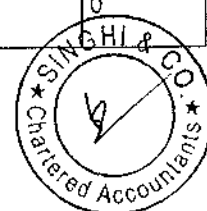
(in ₹ except number of shares and cost per shares)

Name of the Promoter Group	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment/Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Raj Kumar Kishore puria	08-11-2024	52,500	0	0	0	Bonus issue	52,500	0	0
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
Raj Kumar Kishore puria-HUF	08-11-2024	1,16,250	0	0	0	Bonus issue	1,16,250	0	0
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
SRM Pvt. Ltd.	08-11-2024	47,16,780	0	0	0	Bonus issue	47,16,780	0	0
	18-11-2024	9,09,090	110	9,99,99,900	9,99,99,900	Preferential allotment	56,25,870	9,99,99,900	17.78
Cost per Equity Share ₹ 17.78									
Weighted Average cost per Equity Share ₹ 17.78									

Equity Shares acquired by the Promoter Group in the last 18 months

(in ₹ except number of shares and cost per shares)

Name of the Promoter Group	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment/Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Raj Kumar	08-11-2024	52500	0	0	0	Bonus issue	52,500	0	0

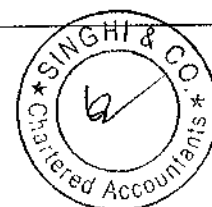


Name of the Promoter Group	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment / Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Kishore puria									
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
Raj Kumar Kishore puria-HUF	08-11-2024	1,16,250	0	0	0	Bonus issue	1,16,250	0	0
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
SRM Pvt. Ltd.	08-11-2024	47,16,780	0	0	0	Bonus issue	47,16,780	0	0
	18-11-2024	9,09,090	110	9,99,99,900	9,99,99,900	Preferential allotment	56,25,870	9,99,99,900	17.78
Cost per Equity Share ₹ 17.78									
Weighted Average cost per Equity Share ₹ 17.78									

Equity Shares acquired by the Promoter Group in the last 1 year

(in ₹ except number of shares and cost per shares)

Name of the Promoter Group	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment / Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Raj Kumar Kishore puria	08-11-2024	52500	0	0	0	Bonus issue	52,500	0	0
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									



Name of the Promoter Group	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment / Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Raj Kumar Kishore puria-HUF	08-11-2024	1,16,250	0	0	0	Bonus issue	1,16,250	0	0
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
SRM Pvt. Ltd.	08-11-2024	47,16,780	0	0	0	Bonus issue	47,16,780	0	0
	18-11-2024	9,09,090	110	9,99,99,900	9,99,99,900	Preferential allotment	56,25,870	9,99,99,900	17.78
Cost per Equity Share ₹ 17.78									
Weighted Average cost per Equity Share ₹ 17.78									

Equity Shares transacted by persons other than Promoters and Promoter Group in the preceding 3 years

(in ₹ except number of shares and cost per shares)

Name of the Promoter Group	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment / Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Rohan Kishore puria	08-11-2024	2,70,000	0	0	0	Bonus issue	2,70,000	0	0
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									



Equity Shares transacted by persons other than Promoters and Promoter Group in the preceding 18 months

(in ₹ except number of shares and cost per shares)

Name of the Promoter Group	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment / Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Rohan Kishore puria	08-11-2024	2,70,000	0	0	0	Bonus issue	2,70,000	0	0
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									

Equity Shares transacted by persons other than Promoters and Promoter Group in the last 1 year

(in ₹ except number of shares and cost per shares)

Name of the Promoter Group	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment / Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Rohan Kishore puria	08-11-2024	2,70,000	0	0	0	Bonus issue	2,70,000	0	0
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									



Equity Shares acquired by the Selling Shareholder in the preceding 3 years

(in ₹ except number of shares and cost per shares)

Name of the Promoter	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment / Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Anil Kishore puria	08-11-2024	2,12,07,402	0	0	0	Bonus issue	2,12,07,412	0	0.00
Cost per Equity Share ₹ 0.00									
Weighted Average cost per Equity Share ₹ 0.00									
Shruti Kishore puria	08-11-2024	2,28,31,218	0	0	0	Bonus issue	2,28,31,218	0	0.00
Cost per Equity Share ₹ 0.00									
Weighted Average cost per Equity Share ₹ 0.00									
BFL Pvt. Ltd.	08-11-2024	75,96,900	0	0	0	Bonus issue	75,96,900	0	0.00
	18-11-2024	45,45,450	110	49,99,99,500	49,99,99,500	Preferential allotment	1,21,42,350	49,99,99,500	41.18
Cost per Equity Share ₹ 41.18									
Weighted Average cost per Equity Share ₹ 41.18									
SRM Pvt. Ltd.	08-11-2024	47,16,780	0	0	0	Bonus issue	47,16,780	0	0.00
	18-11-2024	9,09,090	110	9,99,99,900	9,99,99,900	Preferential Allotment	56,25,870	9,99,99,900	17.78
Cost per Equity Share ₹ 17.78									
Weighted Average cost per Equity Share ₹ 17.78									



Equity Shares acquired by the Selling Shareholder in the preceding 18 months

(in ₹ except number of shares and cost per shares)

Name of the Promoter	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment/Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Anil Kishorep uria	08-11-2024	2,12,07,402	0	0	0	Bonus issue	2,12,07,402	0	0.00
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
Shruti Kishorep uria	08-11-2024	2,28,31,218	0	0	0	Bonus issue	2,28,31,218	0	0.00
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
BFL Pvt. Ltd.	08-11-2024	75,96,900	0	0	0	Bonus issue	75,96,900	0	0.00
	18-11-2024	45,45,450	110	49,99,99,500	49,99,99,500	Preferential allotment	1,21,42,350	49,99,99,500	41.18
Cost per Equity Share ₹ 41.18									
Weighted Average cost per Equity Share ₹ 41.18									
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	18-11-2024	9,09,090	110	9,99,99,900	9,99,99,900	Preferential Allotment	56,25,870	9,99,99,900	17.78
Cost per Equity Share ₹ 17.78									
Weighted Average cost per Equity Share ₹ 17.78									



Equity Shares acquired by the Selling Shareholder in the last 1 year

₹ except number of shares and cost per shares)

Name of the Promoter	Date of Acquisition	No. of Equity Shares	Cost per Equity Share (₹)	Total Cost (in ₹)	Consideration	Reasons for Allotment/Transfer	Cumulative No. of Equity Shares	Cumulative amount (in ₹)	Cumulative Acquisition price per Equity Share
Anil Kishorep uria	08-11-2024	2,12,07,402	0	0	0	Bonus issue	2,12,07,402	0	0.00
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
Shruti Kishorep uria	08-11-2024	2,28,31,218	0	0	0	Bonus issue	2,28,31,218	0	0.00
Cost per Equity Share ₹ 0									
Weighted Average cost per Equity Share ₹ 0									
BFL Pvt. Ltd.	08-11-2024	75,96,900	0	0	0	Bonus issue	75,96,900	0	0.00
	18-11-2024	45,45,450	110	49,99,99,500	49,99,99,500	Preferential allotment	1,21,42,350	49,99,99,500	41.18
Cost per Equity Share ₹ 41.18									
Weighted Average cost per Equity Share ₹ 41.18									
SRM Pvt. Ltd.	08-11-2024	47,16,780	0	0	0	Bonus issue	47,16,780	0	0.00
	18-11-2024	9,09,090	110	9,99,99,900	9,99,99,900	Preferential Allotment	56,25,870	9,99,99,900	17.78
Cost per Equity Share ₹ 17.78									
Weighted Average cost per Equity Share ₹ 17.78									

Note: Equity shares acquired have been considered at nil value in calculation of weighted/ average cost of equity shares in the cases where the same were acquired through gift/ will/ on issue of bonus shares for which no consideration has been paid.



Subsequent changes to the shareholding and the cost of acquisition of shares by the Promoter, Promoter Group and other entities:

1. The Company has confirmed that till the date on which the Equity Shares commence trading on the BSE Limited (**BSE**) and the National Stock Exchange of India Limited (**NSE**) and together with BSE, the **Stock Exchanges**, any acquisition and, or, sale of any shares of the Company by any of its promoters will immediately be intimated to us i.e. within 12 hours of the transaction and the Book Running Lead Managers (the said confirmation is attached herewith and marked as **Annexure A**).
2. We hereby undertake that upon receipt of any intimation in accordance with Annexure A, we will immediately update and provide to the Company and the Book Running Lead Managers an updated version of this certificate.
3. We hereby consent to the extracts of this certificate being used in the red herring prospectus and the prospectus to be filed with the Registrar of Companies, West Bengal at Kolkata (**RoC**) and submitted to the SEBI and the Stock Exchanges in connection with the Offer, and submission of this certificate as may be necessary, to any regulatory authority statutory, judicial or governmental authorities, and in any other material used in connection with the Offer and for disclosure on the website of the Company in connection with the Offer and/or for the records to be maintained by the Book Running Lead Managers in connection with the Offer and in accordance with applicable law. We also consent to this certificate to be uploaded on the website, repository and, or, the database of the Stock Exchanges.
4. We confirm that the information in this certificate is true, fair and correct. We hereby consent to this certificate being disclosed by the Book Running Lead Managers, if required (i) by reason of any law, regulation, order or request of a court or by any governmental or competent regulatory authorities or (ii) in seeking to establish a defence in connection with, or to avoid any actual, potential or threatened legal, arbitral or regulatory proceeding or investigation related to any matter regarding issuance and listing of the equity shares of the Company. We undertake to update you, in writing, of any change in the above-mentioned disclosures which we are aware of until the Equity Shares allotted, pursuant to the Offer, are listed and commence trading on the Stock Exchanges. In the absence of any such communication from us, the above information should be considered as updated information until the Equity Shares commence trading on the Stock Exchanges, pursuant to the Offer.
5. This certificate may be relied on by the Book Running Lead Managers, its affiliates and the legal counsel in relation to the Offer and to assist the Book Running Lead Managers in the context of due diligence procedures that the Book Running Lead Managers has to conduct and the documents in relation of their investigation of the affairs of the Company in connection with the Offer.



Singhi & Co.

Chartered Accountants

.....contd.

6 All capitalized terms not defined herein bear the meaning ascribed to them in the Offer Documents.

Yours sincerely,

For Singhi & Co.

Chartered Accountants

Firm Registration No:302049E



(Giridhari Lal Choudhary)

Partner

Membership No.: 052112

Date: August 06, 2025

Place: Kolkata

UDIN: 25052025ML2909681

Cc:

Legal Counsel to the Offer

Bharucha & Partners

13th Floor, Free Press House,

Free Press Journal Marg,

Nariman Point,

Mumbai, Maharashtra 400021



Annexure A

Date: August 06, 2025

To,

M/s Singhi & Co.

161, Sarat Bose Road

Kolkata- 700026

(hereinafter referred to as the **Statutory Auditor**)

Dear Sir,

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

We hereby confirm that we will immediately inform the Statutory Auditor and the Book Running Lead Managers to the Offer, of any acquisition and, or, sale of any shares of the Company by any of its Promoters till the date the Equity Shares commence trading on the BSE Limited and the National Stock Exchange of India Limited.

All capitalized terms not defined herein bear the meaning ascribed to them in the Offer Documents for the Offer.

Yours sincerely,

For Regaal Resources Limited

ANIL
KISHOREPURIA
Digitally signed by
ANIL KISHOREPURIA
Date: 2025.08.06
05:21:38 +05'30'

Anil Kishorepuria
Managing Director



Cc:

Pantomath Capital Advisors Private Limited

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

and

Sumedha Fiscal Services Limited

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

Legal Counsel to the Offer

Bharucha & Partners

13th Floor, Free Press House,
Free Press Journal Marg,
Nariman Point,
Mumbai, Maharashtra 400021

Date: August 06, 2025

To,

M/s Singhi & Co.

161, Sarat Bose Road

Kolkata- 700026

(hereinafter referred to as the **Statutory Auditor**)

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We hereby confirm that we will immediately inform the Statutory Auditor and the Book Running Lead Managers to the Offer, of any acquisition and, or, sale of any shares of the Company by any of its Promoters till the date the Equity Shares commence trading on the BSE Limited and the National Stock Exchange of India Limited.

All capitalized terms not defined herein bear the meaning ascribed to them in the Offer Documents for the Offer.

Yours sincerely,

For Regaal Resources Limited

SHRUTI
KISHOREPURIA

Digitally signed by
SHRUTI KISHOREPURIA
Date: 2025.08.05
05:22:51 +05'30'

Shruti Kishorepuria
Promoter

Cc:

Pantomath Capital Advisors Private Limited

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

and

Sumedha Fiscal Services Limited

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

Legal Counsel to the Offer

Bharucha & Partners

13th Floor, Free Press House,
Free Press Journal Marg,
Nariman Point,
Mumbai, Maharashtra 400021



Date: August 06, 2025

To,

M/s Singhi & Co.

161, Sarat Bose Road

Kolkata- 700026

(hereinafter referred to as the **Statutory Auditor**)

Dear Sir,

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

We hereby confirm that we will immediately inform the Statutory Auditor and the Book Running Lead Managers to the Offer, of any acquisition and, or, sale of any shares of the Company by any of its Promoters till the date the Equity Shares commence trading on the BSE Limited and the National Stock Exchange of India Limited.

All capitalized terms not defined herein bear the meaning ascribed to them in the Offer Documents for the Offer.

Yours sincerely,

For Regaal Resources Limited

Karan Kishorepuria

Karan Kishorepuria
Whole Time Director



Cc:

Pantomath Capital Advisors Private Limited

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

and

Sumedha Fiscal Services Limited

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

Legal Counsel to the Offer

Bharucha & Partners

13th Floor, Free Press House,
Free Press Journal Marg,
Nariman Point,
Mumbai, Maharashtra 400021

Date: August 06, 2025

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M/s Singhi & Co.

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Kolkata- 700026

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All capitalized terms not defined herein bear the meaning ascribed to them in the Offer Documents for the Offer.

Yours sincerely,

For Regaal Resources Limited

ANIL
KISHOREPURI
A

Digitally signed by
ANIL KISHOREPURI
Date: 2025.08.06
05:26:39 +05'30'

BFL Private Limited
Promoter



Cc:

Pantomath Capital Advisors Private Limited

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

and

Sumedha Fiscal Services Limited

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