

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

Date: February 04, 2021

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

Company Code: 532710 (BSE)

NSE Symbol: SADBHAV (NSE)

Dear Sir/ Madam,

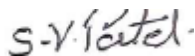
Sub: Disclosure in terms of Regulation 31(1) read with Regulation 28(3) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

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 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

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

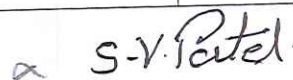
Name of listed company	Sadbhav Engineering Limited						
Name of the recognized stock exchanges where the shares of the company are listed	<ul style="list-style-type: none"> • BSE Limited • National Stock Exchange of India Limited 						
Name of the promoter(s) / PACs whose shares have been encumbered	Mr. Shantaben V. Patel						
Total promoter shareholding in the listed company	<table border="1"> <tr> <td>No. of shares</td><td>8,01,94,394</td></tr> <tr> <td>% of total share capital</td><td>46.74% of total share capital</td></tr> <tr> <td></td><td>58.03%</td></tr> </table>	No. of shares	8,01,94,394	% of total share capital	46.74% of total share capital		58.03%
No. of shares	8,01,94,394						
% of total share capital	46.74% of total share capital						
	58.03%						
Encumbered shares as a % of promoter shareholding							
Whether encumbered share is 50% or more of promoter shareholding	YES						
Whether encumbered share is 20% or more of total share capital	YES						

Details of all the existing events/ agreements pertaining to encumbrance

Details of all the existing events/ agreements pertaining to encumbrance								
		Encumbrance 1 (Date of creation of encumbrance: 07.02.2019 & Additional encumbrance: 04.04.2019, 19.07.2019,01.08.2019,20.01.2020, 19.02.2020, 09.03.2020, 11.03.2020,20.03.2020, 03.04.2020)	Encumbrance 2 (Date of creation of encumbrance: 07.02.2019 & Additional encumbrance: 18.06.2019,17.07.2019,23.07.2019,25.07.2020 , 08.08.2019,06.02.2020, 27.02.2020 & 02.03.2020,09.03.2020,11.03.2020)	Encumbrance 3 (Date of creation of encumbrance: 29.01.2019 & Additional encumbrance: 14.02.2019,31.07.2019, 01.08.2019, 23.01.2020, 24.01.2020,04.02.2020,14.02.2020, 18.02.2020,19.02.2020,03.03.2020, 09.03.2020,11.03.2020,18.03.2020)	Encumbrance 4 (Date of creation of encumbrance: 29.03.2019 & Additional encumbrance: 04.04.2019,11.07.2019, 19.07.2019, 05.08.2019, 26.02.2020,09.03.2020, 03.03.2020,09.03.2020, 22.05.2020, 27.05.2020)	Encumbrance 5 (Date of creation of encumbrance: 29.01.2020 & Additional encumbrance: 04.02.2020,13.02.2020, 26.02.2020, 03.03.2020,09.03.2020, 20.03.2020)	Encumbrance 6 (Date of creation of encumbrance: 15.11.2019 & Additional encumbrance: 14.02.2020,15.02.2020, 24.02.2020, 27.02.2020, 18.11.2020)	Encumbrance 7 (Date of creation of encumbrance: 31.01.2020 & 01.02.2021)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge	Pledge	Pledge	Pledge	Pledge	Pledge
No. and % of shares encumbered	No. of shares	276664 (dated 07.02.2019)	1464314 (dated 07.02.2019)	1441627 (dated 29.01.2019)	1125000 (dated 29.03.2019)	3800000 (dated 29.01.2020)	7239655 (dated 15.01.2019)	4300000 (dated 31.01.2020)
	% of total share capital	0.16% of total 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	4.22% of total share capital	2.51% 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)	400000 (dated 14.02.2020)	4300000 (Released date 01.02.2021)
	% 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	0.23% of total share capital	2.50% 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)	1200000 (dated 15.02.2020)	
	% 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	0.70% of total share capital	
	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 26.02.2020)	1000000 (dated 24.02.2020)	
	% 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	0.58% 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)	9794142 (Released date 27.02.2020)	
	% 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	5.71% of total share capital	
	No. of shares	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)	45513 (Released date 18.11.2020)	
	% of total share capital	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	0.02% of total share capital	
	No. of shares	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)		
	% of total share capital	0.35% of total share capital	0.30% of total share capital	0.23% of total share capital	0.27% of total share capital	0.63% of total share capital		
	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 share capital	0.18% of total share capital	0.58% of total share capital			
	No. of shares	1109594 (dated 11.03.2020)	389179 (dated 02.03.2019)	450000 (dated 15.02.2020)	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	0.45% of total share capital				
	No. of shares	750000 (dated 03.04.2020)		493182 (dated 09.03.2020)				
	% 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				
				1000000 (dated 18.03.2020)				
				0.58% of total share capital				

Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	Aditya Birla Finance Ltd.	Axis Finance Ltd.	Tata Capital Financial Services Ltd.	RBL Bank Ltd.	STCI Finance Ltd.	Clix Finance Ltd.	SREI Equipment Finance Ltd.	
	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	Yes	Yes	Yes	Yes	
	Names of all other entities in the agreement	Listed company and its group companies (if any) - 1. Aditya Birla Finance Ltd. Other entities (if any) 1. Mr. Vikram R. Patel 2. Mr. Vasistha C. Patel	Listed company and its group companies (if any) - 1. Axis Finance Ltd. Other entities (if any) 1. Mr. Vikram R. Patel	Listed company and its group companies (if any) - 1. Tata Financial Services Ltd. Other entities (if any) 1. Mr. Shashin V. Patel 2. Mr. Vikram R. Patel 3. Mr. Vasistha C. Patel	Listed company and its group companies (if any) - 1. RBL Bank Ltd. Other entities (if any) 1. Mr. Shashin V. Patel 2. Mr. Vikram R. Patel 3. Mr. Vasistha C. Patel	Listed company and its group companies (if any) - 1. STCI Finance Ltd. Other entities (if any) 1. SADBHAV Engineering Limited	Listed company and its group companies (if any) - 1. Clix Finance India Pvt. Ltd. Other entities (if any) 1. SADBHAV Infrastructure Project Limited	Listed company and its group companies (if any) - 1. SREI Equipment Finance Ltd. Other entities (if any) 1. SADBHAV Engineering Limited	
	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,.)	No	No	No	No	No	No	
	1. Name of the issuer	-	-	-	-	-	-	-	
	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	-	-	-	-	-	-	-	
Security Cover / Asset Cover	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. 5,17,22,335/- (as on 07.02.2019)	Rs. 27,37,53,502/- (as on 07.02.2019)	Rs. 18,46,72,419/- (as on 29.01.2019)	Rs. 27,95,06,250/- (as on 29.03.2019)	Rs. 48,67,80,000/- (as on 29.01.2020)	Rs. 86,80,34,634/- (as on 15.11.2019)	Rs. 55,72,80,000/- (as on 31.01.2020)
	Amount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs. 6,03,00,000/-	Rs. 10,85,00,000/-	Rs. 25,00,00,000	Rs. 23,00,00,000/-	Rs. 35,00,00,000/-	Rs. 130,00,00,000/-
	Ratio of A / B		0.26	4.54	1.70	1.11	2.11	2.48	0.43
	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. 9,18,25,953/- (as on 04.04.2019)	Rs. 37,49,25,682/- (Released as on 18.06.2019)	Rs. 2,56,13,291/- (as on 14.02.2019)	Rs. 18,34,87,500/- (as on 04.04.2019)	Rs. 2,26,29,750/- (as on 04.02.2020)	Rs. 3,99,00,000/- (as on 14.02.2020)	Rs. 26,31,60,000/- (as on 02.02.2021)
	Amount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs. 6,03,00,000/-	Rs. 10,85,00,000/-	Rs. 25,00,00,000	Rs. 23,00,00,000/-	Rs. 35,00,00,000/-	Rs. 130,00,00,000/-
	Ratio of A / B		0.46	6.21	0.23	0.73	0.09	0.11	0.20
	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. 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. 1,43,93,385/- (as on 11.07.2019)	Rs. 12,96,00,000/- (as on 12.02.2020)	Rs. 11,66,40,000/- (as on 15.02.2020)	
	Amount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs. 6,03,00,000/-	Rs. 10,85,00,000/-	Rs. 25,00,00,000	Rs. 23,00,00,000/-	Rs. 35,00,00,000/-	
	Ratio of A / B		0.45	0.48	0.24	0.06	0.56	0.33	
	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. 15,04,52,740/- (as on 01.08.2019)	Rs. 23,98,514/- (Released as on 23.07.2019)	Rs. 7,14,96,000/- (as on 01.08.2019)	Rs. 7,04,83,609/- (as on 19.07.2019)	Rs. 11,85,75,000/- (as on 26.02.2020)	Rs. 7,96,00,000/- (as on 24.02.2020)	
	Amount 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/-	Rs. 35,00,00,000/-	
	Ratio of A / B		0.75	0.016	0.66	0.28	0.51	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. 13,22,50,450/- (as on 20.01.2020)	Rs. 3,30,30,500/- (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 03.03.2020)	Rs. 74,63,13,620/- (as on 27.02.2020)	
	Amount 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/-	Rs. 35,00,00,000/-	
	Ratio of A / B		0.68	0.26	3.35	0.38	0.11	2.13	
	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. 5,70,50,000/- (as on 19.02.2020)	Rs. 11,10,67,200/- (as on 08.08.2019)	Rs. 31,14,60,000/- (Released as on 24.01.2020)	Rs. 2,76,83,411/- (as on 20.02.2020)	Rs. 10,98,30,000/- (as on 09.03.2020)	Rs. 23,02,958/- (as on 18.11.2020)	
	Amount 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/-	Rs. 35,00,00,000/-	
	Ratio of A / B		0.28	0.07	2.87	0.11	0.47	0.01	
	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. 31380000/- (as on 09.03.2020)	Rs. 7,00,16,500/- (Released as on 06.02.2020)	Rs. 2,64,20,000/- (as on 04.02.2020)	Rs. 2,44,34,665/- (as on 09.03.2020)	Rs. 1,68,81,739/- (as on 20.03.2020)		
	Amount 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. 19,00,00,000/-		
	Ratio of A / B		0.16	0.55	0.43	0.10	0.09		
	Value 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. 3,96,00,000/- (As on 22.05.2020)			
	Amount 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			
	Ratio of A / B		0.28	0.32	0.29	0.16			
Value of shares on the date of event / agreement (A)		Rs. 56089977/- (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)				
Amount 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				
Ratio of A / B		0.28	0.21	0.37	0.08				
Value 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)					
Amount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs. 12,67,00,000/-	Rs. 10,85,00,000/-					
Ratio of A / B		0.07	0.22	0.58					
Value of shares on the date of event / agreement (A)		Rs. 14738658/- (as on 20.03.2020)	Rs. 3,88,16,233/- (as on 11.03.2020)	Rs. 5,32,34,750/- (as on 03.03.2020)					
Amount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-	Rs. 12,67,00,000/-	Rs. 10,85,00,000/-					
Ratio of A / B		0.07	0.31	0.49					
Value 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)					
Amount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/-		Rs. 10,85,00,000/-					
Ratio of A / B		0.09		0.23					
Value of shares on the date of event / agreement (A)				Rs. 6,54,80,883/- (as on 11.03.2020)					
Amount involved (against which shares have been encumbered) (B)				Rs. 10,85,00,000/-					
Ratio of A / B				0.61					
Value of shares on the date of event / agreement (A)				Rs. 1,54,50,000/- (as on 18.03.2020)					
Amount involved (against which shares have been encumbered) (B)				Rs. 10,85,00,000/-					
Ratio of A / B				0.14					

End use of money	Borrowed amount to be utilized for what purpose - (a) Personal use by promoters and PACs (b) For the benefit of listed company Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc. (a) Any other reason (please specify)	No	No	Yes	No	No	No	No
		No	No	No	No	Yes	Yes	Yes
		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	As per Sanction Letter	As per Sanction Letter
		Security for third party	Security for third party	Personal Use	Security for third party	Borrowing by Sadbhav Engineering Limited and pledge of Equity shares of Sadbhav Engineering Ltd. as a part of Sanction Letter.	Borrowing by Sadbhav Infrastructure Project Limited and pledge of Equity shares of Sadbhav Engineering Ltd. as a part of Sanction Letter.	Additional Security given by Promoter for Borrowing in the Sadbhav Engineering Limited


 Shantaben V. Patel
 Promoter of the Company

Date: 04.02.2021
 Place: Ahmedabad

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

Date: February 04, 2021

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

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. 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.

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	<ul style="list-style-type: none"> • BSE Limited • National Stock Exchange of India Limited 	
Name of the promoter(s) / PACs whose shares have been encumbered	Mr. Shashin V. 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	58.03%	
Whether encumbered share is 50% or more of promoter shareholding	YES	
Whether encumbered share is 20% or more of total share capital	YES	

Details of all the existing 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)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge
No. and % of shares encumbered	No. of shares	2,84,090	31,83,333
	% of total share capital	0.16% of total share capital	1.85% of total share capital
	No. of shares	1,95,000	
	% of total share capital	0.11% of total share capital	
	No. of shares	3,76,527	
	% of total share capital	0.22% of total share capital	
	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 03.02.2021		15,10,283	31,83,333
Total % of Shares encumbered as on date 03.02.2021		0.88%	1.85%
Specific details about 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
	Names of all other entities in the agreement	Listed company and its group companies (if any) - 1. RBL Bank Ltd. Other entities (if any) 1. Mr. Shashin V. Patel	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

Security Cover / Asset Cover	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,)	No	No
		1. Name of Issuer	-	-
		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)
	Amount involved (against which shares have been encumbered) (B)		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)	
End use of money	Amount involved (against which shares have been encumbered) (B)		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/-	
End use of money	Ratio of A / B		0.31	
	Borrowed amount to be utilized for what purpose –			
	(a) Personal use by promoters and PACs		Yes. Purpose - Repayment of existing debts	Yes. 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

Su Patel
Shashin V. Patel
Promoter Group

Date: 04-02-2021
Place: Ahmedabad

VASISTHA C. PATEL
27, Shashwat Bungalows, S.G. Highway, B/h. Rajpath Club,
Bodakdev, Ahmedabad - 380059, Gujarat.

Date: February 04, 2021

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

Company Code: 532710 (BSE)

NSE Symbol: SADBHAV (NSE)

Dear Sir/ Madam,

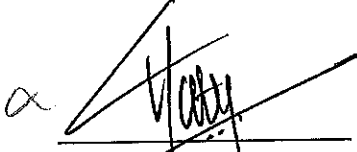
Sub: Disclosure in terms of Regulation 31(1) read with Regulation 28(3) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

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,



Vasistha C. 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)

(in addition to Annexure -I, prescribed by way of circular dated 11.01.2019)

Name of listed company	Sadbhav Engineering Limited	
Name of the recognised stock exchanges where the shares of the company are listed	<ul style="list-style-type: none">• 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	58.03%	
Whether encumbered share is 50% or more of promoter shareholding	YES	
Whether encumbered share is 20% or more of total share capital	YES	

Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 1 (Date of encumbrance: 12.02.2020 & Additional encumbrance: 19.02.2020, 03.03.2020,03.04.2020)	Encumbrance 2 (Date of creation of encumbrance: 15.02.2020 & Additional encumbrance: 25.02.2020, 03.03.2020, 09.03.2020)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge
No. and % of shares encumbered	No. of shares	2,75,000	1,75,000
	% of total share capital	0.16% of total share capital	0.10% of total share capital
	No. of shares	7,00,000	3,34,692
	% of total share capital	0.41% of total share capital	0.20% of total share capital
	No. of shares	6,06,000	1,14,500
	% of total share capital	0.35% of total share capital	0.07% of total share capital
	No. of shares	7,50,000	4,67,259
	% of total share capital	0.44% of total share capital	0.27% of total share Capital
Total No. of Shares encumbered as on date 03.02.2021		23,31,000	10,91,451
Total % of Shares encumbered as on date 03.02.2021		1.36%	0.64%
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	Aditya Birla Finance Limited	RBL Bank Ltd.
	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. Aditya Birla Finance Limited Other entities (if any) 1. Mr. Vasistha C. Patel	Listed company and its group companies (if any) - 1. RBL Bank Ltd. Other entities (if any) 1. Mr. Vasistha C. Patel

	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,)	No	No
		1. Name of issuer	-	-
		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	-	-
Security Cover / Asset Cover	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. 2,97,00,000/- (As on 12.02.2020)	Rs. 1,74,56,250/- (As on 15.02.2020)
	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 either NSE or BSE as on date of pledge.	Rs. 5,70,50,000/- (As on 19.02.2020)	Rs. 2,61,39,445/- (As on 25.02.2020)
	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
	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. 4,09,95,900/- (As on 03.03.2020)	Rs. 77,45,925/- (As on 03.03.2020)
	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
	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. 1,90,87,500/- (As on 03.04.2020)	Rs. 2,44,37,646/- (As on 09.03.2020)
	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 --			
	(a) Personal use by promoters and PACs		Yes Purpose - Repayment	Yes 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.		-	-
	(a) Any other reason (please specify)		No	No

Date: 04-02-2021
Place: Ahmedabad


Vasistha C. Patel
Promoter Group

VIKRAM R. PATEL
1202, 12th Floor, SUN EVOQ, B/H GTPL Building, S.G. Highway,
Ahmedabad – 380059, Gujarat.

Date: February 05 , 2021

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

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. Vikram R. 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,



Vikram R. 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	<ul style="list-style-type: none"> • BSE Limited • National Stock Exchange of India Limited 	
Name of the promoter(s) / PACs whose shares have been encumbered	Mr. Vikram R. 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	58.03%	
Whether encumbered share is 50% or more of promoter shareholding	YES	
Whether encumbered share is 20% or more of total share capital	YES	

Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 1 (Date of creation of encumbrance: 29.06.2017 & Additional encumbrance: 22.08.2017, 11.12.2017, 13.03.2018, 04.06.2018, 06.06.2018, 09.07.2018, 26.09.2018, 01.10.2018, 30.10.2018, 18.06.2019, 18.06.2019, 28.06.2019, 23.07.2019, 30.09.2019, 18.02.2020)	Encumbrance 2 (Date of creation of encumbrance: 19.12.2019 & Additional encumbrance: 12.02.2020)	Encumbrance 3 (Date of creation of encumbrance: 15.02.2020 & Additional encumbrance: 05.03.2020)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge	Pledge
No. and % of shares encumbered	No. of shares	105000	3,94,500	1,75,000
	% of total share capital	0.06 % of total share capital	0.23% of total share capital	0.10% of total share capital
	No. of shares	15000	1,50,000	1,14,500
	% of total share capital	0.01% of total share capital	0.09% of total share capital	0.07% of total share capital
	No. of shares	-25000	-	-
	% of total share capital	0.01% of total share capital	-	-
	No. of shares	10000	-	-
	% of total share capital	0.01% of total share capital	-	-
	No. of shares	15000	-	-
	% of total share capital	0.01% of total share capital	-	-
	No. of shares	8000	-	-
	% of total share capital	0.00% of total share capital	-	-
	No. of shares	15000	-	-
	% of total share capital	0.01% of total share capital	-	-
	No. of shares	17400	-	-
	% of total share capital	0.01% of total share capital	-	-
	No. of shares	1100000	-	-
	% of total share capital	0.64% of total share capital	-	-
	No. of shares	69000	-	-
	% of total share capital	0.04% of total share capital	-	-
	No. of shares	-1103000	-	-
	% of total share capital	0.64% of total share capital	-	-
	No. of shares	452250	-	-
	% of total share capital	0.26% of total share capital	-	-

	No. of shares	648000	-	-	
	% of total share capital	0.38% of total share capital	-	-	
	No. of shares	-226400	-	-	
	% of total share capital	0.13% of total share capital	-	-	
	No. of shares	-105723	-	-	
	% of total share capital	0.06% of total share capital	-	-	
	No. of shares	272799	-	-	
	% of total share capital	0.16% of total share capital	-	-	
	Total No. of Shares encumbered as on date 03.02.2021	12,67,326	5,44,500	2,89,500	
	Total % of Shares encumbered as on date 03.02.2021	0.73%	0.32%	0.17%	
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)		Axis Finance Ltd.	Aditya Birla Finance Limited	RBL Bank Ltd.
	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	YES / NO	Yes	Yes	Yes
	Names of all other entities in the agreement		Listed company and its group companies (if any) - 1. Axis Finance Limited Other entities (if any) 1. Mr. Vikram R. Patel	Listed company and its group companies (if any) - 1. Aditya Birla Finance Limited Other entities (if any) 1. Mr. Vikram R. Patel	Listed company and its group companies (if any) - 1. RBL Bank Ltd. Other entities (if any) 1. Mr. Vikram R. Patel
	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,)	No	No	No
		1. Name of Issuer	-	-	-
		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	-	-	-
Security Cover / Asset Cover	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. 3,21,61,500/- (As on 29.06.2017)	Rs. 4,50,12,450/- (As on 19.12.2019)	Rs. 1,56,88,750/- (As on 18.02.2020)
	Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-	Rs. 10,00,00,000/-	Rs. 8,00,00,000/-
	Ratio of A / B		0.53	0.45	0.20
	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. 39,54,750/- (As on 22.08.2017)	Rs. 1,62,00,000/- (As on 12.02.2020)	Rs. 71,04,725/- (As on 05.03.2020)
	Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-	Rs. 10,00,00,000/-	Rs. 8,00,00,000/-
	Ratio of A / B		0.07	0.16	0.09
	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. 93,27,500/- (As on 11.12.2017)		
	Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
	Ratio of A / B		0.15		

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. 38,15,000/- (As on 13.03.2018)		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
Ratio of A / B		0.06		
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. 51,58,500/- (As on 04.06.2018)		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
Ratio of A / B		0.08		
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. 25,59,200/- (As on 06.06.2018)		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
Ratio of A / B		0.04		
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. 22,40,000/- (As on 09.07.2018)		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
Ratio of A / B		0.04		
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. 41,64,690/- (As on 26.09.2018)		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
Ratio of A / B		0.07		
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. 24,65,10,000/- (As on 01.10.2018)		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
Ratio of A / B		4.09		
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. 1,35,89,550/- (As on 30.10.2018)		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
Ratio of A / B		0.23		
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. 28,51,80,650/- (As on 18.06.2019)		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
Ratio of A / B		4.73		
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. 11,69,29,237/- (As on 18.06.2019)		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
Ratio of A / B		1.94		
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. 15,94,72,800/- (As on 28.06.2019)		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-		
Ratio of A / B		2.64		

	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. 3,82,27,640/- (As on 23.07.2019)		
	Amount involved (against which shares have been encumbered) (B)		Rs. 14,67,00,000/-		
	Ratio of A / B		0.26		
	Value of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE	Rs. 1,49,75,662/- (As on 30.09.2019)		
	Amount involved (against which shares have been encumbered) (B)		Rs. 12,67,00,000/-		
	Ratio of A / B		0.12		
	Value of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE	Rs. 2,44,56,430/- (As on 18.02.2020)		
	Amount involved (against which shares have been encumbered) (B)		Rs. 12,67,00,000/-		
	Ratio of A / B		0.19		
End use of money	Borrowed amount to be utilized for what purpose –				
	(a) Personal use by promoters and PACs		Yes Purpose - General Purpose	Yes Purpose - Repayment	Yes Purpose - Repayment of Existing Debt
	(b) For the benefit of listed company		No	No	No
	Provide details including amount, purpose of raising money by listed company, schedule for utilization of		-	-	-
	(a) Any other reason (please specify)		No	No	No

Date: 05-02-2021
Place: Ahmedabad


Vikram R. Patel
Promoter Group