



RACL Geartech Ltd.

Corporate Office

B-9, Sector-3, Noida, Uttar Pradesh-201301, INDIA

Phone: +91-120-4588500 Fax: +91-120-4588513

Web: www.raclgeartech.com E-mail: info@raclegeartech.com

Date: 01st July, 2024

**The Manager - Listing
BSE Limited
25th Floor, P. J. Towers,
Dalal Street,
Mumbai-400 001**

Scrip Code: 520073

Subject: Intimation of Application for Reclassification under Regulation 31A of of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/Madam,

The Company is in receipt of requests from Dev Raj Arya, Promoter and Raj Arya, Promoter group of the Company, seeking reclassification as public under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Sr. No.	Promoter/Promoter Group	Category	No. of Shares	Percentage
01	Dev Raj Arya	Promoter	222554	2.06%
02	Raj Arya	Promoter Group	0	0%

In this regard, please find attached herewith the requests received from the above-mentioned Promoter and Promoter Group of the Company.

In addition to BSE Limited, Company is not listed on any other stock exchange.

We hereby request you to kindly process our application for reclassification of promoter and promoter group as public under Regulation 31A of Listing Regulations, 2015 and grant your approval.

Kindly take the above information on record and oblige.

Thanking You,

Yours sincerely,
For RACL Geartech Limited

**Jitender Jain
Chief Financial Officer**

Registered Office

15th Floor, Eros Corporate Tower, Nehru Place, New Delhi-110019, INDIA

Phone: +91-11-66155129

CIN: L34300DL1983PLC016136

D-U-N-S Number: 65-013-7086



TS 16949 : 2009
TS 518901 : 000



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List of persons related to the promoter(s) seeking reclassification specifying the relation with the person seeking reclassification as per Reg 2(1)(pp) of SEBI (ICDR), 2018.

Dear Sir/Madam,

The following list of persons are related to Promoter and Promoter Group seeking reclassification to Public Category as per Reg 2(1) (pp) of SEBI(ICDR), 2018.

Sr. No.	Name of Shareholder	Name of Relative	Relation	Shareholding of relative in RACL Geartech Limited
1.	Dev Raj Arya	Raj Arya	Spouse	0
2.	Raj Arya	Dev Raj Arya	Spouse	222554

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TS 16949 : 2009
TS 518901 - 000



Undertaking by the Company

Date: 01st July, 2024

**To,
The Deputy General Manager,
Listing Compliance Monitoring Cell,
24th Floor, P.J. Towers,
Dalal Street, Mumbai -400001**

Sub: Application for Reclassification under Regulation 31A (9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 [(Listing Regulations), 2015]

Dear Sir / Madam,

With relation to our application for reclassification of promoter shareholders, we hereby confirm and certify that:

1. Outgoing Promoter(s) and persons related to the promoter(s) do not together hold more than Ten percent of the total voting rights in the Company.
2. Post reclassification, the Outgoing promoter(s) will not exercise direct or indirect control over the affairs of the Company.
3. All special rights of the Outgoing Promoter(s) which were acquired by virtue of any shareholder agreements have been terminated.
4. Outgoing Promoter(s) will not be represented on the Board of Directors (including a Nominee Director) of the Company for a period of not less than three years from the date of such reclassification.
5. Outgoing Promoter(s) will not act as a key managerial person in the Company for a period of not less than three years from the date of such reclassification.
6. The company, its promoters, its directors are not in violation of the restrictions imposed by SEBI under SEBI circular no. SEBI/HO/ MRD/DSA/CIR/P/2017/92 dated August 01, 2017.
7. That the company or its promoters or whole-time directors are not in violation of the provisions of Regulation 34 of the SEBI (Delisting of Equity Shares) Regulations, 2021.
8. Outgoing Promoter(s) are not a wilful defaulter as per the Reserve Bank of India Guidelines.
9. Outgoing Promoter(s) are not a fugitive economic offender.



10. That the company is compliant with the requirement for minimum public shareholding as required under Regulation 38 of SEBI (Listing Obligation and Disclosure Requirement) and the proposed reclassification is not being initiated for achieving the Minimum Public Shareholding.
11. That trading in the shares of the company has not been suspended by the stock Exchanges
12. That the Company does not have any outstanding dues to the SEBI, the Stock Exchanges or Depositories.
13. In case the promoter(s) seeking re-classification fails to comply with the provision of sub-clause (i), (ii), (iii), (iv) and (v) of clause (b) of Regulation 31A (3), they shall be reclassified as promoter/persons belonging to promoter group, as stated in regulation 31A (4). The same will be intimated to the Exchange as soon as possible.
14. Promoter(s) seeking reclassification and persons related to reclassification have not voted to approve on the resolution for reclassification.
15. There is no pending regulatory action against promoter(s) seeking re-classification.

Yours Faithfully,
For RACL Geartech Limited

Jitender Jain
Chief Financial Officer

DEV RAJ ARYA

3164-A, MAHENDRA PARK

RANI BAGH

NEW DELHI-110034

Mobile:09990675555

To,

The Board of Directors

RACL Geartech Limited

B- 9, Sector- 3, Pinnacle Business Park,

Noida- 201301, Uttar Pradesh

01-07-2024

Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015

Dear Sir / Madam,

Please be informed that undersigned has been superannuated from the Company and has relinquished the office of Whole Time Director & CFO with effect from October 21, 2023.

With reference to the above subject, I would like to say that at present I am holding 222554 equity shares of ₹ 10/-each aggregating to 2.06 % of the total paid up equity share capital of RACL Geartech Limited ("the Company") and have been classified by the Company under Promoter Category in the Shareholding Pattern filled by the Company with the Stock Exchange and other regulatory authorities.

In respect to the aforesaid matter, I wish to inform you that I am no way related to any act of the business carried out by the Company. Further I am not engaged in the management or day to day affairs of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of our shareholding. None of our act would impact the decision taken by the Company.

Further in accordance with the provisions of Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, I hereby undertake as follows:

1. I along with persons related to me together:
 - a. do not hold more than ten percent of the total voting rights in the company.
 - b. do not exercise control over the affairs of the company, through formal or informal arrangements including through any shareholder agreements.
 - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
 - d. are not being represented on the board of directors (including not having a nominee director) of the Company.
 - e. do not act as a key managerial person of the Company.
 - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
 - g. are not fugitive economic offender.
2. There is no pending regulatory action against me.

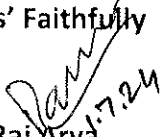
DEV RAJ ARYA
3164-A, MAHENDRA PARK
RANI BAGH
NEW DELHI-110034
Mobile:09990675555

3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.

4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

In light of foregoing, I request the Board of Directors of the Company to consider and approve the request of reclassification from 'PROMOTER' category to 'PUBLIC' category shareholders, place the same before the members of the Company and make requisite application to the Stock Exchange in accordance with **Regulation 31A of the SEBI LODR Regulations.**

Yours' Faithfully


Dev Raj Arya
Email Id: aryadr52@gmail.com
Contact No.: 9990675555

✓ Cc: Ms. Neha Bahal
✓ Company Secretary & Compliance Officer
RACL Geartech Limited

DEV RAJ ARYA
3164-A, MAHENDRA PARK
RANI BAGH
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Mobile:09990675555

To,
The Board of Directors
RACL Geartech Limited
B- 9, Sector- 3, Pinnacle Business Park,
Noida- 201301, Uttar Pradesh

01-07-2024

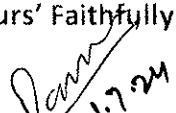
Sub: Undertaking for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015

Dear Sir / Madam,

In accordance with the provisions of Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, I hereby undertake as follows:

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 - a. do not hold more than ten percent of the total voting rights in the company.
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 - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
 - d. are not being represented on the board of directors (including not having a nominee director) of the Company.
 - e. do not act as a key managerial person of the Company.
 - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
 - g. are not fugitive economic offender.
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
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Yours' Faithfully


Dev Raj Arya
Email Id: aryadr52@gmail.com
Contact No.: 9990675555

✓ Cc: Ms. Neha Bahal
Company Secretary & Compliance Officer
RACL Geartech Limited

RAJ ARYA
3164-A, MAHENDRA PARK
RANI BAGH
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01-07-2024

To,
The Board of Directors
RACL Geartech Limited
B- 9, Sector- 3, Pinnacle Business Park,
Noida- 201301, Uttar Pradesh

Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015

Dear Sir / Madam,

With reference to the above subject, I would like to say that at present I am holding no equity shares aggregating to 0 % of the total paid up equity share capital of RACL Geartech Limited ("the Company") and have been classified by the Company under Promoter Category in the Shareholding Pattern filled by the Company with the Stock Exchange and other regulatory authorities.

In respect to the aforesaid matter, I wish to inform you that I am no way related to any act of the business carried out by the Company. Further I am not engaged in the management or day to day affairs of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of our shareholding. None of our act would impact the decision taken by the Company.

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 - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
 - g. are not fugitive economic offender.
2. There is no pending regulatory action against me.

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01-07-2024

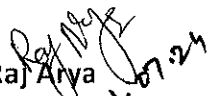
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