



Rajesh Garg and Co.,

Company Secretaries

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INDEPENDENT LEGAL OPINION

To,
The Board of Directors
Jindal Supreme (India) Limited
(CIN: U27109HR1974PLC007126)
9th KM, O P Jindal Marg, Hisar Cantt,
Hisar - 125006, Haryana

Subject: Independent Legal Opinion on Certificate of Incorporation (COI) regarding original name of incorporation and MCA correspondence

I, **Rajesh Garg**, Practising Company Secretary, CP No. 4093, have been requested by **Jindal Supreme (India) Limited** ("Company") to provide my opinion regarding the incorrect reference to the Company's original name in the Certificate of Incorporation ("COI").

1. Background

Based on the documents and records provided, the Company was originally incorporated on March 5, 1974 as "Janak Steel Tubes Private Limited".

The subsequent change in the name of the Company is below:

1. **March 5, 1974:** Janak Steel Tubes Private Limited
2. **November 22, 2001:** Janak Steel Tubes Limited
3. **June 8, 2016:** Janak Steel Tubes Private Limited
4. **August 10, 2017:** Jindal Supreme (India) Private Limited
5. **September 17, 2025:** Jindal Supreme (India) Limited

While filing **Form INC-27** for conversion into a public limited company, the field "Originally incorporated as" was inadvertently mentioned as "**Janak Steel Tubes Limited**" instead of "**Janak Steel Tubes Private Limited**".

Accordingly, the COI issued pursuant to the filing contains an incorrect historical reference.

2. MCA Rectification and Correspondence

The Company approached MCA for correction through SRN: FO_202511202879248 dated November 20, 2025. MCA subsequently closed the request on November 25, 2025 without issuing a revised COI.



The Company thereafter followed up with MCA on April 13, 2026. MCA Support Team subsequently via Email dated April 30, 2026 submitted that:

"The details provided are corrected; however, the Certificate of Incorporation (COI) cannot be generated in this case."

3. Assessment

Based on the original COI and other statutory records, it is my considered opinion that the Company was originally incorporated as "Janak Steel Tubes Private Limited" and not as "Janak Steel Tubes Limited".

The reference to "Janak Steel Tubes Limited" is an inadvertent clerical/documentary error arising from the incorrect entry in Form INC-27. The error does not create a separate legal entity, affect the Company's original date of incorporation or interrupt its corporate continuity.

The inability of MCA to generate a revised COI does not, by itself, indicate cancellation or cessation of the Company's incorporation or legal existence.

4. Conclusion & Opinion

Based on the documents made available to us, including the correspondence from Ministry of Corporate Affairs ("MCA") vide email dated April 30, 2026, together with the master data of the Company available on the MCA portal, it is noted that the corporate name and status of the Company are correctly reflected therein as Jindal Supreme (India) Limited, a public limited company.

Further, the latest Certificate of Incorporation ("COI") dated September 17, 2025, as well as the MCA master data, reflect the correct corporate name of the Company as Jindal Supreme (India) Limited. Accordingly, the corporate name and legal status of the Company are duly reflected in the records maintained by the MCA.

In this context, the communication stating that the corrected COI "cannot be generated", it is our considered opinion that such inability, in itself, would not impede the Company's ability to list its equity shares, open and operate bank accounts, execute and enforce material contracts, or otherwise undertake its ordinary business and corporate activities following the Initial Public Offering ("IPO"). The Company's identity, corporate name and status as a public limited company are duly evidenced by the latest COI and the MCA master data and the inability to generate a further corrected COI should not, by itself, affect the validity or continuity of the Company's corporate existence or its ability to conduct its business and corporate affairs post-IPO.

For Rajesh Garg & Co.,
Practising Company Secretary



Rajesh Garg
FCS No.: 5960
CP No.: 4093

Peer Review Certificate No.: 6749/2025



Place: Hisar
Date: 25-08-2026