

10<sup>th</sup> June, 2025

**National Stock Exchange**

Exchange Plaza  
Plot No. C/1, G Block,  
Bandra – Kurla Complex,  
Bandra (E), Mumbai – 400051

**(NSE Scrip Code: SPMLINFRA)**

**BSE Limited**

PhirozeJeejeebhoy Tower  
Dalal Street,  
Mumbai – 400 001

**(BSE Scrip Code: 500402)**

**Sub: Disclosure to the Stock Exchanges for Creation of encumbrance over the shares in terms of Regulation 31(2) and 31(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir,

Pursuant to Regulation 31(2) and 31(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, we are in receipt of the disclosure from Niral Enterprises Pvt. Ltd dated 10<sup>th</sup> June, 2025, subsequent to the creation of the encumbrance over the shares of the Company has held by them in favour of SBICAP Trustee Company Ltd.

Kindly take the above on record.

Thanking you,  
**For SPML Infra Limited**

Swati  
Agarwal

Digitally signed  
by Swati Agarwal  
Date: 2025.06.10  
11:32:37 +05'30'

**Swati Agarwal  
Company Secretary**

Encl.: As Above.

10<sup>th</sup> June, 2025

**National Stock Exchange**

Exchange Plaza  
Plot No. C/1. G Block,  
Bandra – Kurla Complex,  
Bandra (E), Mumbai – 400051

**BSE Limited**

PhirozeJeejeebhoy Tower  
Dalal Street,  
Mumbai – 400 001

**SPML Infra Limited**

F – 27/2, Okhla Industrial  
Area, Phase II,  
New Delhi - 110020

**(NSE Scrip Code: SPMLINFRA)**

**(BSE Scrip Code: 500402)**

**Sub: Disclosure to the Stock Exchanges and to the Target Company for creation of pledge over the shares of SPML Infra Ltd in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir,

Pursuant to Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, please find enclosed herewith disclosure subsequent to the creation of pledge over the shares of SPML Infra Limited as held by us in the capacity of the Promoter in favor of SBICAP Trustee Company Ltd on behalf of National Asset Reconstruction Company Ltd ("The Lender").

Kindly take the above on record.

Thanking you,

**For and on behalf of Promoter Group  
Niral Enterprises Pvt Ltd**



**Manoj Kumar Gangwal  
Director  
Din:06659068**

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

| Regulation 31(1) and 31(2) or 31(3) Substantial Acquisition of Shares and Takeovers Regulations, 2002 |                                            |                          |                                    |                                         |                          |                                                 |                                                        |                                                                    |                                                                                     |               |                          |                                                           |         |                                                                                                    |
|-------------------------------------------------------------------------------------------------------|--------------------------------------------|--------------------------|------------------------------------|-----------------------------------------|--------------------------|-------------------------------------------------|--------------------------------------------------------|--------------------------------------------------------------------|-------------------------------------------------------------------------------------|---------------|--------------------------|-----------------------------------------------------------|---------|----------------------------------------------------------------------------------------------------|
| 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                                                                                     |                                            |                          |                                    |                                         |                          | 10.06.2025                                      |                                                        |                                                                    |                                                                                     |               |                          |                                                           |         |                                                                                                    |
| Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked             |                                            |                          |                                    |                                         |                          | Niral Enterprises Pvt. Ltd                      |                                                        |                                                                    |                                                                                     |               |                          |                                                           |         |                                                                                                    |
| Details of the creation/invocation/release of encumbrance:                                            |                                            |                          |                                    |                                         |                          | Creation                                        |                                                        |                                                                    |                                                                                     |               |                          |                                                           |         |                                                                                                    |
| 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 undertaken g/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 (***) |         |                                                                                                    |
| SUBHASH CHAND SETHI                                                                                   | 1703745                                    | 2.38                     | 2.06                               | 1523280                                 | 2.13                     | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | 1523280 | 2.14                                                                                               |
| SUSHIL KUMAR SETHI                                                                                    | 1345276                                    | 1.88                     | 1.63                               | 1334660                                 | 1.88                     | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | 1334660 | 1.88                                                                                               |
| PUNAM CHAND SETHI (HUF)                                                                               | 494625                                     | 0.69                     | 0.60                               | -                                       | -                        | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | -       | -                                                                                                  |
| PUNAM CHAND SETHI                                                                                     | 372735                                     | 0.52                     | 0.45                               | -                                       | -                        | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | -       | -                                                                                                  |
| SUMAN SETHI                                                                                           | 183735                                     | 0.26                     | 0.22                               | 183735                                  | 0.26                     | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | 183735  | 0.26                                                                                               |
| SANDHYA RANI SETHI                                                                                    | -                                          | -                        | -                                  | -                                       | -                        | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | -       | -                                                                                                  |
| SUBHASH CHAND SETHI (HUF)                                                                             | -                                          | -                        | -                                  | -                                       | -                        | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | -       | -                                                                                                  |
| SUSHIL KUMAR SETHI (HUF)                                                                              | -                                          | -                        | -                                  | -                                       | -                        | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | -       | -                                                                                                  |
| ZOOM INDUSTRIAL SERVICES LTD                                                                          | 12937499                                   | 18.09                    | 17.67                              | -                                       | -                        | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | -       | -                                                                                                  |
| 20TH CENTURY ENGINEERING LTD                                                                          | 1000000                                    | 1.40                     | 1.21                               | -                                       | -                        | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | -       | -                                                                                                  |
| ARIHANT LEASING AND HOLDING LIMITED                                                                   | 436020                                     | 0.61                     | 0.53                               | -                                       | -                        | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | 436020  | 0.61                                                                                               |
| SPML INDIA LIMITED                                                                                    | 4074338                                    | 5.70                     | 8.05                               | 1780500                                 | 2.49                     | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | 1780500 | 2.50                                                                                               |
| NIRAL ENTERPRISES PVT LTD                                                                             | 2630553                                    | 3.68                     | 9.20                               | 1481739                                 | 2.07                     | Creation                                        | 09.06.2025                                             | Pledge                                                             | Pledge as per the MRA Agreement dated 17.05.2024 executed with NARCL ("The Lender") | 60729         | 0.08                     | NARCL/SBICAP Trustee Co. Ltd                              | 1542468 | 2.16                                                                                               |
| BHARAT HYDRO POWER CORPORATION LIMITED                                                                | -                                          | -                        | -                                  | -                                       | -                        | -                                               | -                                                      | -                                                                  | -                                                                                   | -             | -                        | -                                                         | -       | -                                                                                                  |

On Behalf of Promoter Group  
Niral Enterprises Pvt Ltd

Manoj Kumar Gangwal  
Director  
Din: 06659068



Place: Delhi  
Date: 10.06.2025