



Corporate Capital Ventures

(SEBI Registered Category I Merchant Bankers)

o/c

February 22, 2022

To,
Securities and Exchange Board of India
Eastern Regional Office
L&T Chambers
16, Camac Street
Kolkata – 700 017

K.A: Mr. Anjarul Shaikh, Assistant General Manager

Dear Madam,

Sub: Initial Public Offering by Uma Exports Limited (“Issue”).

This is in relation to the observation letter dated February 07, 2022, bearing no. No. SEBI/ERO/OW/2022/5128/1 (“SEBI Observation Letter”) issued by the Securities and Exchange Board of India (“SEBI”) in connection with the Draft Red Herring Prospectus dated September 25, 2021 (“DRHP”) of the Company filed with SEBI, in connection with the captioned Issue.

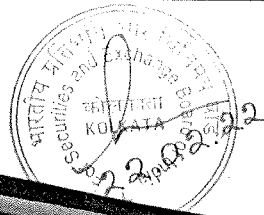
In this regard, based on the documents and supporting information made available to us by the Company, its management and our discussions with the Company’s officials, please find enclosed herewith the following:

- The ‘in – seriatim’ responses to your specific and general observations as stated in the SEBI Observation Letter is enclosed herewith as ‘Annexure I’.
- A copy of the updated DRHP (“UDRHP”) in track change mode to indicate the changes made to the DRHP (enclosed herewith as ‘Annexure II’) and a copy in clean mode (“RHP”) (enclosed herewith as ‘Annexure III’). In track changes, all insertions appear as underlined text while the deletions appear as strikethrough text. **The page references referred to in this letter relate to the relevant pages in the RHP.**
- Details of the processing fee as per Schedule III read with Regulation 71(6) of the SEBI ICDR Regulations as under:

Processing Fees for updation of offer document	Rs.30,000
UTR No.	000120681641
Dated	21-02-2021
Issuer Bank Account details for Fees Payment	Issuer Name: Uma Exports Limited Issuer Bank Account No.: 031251000013 Bank Name: ICICI Bank Limited IFSC Code: ICIC0000312 Branch Address: Gorky Terrace
Bank Details of SEBI for payment of fees	Beneficiary Name: Securities and Exchange Board of India Bank Account No. SEBIRCCFDOTHERS Type of Fees: MISCELLANEOUS Bank Name: ICICI Bank Ltd. IFSC Code: ICIC0000106

CERTIFIED TRUE COPY
For UMA EXPORTS LTD.

[Signature]



Corporate Capital Ventures Pvt. Ltd.

CIN: U74140DL2009PTC194657

B1/E13 First Floor, Mohan Cooperative Industrial Estate, Mathura Road, New Delhi-110 044, Tel: +91 11 4182 4066
Website: ccvindia.com, Email: info@ccvindia.com, ccvindiamb@gmail.com



Please see below the key updates since the filing of the DRHP in relation to the Company and the proposed Issue that have been included in the RHP:

1. In-principle listing approvals:

The Company has received in-principle approval from the BSE Limited (“BSE”) and National Stock Exchange of India Limited (“NSE”) pursuant to the letters dated November 03, 2021 and November 12, 2021 respectively. A copy of the in-principle approval letters from BSE and NSE have been filed with your office vide our email dated November 17, 2021. The observations / recommendations, if applicable, of BSE and NSE while granting the in-principle approvals have been appropriately incorporated.

2. Appointment of Monitoring Agency, Bankers to the Issue, Refund Banker and Sponsor Bank:

The Company is in process of appointment of Bankers to the Issue/ Refund Bank/ Escrow Collection Bank/ Allotment Bank/Sponsor Bankers. Necessary details in relation to the same will be intimated to SEBI and shall be incorporated in the RHP.

As the net proceeds of the Issue shall not exceed Rs.10,000 lakhs, under the SEBI ICDR Regulations, it is not required that a monitoring agency be appointed by the Company.

3. Other Updates

In accordance with SEBI ICDR Regulations, we have updated the chapter titled “Financial Information” with the Financial Information for the six months period ended September 30, 2021. Accordingly, necessary updates and amendments have been made in the chapters titled “Summary of Financial Information”, “Offer Document Summary”, “Risk Factors”, “Management’s Discussion and Analysis of Financial Position and Results of Operations”, “Government and Other Statutory Approvals” and “Other Regulatory and Statutory Disclosures” as well.

We have updated the information contained in the RHP including the chapters and/ or sections titled “The Issue”, “Basis for Issue Price”, “Our Business”, “Our Management”, “Our Group Companies”, “Other Regulatory and Statutory Disclosures”, “Issue Structure”, “Issue Procedure” and “Material Contracts and Documents for Inspection” to reflect the updates in the business and operations of the Company since the filing of the DRHP or changes or finalisation of certain terms of the Issue.

1. Clause-wise compliance of Schedule XVI (read with Regulation 71) of the SEBI ICDR Regulations is set out below:

a. Changes which require fresh filing of the draft offer document with SEBI, along with fees:

Sub Clause	Particulars	Comments
a.	Change in promoter of the Company	Not applicable
b.	Change in more than half of the Board of Directors of the Company	Not applicable
c.	Change in main object clause of the Company	Not applicable
d.	Any addition to Objects of the Issue resulting in an increase in estimated Issue size or estimated means of finance by more than twenty per cent.	Not applicable
e.	If there are grounds to believe that there is an exacerbation of risk on account of deletion of an object resulting in a decrease in the issue size by more than twenty per cent.	Not applicable
f.	Any Increase or Decrease: (i) In case of a fresh issue: any increase or decrease in estimated issue size by more than twenty per cent. of the estimated issue size; or (ii) In case of an offer for sale: any increase or decrease in either the number of shares offered for sale or the estimated issue size, by more than fifty per cent.; or (iii) In case of an issue comprising of both fresh issue and offer for sale: the respective limits as above shall apply.	Not applicable
g.	Any increase in estimated deployment in any of the Objects of the Issue by more than twenty per cent.	Not applicable
h.	Changes which may result in non-compliance with the provisions of the SEBI ICDR Regulations and the Lead Manager of the Issuer intend to seek relaxation under Regulation 303 of the SEBI ICDR Regulations.	Not applicable



b. Changes which require filing of the updated offer document with SEBI, along with fees:

Sr. No.	Particulars	Comments
i.	Section 1: Risk Factors: Any material development which may result in potential risk and may require updation in this section.	Applicable. Fees of Rs. 10,000 has been paid
ii.	Section 2: Capital Structure: An aggregate increase of 5 per cent or more in the shareholding of the promoter or promoter group or an aggregate increase of 5 per cent or more in the shareholding of the top ten shareholders.	Not applicable
iii.	Section 3: Issue Size: Any addition or deletion to the objects of the issue resulting in a change in the estimated issue size or estimated means of finance by more than 10 per cent and not exceeding 20 per cent.	Not applicable
iv.	Section 4: Management: Appointment of any new director.	Not applicable
v.	Section 5: Promoter Group: Any addition to the promoter group or group companies.	Not applicable
vi.	Section 6: Financial Statements: Any variation in net profit after tax or net loss after tax and/ or extraordinary items in excess of 10 per cent over the last updated financials submitted to SEBI.	Applicable. Fees of Rs. 10,000 has been paid
vii.	Section 7: Legal and other information: Any new litigation or any development about a pending litigation, which is considered material in view of the merchant bankers.	Applicable. Fees of Rs. 10,000 has been paid

We confirm that all amendments, suggestions and observations advised by SEBI have been complied with and duly incorporated in the RHP, to the extent required to comply with the observations made in the SEBI Observation Letter. This letter contains the changes made along with the relevant page numbers of the RHP in relation to amendments, suggestions and observations advised by SEBI *vide* the SEBI Observation Letter, which have been set out in **Annexure I**.

We undertake that all publicity/ advertisements would not contain matter extraneous to the information contained in the DRHP/UDRHP/RHP. We undertake to inform SEBI of any other changes carried out in the document until the time of filing of the RHP with SEBI and Stock Exchanges.

Except as stated otherwise, all capitalised terms used herein but not specifically defined shall have the same meaning ascribed to such term in the RHP.

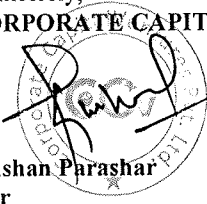
We trust that you find the explanations contained herein to be adequate.

Should you require any further information or clarification, please contact any of the following officials of:

Mr. Kulbhushan Parashar
Corporate Capitalventures Private Limited
B1/E13, First Floor, Mohan Co-operative Industrial Estate,
Mathura Road, New Delhi – 110044
Email: kp@ccvindia.com

Thanking you,

Yours sincerely,
For **CORPORATE CAPITALVENTURES PRIVATE LIMITED**


Kulbhushan Parashar
Director