

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

Company Code: 532710 (BSE)

NSE Symbol: SADBHAV (NSE)

Dear Sir/ Madam,

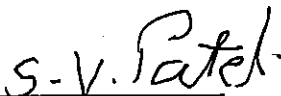
**Sub: Disclosure in terms of Regulation 31(1) read with Regulation 28(3) SEBI
(Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

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.

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 14.06.2019)	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)
Amount 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/-
Ratio of A / B		0.46	0.21	0.23	0.73	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. 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)
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/-
Ratio of A / B		0.45	0.48	0.24	0.05	0.56
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. 7,04,89,609/- (as on 19.07.2019)	Rs. 11,85,75,000/- (as on 26.02.2020)
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/-
Ratio of A / B		0.75	0.016	0.66	0.28	0.51
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. 13,22,30,450/- (as on 20.01.2020)	Rs. 3,80,30,500/- (as on 25.07.2019)	Rs. 56,17,11,875/- (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)
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/-
Ratio of A / B		0.66	0.26	5.15	0.38	0.11
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)
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/-
Ratio of A / B		0.28	0.07	2.87	0.11	0.47
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. 31,380,000/- (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 on 09.03.2020)	Rs. 1,68,81,799/- (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. 5,62,08,769/- (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)	Rs. 40,85,25,000/- (as on 30.03.2021)
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. 50,00,00,000/-
Ratio of A / B		0.28	0.32	0.29	0.16	0.82
Value of shares on the date of event / agreement (A)		Rs. 5,608,997/- (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. 14,666,748/- (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. 14,79,86,58/- (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. 1,90,72,500/- (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. 8,64,80,883/- (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	No	No	Yes	No	No
	(b) For the benefit of listed company	No	No	No	No	Yes
	Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.	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
	(a) Any other reason (please specify)	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.

S-V. Patel

Shantaben V. Patel
Promoter of the Company

Date: 01.04.2021
Place: Ahmedabad

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 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	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	

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 30.03.2021	15,10,283	31,83,333
	Total % of Shares encumbered as on date 30.3.2021	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

SVP

	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. 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)	
	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/-	
Ratio of A / B		0.31		
End use of money	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

S V Patel

Shashin V. Patel
Promoter Group

Date: 01.04.2021
Place: Ahmedabad

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

Date: 01/04/2021

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,

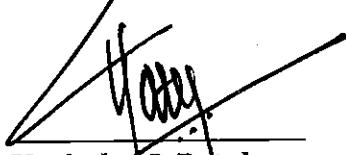
**Sub: Disclosure in terms of Regulation 31(1) read with Regulation 28(3) SEBI
(Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

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)

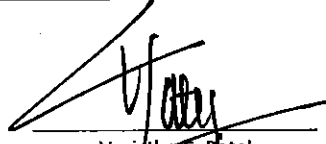
Name of listed company	Sadbhav Engineering Limited	
Name of the recognised stock exchanges where the shares of the company are listed	<ul style="list-style-type: none"> • BSE Limited • National Stock Exchange of India Limited 	
Name of the promoter(s) / PACs whose shares have been encumbered	Mr. Vasistha 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	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	

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 30.03.2021		23,31,000	10,91,451
Total % of Shares encumbered as on date 30.03.2021		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
	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: 01.04.2021
Place: Ahmedabad


Vasishtha L. Patel
Promoter Group