

30<sup>th</sup> October, 2020

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

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

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

**Symbol : ARVSMART**

Dear Sir/Madam,

**Subject: Intimation of receipt of request for reclassification from 'promoter group' category to 'public' category shareholder in accordance with Regulation 30 and 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("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 letter dated 30<sup>th</sup> October 2020 from the following entity requesting its reclassification from 'promoter group' category to 'public' category shareholder 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	AML Employees' Welfare Trust	6,32,731	1.78%

The copy of the request letter is 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.



**AML EMPLOYEES' WELFARE TRUST**  
ARVIND MILLS PREMISES, NARODA ROAD,  
AHMEDABAD – 380 025.

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30<sup>th</sup> October 2020

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 ("SEBI LODR Regulations")**

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We, AML Employee Welfare Trust, are a shareholder of Arvind SmartSpaces Limited ("Company" or "ASL") holding 6,32,731 equity shares of face value of Rs. 10/- each constituting 1.78% 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 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 –

1. 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*) –
  - 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;

## AML EMPLOYEES' WELFARE TRUST

ARVIND MILLS PREMISES, NARODA ROAD,  
AHMEDABAD – 380 025.

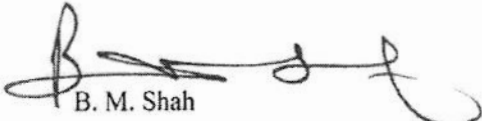
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- f. are not 'wilful defaulters' as per the Reserve Bank of India Guidelines; and
  - g. are not fugitive economic offenders.
2. There is no pending regulatory action against us;
  3. We shall continue to comply with the conditions mentioned at sub-clauses (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;
  4. 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.

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, place the same before the members of the Company and make requisite application to the Stock Exchanges in accordance with Regulation 31A of the SEBI LODR Regulations.

Yours faithfully,

**For, AML Employees' Welfare Trust**

  
B. M. Shah  
Trustee