

28<sup>th</sup> May, 2021

To,  
**BSE Limited**  
 Listing Dept. / Dept. of Corporate Services,  
 Phiroze Jeejeebhoy Towers,  
 Dalal Street, Mumbai - 400 001.

To,  
**National Stock Exchange of India Limited**  
 Listing Dept., Exchange Plaza, 5<sup>th</sup> Floor,  
 Plot No. C/1, G. Block, Bandra-Kurla Complex,  
 Bandra (E), Mumbai - 400 051.

**Security Code: 539301**  
**Security ID : ARVSMART**

**Symbol: ARVSMART**

Dear Sir,

**Sub: Intimation of receipt of request for reclassification from 'promoter group' category to 'public' category shareholders in accordance with Regulation 30 and 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations").**

With reference to captioned subject and in accordance with Regulation 31A (8) of the SEBI LODR Regulations, this is to inform that the Company is in receipt of letters each dated 28<sup>th</sup> May, 2021 from the following persons requesting their reclassification from 'promoter group' category to 'public' category shareholders of the Company in accordance with Regulation 31A of the SEBI LODR Regulations:

Sr. No.	Name of the persons	Number of Equity Shares held	% of shareholding
1	Samvegbhai Arvindbhai Lalbhai	50,000	0.14%
2	Anamikaben Samvegbhai Lalbhai	0	0.00%
3	Saumya Samvegbhai Lalbhai	0	0.00%
4	Snehalben Samvegbhai Lalbhai	0	0.00%
5	Badlani Manini Rajiv	540	0.00%
6	Arvind Farms Private Limited	1,42,011	0.40%
7	Adore Investments Private Limited	0	0.00%
8	Amardeep Holdings Private Limited	0	0.00%
9	Samvegbhai Arvindbhai HUF	0	0.00%

The copies of the request letters are attached herewith.

You are requested to kindly take the above on your records and disseminate.

Thanking You,  
**For Arvind SmartSpaces Limited**

**Prakash Makwana**  
**Company Secretary**

Encl.: As above

Arvind SmartSpaces Limited  
 Regd. Office: 24, Government Servant Society,  
 Near Municipal Market, Off C. G. Road,  
 Navrangpura, Ahmedabad, 3800 009, India  
 Tel.: +91 79 68267000 Fax.: +91 79 68267021  
 CIN: L45201GJ2008PLC055771

**Samvegbhai Arvindbhai Lalbhai**  
"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad - 380009.

28<sup>th</sup> May 2021

To,  
**Board of Directors**  
**Arvind SmartSpaces Limited**  
24, Government Servant's Society,  
Nr. Municipal Market,  
Off C.G. Road, Navrangpura,  
Ahmedabad - 380009,  
Gujarat, India.

Dear Sir/ Madam,

**Sub.: Request for reclassification from 'promoter group' category to 'public' category in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations")**

I, Samvegbhai Arvindbhai Lalbhai, am a shareholder of Arvind SmartSpaces Limited ("Company" or "ASL") holding 50,000 equity shares of face value of Rs. 10/- each constituting 0.14% of total equity share capital of the Company. I am disclosed as a part of members of promoter group of the Company in the shareholding pattern filed by the Company with the BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE") (together, "Stock Exchanges") in accordance with the SEBI LODR Regulations. As on date, I am not holding any equity shares of the Company.

As on today, except for my shareholding in the Company, I am not, directly or indirectly, associated with the business of the Company and do not have any influence over the business and policy decisions made by the Company. Further, I am not involved in the day to day activities of the Company nor am I exercising any control over the affairs of the Company. Accordingly, I wish to reclassify myself from the 'promoter group' category to 'public' category of shareholder of the Company.

In connection with my request for reclassification, I hereby confirm and certify that -

1. I, along with the person related to me (as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018) -
  - a. do not, together, hold more than 10% (ten percent) of the total voting rights in the Company;
  - b. do not exercise control over the affairs of the Company, directly or indirectly;
  - c. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
  - d. are not represented on the board of directors of the Company (including through nominee director);
  - e. are not acting as a key managerial person in the Company;



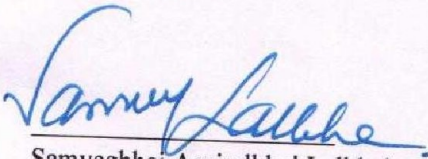
**Samvegbhai Arvindbhai Lalbhai**  
"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad - 380009.

- f. are not 'wilful defaulters' as per the Reserve Bank of India Guidelines; and
  - g. are not fugitive economic offenders.
2. There is no pending regulatory action against me;
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations at all times from the date of reclassification, failing which, I shall be reclassified as 'promoter group' category shareholders of the Company;
4. I shall comply with the conditions mentioned at sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as 'promoter group' category shareholders of the Company.

Further, as on date, I, along with the person related to me (as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018) do not, together, hold more than 1% (one percent) of the total voting rights in the Company.

In light of foregoing, I request the Board of Directors of the Company to consider and approve my request of reclassification from 'promoter group' category to 'public' category shareholders and make requisite application to the Stock Exchanges in accordance with Regulation 31A of the SEBI LODR Regulations.

Yours faithfully,

  
Samvegbhai Arvindbhai Lalbhai



**Anamikaben Samvegbhai Lalbhai**  
"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad – 380009.

28<sup>th</sup> May 2021

To,  
**Board of Directors**  
**Arvind SmartSpaces Limited**  
24, Government Servant's Society,  
Nr. Municipal Market,  
Off C.G. Road, Navrangpura,  
Ahmedabad – 380009,  
Gujarat, India.

Dear Sir/ Madam,

**Sub.: Request for reclassification from 'promoter group' category to 'public' category in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations")**

I, Anamikaben Samvegbhai Lalbhai, am disclosed as a part of members of promoter group of Arvind SmartSpaces Limited ("Company" or "ASL") in the shareholding pattern filed by the Company with the BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE") (together, "Stock Exchanges") in accordance with the SEBI LODR Regulations. As on date, I am not holding any equity shares of the Company.

As on today, I am not, directly or indirectly, associated with the business of the Company and do not have any influence over the business and policy decisions made by the Company. Further, I am not involved in the day to day activities of the Company nor am I exercising any control over the affairs of the Company. Accordingly, I wish to reclassify myself from the 'promoter group' category to 'public' category of shareholder of the Company.

In connection with my request for reclassification, I hereby confirm and certify that –

5. I, along with the person related to me (as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018) –
- h. do not, together, hold more than 10% (ten percent) of the total voting rights in the Company;
  - i. do not exercise control over the affairs of the Company, directly or indirectly;
  - j. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
  - k. are not represented on the board of directors of the Company (including through nominee director);
  - l. are not acting as a key managerial person in the Company;
  - m. are not 'wilful defaulters' as per the Reserve Bank of India Guidelines; and
  - n. are not fugitive economic offenders.



**Anamikaben Samvegbhai Lalbhai**

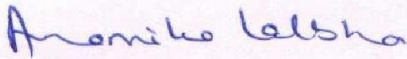
**"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad - 380009.**

6. There is no pending regulatory action against me;
7. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations at all times from the date of re-classification, failing which, I shall be reclassified as 'promoter group' category shareholders of the Company;
8. I shall comply with the conditions mentioned at sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as 'promoter group' category shareholders of the Company.

Further, as on date, I, along with the person related to me (*as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018*) do not, together, hold more than 1% (one percent) of the total voting rights in the Company.

In light of foregoing, I request the Board of Directors of the Company to consider and approve my request of reclassification from 'promoter group' category to 'public' category shareholders and make requisite application to the Stock Exchanges in accordance with Regulation 31A of the SEBI LODR Regulations.

Yours faithfully,



Anamikaben Samvegbhai Lalbhai



**Saumya Samvegbhai Lalbhai**  
"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad - 380009.

28<sup>th</sup> May 2021

To,  
**Board of Directors**  
**Arvind SmartSpaces Limited**  
24, Government Servant's Society,  
Nr. Municipal Market,  
Off C.G. Road, Navrangpura,  
Ahmedabad - 380009,  
Gujarat, India.

Dear Sir/ Madam,

**Sub.: Request for reclassification from 'promoter group' category to 'public' category in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations")**

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I, Saumya Samvegbhai Lalbhai, am disclosed as a part of members of promoter group of Arvind SmartSpaces Limited ("Company" or "ASL") in the shareholding pattern filed by the Company with the BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE") (together, "Stock Exchanges") in accordance with the SEBI LODR Regulations. As on date, I am not holding any equity shares of the Company.

As on today, I am not, directly or indirectly, associated with the business of the Company and do not have any influence over the business and policy decisions made by the Company. Further, I am not involved in the day to day activities of the Company nor am I exercising any control over the affairs of the Company. Accordingly, I wish to reclassify myself from the 'promoter group' category to 'public' category of shareholder of the Company.

In connection with my request for reclassification, I hereby confirm and certify that -

9. I, along with the person related to me (as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018) -
- o. do not, together, hold more than 10% (ten percent) of the total voting rights in the Company;
  - p. do not exercise control over the affairs of the Company, directly or indirectly;
  - q. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
  - r. are not represented on the board of directors of the Company (including through nominee director);
  - s. are not acting as a key managerial person in the Company;
  - t. are not 'wilful defaulters' as per the Reserve Bank of India Guidelines; and
  - u. are not fugitive economic offenders.



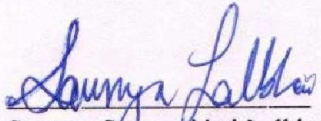
**Saumya Samvegbhai Lalbhai**  
"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad - 380009.

10. There is no pending regulatory action against me;
11. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations at all times from the date of reclassification, failing which, I shall be reclassified as 'promoter group' category shareholders of the Company;
12. I shall comply with the conditions mentioned at sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as 'promoter group' category shareholders of the Company.

Further, as on date, I, along with the person related to me (as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018) do not, together, hold more than 1% (one percent) of the total voting rights in the Company.

In light of foregoing, I request the Board of Directors of the Company to consider and approve my request of reclassification from 'promoter group' category to 'public' category shareholders and make requisite application to the Stock Exchanges in accordance with Regulation 31A of the SEBI LODR Regulations.

Yours faithfully,

  
Saumya Samvegbhai Lalbhai



**SNEHAL SAMVEGBHAI LALBHAI**  
**"Akshay", 1<sup>st</sup> Floor, 53 Shrimall Society,**  
**Navrangpura, Ahmedabad-380 009**

28<sup>th</sup> May 2021

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To,  
**Board of Directors**  
**Arvind SmartSpaces Limited**  
24, Government Servant's Society,  
Nr. Municipal Market,  
Off C.G. Road, Navrangpura,  
Ahmedabad – 380009,  
Gujarat, India.

Dear Sir/ Madam,

**Sub.: Request for reclassification from 'promoter group' category to 'public' category in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations")**

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I, Snehalben Samvegbhai Lalbhai, am disclosed as a part of members of promoter group of Arvind SmartSpaces Limited ("Company" or "ASL") in the shareholding pattern filed by the Company with the BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE") (together, "Stock Exchanges") in accordance with the SEBI LODR Regulations. As on date, I am not holding any equity shares of the Company.

As on today, I am not, directly or indirectly, associated with the business of the Company and do not have any influence over the business and policy decisions made by the Company. Further, I am not involved in the day to day activities of the Company nor am I exercising any control over the affairs of the Company. Accordingly, I wish to reclassify myself from the 'promoter group' category to 'public' category of shareholder of the Company.

In connection with my request for reclassification, I hereby confirm and certify that –

1. I, along with the person related to me (*as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018*) –
  - a. do not, together, hold more than 10% (ten percent) of the total voting rights in the Company;
  - b. do not exercise control over the affairs of the Company, directly or indirectly;
  - c. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
  - d. are not represented on the board of directors of the Company (including through nominee director);
  - e. are not acting as a key managerial person in the Company;
  - f. are not 'wilful defaulters' as per the Reserve Bank of India Guidelines; and
  - g. are not fugitive economic offenders.



**SNEHAL SAMVEGBHAI LALBHAI**

**"Akshay", 1<sup>st</sup> Floor, 53 Shrimall Society,  
Navrangpura, Ahmedabad-380 009**

2. There is no pending regulatory action against me;
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations at all times from the date of re-classification, failing which, I shall be reclassified as 'promoter group' category shareholders of the Company;
4. I shall comply with the conditions mentioned at sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as 'promoter group' category shareholders of the Company.

Further, as on date, I, along with the person related to me (*as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018*) do not, together, hold more than 1% (one percent) of the total voting rights in the Company.

In light of foregoing, I request the Board of Directors of the Company to consider and approve my request of reclassification from 'promoter group' category to 'public' category shareholders and make requisite application to the Stock Exchanges in accordance with Regulation 31A of the SEBI LODR Regulations.

Yours faithfully,



Snehalben Samvegbhai Lalbhai



MANINI RAJIV BADLANI  
Unit no. A-101, 78@Gokuldharm,  
Ulariya, Nr. Eklavya School,  
Sanand, Ahmedabad – 382210

28<sup>th</sup> May 2021

To,  
Board of Directors  
Arvind SmartSpaces Limited  
24, Government Servant's Society,  
Nr. Municipal Market,  
Off C.G. Road, Navrangpura,  
Ahmedabad – 380009,  
Gujarat, India.

Dear Sir/ Madam,

**Sub.: Request for reclassification from 'promoter group' category to 'public' category in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations")**

I, Badlani Manini Rajiv, am a shareholder of Arvind SmartSpaces Limited ("Company" or "ASL") holding 540 equity shares of face value of Rs. 10/- each constituting 0.00% of total equity share capital of the Company. I am disclosed as a part of members of promoter group of the Company in the shareholding pattern filed by the Company with the BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE") (together, "Stock Exchanges") in accordance with the SEBI LODR Regulations.

As on today, except for my shareholding in the Company, I am not, directly or indirectly, associated with the business of the Company and do not have any influence over the business and policy decisions made by the Company. Further, I am not involved in the day to day activities of the Company nor am I exercising any control over the affairs of the Company. Accordingly, I wish to reclassify myself from the 'promoter group' category to 'public' category of shareholder of the Company.

In connection with my request for reclassification, I hereby confirm and certify that –

5. I, along with the person related to me (*as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018*) –
- h. do not, together, hold more than 10% (ten percent) of the total voting rights in the Company;
  - i. do not exercise control over the affairs of the Company, directly or indirectly;
  - j. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
  - k. are not represented on the board of directors of the Company (including through nominee director);
  - l. are not acting as a key managerial person in the Company;
  - m. are not 'wilful defaulters' as per the Reserve Bank of India Guidelines; and
  - n. are not fugitive economic offenders.



MANINI RAJIV BADLANI  
Unit no. A-101, 78@Gokuldharm,  
Ulariya, Nr. Eklavya School,  
Sanand, Ahmedabad - 382210

6. There is no pending regulatory action against me;
7. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations at all times from the date of reclassification, failing which, I shall be reclassified as 'promoter group' category shareholders of the Company;
8. I shall comply with the conditions mentioned at sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as 'promoter group' category shareholders of the Company.

Further, as on date, I, along with the person related to me (*as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018*) do not, together, hold more than 1% (one percent) of the total voting rights in the Company.

In light of foregoing, I request the Board of Directors of the Company to consider and approve my request of reclassification from 'promoter group' category to 'public' category shareholders and make requisite application to the Stock Exchanges in accordance with Regulation 31A of the SEBI LODR Regulations.

Yours faithfully,



Badlani Manini Rajiv



**Adore Investments Pvt. Ltd.**  
**"Akshay", 53, Shrimali Society,**  
**Navrangpura,**  
**Ahmedabad – 380009.**

28<sup>th</sup> May 2021

To,  
**Board of Directors**  
**Arvind SmartSpaces Limited**  
24, Government Servant's Society,  
Nr. Municipal Market,  
Off C.G. Road, Navrangpura,  
Ahmedabad – 380009,  
Gujarat, India.

Dear Sir/ Madam,

**Sub.: Request for reclassification from 'promoter group' category to 'public' category in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations")**

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We, Adore Investments Private Limited, are disclosed as a part of members of promoter group of Arvind SmartSpaces Limited ("Company" or "ASL") in the shareholding pattern filed by the Company with the BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE") (together, "Stock Exchanges") in accordance with the SEBI LODR Regulations. As on date, we are not holding any equity shares of the Company.

As on today, we are not, directly or indirectly, associated with the business of the Company and do not have any influence over the business and policy decisions made by the Company. Further, we are not involved in the day to day activities of the Company nor are we exercising any control over the affairs of the Company. Accordingly, we wish to reclassify ourselves from the 'promoter group' category to 'public' category of shareholder of the Company.

In connection with our request for reclassification, we hereby confirm and certify that –

25. We, along with the person related to us (as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018) –
- qq. do not, together, hold more than 10% (ten percent) of the total voting rights in the Company;
  - rr. do not exercise control over the affairs of the Company, directly or indirectly;
  - ss. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
  - tt. are not represented on the board of directors of the Company (including through nominee director);
  - uu. are not acting as a key managerial person in the Company;
  - vv. are not 'wilful defaulters' as per the Reserve Bank of India Guidelines; and
  - ww. are not fugitive economic offenders.



**Adore Investments Pvt. Ltd.**

**"Akshay", 53, Shrimali Society,**

**Navrangpura,**

**Ahmedabad - 380009.**

26. There is no pending regulatory action against us;
27. We shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations at all times from the date of re-classification, failing which, we shall be reclassified as 'promoter group' category shareholders of the Company;
28. We shall comply with the conditions mentioned at sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations for a period of not less than three years from the date of reclassification, failing which, we shall be reclassified as 'promoter group' category shareholders of the Company.

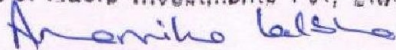
Further, as on date, we, along with the person related to us (as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018) do not, together, hold more than 1% (one percent) of the total voting rights in the Company.

In light of foregoing, we request the Board of Directors of the Company to consider and approve our request of reclassification from 'promoter group' category to 'public' category shareholders and make requisite application to the Stock Exchanges in accordance with Regulation 31A of the SEBI LODR Regulations.

Yours faithfully,

**For, Adore Investments Private Limited**

For Adore Investments Pvt. Ltd.



Anamika Lalbhai

Director



**Amardeep Holdings Pvt. Ltd.**

**"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad – 380009.**

28<sup>th</sup> May 2021

To,

**Board of Directors**

**Arvind SmartSpaces Limited**

24, Government Servant's Society,

Nr. Municipal Market,

Off C.G. Road, Navrangpura,

Ahmedabad – 380009,

Gujarat, India.

Dear Sir/ Madam,

**Sub.: Request for reclassification from 'promoter group' category to 'public' category in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations")**

We, Amardeep Holdings Private Limited, are disclosed as a part of members of promoter group of Arvind SmartSpaces Limited ("Company" or "ASL") in the shareholding pattern filed by the Company with the BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE") (together, "Stock Exchanges") in accordance with the SEBI LODR Regulations. As on date, we are not holding any equity shares of the Company.

As on today, we are not, directly or indirectly, associated with the business of the Company and do not have any influence over the business and policy decisions made by the Company. Further, we are not involved in the day to day activities of the Company nor are we exercising any control over the affairs of the Company. Accordingly, we wish to reclassify ourselves from the 'promoter group' category to 'public' category of shareholder of the Company.

In connection with our request for reclassification, we hereby confirm and certify that –

29. We, along with the person related to us (*as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018*) –

- xx. do not, together, hold more than 10% (ten percent) of the total voting rights in the Company;
- yy. do not exercise control over the affairs of the Company, directly or indirectly;
- zz. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- aaa. are not represented on the board of directors of the Company (including through nominee director);
- bbb. are not acting as a key managerial person in the Company;
- ccc. are not 'wilful defaulters' as per the Reserve Bank of India Guidelines; and
- ddd. are not fugitive economic offenders.



**Amardeep Holdings Pvt. Ltd.**

**"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad - 380009.**

30. There is no pending regulatory action against us;
31. We shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations at all times from the date of reclassification, failing which, we shall be reclassified as 'promoter group' category shareholders of the Company;
32. We shall comply with the conditions mentioned at sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations for a period of not less than three years from the date of reclassification, failing which, we shall be reclassified as 'promoter group' category shareholders of the Company.

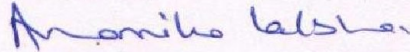
Further, as on date, we, along with the person related to us (*as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018*) do not, together, hold more than 1% (one percent) of the total voting rights in the Company.

In light of foregoing, we request the Board of Directors of the Company to consider and approve our request of reclassification from 'promoter group' category to 'public' category shareholders and make requisite application to the Stock Exchanges in accordance with Regulation 31A of the SEBI LODR Regulations.

Yours faithfully,

**For, Amardeep Holdings Private Limited**

For Amardeep Holdings v d



Anamika Lalbhai

Director



## **Arvind Farms Pvt. Ltd.**

**"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad – 380009.**

28<sup>th</sup> May 2021

To,

**Board of Directors**

**Arvind SmartSpaces Limited**

24, Government Servant's Society,

Nr. Municipal Market,

Off C.G. Road, Navrangpura,

Ahmedabad – 380009,

Gujarat, India.

Dear Sir/ Madam,

**Sub.: Request for reclassification from 'promoter group' category to 'public' category in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations")**

We, Arvind Farms Pvt Ltd, are a shareholder of Arvind SmartSpaces Limited ("Company" or "ASL") holding 1,42,011 equity shares of face value of Rs. 10/- each constituting 0.40% of total equity share capital of the Company. We are disclosed as a part of members of promoter group of the Company in the shareholding pattern filed by the Company with the BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE") (together, "Stock Exchanges") in accordance with the SEBI LODR Regulations. As on date, we are not holding any equity shares of the Company.

As on today, except for our shareholding in the Company, we are not, directly or indirectly, associated with the business of the Company and do not have any influence over the business and policy decisions made by the Company. Further, we are not involved in the day to day activities of the Company nor are we exercising any control over the affairs of the Company. Accordingly, we wish to reclassify ourselves from the 'promoter group' category to 'public' category of shareholder of the Company.

In connection with our request for reclassification, we hereby confirm and certify that –

21. We, along with the person related to us (as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018) –

- jj. do not, together, hold more than 10% (ten percent) of the total voting rights in the Company;
- kk. do not exercise control over the affairs of the Company, directly or indirectly;
- ll. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- mm. are not represented on the board of directors of the Company (including through nominee director);
- nn. are not acting as a key managerial person in the Company;



**Arvind Farms Pvt. Ltd.**

**"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad - 380009.**

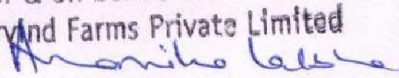
oo. are not 'wilful defaulters' as per the Reserve Bank of India Guidelines; and  
pp. are not fugitive economic offenders.

22. There is no pending regulatory action against us;
23. We shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations at all times from the date of re-classification, failing which, weshall be reclassified as 'promoter group' category shareholders of the Company;
24. We shall comply with the conditions mentioned at sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations for a period of not less than three years from the date of reclassification, failing which, weshall be reclassified as 'promoter group' category shareholders of the Company.

Further, as on date, we, along with the person related to us (*as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018*) do not, together, hold more than 1% (one percent) of the total voting rights in the Company.

In light of foregoing, we request the Board of Directors of the Company to consider and approve our request of reclassification from 'promoter group' category to 'public' category shareholders and make requisite application to the Stock Exchanges in accordance with Regulation 31A of the SEBI LODR Regulations.

Yours faithfully,

**For, Arvind Farms Pvt Ltd**  
For & on behalf of  
**Arvind Farms Private Limited**  
  
**Anantika Lalbhai**  
Anantika Lalbhai / Director



**Samvegbhai Arvindbhai HUF**  
"Akshay", 53, Shrimali Society,  
Navrangpura,  
Ahmedabad – 380009.

28<sup>th</sup> May 2021

To,

**Board of Directors**

**Arvind SmartSpaces Limited**

24, Government Servant's Society,

Nr. Municipal Market,

Off C.G. Road, Navrangpura,

Ahmedabad – 380009,

Gujarat, India.

Dear Sir/ Madam,

**Sub.: Request for reclassification from 'promoter group' category to 'public' category in accordance with Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations")**

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We, Samvegbhai Arvindbhai HUF, are disclosed as a part of members of promoter group of Arvind SmartSpaces Limited ("Company" or "ASL") in the shareholding pattern filed by the Company with the BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE") (together, "Stock Exchanges") in accordance with the SEBI LODR Regulations. As on date, we are not holding any equity shares of the Company.

As on today, we are not, directly or indirectly, associated with the business of the Company and do not have any influence over the business and policy decisions made by the Company. Further, we are not involved in the day to day activities of the Company nor are we exercising any control over the affairs of the Company. Accordingly, we wish to reclassify ourselves from the 'promoter group' category to 'public' category of shareholder of the Company.

In connection with our request for reclassification, we hereby confirm and certify that –

17. We, along with the person related to us (as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018) –
- cc. do not, together, hold more than 10% (ten percent) of the total voting rights in the Company;
  - dd. do not exercise control over the affairs of the Company, directly or indirectly;
  - ee. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
  - ff. are not represented on the board of directors of the Company (including through nominee director);
  - gg. are not acting as a key managerial person in the Company;
  - hh. are not 'wilful defaulters' as per the Reserve Bank of India Guidelines; and
  - ii. are not fugitive economic offenders.



**Samvegbhai Arvindbhai HUF**

**"Akshay", 53, Shrimali Society,**

**Navrangpura,**

**Ahmedabad - 380009.**

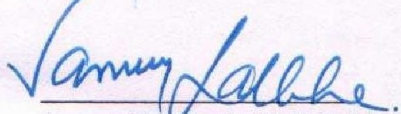
18. There is no pending regulatory action against us;
19. We shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations at all times from the date of reclassification, failing which, weshall be reclassified as 'promoter group' category shareholders of the Company;
20. We shall comply with the conditions mentioned at sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of the SEBI LODR Regulations for a period of not less than three years from the date of reclassification, failing which, weshall be reclassified as 'promoter group' category shareholders of the Company.

Further, as on date, we, along with the person related to us (*as defined under sub-clauses (ii), (iii) and (iv) of clause (pp) of sub-regulation (1) of Regulation 2 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018*) do not, together, hold more than 1% (one percent) of the total voting rights in the Company.

In light of foregoing, we request the Board of Directors of the Company to consider and approve our request of reclassification from 'promoter group' category to 'public' category shareholders and make requisite application to the Stock Exchanges in accordance with Regulation 31A of the SEBI LODR Regulations.

Yours faithfully,

**For, Samvegbhai Arvindbhai HUF**

  
Samvegbhai Arvindbhai Lalbhai