

# INDIAN BRIGHT STEEL CO LTD

CIN: L29100MH1960PLC011794

G-6, 8th Floor, Everest Building, Janata Nagar, Tardeo Road,  
Tardeo, Mumbai – 400034.

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indianbrightsteelco@gmail.com  
info@azadcoaches.com

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**Date: 03<sup>rd</sup> May, 2024**

To,  
The Chief General Manager  
Listing Operation, BSE Limited,  
P. J. Towers, Dalal Street,  
Mumbai – 400 001.

**Subject: Request received for reclassification from the “Promoter and Promoter group” category to “Public” category shareholder of the company from the Individual Promoters of the Company.**

**Scrip Code: 504731**

With reference to the captioned subject and pursuant to Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (“Listing Regulations”) we wish to inform you that the Company has received request from the following Individual Promoters of the Company for reclassification from the “Promoter and Promoter group” category to “Public” category shareholder of the company, the details of which are as under:

Sr No.	Name of Shareholders	Category(Pre-Classification)	Category (Post-Classification)*	No. of Shares held	% Of Shares held
01	Mr. Avinash Jajodia	Promoter Group	Public	1400	0.00
02	Ms. Shamoli Malhotra	Promoter Group	Public	100	0.00
03	Mrs. Manju Devi Jajodia	Promoter Group	Public	100	0.00

The copies of the request letters received from the individual Promoters are enclosed herewith.  
Kindly take the same on record.

Thanking You,

Yours Sincerely,

**For Indian Bright Steel Co Limited**

**Vedant Bhatt**  
**Company Secretary & Compliance Officer**

Encl: a/a

*Shamoli Malhotra*

*'The Retreat'  
3, Pochkhanwala Road,  
Worli, Mumbai – 400030*

Date: 2nd May, 2024

To,  
The Board of Directors,  
Indian Bright Steel Co Limited  
AURUM PLATZ, C.S.NO.406, MALABAR HILL DIVISION 'D' WARD,  
B. N. CROSSLANE, PANDITA RAMABAI MARG, Mumbai City,  
MUMBAI, Maharashtra, India, 400007

**Sub: Request for re-classification from the “Promoter and Promoter group” category to “Public” category shareholder of Indian Bright Steel Co Limited (“the Company”) in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (“Listing Regulations”)**

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Dear Sir/Madam,

**1. Background**

- 1.1 I, Shamoli Malhotra, wish to inform that pursuant to Share Purchase Agreement dated November 22, 2023 with the Promoter Group member, Mr. Bupinder Singh Chadha (“Acquirer-1”) and Mr. Charnjit Singh Chadha (“Acquirer-2”) (Acquirer-1 and Acquirer-2 are jointly referred to as the “Acquirers”) subsequent to open offer became new Promoters of the Company in accordance with Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011. Therefore, I would request you to reclassify me alongwith my shareholding from the “Promoter and Promoter Group” category to “Public” category shareholder of the Company in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (“Listing Regulations”).
- 1.2 I have been disclosed as part of the Promoter of the Company. As on the date of this letter, I hold 100 equity shares aggregating to 0.0004% of Equity Share Capital of the Company. I, also confirm that I alongwith my immediate relatives do not hold more than 10% Equity Shares of the Company.

I wish to confirm following:

- a. As on date of this letter, I hold 0.0004% of Equity Share Capital of the Company;
- b. I do not exercise any control over the affairs of the Company, directly or indirectly;
- c. I do not have any special rights, through formal or informal arrangement, and not privy to any price sensitive information relating to the Company and its securities;

- d. I have not nominated any directors on the board of directors of the Company; and
- e. I am not related to the new Promoter and Promoter Group of the Company.

**2. Request for Re-classification**

2.1 In the culmination of the above, I request the board of directors of the Company to take on record my request for re-classification as public shareholders in accordance with Regulation 31A of the Listing Regulations and take all the necessary steps in this regard.

2.2 As required under Regulation 31A(3)(b) of the Listing Regulations, I hereby confirm that:

- i. I along with my immediate relatives do not hold more than ten percent of the total voting rights in the Company – Kindly refer Annexure I;
- ii. I do not exercise control over the affairs of the Company whether directly or indirectly;
- iii. I do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- iv. I do not have any representation on the Board of Directors of the Company;
- v. I do not act as a Key Managerial Person in the Company;
- vi. I am not 'willful defaulter' as per the guidelines issued by Reserve Bank of India;
- vii. I have not been categorized as a fugitive economic offender.

2.3 Further, I have complied with the requirements specified in Regulation 31A of the Listing Regulations.

I shall endeavour to provide all necessary information/ documents as may be required with respect to the re-classification, as and when required, to facilitate the process.

Thanking you.

Yours Truly,



SHAMOLI MALHOTRA

Annexure I – Based on Shareholding of the Company as of 26<sup>th</sup> April 2024

Name	Relationship	Category	No of Shares	%
Ms. Shamoli Malhotra	NA	Promoter	100	0.0004
Mr. Avinash Jajodia	Brother	Promoter	1,400	0.006
Mrs. Manju Devi Jajodia	Mother	Promoter	100	0.0004
Late Mr. Sajjan Kumar Jajodia	Uncle	Promoter	500	0.002

*Shamoh.*

# *Manjudevi Jajodia*

*'Basant Villa'*  
67-C, Bhulabhai Desai Road,  
Mumbai - 400026

Date: 2nd May, 2024

To,  
The Board of Directors,  
Indian Bright Steel Co Limited  
AURUM PLATZ, C.S.NO.406, MALABAR HILL DIVISION 'D' WARD,  
B. N. CROSSLANE, PANDITA RAMABAI MARG, Mumbai City,  
MUMBAI, Maharashtra, India, 400007

**Sub: Request for re-classification from the "Promoter and Promoter group" category to "Public" category shareholder of Indian Bright Steel Co Limited ("the Company") in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("Listing Regulations")**

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Dear Sir/Madam,

## **1. Background**

- 1.1 I, Manju Devi Jajodia, wish to inform that pursuant to Share Purchase Agreement dated November 22, 2023 with the Promoter Group member, Mr. Bupinder Singh Chadha ("Acquirer-1") and Mr. Charnjit Singh Chadha ("Acquirer-2") (Acquirer-1 and Acquirer-2 are jointly referred to as the "Acquirers") subsequent to open offer became new Promoters of the Company in accordance with Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011. Therefore, I would request you to reclassify me alongwith my shareholding from the "Promoter and Promoter Group" category to "Public" category shareholder of the Company in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("Listing Regulations").
- 1.2 I have been disclosed as part of the Promoter of the Company. As on the date of this letter, I hold 100 equity shares aggregating to 0.0004% of Equity Share Capital of the Company. I, also confirm that I alongwith my immediate relatives do not hold more than 10% Equity Shares of the Company.

I wish to confirm following:

- a. As on date of this letter, I hold 0.0004% of Equity Share Capital of the Company;
- b. I do not exercise any control over the affairs of the Company, directly or indirectly;
- c. I do not have any special rights, through formal or informal arrangement, and not privy to any price sensitive information relating to the Company and its securities;



- d. I have not nominated any directors on the board of directors of the Company; and
- e. I am not related to the new Promoter and Promoter Group of the Company.

**2. Request for Re-classification**

- 2.1 In the culmination of the above, I request the board of directors of the Company to take on record my request for re-classification as public shareholders in accordance with Regulation 31A of the Listing Regulations and take all the necessary steps in this regard.
- 2.2 As required under Regulation 31A(3)(b) of the Listing Regulations, I hereby confirm that:
- i. I alongwith my immediate relatives do not hold more than ten percent of the total voting rights in the Company – Kindly refer Annexure I;
  - ii. I do not exercise control over the affairs of the Company whether directly or indirectly;
  - iii. I do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
  - iv. I do not have any representation on the Board of Directors of the Company;
  - v. I do not act as a Key Managerial Person in the Company;
  - vi. I am not 'willful defaulter' as per the guidelines issued by Reserve Bank of India;
  - vii. I have not been categorized as a fugitive economic offender.
- 2.3 Further, I have complied with the requirements specified in Regulation 31A of the Listing Regulations.

I shall endeavour to provide all necessary information/ documents as may be required with respect to the re-classification, as and when required, to facilitate the process.

Thanking you.

Yours Truly,



**MANJU DEVI JAJODIA**

Annexure I – Based on Shareholding of the Company as of 26<sup>th</sup> April 2024

Name	Relationship	Category	No of Shares	%
Mrs. Manju Devi Jajodia	NA	Promoter	100	0.0004
Ms. Shamoli Malhotra	Daughter	Promoter	100	0.0004
Mr. Avinash Jajodia	Son	Promoter	1,400	0.006
Late Mr. Sajjan Kumar Jajodia	Brother-in-Law	Promoter	500	0.002

*Jajodia*

*Avinash Jajodia*

*'Basant Villa'*  
67-C, Bhulabhal Desai Road,  
Mumbai - 400026.

Date: 2nd May, 2024

To,  
The Board of Directors,  
Indian Bright Steel Co Limited  
AURUM PLATZ, C.S.NO.406, MALABAR HILL DIVISION 'D' WARD,  
B. N. CROSSLANE, PANDITA RAMABAI MARG, Mumbai City,  
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Dear Sir/Madam,

**1. Background**

1.1 I, Avinash Jajodia, wish to inform that pursuant to Share Purchase Agreement dated November 22, 2023 with the Promoter Group member, Mr. Bupinder Singh Chadha ("Acquirer-1") and Mr. Charnjit Singh Chadha ("Acquirer-2") (Acquirer-1 and Acquirer-2 are jointly referred to as the "Acquirers") subsequent to open offer became new Promoters of the Company in accordance with Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011. Therefore, I would request you to reclassify me alongwith my shareholding from the "Promoter and Promoter Group" category to "Public" category shareholder of the Company in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("Listing Regulations").

1.2 I have been disclosed as part of the Promoter of the Company. As on the date of this letter, I hold 1400 equity shares aggregating to 0.006% of Equity Share Capital of the Company. I, also confirm that I alongwith my immediate relatives do not hold more than 10% Equity Shares of the Company.

I wish to confirm following:

- a. As on date of this letter, I hold 0.006% of Equity Share Capital of the Company;
- b. I do not exercise any control over the affairs of the Company, directly or indirectly;
- c. I do not have any special rights, through formal or informal arrangement, and not privy to any price sensitive information relating to the Company and its securities;



- d. I have not nominated any directors on the board of directors of the Company; and
- e. I am not related to the new Promoter and Promoter Group of the Company.

**2. Request for Re-classification**

- 2.1 In the culmination of the above, I request the board of directors of the Company to take on record my request for re-classification as public shareholders in accordance with Regulation 31A of the Listing Regulations and take all the necessary steps in this regard.
- 2.2 As required under Regulation 31A(3)(b) of the Listing Regulations, I hereby confirm that:
- i. I alongwith my immediate relatives do not hold more than ten percent of the total voting rights in the Company – Kindly refer **Annexure I**;
  - ii. I do not exercise control over the affairs of the Company whether directly or indirectly;
  - iii. I do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
  - iv. I do not have any representation on the Board of Directors of the Company;
  - v. I do not act as a Key Managerial Person in the Company;
  - vi. I am not 'willful defaulter' as per the guidelines issued by Reserve Bank of India;
  - vii. I have not been categorized as a fugitive economic offender.
- 2.3 Further, I have complied with the requirements specified in Regulation 31A of the Listing Regulations.

I shall endeavour to provide all necessary information/ documents as may be required with respect to the re-classification, as and when required, to facilitate the process.

Thanking you.

Yours Truly,



**AVINASH JAJODIA**

Annexure I – Based on Shareholding of the Company as of 26<sup>th</sup> April 2024

Name	Relationship	Category	No of Shares	%
Mr. Avinash Jajodia	NA	Promoter	1,400	0.006
Ms. Shamoli Malhotra	Sister	Promoter	100	0.0004
Mrs. Manju Devi Jajodia	Mother	Promoter	100	0.0004
Late Mr. Sajjan Kumar Jajodia	Uncle	Promoter	500	0.002

A.I.