

From:  
Shruti Family Trust  
8th Floor, Space No. 803 & 804  
Eco Centre, EM - 4, Sector - V,  
Kolkata 700 091

The Chief Financial Officer  
Regaal Resources Ltd.  
6<sup>th</sup> Floor, D2/2, Block - EP & GP  
Sector - V  
Kolkata 700 091



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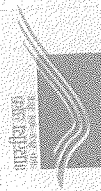
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# SHRUTI FAMILY TRUST

8<sup>TH</sup> FLOOR, SPACE NO. 803 & 804 ECOCENTRE  
EM - 4, SECTOR -V, KOLKATA - 700091  
TEL. NO.: 7604088814 - 16

Dated 29<sup>th</sup> November, 2024

To  
The Chief Financial Officer  
Regaal Resources Ltd.  
6<sup>th</sup> floor, D2/2, Block - EP & GP  
Sector - V, Kolkata 700 091

Dear Sirs,

**Sub: Proposed initial public offering of equity shares by Regaal Resources Limited (Company) comprising a fresh issue of Equity Shares (Fresh Issue) and an offer for sale of Equity Shares by Selling Shareholder(s) (Offer for Sale, and along with Fresh Issue, hereinafter collectively referred to as Offer)**

This refers to correspondence on the above issue resting with your letter dated 06.11.2024. You have mentioned that Regaal has approached SEBI seeking an exemption from disclosing our name as member of the company's promoter group & from making the necessary disclosures. You have also mentioned that SEBI vide its letter dated October 10, 2024 has refused to accede to your request for exemption and has made certain directions including to classify us in Promoter Group.

We have perused the SEBI letter dated October 10, 2024. From its perusal, it is clear that you have failed to bring out all the reasons for our refusal to be classified as member of promoter's group, resulting in refusal by SEBI. We request you to approach SEBI again seeking exemption narrating all the reasons as stated earlier vide our letter dated May 04, 2023 and dated June 07, 2024.

In this regard to above, we once again would like to confirm that:

- (i) Neither Shruti Family Trust nor any one of its trustee are shareholder of the Issuer or its Subsidiaries or any of the businesses owned or controlled by the Promoters of the Issuer.
- (ii) Neither Shruti Family Trust nor any one of its trustee were associated with Regaal Resources Limited as Shareholder
- (iii) The Shruti Family Trust is distinct, separate and completely independent unit from the promoter of the issuer.
- (iv) Neither Shruti Family Trust nor any one of its trustee have any business, financial or any other interest whatsoever in the management, business and day-to-day operations of the Issuer or its subsidiaries or any of the business owned or controlled by the Promoters of the Issuer.
- (v) Neither Shruti Family Trust nor any one of its trustee have furnished any debt facility, loan, security or guarantee to the Issuer or its subsidiaries or any of the business owned or controlled by the Promoters of the Issuer or availed any debt facility, loan, security or guarantee from Issuer or its subsidiaries or any of the businesses owned or controlled by the Promoters of the Issuer.
- (vi) Neither Shruti Family Trust nor any one of its trustee have any control or influence over the affairs of the Issuer or its subsidiaries or any business owned or controlled by the Promoters of the Issuer, directly or indirectly.
- (vii) Neither Shruti Family Trust nor any one of its trustee have any special rights with respect to the Issuer or its subsidiaries through formal or informal arrangements.
- (viii) We are two separate unit functioning independently without having any common interest



# **SHRUTI FAMILY TRUST**

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In the given scenario it is desirable that we are not identified in the Promoter Group of Regaal Resources. Inclusion of our name in the Offer Document of Regaal would give wrong perception to the prospective investors

Hence we advise you to approach SEBI again seeking exemption from inclusion of our name in Promoters Group of Regaal, to protect the interest of prospective investors of Regaal. Application need to include all the points mentioned above enabling SEBI to take a view based on all facts.

In any case we don't accord our consent for inclusion of our name under Promoter Group in the Offer Document of Regaal.

This letter has been issued as per the request made by the Issuer and we authorize you to deliver a copy of this letter to any legal/governmental/regulatory authorities as required under any applicable laws or if requested for by any such legal/governmental/regulatory authority or by court order under intimation to us.

**For Shruti Family Trust**



**Trustee**

**Place:** Kolkata