SHANTABEN V. PATEL

11, Hindu Colony, Opp. Sardar Patel Stadium, Navrangpura, Ahmedabad-380 009 Gujarat

Date: 01/04/2024

To,

The Manager (Listing)

Corporate Relationship Dept.

BSE Limited

P J Tower,

Dalal Street,

Mumbai - 400 001

The Manager (Listing)

National Stock Exchange of India Limited

"Exchange Plaza",

Plot No C/1, G Block

Bandra Kurla Complex, Bandra (E)

Mumbai - 400 051

NSE Symbol: SADBHAV (NSE)

Company Code: 532710 (BSE)

Dear Sir/ Madam,

Sub: Disclosure in terms of Regulation 31(1) read with Regulation 28(3) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Pursuant to the SEBI Circular SEBI/HO/CFD/DCR1/CIR/P2019/90 dated August 07,2019, please find attached herewith disclosure about the detailed reasons for encumbrance by the promoter i.e. Shantaben V. Patel in the terms of Regulation 31(1) read with Regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge the documents.

Thanking You,

Yours faithfully,

Shantaben V. Patel

Promoter

CC:

To,

Compliance Officer

Sadbhav Engineering Limited

Address: Sadbhav House, Opp. Law Garden Police Chowki,

Ellisbridge, Ahmedabad - 380006, Gujarat.

Annexure II

Disclosure of reasons for encumbrance

Instrument

3. Whether the debt instrument is fisted on stock exchanges?

4. Credit Rating of the debt instrument
S. ISIN of the Instrument

Security Cover / Asset Value of shares on the date of event / agreement (A) Cover

Amount involved (against which shares have been encumbered) (B) Ratio of A / B

Value based on closing price of either MSE or BSE as on date of pledge.

Rs. 20,00,00,000/-

ame of listed company	Sadbhav Engineering Limited					
erne or natice company	BSE Limited	ig annice		1		
and the state of t	National Stock Exchange of I	ndia Limited				
ame of the recognised stock exchanges where the shares of the company are listed	Mr. Shantaben V. Patel	inter tilliter				
ame of the promoter(s) / PACs whose shares have been encumbered	No. of shares	8.01.94.394				
otal promoter shareholding in the listed company				1		
	% of total share capital	46.74% of total share capital	,	-		
ncumbered shares as a % of promoter shareholding	78,61%		.	-		
Whether encumbered share is 50% or more of promoter shareholding	YES					
Vhether encumbered share is 20% or more of total share capital	YES]		
letails of all the existing events/ agreements pertaining to encumbrance						
		Encumbrance 1		Encumbrance 3	Encumbrance 4	
		(Date of creation of encumbrance:	Encumbrance 2	(Date of creation of encumbrance: 29.01,2019 &	(Date of creation of encumbrance:	
		07.02.2019 & Additional	(Date of creation of encumbrance: 07.02.2019	Additional encumbrance: 14.02.2019,31.07.2019,	29.03.2019 & Additional	Encumbrance 5
		encumbrance: 04.04,2019,	& Additional encumbrance:	01.08.2019, 23.01.2020,	encumbrance:	(Date of creation of encumbran
	!	19.07.2019,01.08.2019,20.01.2020,	18.06.2019,17.07.2019,23.07.2019,25.07.2020,	24.01.2020,04.02.2020,14.02.2020,	04.04.2019,11.07.2019, 19.07.2019,	29.01.2020 & Additional encumbra
		19.02.2020, 09.03.2020,	08.08.2019,06.02,2020, 27.02.2020 &	18.02.2020,19.02.2020,03.03.2020,	05,08.2019, ,20.02.2020,09.03,2020,	04.02.2020,13.02.2020, 26.02.20
		11,03,2020,20.03.2020, 03.04.2020	02.03.2020,09.03.2020,11.03.2020)	09.03.2020,11.03.2020,18.03.2020)	22,05,2020, 27.05,2020)	03.03.2020,09.03.2020, 20.03.20
The second secon		Pledge	Pledge		Pledge	Pledge
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant transaction, condition or arrangement in the nature of encumbrance)	1	T TEURS	· · · · · · · · · · · · · · · · · · ·			
o, and % of shares encumbered	No. of shares	276664 (dated 07.02.2019)	1454314 (dated 07.02.2019)	1441627 (dated 25.01.2019)	1125000 (dated 29.03.2019)	3800000 (dated 29.01.2020)
	% of total share capital	0.16% of rotal share capital	0.85% of total share capital	0.84% of total share capital	0.65% of total share capital	2.21% of total share capital
	No, of shares	375336 (dated 04.04.2019)	1450109 (Released date 18.06.2019)	153373 (dated 14.02.2019)	750000 (dated 04.04.2019)	195000 (dated 04.02.2020)
<u> </u>	% of total share capital	0.22% of total share capital	0.84% of total share capital	0.08% of total share capital	0,43% of total share capital	0.11% of total share capital
	No. of shares	500000 (dated 19,07,2019)	157200 (dated 17.07.2019)	185000 (dated 31.07.2019)	75536 (dated 11.07.2019)	1200000 (dated 13.02.2020)
<u>. </u>	% of total share capital	0.29% of total share capital	0.09% of total share capital	0,11% of total share capital	0.04% of total share capital	0.70% of total share capital
<u> </u>	No. of shares	1136350 (dated 01.08.2019)	14205 (Released date 23.07.2019)	540000 (dated 01,08.2019)	393214 (dated 19.07.2019)	1500000 (dated 25,02.2020)
	% of total share capital	0.66% of total share capital	0.008% of total share capital	0.31% of total share capital	0.22% of total share capital	0.87% of total share capital
	No, of shares	953500 (dated 20.01.2020)	230000 (dated 25,07,2019)	2712500 (dated 21,01,2020)	781250 (dated 05.08.2019)	400000 (dated 03.03.2020)
	% of total share capital	0,55% of total share capital	0.13% of total share capital	1.58% of total share capital	0.45% of total share capital	0.23% of total share capital
		700000 (dated 19,02,2020)	857000 (dated 08:08:2019)	2320000 (Released date 24.01.2020)	334745 (dated 20,02,2020)	2100000 (dated 09.03.2020)
	No. of shares	0.40% of total share capital	0.50% of total share capital	1.35% of total share capital	0.19% of total share capital	1.22% of total share capital
	% of total share capital	600000 (dated 09.03.2020)	511000 (Released date 06.02.2020)	400000 (dated 04.02.2020)	467202 (dated 09.03.2020)	1075270 (dated 20,03,2020)
	No. of shares		0.30% of total share capital	0.23% of total share capital	0.27% of total share capital	0.63% of total share capital
	% of total share capital	0.35% of total share capital				6500000 (dated 30.03.2021)
	No. of shares	1111944 (dated 11.03.2020)	534141 (dated 27.02.2019)	313000 (dated 14.02.2020)	1000000 (dated 22.05.2020)	
	% of total share capital	0.65% of total share capital	0.31% of total shere capital	0.18% of total share capital	0.58% of total share capital	3.79% of total share capital
	No. of shares	1109594 (dated 11.03.2020)	389179 (dated 02.03.2019)	450000 (dated 18.02.2020)	500000 (dated 27.05.2020)	
	% of total share capital	0.65% of total share capital	0.23% of total share capital	0.26% of total share capital	0.58% of total share capital	
	No. of shares	958611 (dated 20.03.2020)	531609 (dated 09.03.2019)	774500 (dated 19.02.2020)		
	% of total share capital	0.55% of total share capital	0.31% of total share capital	0.45% of total share capital		
	No. of shares	963311 (dated 20.03.2020)	767878(dated 11.03.2019)	775000 (dated 03.03.2020)		
	% of total share capital	0.56% of total share capital	0.44% of total share capital	D,45% of total share capital		
	No. of shares	750000 (dated 03.04.2020)	I	493182 (dated 09.09.2020)		
	% of total share capital	0.44% of total share capital		0.29% of total share capital		
· · · · · · · · · · · · · · · · · · ·	No. of shares			1315151 (dated 11,03,2020)		
	% of total share capital			0.77% of total share capital		
	No. of shares			1000000 (dated 18.03.2020)		
	% of total share capital	1		0,58% of total share capital		
	Total No. of Shares Pledged	9435910	2956007	8233333	5426947	16770270
	as on 30.03.2021 Total % of Shares	5,50%	1.72%	4.80%	3.16%	9.77%
	encumbered as on date					
Specific details about Name of the entity in whose favour shares encumbered (X)	50.03.2021	Aditya Birla Finance Ltd.	Axis Finance Ltd.	Tata Capital Financial Services Ltd.	ABL Bank Ltd.	STCI Finance Ltd.
the encumbrance	VEC / NO	Var	Yes	Yes	Yes	Yes
Whether the entity X is a scheduled commercial bank, public financial institution, NBEC or housing finance company? If No, provide the nature of the business of the entity.		Yes	165	Lid		
Names of all other entitles in the agreement		Listed company and its group	Listed company and its group companies (if	Listed company and its group companies (if any) -	Listed company and its group	Listed company and its group
Mattheway on a men anima and an all agriculture	1	companies (if any) -	any) -	1. Tata Financial Services Ltd.	companies (if any) -	companies (if any) -
	1	1. Aditya Birla Finance Ltd.	1. Axis Finance Ltd.		1, RBL Bank Ltd.	1. STCI Finance Ltd.
	l			Other entitles (if	1	1
		Other entities (if any)	Other entities (If any)		Other entities (If	Other entities (If
İ	1	1. Mr. Vikram R. Patel	1. Mr. Vikram R. Patel		1. Mr. Shashin V. Patel	1, Sadbhav Engineering Limited
1		2. Mr. Vasistha C. Patel	A THE COMMENT OF PRINCE		2. Mr. Víkram R. Patel	
		Z. W.F. Vasistria C. Patel			3,Mr. Vasistha C. Patel	
	1	1 .			January designation of the control o	
Whether the encumbrance is relating to any debt instruments viz. debenture,	YES / NO (If Yes,)	No	No	No	No	No
Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the		No	No	No -	No -	No -
Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating	YES / NO (If Yes,) 1, Name of Issuer 2, Details of the debt	No -	No -	No -	No -	No -

Rs. 27,37,53,502/-(as on 07.02.2019)

Rs. 6,03,00,000/-4,54

Rs. 18,46,72,419/-[as on 29.01.2019]

Rs. 10,85,00,000/-

Rs.23,00,00,000/-

Rs. 27,95,06,250/-(as on 29.03.2019) Rs. 48,67,80,000/-(as on 29.01,2020)

Rs.25,00,00,000

Value	e of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of pledge.	Rs, 9,18,25,953/- (as an 04.04.2019)	Rs. 37,49,25,682/-(Released as on 18.06.2019)	103. \$20.85(\$28)~(63.00) TH/DE/SO12)	Rs. 18,34,87,500/-(as an 04.04.2019)	
	ount involved (against which shares have been encumbered) (B)	_	Rs. 20,00,00,000/-	Rs. 5.03.00.000/-	Rs. 10,85,00,000/-	Rs.25,00,00,000	Rs. 23,00,00,000/-
	p of A / B		0.46	6.21	0.23		0.09
	e of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of pledge.	Rs. 8,96,25,000/-(as on 19.07.2019)	Rs. 2,92,23,480/-(as on 17.07.2019)	Rs. 2,59,92,500/-(as on 31.07.2019)		Rs. 12,96,00,000/-(as on 12.02.202
Amo	ount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs, 6,03,00,000/-	Rs. 10,85,00,000/-		Rs.23,00,00,000/-
	a of A /B		0.45	0.48	0,24		0,56
	e of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of pledge.	Rs. 15,04,52,740-(as on 01.08.2019)	Rs. 23,98,514/-{Released as on 23.07.2019}	Rs. 7,14,95,000/-{ as on 01.08.2019)	Rs. 7,04,83,609/-(as on 19.07.2019)	Rs. 11,85,75,000/-{ as on 26.02.20
-			Rs. 20,00,00,000/-	Rs. 14,67,00,000/-	Rs. 10.85.00.000/-	Rs.25,00,00,000	Rs.23,00,00,000/-
	ount involved (against which shares have been encumbered) (B)	ļ. -	0.75	0.016	0.66	0.28	0.51
	o of A / B Je of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of pledge.	Rs. 13,22,50,450/-(as on 20.01.2020)	Rs. 3,80,30,500/-(as on 25.07.2019)	Rs. 36,17,11,875/-{as on 23,01,2020}	Rs. 9,55,46,875/-{as on 05.08.2019}	Rs. 2,59,40,000/-(as on 03.03.20
A	ount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs. 14,67,00,000/-	Rs. 10,85,00,000/-		Rs.23,00,00,000/-
	to of A / B	 	0.66	0.26	3.35		0.11
	ue of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of pledge.	Rs. 5,70,50,000/-(as on 19.02.2020)	Rs. 11,10,67,200/-(as on GE.OB,2019)	Rs. 31,14,60,000/-(Released as on 24.01.2020)		Rs, 10,98,30,000/-(as on 09.03.20)
0.004	ount Involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs, 14,67,00,000/-	Rs. 10,85,00,000/-	Rs.25,00,00,000	Rs.23,00,00,000/~
	io of A / B	-	0.28	0.07	2.87	0.11	0.47
	ue of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of piedge.	Rs.31380000/-(as on 09.03.2020)	Rs. 7,00,16,500/-(Released as on 06,02,2020)	Rs. 4,64,20,000/-(as on 04.02.2020)	Rs. 2,44,34,665/-(as an 09.03.2020)	Rs. 1,68,81,739/-(as on 20.03.20)
Am	ount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs. 12,67,00,000/-	Rs, 10,85,00,000/-		Rs.19,00,00,000/-
	io of A / B		0.15	0.55	0.43	0.10	0.09
	ue of shares on the date of event / agreement (A)		Rs,56208769/-(as on 11,03.2020)	Rs. 4,07,01,544/-(as on 27.02.2020)	Rs. 3,12,21,750/-{as on 14.02.2020}		Rs. 40,85,25,000/-{as on 30,03,20
Am	ount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs. 12,67,00,000/-	Rs. 10,85,00,000/-	Rs.25,00,00,000	Rs.50,00,00,000/-
	io of A / B		0.28	0,32	0.29	D.16	0.82
	ue of shares on the date of event / agreement (A)		Rs,550E9977/-(as on 11.03.2020)	Rs. 2,63,27,959/-(as on 02.03.2020)	Rs. 4,03,42,500/-(as on 18.02.2020)	Rs. 1.98,25,000/- (As on 27.05,2020)	
	ount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs. 12,67,00,000/-	Rs. 10,E5,00,000/-	Rs.25,00,00,000	
	tio of A / 8		0.28	0.21	0.37	0.08	
	Let of shares on the date of event / agreement (A)		Rs,14666748/-(as on 20.03.2020)	Rs. 2,78,03,150/-(as on 09.03.2020)	Rs. 6,31,21,750/-(as on 19.02.2020)		
	nount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs. 12,67,00,000/-	Rs. 10,85,00,000/-		
	tio of A / B		0,07	0.22	0.58		<u> </u>
	lue of shares on the date of event / agreement (A)		Rs.14738658/-(as on 20.03.2020)	Rs. 3,68,16,233/-(as on 11.03.2020)	Rs. 5,32,34,750/-(as on 03,03,2020)		
	nount involved (against which shares have been encumbered) (5)		Rs. 20,00,00,000/-	Hs. 12,67.00,000/-	As. 10,85,00,000/-		
	tio of A / B		0,07	0.31	0.49		
	lue of shares on the date of event / agreement (A)		Rs.19072500/-(as on 03.04.2020)		Rs. 2,57,93,418/-(as.on 09.03,2020)		<u> </u>
	nount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	<u> </u>	Rs. 10,85,00,000/-		
	tie of A / B	1 - 1	0.09	<u> </u>	0.23		
	ue of shares on the date of event / agreement (A)		<u> </u>	<u>.</u>	Rs. 6,64,80,883/-(as on 11.03.2020)	_	ļ
	nount involved (against which shares have been encumbered) (B)		.		Rs. 10,85,00,000/-		
	tio of A / B				0,61		
Va	lue of shares on the date of event / agreement (A)		<u> </u>		Rs. 1,54,50,000/-(as on 18.03.2020)		ļ
	nount involved (against which shares have been encumbered) (B)		 	 	Rs. 10,85,00,000/-		+
Ra	tic of A / B	·			0.14		
			+	 	+	-	<u> </u>
	rrowed amount to be utilized for what purpose ~	+	IND.	No	Yes	No	No
	Personal use by promoters and PACs	+	No	No.	No	No	Yes
Provide det schedule fo) For the benefit of listed company ovide details including amount, purpose of raising money by listed company,		As per Sanction Letter of third party	As per Sanction Letter of third party	As per Sanction Letter	As per Sanction Letter of third party	As per Sanction Letter
	hedule for <u>utilization of amount, repayment schedule etc.</u> Any other reason (please specify)		Security for third party	Security for third party	Personal Use	Security for third party	Borrowing by Sadbhav Engine Limited and piedge of Equity sh Sadbhav Engineering Ltd. as a Sanction Letter.

Date: O1_r01_r2021 Place: Ahmedabad

S-V-latel
Shantaben V. Patel
Promoter of the Company

SHASHIN V. PATEL

11, Hindu Colony, Opp. Sardar Patel Stadium, Navrangpura, Ahmedabad-380 009 Gujarat

Date: 01/04/2021

To,

The Manager (Listing)

Corporate Relationship Dept.

BSE Limited

P I Tower,

Dalal Street,

Mumbai - 400 001

Company Code: 532710 (BSE)

The Manager (Listing)

National Stock Exchange of India Limited

"Exchange Plaza",

Plot No C/1, G Block

Bandra Kurla Complex, Bandra (E)

Mumbai - 400 051

NSE Symbol: SADBHAV (NSE)

Dear Sir/ Madam,

Sub: Disclosure in terms of Regulation 31(1) read with Regulation 28(3) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Pursuant to the SEBI Circular SEBI/HO/CFD/DCR1/CIR/P2019/90 dated August 07,2019, please find attached herewith disclosure about the detailed reasons for encumbrance by the promoter group i.e. Mr. Shashin V. Patel in the terms of Regulation 31(1) read with Regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge the documents.

Thanking You,

Yours faithfully,

Shashin V. Patel

Promoter Group

CC:

To,

Compliance Officer

Sadbhav Engineering Limited

Address: Sadbhav House, Opp. Law Garden Police Chowki,

Ellisbridge, Ahmedabad - 380006, Gujarat.



Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular dated August 05, 2015)

Name of listed company	Sadbhav Engineering Limited			
	BSE Limited	•		
Name of the recognised stock exchanges where the shares of the company are listed	National Stock Exchange of India Limited Mr. Shashin V. Patel			
Name of the promoter(s) / PACs whose shares have been encumbered				
Total promoter shareholding in the listed company	No. of shares	8,01,94,394		
Total promote and an analysis are prompting	% of total share capital	46.74% of total share capital		
Encumbered shares as a % of promoter shareholding	78.61%			
Whether encumbered share is 50% or more of promoter shareholding	YES			
Whether encumbered share is 20% or more of total share capital	YES	<u> </u>		

veralls of all the ex	isting events/ agreements pertaining to encumbrance			
			Encumbrance 1 {Date of creation of encumbrance: 19.11.2019, Additional encumbrance: 14.02.2020, 20.02.2020, 28.02.2020, 09.03.2020}	Encumbrance 2 (Date of creation of encumbrance: 14.09.2020
pe of encumbrance (ansaction, condition	pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, or arrangement in the nature of encumbrance)		Pledge	Pledge
o. and % of shares en	cumbered	No. of shares % of total share capital	2,84,090 0.16% of total share capital	31,83,333 1.85% of total share capital
		No. of shares	1,95,000	
		% of total share capital	0.11% of total share capital	
			3,76,527	
		% of total share capital	0.22% of total share capital	
<u> </u>		No. of shares	1,29,000	
		% of total share capital	0.08% of total share capital	
		No. of shares	5,25,666	
		% of total share capital	0.31% of total share capital	
·		Total No. of Shares encumbered as on date 30.03.2021	15,10,283	31,83,333
		Total % of Shares encumbered as on date 30.3.2021	0.88%	1.85%
the encumbrance	Name of the entity in whose favour shares encumbered (X)		RBL Bank Ltd.	Gayi Adi Management And Trends Private Limited
	Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.	YES / NO	Yes	Yes
	Names of all other entities in the agreement		Listed company and its group companies (if any) - 1. RBL Bank Ltd.	Listed company and its group companies (if any) - 1. Gayi Adi Management And Trends Private Ltd.
			Other entities (if any) 1. Mr. Shashin V. Patel	Other entities (if any) 1. Mr. Shashin V. Patel



	Whether the encumbrance is relating to any debt instruments viz. debenture,	YES / NO (if Yes,)	No	No
	commercial paper, certificate of deposit etc.? If yes, provide details about the	1. Name of Issuer	-	-
	instrument, including credit rating	2. Details of the debt instrument	-	-
		3. Whether the debt instrument is listed on	-	-
		stock exchanges?		·
		4. Credit Rating of the debt instrument	-	-
		5. ISIN of the instrument	-	
•	Value of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of pledge.	Rs. 3,46,73,184.5 (As on 19.11.2019)	Rs. 16,96,71,649(As on 14.09.2020
Cover	Amount involved (against which shares have been encumbered) (B)	or bac as on date of predge.	Rs. 9,00,00,000/-	Rs. 6,00,00,000/-
	Ratio of A / B		0.39	2.82
	Value of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of pledge.	Rs. 1,94,51,250/- (As on 14.02.2020)	
	Amount involved (against which shares have been encumbered) (B)	Of Bac as all agree of bleager	Rs. 9,00,00,000/-	
	Ratio of A / B		0.22	-
	Value of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of pledge.	Rs. 3,11,38,782.9 (As on 20.02.2020)	
	Amount involved (against which shares have been encumbered) (B)	, , , , , , , , , , , , , , , , , , ,	Rs. 9,00,00,000/-	
	Ratio of A / B		0.35	
	Value of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of pledge.	Rs. 90,94,500/- (As on 28.02.2020)	
	Amount involved (against which shares have been encumbered) (B)		Rs. 9,00,00,000/-	
	Ratio of A / B		0.10	
	Value of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date of pledge.	Rs. 2,74,92,332/- (As on 09.03.2020)	
	Amount involved (against which shares have been encumbered) (B)		Rs. 9,00,00,000/-	
	Ratio of A / B		0.31	
End use of money	Borrowed amount to be utilized for what purpose –			
end use of money	(a) Personal use by promoters and PACs		Yes.	Yes.
			Purpose - Repayment of existing debts	Purpose - Repayment of existing debts
	(b) For the benefit of listed company		No	No
	Provide details including amount, purpose of raising money by listed company,	-	-	
}	(a) Any other reason (please specify)	-	No	No

Date: 01.04.2021
Place: Ahmedabad

Shashin V. Patel Promoter Group

VASISTHA C. PATEL

27, Shashwat Bunglows, S.G. Highway, B/h. Rajpath Club, Bodakdev, Ahmedabad - 380059, Gujarat.

Date: 01/04/2027

To,

The Manager (Listing)

Corporate Relationship Dept.

BSE Limited

P | Tower,

Dalal Street,

Mumbai - 400 001

The Manager (Listing)

National Stock Exchange of India Limited

"Exchange Plaza",

Plot No C/1, G Block

Bandra Kurla Complex, Bandra (E)

Mumbai - 400 051

Company Code: 532710 (BSE)

NSE Symbol: SADBHAV (NSE)

Dear Sir/ Madam,

Sub: Disclosure in terms of Regulation 31(1) read with Regulation 28(3) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Pursuant to the SEBI Circular SEBI/HO/CFD/DCR1/CIR/P2019/90 dated August 07,2019, please find attached herewith disclosure about the detailed reasons for encumbrance by the promoter group i.e. Mr. Vasistha C. Patel in the terms of Regulation 31(1) read with Regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge the documents.

Thanking You,

Yours faithfully,

VasistbaC. Patel Promoter Group

CC:

To,

Compliance Officer

Sadbhav Engineering Limited

Address: Sadbhav House, Opp. Law Garden Police Chowki,

Ellisbridge, Ahmedabad - 380006, Gujarat.

Annexure II

Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular dated August 05, 2015)

Name of listed company	Sadbhav Engineering Limited				
Name of the recognised stock exchanges where the shares of the company are listed	BSE Limited				
· ·	National Stock Exchange of India Limited				
Name of the promoter(s) / PACs whose shares have been encumbered	Mr. Vasistha C. Patel				
Total promoter shareholding in the listed company	No. of shares	8,01,94,394			
, , , , , , , , , , , , , , , , , , ,	% of total share capital	46.74% of total share capital			
Encumbered shares as a % of promoter shareholding	78.61%				
Whether encumbered share is 50% or more of promoter shareholding	YES				
Whether encumbered share is 20% or more of total share capital	YES	<u> </u>			

Details of all the existing events/ agreements pertaining to encumbrance Encumbrance 2 Encumbrance 1 (Date of creation of encumbrance: 15.02.2020 (Date of encumbrance: 12.02.2020 & Additional encumbrance: 19.02.2020, Additional encumbrance: 25.02.2020, 03.03.2020, 03.03.2020,03.04.2020) 09.03.2020) Pledge Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, Pledge transaction, condition or arrangement in the nature of encumbrance) 1,75,000 No. of shares 2,75,000 No. and % of shares encumbered 0.10% of total share capital 0.16% of total share capital % of total share capital 3,34,692 7.00.000 No. of shares 0.20% of total share capital % of total share capital 0.41% of total share capital 1,14,500 6.06.000 No. of shares 0.07% of total share capital 0.35% of total share capital % of total share capital 4.67,259 No. of shares 7,50,000 0.27% of total share Capital 0.44% of total share capital % of total share capital 10.91,451 Total No. of Shares 23,31,000 encumbered as on date 30.03.2021 0.64% Total % of Shares encumbered 1.36% as on date 30.03.2021 Aditya Birla Finance Limited RBL Bank Ltd. Specific details about Name of the entity in whose favour shares encumbered (X) the encumbrance Whether the entity X is a scheduled commercial bank, public financial institution, NBFC YES / NO Yes or housing finance company? If No, provide the nature of the business of the entity. Listed company and its group companies (if any) -Listed company and its group companies (if Names of all other entities in the agreement 1. RBL Bank Ltd. 1. Aditya Birla Finance Limited Other entities (if any) 1. Mr. Vasistha C. Patel Other entities (if any) 1. Mr. Vasistha C. Patel

l	Whether the encumbrance is relating to any debt instruments viz. debenture,	YES / NO (if Yes,)	No	No
]	commercial paper, certificate of deposit etc.? If yes, provide details about the	1. Name of Issuer	-	-
	instrument, including credit rating		<u> </u>	
		2. Details of the debt	-	<u> </u>
]		instrument 3. Whether the debt	<u> </u>	
			-	[
		instrument is listed on stock		
1		exchanges?		
		4. Credit Rating of the debt	-	-
		instrument		
		5. ISIN of the instrument	<u> </u>	
Security Cover / Asset	t Value of shares on the date of event / agreement (A)	Value based on closing price of	Rs. 2,97,00,000/- (As on 12.02.2020)	Rs. 1,74,56,250/- (As on 15.02.2020)
Cover		either NSE or BSE as on date of		
-		pledge.		
ļ	Amount involved (against which shares have been encumbered) (B)		Rs. 10,00,00,000/-	Rs. 8,00,00,000/-
	Ratio of A / B		0.30	0.22
,	Value of shares on the date of event / agreement (A)	Value based on closing price of	Rs. 5,70,50,000/- (As on 19.02.2020)	Rs. 2,61,39,445/- (As on 25.02.2020)
1		either NSE or BSE as on date of		1
		pledge.		
	Amount involved (against which shares have been encumbered) (B)		Rs. 10,00,00,000/-	Rs. 8,00,00,000/-
	Ratio of A / B		0.57	0.33
ļ	Value of shares on the date of event / agreement (A)		Rs. 4,09,95,900/- (As on 03.03.2020)	Rs. 77,45,925/- (As on 03.03.2020)
		either NSE or BSE as on date of		
		pledge.		
	Amount involved (against which shares have been encumbered) (B)		Rs. 10,00,00,000/-	Rs. 8,00,00,000/-
	Ratio of A / B		0.41	0.10
<u> </u> :	Value of shares on the date of event / agreement (A)		Rs. 1,90,87,500/- (As on 03.04.2020)	Rs. 2,44,37,646/- (As on 09.03.2020)
	·	either NSE or BSE as on date of		
		pledge.		
	Amount involved (against which shares have been encumbered) (B)		Rs. 10,00,00,000/-	Rs. 8,00,00,000/-
	Ratio of A / B		0.19	0.31
End use of money	Borrowed amount to be utilized for what purpose –		<u> </u>	
	(a) Personal use by promoters and PACs		Yes	Yes
			Purpose - Repayment	Purpose - Repayment of Existing Debt
	(b) For the benefit of listed company		No	No
	Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.		-	-
			No -	No
	(a) Any other reason (please specify)			-' ,

Date: 01.04.2021
Place: Ahmedabad