ASHOKA REFINERIES LIMITED

Reg. Off: 408, Wallfort Ozone, Fafadih, Raipur (Chhattisgarh) 492001, PH-07714036578 CIN NO: L15143CT1991PLC006678

REF: ARL/BSE/2024-25/24

30 August, 2024

BSE Ltd Corporate Relationship Department P. J. Towers, 25thFloor,Dalal Street, Mumbai (Maharashtra) 400 001

Dear Sir/Madam,

<u>Subject: Intimation pursuant to Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereof.</u>

Further to our intimation dated 29th August 2024 regarding the receipt of request(s) for reclassification from the 'promoter and promoter group' category to 'public' category shareholders, we wish to inform you that their request was placed before the Board of Directors of the Company at their meeting held on 29th August 2024. The Board inter-alia has considered the request made by the following members of Promoter and Promoter Group of the Company ("Outgoing Promoters") and after analyzing, has approved their request as required under Regulation 31A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

S.No.	Name of shareholder	Category	No. of Equity Shares	Percentage of holding
1.	Ajay Choudhary	Promoter group	33000	0.9700
2.	Alok Awadhiya	Promoter Group	31400	0.9230
3.	Alok Choudhari	Promoter Group	29300	0.8613
4.	Avdhesh Kumar Jain	Promoter Group	32900	0.9671
5.	Nilesh N Budhbhatti	Promoter Group	30000	0.8819
6.	Ravi Vaswani	Promoter Group	30000	0.8819
7.	Umesh Kumar Sahu	Promoter Group	32800	0.9642
8.	Yewan Kumar Sahu	Promoter Group	10000	0.294
9.	Sudhir Dixit	Promoter	21700	0.6379
	Cumulative holding		2,51,100	7.381

The above re-classification will be subject to permission of the shareholders and Stock Exchange in terms of Regulation 31A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 i.e., BSE Limited.

Further, in compliance with Regulation 31A (8)(b) of the Listing Regulations, we enclose herewith the certified extract of the minutes of the Board meeting held on 29^{th} August, 2024 in this connection.

We kindly request you to take the above submission on record.

Thanking you, Yours faithfully,

For, Ashoka Refineries Limited

(Garima Mogha)

Company Secretary & Compliance Officer M. No.: A66541

Encl1.Request Letters & Extract of Minutes of Board Meeting

ASHOKA REFINERIES LIMITED

Reg. Off: 408, Wallfort Ozone, Fafadih, Raipur (Chhattisgarh) 492001, PH-07714036578 CIN NO: L15143CT1991PLC006678

ANNEXURE

CERTIFIED TRUE COPY OF THE EXTRACT OF THE MINUTES OF MEETING OF BOARD OF DIRECTORS OF ASHOKA REFINERIES LIMITED HELD ON THURSDAY, THE 29TH DAY OF AUGUST, 2024 AT 5:30 P.M. AT THE REGISTERED OFFICE OF THE COMPANY AT 408, 4th FLOOR, WALLFORT OZONE, FAFADIH, RAIPUR C.G.

The Board noted that Mr. Ajay Choudhary, Mr. Alok Awadhiya, Mr. Alok Choudhari, Mr. Avdhesh Kumar Jain, Mr. Nilesh N Budhbhatti, Mr. Ravi Vaswani, Mr. Umesh Kumar Sahu, Mr. Yewan Kumar Sahu and Mr. Sudhir Dixit, members of the Promoter and Promoter Group of the Company ("Outgoing Promoters"), have vide their letter dated 28th August 2024 ("Request Letter") received by the Company on 28th August 2024 signified their intention to be re-classified to Public Shareholder category. In line with the requirements of Regulation 31A of the SEBI (LODR) 2015, the Company has notified the stock exchange about the receipt of the above request(s) on 29th August 2024. The Request Letter received from Outgoing Promoters was placed before the Board for its consideration. As on the date of the Request Letter, the details of the shareholding of the Outgoing Promoters are as follows:

S.No.	Name of shareholder	Category	No. of Equity Shares	Percentage of holding
1.	Ajay Choudhary	Promoter group	33000	0.9700
2.	Alok Awadhiya	Promoter Group	31400	0.9230
3.	Alok Choudhari	Promoter Group	29300	0.8613
4.	Avdhesh Kumar Jain	Promoter Group	32900	0.9671
5.	Nilesh N Budhbhatti	Promoter Group	30000	0.8819
6.	Ravi Vaswani	Promoter Group	30000	0.8819
7.	Umesh Kumar Sahu	Promoter Group	32800	0.9642
8.	Yewan Kumar Sahu	Promoter Group	10000	0.294
9.	Sudhir Dixit	Promoter	21700	0.6379
	Cumulative holding		2,51,100	7.381

The Board noted that the Outgoing Promoters have in their Request Letter confirmed that neither they nor the persons related to them:

- 1. hold more than 10% of the total voting rights in the Company.
- 2. exercise control over the affairs of the Company, directly or indirectly;
- 3. have any special rights with respect to the Company, through formal or informal arrangement, including through any shareholder agreements;
- 4. are represented on the board of directors of the Company (including by way of a nominee director);
- 5. are acting as key managerial personnel in the Company;
- 6. are classified as wilful defaulters as per the guidelines issued by the Reserve Bank of India; and
- 7. have been categorized as a fugitive economic offender.

The Board further noted the rationale for such re-classification is that in no way outgoing promoter/promoter group are associated to the business or management of the Company. Further they do not have any right either to appoint any director of the Company or any ability to control the management or policy decisions of the company in any manner whatsoever including by virtue of their shareholding and that none of their acts would influence the decision making in the Company.

The Board also noted that the Outgoing Promoters have undertaken in their Request Letter that they shall comply with the requirements specified in Regulation 31A(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations/ 2015 ("Listing Regulations") at all times.

The Board was further informed that in terms of Regulation 31A of the Listing Regulations/ the said re-classification shall require the approval of the Board, shareholders and the Stock Exchanges and or such other approval if any as may be necessary in this regard. Accordingly on the basis of the rationale provided above and in accordance with the provisions of Regulation 31A of the Listing Regulations, the Board considered the request of the Outgoing Promoters for reclassification from the 'Promoter and Promoter Group' category to 'Public shareholder' category, which shall be subject to permission of the Stock Exchanges.

The Board noted that none of the Directors of the Company are interested in this resolution.

The Board discussed the matter and after analysis and discussions, passed the following resolutions:

"RESOLVED THAT in accordance with the provisions of Regulation 31A of Securities and exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended ("Listing Regulations"), including any statutory modification(s) or re-enactment thereof, for the time being in force and other applicable provisions, if any, the letter dated 28th August, 2024 ("Request Letter") received fromAjay Choudhary, Alok Awadhiya, Alok Choudhari, Avdhesh Kumar Jain, Nilesh N Budhbhatti, Ravi Vaswani, Umesh Kumar Sahu, Yewan Kumar Sahu and Sudhir Dixit, forming part of 'promoter and promoter group' of the Company ("Outgoing Promoters"), for reclassification of their shareholding to 'public category', as circulated to the Board be and are hereby noted and taken on record.

RESOLVED FURTHER THAT the Board be and is hereby took note that as required under the provisions of Regulation 31(A)(3)(b) of the Listing Regulations, the Outgoing Promoters have confirmed that neither they nor the persons related to them:

- 1. hold more than 10% of the total voting rights in the Company.
- 2. exercise control over the affairs of the Company, directly or indirectly;
- 3. have any special rights with respect to the Company, through formal or informal arrangement, including through any shareholder agreements;
- 4. are represented on the board of directors of the Company (including by way of a nominee director);
- 5. are acting as key managerial personnel in the Company;
- 6. are classified as wilful defaulters as per the guidelines issued by the Reserve Bank of India; and
- 7. have been categorized as a fugitive economic offender.

and shall continue to comply with the conditions mentioned in Regulation 31A(4) of Listing Regulations post reclassification from 'promoter and promoter group' category to 'public' category.

RESOLVED FURTHER THAT pursuant to provisions of 31A(3)(c) of the Listing Regulations, the Board hereby confirms the following:

- 1. The Company is and post reclassification will be compliant with the requirement for minimum public shareholding as required under Regulation 38 of the Listing Regulations;
- 2. The Company shall not trade in its shares which have been suspended by stock exchanges; and
- 3. The Company does not have any outstanding dues to the Securities and Exchange Board of India, the stock exchanges or depositories.

RESOLVED FURTHER THAT pursuant to the provisions of the Regulation 31A of the Listing Regulations, and subject to the approval of the shareholders and stock exchange where the equity shares of the Company are listed namely, BSE Limited ("**Stock Exchange**"), and/or such other approvals, if any, as may be required in this regard, the approval of the Board be and is hereby accorded to approve the reclassification of shareholdings from 'promoter and promoter group' category to 'public' category for the following shareholders:

S.No.	Name of shareholder	Category	No. of Equity Shares	Percentage of holding
1.	Ajay Choudhary	Promoter group	33000	0.9700
2.	Alok Awadhiya	Promoter Group	31400	0.9230
3.	Alok Choudhari	Promoter Group	29300	0.8613
4.	Avdhesh Kumar Jain	Promoter Group	32900	0.9671
5.	Nilesh N Budhbhatti	Promoter Group	30000	0.8819
6.	Ravi Vaswani	Promoter Group	30000	0.8819
7.	Umesh Kumar Sahu	Promoter Group	32800	0.9642
8.	Yewan Kumar Sahu	Promoter Group	10000	0.294
9.	Sudhir Dixit	Promoter	21700	0.6379
	Cumulative holding		2,51,100	7.381

RESOLVED FURTHER THAT on approval of the re-classification by the Board of Directors, application be made by the Company to the Stock Exchange and/or to any other authority for their approval, as may be necessary to give effect to these resolutions.

RESOLVED FURTHER THAT for the purpose of giving effect to the foregoing resolution, any of the director(s) and Company Secretary & Compliance Officer, be and are hereby *severally* authorized on behalf of the Company to do all such acts, deeds, matters and things as they may at their discretion deem necessary or expedient for such purpose, including issuing certified true copy of any of the resolutions and/or extracts of the minutes of this board meeting to the concerned person/authority and making all necessary filings including but not limited to making applications to the Stock Exchanges to seek their approval for the re-classification in accordance with the Listing Regulations and other applicable laws, if any, and to execute all such deeds, documents or writings as are necessary or expedient for this purpose and settle any questions, difficulties or doubt that may arise in this behalf."

For, Ashoka Refineries Limited

(Garima Mogha)

Company Secretary & Compliance Officer

M. No.: A66541

Dear Sir/Madam,

Sub: Request Letter for seeking approval for Reclassification from Promoter Group category to Public Category in Ashoka Refineries Limited ("Company") as per Regulation 31A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

l, Ajay Choudhary, belonging to promoter group of the Company holding 33,000 shares representing 0.97% of total paid up equity capital, seeking reclassification from "Promoter Group Category" to "Public Category" in the Company under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015.

I hereby declare that I am in no way associated to the business or management of the Company. Further I do not have any right either to appoint any director of the Company or any ability to control the management or policy decisions of the company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company.

In this regards, I hereby confirm and certify that:

- 1. I along with person related to me together
 - i. do not hold more than ten percent of the total voting rights of the Company.
 - ii. do not exercise control over the affairs of the Company directly or indirectly.
 - iii. do not have any special rights in the Company through formal or Informal arrangements including throughany shareholders agreements.
 - iv. do not represent on the Board of Directors.
 - v. doesn't act as a key managerial person.
 - vi. are not a 'wilful defaulter' as per the Reserve Bank of India.
 - vii. Are not a fugitive economic offender.
- 2. There is no pending regulatory action against me.

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- 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 reclassification failing which, I shall be reclassified as 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 person belonging to the promoter group of the Company.

Kindly take the same on record and oblige.

Thanking you,

Yours faithfully,

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Ajay Choudhary
(Promoter Group)

Dear Sir/Madam,

Sub: Request Letter for seeking approval for Reclassification from Promoter Group category to Public Category in Ashoka Refineries Limited ("Company") as per Regulation 31A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

I, **Alok Choudhari**, belonging to promoter group of the Company holding 29,300 shares representing 0.8613% of total paid up equity capital, seeking reclassification from "Promoter Group Category" to "Public Category" in the Company under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015.

I hereby declare that I am in no way associated to the business or management of the Company. Further I do not have any right either to appoint any director of the Company or any ability to control the management or policy decisions of the company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company.

In this regards, I hereby confirm and certify that:

- 1. I along with person related to me together
 - i. do not hold more than ten percent of the total voting rights of the Company.
 - ii. do not exercise control over the affairs of the Company directly or indirectly.
 - iii. do not have any special rights in the Company through formal or Informal arrangements including throughany shareholders agreements.
 - iv. do not represent on the Board of Directors.
 - v. doesn't act as a key managerial person.
 - vi. are not a 'wilful defaulter' as per the Reserve Bank of India.
 - vii. Are not a fugitive economic offender.
- 2. There is no pending regulatory action against me.

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- 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 reclassification I failing which, I shall be reclassified as 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 person belonging to the promoter group of the Company.

Kindly take the same on record and oblige.

Thanking you,

Yours faithfully,

Alok Choudhari

(Promoter Group)

Dear Sir/Madam,

Sub: Request Letter for seeking approval for Reclassification from Promoter Group category to Public Category in Ashoka Refineries Limited ("Company") as per Regulation 31A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

I, **Alok Awadhiya**, belonging to promoter group of the Company holding 31400 shares representing 0.9230% of total paid up equity capital, seeking reclassification from "Promoter Group Category" to "Public Category" in the Company under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015.

I hereby declare that I am in no way associated to the business or management of the Company. Further I do not have any right either to appoint any director of the Company or any ability to control the management or policy decisions of the company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company.

In this regards, I hereby confirm and certify that:

- 1. I along with person related to me together
 - i. do not hold more than ten percent of the total voting rights of the Company.
 - ii. do not exercise control over the affairs of the Company directly or indirectly.
 - iii. do not have any special rights in the Company through formal or Informal arrangements including throughany shareholders agreements.
 - iv. do not represent on the Board of Directors.
 - v. doesn't act as a key managerial person.
 - vi. are not a 'wilful defaulter' as per the Reserve Bank of India.
 - vii. Are not a 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 reclassification I failing which, I shall be reclassified as 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 person belonging to the promoter group of the Company.

Kindly take the same on record and oblige.

Thanking you,

Yours faithfully,

Alok Awadhiya (Promoter Group)

Dear Sir/Madam,

Sub: Request Letter for seeking approval for Reclassification from Promoter Group category to Public Category in Ashoka Refineries Limited ("Company") as per Regulation 31A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations,2015

I, **Avdhesh Kumar Jain**, belonging to promoter group of the Company holding 32900 shares representing 0.9671% of total paid up equity capital, seeking reclassification from "Promoter Group Category" to "Public Category" in the Company under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015.

I hereby declare that I am in no way associated to the business or management of the Company. Further I do not have any right either to appoint any director of the Company or any ability to control the management or policy decisions of the company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company.

In this regards, I hereby confirm and certify that:

- 1. I along with person related to me together
 - i. do not hold more than ten percent of the total voting rights of the Company.
 - ii. do not exercise control over the affairs of the Company directly or indirectly.
 - iii. do not have any special rights in the Company through formal or Informal arrangements including throughany shareholders agreements.
 - iv. do not represent on the Board of Directors.
 - v. doesn't act as a key managerial person.
 - vi. are not a 'wilful defaulter' as per the Reserve Bank of India.
 - vii. Are not a fugitive economic offender.
- 2. There is no pending regulatory action against me.

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- 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 reclassification I failing which, I shall be reclassified as 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 person belonging to the promoter group of the Company.

Kindly take the same on record and oblige.

Thanking you,

Yours faithfully,

Avdhesh Kumar Jain

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(Promoter Group)

Dear Sir/Madam,

Sub: Request Letter for seeking approval for Reclassification from Promoter Group category to Public Category in Ashoka Refineries Limited ("Company") as per Regulation 31A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

I, **Nilesh N Budhbhatti**, belonging to promoter group of the Company holding 30,000 shares representing 0.8819% of total paid up equity capital, seeking reclassification from "Promoter Group Category" to "Public Category" in the Company under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015.

I hereby declare that I am in no way associated to the business or management of the Company. Further I do not have any right either to appoint any director of the Company or any ability to control the management or policy decisions of the company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company.

In this regards, I hereby confirm and certify that:

- 1. I along with person related to me together
 - i. do not hold more than ten percent of the total voting rights of the Company.
 - ii. do not exercise control over the affairs of the Company directly or indirectly.
 - iii. do not have any special rights in the Company through formal or Informal arrangements including throughany shareholders agreements.
 - iv. do not represent on the Board of Directors.
 - v. doesn't act as a key managerial person.
 - vi. are not a 'wilful defaulter' as per the Reserve Bank of India.
 - vii. Are not a 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 reclassification I failing which, I shall be reclassified as 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 person belonging to the promoter group of the Company.

Kindly take the same on record and oblige.

Thanking you,

Yours faithfully,

Nilesh N Budhbhatti

(Promoter Group)

Dear Sir/Madam,

Sub: Request Letter for seeking approval for Reclassification from Promoter Group category to Public Category in Ashoka Refineries Limited ("Company") as per Regulation 31A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

I, Ravi Vaswani, belonging to promoter group of the Company holding 30,000 shares representing 0.8819% of total paid up equity capital, seeking reclassification from "Promoter Group Category" to "Public Category" in the Company under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015.

I hereby declare that I am in no way associated to the business or management of the Company. Further I do not have any right either to appoint any director of the Company or any ability to control the management or policy decisions of the company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company.

In this regards, I hereby confirm and certify that:

- 1. I along with person related to me together
 - i. do not hold more than ten percent of the total voting rights of the Company.
 - ii. do not exercise control over the affairs of the Company directly or indirectly.
 - iii. do not have any special rights in the Company through formal or Informal arrangements including throughany shareholders agreements.
 - iv. do not represent on the Board of Directors.
 - v. doesn't act as a key managerial person.
 - vi. are not a 'wilful defaulter' as per the Reserve Bank of India.
 - vii. Are not a fugitive economic offender.
- 2. There is no pending regulatory action against me.

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- 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 reclassification *I* failing which, I shall be reclassified as 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 person belonging to the promoter group of the Company.

Kindly take the same on record and oblige.

Thanking you,

Yours faithfully,

Rayi Vaswani (Promoter Group)

Date: 28.08.2024

Dear Sir/Madam,

Sub: Request Letter for seeking approval for Reclassification from Promoter Group category to Public Category in Ashoka Refineries Limited ("Company") as per Regulation 31A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

I, **Umesh Kumar Sahu**, belonging to promoter group of the Company holding 32,800 shares representing 0.9642% of total paid up equity capital, seeking reclassification from "Promoter Group Category" to "Public Category" in the Company under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015.

I hereby declare that I am in no way associated to the business or management of the Company. Further I do not have any right either to appoint any director of the Company or any ability to control the management or policy decisions of the company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company.

In this regards, I hereby confirm and certify that:

- 1. I along with person related to me together
 - i. do not hold more than ten percent of the total voting rights of the Company.
 - ii. do not exercise control over the affairs of the Company directly or indirectly.
 - iii. do not have any special rights in the Company through formal or Informal arrangements including throughany shareholders agreements.
 - iv. do not represent on the Board of Directors.
 - v. doesn't act as a key managerial person.
 - vi. are not a 'wilful defaulter' as per the Reserve Bank of India.
 - vii. Are not a 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 reclassification I failing which, I shall be reclassified as 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 person belonging to the promoter group of the Company.

Kindly take the same on record and oblige.

Thanking you,

Yours faithfully,

Umesh Kumar Sahu (Promoter Group)

Dear Sir/Madam,

Sub: Request Letter for seeking approval for Reclassification from Promoter Group category to Public Category in Ashoka Refineries Limited ("Company") as per Regulation 31A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

I, **Yewan Kumar Sahu**, belonging to promoter group of the Company holding 10,000 shares representing 0.294% of total paid up equity capital, seeking reclassification from "Promoter Group Category" to "Public Category" in the Company under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015.

I hereby declare that I am in no way associated to the business or management of the Company. Further I do not have any right either to appoint any director of the Company or any ability to control the management or policy decisions of the company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company.

In this regards, I hereby confirm and certify that:

- 1. I along with person related to me together
 - i. do not hold more than ten percent of the total voting rights of the Company.
 - ii. do not exercise control over the affairs of the Company directly or indirectly.
 - iii. do not have any special rights in the Company through formal or Informal arrangements including throughany shareholders agreements.
 - iv. do not represent on the Board of Directors.
 - v. doesn't act as a key managerial person.
 - vi. are not a 'wilful defaulter' as per the Reserve Bank of India.
 - vii. Are not a fugitive economic offender.
- 2. There is no pending regulatory action against me.

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- 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 reclassification *I* failing which, I shall be reclassified as 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 person belonging to the promoter group of the Company.

Kindly take the same on record and oblige.

Thanking you,

Yours faithfully,

Yewan Kumar Sahu (Promoter Group)

Dear Sir/Madam,

Sub: Request Letter for seeking approval for Reclassification from Promoter Group category to Public Category in Ashoka Refineries Limited ("Company") as per Regulation 31A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

l, **Sudhir Dixit**, being promoter of the Company holding 21,700 shares representing 0.6379% of total paid up equity capital, seeking reclassification from "Promoter Group Category" to "Public Category" in the Company under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015.

I hereby declare that I am in no way associated to the business or management of the Company. Further I do not have any right either to appoint any director of the Company or any ability to control the management or policy decisions of the company in any manner whatsoever including by virtue of my shareholding and that none of my acts would influence the decision making in the Company.

In this regards, I hereby confirm and certify that:

- 1. I along with person related to me together
 - i. do not hold more than ten percent of the total voting rights of the Company.
 - ii. do not exercise control over the affairs of the Company directly or indirectly.
 - iii. do not have any special rights in the Company through formal or Informal arrangements including throughany shareholders agreements.
 - iv. do not represent on the Board of Directors.
 - v. doesn't act as a key managerial person.
 - vi. are not a 'wilful defaulter' as per the Reserve Bank of India.
 - vii. Are not a fugitive economic offender.
- 2. There is no pending regulatory action against me.

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- 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 reclassification I failing which, I shall be reclassified as 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 person belonging to the promoter group of the Company.

Kindly take the same on record and oblige.

Thanking you,

Yours faithfully,

Sudhir Dixit (Promoter)