

Date: March 12, 2021

To,  
**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai- 400 001.

**Sub.: Intimation of request received for Re-classification by Promoter and Person falling under Promoter Group under Regulation 31A SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

**Ref.: Ratnabhumi Developers Limited (Security ID: RATNABHUMI/ Scrip Code: 540796)**

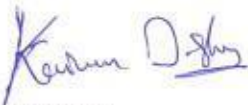
The company is in receipt of requests under Regulation 31A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 from Mrs. Meghna Munir Shah and Mr. Munir Shah seeking re-classification from 'Promoter and Promoter Group' Category to 'Public' Category.

Further other than BSE Limited (SME Segment), our Company is not listed on any other Stock Exchange. The above re-classification shall be subject to the approval of the Board of Directors, Members of the Company and BSE Limited

Request received from the above-mentioned Promoter and Person falling under Promoter Group of the Company is enclosed herewith, kindly take the same in your records and oblige us.

Thanking You,

For, Ratnabhumi Developers Limited



**Kaivan Shah**  
Chairman and Managing Director  
DIN: 01887130



Encl:- A/a

**RATNABHUMI DEVELOPERS LIMITED**

Register Office: s.f. 207, turquoise, panchvati panch rasta,  
Nr. White house e.b., c.g. Road, Ahmedabad, Ahmedabad,  
gujarat, india, 380009. | contact 079 26424209  
Email : info@ratnagroup.co.in | CIN: ~~545200GJ2000PLC048776~~

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**MEGHNA MUNIR SHAH**

27, Maharashtra Society, Anmol Mithakali Owner's Association, Mithakali, Ahmedabad, Gujarat-380009

Date: March 12, 2021

To,  
The Board of Directors  
**Ratnabhumi Developers Limited,**  
S.F. 207, Turquoise, Panchvati Panch Rasta,  
Nr. White House E.B., C.G. Road Ahmedabad – 380009

Dear Sir/Ma'am,

**Sub.: Request Letter for Re-classification from Promoter and Promoter Group to Public Category as per Regulation 31A of SEBI LODR Regulations, 2015.**

**Background**

I was the Promoter and Whole-Time Director of the Company since October 1, 2016.

My husband, Mr. Munir Shah was Non- Executive Director of the Company since July 31, 2017 and he is falling part of my Promoter Group holding 20 Shares.

**Present Status**

I resigned as Whole-Time Director of the Company w.e.f February 16, 2021 and since then I have never been involved in the operations and management of the company in any manner nor I have attended any management level meetings of the Company. I have also not drawn any salary or received any incentives, advisory fees or any form of remuneration since my resignation as Whole-Time Director. Further my Husband resigned as Non-Executive Director of the Company w.e.f February 16, 2021 and since then he had not attended any management level meetings of the Company. Further, I have sold my holding of 4998000 shares in Ratnabhumi Developers Limited in February 2021. As on Current Date, I hold 1900 Shares constituting to 0.01% of Total Share Capital of Company. I could not sell my remaining holding of 1900 Shares nor could my husband sell his 20 Shares, as these shares makes an odd lot to be transacted for Ratnabhumi Developers Limited being a SME Listed Company.

I hereby also confirm the following:-

1. I along with persons related to promoter seeking re-classification do not hold more than 10% of the total voting rights of the Company.
2. I do not exercise control over the affairs of the Company directly or indirectly.
3. I do not have any special rights with respect to the listed entity through formal or informal arrangements including through any shareholder agreements.
4. I do not act as A Key Managerial Personnel of the Company.
5. I am not a 'wilful defaulter' as per the Reserve Bank of India Guidelines;
6. I am not a fugitive economic offender

**Request for Re-Classification**

In light of reason and submission provided in this letter, I seek to declassify myself as 'promoter' of the Company and I further request the Company to initiate required actions in terms of Regulation 31A of the SEBI (LODR) Regulations, 2015 and amendment thereto and make necessary application to the Stock Exchange for such re-classification of my status in the Company within the time period as stipulated thereunder.

*Meghna Shah*



**MEGHNA MUNIR SHAH**

27, Maharashtra Society, Anmol Mithakali Owner's Association, Mithakali, Ahmedabad, Gujarat-380009

I further confirm that, at all times from the date of such reclassification, I shall continue to comply with conditions mentioned Regulation 31A of SEBI (LODR) Regulations, 2018 (as amended) post reclassification from "Promoter & Promoter Group" to "Public .

Thanking You

Yours Faithfully,

**MEGHNA MUNIR SHAH**

*Meghna Munir Shah*

**MUNIR SHAH**

27-D, Maharashtra Society, Anmol Mithakali Owner's Association, Mithakali, Ahmedabad, Gujarat-380009

Date: March 12, 2021

To,  
The Board of Directors  
**Ratnabhumi Developers Limited,**  
S.F. 207, Turquoise, Panchvati Panch Rasta,  
Nr. White House E.B., C.G. Road Ahmedabad – 380009

Dear Sir/Ma'am,

**Sub.: Request Letter for Re-classification from Promoter and Promoter Group to Public Category as per Regulation 31A of SEBI LODR Regulations, 2015.**

**Background**

My wife, Mrs. Meghna Shah was a Promoter and Whole Time Director of the Company since October 1, 2016 and therefore I was falling under Promoter and Promoter Group holding 20 shares as per Last Shareholding Pattern filed by Company for period ended on September 30, 2020. Further I was a Non-Executive Director of the Company since July 31, 2017.

**Present Status**

I resigned as Non-Executive Director of the Company w.e.f February 16, 2021 and since then I have not attended any management level meetings of the Company. My wife has resigned as Whole-Time Director of the Company w.e.f February 16, 2021 and since then she has never been involved in the operations and management of the company in any manner nor she has attended any management level meetings of the Company. Further she had also not drawn any salary or received any incentives, advisory fees or any form of remuneration since her resignation as Whole-Time Director.

Further, My wife has sold her holding of 4998000 shares in Ratnabhumi Developers Limited in February 2021. As on Current Date, She is holding 1900 Shares constituting to 0.01% of Total Share Capital of Company. She could not sell her remaining holding of 1900 Shares nor could I sell my holding of 20 Shares, as these shares makes an odd lot to be transacted for Ratnabhumi Developers Limited being a SME Listed Company.

I hereby also confirm the following:-

1. I along with Promoter and Promoter Group seeking re-classification do not hold more than 10% of the total voting rights of the Company.
2. I do not exercise control over the affairs of the Company directly or indirectly.
3. I do not have any special rights with respect to the listed entity through formal or informal arrangements including through any shareholder agreements.
4. I do not act as A Key Managerial Personnel of the Company.
5. I am not a 'wilful defaulter' as per the Reserve Bank of India Guidelines;
6. I am not a fugitive economic offender

  
Munir Shah

