Singhi & Co.
Chartered Accountants
161, Sarat Bose Road
Kolkata- 700 026, (India)
T: +91(0)33-2419 6000/01/02
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SDP & ASSOCIATES
Chartered Accountants
46C, Chowringhee Road, Flat No. 14A & 14G
Everest House, Kolkata- 700 071
T: 91-33-2288-2944/ 4007-5956/4003-5770
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To,
The Board of Directors,
Lumino Industries Limited
Unit No- 12/4, Merlin Acropolis 1858/1
Rajdanga Main Road, Kolkata- 700107,
West Bengal, India

AND

Motilal Oswal Investment Advisors Limited
Motilal Oswal Tower,
Rahimtullah Sayani Road,
Opposite Parel ST Depot, Prabhadevi,
Mumbai- 400025,
Maharashtra, India

JM Financial Limited
7thFloor, Cnergy,
Appasaheb Marathe Marg
Prabhadevi, Mumbai -400 025
Maharashtra, India

Monarch Networth Capital Limited
4th Floor, B Wing, Laxmi Tower, G Block,
Bandra Kurla Complex, Bandra (E),
Mumbai- 400051,
Maharashtra, India

(Motilal Oswal Investment Advisors Limited, JM Financial Limited and Monarch Networth Capital Limited are appointed and referred to as the "**Book Running Lead Managers**" or "**BRLMs**" in relation to the Offer)

Re: Proposed initial public offering of equity shares of face value of Rs. [5] each ("Equity Shares" and such offering, the "Offer") of 'Lumino Industries Limited' ("Company" or "Offeror"), comprising a fresh offer of up to [•] Equity Shares, aggregating up to ₹ [5,000] million, by the Company ("Fresh Issue") and an offer for sale ("Offer for Sale") of up to [•] Equity Shares, aggregating up to ₹ [2,000] million, by [Devendra Goel & Jay Goel] ("Selling Shareholders") ("Offer for Sale", and together with the Fresh Offer, the "Offer" and such Equity Shares, the "Offered Shares")

Sub: Certificate on outstanding dues to MSMEs, material creditors and other creditors

Dear Sirs / Madams,

We, Singhi & Co., Chartered Accountants (**FRN:** 302049E) and SDP & Associates, Chartered Accountants (**FRN:** 322176E), the present joint statutory auditors of the Company, have been informed by the Company that it proposes to undertake the proposed Offer in accordance with the provisions of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("**SEBI ICDR Regulations**") and the Companies Act, 2013, as amended ("**Companies Act**").

In connection with the Offer, we have been requested by the Company to provide certain confirmations in relation to outstanding dues to creditors (Trade Payables) of the Company as at 31 March 2026.

Singhi & Co. Chartered Accountants Kolkata

SDP & Associates Chartered Accountants Kolkata

Management Responsibility for the Statement

The preparation of the schedule of creditors (Trade Payables) including identifying micro, small and medium enterprises and material creditors (**Annexure A, B and C)** is the responsibility of the management of the Company including the responsibility for the maintenance of proper books of accounts and such other relevant records as prescribed by applicable laws, which includes collecting, collating, and validating data and designing, implementing and monitoring of internal controls.

The Management shall also be responsible for providing us the required information/documents as may be required by us for this certificate.

Further, the board of directors of the Company have, pursuant to the resolution dated 04 August 2025 approved that a creditor of the Company (on a consolidated basis), shall be considered to be material ("**Material Creditor**"), for disclosures in the red herring prospectus ("**RHP**") and the prospectus ("**Prospectus**") in relation to the Offer (collectively, the "**Offer Documents**"), if amounts due to such creditor exceeds 5% of the restated consolidated total trade payables of the Company as of the end of the latest period included in the Restated Consolidated Financial Information ("**Materiality Policy**"). A copy of the Materiality Policy is enclosed herewith as **Annexure D**.

Auditor's Responsibility

We conducted our examination of the schedule of creditors in accordance with the "Guidance Note on Reports or Certificates for Special Purposes (Revised 2016)" **("Guidance Note")** issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.

We have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements.

We have performed the procedures stated below with respect to amount outstanding to creditors of the Company as on 31st March 2026:

(i) Obtained the schedule of creditors along with outstanding balances, prepared by management of the Company, as on 31st March 2026 bifurcated into two categories (a) outstanding dues of small scale undertakings (as per the Micro, Small and Medium Enterprises Development Act, 2006) ("**MSME Scale Creditors**"), and (b) outstanding dues of creditors other than Small Scale Creditors ("**Other Creditors**"). The creditors were further divided into "material creditors" and "other than material creditors" based on the materiality policy of the Company.

(ii) Compared the amount outstanding as per the schedule obtained in (i) above with the Restated Consolidated Financial Information along with ledger accounts of creditors, minutes of the meetings of the Board of Directors ("**Board**") of the Company, minutes of annual general meetings and extra-ordinary general meetings of the Company, minutes of the meetings of various committees of the Board and bank statements of the Company for the Financial Year ended 31st March 2026.

(iii) Verified the categories MSME Creditors' and 'Other Creditors' from confirmations received from the creditors wherever available with the Company.

Conclusion

Based on the above procedures, information and explanations provided by the management of the Company, we confirm:

(i) As of 31st March 2026, there are no outstanding dues of creditors by the Company, except as disclosed in **Annexure A**.

(ii) As of 31st March 2026, the Company does not owe any amount to any micro, small and medium enterprises, other than as described in **Annexure B.**

SINGHI & CO. Chartered Accountants

SDP & ASSOCIATES Chartered Accountants KOLKATA

(iii) As of 31st March 2026, the Company does not owe any amount to any material creditor, other than as described in **Annexure C,** the summary of which has been provided in **Annexure A**. For the purposes of this disclosure, "material creditors" are identified in accordance with the materiality policy adopted by the Board of the Company by way of their resolution dated 04 August 2025, wherein a creditor of the Company shall be considered to be material for the purpose of disclosure in the Offer Documents if amounts due to such creditor exceed 5% of the restated consolidated total trade payables of the Company as per the latest Restated Consolidated Financial Information i.e., as at 31st March 2026 i.e. Rs.127.74 Million, and a copy of the Materiality Policy is enclosed herewith as **Annexure D.**

We confirm that the information above is true and correct and there is no untrue statement or omission which would render the contents of this letter misleading in its form or context.

Restriction on use and other clauses

This certificate is for information and for inclusion (in part or full) in the red herring prospectus ("**RHP**") and the prospectus ("**Prospectus**") which the Company intends to file with the Registrar of Companies, West Bengal (Kolkata-I at Kolkata) ("**RoC**") and thereafter file with the SEBI and the Stock Exchanges and in any other document in relation to the Offer (collectively, the "**Offer Documents**") or any other Offer related material, and may be relied upon by the Company, the BRLMs and the legal counsels to the Offer. We hereby consent to the submission of this certificate as may be necessary to the SEBI, the RoC, the Stock Exchanges and any other regulatory authority and/or for the records to be maintained by the BRLMs and in accordance with applicable law.

This certificate may be relied on by the BRLMs, their affiliates and legal counsels in relation to the Offer.

We confirm that we will immediately communicate any changes in writing in the above information to the Book Running Lead Managers until the date when the Equity Shares commence trading on the relevant stock exchanges. In the absence of any such communication from us, the Book Running Lead Managers and the legal advisors, each to the Company and the Book Running Lead Managers, can assume that there is no change to the above information until the Equity Shares commence trading on the relevant stock exchanges pursuant to the Offer.

All capitalized terms not defined herein bear the meaning ascribed to them in the Offer Documents.

Yours faithfully,

For and on behalf of M/s Singhi & Co.
Chartered Accountants
Firm Registration No.302049E

SINGHI & CO. * Chartered Accountants *

Navindra Kumar Surana
Partner
Membership No.: 053816
UDIN: 26053816AIKJCI9020
Place: Kolkata
Date: August 20,2026

For and on behalf of SDP & Associates
Chartered Accountants
Firm Registration No.322176E

Pranita Dalmia

SDP & ASSOCIATES * KOLKATA * Chartered Accountants

Pranita Dalmia
Partner
Membership No.: 062175
UDIN:26062175TIVAUP1372
Place: Kolkata
Date: August 20,2026

Encl: Annexure A to D.

CC:

Legal Counsel to the Company

Trilegal
18th and 19th Floor Godrej,
Golf Course Road, Sector 42,
Gurugram 122009, Haryana India

Legal Counsel to the BRLMs

M/s. Crawford Bayley & Co.
State Bank Buildings
N.G. N. Vaidya Marg
Fort, Mumbai 400 023
Maharashtra, India

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Annexure A

Details of Creditors as per Restated Consolidated Financial Information as at 31st March 2026

S. No.	Type of creditor	Number of creditors	Amount Outstanding (Rs. in Million)
1	Dues to micro, small and Medium enterprises (Excluding material creditor(s) included below)	454	683.86
2	Dues to Material Creditor(s) (Refer Annexure C & D)	3	984.71
3	Dues to other creditors (Excluding material creditor(s) included above)	718	886.15
Total		**1,175**	**2,554.72**

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LUMINO INDUSTRIES LTD. KOLKATA

Annexure B
Details of Micro, Small and Medium Enterprises Creditors as per Restated Consolidated Financial Information as at 31st March 2026

S. No.	Party Name	Amount Outstanding (Rs. in Million)
1	A2Z Labour Services Private Limited	222.53
2	Navayug Labour Contractors Pvt Ltd	49.89
3	Hightension Electrcial Equipments Pvt Ltd	36.28
4	Sanjay Casting & Engineering Company	32.27
5	Ronak Enterprises	26.09
6	Tacent Industries Private Limited	22.94
7	Pascal Switchcare India (P) Ltd.	20.70
8	Lan Engineering & Technologies Private Limited	20.05
9	Vijay Transmission Private Limited	18.24
10	Marudhar Ceramics Pvt Ltd	17.16
11	Lan Engineering & Technologies	17.02
12	UIC Udyog Limited	16.53
13	Shiram Infra	12.41
14	Prakash Parivahan	10.22
15	Wire Brigade Industries Pvt. Ltd.	9.83
16	Bharatiya Road Transport Private Limited	9.74
17	Faraday Electricals Private Limited	9.73
18	M/S S G Enterprises	8.67
19	Sri Ganapati Transport Corporation	7.79
20	Bikaner Porcelain Private Limited	6.91
21	Alok Transport Pvt Ltd	6.44
22	Asha Traders	6.33
23	Unistar Metals Private Limited	6.01
24	S.N Steels	5.80
25	Kalinga Cables And Conduit Company	5.80
26	Sheeld Construction Company	5.70
27	Road Cargo Movers Pvt. Ltd.	5.65
28	Bajrang Pole Industries Llp	5.31
29	Communique Concrete	5.13
30	Sjs Construction	4.95
31	Kashi Bishwanath Concrete Works	4.87
32	Monoj Bor Saikia	4.77
33	M S Associates	4.58
34	Jay Maa Kali Saw Mill	4.48
35	JP Infratel	3.97

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LUMINO INDUSTRIES LTD. KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
36	Ranjeet Singh Lodhi	3.93
37	Super Plastic	3.49
38	Narendra Kumar Construction and Suppliers	3.42
39	Aaishree Industries	3.41
40	Hayat Construction Company	3.39
41	Mahavir Construction	3.34
42	Bagnan Estates Private Limited	3.28
43	Ishwar Enterprises	3.24
44	Krishna Construction	3.17
45	Process Galvaniser	3.12
46	Maruti Enterprise	3.11
47	Windson Enterprise	3.09
48	Vollmer Associates	3.07
49	Engineers Enterprise	3.02
50	Gc Rajoria Precast Private Limited	2.98
51	M/S Dharmraj Infra	2.66
52	Global Force Management Services Private Limited	2.64
53	Bansal Polycab Private Limited	2.59
54	Pegu Hardware Shop	2.51
55	Krishna Traders	2.42
56	Khandelwal Pole Industries	2.38
57	Legion Energy Products Private Limited	2.36
58	Ashapura Construction Co	2.35
59	Supreme Road Transport Pvt Ltd	2.30
60	Vidhi Enterprises	2.17
61	S.N.P. Logistic	2.16
62	Ruhi Enterprises	2.14
63	Rkg Construction Company	2.13
64	National Infra	2.01
65	Om Sai Contruction	1.97
66	Lutfar Packing Box	1.92
67	Janvi Enterprises	1.88
68	Anurag Constructions	1.86
69	Sonaram Electrical Company	1.84
70	Rhine Jaybee Power Private Limited	1.77
71	Shankar Construction Co	1.75
72	Maa Sharda Associates	1.73
73	A S Constructions	1.73
74	Iac Electricals Pvt. Ltd. (Vendor)	1.72
75	Sasmal Electrical Works	1.67

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LUMINO INDUSTRIES LTD. KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
76	Chanda Constructions	1.63
77	Kalson Global	1.62
78	Prabhu Lal Jat	1.60
79	Om Builders	1.56
80	Galaxy And Globe Corporation	1.55
81	Ampeup Construction Private Limited	1.54
82	Pradeep Kumar	1.50
83	Dhruv Construction	1.50
84	Kunj Bihari Constructions	1.48
85	Senani Enterprises	1.48
86	Goodwill Transport Pvt. Ltd.	1.47
87	Poran Enterprise	1.46
88	Shri Krishna Enterprises	1.44
89	Shivrani Group	1.44
90	N B Enterprise	1.43
91	K K Constuction & Supplier	1.43
92	Sanchar Plastic	1.42
93	Gandhar Udyog	1.41
94	Shri Shyam Traders	1.40
95	Arun Poles Industries	1.37
96	Ankit Construction And Suppliers	1.36
97	Tathagat Construction	1.35
98	Satendra Singh Thekedar	1.33
99	Infinity Construction	1.32
100	Pratap Construction Company	1.31
101	Alam Enterprise	1.29
102	P R Enterpirses	1.29
103	Sandeep Mishra Electricals Works	1.28
104	Alibor Hussain	1.25
105	Satendra Construction Company	1.21
106	Axis Electrical Components (I) Pvt. Ltd.	1.21
107	Falak Constructions	1.19
108	Tapash Kumar Deb	1.16
109	Hariom Trading Company	1.16
110	Alif Technologies	1.15
111	Rudradip Infratech Private Limited	1.15
112	Raghuvanshi Enterprises	1.15
113	Sinahee Enterprises	1.11
114	Maa Vaishno Construction	1.11
115	Babbu Enterprises	1.10

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LUMINO INDUSTRIES LTD. KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
116	Shri Bala Ji Engineers	1.09
117	Bala Ji Enterprises	1.07
118	Aditya Construction	1.06
119	Mishra Enterprises	1.05
120	Amit Motors	1.05
121	Manik Das	1.05
122	Delta Electrical	1.05
123	Gaurav Enterprises	1.02
124	Shiv Construction	0.99
125	Jaid Electrician	0.99
126	Akhilesh Kumar Contractor	0.96
127	Anil Kumar Jha	0.89
128	Rawat Associates	0.87
129	Jasimuddin Construction	0.85
130	Deepjyoti Sarmah	0.85
131	Shubhi And Sons Company	0.84
132	Kamla Timber Supply & Wood Works	0.84
133	P. K. Construction	0.83
134	Jayshree Sales Agency	0.82
135	Marut Singh	0.82
136	Gem Polytech Industries Pvt Limited	0.80
137	Ashish Traders	0.79
138	Rina Karmakar	0.78
139	Global Engineers & Suppliers	0.76
140	Jyotsna Technical & Mechanical Services (P) Ltd	0.75
141	Solutionmart Infra Services	0.75
142	Shree Ram Enterprises	0.75
143	Poddar Pole Products	0.75
144	Kasturi Prestress Pvt. Ltd.	0.75
145	Tirupati Teleplast Pvt. Ltd.	0.75
146	Abo Tani & Sons (Opc) Private Limited	0.74
147	Pankaj Kumar Pinki Contractor	0.73
148	Orbit Power Engineering	0.73
149	Aalaboi Enterprise	0.73
150	Balaji Construction	0.72
151	M K Electrical	0.71
152	A.T.A. Enterprise	0.70
153	Shiv Enterprises	0.70
154	M.K Group	0.69
155	B&J Construction Company	0.69

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LUMINO INDUSTRIES LTD. ★ KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
156	Aarohi Enterprises	0.68
157	Barbhuyan Electricals	0.68
158	Saini Construction Contractor	0.66
159	Shiv Shakti Construction	0.66
160	New Shanti Transport Company	0.64
161	Hansika Group	0.64
162	Bharat Petro Centre	0.64
163	Padam Singh Dhakar	0.63
164	Ummed Singh	0.63
165	Md. Prawej	0.62
166	Sky Castle Construction Company	0.62
167	Rajesh Industrial Corporation	0.61
168	K D Construction	0.61
169	S D Enterprises	0.59
170	B-Hightech System	0.59
171	N And N Enterprise	0.59
172	Rudra Associate Padwaha	0.57
173	Vikash Enterprises	0.57
174	Vimlesh Kumar Verma	0.56
175	Ap Power Energy	0.56
176	D.J Pegu Construction	0.56
177	V.S Enterprises	0.56
178	Wafa Construction	0.54
179	Dev Contractor	0.54
180	Shristy Crop Care	0.54
181	Jakhar Construction Company	0.54
182	Azad Infrapower Private Limited	0.54
183	Mahi Infra Projects	0.53
184	Shah Alam Hardware	0.53
185	Gen X Enterprise	0.53
186	Absolute Power Solutions Llp	0.52
187	Jai Maa Traders	0.51
188	K.G.N.Enterprise	0.51
189	Vijay Civil Contractor	0.51
190	M.D Enterprise	0.50
191	P.A. Traders And Construction	0.49
192	A.S Enterprise	0.49
193	Lwithw Narzary	0.49
194	Quantsolar Technologies Private Limited	0.49
195	Bharat Engineering	0.48

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LUMINO INDUSTRIES LTD. KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
196	Shambhu Enterprises	0.48
197	Das Enterprise	0.47
198	Sudixita Enterprises	0.47
199	A K Enterprise	0.47
200	R S Construction	0.46
201	Ranjit Electric	0.45
202	Progressive India	0.45
203	Pravat Patra	0.44
204	V.M And Co. Constructions	0.44
205	Aaradhya Enterprises	0.43
206	Singh Electrical	0.42
207	Sunil Kumar Contractor And Suppliers	0.40
208	Jai Balaji Timber Products	0.40
209	Umesh Kumar	0.39
210	P.S. Enterprises	0.39
211	Rudra Construction	0.39
212	A.J Electrical Construction	0.38
213	Vaishnav Engineers	0.38
214	M/S Ajay Construction	0.38
215	Khilari Kumar	0.38
216	A.H.K. Enterprise	0.36
217	Aee Tech Solutions	0.36
218	Mukaleshar Momin	0.36
219	National Light Service	0.35
220	Biswakarma Electricals	0.35
221	Dishu Divya Enterprises	0.35
222	M S Power & Projects	0.34
223	Pradeep Ray	0.34
224	Krishna Enterprises	0.34
225	Devi Electricals	0.34
226	Manish Singh	0.33
227	Sri Ma Engineering	0.33
228	Shree Dhyananand Ji Construction	0.33
229	Aai Krupa Enterprise	0.33
230	Alalbia Enterprise	0.32
231	Roy Traders	0.32
232	Rpsg Industries Private Limited	0.32
233	Murli Baba Enterprises	0.32
234	Alpha Dies	0.32
235	Dhruve Construction	0.31

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LUMINO INDUSTRIES LTD. ★ KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
236	G Polyplast Industries Private Limited	0.31
237	Aryan Construction	0.30
238	Agam Enterprises	0.30
239	Brajesh Construction Company	0.30
240	P B Electricals	0.30
241	Kaba Express Private Limited	0.30
242	Puran Pandit	0.30
243	Unique Power & Infra Solutions	0.29
244	Maa Tapeswari Enterprises	0.29
245	Cartsecurity Solutions Private Limited	0.29
246	Jain Safeweld Private Limited	0.28
247	Anvi Construction	0.28
248	Industrial Switchgear & Cables Co. Pvt. Ltd	0.28
249	Dinesh Prasad Bhokta	0.27
250	Hazikul Islam	0.27
251	Gyatri Enterprises	0.27
252	Wrixty Services Pvt Ltd	0.27
253	Sarkar Electric	0.27
254	Bala Ji Constructions	0.26
255	Maa Pitambra Engineering	0.26
256	Nilu Kumari	0.25
257	Maa Pitambara Trading Company	0.24
258	Css Infratech Private Limited	0.24
259	M S Constructions	0.24
260	Ashok Kumar Mishra	0.23
261	Ghosh Construction	0.23
262	M.B. Enterprise	0.22
263	Shri Bala Ji Enterprises	0.22
264	Kavya Contractor Civil And Electricals	0.22
265	K C Mohta	0.22
266	Krish Electropower	0.21
267	Raghuwanshi Infrastructure Private Limited	0.21
268	Om Construction	0.21
269	Nanna Traders	0.21
270	S.R. Enterprise	0.21
271	Jimon Jyoti Electrical	0.21
272	Yaduvanshi Traders	0.20
273	Jay Mata Construction	0.20
274	S Kumar	0.20
275	Mahavir Xpert Technoplast Private Limited	0.20

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LUMINO INDUSTRIES LTD. KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
276	Energy Solutions	0.20
277	Madhukar Enterprises	0.20
278	Mithilesh Kumar Singh	0.20
279	R.S Enterprises	0.19
280	Jyanshu Construction And Suppliers	0.19
281	Rajesh Construction	0.19
282	Sri Balaji Contractors	0.19
283	Santosh Ghosh	0.19
284	Shiva Construction	0.19
285	Kushi Enterprises	0.19
286	Alamin Enterprise	0.19
287	Hoops & Strips Pvt Ltd	0.18
288	Kkm Engineering Solutions Pvt Ltd	0.18
289	Neel Kanth Enterprises	0.18
290	Starone Global Private Limited	0.18
291	Virupaksha India Build Private Limited	0.18
292	Dhanvi Engineers	0.18
293	Jayanti Enterprises	0.18
294	Mahakal Construction	0.18
295	Electrum India	0.18
296	Barman Agency	0.17
297	Deep Engineering	0.17
298	J.K.Enterprise	0.17
299	Ayukshit Solutions Private Limited	0.17
300	Exquisite Print And Pack Pvt. Ltd.	0.16
301	Mahir Uddin	0.16
302	S.A. Enterprise	0.15
303	Ambar Paints & Chemicals	0.15
304	Bela Construction	0.15
305	M/S S.K. Construction	0.15
306	M/S Roy Enterprises	0.15
307	Anukaran Singh Infrastructure	0.15
308	Nacof Farrukhabad	0.15
309	Sanjib Kumar Rabha	0.15
310	Pubana Enterprise	0.14
311	Nextone Constructions Private Limited	0.14
312	Dinabandhu De	0.13
313	Misano Ventures	0.13
314	Dk Construction	0.13
315	Roy Constructions	0.13

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SDP & ASSOCIATES Chartered Accountants KOLKATA

LUMINO INDUSTRIES LTD. KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
316	Gulab Paints	0.13
317	Barman Construction	0.13
318	Wilqo India Engineering	0.13
319	Krishna Contractor'S	0.12
320	Maa Kalika Electricals	0.12
321	Sanjay Kataruka	0.12
322	Pratap Construction	0.12
323	Penguin Paper Box	0.12
324	Shree Om Enterprises	0.12
325	Mandal Electrical	0.12
326	Debjit Kumar Bose	0.12
327	G.R Electricals	0.12
328	Power Group	0.11
329	Shivay Traders	0.11
330	Harash Enterprises	0.11
331	Nihal Construction	0.11
332	Up Global Services Of Company	0.10
333	U.B Trade And Agency	0.10
334	Aryan Engineering Works	0.10
335	Raj Carrier Private Limited	0.10
336	Topline Industries Private Limited	0.10
337	Shanti Enterprises	0.10
338	Maa Tara Electricals	0.10
339	Ranjan Kumar	0.10
340	Gujarat Enterprise	0.09
341	Sarkar Enterprise	0.09
342	Dev Enterprises	0.09
343	Envotain Industries Private Limited	0.09
344	Shailendra Singh Choudhary	0.08
345	Maa Durga Electrical	0.08
346	Jay Shri Siddh Baba Supplier	0.08
347	Dharani Rabha	0.08
348	Lalita Electric Works	0.08
349	Earth Water Solutions	0.08
350	M J Contractor & Supplier	0.08
351	Sundarban Chemicals Private Limited	0.08
352	Rudrayansh Developer	0.08
353	Hemant Kumar Singh	0.07
354	Ripicibi Associates	0.07
355	Romjan Ali	0.07

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LUMINO INDUSTRIES LTD. KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
356	Sadhna Electrical	0.07
357	Nur Electric	0.07
358	M/S Prakash Yadav	0.07
359	M/S Panwar Tubewell Store	0.07
360	Noida Enterprises	0.07
361	Jay Maa Sharada Enterprises	0.07
362	New Furniture Center	0.07
363	Simms Infrastructure	0.07
364	Shri Krishna Infrastructure & Power Solution	0.07
365	Baid Power Services Pvt.Ltd.	0.06
366	Thakuria Fashions	0.06
367	Arnab Singha Roy	0.06
368	Techno Power	0.06
369	A K Tiwari	0.06
370	Rakhi Enterprise	0.06
371	Debasish Ghosh	0.06
372	Balaji Electricals	0.06
373	Eshta Traders	0.06
374	Manjeet Kumar	0.06
375	Specialities	0.06
376	Sahajahan Ahamed	0.06
377	Samia Enterprise	0.06
378	Sum Engineers	0.06
379	Tstructures Associates	0.06
380	Hind Electric & Trading Co.	0.05
381	Imran Enterprises	0.05
382	Chiranjivi Enterprise	0.05
383	S.R.Enterprise	0.05
384	Jaher Construction	0.05
385	Empower Solar Private Limited	0.05
386	B K K Enterprise	0.05
387	Saifee Engineering Industries	0.05
388	Shree Vinayak Security Force Private Limited	0.05
389	Omegalab Testing Services Private Limited	0.04
390	Impulse Technology	0.04
391	R.S.Construction	0.04
392	S.P. Power	0.04
393	Chaitanya Saraswat Enterprises	0.04
394	Sen Associates	0.04
395	Laha Enterprise	0.04

SINGHI & CO. Chartered Accountants

SDP & ASSOCIATES Chartered Accountants KOLKATA

LUMINO INDUSTRIES LTD. KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
396	Bamdev Security Services Private Limited	0.04
397	Maa Chandi Construction	0.04
398	Maity Enterprise	0.04
399	Roushan Kumar	0.03
400	Mr Contractor	0.03
401	Brahmaputra Electricals	0.03
402	Smriti Electrical And Contractors	0.03
403	Vayuna Systems Private Limited	0.03
404	Sofi Infrastructure Private Limited	0.03
405	Asterisk Electronics Pvt Ltd	0.03
406	Mallick Electrical	0.03
407	Switch On Electrical	0.03
408	Rocisa Private Limited	0.02
409	Amoli & Abhiraksha Enterprises	0.02
410	R.B Electricals	0.02
411	Atif Enterprise	0.02
412	Superspeed Carriers Private Limited	0.02
413	Bhattacharya Printers	0.02
414	Singh Trading Company	0.02
415	Naresh Kumar Gupta	0.02
416	New Sathi Enterprise	0.02
417	Trs Logistics	0.02
418	Transon Engineering Private Limited	0.02
419	Biswaranjan Dutta	0.02
420	R. V. Briggs & Co. Pvt. Ltd.	0.02
421	Prapti Construction	0.02
422	Bhola Enterprise	0.02
423	Raj Electricals	0.02
424	N.S. Enterprises	0.02
425	Sukanta Bhattacharya	0.02
426	Awadh Solutions	0.02
427	Gautam Kumar	0.01
428	Panchanan Dandapath	0.01
429	Aijaz Ahmad Malik (Baramulla)	0.01
430	Manik Prasad	0.01
431	I - Maxx Computers.	0.01
432	Ramesh Kumar Pandey	0.01
433	Sayan Enterprise	0.01
434	Abns Scientific Services	0.01
435	Parimal Sarkar	0.01

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SDP & ASSOCIATES Chartered Accountants KOLKATA

LUMINO INDUSTRIES LTD. KOLKATA

S. No.	Party Name	Amount Outstanding (Rs. in Million)
436	Pankaj Enterprises	0.01
437	Anoop Kumar Rahul Gupta	0.01
438	Shree Dhanlaxmi Enterprises	0.01
439	Pankaj Yadav	0.01
440	V K Enterprises	0.01
441	Genuine Enterprises	0.01
442	Ganapati Weld	0.01
443	Royal Engineering Co	0.01
444	S K Enterprise	0.01
445	Break Down Service	0.01
446	Sangita Enterprises	0.01
447	Sunsys Engineering and Construction	0.00#
448	Positronics India	0.00#
449	Mahalaxmi Electric Stores	0.00#
450	Aziz Ansary	0.00#
451	2Coms Consulting Private Limited	0.00#
452	Vaishno Wire Private Limited	0.00#
453	Nihir Extru-Mould Industries	0.00#
454	Sagar Ray	0.00#
	Total	**906.39**

 # Below rounding off norms of the company

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LUMINO INDUSTRIES LTD. ★ KOLKATA

Annexure C
Details of Material Creditors as per Restated Consolidated Financial Information as at 31st March 2026

S. No.	Party Name	Type of Creditor	Amount Outstanding (Rs. in Million)
1	Hindalco Industries Ltd	Other than MSME	620.05
2	A2Z Labour Services Private Limited	MSME	222.53
3	Bharat Aluminium Company Limited	Other than MSME	142.13
	Grand Total		**984.71**

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SDP & ASSOCIATES Chartered Accountants KOLKATA

LUMINO INDUSTRIES LTD. KOLKATA

ANNEXURE D

Materiality Policy approved by the Board, dated 04 August 2025
Identification of 'Material Creditors'

Requirement:

As per the requirements of the SEBI ICDR Regulations, the Company shall make relevant disclosures in the Offer Documents and on the website of the Company for outstanding dues to creditors as follows:

(i) Based on the policy on materiality defined by the Board, details of the creditors which include the consolidated number of creditors and the aggregate amount involved, will be disclosed in the Offer Documents;

(ii) Consolidated information on outstanding dues to micro, small and medium enterprises ("MSME") and other creditors, separately giving details of number of cases and amount involved will be disclosed in the Offer Documents; and

(iii) Complete details about outstanding overdues to material creditors along with the name and amount involved for each such material creditor shall be disclosed on the website of the Company with a web link thereto in the Offer Documents.

Policy on materiality:

For identification of material creditors, a creditor of the Company shall be considered to be material for the purpose of disclosure in the Offer Documents, if the amounts due to such creditor exceeds 5% of the restated consolidated total trade payables of the Company as of the end of the latest financial period covered in the Restated Consolidated Financial Information disclosed in the Offer Documents. For outstanding dues to MSME and other creditors, the disclosure will be based on information available with the Company regarding the status of the creditors as MSME as defined under Section 2 of the Micro, Small and Medium Enterprises Development Act, 2006, as amended.

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LUMINO INDUSTRIES LTD. KOLKATA