

Date: 29.06.2019

**National Stock Exchange**

Exchange Plaza,  
Plot No. C/1, G Block,  
Bandra (E), Mumbai-400051  
Fax 022-6641 8124/25

**BSE Limited**

Phiroze Jeejeebhoy Towers  
Dalal Street,  
Mumbai-400001  
Fax: 022-2272 3121

**(NSE Scrip Code: SPMLINFRA)**

**(BSE Scrip Code: 500402)**

**Subject: Compliance under Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015**

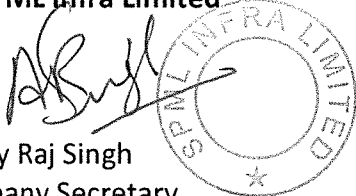
**Dear Sir,**

In compliance with Regulation 23(9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015, please find attached disclosures of related party transactions on a consolidated basis, for the half year ended 31st March, 2019.

You are requested to kindly take the same on record.

Thanking You,

Yours faithfully  
for **SPML Infra Limited**



Abhay Raj Singh  
Company Secretary

**SPML INFRA LIMITED**

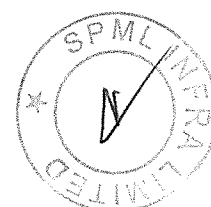
SPML House, Plot No. 65, Sector-32 Institutional Area, Gurugram - 122001, Haryana  
Ph: +91-124-2384141. Fax: +91-124-3983201. Email: info@spml.co.in  
www.spml.co.in CIN No. L40106DL1981PLC012228



**SPML INFRA LIMITED**

Disclosure under Regulation 23(9) of SEBI Listing Obligations and Disclosure Requirements) Regulations, 2015 for the half ended 31st March, 2019

<b>(a) Particulars of Related Parties with whom transactions have taken place during the year</b>	
<b>Associates Companies</b>	Sanamti Infra Developers Private Limited PT Vardhaman Mining Services PT Vardhaman Logistics Rabaan (S) Pte Limited PT Bina Insan Sukses Mandiri Bhilwara Jaipur Toll Road Private Limited SPML Bhiwandi Water Supply Infra Limited SPML Bhiwandi Water Supply Management Limited Aurangabad Jal Constructions Private limited Aurangabad Jal Supply Solution Private Limited
<b>Joint Ventures</b>	SPML-CISC JV OM Metals Consortium JV Siddharth- Mahaveer SPML -JV SPML-HCIL JV SUEZ -SPML JV SPML - Simplex JV M&P+Subhash JV KBL-SPML JV SPML-OM Metals JV SPML-SEW-AMR JV SMS-SPML JV MEIL-SPML JV SPML - SMC Infrastructure
<b>Joint Ventures</b>	Malviya Nagar Water Services Pvt .Ltd Hydro Comp Enterprises (India) Limited Aurangabad City Water Utility Co. Limited MVV Water Utility Private Limited Gurha Thermal Power Co Ltd
<b>Key Management Personnel (KMP)</b>	Mr. Subhash Chand Sethi, Chairman Mr. Sushil Kumar Sethi, Managing Director Mr. Sujit Kumar Jhunjhunwala, Chief Financial Officer Mr. Abhay Raj Singh, Company Secretary
<b>Relatives of Key Management Personnel</b>	
Mr. Anil Kumar Sethi Mr. Harshavardhan Sethi Mrs. Maina Devi Sethi Mrs. Noopur Jain Mrs. Suman Sethi Mr. Abhinandan Sethi Mrs. Sandhya Rani Sethi Mr. Rishabh Sethi Mrs. Shilpa Sethi Dr. Ankit Jain Mrs. Priyanshi Sethi Mrs. Aanchal Sethi	Brother of Chaiman & Managing Director Son of Chairman Mother of Chairman and Managing Director Daughter of Managing Director Wife of Chairman Son of Chairman Wife of Managing Director Son of Managing Director Daughter in law of Chairman Son-in-law of Managing Director Daughter in law of Chairman Daughter in law of Managing Director
<b>Enterprises owned by KMP's or their relatives or where the KMP's have significantly influence</b>	Arihant Leasing & Holding Company Limited ADD Realty Limited Add Eco Enviornment Limited ADD Industrial Park (TN) Limited Bharat Hydro Power Corporation Limited DWMG Software Private Limited International Construction Limited Latur Water Supply Managment Company Limited Meena Holdings Limited Meena ADD Charity Initiative Foundation Niral Enterprises Private Limited Om Metal-SPML Infra Project Private Limited



Pondicherry Sez Company Private Limited  
Pondicherry Port Limited  
POM POM Recycling Private Limited  
Sanmati Corporate Investments Private Limited  
Sanmati Power Company Private Limited  
VidyaEdutech Private Limited  
SPM Engineers Limited  
SPML India Limited  
Sethi Infratech Private Limited  
Subhash Systems Private Limited  
SPML Industries Limited  
Zoom Industrial Services Limited  
20th Century Engineering Limited  
Peacock Pearl Business Solution Private Limited  
Rishabh Homes Private Limited  
Acropolis Properties Private Limited  
Amrutha Constructions Private Limited  
JWIL Infra Limited  
Techno Mechanical Services Private Limited

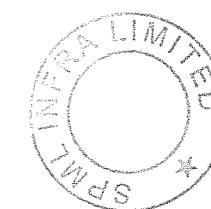
**Note:-** Related Party relationships as mentioned in the above list are determined by management based on nature of 'control' that the company exercises over the other companies.



SPML INFRA LIMITED

Rs In Lacs

Company Name	FY	Transactions during the year											Debit Balance	Credit Balance	
		Sale of Goods & Services	Purchase of Goods & Services	Interest Paid	Donation Paid	Interest Received	Loan/Advance Taken	Loan/Advance Given/Repaid/Share Application Money	Sale/transfer of Investments	Purchase of Investments	Rent Paid/Accrued	Managerial Remuneration/Salary			Commission Received
<b>ASSOCIATES COMPANIES</b>															
Sanmati Infra Developers Private Limited	2018-19	-	-	-	-	-	3.69	3.69	-	-	-	-	-	-	-
	2017-18	-	-	-	-	(10.24)	-	(0.81)	-	-	-	-	-	(82.84)	-
SPML Bhiwandi Water Supply Infra Limited	2018-19	-	-	-	-	153.75	5.46	1.58	-	-	-	-	-	1,429.16	93.80
	2017-18	-	-	-	-	(147.68)	-	(0.01)	-	-	-	-	-	(1,290.26)	(93.80)
SPML Bhiwandi Water Supply Management Limited	2018-19	-	-	-	-	4.91	-	1.58	-	-	-	-	-	68.20	-
	2017-18	-	-	-	-	(4.32)	-	(0.01)	-	-	-	-	-	(62.20)	-
P.T Bina Insan Sukes Mandiri	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	2017-18	-	-	-	-	-	(1,809.11)	-	-	-	-	-	-	-	(3,649.81)
<b>JOINT VENTURES</b>															
Malviya Nagar Water Services Private Limited	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	450.16	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	(450.16)	-
Gurha Thermal Power Company Limited	2018-19	-	-	-	-	133.79	-	-	-	-	-	-	-	1,190.94	-
	2017-18	-	-	-	-	(120.26)	-	-	-	-	-	-	-	(1,070.53)	-
MVV Water Utility Private Limited	2018-19	-	-	-	-	2.57	56.83	97.95	-	-	-	-	-	416.04	-
	2017-18	-	-	-	-	(2.57)	(31.15)	(54.65)	-	-	-	-	-	(372.60)	-
Aurangabad City Water Utility Company Limited	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	227.40	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	(227.40)	-
Hydro Comp Enterprises (India) Limited	2018-19	-	-	-	-	-	-	0.19	-	-	-	-	-	0.51	-
	2017-18	-	-	-	-	-	-	(0.31)	-	-	-	-	-	(131.80)	-
<b>JOINT OPERATIONS</b>															
OM Metals Consortium JV	2018-19	-	-	-	-	-	-	-	718.46	-	-	-	-	200.00	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	(918.46)	-
Siddharth- Mahaveer SPML -JV	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	92.12	-
	2017-18	-	-	-	-	-	-	-	(3.88)	-	-	-	-	(88.27)	-
SPML-CISC JV	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	3.37	-
	2017-18	-	-	-	-	-	-	-	(16.69)	-	-	-	-	(3.37)	-
SPML-HCIL JV	2018-19	-	-	-	-	-	-	-	-	17.55	-	-	-	58.16	-
	2017-18	-	-	-	-	-	-	-	(83.20)	-	-	-	-	(40.60)	-
SUEZ -SPML JV	2018-19	1,660.53	-	-	-	-	-	-	-	-	-	-	-	448.58	-
	2017-18	(1,625.39)	-	-	-	-	-	-	-	-	-	-	-	(805.67)	-
SPML - Simplex JV	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	31.34	-
	2017-18	-	-	-	-	-	-	-	-	(2.73)	-	-	-	(31.34)	-
KBL-SPML JV	2018-19	66.78	-	-	-	-	-	-	-	-	-	-	-	815.91	-
	2017-18	(83.65)	-	-	-	-	-	-	-	-	-	-	-	(828.71)	-
M&P+Subhash JV	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	435.20	-
	2017-18	-	-	-	-	-	-	-	-	(1.51)	-	-	-	(435.20)	-
SMS-SPML JV	2018-19	-	-	-	-	-	-	-	1.86	-	-	-	-	-	24.38
	2017-18	-	-	-	-	-	-	-	-	(1.83)	-	-	-	-	(22.52)
SPML-OM Metal JV	2018-19	-	-	-	-	-	3.98	0.75	-	-	-	-	-	-	314.79
	2017-18	-	-	-	-	-	(76.41)	(88.96)	-	-	-	-	-	-	(311.56)
MEIL-SPML JV	2018-19	2,946.67	-	-	-	-	-	-	-	-	-	-	-	1,365.48	-
	2017-18	(8,250.04)	-	-	-	-	-	-	-	-	-	-	-	(1,307.14)	-
SPML - SMC Infrastructure	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	60.00	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	(60.00)	-
SPML-SEW-AMR Joint Venture	2018-19	-	-	-	-	-	-	-	-	-	-	-	849.15	-	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	(79.42)	-	-



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<b>KEY MANAGEMENT PERSONNEL (KMP)</b>															
Mr. Subhash Chand Sethi	2018-19	-	-	-	-	-	9.00	56.30	-	-	-	188.69	-	-	197.08
	2017-18	-	-	-	-	-	(19.50)	(158.33)	-	-	-	(113.14)	-	-	(202.67)
Mr. Sushil Kumar Sethi	2018-19	-	-	15.48	-	-	95.85	207.09	-	-	-	188.65	-	-	162.35
	2017-18	-	-	(12.50)	-	-	-	(0.40)	-	-	-	(119.14)	-	-	(110.85)
Mr. Sujit Kumar Jhunjunwala	2018-19	-	-	-	-	-	-	-	-	-	-	26.09	-	-	-
	2017-18	-	-	-	-	-	-	-	-	-	-	(22.73)	-	-	-
Mr. Abhay Raj Singh	2018-19	-	-	-	-	-	-	-	-	-	-	24.00	-	-	-
	2017-18	-	-	-	-	-	-	-	-	-	-	(24.15)	-	-	-
<b>RELATIVES OF KEY MANAGEMENT PERSONNEL</b>															
Mr. Anil Kumar Sethi	2018-19	-	-	8.64	-	-	-	-	-	-	-	-	-	-	49.26
	2017-18	-	-	(8.64)	-	-	(12.00)	(12.00)	-	-	-	(63.00)	-	-	(48.00)
Mr. Harshavardhan Sethi	2018-19	-	-	-	-	-	46.60	-	-	-	-	-	-	-	40.60
	2017-18	-	-	-	-	-	-	(6.00)	-	-	-	-	-	(6.00)	-
Mrs. Shilpa Sethi	2018-19	-	-	-	-	-	-	-	-	-	-	12.06	-	-	0.84
	2017-18	-	-	-	-	-	-	-	-	-	-	(12.06)	-	-	(0.86)
Mrs. Vineeta Sethi	2018-19	-	-	21.78	-	-	-	15.50	-	-	-	-	-	-	124.17
	2017-18	-	-	(21.78)	-	-	(15.50)	-	-	-	-	-	-	-	(136.50)
Mrs. Preeti Devi Sethi	2018-19	-	-	3.78	-	-	-	-	-	-	12.00	-	-	-	47.88
	2017-18	-	-	(3.78)	-	-	-	-	-	-	(14.16)	-	-	-	(41.63)
Mr. Abhinandan Sethi	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	-	1.30
	2017-18	-	-	-	-	-	(8.07)	(8.07)	-	-	-	-	-	-	-
Mr. Deepak Sethi	2018-19	-	-	0.93	-	-	30.00	30.00	-	-	-	116.88	-	-	10.87
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>ENTERPRISES OWNED OR SIGNIFICANTLY INFLUENCED BY KMP OR THEIR RELATIVES</b>															
Add eco Enviornment	2018-19	-	-	0.95	-	-	18.75	10.97	-	-	-	-	-	-	-
	2017-18	-	-	(1.35)	-	-	-	-	-	-	-	-	-	-	(6.92)
ADD Industrial Park (TN) Limited	2018-19	-	-	-	-	0.72	-	-	-	-	-	-	-	-	-
	2017-18	-	-	-	-	-	(0.20)	(0.22)	-	(229.00)	-	-	-	(229.00)	-
ADD Realty Ltd.	2018-19	-	-	-	-	1.05	44.47	44.47	-	371.25	-	-	-	-	-
	2017-18	-	-	-	-	-	(70.50)	-	-	(84.50)	-	-	-	(84.50)	-
Arihant Leasing & Holding Company Limited	2018-19	-	-	-	-	-	-	33.80	-	-	6.00	-	-	-	50.37
	2017-18	-	-	-	-	-	(32.25)	-	-	-	(6.00)	-	-	-	(84.17)
Bharat Hydro Power Corporation Limited	2018-19	-	-	36.25	-	7.76	81.00	610.89	-	364.04	-	-	-	159.71	204.51
	2017-18	-	-	(285.87)	-	-	(8.50)	(39.24)	(2,259.67)	-	-	-	-	-	(884.20)
DWMG Software Private Limited	2018-19	-	-	-	-	3.07	-	-	-	-	-	-	-	19.82	-
	2017-18	-	-	-	-	(2.39)	-	(7.20)	-	-	-	-	-	(17.06)	-
International Construction Limited	2018-19	-	-	0.46	-	0.04	10.25	19.46	-	-	-	-	-	1,046.20	-
	2017-18	-	(14.75)	-	-	(45.45)	(6.00)	(27.05)	-	-	-	-	-	(1,043.96)	-
Latur Water Supply Managment Company Limited	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	(626.23)	-
Meena ADD Charity Initiative Foundation	2018-19	-	-	-	2.50	-	-	-	-	-	-	-	-	-	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Meena Holdings Limited	2018-19	-	-	5.63	-	-	40.99	81.19	-	-	-	-	-	0.77	17.84
	2017-18	(16.10)	-	-	-	-	-	-	-	-	-	-	-	(8.75)	-
Niral Enterprises Private Limited	2018-19	-	-	147.35	-	-	-	26.66	-	-	-	-	-	-	1,298.46
	2017-18	-	-	(136.63)	-	-	-	(23.70)	-	-	-	-	-	-	(1,192.50)
Peacock Pearl Business Solution Private Limited	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	0.13	-
	2017-18	-	-	-	-	-	-	(0.02)	-	-	-	-	-	(0.13)	-
Chahel Infrastructure Limited (formerly : Pondicherry Port Ltd)	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	2017-18	-	-	-	-	-	-	(2.24)	-	-	-	-	-	(577.08)	-
Pondicherry Sez Company Private Limited	2018-19	-	-	96.15	-	-	-	35.00	-	-	-	-	-	-	824.31
	2017-18	-	-	(95.22)	-	-	-	(36.50)	-	-	-	-	-	-	(772.77)
POM POM Recycling Private Limited	2018-19	-	-	-	-	-	-	7.03	-	-	-	-	-	170.75	-
	2017-18	(0.51)	-	-	-	-	-	-	-	-	-	-	-	(163.72)	-
Sanmati Power Company Private Limited	2018-19	-	-	-	-	-	-	-	-	-	-	-	-	251.25	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	(251.25)	-
Sethi Infratech Private Limited	2018-19	-	-	0.01	-	-	-	-	-	-	-	-	-	-	0.07
	2017-18	-	-	(0.01)	-	-	-	(0.04)	-	-	-	-	-	-	(0.06)
VidyaEdutech Private Limited	2018-19	-	-	-	-	0.32	2.68	-	-	-	-	-	-	0.32	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	(2.68)	-

SPM Engineers Limited	2018-19	-	-	3.84	-	-	-	3.20	-	773.45	-	-	-	-	33.03
	2017-18	-	-	(89.22)	-	-	-	(12.00)	(996.80)	-	-	-	-	-	(32.77)
SPML India Limited	2018-19	-	-	101.94	-	-	170.00	420.25	-	-	-	-	-	-	734.72
	2017-18	-	-	(93.08)	-	-	(180.00)	(100.00)	-	-	-	-	-	-	(893.22)
SPML Industries Limited	2018-19	-	-	193.28	-	-	675.00	852.21	-	-	-	-	-	-	1,377.13
	2017-18	-	-	(141.13)	-	-	(593.00)	(32.55)	-	(104.00)	-	-	-	-	(1,380.39)
Subhash Systems Private Limited	2018-19	-	-	26.31	-	-	343.00	17.96	-	-	-	-	-	-	356.61
	2017-18	-	-	-	-	-	-	-	-	-	(15.63)	-	-	-	(7.89)
Zoom Industrial Services Limited	2018-19	-	-	77.28	-	-	75.00	1,630.52	-	-	-	-	-	-	20.32
	2017-18	-	-	(172.11)	-	-	-	(26.61)	-	-	-	-	-	-	(1,506.28)
20th Century Engineering Limited	2018-19	-	-	0.00	-	0.01	-	0.18	-	-	-	-	-	0.16	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	-	(0.02)
JWIL Infra Limited	2018-19	3,063.73	-	-	-	-	-	-	-	-	-	-	-	1,309.00	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Amrutha Constructions Private Limited	2018-19	-	9,346.43	-	-	182.49	3,568.56	554.60	-	0.49	-	-	-	3,204.03	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Acropolis Properties Private Limited	2018-19	-	-	-	-	-	1.08	-	-	-	-	-	-	1.08	-
	2017-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Note:

**C. Details of remuneration to Key Managerial Personnel is given below**

Particulars	2018-19	2017-18
- Short-term employee benefits	410.14	276.28
- Post employment benefits	17.28	2.88
	<b>427.42</b>	<b>279.16</b>

\* Unsecured Loans taken from Bharat Hydro Power Company Limited and SPM Engineers Limited in earlier years have been settled during the year 2017-18 through sale of investments in equity shares held by the company in group companies.

**Terms and conditions of transactions with related parties:**

The transactions with related parties are made on terms equivalent to those that prevail in arm's length transactions. Outstanding balances at the year-end are unsecured and settlement occurs in cash except as otherwise mentioned.

