June 30, 2020

The BSE Ltd. Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001 Phones: 022 - 2272 1233 Fax: 91-22-22721919

Security Code No.: 542376

Sub: Fund raising by issuance of Debt Securities by Large Entities

Ref: SEBI Circular No SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018

With reference to the SEBI Circular No. SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018, BSE Circular No. LIST/COMP/05/2019-20 dated April 11, 2019 and BSE Circular No. LIST/COMP/59/2019-20 dated March 03, 2020 with respect to fund raising by issuance of Debt Securities by large entities and disclosures and Compliances thereof by such large entitles.

In this regard, we wish to submit that our Company does not fall under the criteria of **"Large Corporate"** as specified the said SEBI Circular.

This is for your kind information and record.

Thanking you.

Yours faithfully, *for SPA Capital Services Limited*

Kajal Gupta Company Secretary & Compliance Officer