



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 4,60,00,000 Convertible warrants on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

We, Manoj Parakh & 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	Names of the Proposed Allottees/Investors
A.	Promoter Category
1	SIRISH DAYATA
B.	Public Category (Non-Promoter Category)
2	GLOBAL FOCUS FUND
3	VANEET AGGARWAL
4	VIVEK AGGARWAL
5	YAMASUA HIND PRIVATE LIMITED
6	SAMSUNG IMPEX PRIVATE LIMITED



7	SALIM PYARALI GOVANI
8	AG DYNAMIC FUNDS LIMITED
9	EMINENCE GLOBAL FUND PCC-EUBILIA CAPITAL PARTNER FUND
10	ELARA INDIA OPPORTUNITIES FUND LIMITED
11	ARIES OPPORTUNITIES FUND LIMITED
12	FORBES EMF
13	GOOD VIEW TRADING CO
14	FORESIGHT HOLDINGS PVT LTD
15	CHERALATHAN
16	JAIDEV RAJNIKANT SHROFF
17	ANIRUDH MOHTA
18	NACHIKET ANUP SHAH
19	ANKIT GERA
20	HEMANTSINGH NAHARSINGH JHALA
21	PRANAV JONEJA
22	AVADHUT NARAYAN PENDSE
23	AIYUB MOHAMED YACOOBALI
24	SANIVARAPU AKHIL REDDY
25	SHARDA SUBHASHCHANDRA BHAT
26	MINAL PRAKASH DESHPANDE
27	RAMESH S DESHPANDE
28	DIVYA DEVEN PATHAK
29	NITIN SHARMA
30	ZINNIA GLOBAL FUND PCC- CELL DEWCAP FUND
31	NOVA GLOBAL OPPORTUNITIES FUND PCC - TOUCHSTONE
32	PLURIS FUND LIMITED
33	VIKASA INDIA EIF I FUND
34	3 SIGMA GLOBAL FUND
35	NIKHIL SANTOSH OSWAL
36	VERTEX SUPPLIER PRIVATE LIMITED
37	BHAVYA AGARWAL (HUF)
38	MCG INVESTMENTS PRIVATE LIMITED
39	SAVIO GERARD PINTO
40	ANOOP JAIN
41	GARNET INTERNATIONAL LIMITED
42	SANAT NANDA
43	AIKYAM CAPITAL ADVISORS PRIVATE LIMITED
44	PRITI VIJAYKUMAR SHAH
45	IMPRESSIONS PORTFOLIO PRIVATE LIMITED
46	PISTA DEVI
47	CHANAKYA OPPORTUNITIES FUND I
48	HIMMAT PRATAP BHANUSHALI
49	SWATI NARENDRA KEKAN
50	MARPURI SASIDHAR RAO
51	DEAS HOME APPLIANCES LLP


 FCS: 8572
 CP: 8957
 VIZAG
 COMPANY SECRETARIES
 21/12/24

52	SUBHADRA SHUKLA
53	SRIRAM PAVAN KUMAR VEMURI
54	SIRISHA VEMURY
55	UMA V
56	UMASREE ATCHUTA
57	KARAMVIRSINGH HEMANTSINGH JHALA
58	PATEL DAHYABHAI JIVABHAI
59	VIPIN KUMAR JAIN (HUF)
60	VIPIN KUMAR JAIN
61	VANSH MALHOTRA
62	BHAVANA JAIN
63	M S GIRI
64	OGHA ADVISORY PRIVATE LIMITED
65	A VENKATA REDDI BABU
66	DEEPAK KUMAR CHAUDHARY
67	VISHAL GUPTA
68	AARNAV CHAUDHARY
69	SHREEPRIYA CHAUDHARY
70	RAM KUMAR GIRI
71	JASMINEKAUR MANINDERSINGH CHANDHOK
72	SITARA A
73	NIKHIL KUMAR SANGHI
74	DEVARANNAGARI PRANEETH KUMAR REDDY
75	MAYANK SECURITIES PRIVATE LIMITED
76	AJJARAPU LAKSHMI SNIGDHA
77	SUMAN SURANA
78	AJJARAPU BHAVANI
79	MUDIGONDA DURGA PRASAD
80	NISHANDAR SANGRAMSINH P
81	SVV DURGA PRASAD RAO

Ultimate Beneficiary holders:

Sl. No	Name of the proposed Allottee	Name of the Ultimate Beneficial Owner
1	Global Focus Fund	Vijay Goel
2	Yamasua Hind Private Limited	Kussh Satija Saumaya Satija
3	Samsung Impex Private Limited	Kussh Satija Saumaya Satija
4	AG Dynamic Funds Limited	Paul Boskma
5	Eminence Global Fund PCC-Eubilia Capital Partner Fund	Grigor Jabishvili
6	Elara India Opportunities Fund Limited	Rajendra Bhatt



7	Aries Opportunities Fund Limited	Nitin Singhal
8	Forbes EMF	Li Hoy Choo Li Kim For
9	Good View Trading Co	Bineet Agarwal Lekha Agarwal Manoj Kumar Bafna Vijeta Bafna
10	Foresight Holdings PVT LTD	Salim Pyarali Govani Sausan Bukhari
11	Zinnia Global Fund PCC- Cell Dewcap FUND	Low Ren Feng
12	Nova Global Opportunities Fund PCC - Touchstone	Padam Khurana
13	Pluris Fund Limited	Robert Dan Benjamin
14	Vikasa India EIF I Fund	Mark Rankin Dorsey Randall Buttram
15	3 Sigma Global Fund	Rachit Agarwal
16	Vertex Supplier Private Limited	Jatan Devi Bachhawat Chainrup Bachhawat
17	Bhavya Agarwal (HUF)	Bhavya Agarwal
18	MCG Investments Private Limited	Shivang M Golchha ** Sayuj M Golchha
19	Garnet International Limited	Not Applicable since Listed Company
20	Aikyam Capital Advisors Private Limited	Nilesh Choudhary Megha Choudhary
21	Impressions Portfolio Private Limited	Puneet Kumar Bansal
22	*Chanakya Opportunities Fund I	mentioned below
23	Deas Home Appliances LLP	Aarnav Chaudhary Deepak Kumar Chaudhary
24	Vipin Kumar Jain (HUF)	Vipin Kumar Jain
25	Ogha Advisory Private Limited	Narasimha Rao Koppuravuri
26	Mayank Securities Private Limited	Mayyank Jain

*Chanakya Opportunities Fund I AIF ("COF") is a scheme launched under Chanakya Fund Trust which is registered with the Securities and Exchange Board of India as a Category II Alternative Investment Fund under SEBI registration number IN/AIF2/22-23/1230. As of date, the number of investors in Chanakya Opportunities Fund I is 55 and the following beneficiaries directly hold 10% or more beneficial interest in Chanakya Opportunities Fund I:

Name of beneficial owner	% of beneficial Interest
* Steptrade Share Services Private Limited	19.48



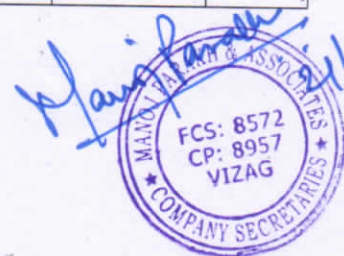
(Sponsor and Investment Manager of Chanakya Opportunities Fund I)

* There is only one natural person who are considered ultimate beneficial owners that exercise control or ultimately have a controlling ownership interest of 25% or more of the shares or capital or profits of Steprade Share Services Private Limited.

Name of beneficial owner	% of beneficial Interest
Kresha Gupta	83.30%

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		
Vaneet Aggarwal	1203330001360123	52122	13.02.2024	30.09.2024	NA	NA
Vivek Aggarwal	1203330001360328	100	13.02.2024	30.09.2024	NA	NA
Nikhil Santosh Oswal	1203000001191115	100000	13.02.2024	30.09.2024	NA	NA
Umasree Atchuta	1201350000100401	1190	13.02.2024	30.09.2024	NA	NA
M S Giri	1204770000189143	87500	13.02.2024	30.09.2024	NA	NA
Mudigonda Durga Prasad	1202060002187842	600	13.02.2024	30.09.2024	NA	NA
Foresight Holdings Pvt. Ltd	1203290000000202	493000	13.02.2024	30.09.2024	NA	NA
			13.02.2024	30.09.2024	6000000 Equity Shares-Northeast Broking Services Ltd	22-01-2026
Sirish Dayata	IN30226910071055	38536200			827713 Equity Shares-KNAB Finance Advisors Pvt Ltd	06.06.2024
Foresight Holdings Pvt. Ltd	IN30509930031610	250000	13.02.2024	30.09.2024	NA	NA
Hemant singh Naharsingh Jhala	IN30412310001621	100000	13.02.2024	30.09.2024	NA	NA



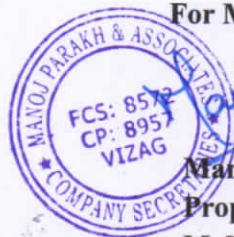
Nova Global Opportunities Fund Pcc - Touchstone	IN30362210071597	200000	13.02.2024	30.09.2024	NA	NA
Bhavana Jain	IN30340310032583	5000	13.02.2024	30.09.2024	NA	NA
Deepak Kumar Chaudhary	IN30302831029462	50000	13.02.2024	30.09.2024	NA	NA
Mayank Securities Private Limited	IN30249610001914	30000	13.02.2024	30.09.2024	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 Manoj Parakh & Associates

Manoj Parakh
Proprietor

M. No.: F8572, C.P. No.: 8957

UDIN:F008572E003469722

PR: 3439/2023

Place: Visakhapatnam

Date: 21.02.2024