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**SHRI HARE-KRISHNA SPONGE IRON LIMITED**  
**CIN: U27109WB2003PLC096152**

Our Company was originally incorporated as a private limited Company under the name of "Shri Hare-Krishna Sponge Iron Private Limited" on May 02, 2003 under the provisions of the Companies Act, 1956 with the Registrar of Companies, West Bengal bearing registration number as 096152. Thereafter, our Company was converted from private limited to public limited, pursuant to a special resolution passed by the shareholders of our Company on May 25, 2007 and the name of the Company was changed from "Shri Hare-Krishna Sponge Iron Private Limited" to "Shri Hare-Krishna Sponge Iron Limited" vide fresh certificate of incorporation dated June 20, 2007, issued by the Registrar of Companies, West Bengal.

**Registered Office:** Flat No 2D, 2nd Floor , Tower No. 1, Alcove Gloria, Municipal Premises No 403/1, Dakshindari Road, VIP Road, Kolkata, , Sreebhumti, North 24 Parganas, West Bengal 700048.

**Contact Person:** Rashmeet Kaur, Company Secretary & Compliance Officer

**Tel No:** +91-9589116050; **E-mail:** cs@shkraipur.com; **Website:** <https://shkraipur.com>

**PROMOTORS OF OUR COMPANY: SHYAM SUNDER PARASRAMPURIA, MANOJ PARASRAMPURIA, MANISH PARASRAMPURIA, ANUBHAV PARASRAMPURIA, ANITA TRADELINKS PRIVATE LIMITED AND BUXOM TREXIM PRIVATE LIMITED.**

**ADDENDUM TO THE DRAFT RED HERRING PROSPECTUS DATED SEPTEMBER 28, 2024: NOTICE TO THE INVESTORS ("THE ADDENDUM")**

INITIAL PUBLIC OFFER UPTO 50,70,000 EQUITY SHARES OF FACE VALUE OF INR 10/- EACH (THE "EQUITY SHARES") OF SHRI HARE-KRISHNA SPONGE IRON LIMITED ("OUR COMPANY" OR "SHKSIL" OR "THE ISSUER") AT AN ISSUE PRICE OF ₹ [●] PER EQUITY SHARE FOR CASH, AGGREGATING UP TO ₹ [●] LAKHS ("PUBLIC ISSUE") OUT OF WHICH 2,58,000 EQUITY SHARES OF FACE VALUE OF ₹ 10 EACH, AT AN ISSUE PRICE OF ₹ [●] PER EQUITY SHARE FOR CASH, AGGREGATING ₹ [●] LAKHS WILL BE RESERVED FOR SUBSCRIPTION BY THE MARKET MAKER TO THE ISSUE (THE "MARKET MAKER RESERVATION PORTION"). THE PUBLIC ISSUE LESS MARKET MAKER RESERVATION PORTION I.E. ISSUE OF [●] EQUITY SHARES OF FACE VALUE OF INR 10 EACH, AT AN ISSUE PRICE OF INR [●] PER EQUITY SHARE FOR CASH, AGGREGATING UPTO INR [●] MILLIONS IS HEREIN AFTER REFERRED TO AS THE "NET ISSUE". THE PUBLIC ISSUE AND NET ISSUE WILL CONSTITUTE 26.42% AND 25.07% RESPECTIVELY OF THE POST- ISSUE PAID-UP EQUITY SHARE CAPITAL OF OUR COMPANY.

Potential Bidders may note the following:

1. The Chapter titled "**DEFINITIONS AND ABBREVIATIONS**" beginning on page 1 of the Draft Red Herring Prospectus has been updated
2. The Chapter titled "**SUMMARY OF DRAFT RED HERRING PROSPECTUS**" beginning on page 20 of the Draft Red Herring Prospectus has been updated
3. The Chapter titled "**RISK FACTORS**" beginning on page 25 of the Draft Red Herring Prospectus has been updated
4. The Chapter titled "**CAPITAL STRUCTURE**" beginning on page 57 of the Draft Red Herring Prospectus has been updated
5. The Chapter titled "**OBJECTS OF THE ISSUE**" beginning on page 79 of the Draft Red Herring Prospectus has been updated
6. The Chapter titled "**OUR BUSINESS**" beginning on page 112 of the Draft Red Herring Prospectus has been updated
7. The Chapter titled "**KEY INDUSTRY REGULATIONS AND POLICIES**" beginning on page 121 of the Draft Red Herring Prospectus has been updated
8. The Chapter titled "**OUR MANAGEMENT**" beginning on page 133 of the Draft Red Herring Prospectus has been updated
9. The Chapter titled "**OUR PROMOTERS & PROMOTER GROUP**" beginning on page 147 of the Draft Red Herring Prospectus has been updated
10. The Chapter titled "**OUTSTANDING LITIGATION AND MATERIAL DEVELOPMENTS**" beginning on page 210 of the Draft Red Herring Prospectus has been updated
11. The Chapter titled "**GOVERNMENT AND OTHER APPROVALS**" beginning on page 214 of the Draft Red Herring Prospectus has been updated
12. The Chapter titled "**OUR GROUP COMPANIES**" beginning on page 220 of the Draft Red Herring Prospectus has been updated
13. The Chapter titled "**ISSUE PROCEDURE**" beginning on page 249 of the Draft Red Herring Prospectus has been updated
14. The Chapter titled "**DECLARATION**" beginning on page 298 of the Draft Red Herring Prospectus has been updated
15. Please note that all other details in, and updates to the Red Herring Prospectus/ Prospectus with respect to offer price and/or other relevant details will be carried out in the Red Herring Prospectus, as and when filed with ROC, SEBI and the Stock Exchange.

The above is to be read in conjunction with the Draft Red Herring Prospectus and accordingly their references in the Draft Red Herring Prospectus stand amended pursuant to this Addendum. Please note that the changes pursuant to this Addendum will be appropriately included in the Red Herring Prospectus/ Prospectus, as and when filed with the RoC, the SEBI and the Stock Exchanges. All capitalized terms used in this Addendum shall, unless the context otherwise requires, have the meaning ascribed to them in the Draft Red Herring Prospectus.

On behalf of **SHRI HARE-KRISHNA SPONGE IRON LIMITED**

Sd/-

**Rashmeet Kaur,**  
**Company Secretary and Compliance Officer**

Place: Raipur

Date: January 09, 2025.

BOOK RUNNING LEAD MANAGER TO THE ISSUE	REGISTRAR TO THE ISSU
<b>HEM SECURITIES LIMITED</b>	<b>KFin Technologies Limited</b>

904, A Wing, Naman Midtown, Senapati Bapat Marg,  
Elphinstone Road, Lower Parel, Mumbai-400013, India  
**Tel. No.:** +91- 022- 49060000;  
**Fax No.:** +91- 022- 22625991  
**Email:** [ib@hemsecurities.com](mailto:ib@hemsecurities.com)  
**Investor Grievance Email:** [redressal@hemsecurities.com](mailto:redressal@hemsecurities.com)  
**Website:** [www.hemsecurities.com](http://www.hemsecurities.com)  
**Contact Person :** Neelkanth Agrawal  
**SEBI Regn. No.** INM000010981

**Address:** Selenium Tower B, Plot No-31 & 32, Financial District, Nanakramguda, Serilingampally, Hyderabad Rangareddi TG, 500032  
**Telephone:** +91 40 67162222, 18003094001; **Email:** [shrihare.ipo@kfintech.com](mailto:shrihare.ipo@kfintech.com)  
**Investor Grievance Email:** [einward.ris@kfintech.com](mailto:einward.ris@kfintech.com)  
**Website:** [www.kfintech.com](http://www.kfintech.com)  
**Contact Person:** M. Murali Krishna  
**SEBI Registration Number:** INR000000221  
**CIN:** L72400TG2017PLC117649

#### BID/ISSUE PROGRAMME

<b>ANCHOR PORTION ISSUE OPENS/ CLOSES ON:</b> [●]*	<b>BID/ISSUE OPENS ON:</b> [●]**	<b>BID/ISSUE CLOSES ON:</b> [●]**
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\*The Company may, in consultation with the Book Running Lead Manager, consider participation by Anchor Investors in accordance with the SEBI ICDR Regulations. The Anchor Investor Bid/Issue Period shall be one Working Day prior to the Bid/Issue Opening Date.

\*\*Our Company may, in consultation with the BRLM, consider closing the Bid/Issue Period for QIBs one Working Day prior to the Bid/Issue Closing Date in accordance with the SEBI ICDR Regulations

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## **SECTION I - GENERAL**

### **DEFINITIONS AND ABBREVIATIONS**

Promoters	Shall mean promoters of our Company i.e., Shyam Sunder Parasrampuria, Manoj Parasrampuria, Manish Parasrampuria, Anubhav Parasrampuria, Anita Tradelinks Private Limited and Buxom Trexim Private Limited. For further details, please refer to section titled " <b><i>Our Promoters &amp; Promoters Group</i></b> " beginning on page 147 of this Draft Red Herring Prospectus.
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#### **Technical and Industry Related Terms.**

Term	Description
TEV	Techno Economic Viability

## **SECTION II- SUMMARY OF DRAFT RED HERRING PROSPECTUS**

### **C. PROMOTERS**

The promoters of our company are Anita Tradelinks Private Limited, Buxom Trexim Private Limited, Shyam Sunder Parasrampuria, Manish Parasrampuria, Manoj Parasrampuria and Anubhav Parasrampuria.

### **I. SUMMARY OF OUTSTANDING LITIGATIONS**

Except as mentioned below, as on the date of Red Herring Prospectus our Company is not involved in any legal proceedings:

#### **Litigation/ Matters involving our Company:-**

<b>Nature of Cases</b>	<b>No. of Outstanding Cases</b>	<b>Amount in dispute /demanded to the extent ascertainable</b>
Criminal proceedings against the Company	-	-
Criminal proceedings filed by the Company	-	-
Other pending material litigation against the company	-	-
<b>Tax proceedings:</b>		
Direct Tax	-	-
Indirect Tax	-	-
Other pending material litigation filed by the company	-	-
<b>Total</b>	<b>-</b>	<b>-</b>

#### **Litigations Matters involving our Promoter/Directors: -**

<b>Nature of Cases</b>	<b>No. of Outstanding Cases</b>	<b>Amount in dispute /demanded to the extent ascertainable</b>
Criminal proceedings against the Promoter & Director	-	-
Criminal proceedings filed by the Promoter & Director	-	-
Other pending material litigation against the Promoter & Director	-	-
<b>Tax proceedings:</b>		
Direct Tax	9	41.22*
Indirect Tax	-	-
Other pending material litigation filed by the Promoter & Director	-	-
<b>Total</b>	<b>9</b>	<b>41.22</b>

*\*Amount mentioned to the extent quantifiable. The amount may be subject to additional interest/other charges being levied by the concerned authorities which are unascertainable as on date of this Red Herring Prospectus. For further details, please refer to the chapter titled "Outstanding Litigations and Material Developments" on page 183 of this Draft Red Herring Prospectus.*

For further details of the outstanding litigation proceedings, see "**Outstanding Litigation and Material Developments**" beginning on page 210 of this Red Herring Prospectus.

## **SECTION III-RISK FACTORS**

### **INTERNAL RISK FACTORS**

**3. In the past, our Company contravened certain provisions of the SEBI Act and Regulations, for which SEBI imposed a penalty amounting to Rs. 2,40,000/- on our Company. This penalty was imposed under Section 15HA of the SEBI Act, 1992, for alleged violations in relation to trading activities in the Stock Options Segment of the Bombay Stock Exchange (BSE) during the period from April 1, 2014, to September 30, 2015.**

Our Company received a Collective Show Cause Notice (No. SEBI/HO/EAD9/P/OW/2022/0000044222/3) dated August 19, 2022, from SEBI under Rule 4(1) of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995. The investigation was in relation to large-scale Reversal Trade Data in the Stock Options segment procured by SEBI at BSE between April 1, 2014 to September 30, 2015. SEBI's investigation revealed that our Company was involved in executing reversal trades, where buy and sell positions were reversed on the same day, with the same counterparties, and at a price difference with no underlying basis. These trades allegedly created a false and misleading appearance of trading and artificially inflated volumes in the Stock Options segment. SEBI contended that these trades lacked genuine intent to transfer ownership or rights, thereby violating regulations 3(a), (b), (c), (d) and 4(1), 4(2)(a) of SEBI (Prohibition of Fraudulent and Unfair trade practices relating to securities markets) Regulations, 2003. If these alleged violations were established, our Company could be liable for a monetary penalty under Section 15HA of the SEBI Act. However, on the order of Securities Appellate Tribunal, SEBI introduced a Settlement Scheme in 2024 (ISO Settlement Scheme, 2024), which provided an opportunity for entities involved in such matters to resolve pending proceedings by paying a settlement amount. Our Company availed the benefit of the ISO Settlement Scheme, 2024, and remitted Rs. 2,40,000/- as the settlement amount, along with the applicable legal costs, on April 29, 2024. In lieu of payment of the penalty amount, SEBI passed a Collective Settlement order dated August 19, 2024, which deemed the matter as settled and SEBI shall not initiate any further action against us for the said defaults.

The penalty imposed by SEBI has been fully settled, and the matter is closed. As a result, the penalty should not have any ongoing or future impact on our Company. However, if any similar violations occur in the future, it could adversely affect our reputation, goodwill, and business prospects. Such violations, if detected, could result in penalties, regulatory actions, and other consequences that may negatively impact the Company's operations and market standing.

**8. There have been certain instances of non-compliances/ discrepancies, including with respect to certain secretarial/ regulatory filings for corporate actions taken by our Company in the past. Consequently, we may be subject to regulatory actions and penalties for any such non-compliance/ discrepancies and our business, financial position and reputation may be adversely affected.**

There are few non compliances reported regarding the appointment of KMPs such as Company Secretary was not appointed up to the FY 2019-20, Chief Financial Officer was not appointed upto the FY 2021-22. The company has taken corrective actions with regard to the appointment of Key Managerial Personnel (KMP). Ms. Yamini Maheshwari was appointed as the Company Secretary following the existing appointment of Ms. Rashmeet Kaur and Mr. Ankit Agrawal was appointed as the Chief Financial Officer (CFO) after the financial year 2021-22, succeeding Mr. Abhishek Parasrampuria. These appointments were made in accordance with the provisions of the Companies Act, 2013, the company has not received any penal notice or communication from the Registrar of Companies (RoC) or any other regulatory authorities related to the non-appointment of KMP prior to the financial year 2019-20. The company has not filed annual compliance certificate in Form 66 under the Companies Act 1956. Form 66, no longer in force so corrective action cannot be taken for the same. In addition, the Company has entered into related party transactions [RPTs] in F.Y. 2022-23 with the relatives of directors regarding holding of office of profit exceeding the limits that can be approved by the Board of Directors. However, these transactions have been recorded as RPTs at arm's length price by the statutory auditors of the Company thereby making them exempt from the compliance requirements of Section 188 of the Companies Act 2013, and Board approval duly recorded by the company as per the provision of the companies act 2013.

There are few discrepancies noticed in the company records such as late filing of eforms to the Registrar of Companies, some clerical error exists in the share allotment returns filed to the Registrar of Companies such as some minor clerical errors was existed in the spelling of the shareholder's name, in this regards company has already entered the correct name in the register of shareholders, period of appointment not mentioned in the shareholder resolution for the appointment of past independent director in the FY 2015-16, in this regards the company has made a fresh appointment of independent directors and the previous appointments no longer in force Also, we could not find few share transfer deeds belongings to the promoters for the acquisition made in the FY 2007-08 & 2010-11. The share transfer deeds related to certain transfers, which occurred 15 years ago, are currently untraceable. In light of this, the company has obtained affidavits from the respective concerned shareholders and also a search report dated December 20, 2024, from Anand

Acharya & Associates, Practicing Company Secretary for the untraceable documents. We also relied on the other corporate records maintained by the Company such as statutory registers to ascertain the information for the missing corporate records. To prevent any recurrence of the discrepancies, clerical errors, or delays in filing, the company has appointed a Company Secretary to oversee and closely monitor filing deadlines, ensure proper documentation, and maintain compliance with regulatory requirements. This measure will help enhance the accuracy and timeliness of filings and records. Further, the relevant authorities may initiate action(s) for the non-compliances made by the Company in future and the Company will take appropriate steps towards rectification.

**10. *We require certain approvals, licenses, registrations and permits to operate our business, and failure to obtain or renew them in a timely manner or maintain the statutory and regulatory permits and approvals required to operate our business may adversely affect our operations and financial conditions.***

We require certain approvals, licenses, registrations and permits to operate our business, and failure to obtain or renew them in a timely manner or maintain the statutory and regulatory permits and approvals required to operate our business may adversely affect our operations and financial conditions. Except as described below and as mentioned in the chapter titled “**Government and Other Approvals**”, we believe that we have obtained requisite permits and licenses which are adequate to run our business, however we cannot assure that there is no other statutory/regulatory requirement which we are required to comply with. Further, some of these approvals are granted for fixed periods of time and need renewal from time to time. We are required to renew such permits, licenses and approvals. There can be no assurance that the relevant authorities will issue any of such permits or approvals in time or at all. Failure by us to renew, maintain or obtain the required permits or approvals in time may result in the interruption of our operations and may have a material adverse effect on our business, financial condition and results of operations. We have recently applied for following approvals:

- i. We have applied for Fire NOC dated August 24, 2024 for our Manufacturing unit situated at Plot No 106, Phase-II, Industrial Growth Centre, Siltara, Raipur, 493111. However, we have installed fire safety equipment's at its factory like: Fire Pump Motor, Fire Pump, 50MM MS Pipe, Nozzle, Pump2 Motor, Fire Pump 2, Fire Pump3, 75MM Pipe, Raingun etc

For details regarding pending approvals, please refer to section titled “Government and Other Approvals” beginning on page 214 of the Draft Red Herring Prospectus. There can be no assurance that the relevant authorities will issue or renew these approvals or licenses in a timely manner, or at all. In the event of any unanticipated delay in receipt of such approvals, the proposed capacity expansion plan may extend and any such delay could have an adverse impact on our growth, prospects, cash flows and financial condition. The approvals required by our Company are subject to numerous conditions and there can be no assurance that these would not be suspended or revoked in the event of non-compliance or alleged non-compliance with any terms or conditions thereof, or pursuant to any regulatory action. If there is any failure by us to comply with the applicable regulations or if the regulations governing our business are amended, we may incur increased costs, be subject to penalties, have our approvals and permits revoked or suffer a disruption in our operations, any of which could adversely affect our business

**13. *There are outstanding legal proceedings involving our Company, our Directors and our Promoters. Any adverse decisions could impact our cashflows and profit or loss to the extent of demand amount, interest and penalty, divert management time and attention and have an adverse effect on our business, prospects, results of operations and financial condition.***

**There are outstanding legal proceedings involving our Company, our Directors and our Promoters. For details, see “Outstanding Litigation and Material Developments” beginning on page 210 of this Red Herring Prospectus.**

**Litigation/ Matters involving our Company:-**

<b>Nature of Cases</b>	<b>No. of Outstanding Cases</b>	<b>Amount in dispute /demanded to the extent ascertainable</b>
Criminal proceedings against the Company	-	-
Criminal proceedings filed by the Company	-	-
Other pending material litigation against the company	-	-
<b>Tax proceedings:</b>		
Direct Tax	-	-
Indirect Tax	-	-
Other pending material litigation filed by the company	-	-
<b>Total</b>	<b>-</b>	<b>-</b>

**Litigations Matters involving our Promoter/Directors: -**

<b>Nature of Cases</b>	<b>No. of Outstanding Cases</b>	<b>Amount in dispute /demanded to the extent ascertainable</b>
Criminal proceedings against the Promoter & Director	-	-
Criminal proceedings filed by the Promoter & Director	-	-
Other pending material litigation against the Promoter & Director	-	-
<b>Tax proceedings:</b>		
Direct Tax	9	41.22*
Indirect Tax	-	-
Other pending material litigation filed by the Promoter & Director	-	-
<b>Total</b>	<b>9</b>	<b>41.22</b>

\*Amount mentioned to the extent quantifiable. The amount may be subject to additional interest/other charges being levied by the concerned authorities which are unascertainable as on date of this Red Herring Prospectus. For further details, please refer to the chapter titled "**Outstanding Litigations and Material Developments**" on page 183 of this Draft Red Herring Prospectus.

**15. Any Adverse revision to our credit rating by rating agencies may adversely affect our ability to raise additional financing and the interest rates and other commercial terms at which such funding is available**

The credit rating issued by ICRA on February 27, 2020, was withdrawn because the data used for the rating was not comparable to that of companies with similar scale and capacity and did not align with the actual operational realities of our business. As a result, ICRA (Investment Information and Credit Rating agency) classified us as "**Issuer Not Cooperating**". Any adverse revision or downgrade of our credit rating by any rating agency could negatively impact our ability to raise additional financing, as it may increase the interest rates and alter the commercial terms under which such financing is available. This could lead to higher borrowing costs, limited access to capital, and a potential deterioration in our financial condition. Any such impact could adversely affect our business operations, growth prospects, and liquidity position.

**16. Our continued operations are critical to our business and are subject to operating risks such as breakdown or failure of machinery, disruption to power sources or any temporary shutdown of our manufacturing facilities, in the event of which, our business, results of operations, financial condition and cash flows can be adversely affected.**

Our manufacturing facility is subject to operating risks, such as the breakdown or failure of machinery, power supply or processes, performance below expected levels of efficiency, obsolescence of equipment or machinery, labour disputes, natural disasters, industrial accidents and the need to comply with the directives of relevant government authorities. Our customers rely significantly on the timely delivery of our products and our ability to provide an uninterrupted and timely supply of our products is critical to our business. We also require substantial electricity for our manufacturing facilities which is sourced from state electricity boards. Our customer relationships, business and financial results may be materially adversely affected by any disruption of manufacturing operations, including as a result of any of the factors mentioned above. However, no such incidents have been observed at Siltara plant, Raipur during the last three financial years.

**33. Any penalty or demand raised by statutory authorities in future may affect financial position of the Company.**

Our Company is engaged in the manufacturing business, which attracts tax liabilities such as Income Tax and Goods and Services Tax as per the applicable provisions of the Law. We are also subject to labour laws such as depositing of contributions with Provident Fund, Employee State Insurance and Professional Tax. Further, there have been certain delays in the filing of GST/EPF Returns but the company has now implemented strict monitoring and improved processes to ensure timely filing of returns in the future. Any demand or penalty raised by the concerned authority in future for late payments or non-payments for any previous year and current year will affect the financial position of the company. For instance, our company in past had delayed filing of GST/ EPF Returns due to operational & technical reasons and accordingly paid late fees and penalties on the same. Any demand or penalty raised by the concerned GST/EPF authority for such late filing may affect the financial position of the Company.

Below are the details of delay in GST

<b>Financial Year</b>	<b>Month</b>	<b>Due Date of Filing</b>	<b>Actual Date of Filing</b>	<b>Period of Delay (days)</b>	<b>Reason</b>
2019	February	20-Mar-2019	23-Mar-2019	3	Due to some technical reason, there were delays in Compiling the data properly
2019	August	20-Sep-2019	21-Sep-2019	1	
2019	October	20-Nov-2019	21-Nov-2019	1	
2019	November	23-Dec-2019	25-Dec-2019	2	
2020	January	22-Feb-2020	29-Feb-2020	7	
2020	February	22-Mar-2020	11-May-2020	50	
2020	March	22-Apr-2020	22-Aug-2020	122	
2020	April	22-May-2020	22-Aug-2020	92	
2020	May	12-Jul-2020	22-Aug-2020	50	
2020	June	22-Jul-2020	27-Aug-2020	36	
2020	July	22-Aug-2020	3-Sep-2020	12	
2020	October	22-Nov-2020	23-Nov-2020	1	
2020	November	22-Dec-2020	29-Dec-2020	7	
2020	December	22-Jan-2021	1-Feb-2021	10	
2021	March	20-Apr-2021	19-May-2021	29	
2021	April	20-May-2021	04-Jun-2021	15	
2021	June	20-Jul-2021	21-Jul-2021	1	Due to some technical reason, there were delays in Compiling the data properly
2022	February	20-Mar-2022	21-Mar-2022	1	
2022	March	20-Apr-2022	22-Apr-2022	2	

Below are the details of delay in EPF:

<b>Month-YY</b>	<b>Due date of payment</b>	<b>Actual date of payment</b>	<b>Period of delay(days)</b>	<b>Penalty paid date</b>	<b>Reason for delay</b>
June-2017	15 <sup>th</sup> July 2017	10 <sup>th</sup> August 2017	26	6 <sup>th</sup> October 2023	Incomplete documentation
November-2018	15 <sup>th</sup> December 2018	18 <sup>th</sup> December 2018	3	6 <sup>th</sup> October 2023	Technical errors
June-2019	15 <sup>th</sup> July 2019	20 <sup>th</sup> July 2019	5	6 <sup>th</sup> October 2023	Technical errors
January-2020	15 <sup>th</sup> February 2020	18 <sup>th</sup> February 2020	3	6 <sup>th</sup> October 2023	Technical errors
July-2022	15 <sup>th</sup> August 2022	30 <sup>th</sup> August 2022	15	6 <sup>th</sup> October 2023	Incomplete documentation
July-2022	15 <sup>th</sup> August 2022	30 <sup>th</sup> August 2022	15	6 <sup>th</sup> October 2023	Incomplete documentation
December-2022	15 <sup>th</sup> January 2023	16 <sup>th</sup> January 2023	1	6 <sup>th</sup> October 2023	Mismatched information
August-2023	15 <sup>th</sup> September 2023	18 <sup>th</sup> September 2023	3	6 <sup>th</sup> October 2023	Technical errors

## **CAPITAL STRUCTURE**

### **Shareholding of Promoters & Promoter Group**

Following are the details of pre and post Issue shareholding of persons belonging to the category “Promoters and Promoter Group”:

<b>Sr. No.</b>	<b>Names</b>	<b>Pre IPO</b>		<b>Post IPO</b>	
		<b>Shares Held</b>	<b>% Shares Held</b>	<b>Shares Held</b>	<b>% Shares Held</b>
<b>Promoters</b>					
1.	Anita Tradelinks Private Limited	5,325,000	37.71	5,325,000	[●]
2.	Buxom Trexim Private Limited	1,995,500	14.13	1,995,500	[●]
3.	Manoj Parasrampuria	849,850	6.02	8,49,850	[●]
4.	Manish Parasrampuria	625,100	4.43	6,25,100	[●]
5.	Shyam Sunder Parasrampuria	351,850	2.49	3,51,850	[●]
6.	Anubhav Parasrampuria	-	-	-	[●]
<b>Sub Total (A)</b>		<b>9,147,300</b>	<b>64.78%</b>	<b>9,147,300</b>	[●]
<b>Promoter Group</b>					
7.	Manoj Parasrampuria (HUF)	125,000	0.89	125,000	[●]
8.	Manish Parasrampuria (HUF)	272,500	1.93	272,500	[●]
9.	Shyam Sunder Parasrampuria (HUF)	1,627,000	11.52	1,627,000	[●]
10.	Krishna Devi Parasrampuria	695,500	4.93	695,500	[●]
11.	Shweta Parasrampuria	390,000	2.76	390,000	[●]
12.	Anita Parasrampuria	263,000	1.86	263,000	[●]
13.	Sheetal Singhania	92,500	0.66	92,500	[●]
14.	Indo Chains (Raipur) Private Limited	1,398,250	9.90	1,398,250	[●]
15.	ARP Complex Private Limited	110,000	0.78	110,000	[●]
<b>Sub Total (B)</b>		<b>4,973,750</b>	<b>35.22%</b>	<b>4,973,750</b>	[●]
<b>Total (A) + (B)</b>		<b>14,121,050</b>	<b>100.00%</b>	<b>14,121,050</b>	[●]

## **OBJECTS OF THE ISSUE**

### **Details of Utilization of Net Proceeds**

The details of utilization of the Net Proceeds are set forth herein below:

#### **1. Funding of Capital Expenditure requirements of our company towards setup of captive Power Plant at Siltara – Raipur**

Since 2020, our manufacturing operations for mild steel ingots, steel shots, grits, and other steel products have been temporarily shut down due to rising power costs. Despite having a well-defined production process and fully operational machinery at our facility, the economic environment has not supported continuous operations. The equipment used for producing mild steel shots and ingots are in working condition, and all necessary approvals are in place. The installed capacity for producing mild steel ingots and steel shots is 21,600 metric tonnes per annum. However, the production of steel ingots has been highly energy-intensive, leading to significantly higher electricity costs compared to the sponge iron unit. To address this challenge, we are planning to install a captive power plant at our premises using proceeds from the issue. This initiative will enable us to generate our own electricity, reduce reliance on external power sources, stabilize energy costs, and improve cost predictability. The power generated will be used across various divisions, including Ingots, Steel Shots & Grits, Sponge Iron, and the proposed Cast Iron Division.

We intend to allocate Rs. 2,300 lakhs from the net proceeds to finance the capital expenditures required for the captive power plant. The total project cost is Rs. 4,709.38 lakhs, with Rs. 2,300 lakhs covered by the proceeds and the remaining Rs. 2,409.38 lakhs to be funded through bank loans and internal accruals. The plant will be located at our existing facility in Siltara, Raipur, Chhattisgarh. We have received a cost estimate from ARK Engineering & Power Consultants (P) Ltd., based on their quotation dated August 10, 2024.

#### **Requirement of Fund**

##### **Project**

<b>1. Proposed Project and Type of Project</b>	1 * 5 MW Captive Power plant
<b>2. Plant Location</b>	Plot No. 106, Phase –II Industrial Growth Centre, Raipur – 493111, Chhattisgarh
<b>3. Technology</b>	Conventional steam Turbine operating in RANKINE cycle with 1 x 100 TPD WHR & 1 x 18 TPH AFBC Boilers

##### **Cost of the Project**

<b>Sr. No.</b>	<b>Particulars</b>	<b>Amount (Rs. in lakhs)</b>
1.	Land & Site Development	Nil
2.	Building & Civil Work	350.00
3.	Plant & Machinery & Other Ancillaries	3606.00
4.	Technical Consultancy Charges	35.00
	<b>Total Project Cost</b>	<b>3,991.00</b>
	<b>GST@18%</b>	<b>718.38</b>
	<b>Total Project Cost include GST</b>	<b>4,709.38</b>

*Note: The fund requirements for the capital expenditure for setting up captive power plant project at Siltara –Raipur are based on the TEV ( Techno Economic Viability”) report dated August 10<sup>th</sup>, 2024 issued by ARK Engineering & Power Consultants (P) Ltd*

#### **Means of Finance**

Our total funds requirements for the aforesaid project are estimated at Rs. 4,709.38 lakhs. As per the report mentioned above, the means of finance for the project is as under:-

<b>Means of Finance</b>	<b>Amount (Rs. in lakhs)</b>
Issue Proceeds	2,300.00
Term Loan secured towards Captive Power Plant	900.00
Internal Accruals	1,509.38
<b>Total Estimated cost</b>	<b>4,709.38</b>

Notes:

- a) *Our company has availed a term loan of Rs. 3,500 lakhs from HDFC Bank for the setup of a captive power plant, of which Rs. 900 lakhs has been utilized for the project at the Siltara plant.".*
- b) *M/s. A.C Bhuteria & Co. Chartered Accountants, our Statutory auditors, by way of their certificate dated September 07, 2024 has certified that the internal accruals as on September 07, 2024 is Rs. 3692.60 lakhs.*
- c) *Out of Rs. 3692.60 lakhs, Rs. 1,509.38 lakhs has been utilized by management for the setup of a captive power plant at Siltara Plant.*
- d) *The estimated cost for plant and machinery, along with other ancillaries related to the captive power plant, is Rs. 3,606 lakhs. Of this, Rs. 2,300 lakhs will be financed from the issue proceeds, while the remaining will be from covered through internal accruals and borrowings.*

## SECTION-V

### OUR BUSINESS

#### **Our Competitive Strengths**

##### **Stringent quality control mechanism ensuring standardized product quality**

The quality of raw materials and their relative proportions determine the quality of the final product and the efficiency of our rotary kilns. Thus, the quality of raw materials is of paramount importance to us in our sponge iron production process. To verify the same, we have established in-house testing laboratory at our sponge iron manufacturing facility, which is equipped with precision equipment's such as barometer, combustion furnace, desiccator, distillation plant, heating furnace, hot air oven, hot plate, measuring scale, measuring tape, muffle furnace, and other necessary tools, that is responsible for conducting tests and checks in respect of the quality of our key raw materials. We employ an extensive and stringent quality control mechanism at each stage of the manufacturing including check of raw materials, which are required to ensure that our finished product conforms with the exact requirement of our customers and successfully passes all validations and quality checks. We strive to produce sponge iron that would constitute high metallic iron content along with consistent chemical and physical characteristics, as per the requirements of our customers. We move our final products through trucks so as to preserve quality and reduce and/or prevent re-oxidation. Further, as a certification of the quality assurance, our Company has received ISO 9001:2015 for quality management systems, ISO 14001:2015 for environmental management systems and ISO 45001:2018 for occupational health

++h and safety management systems. We believe that our focus on quality of products has enabled us to sustain and grow our business model to benefit our customers.

#### **Our Products**

Name of the Product	Image	Description	End Use
Sponge Iron		Sponge Iron is the key raw material required to manufacture steel in both induction as well as electric arc furnace. Shri Hare Krishna has an installed capacity of producing over 30,000 metric tonnes of Sponge Iron annually.	Industrial Downstream steel manufacturing

#### **Plant & Machinery**

The major plant & machinery installed at our Siltara unit are owned by the company. The details are given below:

Kiln & Cooler Main Drive, Gear Box, Payloader and Tipper machine, Crusher with Vibratory sieve machine, Raw Material Handling system, FD Cooler, Conveyor system & Screening system, Weigh bridge machine, Electrical & Machinery Equipment, Laboratory Equipment and all other accessories.

#### **Human Resources**

We believe that our employees are key contributors to our business success, and therefore, we focus on attracting and retaining the best talent. Our goal is to recruit the necessary talent, facilitate the integration of employees into the company, and encourage skill development to support our performance and operational growth. As of June 30, 2024, our company employs 79 full time employees at various levels within the organization. The details are given below:-

Department/Team	Number of Employees
-----------------	---------------------

Mechanical Maintenance	14
Electrical Maintenance	13
Procurement & Production	10
Housekeeping	9
Automobile	9
Accounts & Finance	7
Human Resource & Administration	4
Quality Control	3
Dispatch Team	3
Civil Team	2
Store Department	2
Purchase Department	1
Information Technology	1
Sales Department	1
<b>Total</b>	<b>79</b>

### **Sales & Marketing**

Our Sales and Marketing team keeps a track of new leads and stay in touch with our existing customers when new developments are foreseen at their end. There is continuous interaction with the product development team at customer end so as to understand the potential business possibilities in near future and the opportunities where we can be sharing responsibilities for new product component support. Our marketing team along with our management through their experience and good rapport with customers owing to timely and quality delivery of service plays an instrumental role in creating and expanding the sales network of our Company. The Company primarily utilizes brokers registered under the Steel Chamber platform as its distribution network. These brokers play a key role in facilitating the distribution of our products to various customers and markets. In order to maintain good relation with our customers, our promoters and our marketing team regularly interacts with them and focuses on gaining an insight into the additional needs of our customers. Our prime consideration for customer selection is timely payments and consistency in purchases.

## KEY INDUSTRY REGULATIONS AND POLICIES

### A. CORE BUSINESS LAWS

#### **Industrial (Development and Regulation) Act, 1951**

This Act has been liberalized under the New Industrial Policy dated July 24th, 1991, and all industrial undertakings have been made exempt from licensing except for certain industries such as distillation and brewing of alcoholic drinks, cigars and cigarettes of tobacco and manufactured tobacco substitutes, all types of electronic aerospace and defence equipment, industrial explosives including detonating fuses, safety fuses, gun powder, nitrocellulose and matches and hazardous chemicals and those reserved for the small scale sector. An industrial undertaking, which is exempt from licensing, is required to file an Industrial Entrepreneurs Memorandum ("IEM") with the Secretariat for Industrial Assistance, Department of Industrial Policy and Promotion, Ministry of Commerce and Industry, Government of India, and no further approvals are required.

#### **National Steel Policy, 2017**

The NSP 2017 seeks to enhance domestic steel production with focus on creating a technologically advanced and globally competitive steel industry in India that promotes economic growth. The NSP 2017 aims to create an environment for attaining self-sufficiency in steel production by providing policy support and guidance to private manufacturers. The intent is to strengthen the research and development of national importance in the iron and steel sector by utilizing tripartite synergy among industry, national research and development laboratories and academic institutions. The NSP 2017 covers, *inter alia*, steel demand, steel capacity, raw materials, including iron ore, iron ore pellets, manganese ore, chromite ore, Ferro-alloys, land, water, power, infrastructure and logistics, and environmental management.

#### **National Mineral Policy 2019**

The National Mineral Policy (NMP) 2019 emphasizes efficient, sustainable, and transparent management of minerals, which extends to their storage as raw materials. It aims to streamline practices for handling, storing, and transporting minerals to reduce wastage, environmental impact, and pilferage. For companies engaged in mineral storage, NMP 2019 mandates adherence to environmental safeguards, responsible use of resources, and compliance with safety standards. The policy also supports the use of technology to monitor and manage mineral stockpiles effectively, ensuring that storage practices align with sustainable development goals and contribute to a stable, accountable mineral supply chain.

#### **Mines and Minerals (Development and Regulation) Act, 1957 ("MMDR Act")**

The MMDR Act was enacted for the development and regulation of mines and minerals under the control of the union of India. The MMDR Act stipulates that no person is permitted to undertake any reconnaissance, prospecting or mining operations in any area unless such activity is undertaken in accordance with the terms and conditions of the reconnaissance permit or a prospecting licence or an exploration license or a mining lease granted under the MMDR Act. The MMDR Act also grants State Governments the power to *inter-alia* make rules regulating: (i) the grant of leases in relation to quarries, mining or other mineral concessions in respect of minor minerals (i.e., minerals identified or notified as minor minerals in the MMDR Act); and (ii) the prevention of illegal mining, transportation and storage of minerals and any purposes connected therewith.

#### **Minerals conservation and development rules, 1988**

The Minerals Conservation and Development Rules, 1988, is an Indian regulatory framework established to promote the sustainable management of mineral resources. This set of rules governs the exploration, extraction, and processing of minerals to ensure their efficient use and conservation. It mandates that mining operations adhere to environmental and safety standards, including proper waste management, land reclamation, and adherence to prescribed methods of mining to minimize ecological impact. The goal is to balance mineral development with environmental protection and resource conservation.

#### **The Orissa Mineral (Prevention of Theft, Smuggling and Illegal Mining, Possession, Storage, Trading and Transportation) Rules, 2007**

covered under section 23 (C) of the Mines and Minerals (Development and Regulation) Act, 1957 which grant power to state government to make rules for preventing illegal mining, possession, trading, transportation and storage of minerals. This Rules aim to regulate and prevent unauthorized activities related to mineral resources in the state of Orissa, India. The Rule includes provisions for obtaining licenses, permits, and documentation to ensure compliance with legal standards and prevent theft, smuggling, and illegal mining. The rules also outline penalties and enforcement measures to deter and punish violations, aiming to safeguard mineral resources and promote responsible mining practices in the region.

### **Contract Labour (Regulation and Abolition) Act, 1970**

The Contract Labour (Regulation and Abolition) Act, 1970 is a crucial Indian legislation designed to regulate the employment of contract labourers across various industries. Its primary objective is to prevent exploitation of contract workers by ensuring they receive fair wages, decent working conditions, and essential amenities such as canteens, restrooms, and first aid facilities. The Act also mandates that employers obtain licenses or register establishments engaging contract labour, thereby ensuring compliance with its provisions. Additionally, it provides for the abolition of contract labour in certain types of work deemed to be of a perennial nature, aiming to secure the rights and welfare of contract labourers in India.

### **The Bureau of Indian Standards Act, 2016**

The BIS (Bureau of Indian Standards) certification is mandatory for certain products to prove the compliance of safety standards through standardization, certification, and testing. It ensures the product quality and reliability by verifying safety requirements and minimizing health hazards to consumers. Most recently on July 22, 2019, the Indian Ministry of Steel announced extensions of the certification scheme for steel products, most becoming effective immediately. It is also possible that the BIS certification will be required for certain components of products (for example, batteries). In such a case, the component certification needs to be completed before the process of actual product certification can be started. IS 4606 of 1983 is required for specification for steel shots for use in foundries.

### **Steel and Steel Products (Quality Control) Order, 2020 (Applicable as per Section 16 of BIS Act, 2016)**

The Steel and Steel Products (Quality Control) Order, 2020 (“QC Order”) was notified by the Ministry of Steel, Government of India, to vide Gazette Notification No. S.O 4637(E) dated December 22, 2020 to bring certain steel products under mandatory BIS certification. All manufacturers of steel and steel products are required to apply for certification and ensure compliance with the QC Order. The QC Order further provides that every steel and steel product stated therein shall bear the standard mark under a license from BIS, as provided in Bureau of Indian Standards (Conformity Assessment) Regulations.

### **The Legal Metrology Act, 2009 (the “Legal Metrology Act”) and the Legal Metrology (Packaged Commodities) Rules, 2011 (the “Legal Metrology Rules”)**

The Legal Metrology Act, along with the Legal Metrology Rules, establishes and enforces standards of weights and measures, regulates trade and commerce in weights, measures and other goods which are sold or distributed by weight, measure or numbers. Any transaction relating to goods or a class of goods shall be as per the weight, measurements or numbers prescribed by the Legal Metrology Act. The Legal Metrology Act prohibits the manufacture, packing, selling, importing, distributing, delivering, offer for sale of any pre-packaged commodity if such does not adhere to the standard regulations set out. The Legal Metrology Rules are ancillary to the Legal Metrology Act and set out to define various manufacturing and packing terminology. It lays out specific prohibitions where manufacturing, packing, selling, importing, distributing, delivering, offering for sale would be illegal and requires that any form of advertisement where the retail sale price is given must contain a net quantity declaration. Circumstances which are punishable are also laid out in the Legal Metrology Rules.

### **The Factories Act, 1948**

A factory is a building or group of buildings where people work with machinery to make goods. The primary goal of the Factories Act is to safeguard employees in a factory from industrial and occupational risks. This Act gives the owner or occupier of a factory a particular responsibility to secure and protect employees from employment in conditions harmful to their health and safety in order to safeguard workers. It is stated in the Act that the purpose of the Factories Act is to amend and consolidate the legal framework governing factory labour.

The Act is applicable to any factory whereon ten or more workers are working, or were working on any day of the preceding twelve months, and in any part of which a manufacturing process is being carried on with the aid of power, or is ordinarily so carried on, or whereon twenty or more workers are working, or were working on any day of the preceding twelve months, and in any part of which a manufacturing process is being carried on without the aid of power, or is ordinarily so carried on; but this does not include a mine, or a mobile unit belonging to the armed forces of the union, a railway running shed or a hotel, restaurant or eating place.

The Factories Act, 1948 is a beneficial legislation. The aim and object of the Act is essentially to safeguard the interests of workers, stop their exploitation and take care of their safety, hygiene and welfare at their places of work. It casts various obligations, duties and responsibilities on the occupier of a factory and also on the factory manager. Amendments to the Act and court decisions have further extended the nature and scope of the concept of occupier, especially vis-a-vis hazardous processes in factories.

### **Electricity Act, 2003**

The Electricity Act, 2003 ("Electricity Act") was enacted to regulate the generation, transmission, distribution, trading and use of electricity by authorising a person to carry on the above acts either by availing a license or by seeking an exemption under the Electricity Act. Additionally, the Electricity Act states no person other than Central Transmission Utility or State Transmission Utility, or a licensee shall transmit or use electricity at a rate exceeding 250 watts and 100 volts in any street or place which is a factory within the meaning of the Factories Act, 1948 or a mine within the meaning of the Mines Act, 1952 or any place in which 100 or more persons are ordinarily likely to be assembled. An exception to the said rule is given by stating that the applicant shall apply by giving not less than 7 days' notice in writing of his intention to the Electrical Inspector and to the District Magistrate or the Commissioner of Police, as the case may be, containing the particulars of electrical installation and plant, if any, the nature and purpose of supply of such electricity. The Electricity Act also lays down the requirement of mandatory use of meters to regulate the use of electricity and authorises the Commission so formed under the Electricity Act, to determine the tariff for such usage. The Electricity Act also authorises the State Government to grant subsidy to the consumers or class of consumers it deems fit from paying the standard tariff required to be paid.

### **The Indian Boilers Act, 1923**

The Indian Boilers Act-1923 was enacted with the objective to provide mainly for the safety of life and Property of persons from the danger of explosions of steam boilers and for achieving uniformity in registration and inspection during operation and maintenance of boilers in India. The act defines a boiler as any closed vessel exceeding a specified capacity that is used for generating steam under pressure. It covers all boilers used in industries, power plants, and other establishments. Boilers must be inspected and certified by a competent authority before they can be operated. Regular inspections are mandated to ensure ongoing compliance with safety standards. The act outlines the responsibilities of boiler owners and operators to maintain boilers in safe working condition. It includes provisions for periodic maintenance and repairs.

### **The Indian Boiler Regulations, 1950**

The Indian Boiler Regulations (IBR), 1950, are a set of rules framed under the Indian Boilers Act, 1923, detailing technical standards for the design, materials, construction, inspection, and certification of boilers in India. These regulations ensure that boilers used within the country meet specified safety and quality standards to prevent accidents and enhance operational safety. The IBR covers all aspects of boiler manufacturing, from material testing and welding procedures to the qualifications of personnel involved in boiler-related tasks. Compliance with IBR is mandatory, and boilers must be inspected and certified by authorized inspectors to ensure they are fit for operation, thereby safeguarding workplace safety in industries using boilers.

### **The Chhattisgarh Fire and Emergency Services Act, 2018**

The Chhattisgarh Fire and Emergency Services Act, 2018, is a legislative framework designed to enhance fire safety and emergency response in the state of Chhattisgarh. The Act establishes guidelines for fire prevention, safety measures, and the operation of fire services, requiring all commercial and industrial properties to obtain a Fire No Objection Certificate (NOC) to ensure compliance with safety standards. It empowers the fire department to conduct inspections, enforce regulations, and impose penalties for violations. The Act aims to protect lives and property from fire hazards by promoting effective fire safety practices and ensuring a coordinated emergency response to fire incidents.

## **OUR MANAGEMENT**

### **Brief Profile of Directors:**

Shyam Sunder Parasrampuria is the Non-Executive Director of our Company. He possesses around 46 years of experience in the steel industry, with a focus on the manufacturing of iron and sponge. He is a Graduate.

## OUR PROMOTERS & PROMOTER GROUP

### OUR PROMOTERS:

The Promoters of our Company are Shyam Sunder Parasrampuria, Manoj Parasrampuria, Manish Parasrampuria, Anubhav Parasrampuria, Anita Tradelinks Private Limited and Buxom Trexim Private Limited.

	<p><b>Anubhav Parasrampuria- Whole Time Director</b> Anubhav Parasrampuria, aged 26 years, is one of the Promoters and is also the Whole Time Director of the Company. For Complete profile of Anubhav Parasrampuria, i.e., his date of birth, residential address, educational qualifications, experience in business or employment, business and financial activities, special achievements, positions/posts held in the past and other directorships, see “Our Management” beginning on page 133 of this Draft Red Herring Prospectus.</p> <p><b>Other ventures of our Promoters</b> – Except as disclosed below and set out in the chapter titled ‘Our Management’, our Promoters are not involved with any other venture, as a shareholder/ stakeholder, proprietor, partner, promoters or director.</p> <p><b>HUF:</b> Manish Parasrampuria HUF</p> <p><b>Firm:</b> NA</p> <p><b>Permanent Account Number:</b> ECWPP3251G.</p> <p>Anubhav Parasrampuria not hold any equity share capital of our company.</p>
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### Confirmations/Declarations:

In relation to our Individual Promoter Shyam Sunder Parasrampuria, Manoj Parasrampuria, Manish Parasrampuria and Anubhav Parasrampuria, our Company confirms that the PAN, Bank Account Numbers, Passport Number, Aadhaar Card Number and Driving License number shall be submitted to stock exchange at the time of filing of Draft Red Herring Prospectus.

In relation to our Corporate Promoters Anita Tradelinks Private Limited and Buxom Trexim Private Limited, our Company confirms that the PAN, Bank Account Numbers, Corporate Registration Number, Address of the registrar of companies where our Corporate Promoters are Registered shall be submitted to stock exchange at the time of filing of this Draft Red Herring Prospectus.

### Experience of Promoters in the line of business

Our Individual Promoter Shyam Sunder Parasrampuria, Manoj Parasrampuria, Manish Parasrampuria have an experience of more than 32 years in the metal and steel Industry while Anubhav Parasrampuria has 7 years of experience in the same field. The Company shall also endeavor to ensure that relevant professional help is sought as and when required in the future.

### OUR PROMOTER GROUP

In addition to the Promoters named above, the following natural persons and entities forms part of our Promoter Group:

1. Natural Persons who are part of the Promoter Group:

Relationship	Name of the Relatives			
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	<b>Shyam Sunder Parasrampuria</b>	<b>Manoj Parasrampuria</b>	<b>Manish Parasrampuria</b>	<b>Anubhav Parasrampuria</b>
Father	Late Hari Kishan Parasrampuria	Shyam Sunder Parasrampuria	Shyam Sunder Parasrampuria	Manish Parasrampuria
Mother	Late Manbhari Devi	Krishna Devi Parasrampuria	Krishna Devi Parasrampuria	Shweta Parasrampuria
Spouse	Krishna Devi Parasrampuria	Anita Parasrampuria	Shweta Parasrampuria	NA
Brother	Banarsilal Parasrampuria Bhagwati Prasad Parasrampuria	Manish Parasrampuria	Manoj Parasrampuria	Akshat Parasrampuria
Sister	Geeta Saraf Late Durga Saraf Late Bhagwati Agarwal	Sheetal Singhania	Sheetal Singhania	NA
Son	Manoj Parasrampuria Manish Parasrampuria	Abhishek Parasrampuria	Anubhav Parasrampuria Akshat Parasrampuria	NA
Daughter	Sheetal Singhania	Anushka Parasrampuria	NA	NA
Spouse's Father	Late Tejpal Saroagi	Kamal Kumar Agarwal	Late Radhe Shyam Diwan	NA
Spouse's Mother	Late Sarbati Devi Saroagi	Manju Devi Agarwal	Late Pushpa Devi Diwan	NA
Spouse's Brother	Prabhat Kumar Saroagi Bimal Saroagi	Amit Agarwal Anil Kumar Agarwal	Manoj Diwan Late Permanand Diwan	NA
Spouse's Sister	Late Angoori Devi Kejriwal Late Draupati Bathwal	NA	Shalini Garodia Ragini Agarwal	NA

## **SECTION VII- LEGAL AND OTHER INFORMATION**

### **OUTSTANDING LITIGATION AND MATERIAL DEVELOPMENTS**

#### **A. LITIGATION INVOLVING THE COMPANY**

##### **(a) Criminal proceedings against the Company**

As on the date of this Draft Red Herring Prospectus, there are no outstanding criminal proceedings initiated against the Company.

### **GOVERNMENT AND OTHER APPROVALS**

#### **III. BUSINESS AND OPERATIONS RELATED APPROVALS**

<b>Sl. No.</b>	<b>Name of Registration</b>	<b>Registration/License No</b>	<b>Applicable Law</b>	<b>Issuing Authority</b>	<b>Date of Issue</b>	<b>Validity</b>
8.	Approval for establishment of 2.0 MW Capacity Biomass based power generation plant	4830/CREDA/BMPP/SE (RE-II)/2024-25	Society Act 1973	Chhattisgarh State Renewable Energy Development Agency (CREDA)	August 29, 2022  July 05, 2024 (Renewal Date)	July 31, 2025
16.	Trading License under form D for P2-Processing ,end-use and sale of residuals Outside the State	NLD17517/2024	Mines And Minerals (Development And Regulation) Act, 1957	Dy. Director of Mines, Keonjhar	October 29, 2024	October 28, 2029

## **OUR GROUP COMPANIES**

As per the SEBI (ICDR) Regulations, 2018, for the purpose of identification of Group Company, our Company has considered those companies as our Group Company with which there were related party transactions as per the Restated Financial Statements of our Company in any of the last three financial years and other Companies as considered material by our Board. Further, pursuant to a resolution of our Board dated August 26, 2024 for the purpose of disclosure in relation to Group Company in connection with the Issue, a company shall be considered material and disclosed as a Group Company if such company fulfils both the below mentioned conditions:

- a. the companies with which there were related party transactions (in accordance with AS-18), as disclosed in the Restated Financial Statements (“Restated Financial Statements”); or
- b. if such company fulfills both the below mentioned conditions: -
  - i) Such company that forms part of the Promoter Group of our Company in terms of Regulation 2(1)(pp) of the SEBI (ICDR) Regulations 2018; and
  - ii) Where the Company has entered into one or more transactions with such company in preceding fiscal or audit period as the case may be exceeding 10.00% of total revenue of the company as per Restated Financial Statements.

Based on the above, the following Companies are identified as our Group Companies:

1. Indo Chains (Raipur) Private Limited
2. ARP Complex Private Limited
3. Special Mines & Minerals Private Limited

Details of our Group Companies:

### ***Indian Companies***

#### **1. Indo Chains (Raipur) Private Limited.**

Indo Chains (Raipur) Private Limited was incorporated on October 26, 2009 as a private limited company under the Companies Act, 1956 pursuant to a certificate of incorporation issued by the Registrar of Companies, West Bengal. The Company is primarily engaged in manufacturing, designing, engineering of heavy-duty material handling chains and accessories catering to various industries such as cement, power, steel and paper etc. The major products manufactured are Re-claimer Chains, Elevator Chains, Drag Chains, Pan Conveyor Chains, etc. along with the required accessories for these chains like sprocket, pans, buckets, Rim Segments etc.

<b>CIN</b>	U28112WB2009PTC139030
<b>PAN</b>	AACCI1580N
<b>Registered Office</b>	126, Mahatma Gandhi Road Ground Floor, Kolkata, West Bengal, India, 700007

#### **2. ARP Complex Private Limited**

ARP Complex Private Limited was incorporated on December 14, 2004 as a private limited company under the Companies Act, 1956 pursuant to a certificate of incorporation issued by the Registrar of Companies, West Bengal. The Company offer a range of plant and machinery and vehicles for rent, enabling businesses to access the equipment they need without significant capital investments.

<b>CIN</b>	U27200WB2004PTC100705
<b>PAN</b>	AAECA9900A
<b>Registered Office</b>	126, Mahatma Gandhi Road Ground floor, Kolkata, West Bengal, India, 700007

### **3. Special Mines & Minerals Private Limited**

Special Mines & Minerals Private Limited was incorporated on March 01, 2011 as a private limited company under the Companies Act, 1956 pursuant to a certificate of incorporation issued by the Registrar of Companies, West Bengal. The Company is established to engage in the extraction, processing, and beneficiation of minerals and metals. This includes operating mines and quarries to obtain a variety of materials such as ores, coal, limestone, and metals (e.g., iron, copper, gold). Additionally, the Company plans to manufacture and trade in a wide range of metal products, including iron, steel, alloys, and fabricated goods. It also intends to set up processing plants and undertake metal treatment processes like smelting, rolling, and galvanization. However, the Company has not yet commenced its business activities.

## **ISSUE PROCEDURE**

### **ISSUANCE OF A CONFIRMATION NOTE (“CAN”) AND ALLOTMENT IN THE ISSUE:**

1. Upon approval of the basis of allotment by the Designated Stock Exchange, the BRLM or Registrar to the Issue shall send to the SCSBs a list of their Bidders who have been allocated Equity Shares in the Issue.
2. The Registrar will then dispatch a CAN to their Bidders who have been allocated Equity Shares in the Issue. The dispatch of a CAN shall be deemed a valid, binding and irrevocable contract for the Bidder

## DECLARATION

I certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines issued by the Government of India, or the regulations or guidelines issued by SEBI, established under section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in this Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, the Securities Contracts (Regulation) Act, 1956, as amended, the Securities and Exchange Board of India Act, 1992, as amended or the rules, regulations or guidelines issued thereunder, as the case may be. I further certify that all the statements in this Addendum are true and correct.

### SIGNED BY THE BOARD OF DIRECTORS OF OUR COMPANY:

Name & Designation	Signature
Manoj Parasrampuria Chairman & Managing Director DIN: 00469018	Sd/-

Date: January 09, 2025

Place: Raipur

## DECLARATION

I certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines issued by the Government of India, or the regulations or guidelines issued by SEBI, established under section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in this Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, the Securities Contracts (Regulation) Act, 1956, as amended, the Securities and Exchange Board of India Act, 1992, as amended or the rules, regulations or guidelines issued thereunder, as the case may be. I further certify that all the statements in this Addendum are true and correct.

### SIGNED BY THE BOARD OF DIRECTORS OF OUR COMPANY:

Name & Designation	Signature
Anubhav Parasrampura Whole Time Director DIN: 10781450	Sd/-

Date: January 09, 2025

Place: Raipur

## DECLARATION

I certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines issued by the Government of India, or the regulations or guidelines issued by SEBI, established under section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in this Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, the Securities Contracts (Regulation) Act, 1956, as amended, the Securities and Exchange Board of India Act, 1992, as amended or the rules, regulations or guidelines issued thereunder, as the case may be. I further certify that all the statements in this Addendum are true and correct.

### SIGNED BY THE BOARD OF DIRECTORS OF OUR COMPANY:

Name & Designation	Signature
Manish Parasrampuria Non-Executive Director DIN: 00469033	Sd/-

Date: January 09, 2025

Place: Raipur

## DECLARATION

I certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines issued by the Government of India, or the regulations or guidelines issued by SEBI, established under section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in this Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, the Securities Contracts (Regulation) Act, 1956, as amended, the Securities and Exchange Board of India Act, 1992, as amended or the rules, regulations or guidelines issued thereunder, as the case may be. I further certify that all the statements in this Addendum are true and correct.

### SIGNED BY THE BOARD OF DIRECTORS OF OUR COMPANY:

Name & Designation	Signature
Shyam Sunder Parasmampuria Non-Executive Director DIN: 00469058	Sd/-

Date: January 09, 2025

Place: Raipur

## DECLARATION

I certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines issued by the Government of India, or the regulations or guidelines issued by SEBI, established under section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in this Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, the Securities Contracts (Regulation) Act, 1956, as amended, the Securities and Exchange Board of India Act, 1992, as amended or the rules, regulations or guidelines issued thereunder, as the case may be. I further certify that all the statements in this Addendum are true and correct.

### SIGNED BY THE BOARD OF DIRECTORS OF OUR COMPANY:

Name & Designation	Signature
Gaurav Mehta Independent Director DIN: 06803209	Sd/-

Date: January 09, 2025

Place: Raipur

### **DECLARATION**

I certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines issued by the Government of India, or the regulations or guidelines issued by SEBI, established under section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in this Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, the Securities Contracts (Regulation) Act, 1956, as amended, the Securities and Exchange Board of India Act, 1992, as amended or the rules, regulations or guidelines issued thereunder, as the case may be. I further certify that all the statements in this Addendum are true and correct.

### **SIGNED BY THE BOARD OF DIRECTORS OF OUR COMPANY:**

<b>Name &amp; Designation</b>	<b>Signature</b>
Jonu Agrawal Independent Director DIN: 10738552	Sd/-

Date: January 09, 2025

Place: Raipur

## DECLARATION

I certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines issued by the Government of India, or the regulations or guidelines issued by SEBI, established under section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in this Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, the Securities Contracts (Regulation) Act, 1956, as amended, the Securities and Exchange Board of India Act, 1992, as amended or the rules, regulations or guidelines issued thereunder, as the case may be. I further certify that all the statements in this Addendum are true and correct.

### SIGNED BY THE COMPANY SECRETARY OF OUR COMPANY:

Name & Designation	Signature
Rashmeet Kaur Company Secretary & Compliance Officer	Sd/-

Date: January 09, 2025

Place: Raipur

## DECLARATION

I certify and declare that all relevant provisions of the Companies Act, 2013 and the rules, regulations and guidelines issued by the Government of India, or the regulations or guidelines issued by SEBI, established under section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in this Draft Red Herring Prospectus is contrary to the provisions of the Companies Act, the Securities Contracts (Regulation) Act, 1956, as amended, the Securities and Exchange Board of India Act, 1992, as amended or the rules, regulations or guidelines issued thereunder, as the case may be. I further certify that all the statements in this Addendum are true and correct.

### SIGNED BY THE CHIEF FINANCIAL OFFICER OF OUR COMPANY:

Name & Designation	Signature
Abhishek Parasrampuria CFO	Sd/-

Date: January 09, 2025

Place: Raipur