SURANI
STEEL TUBES LIMITED

NOTICE

Notice is hereby given that an Extra-Ordinary General Meeting of Surani Steel Tubes Limited will be held on Friday, October 30, 2026, at 11:00 A.M. (IST) through Video Conferencing and Other Audio-Visual Means, to transact the following Special Businesses:

1. **INCREASE IN AUTHORISED SHARE CAPITAL OF THE COMPANY AND CONSEQUENT AMENDMENT IN CAPITAL CLAUSE OF THE MEMORANDUM OF ASSOCIATION OF THE COMPANY**

   To consider and, if thought fit, to pass the following resolution as an Ordinary Resolution:

   "RESOLVED THAT pursuant to the provisions of Sections 13, 61, & 64 and other applicable provisions, if any, of the Companies Act, 2013, (including any statutory modification(s) and re-enactment(s) thereof for the time being in force) and the rules framed thereunder, consent of the Members be and is hereby accorded to increase the Authorised Share Capital of the Company from the present share capital of Rs. 25,00,00,000/- (Rupees Twenty-Five Crore Only) consisting of 2,50,00,000 (Two Crore Fifty Lakh) Equity Shares of Rs. 10/- (Rupees Ten Only) each to Rs. 26,00,00,000/- (Rupees Twenty-Six Crore Only) consisting of 2,60,00,000 (Two Crore Sixty Lakh) Equity Shares of Rs. 10/- (Rupees Ten Only) each.

   RESOLVED FURTHER THAT the Memorandum of Association of the Company be and is hereby altered by substituting the existing Clause V thereof by the following new Clause V:

   "The Authorised Share Capital of the Company is Rs. 26,00,00,000/- (Rupees Twenty-Six Crore Only) consisting of 2,60,00,000 (Two Crore Sixty Lakh) Equity Shares of Rs. 10/- (Rupees Ten Only) each."

   RESOLVED FURTHER THAT the Board of Directors of the Company (hereinafter referred to as the Board, which term shall include any Committee constituted by the Board or any person(s) authorised by the Board to exercise the powers conferred on the Board by this resolution) and/or the Company Secretary of the Company, be and is hereby severally authorised to take such steps as may be necessary and generally to do all acts, deeds, matters and things that may be necessary, proper, expedient or incidental for the purpose of giving effect to the above resolution(s), on behalf of the Company."

2. **CHANGE IN NAME OF THE COMPANY AND CONSEQUENTIAL AMENDMENT TO THE MEMORANDUM AND ARTICLES OF ASSOCIATION OF THE COMPANY**

   To consider, and, if thought fit, to pass, with or without modification(s) the following resolution as a **Special Resolution:**

   "RESOLVED THAT pursuant to the provisions of Section(s) 4, 5, 13, 15 and other applicable provisions, if any, of the Companies Act, 2013 read with the Companies (Incorporation) Rules, 2014 [including any statutory modification(s) or re-enactment(s) thereof for the time being in force], Regulation 45 of the SEBI Listing Regulations (as amended up to date), the provisions of the Memorandum and Articles of Association of the Company, any other applicable law(s), rule(s), regulation(s), guideline(s), circular(s) for the time being in force and subject to all other necessary approvals, consents, sanctions and permissions as may be required under applicable laws including that of the Central Government (Ministry of Corporate Affairs or MCA), Stock Exchanges and any

other appropriate regulatory/statutory authorities/departments as may be necessary, the consent of the Members of the Company be and is hereby accorded to change the name of the Company from "'Surani Steels Tubes Limited" to **"'Singlon Limited".**

RESOLVED FURTHER THAT upon issuance of the fresh certificate of incorporation by the Registrar of Companies consequent upon change of name, the Memorandum of Association and the Articles of Association, and other relevant documents, papers and places, as applicable shall stand altered as below:

I. The Name of the Company is **'Singlon Limited'**

RESOLVED FURTHER THAT the Board of Directors of the Company (hereinafter referred to as the "Board", which term shall be deemed to include any of its duly constituted Committee or any officers / executives / representatives / legal counsels / advisors / consultants and / or any other person so authorized by the Board) and/or Company Secretary of the Company, severally and jointly, be and are hereby authorized, on behalf of the Company to perform all such acts, deeds, matters and things as may be required or deemed necessary or incidental thereto including signing and filing of all the e-forms and other documents with the statutory / regulatory authorities, and to execute all such forms, papers, deeds, documents, instruments, writings as may be necessary including appointing attorneys or authorized representatives under appropriate Letter(s) of Authority to appear before the applicable offices of the MCA and other regulatory authorities, to file required documents and information to the Stock Exchanges and such other authority(s) as may be required from time to time and to do all such acts, deeds and things as may be required in this connection including the power to delegate all or any of the powers conferred herein, or otherwise as deemed fit by the Board to be in the best interest of the Company in order to give effect to this Resolution without being required to seek further consent or approval of the Members or otherwise."

3. ISSUANCE OF UP TO 98,00,000 (NINETY-EIGHT LAKH) FULLY CONVERTIBLE WARRANTS ("WARRANTS") ON PREFERENTIAL BASIS TO THE ALLOTTEES, COMPRISING A "PROMOTER GROUP" ENTITY AND "NON-PROMOTER, PUBLIC CATEGORY"

To consider and if thought fit, to pass with or without modification(s) the following resolution as a **Special Resolution**:

"RESOLVED THAT pursuant to the provisions of Sections 23, 42, 62(1)(c) and other applicable provisions, if any, of the Companies Act, 2013 (hereinafter referred to as the "Companies Act") read with the Companies (Prospectus and Allotment of Securities) Rules, 2014, as amended and the Companies (Share Capital and Debentures) Rules, 2014, as amended and other relevant rules made there under including any statutory modification(s) thereto or re-enactment thereof for the time being in force, enabling provisions in Memorandum and Articles of Association of the Company, provisions of the listing agreement executed with the Stock Exchanges, where the shares of the Company are listed ("Stock Exchange"), and in accordance with the guidelines, rules and regulations of the Securities and Exchange Board of India ("SEBI"), as amended including the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("SEBI ICDR Regulations"), the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations"), as amended, the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 ("Takeover Regulations") as amended, the Foreign Exchange Management Act, 1999 as amended and in accordance with other applicable rules, regulations, circulars, notifications, clarifications and guidelines issued thereon, from time to time, by the Reserve Bank of India ("RBI"), Ministry of Corporate Affairs, SEBI and / or any other competent authorities, and subject to the

approvals, consents, permissions and / or sanctions, as may be required from the Government of India, SEBI, RBI, Stock Exchange, and any other relevant statutory, regulatory, governmental authorities or departments, institutions or bodies and subject to such terms, conditions, alterations, corrections, changes, variations and / or modifications, if any, as may be prescribed by any one or more or all of them in granting such approvals, consents, permissions and / or sanctions and which may be agreed to by the Board of Directors of the Company (hereinafter referred to as the "Board" which term shall be deemed to include any Committee, which the Board has constituted or may hereafter constitute, to exercise one or more of its powers, including the powers conferred hereunder), consent of the members of the Company be and is hereby accorded to the Board to create, issue, offer and allot, on a preferential basis, in one or more tranches, up to 98,00,000 (Ninety-Eight Lakh) Fully Convertible Warrants Convertible into equivalent number of fully paid up equity share of the Company having face value of Rs. 10/- (Rupees Ten Only), to the allottees, comprising a "Promoter Group" entity and "Non-Promoter, Public Category', at an issue price of Rs. 102/- (Rupees One Hundred and Two Only) per warrant higher than the floor price determined in accordance with the provisions of Chapter V of SEBI ICDR Regulations, payable in cash for aggregating amount of up to 99,96,00,000/- (Rupees Ninety-Nine Crore Ninety-Six Lakh Only), on such further terms and conditions as detailed herein below, to the below mentioned person ("Proposed Allottee"):

S. No.	Name of the Proposed Allottees	Warrants to be allotted on Preferential basis Maximum Quantity for the respective allottee
A	**Promoter/Promoter Group**	
1.	M/s Himani Steels Private Limited	62,03,000
	Total (A)	**62,03,000**
B	**Non-Promoter, Public Category**	
1.	Ajay Pandey	5,00,000
2.	Rajesh Agarwal	2,75,000
3.	Shiv Sehgal	2,00,000
4.	Vikram Bansal	2,00,000
5.	Dharmendra Narpatlal Zaveri	1,50,000
6.	Uma Rani	1,50,000
7.	Rohit D Gupta	1,00,000
8.	Amit Kumar	1,00,000
9.	Raghav Agarwal	1,00,000
10.	Vinay Arunkumar Sanklecha	1,00,000
11.	Rishi Pahwa	1,00,000
12.	Mandeep Singh Pahwa	1,00,000
13.	Sri Radhaballabh Securities Private Limited	1,00,000
14.	Shubham Agarwal	1,00,000
15.	Vanita Behal	1,00,000
16.	Naveen Behal	1,00,000
17.	Shreya Aggarwal	1,00,000
18.	Amit Garg	1,00,000
19.	Munish Garg	1,00,000
20.	Henil Pankaj Sheth	80,000
21.	Akshay Kokra	70,000
22.	Sukhwant Singh	50,000
23.	Seema Singla	50,000
24.	Ruchi Singla	50,000
25.	Rajesh Kumar Jain	50,000
26.	Poonam Jain	50,000
27.	Siddhesh Jagannath Salunkhe	50,000

28.	Manish Dalal	50,000
29.	Devendra Kumar Goel	50,000
30.	Gogri Neelam Divyesh	50,000
31.	Aditya Vinay Madnani	50,000
32.	Harjeet Kaur	40,000
33.	ONS Steel Solutions LLP	25,000
34.	Narain Dass Singla	25,000
35.	Gopal Bansal	25,000
36.	Reema Gupta	25,000
37.	Pratima Yadav	25,000
38.	Gourav Singh	7,000
	Total (B)	**35,97,000**
	Grand Total (A+B)	**98,00,000**

RESOLVED FURTHER THAT The 'Relevant Date', as per the provisions of Chapter V of the SEBI ICDR Regulations for the purpose of determining the minimum issue / exercise price of Warrants / Equity Shares to be allotted on conversion of Warrants, shall be Wednesday, September 30, 2026 being the date which is 30 days prior to the date of passing of this resolution, i.e., the date of the EGM being October 30, 2026.

RESOLVED FURTHER THAT Warrants shall be convertible into equivalent number of fully paid-up equity shares of face value of Rs. 10/- (Rupees Ten Only) each ("Equity Shares") at the option of Proposed Allottee, in one or more tranches, within 18 (eighteen) months from the date of allotment of such Warrants, on such further terms and conditions as may be finalized by the Board.

RESOLVED FURTHER THAT the Equity Shares proposed to be so allotted upon conversion of Warrants shall rank pari-passu in all respects including as to dividend, with the existing fully paid-up Equity Shares of face value of Rs. 10/- (Rupees Ten Only) each of the Company, subject to the relevant provisions contained in the Memorandum of Association and Articles of Association of the Company.

RESOLVED FURTHER THAT issue of Warrants and Equity Shares to be allotted on exercise of Warrants shall be subject to the following terms and conditions:

a) Each Warrant held by Proposed Allottees shall entitle them to apply for and obtain allotment of one Equity Share at any time after the date of allotment but on or before the expiry of 18 months from the date of allotment of Warrants ("Warrant Exercise Period").

b) The Proposed Allottee(s) shall, on or before the date of allotment of Warrants, pay an amount equivalent to at least 25% of the Warrant Issue Price fixed per Warrant in terms of the SEBI ICDR Regulations which will be kept by the Company to be adjusted and appropriated against the Warrant Issue Price of the Equity Shares. The balance 75% of the Warrant Issue Price shall be payable by the Warrant Holder at the time of exercising the Warrants.

c) The pre-preferential shareholding, if any, of Proposed Allottees along with Warrants, being allotted and Equity Shares proposed to be allotted to Proposed Allottees pursuant to the conversion of Warrants, shall be under lock-in for such period as may be prescribed under Chapter V of ICDR Regulations.

d) Warrants being allotted to Proposed Allottees shall not be sold, transferred, hypothecated or encumbered in any manner during the lock-in period provided under Chapter V of ICDR Regulations except to the extent and in the manner permitted there under.

e) Warrants shall be issued and allotted by the Company only in dematerialized form within a period of 15 days from the date of passing a Special Resolution by the members, provided that where the issue and allotment of said warrants is pending on account of pendency of any approval for such issue and allotment by the Stock Exchange(s) and/or Regulatory Authorities, or Central Government, the issue and allotment shall be completed within the period of 15 days from the date of last such approval or within such further period/s as may be prescribed or allowed by the SEBI, the Stock Exchange(s) and/or Regulatory Authorities etc.

f) Warrants and Equity Shares to be issued and allotted by the Company upon exercise of Warrants shall, in each case, be in dematerialized form.

g) The consideration for allotment of Warrants and /or Equity Shares arising out of exercise of such Warrants shall be paid to the Company from the bank account of the Proposed Allottee(s).

h) Upon exercise of the option to convert the convertible Warrants within the tenure specified above, the Company shall ensure that the allotment of equity shares pursuant to exercise of the convertible Warrants is completed within 15 days from the date of such exercise by the allottee of such warrants.

i) In the event the Warrant Holder(s) do not exercise Warrants within the Warrant Exercise Period of 18 months from the date of allotment, the Warrants shall lapse and the amount paid shall stand forfeited by the Company.

j) The Company shall procure the listing and trading approvals for the Equity Shares to be issued and allotted to the Warrant holders upon exercise of the Warrants from the Stock Exchanges in accordance with the Listing Regulations and all other applicable laws, rules and regulations.

k) The Warrants by itself until converted into Equity Shares, do not give to the Warrant Holder any voting rights in the Company in respect of such Warrants. However, warrants holders shall be entitled to any corporate action such as issuance of bonus shares, right issue, split or consolidation of shares etc. announced by the Company between the date of warrants allotment and their conversion into Equity Shares.

RESOLVED FURTHER THAT subject to any applicable statutory approval(s) or permission(s), if required, the aforesaid approval accorded by the members of the Company, shall not become infructuous in its entirety for the mere reason that if any of the above Proposed Allottee(s) is/are held either ineligible or disqualified or otherwise failed to comply with any of the statutory requirement including the terms of this approval by members; and the Board/Committee(s) of the Board may, in the best interest of the Company, give effect to this resolution after eliminating the name(s) of such Proposed Allottee(s).

RESOLVED FURTHER THAT for the purpose of giving effect to this resolution, the Board of Directors of the Company and/or any Committee constituted by the Board for this purpose and/or Executive Director and/or KMP of the Company be and are hereby authorized severally on behalf of the Company to do all such acts, deeds, matters and things as it may in its absolute discretion consider necessary, desirable or expedient, including without limitation to make application to Stock Exchange(s) for obtaining of in-principle approval, listing of shares/warrants, filing of requisite documents with the Registrar of Companies, National Securities Depository Limited (NSDL), Central Depository Services (India) Limited (CDSL) or such other authorities as may be necessary for the purpose and/or including opening of one or more bank accounts in the name of the Company for this purpose, signing and execution of various deeds, documents and agreements and also to modify, accept and give effect to any modifications therein and the terms and conditions of the proposed issue, offer and allotment of the said Warrants, utilization of issue proceeds, signing of all

deeds and documents as may be required without being required to seek any further consent or approval of the shareholders.

RESOLVED FURTHER THAT in connection with any of the foregoing resolutions, the Board of Directors/Committee(s) of the Board and/or Executive Director and/or KMP of the Company be and are hereby severally authorized to execute and deliver any and all other documents, papers and to do or cause to be done any and all acts or things as may be necessary, appropriate or advisable in order to carry out the purposes and intent of the foregoing resolutions for the preferential issue; and any such documents so executed and delivered or acts and things done or caused to be done shall be conclusive evidence of the authority of the Company in so doing and any document so executed and delivered or acts and things done or caused to be done prior to the date hereof are hereby ratified, confirmed and approved as the acts and deeds of the Company, as the case may be.

RESOLVED FURTHER THAT for the purpose of giving effect to this Resolution, the Board of Directors/ Committee(s) of the Board be and is hereby authorized severally to settle any question, difficulty or doubt that may arise in this regard and also to delegate to the extent permitted by law, all or any of the powers herein conferred to any Executive Director or any other Key Managerial Personnel or any other officer(s) of the Company."

Regd. Office: S. No.110,115, Bayad Road, Taluka Dahegam, Sampa, Gandhinagar-382315, Gujarat, India
M: +91 7717302284
Website: www.suranisteel.com
Email: cs@suranisteel.com
CIN: L27109GJ2012PLC071373
Place: Gujarat
Date: October 07, 2026

By order of the Board of directors
For Surani Steel Tubes Limited

Sd/-
Vijay Singla
Managing Director
(DIN-00156801)

NOTES TO EGM NOTICE

1. In Compliance with the applicable provisions of the Companies Act, 2013 ("Act"), the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations") and pursuant to the Ministry of Corporate Affairs ('MCA') inter alia vide its General Circular No. 14/2020 dated April 08, 2020, No. 17/2020 dated April 13, 2020, 20/2020 dated May 05, 2020, No. 22/2020 dated June 15, 2020, No. 33/2020 dated September 28, 2020, No. 39/2020 dated December 31, 2020, No. 10/2021 dated June 23, 2021, No. 20/2021 dated December 8, 2021, No. 3/2022 dated May 05, 2022 and No. 11/2022 dated December 28, 2022, No. 09/2023 dated September 25, 2023 and General Circular No. 09/2024 dated September 19, 2024; 03/2025 dated September 22, 2025 (collectively referred to as "MCA Circulars"), and the Securities and Exchange Board of India vide its Circular(s) dated May 12, 2020, January 15, 2021, May 13, 2022, January 5, 2023, October 6, 2023, October 7, 2023 and October 3, 2024 ("SEBI Circulars"), and other applicable circulars and notifications issued (including any statutory modifications or re-enactment thereof for the time being in force and as amended from time to time, companies are allowed to hold EGM through Video Conferencing (VC) or other audio visual means (OAVM), without the physical presence of members at a common venue. In compliance with the said Circulars, EGM shall be conducted through VC / OAVM. In compliance with the said Circulars, the Extra-Ordinary General Meeting of the Company (EGM") is being held through VC/OAVM without the physical presence of the members at a common venue.

2. Pursuant to the Circular No. 14/2020 dated April 08, 2020, issued by the Ministry of Corporate Affairs, the facility to appoint proxy to attend and cast vote for the members is not available for this EGM. However, the Body Corporates are entitled to appoint authorised representatives to attend the EGM through VC/OAVM and participate there at and cast their votes through e-voting.

3. The Members can join the EGM in the VC/OAVM mode 15 minutes before and after the scheduled time of the commencement of the Meeting by following the procedure mentioned in the Notice. The facility of participation at the EGM through VC/OAVM will be made available for 1000 members on first come first served basis. This will not include large Shareholders (Shareholders holding 2% or more shareholding), Promoters, Institutional Investors, Directors, Key Managerial Personnel, the Chairpersons of the Audit Committee, Nomination and Remuneration Committee and Stakeholders Relationship Committee, Auditors etc. who are allowed to attend the EGM without restriction on account of first come first served basis.

4. The attendance of the Members attending the EGM through VC/OAVM will be counted for the purpose of reckoning the quorum under Section 103 of the Companies Act, 2013.

5. Pursuant to the provisions of Section 108 of the Companies Act, 2013 read with Rule 20 of the Companies (Management and Administration) Rules, 2014 (as amended) the Secretarial Standard on General Meetings (SS-2) issued by the ICSI and Regulation 44 of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015 (as amended), and the Circulars issued by the Ministry of Corporate Affairs from time to time the Company is providing facility of remote e-Voting to its Members in respect of the business to be transacted at the EGM. For this purpose, the Company has entered into an agreement with National Securities Depository Limited (NSDL) for facilitating voting through electronic means, as the authorized agency. The facility of casting votes by a member using remote e-Voting system as well as e-voting on the date of the EGM will be provided by NSDL.

6. In line with the Ministry of Corporate Affairs (MCA) Circular No. 17/2020 dated April 13, 2020, the Notice calling the EGM has been uploaded on the website of the Company at www.suranisteel.com. The Notice can also be accessed from the websites of the Stock

Exchange i.e. National Stock Exchange of India Limited at www.nseindia.com and the EGM Notice is also available on the website of NSDL (agency for providing the Remote e-Voting facility) i.e. www.evoting.nsdl.com.

7. EGM will be convened through VC/OAVM in compliance with applicable provisions of the Companies Act, 2013 read with MCA Circular issued from time to time.

8. Further, in accordance with the Secretarial Standard-2 on General Meetings issued by the Institute of Company Secretaries of India ("ICSI") read with Guidance/Clarification dated April 15, 2020 issued by ICSI, the proceedings of the EGM shall be deemed to be conducted at the Registered Office of the Company which shall be the deemed Venue of the EGM.

9. In accordance with the said circulars of MCA, SEBI and applicable provisions of the Act and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), this EGM of the Company shall be conducted through VC/ OAVM. The detailed procedure for participating in the Meeting through VC/OAVM is annexed herewith.

10. The Explanatory Statement pursuant to Section 102(1) of the Companies Act, 2013 (the "Act"), setting out the material facts for each item of special business mentioned in the Notice is annexed hereto. The relevant details, pursuant to Regulation 26 (4) and 36 (3) of the SEBI LODR and Secretarial Standard -2 on General Meetings issued by the Institute of Company Secretaries of India, in respect of Director seeking re-appointment at this EGM is annexed herewith.

11. Pursuant to the provisions of the Companies Act, 2013, a member entitled to attend and vote at the Extra-Ordinary General Meeting is entitled to appoint a proxy to attend and vote on his/her behalf and the proxy need not be a Member of the Company. **SINCE THIS EGM IS BEING HELD PURSUANT TO THE MCA CIRCULARS THROUGH VC/OAVM, PHYSICAL ATTENDANCE OF MEMBERS HAS BEEN DISPENSED WITH. ACCORDINGLY, THE FACILITY FOR APPOINTMENT OF PROXIES BY THE MEMBERS WILL NOT BE AVAILABLE FOR THE EXTRA-ORDINARY GENERAL MEETING AND HENCE THE PROXY FORM AND ATTENDANCE SLIP ARE NOT ANNEXED TO THE NOTICE.**

12. Since the EGM will be held through VC/OAVM, the Route Map is not annexed in this Notice.

13. The Company's Registrar and Transfer Agents for its Share Registry work (physical and electronic) are M/S Beetal Financial & Computer Services (P) Limited

    Address: Beetal House, 3rd Floor, 99 Madangir, Near Dada Harsukh Das Mandir, Behind Local Shopping Center, New Delhi, 110062, **Email:** beetalrta@gmail.com

14. Institutional / Corporate Shareholders (i.e. other than individuals / HUF, NRI, etc.) are required to send a scanned copy (PDF/ JPG Format) of its Board or governing body Resolution/Authorization etc., authorizing its representative to attend the EGM through VC / OAVM on its behalf and to vote through remote e-voting. The said Resolution/Authorization shall be sent to the Scrutinizer by email through its registered email address at saahilmalhotra42@gmail.com and to the Company at cs@suranisteel.com

15. The attendance of the Members attending the EGM through VC/OAVM will be counted for the purpose of reckoning the quorum under Section 103 of the Companies Act, 2013. Members can attend and participate in the Extra-Ordinary General Meeting through VC/ OAVM only.

16. In compliance with the aforesaid MCA Circulars and SEBI Circulars, the Notice of the EGM has been uploaded on the website of the Company at www.suranisteel.com. The Notice is also available on the website of the Stock Exchange i.e. National Stock Exchange of India Limited at www.nseindia.com. The EGM Notice is also available on the website of the Company. For members who have not registered their email ids so far, are requested to register their email ids for receiving all from the Company electronically.

17. Members desirous of getting any information about the accounts and/or operations of the Company are requested to write to the Company at cs@suranisteel.com at least seven days before the date of the Meeting to enable the Company to keep the information ready at the Meeting.

18. SEBI vide its Circular dated January 25, 2022 has mandated the Listed Companies to issue securities in demat form only while processing service requests viz. Issue of duplicate securities certificate; claim from Unclaimed Suspense Account; Renewal/Exchange of securities certificate; Endorsement; Sub-division/ Splitting of securities certificate; Consolidation of securities certificates/folios; Transmission and Transposition. Accordingly, shareholders are requested to make service requests by submitting a duly filled and signed Form ISR–4, the format of which is available on the Company's website i.e. www.suranisteel.com. Any service request can be processed only after the folio is KYC compliant. SEBI vide its notification dated January 24, 2022 and March 16, 2023, has mandated that all requests for transfer of securities including transmission and transposition requests shall be processed only in dematerialized form. In view of the same and to eliminate all risks associated with physical shares and to avail various benefits of dematerialisation, members are advised to dematerialise the shares held by them in physical form.

19. Members are requested to intimate changes, if any, pertaining to their name, postal address, e-mail address, telephone/mobile numbers, Permanent Account Number (PAN), mandates, nominations, power of attorney, bank details such as, name of the bank and branch details, bank account number, MICR code, IFSC code, etc.:

    a. For shares held in electronic form: to their Depository Participants (DPs)
    b. For shares held in physical form: to the Company/ Registrar and Transfer Agent in prescribed Form ISR-1 and other forms pursuant to SEBI Circular No. SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2021/655 dated November 3, 2021.

20. All the documents referred to in the Notice and Explanatory Statement along with other relevant and required documents will be made available for inspection by the Members on the website of the Company during the meeting.

21. The shareholders holding shares in physical form, if any are requested to register their e-mail address with the Registrar & Share Transfer Agents by sending duly signed request letter quoting their folio no., name and address. In case of shares held in demat form, the shareholders may register their e-mail addresses with their DPs (Depository Participants). SEBI, vide its circular dated 3 November 2021 (subsequently amended by circulars dated 14 December 2021, 16 March 2023 and 17 November 2023) mandated that the security holders (holding securities in physical form), whose folio(s) do not have PAN, Contact Details or Mobile Number or Bank Account Details or Specimen Signature updated, shall be eligible for any dividend payment in respect of such folios, only through electronic mode with effect from 1 April 2024, only upon furnishing the PAN, choice of nomination, contact details including mobile number, bank account

details and specimen signature. For updation of above detail please complete form ISR- 1, ISR-2, SH-13 or ISR-3 which can be download from RTA website.

22. Pursuant to Section 72 of the Act, Members are entitled to make a nomination in respect of the shares held by them. Members desirous of making a nomination, pursuant to the Rule 19(1) of the Companies (Share Capital and Debentures) Rules, 2014 are requested to send their requests in Form No. SH-13 to the RTA. Further, Members desirous of cancelling/varying their earlier nomination (pursuant to the Rule 19(9) of the Companies (Share Capital and Debentures) Rules,2014), are requested to send their requests in Form No. SH-14 to the RTA. These forms will be made available on request.

23. The Company has designated an exclusive email id i.e. cs@suranisteel.com to redress Members' complaints/ grievances.

24. The Securities and Exchange Board of India (SEBI) vide circular No. SEBI/HO/MIRSD/DOP1/CIR/P/ 2018/73 dated April 20, 2018 has mandated compulsory submission of Permanent Account Number (PAN) and bank details by every participant in the securities market. Members holding shares in the electronic form are, therefore requested to submit their PAN and bank details to their Depository Participant(s) and members holding shares in physical form shall submit the details to Company/RTA.

25. Pursuant to the provisions of Section 108 of the Companies Act, 2013 read with Rule 20 of the Companies (Management and Administration) Rules, 2014 (as amended) and Regulation 44 of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015 (as amended), and the Circulars issued by the Ministry of Corporate Affairs dated April 08, 2020, April 13, 2020 and May 05, 2020 the Company is providing facility of remote e-Voting to its Members in respect of the business to be transacted at the EGM. For this purpose, the Company has availed the services of NSDL for facilitating voting through electronic means, as the authorized agency. The facility of casting votes by a member using remote e-Voting system as well as venue voting on the date of the EGM will be provided by NSDL.

26. The remote e-Voting period commences on Tuesday, October 27, 2026 (09:00 a.m. IST) and ends on Thursday, October 29, 2026 (05:00 p.m. IST). During this period, Members of the Company, holding shares both in physical form or in dematerialized form, as on the cut-off date (record date) i.e. Friday, October 23, 2026 may cast their vote by remote e-voting. The remote e-voting module shall be disabled by CDSL for voting thereafter. Once the vote on a resolution is cast by the member, the member shall not be allowed to change it subsequently. The voting rights of the Members (for voting through remote e-Voting before/ during the EGM) shall be in proportion to their share of the paid-up equity share capital of the Company.

27. A person, whose name is recorded in the Register of Members or in the Register of Beneficial Owners maintained by the Depositories as on the Cut-off Date only shall be entitled to exercise his/her/its voting rights on the resolution proposed in the Notice and attend the Meeting. A person, who is not an equity shareholder as on the Cut-off Date, should treat the Notice for information purpose only.

28. The documents referred to in the accompanying Explanatory Statement shall be open for inspection by the Equity Shareholders at the registered office of the Company between 11.00 AM (IST) and 5.00 PM (IST) on all working days up to the date of the meeting. The same are also available on the website of the Company.

29. Mr. Sahil Malhotra of SV Associates, Practicing Company Secretaries has been appointed as the Scrutinizer to scrutinize the remote e-voting process as well as the e-voting process at the EGM in a fair and transparent manner.

30. The Scrutinizer shall make, not later than two working days of the conclusion of the EGM, a consolidated scrutinizer's report of the total votes cast in favour or against, if any, to the Chairman or a Director authorized by him in writing, who shall countersign the same. The Chairman or the authorised Director shall declare the result of the voting forthwith.

31. The results declared along with the Scrutinizer's Report shall be displayed at the Registered Office of the Company and uploaded on the Company's website www.suranisteel.com after the same is declared by the Chairman/authorised person. The Results shall also be simultaneously forwarded to the NSE.

32. In case of joint holders, the Members whose name appear first holder in the order of names as per the Register of Members of the Company will be entitled to vote at the EGM.

THE INSTRUCTIONS FOR MEMBERS FOR REMOTE E-VOTING AND JOINING GENERAL MEETING ARE AS UNDER:

The remote e-voting period begins on Tuesday, October 27, 2026 at 9:00 A.M. and ends on Thursday, October 29, 2026 at 5:00 P.M. The remote e-voting module shall be disabled by NSDL for voting thereafter. The Members, whose names appear in the Register of Members / Beneficial Owners as on the record date (cut-off date) i.e. Friday, October 23, 2026 may cast their vote electronically. The voting right of shareholders shall be in proportion to their share in the paid-up equity share capital of the Company as on the cut-off date, being October 23, 2026.

How do I vote electronically using NSDL e-Voting system?

The way to vote electronically on NSDL e-Voting system consists of "Two Steps" which are mentioned below:

Step 1: Access to NSDL e-Voting system

A) Login method for e-Voting and joining virtual meeting for Individual shareholders holding securities in demat mode

In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.
Login method for Individual shareholders holding securities in demat mode is given below:

Type of shareholders	Login Method
Individual Shareholders holding securities in demat mode with NSDL.	1. For OTP based login you can click on https://eservices.nsdl.com/SecureWeb/evoting/evotinglogin.jsp. You will have to enter your 8-digit DP ID,8-digit Client Id, PAN No., Verification code and generate OTP. Enter the OTP received on registered email id/mobile number and click on login. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or **e-Voting service provider i.e. NSDL** and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.

	2. Existing **IDeAS** user can visit the e-Services website of NSDL Viz. https://eservices.nsdl.com either on a Personal Computer or on a mobile. On the e-Services home page click on the "**Beneficial Owner"** icon under **"Login"** which is available under **'IDeAS'** section, this will prompt you to enter your existing User ID and Password. After successful authentication, you will be able to see e-Voting services under Value added services. Click on **"Access to e-Voting"** under e-Voting services and you will be able to see e-Voting page. Click on company name or **e-Voting service provider i.e. NSDL** and you will be re-directed to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. 3. If you are not registered for IDeAS e-Services, option to register is available at https://eservices.nsdl.com. Select **"Register Online for IDeAS Portal"** or click at https://eservices.nsdl.com/SecureWeb/IdeasDirectReg.jsp 4. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsdl.com/ either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/Member' section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or **e-Voting service provider i.e. NSDL** and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. 5. Shareholders/Members can also download NSDL Mobile App "**NSDL Speede**" facility by scanning the QR code mentioned below for seamless voting experience. **NSDL Mobile App is available on** App Store Google Play
Individual Shareholders holding securities in demat mode with CDSL	1. Users who have opted for CDSL Easi / Easiest facility, can login through their existing user id and password. Option will be made available to reach e-Voting page without any further authentication. The users to login Easi /Easiest are requested to visit CDSL website www.cdslindia.com and click on login icon & New System

	Myeasi Tab and then user your existing my easi username & password. 2. After successful login the Easi / Easiest user will be able to see the e-Voting option for eligible companies where the e-voting is in progress as per the information provided by company. On clicking the e-voting option, the user will be able to see e-Voting page of the e-Voting service provider for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. Additionally, there is also links provided to access the system of all e-Voting Service Providers, so that the user can visit the e-Voting service providers' website directly. 3. If the user is not registered for Easi/Easiest, option to register is available at CDSL website www.cdslindia.com and click on login & New System Myeasi Tab and then click on registration option. 4. Alternatively, the user can directly access e-Voting page by providing Demat Account Number and PAN No. from a e-Voting link available on www.cdslindia.com home page. The system will authenticate the user by sending OTP on registered Mobile & Email as recorded in the Demat Account. After successful authentication, user will be able to see the e-Voting option where the e-voting is in progress and also able to directly access the system of all e-Voting Service Providers.
Individual Shareholders (holding securities in demat mode) login through their depository participants	You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. upon logging in, you will be able to see e-Voting option. Click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.

Important note: Members who are unable to retrieve User ID/ Password are advised to use Forget User ID and Forget Password option available at abovementioned website.

Helpdesk for Individual Shareholders holding securities in demat mode for any technical issues related to login through Depository i.e. NSDL and CDSL.

Login type	Helpdesk details
Individual Shareholders holding securities in demat mode with NSDL	Members facing any technical issue in login can contact NSDL helpdesk by sending a request at evoting@nsdl.com or call at 022 - 4886 7000
Individual Shareholders holding securities in demat mode with CDSL	Members facing any technical issue in login can contact CDSL helpdesk by sending a request at helpdesk.evoting@cdslindia.com or contact at toll free no. 1800-21-09911

B) Login Method for e-Voting and joining virtual meeting for shareholders other than Individual shareholders holding securities in demat mode and shareholders holding securities in physical mode.

How to Log-in to NSDL e-Voting website?

1. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsdl.com/ either on a Personal Computer or on a mobile.
2. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/Member' section.
3. A new screen will open. You will have to enter your User ID, your Password/OTP and a Verification Code as shown on the screen.
   Alternatively, if you are registered for NSDL eservices i.e. IDEAS, you can log-in at https://eservices.nsdl.com/ with your existing IDEAS login. Once you log-in to NSDL eservices after using your log-in credentials, click on e-Voting and you can proceed to Step 2 i.e. Cast your vote electronically.

4. Your User ID details are given below:

Manner of holding shares i.e. Demat (NSDL or CDSL) or Physical	**Your User ID is:**
a) For Members who hold shares in demat account with NSDL.	8 Character DP ID followed by 8 Digit Client ID **For example:** if your DP ID is IN300*** and Client ID is 12****** then your user ID is IN300***12******.
b) For Members who hold shares in demat account with CDSL.	16 Digit Beneficiary ID **For example:** if your Beneficiary ID is 12********** then your user ID is 12**********
c) For Members holding shares in Physical Form.	EVEN Number followed by Folio Number registered with the company **For example:** if folio number is 001*** and EVEN is 101456 then user ID is 101456001***

5. Password details for shareholders other than Individual shareholders are given below:
   a) If you are already registered for e-Voting, then you can user your existing password to login and cast your vote.

   b) If you are using NSDL e-Voting system for the first time, you will need to retrieve the 'initial password' which was communicated to you. Once you retrieve your 'initial password', you need to enter the 'initial password' and the system will force you to change your password.
   c) How to retrieve your 'initial password'?
      (i) If your email ID is registered in your demat account or with the company, your 'initial password' is communicated to you on your email ID. Trace the email sent to you from NSDL from your mailbox. Open the email and open the attachment i.e. a .pdf file. Open the .pdf file. The password to open the .pdf file is your 8 digit client ID for NSDL account, last 8 digits of client ID for CDSL account or folio

number for shares held in physical form. The .pdf file contains your 'User ID' and your 'initial password'.

(ii) If your email ID is not registered, please follow steps mentioned below in **process for those shareholders whose email ids are not registered.**

6. If you are unable to retrieve or have not received the "Initial password" or have forgotten your password:
   a) Click on "**Forgot User Details/Password**?"(If you are holding shares in your demat account with NSDL or CDSL) option available on www.evoting.nsdl.com.
   b) **Physical User Reset Password**?" (If you are holding shares in physical mode) option available on www.evoting.nsdl.com.
   c) If you are still unable to get the password by aforesaid two options, you can send a request at evoting@nsdl.com mentioning your demat account number/folio number, your PAN, your name and your registered address etc.
   d) Members can also use the OTP (One Time Password) based login for casting the votes on the e-Voting system of NSDL.

7. After entering your password, tick on Agree to "Terms and Conditions" by selecting on the check box.
8. Now, you will have to click on "Login" button.
9. After you click on the "Login" button, Home page of e-Voting will open.

Step 2: Cast your vote electronically and join General Meeting on NSDL e-Voting system.

How to cast your vote electronically and join General Meeting on NSDL e-Voting system?

1. After successful login at Step 1, you will be able to see all the companies "EVEN" in which you are holding shares and whose voting cycle and General Meeting is in active status.

2. Select "EVEN" of company for which you wish to cast your vote during the remote e-Voting period and casting your vote during the General Meeting. For joining virtual meeting, you need to click on "VC/OAVM" link placed under "Join Meeting".

3. Now you are ready for e-Voting as the Voting page opens.

4. Cast your vote by selecting appropriate options i.e. assent or dissent, verify/modify the number of shares for which you wish to cast your vote and click on "Submit" and also "Confirm" when prompted.

5. Upon confirmation, the message "Vote cast successfully" will be displayed.

6. You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page.

7. Once you confirm your vote on the resolution, you will not be allowed to modify your vote.

General Guidelines for shareholders

1. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) are required to send scanned copy (PDF/JPG Format) of the relevant Board Resolution/ Authority letter etc. with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote, to the Scrutinizer by e-mail to saahilmalhotra42@gmail.com with a copy marked to evoting@nsdl.com. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) can also upload their Board Resolution / Power of Attorney / Authority Letter etc. by clicking on "Upload Board Resolution / Authority Letter" displayed under "e-Voting" tab in their login.

2. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the "Forgot User Details/Password?" or "Physical User Reset Password?" option available on www.evoting.nsdl.com to reset the password.

3. In case of any queries, you may refer the Frequently Asked Questions (FAQs) for Shareholders and e-voting user manual for Shareholders available at the download section of www.evoting.nsdl.com or call on.: 022 - 4886 7000 or send a request to Mr. Sachin Kareliya at evoting@nsdl.com

Process for those shareholders whose email ids are not registered with the depositories for procuring user id and password and registration of e mail ids for e-voting for the resolutions set out in this notice:

1. In case shares are held in physical mode please provide Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self-attested scanned copy of PAN card), AADHAR (self-attested scanned copy of Aadhar Card) by email to cs@suranisteel.com

2. In case shares are held in demat mode, please provide DPID-CLID (16-digit DPID + CLID or 16-digit beneficiary ID), Name, client master or copy of Consolidated Account statement, PAN (self-attested scanned copy of PAN card), AADHAR (self-attested scanned copy of Aadhar Card) to cs@suranisteel.com. If you are an Individual shareholder holding securities in demat mode, you are requested to refer to the login method explained at **step 1 (A**) i.e. **Login method for e-Voting and joining virtual meeting for Individual shareholders holding securities in demat mode**.

3. Alternatively, shareholder/members may send a request to evoting@nsdl.com for procuring user id and password for e-voting by providing above mentioned documents.

4. In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are required to update their mobile number and email ID correctly in their demat account in order to access e-Voting facility.

THE INSTRUCTIONS FOR MEMBERS FOR e-VOTING ON THE DAY OF THE EGM ARE AS UNDER:

1. The procedure for e-Voting on the day of the EGM is same as the instructions mentioned above for remote e-voting.

2. Only those Members/ shareholders, who will be present in the EGM through VC/OAVM facility and have not casted their vote on the Resolutions through remote e-Voting and are otherwise not barred from doing so, shall be eligible to vote through e-Voting system in the EGM.

3. Members who have voted through Remote e-Voting will be eligible to attend the EGM. However, they will not be eligible to vote at the EGM.

4. The details of the person who may be contacted for any grievances connected with the facility for e-Voting on the day of the EGM shall be the same person mentioned for Remote e-voting.

INSTRUCTIONS FOR MEMBERS FOR ATTENDING THE EGM THROUGH VC/OAVM ARE AS UNDER:

1. Member will be provided with a facility to attend the EGM through VC/OAVM through the NSDL e-Voting system. Members may access by following the steps mentioned above for **Access to NSDL e-Voting system**. After successful login, you can see link of "VC/OAVM" placed under **"Join meeting"** menu against company name. You are requested to click on VC/OAVM link placed under Join Meeting menu. The link for VC/OAVM will be available in Shareholder/Member login where the EVEN of Company will be displayed. Please note that the members who do not have the User ID and Password for e-Voting or have forgotten the User ID and Password may retrieve the same by following the remote e-Voting instructions mentioned in the notice to avoid last minute rush.

2. Members are encouraged to join the Meeting through Laptops for better experience.

3. Further Members will be required to allow Camera and use Internet with a good speed to avoid any disturbance during the meeting.

4. Please note that Participants Connecting from Mobile Devices or Tablets or through Laptop connecting via Mobile Hotspot may experience Audio/Video loss due to Fluctuation in their respective network. It is therefore recommended to use Stable Wi-Fi or LAN Connection to mitigate any kind of aforesaid glitches.

5. Shareholders who would like to express their views/have questions may send their questions in advance mentioning their name demat account number/folio number, email id, mobile number at cs@suranisteel.com. The same will be replied by the company suitably.

6. Shareholders who would like to express their views/ ask questions during the meeting may register themselves as a speaker by sending their request in advance atleast **7 days prior to meeting** mentioning their name, demat account number/folio number, email id, mobile number at cs@suranisteel.com. The shareholders who do not wish to speak during the EGM but have queries may send their queries in advance **7 days prior to meeting** mentioning their name, demat account number/folio number, email id, mobile number at cs@suranisteel.com. These queries will be replied to by the Company suitably by email.

7. Those shareholders who have registered themselves as a speaker will only be allowed to express their views/ask questions during the meeting.

8. Only those shareholders, who are present in the EGM through VC/OAVM facility and have not casted their vote on the Resolutions through remote e-Voting and are otherwise not barred from doing so, shall be eligible to vote through e-Voting system available during the EGM.

9. If any Votes are cast by the shareholders through the e-voting available during the EGM and if the same shareholders have not participated in the meeting through VC/OAVM facility, then the votes cast by such shareholders may be considered invalid as the facility of e-voting during the meeting is available only to the shareholders attending the meeting.

EXPLANATORY STATEMENT PURSUANT TO SECTION 102 OF THE COMPANIES ACT, 2013, FORMING PART OF THE NOTICE OF EXTRA-ORDINARY GENERAL MEETING

ITEM NO. 1

The Members may take note that presently the paid-up share capital of the Company is Rs. 25,00,00,000/- consisting of 2,50,00,000 Equity Shares of Rs. 10/- (Rupees Ten Only) each.

In view of business requirements of raising funds from time to time, the Company proposes to increase its Authorised Share Capital to Rs. 26,00,00,000/- (Rupees Twenty-Six Crore Only) consisting of 2,60,00,000 (Two Crore Sixty Lakh Only) Equity Shares of Rs. 10/- (Rupees Ten Only) each.

Pursuant to the provisions of Section 61, the proposed increase of Authorised Share Capital of the Company requires approval of the Members. Consequent upon the increase in Authorised Share Capital of the Company, Clause V of the Memorandum of Association of the Company will require alteration so as to reflect the increase in the Authorised Share Capital. Accordingly, approval of the Members of the Company is hereby sought by way of Ordinary Resolution as set out in Item No. 1 of the Notice of EGM.

A copy of the Memorandum of Association of the Company along with the proposed amendments is available for inspection by the members at the Registered Office of the Company between 11:00 AM and 5:00 PM on all working days from Monday to Friday from the date of dispatch of this Notice till the date of EGM, except all national holidays.

None of the Directors and Key Managerial Personnel (including relatives of directors or key managerial personnel) of the Company is concerned or interested, financially or otherwise, in this resolution except to the extent of their shareholding in the Company.

ITEM NO. 2

The Members are aware that, with a view to more appropriately signify and reflect the present business activities, profile and strategic direction of the Company, the Board of Directors of the Company, at its meeting held on Wednesday, September 30, 2026, considered and approved the proposal for change of name of the Company from “Surani Steels Tubes Limited” to “Singlon Limited”, subject to the approval of the Members and receipt of the requisite statutory and regulatory approvals.

The proposed name “Singlon Limited” is intended to provide a more appropriate corporate identity to the Company and to signify and reflect its evolving business activities, present business profile and future growth objectives. The proposed change of name is also intended to establish a distinct and appropriate identity for the Company, commensurate with the nature and direction of its business and its long-term strategic vision.

Pursuant to the provisions of the Companies Act, 2013 and the rules made thereunder, approval of the Members by way of a Special Resolution is required for effecting the proposed change in the name of the Company and the consequential amendments to the Memorandum of Association and Articles of Association of the Company.

It may please be noted that the Registrar of Companies / Central Registration Centre (CRC) has confirmed the availability of the proposed name “Singlon Limited”.

Further, a certificate issued by the Practicing Chartered Accountant confirming compliance with the conditions prescribed under Regulation 45(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 is enclosed as Annexure – A.

The proposed change of name shall not affect the legal status, constitution, business operations, rights or obligations of the Company or any of its stakeholders. The change of name shall be subject to receipt of all necessary statutory and regulatory approvals, including approval of the Ministry of Corporate Affairs.

None of the Directors, Key Managerial Personnel of the Company and/or their relatives are, in any way, concerned or interested, financially or otherwise, in the proposed resolution, except to the extent of their respective shareholding, if any, in the Company.

ITEM NO. 3

The Board of Directors of the Company, from time to time, has assessed the fund requirements of the Company, having regard to its growth plans, business objectives and evolving financial requirements, and accordingly, the Board of Directors of the Company, at its meeting held on Wednesday, October 07, 2026 approved the issuance of up to 98,00,000 (Ninety-Eight Lakh) Fully Convertible Warrants ("Warrants") each convertible into one fully paid-up equity share of the Company having a face value of Rs. 10/- (Rupees Ten Only), in one or more tranches, to the allottees, comprising a "Promoter Group" entity and "Non-Promoter, Public Category', on a preferential basis, at an issue price of Rs. 102/- (Rupees One Hundred and Two Only) per warrant, which is higher than the floor price determined in accordance with the provision of Chapter V of SEBI ICDR Regulations, payable in cash for aggregating amount of up to not exceeding Rs. 99,96,00,000/- (Rupees Ninety-Nine Crore Ninety-Six Lakh Only), in accordance with the provisions of Section 42 and Section 62(1)(c) of the Companies Act, 2013, as amended ('Act') read with Companies (Prospectus and Allotment of Securities) Rules, 2014, and Companies (Share Capital and Debentures) Rules, 2014 as amended ("Rules"), Chapter V of SEBI ICDR Regulations, subject to approval of shareholders and other regulatory authorities, as may be applicable.

The proposed issuance of convertible warrants is intended to meet the Company's present and future funding requirements and to support its growth strategy. The structure enables an upfront commitment of funds with flexibility of conversion into equity within the prescribed timeline, thereby facilitating phased capital infusion and progressive strengthening of the Company's capital base.

While the proposed issuance would result in an increase in the paid-up equity share capital upon conversion of the Warrants, the Board believes that the same is in the best interest of the Company and its stakeholders, considering the intended use of proceeds, strengthening of the balance sheet and long-term growth objectives.

The Special Resolution set out in Item No. 3 of the Notice is proposed pursuant to the provisions of Sections 42 and 62 of the Companies Act, 2013, for the issue and allotment of up to 98,00,000 (Ninety-Eight Lakh) fully convertible warrants, each convertible into one fully paid-up equity share of face value of Rs. 10/- (Rupees Ten Only), at an issue price of Rs. 102/- (Rupees One Hundred and Two Only) per warrant, which is higher than the floor price determined in accordance with Chapter V of the SEBI ICDR Regulations, payable in cash, aggregating up to Rs. 99,96,00,000 (Rupees Ninety-Nine Crore Ninety-Six Lakh Only) on a preferential basis.

The preferential issue to the proposed allottee is subject to receipt of necessary approvals, including those of the Members and the Stock Exchanges.

The details of the issue and other particulars as required in terms of Sections 23(1)(b), 42 and 62(1)(c) of the Companies Act, 2013, read with Rule 14(1) of the Companies (Prospectus and Allotment of Securities) Rules, 2014, Rule 13 of the Companies (Share Capital and Debentures) Rules, 2014 and Regulation 160 and Regulation 163 of the SEBI ICDR Regulations are set forth below:

1. **Objects of the Preferential Issue**

The Company intends to utilize the gross proceeds from this preferential issue towards the following objects:

(a) Working Capital Requirement;
(b) General Corporate Purpose
(c) Issue Related Expenses which includes “In-Principle application” fee to Stock Exchange, payment to be paid to ROC, Advisors/consultants to the issue, Registered Valuer, Registrar and Share Transfer Agents of the Company, e-voting agency, Depositories etc.
(collectively, hereinafter referred to as the "Objects")

Utilization of gross proceeds

The intended use of the gross proceeds of the preferential issue is as under: -

Sr. No.	Particulars	Total estimated amount to be utilized (₹ in Crores)*	Tentative timeline for utilization of funds
1	Working Capital Requirement	74.85	By September 30, 2028
2	General Corporate Purpose	24.85	By September 30, 2028
3	Issue Related Expenses which includes “In-Principle application” fee to Stock Exchange, payment to be paid to ROC, Advisors/consultants to the issue, Registered Valuer, Registrar and Share Transfer Agents of the Company, e-voting agency, Depositories etc.	0.26	By September 30, 2028
	Total	**99.96**	

***considering 100% conversion of Warrants into Equity Shares within the stipulated time.*

Note: Since present preferential issue is for convertible warrants, issue proceeds in respect of warrants shall be received by the Company in 18 months period from the date of allotment of warrants in terms of Chapter V of the SEBI (ICDR) Regulation, and as estimated by our management, the entire proceeds received from the issue would be utilized for the all the above-mentioned objects, in phases, as per the company’s business requirements and availability of issue proceeds. However, the same is dependent on a variety of factors such as financial, market and sectoral conditions, business performance and strategy, competition and other external factors, which may not be within the control of the Company and may result in modifications to the proposed schedule for utilization of the Issue Proceeds at the discretion of the Board/Committee, subject to compliance with applicable laws.

If the Issue Proceeds are not utilized (in full or in part) for the Objects during the period stated above due to any such factors, the remaining Issue Proceeds shall be utilized in subsequent periods in such manner as may be determined by the Board/Committee, in accordance with applicable laws. This may entail rescheduling and revising the planned expenditure and funding requirements and increasing or decreasing the expenditure for a particular purpose from the planned expenditure as may be determined by the Board/Committee, subject to compliance with applicable laws.

The requirement stipulated under NSE Circular No. NSE/CML/2022/56 dated December 13, 2022 with respect to additional disclosures relating to the objects of the issue is not applicable to the Company, as the issue size of the proposed preferential issue is less than Rs. 100 Crores. However, with a view to ensuring greater transparency and providing adequate information to the Members, the Company has voluntarily provided the relevant disclosures relating to the objects of the issue and the proposed utilisation of the proceeds hereinabove.

Interim Use of Proceeds

Any pending utilization of the gross proceeds will be deposited exclusively with scheduled commercial banks listed in the second schedule of the Reserve Bank of India Act, 1934, in accordance with all applicable laws and regulations.

Monitoring of Utilization of Funds

As the issue size is less than ₹100 Crore (Rupees One Hundred Crore only), the Company is not required to appoint a credit rating agency as a monitoring agency in terms of regulation 162A of the SEBI ICDR Regulations.

2. **Particulars of the offer including date of passing of Board resolution, kind of Securities offered, maximum number of Securities to be issued, manner of issue of shares, class or classes of persons to whom allotment is proposed to be made and the Issue Price**

The Board of Directors of the Company, at its meeting held on Wednesday, October 07, 2026 approved the issuance of up to 98,00,000 (Ninety-Eight Lakh) Fully Convertible Warrants ("Warrants") each convertible into one fully paid-up equity share of the Company having a face value of Rs. 10/- (Rupees Ten Only), in one or more tranches, to the allottees, comprising a "Promoter Group" entity and "Non-Promoter, Public Category', on a preferential basis, at an issue price of Rs. 102/- (Rupees One Hundred and Two Only) per warrant, which is higher than the floor price determined in accordance with the provision of Chapter V of SEBI ICDR Regulations, payable in cash for aggregating amount of up to not exceeding Rs. 99,96,00,000/- (Rupees Ninety-Nine Crore Ninety-Six Lakh Only), in accordance with the provisions of Section 42 and Section 62(1)(c) of the Companies Act, 2013, as amended ('Act') read with Companies (Prospectus and Allotment of Securities) Rules, 2014, and Companies (Share Capital and Debentures) Rules, 2014 as amended ("Rules"), Chapter V of SEBI ICDR Regulations, subject to approval of shareholders and other regulatory authorities, as may be applicable.

3. **Relevant date:**

The 'Relevant Date', as per the provisions of Chapter V of the SEBI ICDR Regulations for the purpose of determining the minimum issue / exercise price of Warrants / Equity Shares to be allotted on conversion of Warrants, shall be **Wednesday, September 30, 2026** being the date which is 30 days prior to the date of passing of this resolution, i.e., the date of the EGM being October 30, 2026

4. **Basis on which the price has been arrived at, justification for the price (including premium, if any);**

The Equity Shares of the Company are listed on National Stock Exchange of India Limited ("**NSE**"). The Equity Shares are frequently traded in terms of ICDR Regulations and floor price has been determined in accordance with ICDR Regulations.

In case of the frequently traded shares, as per Regulation 164(1) of the SEBI (ICDR) Regulations, 2018, a minimum issue price of the Convertible Warrants in preferential issue has to be calculated as under:

a. the 90 trading days volume weighted average price of the related equity shares quoted on the recognized stock exchange preceding the relevant date; which computes to Rs. 101.07/-

or

b. the 10 trading days volume weighted average price of the related equity shares quoted on a

recognized stock exchange preceding the relevant date; which computes to Rs. 96.22/-.

Whichever is higher

In terms of the provisions of Regulation 164(1) of the SEBI ICDR Regulations, the minimum price at which the warrants may be issued computes to Rs. 101.07/- each.

Further, the method of determination of price as per the Articles of Association of the Company is not applicable as the Articles of Association of the Company are silent on the determination of a floor price/ minimum price of the shares / Warrants issued on a preferential basis.

Additionally, the Company has obtained a valuation report from an independent registered valuer in terms of Regulation 166A of SEBI (ICDR) Regulations, 2018, as the proposed allotment exceeds 5% of the post-issue fully diluted share capital of the Company to a single allottee or to an allottee along with persons acting in concert. The valuation has been carried out by Mr. Manish Manwani (Registered Valuer – IBBI/RV/03/2021/14113), who has determined the value at Rs. 101.07/- per warrant. The said report is available on the website of the Company at https://www.suranisteel.com/images/Valuation_Report_2026.pdf

After considering the above pricing parameters and the valuation report, it was decided to issue these warrants to be allotted on preferential basis to the proposed allottees at issue price of Rs. 102/- each.

5. **Amount which the company intends to raise by way of such securities;** Aggregate amount of up to Rs. 99,96,00,000 (Rupees Ninety-Nine Crore Ninety-Six Lakh Only)

6. **Name and address of valuer who performed valuation;** Mr. Manish Manwani, independent registered valuer (IBBI Registration No.: IBBI/RV/03/2021/14113), having office at Unit No. 125, Tower B-3, Spaze Itech Park, Sohna Road, Sector-49, Gurugram, Haryana-122018

7. **Principal terms of Assets charged as securities:** Not Applicable

8. **Material terms of raising such securities:** The same has been disclosed in the respective resolution.

9. **The justification for the allotment proposed to be made for consideration other than cash together with valuation report of the registered valuer:** Not Applicable

10. **Valuation for consideration other than cash**: Not Applicable

11. **The class or classes of persons to whom the allotment is proposed to be made:**

    The Preferential Issue of Warrants is proposed to be made to persons belonging to “Promoter/Promoter Group and “Non-Promoter, Public Category"

12. **Current and proposed status of the allottee(s) post the preferential issues namely, promoter or non-promoter**

S. No.	Name(s) of the Proposed Allottees	Current Status	Post Status
1	M/s Himani Steels Private Limited	Promoter/Promoter Group	Promoter/Promoter Group
2	Ajay Pandey	Non-Promoter, Public Category	Non-Promoter, Public Category
3	Rajesh Agarwal	Non-Promoter, Public Category	Non-Promoter, Public Category

4	Shiv Sehgal	Non-Promoter, Public Category	Non-Promoter, Public Category
5	Vikram Bansal	Non-Promoter, Public Category	Non-Promoter, Public Category
6	Dharmendra Narpatlal Zaveri	Non-Promoter, Public Category	Non-Promoter, Public Category
7	Uma Rani	Non-Promoter, Public Category	Non-Promoter, Public Category
8	Rohit D Gupta	Non-Promoter, Public Category	Non-Promoter, Public Category
9	Amit Kumar	Non-Promoter, Public Category	Non-Promoter, Public Category
10	Raghav Agarwal	Non-Promoter, Public Category	Non-Promoter, Public Category
11	Vinay Arunkumar Sanklecha	Non-Promoter, Public Category	Non-Promoter, Public Category
12	Rishi Pahwa	Non-Promoter, Public Category	Non-Promoter, Public Category
13	Mandeep Singh Pahwa	Non-Promoter, Public Category	Non-Promoter, Public Category
14	Sri Radhaballabh Securities Private Limited	Non-Promoter, Public Category	Non-Promoter, Public Category
15	Shubham Agarwal	Non-Promoter, Public Category	Non-Promoter, Public Category
16	Vanita Behal	Non-Promoter, Public Category	Non-Promoter, Public Category
17	Naveen Behal	Non-Promoter, Public Category	Non-Promoter, Public Category
18	Shreya Aggarwal	Non-Promoter, Public Category	Non-Promoter, Public Category
19	Amit Garg	Non-Promoter, Public Category	Non-Promoter, Public Category
20	Munish Garg	Non-Promoter, Public Category	Non-Promoter, Public Category
21	Henil Pankaj Sheth	Non-Promoter, Public Category	Non-Promoter, Public Category
22	Akshay Kokra	Non-Promoter, Public Category	Non-Promoter, Public Category
23	Sukhwant Singh	Non-Promoter, Public Category	Non-Promoter, Public Category
24	Seema Singla	Non-Promoter, Public Category	Non-Promoter, Public Category
25	Ruchi Singla	Non-Promoter, Public Category	Non-Promoter, Public Category
26	Rajesh Kumar Jain	Non-Promoter, Public Category	Non-Promoter, Public Category
27	Poonam Jain	Non-Promoter, Public Category	Non-Promoter, Public Category

28	Siddhesh Jagannath Salunkhe	Non-Promoter, Public Category	Non-Promoter, Public Category
29	Manish Dalal	Non-Promoter, Public Category	Non-Promoter, Public Category
30	Devendra Kumar Goel	Non-Promoter, Public Category	Non-Promoter, Public Category
31	Gogri Neelam Divyesh	Non-Promoter, Public Category	Non-Promoter, Public Category
32	Aditya Vinay Madnani	Non-Promoter, Public Category	Non-Promoter, Public Category
33	Harjeet Kaur	Non-Promoter, Public Category	Non-Promoter, Public Category
34	ONS Steel Solutions LLP	Non-Promoter, Public Category	Non-Promoter, Public Category
35	Narain Dass Singla	Non-Promoter, Public Category	Non-Promoter, Public Category
36	Gopal Bansal	Non-Promoter, Public Category	Non-Promoter, Public Category
37	Reema Gupta	Non-Promoter, Public Category	Non-Promoter, Public Category
38	Pratima Yadav	Non-Promoter, Public Category	Non-Promoter, Public Category
39	Gourav Singh	Non-Promoter, Public Category	Non-Promoter, Public Category

13. The intent of the promoters, directors, key managerial personnel or senior management of the Company to subscribe to the offer:

The below allottees, who belong to promoter/ promoter group category are subscribing to the issue to the extent of number of warrants proposed to be issued, written against his name, as detailed in the following table:

S. No.	Proposed Allottees	Category	No of Warrants
1	M/s Himani Steels Private Limited	Promoter/Promoter Group	62,03,000

Except above said Proposed Allottee, none of the promoters, directors, key managerial personnel or senior management promoters are subscribing any warrants in the proposed issue.

14. Pre and Post issue shareholding pattern of the Company:

The shareholding pattern of the Company before and after the proposed preferential issue will be as under:

Category	Pre-Issue Shareholding$		Warrants to be allotted	Post Issue Shareholding (Considering full conversion of warrants)*	
	No. of fully paid up equity shares held	%		No. of fully paid up equity shares held	%
A) Promoter Shareholding					
Indian					
a) Individuals & HUF	47,94,600	30.84	0	47,94,600	18.92
b) Body Corporates	0	0.00	62,03,000	62,03,000	24.47
c) Any Other (specify)	0	0.00	0	0	0.00
Sub Total (A1)	**47,94,600**	**30.84**	**62,03,000**	**1,09,97,600**	**43.39**
2) Foreign Promoters (A2)	0	0.00	0	0	0.00
Total Promoter Shareholding A=A1 +A2	**47,94,600**	**30.84**	**62,03,000**	**1,09,97,600**	**43.39**
B) Public Shareholding					
B1) Institutions (Domestic)	0	0.00	0	0	0.00
B2) Institutions (Foreign)	0	0.00	0	0	0.00
B3) Central Govt./State Govt./POI	0	0.00	0	0	0.00
B4) Others					
a) Individuals	83,80,236	53.89	34,72,000	1,18,52,236	46.76
b) Body Corporate	11,83,200	7.61	1,00,000	12,83,200	5.06
c) NRI	97,600	0.63	0	97,600	0.39
d) Others (HUF, Firms, Trust, LLP)	10,92,400	7.03	25,000	11,17,400	4.41
Total Public Shareholding B=B1+B2+ B3+B4	**1,07,53,436**	**69.16**	**35,97,000**	**1,43,50,436**	**56.61**
C) Non-Promoter - Non-Public	0	0.00	0	0	0.00
Total Share Capital(A+B+C)	**1,55,48,036**	**100.00**	**98,00,000**	**2,53,48,036**	**100.00**

(1) $The pre-issue shareholding pattern is based on the latest BENPOS available with the Company i.e. October 02, 2026

*(2)*Post shareholding pattern has been prepared on the basis of post preferential issue capital on fully diluted basis i.e. Rs. 25,34,80,360/- divided into 2,53,48,036 Equity Shares of Rs. 10/- (Rupees Ten Only) each assuming full conversion of warrants into equity shares.*

(3) Post shareholding structure may change depending upon any other corporate action in between.

15. The identity of the natural persons who are the ultimate beneficial owners of the warrants proposed to be allotted and / or who ultimately control the proposed allottee(s) and the percentage of post preferential issue capital that may be held by them:

S. No.	Name	Pre-Issue Shareholding Structure		No. of Warrants To be Allotted	Post Equity Shareholding (Presuming full conversion of Warrants)		Name of ultimate beneficial owners
		No. of shares$	*%$*		*No. of shares*	*%#*	
1	M/s Himani Steels Private Limited	0	0.00	62,03,000	62,03,000	24.47	Mrs. Nikita Singla; Mrs. Shukla Singla and Mr. Rakesh Garg
2	Ajay Pandey	33,200	0.21	5,00,000	5,33,200	2.10	NA@
3	Rajesh Agarwal	0	0.00	2,75,000	2,75,000	1.08	NA@
4	Shiv Sehgal	0	0.00	2,00,000	2,00,000	0.79	NA@
5	Vikram Bansal	0	0.00	2,00,000	2,00,000	0.79	NA@
6	Dharmendra Narpatlal Zaveri	0	0.00	1,50,000	1,50,000	0.59	NA@
7	Uma Rani	0	0.00	1,50,000	1,50,000	0.59	NA@
8	Rohit D Gupta	0	0.00	1,00,000	1,00,000	0.39	NA@
9	Amit Kumar	0	0.00	1,00,000	1,00,000	0.39	NA@
10	Raghav Agarwal	0	0.00	1,00,000	1,00,000	0.39	NA@
11	Vinay Arunkumar Sanklecha	0	0.00	1,00,000	1,00,000	0.39	NA@
12	Rishi Pahwa	0	0.00	1,00,000	1,00,000	0.39	NA@
13	Mandeep Singh Pahwa	0	0.00	1,00,000	1,00,000	0.39	NA@
14	Sri Radhaballabh Securities Private Limited	0	0.00	1,00,000	1,00,000	0.39	Ms. Kusum Agrawal
15	Shubham Agarwal	0	0.00	1,00,000	1,00,000	0.39	NA@
16	Vanita Behal	0	0.00	1,00,000	1,00,000	0.39	NA@
17	Naveen Behal	0	0.00	1,00,000	1,00,000	0.39	NA@
18	Shreya Aggarwal	0	0.00	1,00,000	1,00,000	0.39	NA@
19	Amit Garg	0	0.00	1,00,000	1,00,000	0.39	NA@

20	Munish Garg	0	0.00	1,00,000	1,00,000	0.39	NA@
21	Henil Pankaj Sheth	0	0.00	80,000	80,000	0.32	NA@
22	Akshay Kokra	0	0.00	70,000	70,000	0.28	NA@
23	Sukhwant Singh	20,000	0.13	50,000	70,000	0.28	NA@
24	Seema Singla	400	0.00	50,000	50,400	0.20	NA@
25	Ruchi Singla	400	0.00	50,000	50,400	0.20	NA@
26	Rajesh Kumar Jain	0	0.00	50,000	50,000	0.20	NA@
27	Poonam Jain	0	0.00	50,000	50,000	0.20	NA@
28	Siddhesh Jagannath Salunkhe	0	0.00	50,000	50,000	0.20	NA@
29	Manish Dalal	0	0.00	50,000	50,000	0.20	NA@
30	Devendra Kumar Goel	0	0.00	50,000	50,000	0.20	NA@
31	Gogri Neelam Divyesh	0	0.00	50,000	50,000	0.20	NA@
32	Aditya Vinay Madnani	0	0.00	50,000	50,000	0.20	NA@
33	Harjeet Kaur	0	0.00	40,000	40,000	0.16	NA@
34	ONS Steel Solutions LLP	7,200	0.05	25,000	32,200	0.13	Mr. Narain Dass Singla and Mrs. Seema Singla
35	Narain Dass Singla	1,600	0.01	25,000	26,600	0.11	NA@
36	Gopal Bansal	0	0.00	25,000	25,000	0.10	NA@
37	Reema Gupta	0	0.00	25,000	25,000	0.10	NA@
38	Pratima Yadav	0	0.00	25,000	25,000	0.10	NA@
39	Gourav Singh	0	0.00	7,000	7,000	0.03	NA@

@being individual

$The pre-issue holding of the allotee is as on latest BENPOS available with the Company i.e. October 02, 2026 and These percentages have been calculated on the basis of pre issue capital i.e. Rs. 15,54,80,360 divided into 1,55,48,036 Equity Shares of Rs. 10/- (Rupees Ten Only) each.

#These percentages have been calculated on the basis of post preferential issue capital on fully diluted basis i.e. Rs. 25,34,80,360/- divided into 2,53,48,036 Equity Shares of Rs. 10/- (Rupees Ten Only) each assuming full conversion of warrants into equity shares.

16. Proposed time limit within which the allotment shall be completed:

In terms of Regulation 170 of the SEBI ICDR Regulations, preferential allotment of said warrants will be completed within a period of 15 (fifteen) days from the date of passing of such resolution provided that where the issue and allotment of said warrants is pending on account of pendency of any approval for such issue and allotment by the Stock Exchange(s) and/or Regulatory Authorities, or Central Government, the issue and allotment shall be completed within the period of 15 days from the date of last such approval or within such further period/s as may be prescribed or allowed by the SEBI, the Stock Exchange(s) and/or Regulatory Authorities etc.

17. Change in control, if any, in the Company consequent to the preferential issue:

As a result of the proposed preferential issue, there will be no change in the control or management of the Company pursuant to the proposed preferential issue. However, voting rights will change in tandem with the change in shareholding pattern of the Company.

18. The number of persons to whom allotment on preferential basis have already been made during the year, in terms of number of securities as well as price:

During the financial year 2026–27, the Company has not made any allotment of securities on a preferential basis till date, except for the present proposed issue.

19. Contribution being made by the promoters or directors either as part of the offer or separately in furtherance of objects:

The contribution being made by the Promoter/Promoter Group as part of the offer is as under:

S. No.	Proposed Allottees	Category	No. of Warrants
1	M/s Himani Steels Private Limited	Promoter/Promoter Group	62,03,000

Except above, no other contribution is being made by the Promoters or Directors either as part of the offer or separately in furtherance of objects.

20. Lock-in Period:

a) The Warrants / equity shares to be allotted upon conversion of Warrants shall be under lock-in in accordance with Chapter V of ICDR Regulations.

b) The entire pre-preferential allotment shareholding of the Proposed Allottee, shall be locked-in as per Chapter V of the SEBI ICDR Regulations.

21. Certificate from Practicing Company Secretary:

The Certificate from Mr. Sahil Malhotra (COP: 14791), Practicing Company Secretary, certifying that the preferential issue of warrants is being made in accordance with requirements of Chapter V of SEBI ICDR Regulations has been obtained considering the said preferential issue. The copy of said certificate may be accessed on the Company's website https://www.suranisteel.com/images/Compliance_Certificate_under_Regulation.pdf

22. Undertakings:

i) None of the Company, its Promoters or Directors are categorized as wilful defaulter or a fraudulent borrower by any bank or financial institution or consortium thereof, in accordance with the guidelines on wilful defaulters issued by Reserve Bank of India. Consequently, the undertaking required under Regulation 163(1)(i) of ICDR Regulations is not applicable.

ii) As the equity shares of the Company have been listed on a recognized Stock Exchange for a period of more than 90 trading days as on Relevant Date, the provisions of Regulation 164(3) of ICDR Regulations governing re-computation of the price of shares shall not be applicable. Consequently, the undertakings required under Regulation 163(1)(g) and 163(1)(h) of ICDR Regulations are not applicable.

iii) None of the Company's Directors or Promoters are fugitive economic offenders as defined under ICDR Regulations.

iv) The Company do not have any outstanding dues to the SEBI, stock exchanges or the depositories.

v) Since the paid-up share capital of the Company may exceed ₹25 Crores upon conversion of all the Warrants, the Company confirms that it shall comply with the applicable provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, applicable to companies listed on the Main Board of the Stock Exchange(s). Further, in the event of any non-compliance, the Company shall be liable for payment of such fine/penalty and/or any other action as may be prescribed under the applicable SEBI Standard Operating Procedure (SOP).

   The Company shall ensure submission of its quarterly financial results within the timelines specified under Regulation 33(3)(a) or Regulation 33(3)(d) of the SEBI LODR Regulations, 2015, as applicable, where the date of allotment of the Warrants, pursuant to which the paid-up share capital of the Company would exceed ₹25 Crores, falls during the relevant quarter or after the end of such quarter but on or before the due date for submission of the said financial results.

vi) The Company hereby undertakes that it is in compliance with the requirements relating to maintenance of the Structured Digital Database (SDD) in accordance with Regulations 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, which, inter alia, require every listed entity to maintain a Structured Digital Database containing the requisite information in the manner prescribed under the said Regulations.

In terms of Sections 42 and 62 of the Act, approval of Members by way of special resolution is required for the resolution as set out in Item No. 3 of this Notice. Hence, the Board recommends the resolution proposed at Item No. 3 for your approval by way of a special resolution.

None of the Directors or Key Managerial Personnel of the Company, or their relatives, are in any way concerned or interested, financially or otherwise, in the resolution set out at Item No. 3 of this Notice, except to the extent of their respective shareholding, if any, in the Company.

For and on behalf of Surani Steel Tubes Limited

Sd/-
Vijay Singla
Managing Director
DIN: 00156801

Date: October 7, 2026
Place: Gujarat

ANU AND ASSOCIATES
CHARTERED ACCOUNTANTS

H. No. 1081, Sector 27 B,
Chandigarh – 160 019
Phone: +91 94631 15663
e-mail: parveenkumar459@gmail.com

To,

The Board of Directors
Surani Steel Tubes Limited
Corporate Identification Number L27109GJ2012PLC071373
S. No. 110, 115, Opp. Vinayak TMT, Bayad Road,
Tal. Dahegam, Gandhinagar, Sampa, Gujarat, 382315

Practicing Chartered Accountant's Certificate pursuant to Regulation 45 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

1. The report is issued in accordance with the terms of our engagement.

2. We have been required by the management Surani Steel Tubes Limited (the 'Company' or 'Surani'), to issue a certificate certifying the compliance of with conditions prescribed under sub-regulation (1) of regulation 45 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Regulation') for change of name of the Company from "Surani Steel Tubes Limited" to "Singlon Limited".

Management Responsibility

3. The management of the Company is responsible for the preparation and maintenance of all accounting and other records and documents supporting the particulars as mentioned in this certificate. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation and presentation of the Statement and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.

4. The management is also responsible for ensuring that the Company complies with the requirements of the Regulation.

Practitioner's Responsibility

5. Our responsibility is to provide a reasonable assurance, based on the procedures performed and evidence obtained, as to whether anything has come to our attention that causes to believe that the particulars as mentioned in this certificate is not in accordance with the underlying supporting documents maintained by the Company.

6. 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.

7. 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.

Opinion

8. Based on the procedure performed as outlined above and the representation provided to us, and on the basis of information and explanation provided to us by the management, we confirm that:

Regulation	Particulars	Our Opinion
45(1)(a)	A time period of at least one year has elapsed from the last name change	The Company has not changed its name since the last one year.
45(1)(b)	At least fifty percent of the total revenue in the preceding one-year period has been accounted for by the new activity suggested by the new name	Not applicable, as there is no change in the activity/ project of the Company in the preceding one-year period. Further, the proposed change in the name of the Company from "Surani Steels Tubes Limited" to "Singlon Limited" is intended to more appropriately signify and reflect the existing business activities of the Company.
45(1)(c)	The amount invested in the new activity/project is at least fifty percent of the assets of the listed entity	Not applicable, as there is no change in the activity/ project of the Company. Further, the proposed change in the name of the Company from "Surani Steels Tubes Limited" to "Singlon Limited" is intended to more appropriately signify and reflect the existing business activities of the Company.

Restriction on Use

9. This report is addressed to and provided to the Board of Directors of the Company and they can include it in explanatory statement of the Notice of the General Meeting and any intimation to the Stock Exchange and should not used by any other person. Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this report is shown or into whose hands it may come without our prior consent in writing.

for **Anu and Associates**
Chartered Accountants
ICAI Firm Registration Number 019624N

PARVEEN KUMAR

Digitally signed by PARVEEN KUMAR
Date: 2026.10.06 18:02:35 +05'30'

Parveen Kumar
FCA., Partner
Membership Number 531655
UDIN: 26531655CKUFBE6683
Date: October 6, 2026
Place: Chandigarh