

04th January, 2024

BSE Limited
Phirozejeejeebhoy Tower
Dalal Street,
Mumbai – 400 001

(BSE Scrip Code: 500402)

Sub: Clarification on disclosure under Regulation 31 of SEBI (SAST) Regulations 2011

Ref: Your e-mail dated 14th December, 2023 seeking clarification

Dear Sir,

This is with reference to the captioned subject.

In terms of the clarification sought by you, we would like to clarify the following –

1. Reason for encumbrance: Pledge is replaced by Repayment of Loan.
2. Name of the entity in whose favor shares are encumbered given.

Kindly take the above on record.

Regret for the inconvenience caused.

Thanking you,
For SPML Infra Limited

SUBHASH
CHAND
SETHI

Digitally signed by
SUBHASH CHAND
SETHI
Date: 2024.01.04
15:17:24 +05'30'

Subhash Chand Sethi
Director
DIN: 00464390

Encl.: As Above.

Annexure-3

Format for Disclosure by the Promoter(s) to the Stock Exchanges and to the Target Company for encumbrance of shares / invocation of encumbrance / release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

| Name of the Target Company (TC) | | | | | | | SPML Infra Limited | | | | | | | |
|---|--|--------------------------|------------------------------------|---|--------------------------|---|---|---|--|---------------|--------------------------|---|--|--------------------------|
| Names of the Stock Exchanges where the shares of the target company are listed | | | | | | | NSE & BSE | | | | | | | |
| Date of Reporting | | | | | | | 26.05.2023 | | | | | | | |
| Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked | | | | | | | Subhash Chand Sethi, Sushil Kumar Sethi, SPML India Ltd. and Arihant Leasing and Holding Ltd. | | | | | | | |
| Details of the creation/invocation/release of encumbrance: | | | | | | | Release | | | | | | | |
| Name of the promoter (s) or PACs with him (*) | Promoter holding in the target company (1) | | | Promoter holding already encumbered (2) | | Details of events pertaining to encumbrance (3) | | | | | | | Post event holding of encumbered shares {creation[(2)+(3)]/ release[(2)-(3)]/ invocation[(2)-(3)]} | |
| | No. of Shares | % of total share capital | % w.r.t. diluted share capital (*) | No. of shares | % of total share capital | Type of event (creation / release/ invocation) | Date of creation / invocation release of encumbrance | Type of encumbrance (pledge/lien/ non disposal undertaking/ others) | Reasons for encumbrances (**) (Creation of Pledge or Release or Invoke of Shares) | No. of shares | % of total share Capital | Name of the entity in whose favor shares encumbered (***) | No. of shares | % of total share capital |
| SUBHASH CHAND SETHI | 1523280 | 3.11 | 3.11 | 1523280 | 3.11 | Release | 17.05.2023 | Pledge | Repayment of loan | 1516245 | 3.09 | IFCI Ltd | 7035 | 0.02 |
| SUSHIL KUMAR SETHI | 1334660 | 2.72 | 2.72 | 1056985 | 2.16 | Release | 17.05.2023 | Pledge | Repayment of loan | 1056985 | 2.16 | IFCI Ltd | 0 | 0.00 |
| PUNAM CHAND SETHI (HUF) | 494625 | 1.01 | 1.01 | - | - | - | - | - | - | - | - | - | - | - |
| PUNAM CHAND SETHI | 372735 | 0.76 | 0.76 | - | - | - | - | - | - | - | - | - | - | - |
| SUMAN SETHI | 183735 | 0.38 | 0.38 | 183735 | 0.38 | - | - | - | - | - | - | - | 183735 | 0.38 |
| SANDHYA RANI SETHI | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| SUBHASH CHAND SETHI (HUF) | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| SUSHIL KUMAR SETHI (HUF) | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| ZOOM INDUSTRIAL SERVICES LTD | 7474600 | 15.26 | 15.26 | - | - | - | - | - | - | - | - | - | - | - |
| 20TH CENTURY ENGINEERING LTD | 1000000 | 2.04 | 2.04 | - | - | - | - | - | - | - | - | - | - | - |
| ARIHANT LEASING AND HOLDING LIMITED | 436020 | 0.89 | 0.89 | 436020 | 0.89 | Release | 17.05.2023 | Pledge | Repayment of loan | 436020 | 0.89 | IFCI Ltd | 0 | 0.00 |
| SPML INDIA LIMITED | 3855040 | 7.87 | 7.87 | 2119055 | 4.33 | Release | 17.05.2023 | Pledge | Repayment of loan | 2119055 | 4.33 | IFCI Ltd | 0 | 0.00 |
| NIRAL ENTERPRISES PVT LTD | 2596600 | 5.30 | 5.30 | - | - | - | - | - | - | - | - | - | - | - |
| BHARAT HYDRO POWER CORPORATION LIMITED | - | - | - | - | - | - | - | - | - | - | - | - | - | - |

On Behalf of Promoter Group



Subhash Chand Sethi

Place: Kolkata

Date: 04.01.2024