

**Annexure IV**

To,
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 40,00,000 Warrants convertible into Equity Shares on preferential basis under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

We, M/s. Ronak Jhuthawat & Co., Practicing Company Secretary, have verified the relevant records and documents of **Lehar Footwears Limited** with respect to the proposed issue of Warrants convertible into Equity Shares on preferential basis by the Company as per Chapter V of SEBI (ICDR) Regulations, 2018 and certify that:

- 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.
- 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 the Proposed Allottee	DP ID *	Qty	Lock-in details	
			From	To
Naresh Kumar Agarwal	IN30198310887351	12,68,566	21.09.2022	01.04.2023
Raj Kumar Agarwal	1201060500153506	14,92,618	19.09.2022	31.03.2023
Pramod Kumar Agarwal	1201060500153510	11,13,632	19.09.2022	31.03.2023
Lakshita Agarwal	IN30143681654968	1,017	21.09.2022	01.04.2023
Naveen Kumar Agarwal	1201060500153525	6,46,191	19.09.2022	31.03.2023
	IN30198310836312	24,769	21.09.2022	01.04.2023
Megha Agarwal	1201060500153485	1,85,655	19.09.2022	31.03.2023
Sanjay Kumar Agarwal	1201060500180901	73,000	19.09.2022	31.03.2023
	IN30198310836329	90,222	21.09.2022	01.04.2023
	IN30302850133208	1,87,500	21.09.2022	01.04.2023



Megha Agarwal	-	-	-
Pankaj Agarwal	1203450000117070	1,12,500	19.09.2022 to 31.03.2023
	IN30198310836345	38,865	21.09.2022 to 01.04.2023
Shally Agarwal	-	-	-
Prateek Agarwal	IN30198310836337	29,722	21.09.2022 to 01.04.2023
Divya Gupta	IN30154962984136	58,825	21.09.2022 to 01.04.2023
Pooja Agarwal	1201090017508826	10,554	19.09.2022 to 31.03.2023
	IN30143681652745	13,529	21.09.2022 to 01.04.2023
Saroj Devi	-	-	-
Dinesh Kumar Gupta	1206690001291782	1,200	19.09.2022 to 31.03.2023
Manju Gupta	1206690000685458	6,000	19.09.2022 to 31.03.2023
Navita Goyal	-	-	-
Savita Kumari Agarwal	-	-	-
Latadevi Anilkumar Gadia	IN30154918180446	3,800	21.09.2022 to 01.04.2023
Rakesh Kumar Soni	-	-	-
Vinod Mishra	-	-	-
Rahul Porwal	-	-	-
Govind Saboo	-	-	-
Kapil S Somani HUF	-	-	-
Kaylin Realty Private Limited	-	-	-
Manju Goyal	-	-	-
Neena Saboo	-	-	-
Vidya Gupta	-	-	-
Sangeeta Gupta	-	-	-
Lal Bahadur Singh Chaudhary	-	-	-

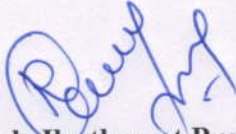
(*) client id/ folio no in case allottee hold the securities in physical form

- c) 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.
- d) The proposed issue of warrants convertible into Equity Shares 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 Warrants.
- e) The proposed preferential issue of warrants convertible into Equity Shares is being made in compliance with the provisions of Memorandum of Association (MoA) and Article of Association (AoA) of the Company. The Articles of Association of the Issuer does not provide for a method of determination which results in a floor price higher than that determined under ICDR Regulations, 2018.



- f) The total allotment to the allottee or allottees acting in concert in the present preferential issue of warrants convertible into Equity Shares or in the same financial year i.e. 40,00,000 Warrants is more than 5% of the post issue fully diluted share capital of the issuer.

For **Ronak Jhuthawat & Co**
Company Secretaries
Peer Review: 1270/2021



Ronak Jhuthawat Proprietor
FCS No.: 9738
CP No.: 12094
UDIN F009738D001295462

Date: October 19, 2022
Place : Udaipur