

April 05, 2021

|                                                                                                                                                                                    |                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>The Manager,<br/>Listing Department,<br/>BSE Limited,<br/>Phiroze Jeejeebhoy Tower,<br/>Dalal Street,<br/>Mumbai 400 001.<br/>Tel no.: 2272 1233<br/>BSE Scrip Code: 540776</b> | <b>The Manager,<br/>Listing Department,<br/>The National Stock Exchange of India Ltd.,<br/>Exchange Plaza, 5 Floor, Plot C/1, G Block,<br/>Bandra - Kurla Complex, Bandra (E),<br/>Mumbai 400 051.<br/>Tel No.: 2659 8235<br/>NSE Symbol: 5PAISA</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Dear Sir/Madam,

**Sub: Disclosure under Regulation 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

With reference to the captioned subject, we enclose herewith the disclosure under Regulation 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in our capacity as promoters of 5paisa Capital Limited for the financial year ended on March 31, 2021.

Kindly take the above on record and oblige.

Thanking you,

Yours Faithfully,

**Nirmal Jain  
(Promoter)  
DIN: 00010535  
5paisa Capital Limited**

**Venkataraman Rajamani  
(Promoter)  
DIN: 00011919  
5paisa Capital Limited**

Copy to:  
Company Secretary  
**5paisa Capital Limited**

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A- Details of Shareholding**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------|---------|------------------------------------------------------------------------|----|------------------------|----|--------------|----|-----------------------|----|---------------------------------------------------------------------------------------|----|------------------|----|------------------------------|----|---------------------------------|
| 1. Name of the Target Company (TC)                                                                                                                                                                                                                                                                                                                                                                                                                                 | Spaisa Capital Limited                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
| 2. Name(s) of the stock exchange(s) where the shares of the TC are listed                                                                                                                                                                                                                                                                                                                                                                                          | National Stock Exchange of India Limited<br>&<br>BSE Limited                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
| <p>3. Particulars of the shareholder(s) :</p> <p>a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.</p> <p align="center">Or</p> <p>b. Name(s) of promoter(s), member of the promoter group and PAC with him.</p> | <p align="center">N.A.</p> <table border="1"> <tr> <td>Sr. No.</td><td>Name(s) of promoter(s), member of the promoter group and PAC with him.</td></tr> <tr> <td>1.</td><td>Nirmal Bhanwarlal Jain</td></tr> <tr> <td>2.</td><td>Madhu N Jain</td></tr> <tr> <td>3.</td><td>Venkataraman Rajamani</td></tr> <tr> <td>4.</td><td>Aditi Avinash Athavankar (in her capacity as a trustee of Kalki Family Private Trust)</td></tr> <tr> <td>5.</td><td>Aditi Athavankar</td></tr> <tr> <td>6.</td><td>Ardent Impex Private Limited</td></tr> <tr> <td>7.</td><td>Orpheus Trading Private Limited</td></tr> </table> |                                                          |                                                   | Sr. No. | Name(s) of promoter(s), member of the promoter group and PAC with him. | 1. | Nirmal Bhanwarlal Jain | 2. | Madhu N Jain | 3. | Venkataraman Rajamani | 4. | Aditi Avinash Athavankar (in her capacity as a trustee of Kalki Family Private Trust) | 5. | Aditi Athavankar | 6. | Ardent Impex Private Limited | 7. | Orpheus Trading Private Limited |
| Sr. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Name(s) of promoter(s), member of the promoter group and PAC with him.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
| 1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Nirmal Bhanwarlal Jain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
| 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Madhu N Jain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
| 3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Venkataraman Rajamani                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
| 4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Aditi Avinash Athavankar (in her capacity as a trustee of Kalki Family Private Trust)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
| 5.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Aditi Athavankar                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
| 6.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Ardent Impex Private Limited                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
| 7.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Orpheus Trading Private Limited                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                          |                                                   |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |
| 4. Particulars of the shareholding of person(s) mentioned at (3) above                                                                                                                                                                                                                                                                                                                                                                                             | Number of shares                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | % w.r.t. total share /voting capital wherever applicable | % of total diluted share/voting capital of TC (*) |         |                                                                        |    |                        |    |              |    |                       |    |                                                                                       |    |                  |    |                              |    |                                 |

|                                                                                          |         |         |         |
|------------------------------------------------------------------------------------------|---------|---------|---------|
| As of March 31 <sup>st</sup> of the year 2021, holding of:                               |         |         |         |
| a) Shares                                                                                |         |         |         |
| 1. Nirmal Bhanwarlal Jain                                                                | 5600088 | 21.9474 | 21.9474 |
| 2. Madhu N Jain                                                                          | 1365016 | 5.3497  | 5.3497  |
| 3. Venkataraman Rajamani                                                                 | 949594  | 3.7216  | 3.7216  |
| 4. Aditi Avinash Athavankar (in her capacity as a trustee of Kalki Family Private Trust) | 720000  | 2.8218  | 2.8218  |
| 5. Aditi Athavankar                                                                      | 16000   | 0.0627  | 0.0627  |
| 6. Ardent Impex Private Limited                                                          | 108000  | 0.4233  | 0.4233  |
| 7. Orpheus Trading Private Limited                                                       | 52000   | 0.2038  | 0.2038  |
| b) Voting Rights (otherwise than by shares)                                              | NIL     | NIL     | NIL     |
| c) Warrants,                                                                             | NIL     | NIL     | NIL     |
| d) Convertible Securities                                                                | NIL     | NIL     | NIL     |
| e) Any other instrument that would entitle the holder to receive shares in the TC.       | NIL     | NIL     | NIL     |
| Total                                                                                    | 8810698 | 34.5302 | 34.5302 |

**Nirmal Jain**  
**DIN: 00010535**  
**(Promoter)**  
**Spaisa Capital Limited**

**Venkataraman Rajamani**  
**DIN: 00011919**  
**(Promoter)**  
**Spaisa Capital Limited**

Place: Mumbai  
 Date: April 05, 2021

**Part-B\*\***

Name of the Target Company: **Spaisa Capital Limited**

| <b>Sr. No.</b> | <b>Name(s) of the person and Persons Acting in Concert (PAC) with the person</b>      | <b>Whether the person belongs to Promoter/ Promoter group</b> |
|----------------|---------------------------------------------------------------------------------------|---------------------------------------------------------------|
| 1.             | Nirmal Bhanwarlal Jain                                                                | Yes                                                           |
| 2.             | Madhu N Jain                                                                          | Yes                                                           |
| 3.             | Venkataraman Rajamani                                                                 | Yes                                                           |
| 4.             | Aditi Avinash Athavankar (in her capacity as a trustee of Kalki Family Private Trust) | Yes                                                           |
| 5.             | Aditi Athavankar                                                                      | Yes                                                           |
| 6.             | Ardent Impex Private Limited                                                          | Yes                                                           |
| 7.             | Orpheus Trading Private Limited                                                       | Yes                                                           |

**Nirmal Jain**  
**DIN: 00010535**  
**(Promoter)**  
**Spaisa Capital Limited**  
Place: Mumbai

**Venkataraman Rajamani**  
**DIN: 00011919**  
**(Promoter)**  
**Spaisa Capital Limited**

Date: April 05, 2021

**Note:**

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

(\*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

(\*\*) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.

April 05, 2021

|                                                                                                                                                                                    |                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>The Manager,<br/>Listing Department,<br/>BSE Limited,<br/>Phiroze Jeejeebhoy Tower,<br/>Dalal Street,<br/>Mumbai 400 001.<br/>Tel no.: 2272 1233<br/>BSE Scrip Code: 540776</b> | <b>The Manager,<br/>Listing Department,<br/>The National Stock Exchange of India Ltd.,<br/>Exchange Plaza, 5 Floor, Plot C/1, G Block,<br/>Bandra - Kurla Complex, Bandra (E),<br/>Mumbai 400 051.<br/>Tel No.: 2659 8235<br/>NSE Symbol: 5PAISA</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Dear Sir/Madam,

**Sub: Disclosure under Regulation 31(4) and 31(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

Pursuant to the provisions of Regulation 31(4) and 31(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, we, Nirmal Bhanwarlal Jain and Venkataraman Rajamani, Promoters of Spaisa Capital Limited do hereby confirm below, for and on behalf of Promoters, Members of the Promoter Group along with Persons Acting in Concert that:

The Promoters / Promoter Group Members along with Persons Acting in Concert of Spaisa Capital Limited have not made any encumbrance in respect of their shareholding in Spaisa Capital Limited, directly or indirectly during the financial year ended March 31, 2021.

Kindly take the above on record and oblige.

Thanking you,

Yours Faithfully,

**Nirmal Jain  
(Promoter)  
DIN: 00010535  
Spaisa Capital Limited**

**Venkataraman Rajamani  
(Promoter)  
DIN: 00011919  
Spaisa Capital Limited**

Copy to:  
The Audit Committee  
**Spaisa Capital Limited**

| Name(s) of promoter(s), member of the promoter group and PAC with him                    | Number of Shares | % w.r.t. total share /voting capital wherever Applicable | % of total diluted share/voting capital of TC (*) |
|------------------------------------------------------------------------------------------|------------------|----------------------------------------------------------|---------------------------------------------------|
| Nirmal Bhanwarlal Jain                                                                   | 5600088          | 21.9474                                                  | 21.9474                                           |
| Madhu N Jain                                                                             | 1365016          | 5.3497                                                   | 5.3497                                            |
| Venkataraman Rajamani                                                                    | 949594           | 3.7216                                                   | 3.7216                                            |
| Aditi Avinash Athavankar<br>(in her capacity as a trustee of Kalki Family Private Trust) | 720000           | 2.8218                                                   | 2.8218                                            |
| Aditi Athavankar                                                                         | 16000            | 0.0627                                                   | 0.0627                                            |
| Ardent Impex Private Limited                                                             | 108000           | 0.4233                                                   | 0.4233                                            |
| Orpheus Trading Private Limited                                                          | 52000            | 0.2038                                                   | 0.2038                                            |
| Total                                                                                    | 8810698          | 34.5302                                                  | 34.5302                                           |

**Nirmal Jain**  
**DIN: 00010535**  
**(Promoter)**  
**Spaisa Capital Limited**

**Venkataraman Rajamani**  
**DIN: 00011919**  
**(Promoter)**  
**Spaisa Capital Limited**

Place: Mumbai  
 Date: April 05, 2021