

LEGAL OPINION

20th July 2026

Advance Technoforge Limited
Sr. No.-121, Plot No. 1 to 6, At. & Po. Padavala Road,
Opp. Waterflow Piping System, Veraval Shapar,
Rajkot – 360004, Gujarat, India

Attn: Nilesh Shambhubhai Moliya, Managing Director

Sub: Legal Opinion on Non-Applicability of Fire Prevention and Life Safety No Objection Certificate (“Fire NOC”) to Unit-I and Unit-II of Advance Technoforge Limited, in response to the query raised by BSE Limited.

We refer to the query raised by BSE Limited (communicated by Ms. Parika Shah, Deputy Manager – Listing Compliance IPO, BSE Limited) in connection with the Updated Draft Prospectus (“Prospectus”) filed by Advance Technoforge Limited (“**the Company**”) for its proposed Initial Public Offering.

The requirement of obtaining a Fire Prevention and Life Safety No Objection Certificate (“**Fire NoC**”) in the State of Gujarat is governed by the *Gujarat Fire Prevention and Life Safety Measures Act, 2013 and the Gujarat Fire Prevention and Life Safety Measures Rules, 2014* (“*the Rules*”). The Third Schedule to the Rules, read with Rule 14(1), prescribes the categories of buildings which are required to obtain a fire safety certificate.

*The Third Schedule was substituted by the Government of Gujarat, Urban Development and Urban Housing Department, vide Notification No. GH/V/68 of 2021/AGN-102021-100-L1 dated 8th July 2021 (attached herewith to this document as **Annexure-I**), being the Gujarat Fire Prevention and Life Safety Measures (Second Amendment) Rules, 2021 (“the Notification”). As per the substituted Third Schedule, a Fire NoC certificate is mandatorily required only for:*

(a) *all high-rise buildings having a height of 15 metres and above; and*

(b) *special buildings, being –*

hotel, educational, institutional, business, mercantile, storage, hazardous and mixed occupancy buildings, where the floor area exceeds 500 sq.m. on any one or more floors;

educational buildings having a height of 9 metres and above;

institutional buildings having a height of 9 metres and above;

all assembly buildings;

all multilevel car parking;

*all hazardous buildings not covered under the **Factories Act, 1948**;*

*buildings having an incidental assembly occupancy area of more than 300 sq.m. on any floor;
and*

buildings with two or more basements, or a single basement of area more than 500 sq.m.

In light of the above, along with the Certificate dated 14 July 2026 (attached herewith to this Document as **Annexure-II**) issued by Er. Niraj Makwana, Registered Architect (RMC Registration No. EOR-1/432. To the best of our knowledge, we are of the opinion that Unit-I and Unit-II of Advance Technoforge Limited do not fall within any category of buildings specified in the *Third Schedule to the Gujarat Fire Prevention and Life Safety Measures Rules, 2014 (as amended)*, which require a fire safety certificate. Accordingly, a Fire NOC is not applicable to Unit-I and Unit-II of the Company under the prevailing statutory provisions of the State of Gujarat. The relevant particulars of the two Units are set out below.

Parameter	Unit-I	Unit-II
Total height of building	9.14 metres	8.50 metres
Total built-up area	1,736.52 sq.m.	1,543.65 sq.m.
Basement	Nil	Nil
As-built dimensions vs. approved plan	Complies	Complies

On a conjoint reading of the Third Schedule (as substituted by the Notification), the Certificate issued by Registered Architect and, with the facts to the best of our knowledge, we note the following:

- I. Neither Unit-I (9.14 metres) nor Unit-II (8.50 metres) attains a height of 15 metres or more, and neither building therefore falls within the description of a “high-rise building” under clause (a) of the Third Schedule.

- II. Both Units are industrial/manufacturing buildings used by the Company for its forging operations, and are not hotel, educational, institutional, business, mercantile, storage, hazardous or mixed-occupancy buildings of the description contemplated under clause (b)(1) of the Third Schedule; are not educational or institutional buildings of 9 metres and above; are not assembly buildings; and are not multilevel car parking facilities.
- III. In the absence of any of the triggering criteria specified in clauses (a) and (b) of the Third Schedule being satisfied in respect of Unit-I and Unit-II, the obligation to obtain a Fire NoC under Rule 14(1) of the Rules does not arise.

This opinion is issued for the specific and limited purpose of inclusion in the Offer Document(s) of the Company pursuant to its proposed Initial Public Offering and/or submission to the Regulatory Authority(ies), including BSE Limited, and not for any other purpose. This opinion is rendered on the basis of the documents and representations made available to us and reflects the factual and legal position as on the date hereof; we assume no obligation to update this opinion for any subsequent change in law or facts.

References herein to “we”, “our” and “us” are to RMA Legal Advocates & Solicitors.

Signed By:

Partner,
RMA Legal Advocates & Solicitors



Annexure - I

Notification
Urban Development and Urban Housing Department
Sachivalaya, Gandhinagar,
Dated the 8th July, 2021.

Gujarat Fire
Prevention
and Life
Safety
Measures
Act, 2013

No. GH/V/68 OF 2021/AGN-102021-100-L1.- WHEREAS the circumstances exist which renders it necessary to amend the Gujarat Fire Prevention and Life Safety Measures Rules, 2014;

AND WHEREAS Government of Gujarat is satisfied that the circumstances exist which renders it necessary to take immediate action to make rules and brought into force at once to dispense with the previous publication under the sub-section (1) of section 57 of the Gujarat Fire Prevention and Life Safety Measures Act, 2013(Guj.11 of 2013);

NOW THEREFORE, in exercise of the powers conferred by section 57 of the Gujarat Fire Prevention and Life Safety Measures Act, 2013(Guj. 11 of 2013), the Government of Gujarat hereby makes the following rules further to amend the Gujarat Fire Prevention and Life Safety Measures Rules, 2014, namely:-

1. (1) These rules may be called the Gujarat Fire Prevention and Life Safety Measures (Second Amendment) Rules, 2021.
(2) They shall come into force on the date of their publication in the *Official Gazette*.
2. In the Gujarat Fire Prevention and Life Safety Measures Rules, 2014 (hereinafter referred to as "the said Rules"), for THIRD SCHEDULE, the following SCHEDULE shall be substituted, namely:-

"THIRD SCHEDULE

(see rule 14(1))

List of buildings requiring fire safety certificate

The Following buildings shall require fire safety certificate for compliance of the fire prevention, life safety and fire protection measures:-

- (a) All high rise buildings having height 15 m and above; and
- (b) special buildings, those are,
 - (1) hotel, educational, institutional, business, mercantile, storage, hazardous and mixed occupancies buildings, where any of these buildings have floor area more than 500 m² on any one or more floors;
 - (2) educational buildings having height of 9 mtr and above;

- (3) institutional buildings having height of 9 mtr and above;
- (4) all assembly buildings;
- (5) all multilevel car parking;
- (6) all hazardous buildings not covered under The Factories Act, 1948
- (7) buildings, having area more than 300m² of incidental assembly occupancy on any floor;
- (8) buildings with two basements or more, or with one basement of area more than 500 m².

NOTE:

- 1) The definitions and terminology of the terms mentioned in this Schedule shall be as per the NBC - 2016 (Part 4).
- 2) Institutional buildings include hospitals, nursing homes, sanatoria, custodial, penal and mental institutions with beds (with or without ICU).
- 3) Owner or occupiers of the building or premises not covered under this schedule are advised to provide fire fighting installations as mentioned in Table 7 of the NBC - 2016 (Part 4) in good faith and practice and maintain the same in operational conditions all time."
- 4)

3. In the said rules, in the FOURTH SCHEDULE,-

- (i) In the entry at Sr. No.1, the item no. 9 and item no.10 shall be deleted;
- (ii) In the entry at Sr. No.2, item no. 10 shall be deleted;
- (iii) In the entry at Sr. No.3,-
 - (a) Item no. 9 shall be deleted
 - (b) In the item no. 11, for the words, "Hazardous Buildings" the words, brackets and figures "Hazardous Buildings (not covered under the Factories Act, 1948)" shall be substituted.

By order and in the name of Governor of Gujarat,


(R. H. Vasava)

Joint Secretary to Government.

To,

- The Secretary to Hon. Governor of Gujarat, Gandhinagar. (BY Letter)
- The ACS to Hon. CM, Swarnim Sankul-1, Gandhinagar.
- The PS to Hon. Dy. CM, Swarnim Sankul-1, Gandhinagar.
- The PS to All Hon. Ministers/MoS.
- The JS to CS, Sachivalaya, Gandhinagr.
- The Secretary, Legislative Assembly, Gandhinagar.
- The PS to ACS/PS/Secy ALL Secretariat Departments, Sachivalaya, Gandhinagar.
- All Municipal Commissioner, Municipal Corporation,
- The Commissioner, Municipalities Administration, Gujarat State, Gandhinagar (With a request to circulate to all R.C.Ms and Chief Officer, Municipalities)

- All Collectors,
- All DDOs,
- All CEOs, Urban/Area Development Authority
- The Director of Fire Prevention Services, Old Sachivalay, Gandhinagar
(With a request to circulate to all R.F.Os/C.F.Os)
- Chief Executive Officer, GMFB, Gandhinagr
- CEO, GSDMA, Udyog Bhavan, Gandhinagar
- Director of Relief, Sachivalaya, Gandhingar.
- The Manager, Government Central Pres, Gandhinagar.. with a request to publish the aforesaid Notification in the Extraordinary Government Gazette, Part-I, Central Section, and request you to kindly send 100 copies thereof to this department.
- The Assistant Draftman, Legislative and Parliamentary Affairs Department, Sachivalaya, Gandhingar.... with a request to translate and send Gujarati Version of the aforesaid Notification for publication and forward its 50 copies to this department and 100 copies to Director of Fire prevention Services.
- System Managar, UDD with request to upload the same on the website of UDD
- ~~Select File~~

Annexure - II

CERTIFICATE

Date: 14.07.2026

TO
THE BOARD OF DIRECTORS
ADVANCE TECHNOFORGE LIMITED
 Sr. No.-121, Plot No.1 to 6, At. & Po. Padavala Road,
 Opp. Waterflow Piping System, Veraval Shapar,
 Rajkot-360004, Gujarat, India.

TO
SUN CAPITAL ADVISORY SERVICES PVT. LTD.
 302, 3rd Floor, Kumar Plaza,
 Near Kalina Market, Kalina Kurla Road,
 Santacruz East, Mumbai-400029, Maharashtra, India

Dear Sir/Madam,

SUBJECT: CERTIFICATION OF BUILDING DIMENSIONS AND COMPLIANCE WITH FIRE SAFETY REGULATIONS FOR ISSUANCE OF FIRE NOC

Reference:

1.	Building/Project Name	:	ADVANCE TECHNOFORGE LIMITED (Formerly Known as ADVANCE TECHNOFORGE PRIVATE LIMITED)	
2.	Building/Unit Address	:	UNIT-1 Survey No. 121, Plot Nos.1 to 6, At. & Po. Padavala Road, Opp. Eaterflow Piping System, Veraval Shapar Lodhika, Rajkot, Gujarat-360024, India	UNIT-2 Survey No. 131/2, Plot 20 & 21, At. & Po. Padavala Road, Opp. Eaterflow Piping System, Veraval Shapar Lodhika, Rajkot, Gujarat-360024, India
3.	Owner/Developer	:	AdvanceTechnoforge Limited	DaxabenNileshbhaiMoliya PradipbhaiBhikhabhaiVora
4.	Building Use Permit No./Development Permission No.	:	Plot No.1 to 6, Reg No.234, Dated:26.05.2017	Plot No.20 & 21 Reg No.114&139, Dated:12.03.2024& 16.04.2024
5.	Applicable Regulations	:	The Gujarat Fire Prevention and Life Safety Measures Act, 2013 and the Gujarat Fire Prevention and Life Safety Measures Rules, 2014, as amended from time to time, and relevant National Building Code provisions.	

I, ER. NIRAJ MAKWANA, being a registered Architect with the Council of RMC Registration No. EOR-1/432 and having my office at 306, Sambhav Complex, Nana Mava Road, Rajkot-360005, do hereby certify as under:

- 1) That I have personally supervised the construction and have verified the 'as-built' drawings and measurements of the said building.
- 2) That based on my inspection and verification, I certify that the following critical dimensions and parameters of the building, which are relevant for fire prevention and life safety, are in conformity with the approved plans and comply with the provisions of the Gujarat Fire Prevention and Life Safety Measures Act, 2013, and its corresponding Rules.
- 3) TABLE OF CERTIFIED DIMENSIONS:

Niraj
Makwana Niraj A.
 306-Sambhav Complex,
 Nana Mava Road, Rajkot.
 R.M.C. LIC No. EOR-1/432

UNIT-1

Sr. No.	Parameter		As per Approved Plan	As Built / Measured on Site	Remarks (Complies/Does Not Comply)
1.	Total Height of the Building	:	9.14 M.T.	9.14 M.T.	complies
2.	Total Built-up Area	:	1736.52 SQ.MT.	1736.52 SQ.MT.	complies
3.	Width of Main Staircase(s)	:	-	-	complies
4.	Width of Fire Escape Staircase(s)	:	-	-	complies
5.	Width of Corridors/Passageway	:	-	-	complies
6.	Headroom Clearance (in staircases, corridors, and escape routes)	:	-	-	complies
7.	Marginal Open Space/Setback (for fire tender movement)	:			
	Front Side	:	7.62 MT	7.62 MT	Complies
	Rear Side	:	5.11 MT	5.11 MT	Complies
	Side 1	:	1.24 MT	1.24 MT	Complies
	Side 2	:	1.24 MT	1.24 MT	Complies
8.	Dimensions of Refuge Area(s)	:			Complies
9.	Ventilation Shaft Dimensions (For staircases, lift wells, etc.)	:	-	-	Complies
10.	Basement Details (Number of levels and clear height)	:	-	-	Complies

Niraj
Makwana Niraj A.
306-Sambhav Complex,
Nana Mava Road, Rajkot.
R.M.C. LIC No. EOR-1/432

4) TABLE OF CERTIFIED DIMENSIONS:

UNIT-2

Sr. No.	Parameter		As per Approved Plan	As Built / Measured on Site	Remarks (Complies/Does Not Comply)
1.	Total Height of the Building	:	8.50 MT.	8.50 MT.	complies
2.	Total Built-up Area	:	1543.65 MT.	1543.65 MT.	complies
3.	Width of Main Staircase(s)	:	-	-	complies
4.	Width of Fire Escape Staircase	:	-	-	complies
5.	Width of Corridors/Passageway	:	-	-	complies
6.	Headroom Clearance (in staircases, corridors, and escape routes)	:	-	-	complies
7.	Marginal Open Space/Setback (for fire tender movement)	:			complies
	Front Side	:	-	-	complies
	Rear Side	:	19.94 MT.	19.94 MT.	complies
	Side 1	:	-	-	complies
	Side 2	:	-	-	complies
8.	Dimensions of Refuge Area(s)	:	-	-	complies
9.	Ventilation Shaft Dimensions (For staircases, lift wells, etc.)	:	-	-	Complies
10.	Basement Details (Number of levels and clear height)	:	-	-	Complies

- 5) I further certify that the building has been constructed in accordance with the sanctioned plans and that there are no unauthorized constructions or deviations affecting the fire and life safety requirements, such as obstruction of escape routes, marginal open spaces, or refuge areas.
- 6) The information provided herein is true and correct to the best of my knowledge, professional judgment, and belief. I am aware that I shall be solely responsible for any inaccuracies or misrepresentations in this certificate.


Makwana Niraj A.
306-Sambhav Complex,
Nana Mava Road, Rajkot.
R.M.C. LIC No. EOR-1/432

Based on the building dimensions and compliance with the applicable fire safety regulations, it is certified that the requirement for obtaining a Fire Prevention and Life Safety No Objection Certificates not applicable to the said building under the prevailing statutory provisions.

This Certificate is for the specific purpose of inclusion in the Offer Document(s) of the Company pursuant to their proposed Initial Public Offering (IPO) and/or if required, submitting to the same to the Regulatory Authority(ies) and not for any other purpose. I further hereby give my consent to the inclusions and disclosure of our name and other relevant details in the Offer Document(s).


Makwana Niraj A.
306-Sambhav Complex,
Nana Mava Road, Rajkot.
R.M.C. LIC No. EOR-1/432

(signature of the Architect)

ER. NIRAJ MAKWANA, Registered Engineer, RMC Registration No.: EOR-1/432

Contact No.: 98984 45945 Email: 21ddeesignspace.arch@gmail.com