



Vivek Surana & Associates
Practicing Company Secretaries

Annexure IV

Format of the confirmation to be submitted by the Statutory Auditors/ Practicing Chartered Accountant/ Practicing Company Secretary on their letterhead:

The Chief General Manager
Listing Operation,
BSE Limited,
20th Floor, P. J. Towers,
Dalal Street,
Mumbai – 400 001.

Dear Sir,

Sub: Application for “In-principle approval” prior to issue and allotment of 2,39,25,000 Convertible warrants on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

We, Vivek Surana & Associates, Practicing Company Secretaries, have verified the relevant records and documents of variman Global Enterprises Limited with respect to the proposed preferential issue by the company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

- a) None of the proposed allottee(s) has/ have sold any equity shares of the company during the 90 trading days preceding the relevant date. Further, where the proposed allottee(s) is/ are promoter/ promoter group entity, then none of entities in the promoter and promoter group entities has/ have sold any equity share of the company during the 90 trading days preceding the relevant date.
- b) The following allottees does not hold any equity shares of the issuer for a period starting from the relevant date till the date of preferential allotment.

S.no.	Identity of proposed Preferential Allottees
A.	Promoters
1.	D. Manasvini
B.	Non- Promoters
1.	Cheralathan
2.	Madhusudan Securities Limited
3.	Sanivarapu Akhil Reddy
4.	Venkata Sesha Reddy Mudimela



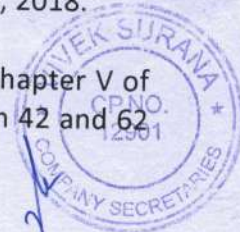
5.	Gudapu Reddy Sreedar Reddy
6.	Sirisha Vemury
7.	UmaV
8.	Navbharat Dwellings Private Limited
9.	Vishal Packaging
10.	Ogha Advisory Private Limited
11.	Anjali Gaba
12.	Jeevisha Jain
13.	Vansh Malhotra
14.	Aditi Vishwanath Sajjanar
15.	M. Sasidhar Rao
16.	Kakarla Manish
17.	Neha Agarwal
18.	Sitara. A
19.	Jeksani Sridevi
20.	Nikhil Kumar Sanghi
21.	Poornachandra Rao Pulivarthi
22.	V. Sushma Gupta
23.	Ajjarapu Visisht
24.	Ajjarapu Lakshmi Snigdha
25.	Gorthy Sarath Chandra

- c) The pre-preferential shareholding of each of proposed allottee(s) has been locked in accordance with Regulation 167 (6) SEBI (ICDR) Regulations, 2018. Further, there is no sale/ pledge of pre-preferential holding from (Relevant Date) till (date of lock-in). The details of allottee-wise pre-preferential shareholding and lock-in thereon is as given hereunder:

Name of Proposed Allottee	DP ID *	Pre-preferential holding	Lock-in details		Pledged with	Pledge end date
			From	To		
Srilatha	1204470008185913	11475000	24.04.2023	30.11.2023	NA	NA
Narasimha Rao Koppuravuri	1203320024559760	150	24.04.2023	30.11.2023	NA	NA

(*) client id/ folio no in case allottee hold the securities in physical form.

- d) None of the proposed allottees belonging to promoter(s) or the promoter group is ineligible for allotment in terms of Regulations 159 of SEBI (ICDR) Regulations, 2018.
- e) The proposed issue is being made in accordance with the requirements of Chapter V of SEBI (Issue of Capital and Disclosure Requirement) Regulations, 2018, Section 42 and 62.



of the Companies Act 2013 and Rule 14 of the Companies (Prospectus and Allotment of Securities) Rules, 2014 and other requirements of Companies Act, 2013. Further, the company has complied with all legal and statutory formalities and no statutory authority has restrained the company from issuing these proposed securities.

- f) The proposed preferential issue is being made in compliance with the provisions of Memorandum of Association (MoA) and Article of Association (AoA) of the company. It is further confirmed that for the proposed preferential issue, the price of the equity shares of the company has been determined in compliance with the valuation requirement as mentioned in the AoA of the company."
- g) ~~The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e. 2023-24 is more than 5% of the post issue fully diluted share capital of the issuer.~~

OR

The total allotment to the allottee or allottees acting in concert in the present preferential issue or in the same financial year i.e. 2023-24 is less than 5% of the post issue fully diluted share capital of the issuer.

For Vivek Surana & Associates



Vivek Surana
Proprietor

M. No.: A24531, C.P. No.: 12901

UDIN: A024531E000181006

PR: 1809/2022

Place: Hyderabad

Date: 24.04.2023