



**Regd. Office :** E-894, D.S.I.I.D.C Industrial Area, Narela, Delhi-110040  
**Corp. Office :** KD- 249, Ground floor, Pitampura , Delhi-110034  
**Contact :** 011-45611750, Mob.: 9711260180  
**Email :** primecableindustries@gmail.com,  
 info@primecabindia.com  
**Web :** www.primecabinida.com

January 31, 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 ₹ 5 each ("Equity Shares") of Prime Cable Industries 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 (i) Tirath Raj Singla (Father of Purshotam Singla and father in law of Vijay Laxmi Singla), (ii) Parveen Kumar (Brother of Purshotam Singla and Brother in law of Vijay Laxmi Singla), (iii) Sushma Goel and Manu Goyal (Sisters of Purshotam Singla and Sister in law of Vijay Laxmi Singla), (iv) Balram Garg, and Amar Chand Garg (Brothers of Vijay Laxmi Singla and Brother in law of Purshotam Singla), (v) Murti Gupta, Chaman Aggarwal and Rajbala Aggarwal (Sisters of Vijay Laxmi Singla and Sister in law of Purshotam Singla); and (vi) entities in which such individuals may have an interest) as a part of the "promoter group" of the Company.

**1. Background**

- 1.1. Our Company was originally incorporated as a private limited company in the name and style of "R C Cable Private Limited" under the provisions of the Companies Act, 1956 vide certificate of incorporation dated May 12, 2008 bearing Corporate Identity Number U31905DL2008PTC177989 issued by Registrar of Companies, National Capital Territory of Delhi and Haryana at New Delhi. The name of our Company was changed to "Prime Cables Industries Private Limited" pursuant to a Board resolution dated January 18, 2019 and a special resolution dated January 22, 2019 passed by the Shareholders, consequent upon which, a fresh certificate of incorporation dated February 22, 2019 was issued by the Registrar of Companies, Delhi. Subsequently, our Company was converted into a public limited company and the name of our Company was changed from "Prime Cables Industries Private Limited" to "Prime Cables Industries Limited" and a fresh certificate of incorporation was issued on December 18, 2024 by the Registrar of Companies, Central Registration Centre. The Corporate Identification Number of our Company is U31905DL2008PLC177989.
- 1.2. Our Company's registered office is situated at E- 894, DSIDC Industrial Area Narela, Delhi, 110040, India. The Company is in the business of manufacturing of cables and wires.
- 1.3. Subject to receipt of the necessary consents and approvals and other considerations, the Company is in the process of preparing a draft red herring prospectus ("DRHP") in relation to the initial public offering of its Equity Shares by way of fresh issuance and by way of offer for sale by certain selling shareholders in accordance with Chapter IX of the SEBI ICDR Regulations, the Companies Act, 2013, as amended and other applicable Laws (the "Offer").





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- 1.4. The Company has appointed Indorient Financial Services Limited as Book Running Lead Manager to the Offer.
2. **Identification of Promoter Group**
  - 2.1. Presently, the Company has four Promoters, (1) Purshotam Singla who currently holds 6,96,000 paid-up equity share capital of our Company; (2) Vijay Lakshmi Singla who currently holds 1,76,730 paid-up share equity capital of our Company; (3) Naman Singla who currently holds 1,76,846 paid-up equity share capital of our Company; and (4) Nikunj Singla who currently holds 1,37,704 paid-up equity share capital of our Company. The shareholding pattern of the Company as on the date of this application is enclosed as **Annexure A**.
  - 2.2. In relation to our Promoters and the individuals and entities forming part of the promoter group, as defined under Regulation (2)(l)(pp) of the SEBI ICDR Regulations, are as enclosed in **Annexure B**, in respect of whom the relevant information, confirmations and undertakings as required in terms of the applicable provisions of the SEBI ICDR Regulations, to be included with respect to the members of the promoter group of the Company will be included in the DRHP, Red Herring Prospectus and the Prospectus (collectively, the "**Offer Documents**").
  - 2.3. However, no such information, confirmations or undertaking will be included in the DRHP in respect of (i) Tirath Raj Singla (Father of Purshotam Singla and father in law of Vijay Laxmi Singla), (ii) Parveen Kumar (Brother of Purshotam Singla and Brother in law of Vijay Laxmi Singla), (iii) Sushma Goel and Manu Goyal (Sister of Purshotam Singla and Sister in law of Vijay Laxmi Singla), (iv) Balram Garg and Amar Chand Garg (Brothers of Vijay Laxmi Singla and Brother in law of Purshotam Singla), (v) Murti Gupta, Chaman Aggarwal and Rajbala Aggarwal (Sisters of Vijay Laxmi Singla and Sister in law of Purshotam Singla); and (vi) entities in which such individuals may have an interest, in accordance with the SEBI ICDR Regulations ("**Disassociated Group**").
  - 2.4. Further, please note that the Disassociated Group does not hold any shares in the Company as on the date of this application. They do not (directly or indirectly) have any role in the management or operations of the Company or in any of the entities forming a part of our Promoter Group (except in the entities in which the members of Disassociated Group may have an interest). Neither any of the member of Disassociated Group is 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 members of Disassociated Group may have an interest) nor does any of them have any representative on the board of directors of the Company or hold any Equity Shares or other securities of our Company.
  - 2.5. As on date, neither any of the member of Disassociated Group has entered into any related party transactions with the Company or is associated with the Company in the capacity of a vendor or supplier or client and does not have any special rights with respect to the Company through any formal or informal arrangements. The details of the related party transactions with the Company in the past three financial years, being FY 2024, FY 2023 and FY 2022, are enclosed in **Annexure C**. Further, we confirm that the Company has not carried out any related party transaction with the members of the Disassociated Group from April 01, 2024 till the date of filing of this application.
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**





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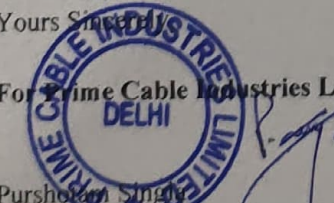
- 3.1. Our Company had issued letters via registered post to seek their consent and information of all the identified members of promoter group including the members of Disassociated Group. The details of the letters/mail sent are disclosed in **Annexure D**.
- 3.2. However, the members of the Disassociated Group (except for Mr. Tirath Raj Singla (Father of Purshotam Singla and father-in-law of Vijay Laxmi Singla) have conveyed their unwillingness to be identified as the members of promoter group and to provide their consents by way of an email/by post. The details of the refusal mail/letters are disclosed in **Annexure E**. Further, Mr. Tirath Raj Singla aged 76 years (Father of Purshotam Singla and father-in-law of Vijay Laxmi Singla) has not responded to our mails and letters and neither provided any information required to be disclosed in terms of SEBI ICDR Regulations.
- 3.3. In view of the above, we will not be able to disclose the following information in the Offer 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.
- 3.4. We submit that the requirements under the SEBI ICDR Regulations as set out in this application above 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 the Issuer.
- 4.2. As indicated in paragraph 2 above, as the Company is unable to make relevant disclosures in relation to the Disassociated Group and any entities they may be interested in. Accordingly, we request you to provide the Company an exemption under Regulation 300(1)(c) of the SEBI ICDR Regulations from classifying and disclosing the Disassociated Group and any entities they may be interested in, as members of the promoter group of the Company and from disclosing information, confirmations and undertakings with respect to any of them in the Offer Documents.
- 5. Payment of fees**
- 5.1. The fee of ₹ 1,00,000 (Rupees One Lakh only), along with ₹ 18,000 (Rupees Eighteen Thousand only) towards GST, has been made through the payment gateway available at SEBI intermediary portal on 01.02.2025 bearing payment reference no. ZHDFSMJ0C66GA3 and bank reference id 250320659736 towards the fee as per Regulation 300 of the SEBI ICDR Regulations for consideration of this exemption application.

Thanking you,

Yours Sincerely,

For Prime Cable Industries Limited

Purshotam Singla





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**Chairman & Managing Director**

**Copy to:**

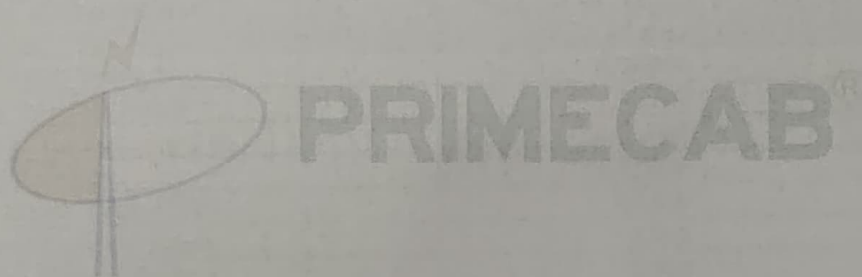
**Book Running Lead Manager to the Offer**

**Indorient Financial Services Limited**

A-501, Executive Spaces,  
Rustomjee Central Park  
Andheri Kurla Road, Chakala,  
Mumbai- 400093, Maharashtra

**Encl:**

Copies of the registered post and the emails sent to Tirath Raj Singla, Parveen Kumar, Sushma Goel, Manu Goyal, Balram Garg, Amar Chand Garg, Chaman Aggarwal, Murti Gupta and Rajbala Aggarwal 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.	Purshotam Singla	6,96,000	55.73
2.	Vijay Lakshmi Singla	1,76,730	11.03
3.	Naman Singla	1,76,846	14.15
4.	Nikunj Singla	1,37,704	14.16
5.	Purshotam Singla HUF	57,500	4.60
6.	Yashna Kathuria Singla	2,000	0.16
7.	Shreya Jhalani Singla	2,000	0.16
	<b>Total</b>	<b>12,48,780</b>	<b>100</b>

**Unit-I**

E-894, D.S.I.I.D.C. Industrial Area,  
Narela, Delhi-110040

**Unit-II**

C-60, RIICO Industrial Area, Neemrana,  
Ghilothe, Alwar, Rajasthan-301705



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**Annexure B**

The following natural persons form part of the Promoter Group as relatives of Purshotam Singla:

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)	Spouse of the promoter	Vijay Lakshmi Singla
	Father of the promoter	Tirath Raj Singla
	Mother of the promoter	Late Suchitra Devi Singla
	Brother of the promoter	Parveen Kumar
	Sister of the promoter	Sushma Goel and Manu Goyal
	Son of the promoter	Naman Singla and Nikunj Singla
	Daughter of the promoter	Not Applicable
	Father of the spouse of the promoter	Late Bal Krishan Das
	Mother of the spouse of the promoter	Late Ratan Devi
	Brother of the spouse of the promoter	Balram Garg and Amar Chand Garg
	Sister of the spouse of the promoter	Murti Gupta, Kusum Jain, Rajbala Aggarwal and Chaman Aggarwal.
	Son of the spouse of the promoter	Naman Singla and Nikunj Singla
	Daughter of the spouse of the promoter	Not Applicable

The following natural persons form part of the Promoter Group as relatives of Vijay Lakshmi Singla:

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)	Spouse of the promoter	Purshotam Singla
	Father of the promoter	Late Bal Krishan Das
	Mother of the promoter	Late Ratan Devi
	Brother of the promoter	Balram Garg and Amar Chand Garg
	Sister of the promoter	Murti Gupta, Kusum Jain, Rajbala Aggarwal and Chaman Aggarwal
	Son of the promoter	Naman Singla and Nikunj Singla
	Daughter of the promoter	Not Applicable
	Father of the spouse of the promoter	Tirath Raj Singla
	Mother of the spouse of the promoter	Late Suchitra Devi Singla
	Brother of the spouse of the promoter	Parveen Kumar
	Sister of the spouse of the promoter	Sushma Goel and Manu Goyal
	Son of the spouse of the promoter	Naman Singla and Nikunj Singla
	Daughter of the spouse of the promoter	Not Applicable

**Unit-I**

E-894, D.S.I.I.D.C. Industrial Area,  
Narela, Delhi-110040

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Wires & Cables

**Unit-II**

C-60, RIICO Industrial Area, Neemrana,  
Ghiloth, Alwar, Rajasthan-301705





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The following natural persons form part of the Promoter Group as relatives of Naman Singla:

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)	Spouse of the promoter	Shreya Jhalani Singla
	Father of the promoter	Purshotam Singla
	Mother of the promoter	Vijay Lakshmi Singla
	Brother of the promoter	Nikunj Singla
	Sister of the promoter	Not Applicable
	Son of the promoter	Not Applicable
	Daughter of the promoter	Rua Singla (Minor)
	Father of the spouse of the promoter	Anil Jhalani
	Mother of the spouse of the promoter	Uma Jhalani
	Brother of the spouse of the promoter	Vishesh Jhalani
	Sister of the spouse of the promoter	Not Applicable
	Son of the spouse of the promoter	Not Applicable
	Daughter of the spouse of the promoter	Rua Singla (Minor)

The following natural persons form part of the Promoter Group as relatives of Nikunj Singla:

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)	Spouse of the promoter	Yashna Kathuria Singla
	Father of the promoter	Purshotam Singla
	Mother of the promoter	Vijay Lakshmi Singla
	Brother of the promoter	Naman Singla
	Sister of the promoter	Not Applicable
	Son of the promoter	Not Applicable
	Daughter of the promoter	Not Applicable
	Father of the spouse of the promoter	Mukesh Kathuria
	Mother of the spouse of the promoter	Anju Kathuria
	Brother of the spouse of the promoter	Not Applicable
	Sister of the spouse of the promoter	Ishita Kathuria
	Son of the spouse of the promoter	Not Applicable
	Daughter of the spouse of the promoter	Not Applicable



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## Annexure C

## Details of the related party transactions with the Company

(₹ in Lakhs)

S. No	Name of the related party	Nature of Transaction	As at 31 March 2024	As at 31 March 2023	As at 31 March 2022
1.	Purshotam Singla	Director Remuneration	36.00	25.00	18.00
		Rent	10.18	13.80	13.80
		Interest on loan	17.43	1.33	-
		Loan Repaid	142.50	3.74	3.00
		Loan Received	416.76	74.14	3.00
2.	Naman Singla	Director Remuneration	30.00	22.00	13.50
		Interest on USL Paid	2.96	4.54	2.62
		Loan Repaid	82.00	17.68	8.85
		Loan Received	64.00	41.01	44.50
3.	Nikunj Singla	Director Remuneration	30.00	22.00	13.50
		Interest on Loan Paid	2.56	0.80	1.63
		Loan Repaid	39.00	45.08	10.35
		Loan Received	80.00	39.69	35.00
4.	Purshotam Singla (HUF)	Interest on Loan	0.17	0.24	2.44
		Loan Repaid	-	31.30	7.00
		Loan Received	20.02	0.80	5.00
5.	Vijay Laxmi Singla	Interest on Loan	11.36	10.74	8.79
		Loan Repaid	70.00	5.37	1.50
		Loan Received	26.13	7.09	-
6.	Shreya Jalani Singla	Interest on Loan	0.16	-	-
		Loan Received	25.00	-	-
		Loan Repaid	1.00	-	-
		Remuneration	6.00	4.80	-



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Web : www.primecabinida.com

## Annexure D

S. No.	Name of the Person	Relation	Registered Post sent on	Email sent on
1.	Tirath Raj Singla	Father of Purshotam Singla and father-in-law of Vijay Laxmi Singla	December 24, 2024, January 6, 2025 & January 17, 2025	-
2.	Parveen Kumar	Brother of Purshotam Singla and Brother-in-law of Vijay Laxmi Singla	December 24, 2024, January 6, 2025 & January 17, 2025	-
3.	Sushma Goel	Sister of Purshotam Singla and Sister-in-law of Vijay Laxmi Singla	December 24, 2024, January 6, 2025 & January 17, 2025	-
4.	Manu Goyal	Sister of Purshotam Singla and Sister-in-law of Vijay Laxmi Singla	December 24, 2024 & January 6, 2025	January 7, 2025
5.	Balram Garg	Brother of Vijay Laxmi Singla and Brother-in-law of Purshotam Singla	December 24, 2024, January 6, 2025 & January 17, 2025	-
6.	Amar Chand Garg	Brother of Vijay Laxmi Singla and Brother-in-law of Purshotam Singla	December 24, 2024, January 6, 2025 & January 17, 2025	-
7.	Chaman Aggarwal	Sister of Vijay Laxmi Singla and Sister-in-law of Purshotam Singla	-	January 18, 2025
8.	Murti Gupta	Sister of Vijay Laxmi Singla and Sister-in-law of Purshotam Singla	January 11, 2025, January 17, 2025	January 11, 2025 January 18, 2025
9.	Rajbala Aggarwal	Sister of Vijay Laxmi Singla and Sister-in-law of Purshotam Singla	January 6, 2025	December 24, 2024 January 06, 2025



Unit-I

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Ghilothe, Alwar, Rajasthan-301705



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info@primecabindia.com**Web :** www.primecabinida.com**Annexure E**

S. No.	Name of the Person	Relation	Date of refusal email/letter
1.	Tirath Raj Singla	Father of Purshotam Singla and father-in-law of Vijay Laxmi Singla	-
2.	Parveen Kumar	Brother of Purshotam Singla and Brother-in-law of Vijay Laxmi Singla	January 20, 2025
3.	Sushma Goel	Sister of Purshotam Singla and Sister-in-law of Vijay Laxmi Singla	January 20, 2025
4.	Manu Goyal	Sister of Purshotam Singla and Sister-in-law of Vijay Laxmi Singla	January 07, 2025
5.	Balram Garg	Brother of Vijay Laxmi Singla and Brother-in-law of Purshotam Singla	January 18, 2025
6.	Amar Chand Garg	Brother of Vijay Laxmi Singla and Brother-in-law of Purshotam Singla	January 18, 2025
7.	Chaman Aggarwal	Sister of Vijay Laxmi Singla and Sister-in-law of Purshotam Singla	January 19, 2025
8.	Murti Gupta	Sister of Vijay Laxmi Singla and Sister-in-law of Purshotam Singla	January 21, 2025
9.	Rajbala Aggarwal	Sister of Vijay Laxmi Singla and Sister-in-law of Purshotam Singla	January 07, 2025







सहायक महाप्रबंधक Assistant General Manager  
निगम वित्त विभाग Corporation Finance Department  
RAC-Division of Issues and Listing 2  
Tel. (Direct): 022 - 2644 9704  
E-mail: [sonalp@sebi.gov.in](mailto:sonalp@sebi.gov.in)

SEBI/HO/CFD/RAC-DIL2/P/OW/2025/9054/1  
March 25, 2025

**Prime Cable Industries Limited**  
KD-249, Ground Floor,  
Ground Floor, Pitampura  
Delhi- 110034

Kind Attention: Mr. Purshotam Singh, Managing Director

**Sub- Application for seeking exemption under Regulation 300(1) (c) of SEBI ICDR Regulations in relation to the proposed IPO of Prime Cable Industries Limited (PCL/company).**

Sir,

1. This has reference to your letter dated January 31, 2025 on the captioned matter.
2. In the aforesaid communications, you have sought exemption under Regulation 300(1)(c) of the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 (hereinafter referred to as "ICDR Regulations") for relaxation from strict enforcement of Regulation 2 (1) (pp) of SEBI ICDR Regulations.
3. While seeking exemption, the company has *inter-alia* submitted the following:
  - i. PCL has *inter-alia* identified following entities as its promoter-group entities (hereinafter collectively referred as disassociated group):
    - a. Tirath Raj Singla (Father of Purshotam Singla and father in law of Vijay Laxmi Singla)
    - b. Parveen Kumar (Brother of Purshotam Singla and Brother in law of Vijay Laxmi Singla) Dr. Ashar Agarwal.
    - c. Sushma Goel (Sister of Purshotam Singla)
    - d. Manu Goyal (Sister in law of Vijay Laxmi Singla)
    - e. Balram Garg and Amar Chand Garg (Brothers of Vijay Laxmi Singla and Brother in law of Purshotam Singla)
    - f. Murti Gupta, Chaman Aggarwal and Rajbala Aggarwal (Sisters of Vijay Laxmi Singla and Sister in law of Purshotam Singla)
    - g. Entities in which above mentioned individuals may have an interest, as per the prescribed threshold under SEBI ICDR Regulations.
  - ii. PCL issued letters via registered post to seek their consent and information of all the identified members of promoter group including the members of Disassociated Group. However, the members of the Disassociated Group (except for Mr. Tirath Raj Singla

Page 1 of 2





(Father of Purshotam Singla and father-in-law of Vijay Laxmi Singla) have conveyed their unwillingness to be identified as the members of promoter group and to provide their consents by way of an email/by post.

- iii. Further, Mr. Tirath Raj Singla aged 76 years (Father of Purshotam Singla and father-in-law of Vijay Laxmi Singla) has not responded to PCL's mails and letters and neither provided any information required to be disclosed in terms of SEBI ICDR Regulations.
  - iv. Disassociated Group does not hold any shares in the Company as on the date of this application. They do not (directly or indirectly) have any role in the management or operations of the Company.
  - v. Neither any of the member of Disassociated Group is on the board of directors of our Company nor does any of them have any representative on the board of directors of the Company or hold any Equity Shares or other securities of our Company.
  - vi. As on date, neither any of the member of Disassociated Group has entered into any related party transactions with the Company or is associated with the Company in the capacity of a vendor or supplier or client and does not have any special rights with respect to the Company through any formal or informal arrangements.
4. Regulation 300 of the ICDR Regulations empowers the Board to relax strict enforcement of any requirement under the ICDR Regulations in case such requirements are procedural in nature or the non-compliance was caused due to factors beyond the control of the issuer.
5. From the submissions of the Company, it is observed that there is no other ground for seeking exemption except for the unwillingness to be classified as promoter group. Thus, the aforesaid application does not qualify under Regulation 300 of the ICDR Regulations.
6. Based on the circumstances of the case and the facts mentioned at para 3 above, exemption request of the Company has not been acceded to. You are, therefore, advised as under:
- a. To disclose disassociated group and their connected entities as promoter group and inform them about their inclusion as a promoter group entity.
  - b. An appropriate Risk Factor shall be included in the Issue Documents.
  - c. Applicable disclosures shall be made based on the information as available in the public domain.
  - d. Further, this letter along with all your aforementioned communications shall be part of material contracts and documents for inspection as disclosed in the offer documents.
7. The rejection is specific to the present case and shall not be treated as a precedent.

Yours faithfully,

  
Abhishek Ranjan