

To,  
**BSE Limited**  
Corporate Relationship Department  
1st Floor, New Trading, Rotunda Building,  
PJ Towers, Dalal Street, Fort, Mumbai – 400001

**Scrip Code – 542376**

**Sub: Disclosure of inter-se transfer of shares between the Promoters/ Promoter Group with Regulation 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

Dear Sir/Madam,

Pursuant to the Regulations 30 read with Schedule III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Regulation 3 of SEBI (Prohibition of Insider Regulations), Regulations, 2015, we would like to inform you that the Company has received information of inter-se transfer of Shares amongst Promoter and Promoter Group.

This being an inter-se transfer of shares amongst Promoter Group, the same falls within exemption under Regulation 10(1)(a)(i) and (ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (immediate relatives and qualifying person being persons named as promoters in the shareholding pattern filed by the target company for not less than three years prior to the proposed acquisition.

The aggregate holding of the Promoter and Promoter group before and after the above inter-se transaction remains the same.

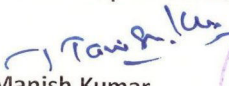
In this connection, necessary disclosure under Regulation 10(5) from the above said acquisition in prescribed format, as submitted by the acquirer is enclosed herewith for your kind information and records.

You are requested to take note of the same.

Thanking you.

Yours faithfully,

For SPA Capital Services Limited

  
**Manish Kumar**  
**Company Secretary & Compliance Officer**  
Place: - New Delhi

Date: 07/11/2024

Place: New Delhi



**Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1.	Name of the Target Company (TC)	SPA Capital Services Limited
2.	Name of the acquirer(s)	Kamal Kishore Somani
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Kamal Kishore Somani HUF
	b. Proposed date of acquisition	Anytime after 4 working days from the date of this intimation
	c. Number of shares to be acquired from each person mentioned in 4(a) above	35,000 (from Kamal Kishore Somani HUF)
	d. Total shares to be acquired as % of share capital of TC	1.14%
	e. Price at which shares are proposed to be acquired	NIL (Gift)
	f. Rationale, if any, for the proposed transfer	Inter-se transfer among Promoter and Promoter Group
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	General exemption under Regulation 10(1) (a) of the SEBI SAST Regulations
6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.	NA
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	NA

8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.			NA			
9.	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)			Yes, the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011			
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.			The acquirer hereby confirm that the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.			
11.	Shareholding details			Before the proposed transaction		After the proposed transaction	
				No. of shares/voting rights	% w.r.t total share capital of TC	No. of shares/voting rights	% w.r.t total share capital of TC
	a	Acquirer(s) and PACs (other than sellers)(* )	Kamal Kishore Somani	210175	6.84%	245175	7.98%
	b	Seller (s)	Kamal Kishore Somani HUF	35000	1.14%	Nil	Nil



**Kamal Kishore Somani**  
Acquirer/ Promoter

Date: 07/11/2024

Place: New Delhi

**Note:**


- (\*) Shareholding of each entity may be shown separately and then collectively in a group.
- The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.

**Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1.	Name of the Target Company (TC)	SPA Capital Services Limited
2.	Name of the acquirer(s)	Sandeep parwal
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Kamal Kishore Somani
	b. Proposed date of acquisition	Anytime after 4 working days from the date of this intimation
	c. Number of shares to be acquired from each person mentioned in 4(a) above	2,45,175 (from Kamal Kishore Somani )
	d. Total shares to be acquired as % of share capital of TC	7.98%
	e. Price at which shares are proposed to be acquired	NIL (Gift)
	f. Rationale, if any, for the proposed transfer	Inter-se transfer among Promoter and Promoter Group
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	General exemption under Regulation 10(1)(a) of the SEBI SAST Regulations
6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.	NA
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	NA



8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.		NA				
9.	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)		Yes, the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011				
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.		The acquirer hereby confirm that the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.				
11.	Shareholding details		Before the proposed transaction		After the proposed transaction		
			No. of shares/voting rights	% w.r.t total share capital of TC	No. of shares/voting rights	% w.r.t total share capital of TC	
	a	Acquirer(s) and PACs (other than sellers)(*)	Sandeep Parwal	275450	8.96%	520625	16.94%
	b	Seller (s)	Kamal Kishore Somani	245175	7.98%	Nil	Nil

  
 Sandeep Parwal  
 Acquirer/ Promoter

Date: 07/11/2024

Place: New Delhi