

## INTEGRATED CAPITAL SERVICES LIMITED

Restructuring Advisory and Support



Date: 22.06.2020.

To,  
Corporate Relationship Department  
**The BSE Limited**  
P.J. Towers  
1<sup>st</sup> Floor, New Trading Ring  
Dalal Street, Mumbai 400 001.

**Ref: BSE Scrip Code: 539149 and Scrip ID: ICSL**

**Sub: Intimation of receipt of requests from 5 (five) shareholders and members of the Company seeking their Reclassification from "Promoter and Promoter Group" Category to "Public" Category - As per Regulation 31A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["SEBI (LODR) Regulation"].**

Dear Sir/Madam,

In accordance with Regulation 31A(8)(a) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, it is informed that the Company has received requests from its 5 (five) number Shareholders and Members seeking their Reclassification from 'Promoter and Promoter Group' category to 'Pubic' category.

The aforementioned requests have been received from the following four (4) number shareholders / members of the Company who are relatives of each other:

Sr. No.	Name of Shareholder / Member	No. of fully paid-up Equity Shares held	Percentage (%) of Shareholding	Relation with Promoter seeking reclassification
1.	Mr. Brijinder Bhushan Deora	3,49,600	0.982%	Immediate Relative
2.	Mrs. Jai Rani Deora	4,08,340	1.14%	Immediate Relative
3.	Mr. Rajeev Kumar Deora	23,98,550	6.74%	Immediate Relative
4.	Mr. Arun Deora	3,98,550	1.12%	Immediate Relative
	<b>Total</b>	<b>35,55,040</b>	<b>9.982</b>	

Registered Office:

606 New Delhi House, 27 Barakhamba Road, New Delhi 110 001

T/F + 91 11 4354 2784, WhatsApp + 91 9811903458, Email [contact@raas.co.in](mailto:contact@raas.co.in).

Website: [www.raas.co.in](http://www.raas.co.in)

Corporate Identification Number L74899DL1993PLC051981



## INTEGRATED CAPITAL SERVICES LIMITED

Restructuring Advisory and Support



The aforementioned request has been received from the following one (1) number shareholder / member of the Company who is not related to any of the other four (4) persons seeking reclassification:

S. No.	Name of Shareholder / Member	No. of fully paid-up Equity Shares held	Percentage (%) of Shareholding	Relation with Promoter seeking reclassification
1	Ambarish Chatterjee	24,475	0.07%	None

The aforementioned shareholders / members are presently classified as part of "Promoter and Promoter Group" of the Company, as also stated in the latest shareholding pattern filed by the Company on BSE Limited on May 13, 2020, which was for the quarter and year ended March 31, 2020.

The requests seeking reclassification received from the aforementioned shareholders / members are enclosed.

The aforementioned requests seeking reclassification of shareholders / members from "Promoter & Promoter Group" to "Public" Category will be considered by the Board of Directors at their ensuing Meeting, and if approved, will be placed for consideration and approval of shareholders of the Company at the ensuing meeting.

The Company shall initiate the necessary required action in terms of Regulation 31 of the ("SEBI)(LODR) Regulations") and make necessary application to BSE Ltd. seeking reclassification of status of the aforementioned 5 (five) number shareholders / members of the Company in accordance with applicable provisions.

It is requested that this intimation, along with enclosures, is taken on record and disseminated on the website of BSE Ltd.

Thanking you,  
**For Integrated Capital Services Limited**

  
**Sajeev Deora**  
Director  
DIN: 00003305  
Place: New Delhi

Registered Office:  
606 New Delhi House, 27 Barakhamba Road, New Delhi 110 001  
T/F: + 91 11 4354 2784, WhatsApp + 91 9811903458, Email [contact@raas.co.in](mailto:contact@raas.co.in),  
Website [www.raas.co.in](http://www.raas.co.in),  
Corporate Identification Number [L74899DL1993PLC051981]

  
2  
 BTG Global Advisory

Date: 21.06.2020

The Board of Directors  
Integrated Capital Services Limited  
606 New Delhi House  
27 Barakhamba Road  
New Delhi 110 001.

**Sub: Application for reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulation).**

Dear Sir,

I, Brijinder Bhushan Deora, s/o Late Shri Behari Lal Deora, r/o C-43, Inderpuri, New Delhi-110012 am presently holding 3,98,550 fully paid-up equity shares of a nominal value of Re. 1.00 each of Integrated Capital Services Limited (Scrip Code:539149), the Company, which constitutes 1.12% of the total issued paid up share capital of the Company.

It is informed that by virtue of the fact that I was a shareholder of Deora Associates Private Limited (Since Dissolved), the Holding Company of the Company, and that the former had merged with Integrated Capital Services Limited (Transferee Company) in terms of approval of the Scheme of Merger by the Hon'ble National Company Law Tribunal, New Delhi, vide its Order dated September 26, 2018, I was classified as a Promoter of the Company. In terms of the aforesaid Scheme, 2,50,41,000 Equity Shares of Re. 1.00 each held by Deora Associates Private Limited (Since Dissolved) in the Company were cancelled and 2,44,75,000 fully paid up equity shares of the Company were issued to the erstwhile shareholders of Deora Associates Private Limited (Since Dissolved) in the share exchange ratio stated in the aforesaid Scheme. The Appointed Date of the Scheme was October 01, 2016 and the shares of the Company were allotted after due approvals and permissions, including from BSE, and the shares issued on stock swap were listed for trading on BSE.

As mentioned above, it was in the circumstances as explained that I and all other shareholders of Deora Associates Private Limited (Since Dissolved) were categorised as Promoters of Integrated Capital Services Limited, the Company. I was issued 23,98,550 fully paid equity shares of the Company, constituting 6.74% of the total issued and paid up share capital of the Company.

It is further informed that in terms of the Memorandum of Gift dated 18.12.2019 executed by me, I had gifted 20,00,000 fully paid equity shares of the Company owned by me to Mr. Sajeve Deora, and the balance fully paid equity shares of the Company, being 3,98,550 equity shares, i.e., 1.12% of the total issued and paid up equity capital of the Company, continue to be held by me. The gift was carried out on 18.12.2019 as an Inter-se Transfer of Shares under Regulation 10(1)(a)(i) and 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, and all filings in relation thereto were completed by me and by Mr. Sajeve Deora.

It is mentioned that, I had held office as non-executive director and chairman of the Company from 25.07.2007 and I have resigned from office on June 19, 2020 and it is further mentioned that, I am not connected, directly or indirectly, in any manner whatsoever, with any activity of the Company and do not have any direct or indirect control over the affairs or the decision making process of the Company. I am not dependent, either financially or otherwise, for my life and living on Mr. Sajeve Deora or any other person/s who wish to continue as Promoter of the Company, and would request the Company to re-classify my status from "Promoter & Promoter Group" to Public Category".



In this regard, I confirm and undertake as follows:

- a) I do not hold more than 10% (ten percent) of the total voting rights in the Company;
- b) I do not exercise control over the affairs of the Company, whether directly or indirectly;
- c) I do not have any special rights with respect to the Company through formal or informal arrangements, including through any shareholder agreements;
- d) I am not represented on the Board of Directors of the Company, either by myself or through a nominee director;
- e) I am not acting as a key managerial personnel in the Company;
- f) I am not a 'wilful defaulter' as per the Reserve Bank of India guidelines; and
- g) I am not a fugitive economic offender.

I understand that similar applications are being made by Mr. Arun Deora, Mrs. Jai Rani Deora, Mr. Rajeev Kumar Deora and Mr. Ambarish Chatterjee who also held equity shares in Deora Associates Private Limited (Since Dissolved) and were also classified as Promoters of the Company in the same circumstances as mentioned above. I wish to place on record that Mr. Arun Deora, Mr. Rajeev Kumar Deora, Mrs. Jai Rani Deora are my immediate relatives as per section 2(pp)(ii) of Securities And Exchange Board of India (Issue of Capital And Disclosure Requirements) Regulations, 2018. I am filing this request / application in my own right and independent of any other shareholder of the Company. I am given to understand that the aforementioned persons may also file an application seeking reclassification from "Promoter & Promoter Group" to "Public", which action will be their independent action.

In view of the above, I hereby seek that my status in the Company be reclassified from "Promoter & Promoter Group" to "Public" and I further request the Company to initiate required action/s in terms of Regulation 31A of the Listing Regulations and to make necessary application to the Stock Exchange for reclassification of my status in the Company within the time stipulated thereunder.

Thanking you,

Yours faithfully,



Brijinder Bhushan Deora

C- 43, Inderpuri,

New Delhi 110 012

Mobile No : +91 98119 03456.

Email: [b.bhushan@deora.com](mailto:b.bhushan@deora.com)

Date 21.06.2020

The Board of Directors  
Integrated Capital Services Limited  
606 New Delhi House  
27 Barakhamba Road  
New Delhi 110 001.

**Sub: Application for reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulation).**

Dear Sir,

I, Jai Rani Deora, w/o Mr. Brijinder Bhushan Deora, r/o C 43, Inderpuri, New Delhi 110 012, am presently holding 4,08,340 fully paid-up equity shares of a nominal value of Re. 1.00 each of Integrated Capital Services Limited (Scrip Code:539149), the Company, which constitutes 1.14% of the total issued paid up share capital of the Company.

It is informed that by virtue of the fact that I was a shareholder of Deora Associates Private Limited (Since Dissolved), the Holding Company of the Company, and that the former had merged with Integrated Capital Services Limited (Transferee Company) in terms of approval of the Scheme of Merger by the Hon'ble National Company Law Tribunal, New Delhi, vide its Order dated September 26, 2018, I was classified as a Promoter of the Company. In terms of the aforesaid Scheme, 2,50,41,000 Equity Shares of Re. 1 each held by Deora Associates Private Limited (Since Dissolved) in the Company were cancelled and 2,44,75,000 fully paid up equity shares of the Company were issued to the erstwhile shareholders of Deora Associates Private Limited (Since Dissolved) in the share exchange ratio stated in the aforesaid Scheme. The Appointed Date of the Scheme was October 01, 2016 and the shares of the Company were allotted after due approvals and permissions, including from BSE, and the shares issued on stock swap were listed for trading on BSE.

As mentioned above, it was in the circumstances as explained that I and all other shareholders of Deora Associates Private Limited (Since Dissolved) were categorised as Promoters of Integrated Capital Services Limited, the Company. I was issued 24,08,340 fully paid equity shares of the Company, constituting 6.76% of the total issued and paid up share capital of the Company.

It is further informed that in terms of the Memorandum of Gift dated 20.01.2020 executed by me, I had gifted 20,00,000 fully paid equity shares of the Company owned by me to Mr. Sajeve Deora, and the balance fully paid equity shares of the Company, being 4,08,340 equity shares, i.e., 1.14% of the total issued and paid up equity capital of the Company, continue to be held by me. The gift was carried out on 20.01.2020 as an Inter-se Transfer of Shares under Regulation 10(1)(a)(i) and 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, and all filings in relation thereto were completed by me and by Mr. Sajeve Deora.

It is mentioned that I am not connected, directly or indirectly, in any manner whatsoever, with any activity of the Company and do not have any direct or indirect control over the affairs or the decision making process of the Company. I am not dependent, either financially or otherwise, for my life and living on Mr. Sajeve Deora or any other person/s who wishes to continue as Promoter of the Company, and would request the Company to re-classify my status from "Promoter & Promoter Group" to Public Category".

Jai Rani

In this regard, I confirm and undertake as follows:

- a) I do not hold more than 10% (ten percent) of the total voting rights in the Company;
- b) I do not exercise control over the affairs of the Company, whether directly or indirectly;
- c) I do not have any special rights with respect to the Company through formal or informal arrangements, including through any shareholder agreements;
- d) I am not represented on the Board of Directors of the Company, either by myself or through a nominee director;
- e) I am not acting as a key managerial personnel in the Company;
- f) I am not a 'wilful defaulter' as per the Reserve Bank of India guidelines; and
- g) I am not a fugitive economic offender.

I understand that similar applications are being made by Mr. Brijinder Bhushan Deora, Mr. Rajeev Kumar Deora, Mr. Arun Deora and Mr. Ambarish Chatterjee who also held equity shares in Deora Associates Private Limited (Since Dissolved) and were also classified as Promoters of the Company in the same circumstances as mentioned above. I wish to place on record that Mr. Brijinder Bhushan Deora, Mr. Arun Deora, Mr. Rajeev Kumar Deora are my immediate relatives as per section 2(pp)(ii) of Securities And Exchange Board of India (Issue of Capital And Disclosure Requirements) Regulations, 2018. I am filing this request / application in my own right and independent of any other shareholder of the Company. I am given to understand that the aforementioned persons may also file an application seeking reclassification from "Promoter & Promoter Group" to "Public", which action will be their independent action.

In view of the above, I hereby seek that my status in the Company be reclassified from "Promoter & Promoter Group" to "Public" and I further request the Company to initiate required action/s in terms of Regulation 31A of the Listing Regulations and to make necessary application to the Stock Exchange for reclassification of my status in the Company within the time stipulated thereunder.

Thanking you,

Yours faithfully,

  
Jai Rani Deora

C 43, Inderpuri

New Delhi 110 012.

Mobile No: +91 98119 03456.

Email [b.bhushan@deora.com](mailto:b.bhushan@deora.com)



Date: 21.06.2020

The Board of Directors  
Integrated Capital Services Limited  
606 New Delhi House  
27 Barakhamba Road  
New Delhi 110 001.

**Sub: Application for reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulation).**

Dear Sir,

I, Arun Deora, s/o Mr. Brijinder Bhushan Deora, r/o C-43, Inderpuri, New Delhi-110012 am presently holding 3,98,550 fully paid-up equity shares of a nominal value of Re. 1.00 each of Integrated Capital Services Limited (Scrip Code:539149), the Company, which constitutes 1.12% of the total issued paid up share capital of the Company.

It is informed that by virtue of the fact that I was a shareholder of Deora Associates Private Limited (Since Dissolved), the Holding Company of the Company, and that the former had merged with Integrated Capital Services Limited (Transferee Company) in terms of approval of the Scheme of Merger by the Hon'ble National Company Law Tribunal, New Delhi, vide its Order dated September 26, 2018, I was classified as a Promoter of the Company. In terms of the aforesaid Scheme, 2,50,41,000 Equity Shares of Re. 1.00 each held by Deora Associates Private Limited (Since Dissolved) in the Company were cancelled and 2,44,75,000 fully paid up equity shares of the Company were issued to the erstwhile shareholders of Deora Associates Private Limited (Since Dissolved) in the share exchange ratio stated in the aforesaid Scheme. The Appointed Date of the Scheme was October 01, 2016 and the shares of the Company were allotted after due approvals and permissions, including from BSE, and the shares issued on stock swap were listed for trading on BSE.

As mentioned above, it was in the circumstances as explained that I and all other shareholders of Deora Associates Private Limited (Since Dissolved) were categorised as Promoters of Integrated Capital Services Limited, the Company. I was issued 23,98,550 fully paid equity shares of the Company, constituting 6.74% of the total issued and paid up share capital of the Company.

It is further informed that in terms of the Memorandum of Gift dated 20.01.2020 executed by me, I had gifted 20,00,000 fully paid equity shares of the Company owned by me to Mr. Sajeve Deora, and the balance fully paid equity shares of the Company, being 3,98,550 equity shares, i.e., 1.12% of the total issued and paid up equity capital of the Company, continue to be held by me. The gift was carried out on 20.01.2020 as an Inter-se Transfer of Shares under Regulation 10(1)(a)(i) and 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, and all filings in relation thereto were completed by me and by Mr. Sajeve Deora.

It is mentioned that, I had been holding a position of non-executive director of the Company from 25.07.2007 to 12.10.2018 on which date I resigned from the said office. It is mentioned further that, I am not connected, directly or indirectly, in any manner whatsoever, with any activity of the Company and do not have any direct or indirect control over the affairs or the decision making process of the Company. I am not dependent, either financially or otherwise, for my life and living on Mr. Sajeve Deora or any other person/s who wish to continue as Promoter of the Company, and would request the Company to re-classify my status from "Promoter & Promoter Group" to Public Category".

In this regard, I confirm and undertake as follows:

- a) I do not hold more than 10% (ten percent) of the total voting rights in the Company;
- b) I do not exercise control over the affairs of the Company, whether directly or indirectly;
- c) I do not have any special rights with respect to the Company through formal or informal arrangements, including through any shareholder agreements;
- d) I am not represented on the Board of Directors of the Company, either by myself or through a nominee director;
- e) I am not acting as a key managerial personnel in the Company;
- f) I am not a 'wilful defaulter' as per the Reserve Bank of India guidelines; and
- g) I am not a fugitive economic offender.'

I understand that similar applications are being made by Mr. Brijinder Bhushan Deora, Mrs. Jai Rani Deora, Mr. Rajeev Kumar Deora and Mr. Ambarish Chatterjee who also held equity shares in Deora Associates Private Limited (Since Dissolved) and were also classified as Promoters of the Company in the same circumstances as mentioned above. I wish to place on record that Mr. Brijinder Bhushan Deora, Mr. Rajeev Kumar Deora, Mrs. Jai Rani Deora are my immediate relatives as per section 2(pp)(ii) of Securities And Exchange Board of India (Issue of Capital And Disclosure Requirements) Regulations, 2018. I am filing this request / application in my own right and independent of any other shareholder of the Company. I am given to understand that the aforementioned persons may also file an application seeking reclassification from "Promoter & Promoter Group" to "Public", which action will be their independent action.

In view of the above, I hereby seek that my status in the Company be reclassified from "Promoter & Promoter Group" to "Public" and I further request the Company to initiate required action/s in terms of Regulation 31A of the Listing Regulations and to make necessary application to the Stock Exchange for reclassification of my status in the Company within the time stipulated thereunder.

Thanking you,

Yours faithfully,

*Arun Deora*

Arun Deora  
C-43, Inderpuri,  
New Delhi 110 012  
Mobile No: +91 9717111532  
Email: arun\_deora@rediffmail.com



Date: 21.06.2020

The Board of Directors  
Integrated Capital Services Limited  
606 New Delhi House  
27 Barakhamba Road  
New Delhi 110 001.

Sub: Application for reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulation).

Dear Sir,

I, Ambarish Chatterjee, son of Late Shri Ashim Kumar Chatterjee resident of A-395, Sector-19, Noida, Uttar Pradesh-201301 am presently holding 24,475 fully paid-up equity shares of a nominal value of Re. 1.00 each of Integrated Capital Services Limited (Scrip Code:539149), the Company, which constitutes 0.07% of the total issued paid up share capital of the Company.

It is informed that by virtue of the fact that I was a shareholder of Deora Associates Private Limited (Since Dissolved), the Holding Company of the Company, and that the former had merged with Integrated Capital Services Limited (Transferee Company) in terms of approval of the Scheme of Merger by the Hon'ble National Company Law Tribunal, New Delhi, vide its Order dated September 26, 2018, I was classified as a Promoter of the Company. In terms of the aforesaid Scheme, 2,50,41,000 Equity Shares of Re. 1 each held by Deora Associates Private Limited (Since Dissolved) in the Company were cancelled and 2,44,75,000 fully paid up equity shares of the Company were issued to the erstwhile shareholders of Deora Associates Private Limited (Since Dissolved) in the share exchange ratio stated in the aforesaid Scheme. The Appointed Date of the Scheme was October 01, 2016 and the shares of the Company were allotted after due approvals and permissions, including from BSE, and the shares issued on stock swap were listed for trading on BSE.

As mentioned above, it was in the circumstances as explained that I and all other shareholders of Deora Associates Private Limited (Since Dissolved) were categorised as Promoters of Integrated Capital Services Limited, the Company. I was issued 24,475 fully paid equity shares of the Company, constituting 0.07% of the total issued and paid up share capital of the Company.

It is mentioned that I am not connected, directly or indirectly, in any manner whatsoever, with any activity of the Company and do not have any direct or indirect control over the affairs or the decision making process of the Company. I am not dependent, either financially or otherwise, for my life and living on Mr. Sajeve Deora or any other person/s who wish to continue as Promoter of the Company, and would request the Company to re-classify my status from "Promoter & Promoter Group" to Public Category".

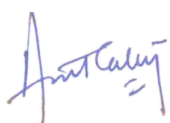
In this regard, I confirm and undertake as follows:

- a) I do not hold more than 10% (ten percent) of the total voting rights in the Company;
- b) I do not exercise control over the affairs of the Company, whether directly or indirectly;
- c) I do not have any special rights with respect to the Company through formal or informal arrangements, including through any shareholder agreements;
- d) I am not represented on the Board of Directors of the Company, either by myself or through a nominee director;
- e) I am not acting as a key managerial personnel in the Company;
- f) I am not a 'wilful defaulter' as per the Reserve Bank of India guidelines; and
- g) I am not a fugitive economic offender.

I understand that similar applications are being made by Mr. Brijinder Bhushan Deora, Mrs. Jai Rani Deora, Mr. Rajeev Kumar Deora and Mr. Arun Deora who also held equity shares in Deora Associates Private Limited (Since Dissolved) and were also classified as Promoters of the Company in the same circumstances as mentioned above. I am given to understand that the aforementioned persons may also file an application seeking reclassification from "Promoter & Promoter Group" to "Public", which action will be their independent action.

In view of the above, I hereby seek that my status in the Company be reclassified from "Promoter & Promoter Group" to "Public" and I further request the Company to initiate required action/s in terms of Regulation 31A of the Listing Regulations and to make necessary application to the Stock Exchange for reclassification of my status in the Company within the time stipulated thereunder.

Thanking you,  
Yours faithfully,



Ambarish Chatterjee  
A-395, Noida, Uttar Pradesh  
201301  
Mobile No: +919811903457  
Email: a chatterjee.cs@gmail.com

Date: 21.06.2020

The Board of Directors  
**Integrated Capital Services Limited**  
606 New Delhi House  
27 Barakhamba Road  
New Delhi 110 001.

**Sub: Application for reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulation).**

Dear Sir,

I, Rajeev Kumar Deora, s/o Mr. Brijinder Bhushan Deora, r/o 10, Shipway, Marsfield, NSW 2122, Australia, am presently holding 23,98,550 fully paid-up equity shares of a nominal value of Re. 1.00 each of Integrated Capital Services Limited (Scrip Code:539149), the Company, which constitutes 6.74% of the total issued paid up share capital of the Company.

It is informed that by virtue of the fact that I was a shareholder of Deora Associates Private Limited (Since Dissolved), the Holding Company of the Company, and that the former had merged with Integrated Capital Services Limited (Transferee Company) in terms of approval of the Scheme of Merger by the Hon'ble National Company Law Tribunal, New Delhi, vide its Order dated September 26, 2018, I was classified as a Promoter of the Company. In terms of the aforesaid Scheme, 2,50,41,000 Equity Shares of Re. 1.00 each held by Deora Associates Private Limited (Since Dissolved) in the Company were cancelled and 2,44,75,000 fully paid up equity shares of the Company were issued to the erstwhile shareholders of Deora Associates Private Limited (Since Dissolved) in the share exchange ratio stated in the aforesaid Scheme. The Appointed Date of the Scheme was October 01, 2016 and the shares of the Company were allotted after due approvals and permissions, including from BSE, and the shares issued on stock swap were listed for trading on BSE.

As mentioned above, it was in the circumstances as explained that I and all other shareholders of Deora Associates Private Limited (Since Dissolved) were categorised as Promoters of Integrated Capital Services Limited, the Company. I was issued 23,98,550 fully paid equity shares of the Company, constituting 6.74% of the total issued and paid up share capital of the Company.

It is mentioned that, I am Non-Resident Indian, permanently settled in Australia and I am not connected, directly or indirectly, in any manner whatsoever, with any activity of the Company and do not have any direct or indirect control over the affairs or the decision making process of the Company. I am not dependent, either financially or otherwise, for my life and living on Mr. Sajeve Deora or any other person/s who wish to continue as Promoter of the Company, and would request the Company to re-classify my status from "Promoter & Promoter Group" to Public Category".

In this regard, I confirm and undertake as follows:

- a) I do not hold more than 10% (ten percent) of the total voting rights in the Company;
- b) I do not exercise control over the affairs of the Company, whether directly or indirectly;
- c) I do not have any special rights with respect to the Company through formal or informal arrangements, including through any shareholder agreements;
- d) I am not represented on the Board of Directors of the Company, either by myself or through a nominee director;
- e) I am not acting as a key managerial personnel in the Company;
- f) I am not a 'wilful defaulter' as per the Reserve Bank of India guidelines; and



g) I am not a fugitive economic offender.

I understand that similar applications are being made by Mr. Brijinder Bhushan Deora, Mrs. Jai Rani Deora, Mr. Arun Deora and Mr. Ambarish Chatterjee who also held equity shares in Deora Associates Private Limited (Since Dissolved) and were also classified as Promoters of the Company in the same circumstances as mentioned above. I wish to place on record that Mr. Brijinder Bhushan Deora, Mr. Arun Deora, Mrs. Jai Rani Deora are my immediate relatives as per section 2(pp)(ii) of Securities And Exchange Board of India (Issue of Capital And Disclosure Requirements) Regulations, 2018. I am filing this request / application in my own right and independent of any other shareholder of the Company. I am given to understand that the aforementioned persons may also file an application seeking reclassification from "Promoter & Promoter Group" to "Public", which action will be their independent action.

In view of the above, I hereby seek that my status in the Company be reclassified from "Promoter & Promoter Group" to "Public" and I further request the Company to initiate required action/s in terms of Regulation 31A of the Listing Regulations and to make necessary application to the Stock Exchange for reclassification of my status in the Company within the time stipulated thereunder.

Thanking you,

Yours faithfully,

*Rajeev Deora*

**Rajeev Kumar Deora**  
**10, Shipway Street, Marsfield**  
**NSW 2122 (Australia)**  
**Mobile No: +61422982432**  
**Email: rajeev.deora61@gmail.com**