

October 06, 2025

To,
Securities and Exchange Board of India
Corporation Finance Department
Division of Issues and Listing
Plot No. C4 A, G Block
Bandra Kurla Complex, Bandra (East)
Mumbai 400 051, Maharashtra, India



Dear Sir/Madam,

Ref: Proposed initial public offering of equity shares of face value of ₹ 10 each ("Equity Shares") of Om Galaxy Limited (the "Issuer" or the "Company")

Sub: Request for exemption from strict enforcement of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("SEBI ICDR Regulations") under Regulation 300(1)(c) of the SEBI ICDR Regulations, from disclosing Santosh Nair (Brother of Spouse of Jyotish Rajamohanam Nambiar), Preetha Raghavan (Sister of Sathyapalan Ayadathil Poyil) (collectively the "Relevant Persons") and entities in which they may have an interest as a part of the "promoter group" of the Company (as defined under Regulation 2(1)(pp) of the SEBI ICDR Regulations in the Issue related documents.

1. Background

1.1. Our Company was incorporated as a private limited company as "Om Galaxy Precision Mould Crafts Private Limited", under the Companies Act, 1956, pursuant to a certificate of incorporation dated October 08, 2008 issued by the Registrar of Companies, Maharashtra at Mumbai. Further, the name of our Company was changed to "Om Galaxy Private Limited" and a fresh certificate of incorporation dated October 16, 2024 was issued by Registrar of Companies, Central Processing Centre. Subsequently, our Company was converted into a public limited company pursuant to a resolution passed by our Board of Directors in its meeting held on October 19, 2024 and by the Shareholders in an extraordinary general meeting held on October 24, 2024 and consequently the name of our Company was changed to "Om Galaxy Limited" and a fresh certificate of incorporation dated December 09, 2024 was issued by the Registrar of Companies, Central Processing Centre. The Corporate Identity Number of our Company is U33127MH2008PLC187382.

1.2. Our Company's registered office is situated at 4/5/6, Blue Chip No 5, Industrial Estate, Sativali Road, Village Waliv, Vasai, Thane, Maharashtra-401208, India. Our Company is engaged into the business of manufacturing all types of moulds for the use in injection mouldings, blow mouldings, compression mouldings, pressure dye caste moulds, sheet metal dyes, press tool, thermos forming, extrusions and any other fabrication or processing and to manufacture or help in the manufacturing of any spare parts, accessories or anything or things required and necessary for the abovementioned business. Our Company is also in the business of manufacturing of products for plastic household products, kitchen products and other artificial and synthetic materials.

1.3. Subject to market conditions, receipt of the necessary consents and approvals and other considerations, Our Company is proposing to undertake the Issue and proposes to file the Draft Red Herring Prospectus ("DRHP"), Red Herring Prospectus ("RHP"), the Prospectus ("Prospectus") and, together, with the DRHP, the RHP and any other documents issued by our Company in relation to the Issue or any other documents issued by our Company in relation to the Issue (the "Issue Documents") with the SME Platform of BSE Limited/ Emerge platform of National Stock Exchange of India Limited, as the case may be ("Stock Exchange"), the Securities and Exchange Board of India ("SEBI"), and the Registrar of Companies, Maharashtra at Mumbai ("RoC") in relation to the Issue in accordance with the provisions of the Companies Act, 2013 and SEBI ICDR Regulations.

1.4. Our Company has appointed Indorient Financial Services Limited as the Book Running Lead Manager to manage the Issue.

2. Identification of Promoter Group

2.1. For the purposes of the Issue, in accordance with the relevant provisions of the Companies Act, 2013 and SEBI ICDR Regulations (i) Opindersingh Bachattarsingh Baddhan; (ii) Jyotish Rajamohanam Nambiar; (iii) Sathyapalan Ayadathil Poyil; (iv) Meena O Baddhan; and (v) Gagandeep Opinder Singh Baddhan (collectively the "Promoters") have been identified as the Promoters of our Company. As on the date of this application, our Promoters collectively holds 100.00% (two shareholders hold negligible shares) of the pre-Issue issued, subscribed and paid up Equity Share capital of our Company. The details of the shareholding pattern of our Company as on the date of this application is enclosed as Annexure A.

2.2. In connection with the Issue, our Company is required to identify and disclose the "promoter group" in terms of Regulation 2(1)(pp) of the SEBI ICDR Regulations in Issue Documents and certain confirmations/information is required to be disclosed in the Issue Documents. In terms of Regulation 2(1)(pp) of the SEBI ICDR Regulations, the term 'promoter group' has been defined to include the following:

(ii) *an immediate relative of the promoter (i.e., any spouse of that person, or any parent, brother, sister or child of the person or of the spouse; and*

(iv) *in case the promoter is an individual:*

A) *any body corporate in which twenty per cent. or more of the equity share capital is held by the promoter or an immediate relative of the promoter or a firm or Hindu Undivided Family in which the promoter or any one or more of their relative is a member;*

B) *any body corporate in which a body corporate as provided in (A) above holds twenty per cent. or more, of the equity share capital; and*

C) *any Hindu Undivided Family or firm in which the aggregate share of the promoter and their relatives is equal to or more than twenty per cent. of the total capital..."*

2.3. In view of the above definition of "promoter group" as per SEBI ICDR Regulations, (i) Santosh Naik i.e. Brother of Spouse of Jyotish Rajamohanam Nambiar and (ii) Preetha Raghavan i.e. Sister of Sathyapalan Ayadathil Poyil (collectively the "Relevant Persons") and (a) any body corporate in which 20% or more of the equity share capital is held by any of the Relevant Persons or a firm or a Hindu Undivided Family in which any of the Relevant Persons is a

- member; (b) any body corporate in which a body corporate mentioned in (a) above, holds 20% or more of its equity share capital; and (c) any Hindu Undivided Family or firm in which the aggregate share of the Relevant Persons, is equal to or more than 20% of the total capital (collectively the "Connected Entities") also qualify to form part of the promoter group, of the promoters of our Company and in respect of whom the relevant information, confirmations and undertakings is required to be included with respect to the members of the promoter group of our Company in the Issue Documents in terms of the applicable provisions of the SEBI ICDR Regulations.
- 2.4. However, no such information, confirmations or undertaking will be included in the Issue Documents in respect of the Relevant Members and the Connected Entities as the Relevant Members has not responded to our request despite repeated attempts (as mentioned in paragraph 3.1 below) in obtaining the relevant confirmations, information and certifications required to be disclosed in the Issue Documents in terms of SEBI ICDR Regulations.
- 2.5. Hence, our Company seeks an exemption from disclosing (i) Santosh Nair i.e. Brother of Spouse of Jyotish Rajamohanam Nambiar and (ii) Preetha Raghavan i.e. Sister of Sathyapalan Ayadathil Poyil and the Connected Entities as part of the Promoter Group in the Issue Documents and therefore making any disclosures pertaining to the Relevant Persons and the Connected Entities in the Issue Documents.
3. **Grounds for seeking exemption from the requirement of including an individual and the entities held by the said individuals as a part of the promoter group**
- 3.1. Our Company from time to time had issued letters via registered post to seek their consent and information of all the identified members of promoter group including the Relevant Persons to their last available address. However, none of the Relevant Persons has responded to our letters and neither provided any information required to be disclosed in terms of SEBI ICDR Regulations despite repeated attempts made by our Company. The details of the letters sent to the Relevant Persons are disclosed in Annexure B.
- 3.2. In view of the above, we will not be able to disclose the following information in the Issue Documents:
- (i) certain immediate relatives of our Promoters; (ii) body corporates in which 20% or more of the equity share capital is held by such immediate relatives or any Hindu undivided families or firms of which such immediate relatives are members; (iii) body corporates in which the body corporates referred to in (ii) hold 20% or more of the equity share capital; and (iv) Hindu undivided families or firms in which the aggregate shareholding of such persons is equal to 20% or more of the total capital.
- 3.3. Further, please note that as on the date of this application, we confirm the following:
- a) the Relevant Persons and Connected Entities do not hold any shares or debt or other securities of any class, directly or indirectly in our Company or hold any financial interest in our Company.
 - b) Relevant Persons and Connected Entities do not (directly or indirectly) have any role in the management, promotion, control/influence nor have any rights, representation, interest, responsibility or obligation (whether as promoter, director, officer, employee, or otherwise, as the case may be) in the business or operations of our Company or in any of the entities forming a part of our Promoter Group (except in the entities in which the Relevant Persons) may have an interest).
 - c) Neither, the Relevant Persons are on the Board of Directors of our Company or the entities forming a part of our Promoter Group (except in the entities in which the Relevant Persons

Head Office: Om Galaxy Limited

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may have an interest) nor does any of them have any representative on the board of directors of the Company.

3.4. As on date, neither any of the Relevant Persons or Connected Entities has entered into any related party transactions with our Company or is/are associated with our Company in the capacity of a vendor or supplier or client nor does they have any special rights with respect to the Company through any formal or informal arrangements. The details of the related party transactions of the Company in the past three financial years, being Fiscal 2025, Fiscal 2024 and Fiscal 2023, are enclosed in Annexure C as per the audited financial statements of the Company. Further, we confirm that our Company has not carried out any related party transaction with the Relevant Persons or Connected Entities from April 01, 2025 till the date of filing of this application.

3.5. Accordingly, our Company is unable to comply with the requirements prescribed under Schedule VI of the SEBI ICDR Regulations and other applicable provisions of SEBI ICDR Regulations due to the reasons mentioned in this application and which are beyond the control of our Company.

4. Exemption sought

4.1. Regulation 300(1)(c) of the SEBI ICDR Regulations empowers SEBI to relax the strict enforcement of the requirements under the SEBI ICDR Regulations including non-compliance caused due to factors beyond the control of our Company.

4.2. As indicated in paragraph 3 above, our Company is unable to make relevant disclosures in relation to Santosh Nair and Preetha Raghavan and any entities they may be interested in. Accordingly, we request you to kindly provide our Company an exemption under Regulation 300(1)(c) of the SEBI ICDR Regulations from classifying and disclosing Santosh Nair and Preetha Raghavan and the Connected Entities, as members of the Promoter Group of our Company and from disclosing information, confirmations and undertakings with respect to any of them in the Issue Documents.

5. Payment of fees

5.1. The fee of ₹ 1,00,000 (Rupees One Lakhs only), along with ₹ 18,000 (Rupees Eighteen Thousand only) towards GST, has been made through the payment gateway available at SEBI intermediary portal on <https://eservices.sebi.gov.in/paymentmodule> bearing receipt no. 252791458677 towards the fee as per Regulation 300 of the SEBI ICDR Regulations for consideration of this exemption application.



OM GALAXY LIMITED

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For any further queries, you may please contact:

COMPANY:	BOOK RUNNING LEAD MANAGER
Om Galaxy Limited Address: 4/5/6 Blue Chip No 5, Industrial Estate , Sativali Road , Village Valiv, Vasai, Thane, Maharashtra, India, 401208 Name: Opindersingh Bachattarsingh Baddhan Designation: Managing Director Contact No.: +91 98210 62914 Email: opindersingh.1962@gmail.com / project.om@omgalaxymould.com	Indorient Financial Services Limited Address: B/805, Rustomjee Central Park, Andheri Kurla Road, Chakala, Mumbai – 400093, Maharashtra, India Name: Prashant Dhebar / Neha Maiyan Contact No.: +91 98209 39205 / +91 86919 76351 Email: project.om@indorient.in

Thanking you,

Yours Sincerely,

For Om Galaxy Limited

Authorized Signatory



Copy to:

Book Running Lead Manager to the Issue

Indorient Financial Services Limited
B/805, Rustomjee Central Park,
Andheri Kurla Road, Chakala,
Mumbai – 400093, Maharashtra, India

Encl:

Copies of the letters sent to Santosh Nair and Preetha Raghavan as mentioned in Annexure D.

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Annexure A

Shareholding Pattern as on date

S. No	Name of Shareholder	Number of Equity Shares	Percentage of pre-Issue Equity Share capital
1.	Opindersingh Bachattarsingh Baddhan	7,43,676	40.18 %
2.	Jyothish Rajamohanam Nambiar	4,62,484	24.99 %
3.	Sathyapalan Ayadathil Poyil	2,78,400	15.04 %
4.	Meena O Baddhan	2,69,391	14.55 %
5.	Gagandeep Opinder Singh Baddhan	96,949	5.24 %
6.	Monika Kaur Gagandeep Singh Baddhan	01	Negligible
7.	Sajitha Jyothish	01	Negligible
	Total	18,50,902	100%

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Annexure B

S No.	Name of the Person	Relation	Registered Post sent on
1.	Santosh Nair	Brother of Spouse of Jyotish Rajamohanan Nambiar	August 8, 2025, August 22, 2025 and August 29, 2025
2.	Preetha Raghavan	Sister of Sathyapalan Ayadathil Poyil	August 8, 2025, August 22, 2025 and August 29, 2025

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Annexure C

Details of the related party transactions of the Company

List of Related Parties & their Relationships

Name of the Persons	Relationship
M/s Om Enterprises	Proprietorship of Mr Opindersingh Bachattarsingh Baddhan
Opindersingh Bachattarsingh Baddhan	Director
Jyothish Rajamohanam Nambiar	Director
Sathyapalan Ayadathil Poyil	Director
Meena O Baddhan	Wife of Director
Infuse HRS Private Limited	Subsidiary Company
Gagandeep Opinder Singh Baddhan	Director
Neo Venture	Proprietor of Sathyapalan Poyil
Galaxy Mould & Tools	Proprietor of Jyothish Nambiar HUF
OMG Auto Mould Private Limited	Subsidiary Company
Nandakumar Puthiya Veetil	Director of OMG Auto Mould Private Limited
Jawaharlal Maurya	Director of Infuse HRS Private Limited
Adithyan Sathyapal	Son of Director

B) Transactions during the period with Related parties

S. No	Name of the related party	Nature of Transaction	For the financial year ended March 31, 2025 (Amount in ₹) (Consolidated)	For the financial year ended March 31, 2024 (Amount in ₹) (Consolidated)	For the financial year ended March 31, 2023 (Amount in ₹) (Consolidated)
1.	Opindersingh Bachattarsingh Baddhan	Remuneration	91,00,000	82,22,500	74,75,000
2.	Jyothish Rajamohanam Nambiar	Remuneration	65,00,000	57,55,750	52,32,500
3.	Sathyapalan Ayadathil Poyil	Remuneration	65,00,000	57,55,750	52,32,500
4.	Gagandeep Opinder Singh Baddhan	Remuneration	34,40,320	-	-
5.	Gagandeep Opinder Singh Baddhan	Salary	24,09,680	31,87,800	28,98,000
6.	Om Enterprises	Labour Job	1,38,13,000	-	-
7.	Om Enterprises	Purchase of goods	-	23,804,000	49,222,716
8.	Om Enterprises	Advances against Material	1,29,70,504	-	-
9.	Om Enterprises	Labour job by OMG Auto Mould Private Limited	1,12,82,000	-	-
10.	Opindersingh Bachattarsingh Baddhan	Factory Rent	38,58,600	37,17,000	18,88,000
11.	Opindersingh Bachattarsingh Baddhan	Interest On Loan	27,56,550	-	-



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12.	Infuse HRS Private Limited	Purchase of goods	1,76,10,950	1,21,70,337.00	13,69,661
13.	OMG Auto Mould Private Limited	Purchase of goods	-	-	2,20,45,940
14.	Meena O Baddhan	Factory Rent	13,20,000	-	-
15.	Neo Venture	Advances given against services	22,61,000	-	-
16.	Galaxy Mould & Tools	Advances given against services	12,75,000	-	-
17.	Nandakumar Puthiya Veettil	Remuneration paid in OMG Auto Mould Private Limited	39,00,000	36,00,000	37,88,000
18.	Jawaharlal Maurya	Remuneration paid in Infuse HRS Private Limited	11,19,650	-	-
19.	Adithyan Sathyapal	Remuneration paid in Infuse HRS Private Limited	7,00,553	-	-

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