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,

S-V. Seitel.

Shantaben V. Patel Promoter

Annexure II	

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

ame of listed company	Sadbhav Engineering Limited		
Name of herecognised stock exchanges where the shares of the company are listed	BSE Limited National Stock Exchange	of India Limited	
Name of the recognised stock exchanges where the shares of the terminary are shares of the promoter(s) / PACs whose shares have been encumbered	Mr. Shantaben V. Patel		
Name of the promoter(s) / PACs whose shares have been encompered	No. of shares	8.01,94,394	
Total promoter shareholding in the listed company	% of total share capital	46.74% of total share capital	Section and
Encumbered shares as a % of promoter shareholding	58.03%		Constant and the second second
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: 07,02,2019 & Additional encumbrance: 04,04-2019, 19,07,2013,01.08,2019,20.01,2020, 19,02,2020,09.03,2020, 11,03,2020,200,33,2020,03,04-2020)	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 & 02.03.2020,90.03.2020, 11.03.2020)	Encumbrance 3 (Date of reaction of encumbrance: 29,01,2019 & Additional encumbrance; 14,02,2019,31,07,2019, 01.08,2019, 23,01,2020,04,02,2020,14,02,2020, 18,02,2020,19,02,2020,03,03,2020, 09,03,2020,11,03,2020,14,03,2020)	Encumbrance 4 (Date of creation of encumbrance: 23.03.2019 & Additional encumbrance: 04.04.2019.11.07.2019, 19.07.2019, 05.08.2019, 20.02.2020,09.03.2020, 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, 20.03.20220)	Encumbrance 6 (Date of creation of encumbrance: 15.11.2019 & Additional encumbrance: 14.02.2020, 15.02.2020, 24.02.2020, 27.02.2020, 13.11.2020) Pledge	Encumbrance 7 (Date of creation of encumbra 31.01.2020 & 01.02.2021) Piedge
Type of encumbrance (piedge, 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		4300000 (dated 31.01.2020)
	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 51.01.2020)
and % of shares encumbered								2.51% of total share capital
	% 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 01.0
	% 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)	
		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	
	% of total share capital			540000 (dated 01.08.2019)	393214 (dated 19.07.2019)	1500000 (dated 26.02.2020)	1000000 (dated 24.02.2020)	
	No. of shares	1136350 (dated 01.08.2019)	14205 (Released date 23.07.2019)		Sourcesoff, and an end of the	0.87% of total share capital	0.58% of total share capital	
	% 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			
	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)		
		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	-	-
	% of total share capital		534141 (dated 27.02.2019)	313000 (dated 14.02.2020)	1000000 (dated 22.05.2020)			
	No. of shares	1111944 (dated 11.03.2020)		0.18% of total share capital	0,58% of total share capital			
	% of total share capital	0.65% of total share capital	0.31% of total share capital		500000 (dated 27.05.2020)			
	No. of shares	1109594 (dated 11.03.2020)	389179 (dated 02.03.2019)	450000 (dated 18.02.2020)	151			
	% 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				
		750000 (dated 03.04.2020)		493182 (dated 09.03.2020)	1			
	No. of shares			0.29% of total share capital				
	% of total share capital	0.44% of total share capital		1315151 (dated 11.03.2020)				
	No. of shares							
	% of total share capital			0.77% of total share capital				
				1000000 (dated 18.03.2020)				
				0.58% of total share capital	— —	_		
					_			
	Total No. of Shares Pledged	9435310	2956007	8233333	5426947	10270270	0	0%
	as on 03.02.2021 Total % of Shares	5.50%	1.72%	4.80%	3.16%	5.99%	0.00%	0.00%
	encumbered as on date 03.02.2021	1999/00/04/						

	Name of the entity in whose favour shares encumbered (X)		ditya Birla Finance Ltd.	Axis Finance Ltd.	Tata Capital Financial Services Ltd.	RBL Bank Ltd.	STCI Finance Ltd,	Clix Finance Ltd.	SREI Equipment Finance Ltd.
			es	Yes	Yes	Yes	Yes	Yes	Yes
	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.	1237.110							
			isted company and its group	Listed company and its group companies (if	Listed company and its group companies (if	Listed company and its group	cipeen countratif and been	Listed company and its group companies (if any) -	Listed company and its group companies (if any) -
	Names of all other entities in the agreement		ompanies (if any) -	any) - 1. Axis Finance Ltd.	any) - 1. Tata Financial Services Ltd.	companies (if any) - 1. RBL Bank Ltd.	companies (if any) - 1. STCI Finance Ltd.	1. Clix Finance India Pvt. Ltd.	1. SREI Equipment Finance Ltd.
					Other entities (if	Other entities (if	Other entities (if	Other entities (if	Other entities (if
				Other entities (if any) 1. Mr. Vikram R. Patel		1. Mr. Shashin V. Patel 2. Mr. Vikram R. Patel 3.Mr. Vasistha C. Patel	1. Sadbhav Engineering Limited	1. Sadbhav Infrastructure Project Limited	1. Sadbhav Engineering Limited
								No	No
	Whether the encumbrance is relating to any debt instruments viz. debenture,	YES / NO (If Yes,)	No	No	No	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	-	- 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	Rs. 43,67,30,000/-{as on	Rs. 86,80,34,634/-(as on 15.11.2019)	Rs. 55,72,80,000/-{as on 31.03
Asset	Value of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date	Rs. 5,17,22,335/-(as on 07.02.2019)	The ar of propose the difference of		29.03.2019)	29.01.2020)		
		of pledge.		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/-
	Amount involved (against which shares have been encumbered) (B)		Rs. 20,00,00,000/- 0.26	4 54	1.70	1.11 Rs. 18,34,87,500/-(as on	2.11 Rs. 2.26.29.750/-(as on 04.02.2020)	2.48 Rs. 3,99,00,000/-{as on 14.02.2020}	Rs. 26,31,60,000/-(as on 02.0
	Ratio of A / B 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)	R5. 18,54,87,500/-(as on 04,04.2019)	(k. 2,20,23,730) (230) (030) (020)		
	1.493		Rs. 20,00.00,000/-	Rs. 6,03,00,000/-	Rs. 10.35,00,000/-	Rs.25,00,00,000	Rs.23.00.00.000/-	Rs.35,00,00,000/-	Rs.130,00,00,000/- 0.20
	Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A)	Value based on closing price of	0.46 Rs. 8,96,25,000/-{as on 19.07.2019}	6.21 Rs. 2,92,23,480/-(as on 17.07.2019)	0.23 Rs. 2,59,92,500/-(as on 31.07.2019)	0.73 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}	
	value of shares on the date of elenery ego and the training of	either NSE or BSE as on date of pledge.					Rs.23.00,00.000/-	Rs.35,00,00,000/-	
	Amount involved (against which shares have been encumbered) (B)	or preuge.	Rs. 20,00,00,000/-	Rs. 6.03,00.000/-	Rs. 10,85,00,000/- 0.24	Rs.25,00,00,000 0.06	0.56	0.33 Rs. 7,96,00,000/-(as on 24.02.2020)	
	Ratio of A / B Value of shares on the date of event / agreement (A)	Value based on closing price o 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. 20,00,00,000/-	Rs. 14,67,00,000/-	Rs. 10,85,00,000/-	Rs.25,00,000,000 0.28	Rs.23,00,00,000/-	Rs.35,00,00,000/- 0.22	
	Amount involved (against which shares have been encumbered) (B) Ratio of A / B		0.75	0.016 Rs. 3,30,30,500/-(as on 25.07.2019)	0.66 Rs. 36,17,11,875/-(as on 23.01.2020)	Rs. 9,55,46,875/-(as on	Rs. 2,59,40,000/-(as on 03.03.2020	Rs. 74,63,13,620/-(as on 27.02.2020)	-
	Value of shares on the date of event / agreement (A)	Value based on closing price o either NSE or BSE as on date of pledge.	f Rs. 13,22,50,450/-(as on 20.01.2020)			05.08.2019)	Rs.23,00,00,000/-	Rs.35.00.00.000/-	
	Amount involved (against which shares have been encumbered) (B)	of predger	Rs. 20,00,00,000/-	Rs. 14,67,00,000/- 0.26	Rs. 10,85,00,000/- 3.35	Rs.25.00,00,000 0.38	0.11	2.13	
	Ratio of A / B Value of shares on the date of event / agreement (A)	Value based on closing price of either NSE or BSE as on date	0.66 f 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)	
		of pledge.	Rs. 20,00,00,000/-	Rs. 14,67,00,000/-	Rs. 10,35,00,000/-	Rs.25,00,00,000	Rs.23,00,00,000/-	Rs.35.00.00,000/- 0.01	
	Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A)	Value based on closing price of	0.28 f Rs.31380000/-(as on 09.03.2020)	0.07 Rs. 7,00,16,500/-{Released as on 06.02.2020	2.37 Rs. 4,64,20,000/-{as on 04.02.2020}	0.11 Rs. 2,44,34,665/-{as on 09.03.2020}	0.47 Rs. 1,68,81,739/-(as on 20.03.2020		
		either NSE or BSE as on date of piedge.		Pr 12 67.00 000/-	Rs. 10,85,00,000/-	Rs.25,00,00,000	Rs.19,00,00,000/-		
	Amount involved (against which shares have been encumbered) (B) Ratio of A / B		Rs. 20,00,00,000/- 0.16	Rs. 12,67,00,000/- 0.55	0,43 Rs. 3,12,21,750/-(as on 14.02.2020)	0.10 Rs. 3,96,00,000/- (As on	0.09		
			Rs.56208769/-(as on 11.03.2020)	Rs. 4,07,01,544/-(as on 27.02.2020)	ns. 5,12,21,750/-(85 011 14.02.2020)	22.05.2020)			
	Value of shares on the date of event / agreement (A)				the second se				
	Value of shares on the date of event / agreement (A)		R5. 20,00,00.000/-	Rs. 12,67,00,000/-	Rs. 10.85.00,000/-	Rs.25,00,00,000 0.16			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A)		Rs. 20,00,00.000/- 0.28 Rs.56089977/-(as on 11.03,2020)	Rs. 12.67.00.000/- 0.32 Rs. 2,63,27,959/-(as on 02.03.2020)	Rs. 10.85,00,000/- 0.29 Rs. 4,03,42,500/-(as on 18.02.2020)	0.16 Rs. 1.98.25.000/- (As on 27.05.2020)			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Batio of A / B Value of shares on the date of event / agreement (A)		0.28 Rs.56039977/-(as on 11.03.2020) Rs. 20.00.00.000/-	0.32 Rs. 2,53,27,959/-(as on 02.03.2020) Rs. 12,67,00,000/-	0.29 Rs. 4,03,42,500/-(as on 18.02.2020) Rs. 10,85,00.000/-	0.16 Rs. 1.98.25.000/- (As on 27.05.2020) Rs.25.00,00.000			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B		0.28 Rs.56059977/-(as on 11.03.2020) Rs. 20.00.00.000/- 0.28	0.32 Rs. 2,63,27,959/-(as on 02.03.2020)	0.29 Rs. 4,03,42,500/-(as on 18.02.2020) Rs. 10,85,00,000/- 0.37 Rs. 6,31,21.750/-(as on 19.02.2020)	0.16 Rs. 1.98.25.000/- (As on 27.05.2020)			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A)		0.28 Rs.56089977/-(as on 11.03.2020) Rs. 20.00.00.000/- 0.28 Rs.14666748/-(as on 20.03.2020) Rs. 20.00.00.000/-	0.32 Rs. 12,67,00.000/- 0.21 Rs. 12,67,00.000/- 0.21 Rs. 12,67,00.000/- Rs. 12,67,00.000/- Rs. 12,67,00.000/-	0.29 Rs. 4,03,42,500/-(as on 18.02.2020) Rs. 10,85,00.000/- 0.37 Rs. 6,31,21,750/-(as on 19.02.2020) Rs. 10,85,00.000/-	0.16 Rs. 1.98.25.000/- (As on 27.05.2020) Rs.25.00,00.000			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B		0.28 Rs.56089977/-(as on 11.03.2020) Rs. 20.00.00.000/- 0.28 Rs.14665748/-(as on 20.03.2020) Rs. 20.00.00.000/- 0.07	0.32 Rs. 2,63,27,959/-(as on 02.03.2020) Rs. 12,67,00,000/- 0.21 Rs. 1,78,03,150/-(as on 09.03.2020) Rs. 12,87,00,000/- 0.22	0.29 Rs. 40,342,500/-(as on 18.02.2020) Rs. 10,85,00,000/- 0.37 Rs. 63,312,1750/-(as on 19.02.2020) Rs. 10,85,00,000/- 0.58 Rs. 53,23,4750/-(as on 02.03.2020)	0.16 Rs. 1.98.25.000/- (As on 27.05.2020) Rs.25.00,00.000			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Batio of A / 8 Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Batio of A / 8 Value of shares on the date of event / agreement (A) Value of shares have been encumbered) (B) Batio of A / 8 Comparison o		0.28 Rs.56059977/4sc on 11.03.2020) Rs.20,000,000/- 0.28 Rs.1565738/4sc on 20.03.2020) Rs.20,00.00,000/- 0.07 Rs.14736558/4sc on 20.03.2020) Rs.20,00.00,000/- Rs.20,00.00,000/-	0.32 Rs. 2,53,27,959/-(as on 02.03.2020) Rs. 12,67,00,000/- 0.21 Rs. 12,67,00,000/- 0.22 Rs. 12,67,00,000/- 0.22 Rs. 38,16,233/-(as on 11.03.2020) Rs. 12,67,00,000/-	0.29 Rs. 4,03,42,500/-(as on 18.02.2020) Rs. 10,85,00.000/- 0.37 Rs. 6,31,21,750/-(as on 19.02.2020) Rs. 10,85,00,000/- 0.58 Rs. 5,32,34,750/-(as on 03.03.2020) Rs. 10,85,00,000/-	0.16 Rs. 1.98.25.000/- (As on 27.05.2020) Rs.25.00,00.000			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B		0.28 Rs.56089977/4s on 11.03.2020) Rs. 20.00.00.000/- 0.28 Rs.14665748/4s on 20.03.2020) Rs.00.00.000/- 0.07 Rs.14738558/4s on 20.03.2020) Rs.20.00.00.000/- 0.07	0.32 Rs. 2,53,27,959/-(as on 02.03.2020) Rs. 12,67.00.000/- (0.21 Rs. 12,67.00.000/- 0,22 Rs. 12,803,150/-(as on 09.03.2020) Rs. 12,87.00.000/- 0,22 Rs. 3,88,16,233/-(as on 11.03.2020)	0.29 Rs. 4,03,42,500/-(as on 18.02.2020) Rs. 10,85,00.000/- 0.37 Rs. 6,31,21,750/-(as on 19.02.2020) Rs. 10,85,00,000/- 0.58 Rs. 5,22,34,750/-(as on 03.03.2020) Rs. 10,85,00,000/- 0,49 Rs. 2,57,94,113/-(as on 09.03.2020)	0.16 Rs. 1.98.25.000/- (As on 27.05.2020) Rs.25.00,00.000			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A)		0.28 Rs.56039977/4as on 11.03.2020) Rs.20.00.00.00/- 0.28 Rs.14666748/-(as on 20.03.2020) Rs.20.00.00.00/- 0.07 Rs.1735558/4as on 20.03.2020) Rs.20.00.00.00/- 0.07 Rs.1072500/-(as on 20.04.2020) Rs.20.00.00.00/-	0.32 Rs. 2,53,27,959/-(as on 02.03.2020) Rs. 12,67,00,000/- 0.21 Rs. 12,67,00,000/- 0.22 Rs. 12,67,00,000/- 0.22 Rs. 38,16,233/-(as on 11.03.2020) Rs. 12,67,00,000/-	0.29 Rs. 4,03,42,500/-(as on 18.02.2020) Rs. 10.85,00,000/- 0.37 Rs. 6,31,21,750/-(as on 19.02.2020) Rs. 10,85,00,000/- 0.58 Rs. 5,32,34,759/-(as on 03.03.2020) Rs. 10,85,00,000/- Rs. 10,85,00,000/- Rs. 10,85,00,000/-	0.16 Rs. 1.98.25.000/- (As on 27.05.2020) Rs.25.00,00.000			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Value of shares on the date of event / agreement (A) Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B		0.28 Rs_56059977/4as on 11.03.2020) Rs_20.00.00.00/- 0.28 Rs_1465748/4as on 20.03.2020) Rs_270.00.000/- 0.07 Rs_1473855/-(as on 20.03.2020) Rs_20.00.000/- 0.07 Rs_20.00.000/- 0.07 Rs_20.00.000/- 0.07	0.32 Rs. 2,53,27,959/-(as on 02.03.2020) Rs. 12,67,00,000/- 0.21 Rs. 12,67,00,000/- 0.22 Rs. 12,67,00,000/- 0.22 Rs. 38,16,233/-(as on 11.03.2020) Rs. 12,67,00,000/-	0.29 Rs.4,03,42,500/-(as on 18.02.2020) Rs.10.85,00.000/- 0.37 Rs.6,31,21.750/-(as on 19.02.2020) Rs.10.85,00.000/- 0.58 Rs.5,32,34,750/-(as on 0.3.3.2020) Rs.10.85,00.000/- 0.49 Rs.10.85,00.000/- 0.23 Rs.5,64,00.883/-(as on 11.03.2020)	0.16 Rs. 1.98.25.000/- (As on 27.05.2020) Rs.25.00,00.000			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / 3 Value of shares on the date of event / agreement (A) Value of shares on the date of event / agreement (A) Value of shares on the date of event / agreement (A) Value of shares on the date of event / agreement (A) Value of shares on the date of event / agreement (A)		0.28 Rs.56039977/4as on 11.03.2020) Rs.20.00.00.00/- 0.28 Rs.14666748/-(as on 20.03.2020) Rs.20.00.00.00/- 0.07 Rs.1735558/4as on 20.03.2020) Rs.20.00.00.00/- 0.07 Rs.1072500/-(as on 20.04.2020) Rs.20.00.00.00/-	0.32 Rs. 2,53,27,959/-(as on 02.03.2020) Rs. 12,67,00,000/- 0.21 Rs. 12,67,00,000/- 0.22 Rs. 12,67,00,000/- 0.22 Rs. 38,16,233/-(as on 11.03.2020) Rs. 12,67,00,000/-	0.29 Rs. 403.42,500/-(as on 18.02.2020) Rs. 10,85,00.000/- 0.37 Rs. 6.31,21,750/-(as on 19.02.2020) Rs. 10,85,00.000/- 0.58 Rs. 5,32,34,750/-(as on 03.03.2020) Rs. 10,85,00.000/- 0.29 Rs. 10,85,00.000/- 0.23 Rs. 6,64,80,883/-(as on 11.03.2020) Rs. 10,85,00.00/- 0.23	0.16 Rs. 1.98.25.000/- (As on 27.05.2020) Rs.25.00,00.000			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Amount involved (against which shares have been encumbered) (B) Ratio of A / B Amount involved (against which shares have been encumbered) (B) Ratio of A / B Amount involved (against which shares have been encumbered) (B) Ratio of A / B Amount involved (against which shares have been encumbered) (B) Ratio of A / B Amount involved (against which shares have been encumbered) (B) Ratio of A / B Amount involved (Bainst which shares have been encumbered) (B) Amount involved (Bainst which shares have been encumbered) (B) Ratio of A / B Amount involved (Bainst which shares have been encumbered) (B) Amount involved Bainst which shares have been encumbered) (B) Amount involved Bainst which shares have been encumbered) (B) Amount involved Bainst which shares have been encumbered) (B) Amount involved Bainst which shares have been encumbered) (B) Amount involved Bainst which shares have been encumbered) (B) Amount involved Bainst which shares have been encumbered) (B) Amount involved Bainst which shares have been encumbered) (B) Amount involved Bainst which shares have been encumbered) (B) Amount involved Bainst whic		0.28 Rs.56039977/4as on 11.03.2020) Rs.20.00.00.00/- 0.28 Rs.14666748/-(as on 20.03.2020) Rs.20.00.00.00/- 0.07 Rs.1735558/4as on 20.03.2020) Rs.20.00.00.00/- 0.07 Rs.1072500/-(as on 20.04.2020) Rs.20.00.00.00/-	0.32 Rs. 2,53,27,959/-(as on 02.03.2020) Rs. 12,67,00,000/- 0.21 Rs. 12,67,00,000/- 0.22 Rs. 12,67,00,000/- 0.22 Rs. 38,16,233/-(as on 11.03.2020) Rs. 12,67,00,000/-	0.29 Rs. 4,03,42,500/-(as on 18.02.2020) Rs. 10,85,00,000/- 0.37 Rs. 6,31,21,750/-(as on 19.02.2020) Rs. 10,85,00,000/- 0.58 Rs. 5,32,34,759/-(as on 19.02.2020) Rs. 10,85,00,000/- 0.49 Rs. 10,85,00,000/- 0.43 Rs. 6,64,80,883/-(as on 10.03.2020) Rs. 10,85,00,000/- 0.23 Rs. 6,64,80,883/-(as on 11.03.2020) Rs. 15,55,0000/- 0.61 Rs. 15,55,0000/- (as on 11.03.2020)	0.16 Rs. 1.98.25.000/- (As on 27.05.2020) Rs.25.00,00.000			
	Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B		0.28 Rs.56039977/4as on 11.03.2020) Rs.20.00.00.00/- 0.28 Rs.14666748/-(as on 20.03.2020) Rs.20.00.00.00/- 0.07 Rs.1735558/4as on 20.03.2020) Rs.20.00.00.00/- 0.07 Rs.1072500/-(as on 20.04.2020) Rs.20.00.00.00/-	0.32 Rs. 2,53,27,959/-(as on 02.03.2020) Rs. 12,67,00,000/- 0.21 Rs. 12,67,00,000/- 0.22 Rs. 12,67,00,000/- 0.22 Rs. 38,16,233/-(as on 11.03.2020) Rs. 12,67,00,000/-	0.29 Rs. 4,03,42,500/-(as on 18.02.2020) Rs. 10.85,00.000/- 0.37 Rs. 6,31,21,750/-(as on 19.02.2020) Rs. 10,85,00,000/- 0.58 Rs. 5,32,34,750/-(as on 02.03.2020) Rs. 10.85,00,000/- 0.49 Rs. 2,57,93,418/-(as on 09.03.2020) Rs. 10,85,00,000/- 0.23 Rs. 6,64,80,083/-(as on 11.03.2020) Rs. 10,85,00,000/- 0.61	0.16 Rs. 1.98.25.000/- (As on 27.05.2020) Rs.25.00,00.000			

				Yes	No	No	Vas	Yes
of money	Borrowed amount to be utilized for what purpose -	No	No	No	No	Yes	As per Sanction Letter	As per Sanction Letter
	(a) Personal use by promoters and PACs	No	As per Sanction Letter of third party	As per Sanction Letter	As per Sanction Letter of third	AS DEL SULICION ESTER	25//65/32313/2001/27/909984/2002/20	
(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)	(b) For the benefit of listed company	As per Sanction Letter of third party	As per sentenen senten et al.		Security for third party	Borrowing by Sadbhav Engineering	Borrowing by Sadbhav Infrastructure	Additional Security given by for Borrowing in the Sa
	Security for third party	Security for third party	Personal Use	Contraction of the provide strength of the	structured aladap of Equity share	s Project Limited and pledge of Equity rt shares of Sadbhav Engineering Ltd. as part of Sanction Letter.		
						1		

~ S-V. Partel. Shantaben V. Patel omoter of the Company

Date: 4-02-2021 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

Annexure II

Disclosure of reasons for encumbrance

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 Indi	a 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
iotal promotel shareholding in the noted company	% 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	

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

Details of all the existing events/ agreements pertaining to encumbrance

			Encumbrance 1	
			(Date of creation of encumbrance: 19.11.2019,	Encumbrance 2
			Additional encumbrance: 14.02.2020,	(Date of creation of
			20.02.2020, 28.02.2020, 09.03.2020)	encumbrance: 14.09.2020
vne of encumbrance ((pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant,		Pledge	Pledge
ansaction, condition	or arrangement in the nature of encumbrance)			
o. and % of shares en	ncumbered	No. of shares	2,04,050	31,83,333
o, and to of phares en		% 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	<u> </u>
		% 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	15,10,283	31,83,333
		date 03.02.2021		· · · · · · · · · · · · · · · · · · ·
		Total % of Shares encumbered as on date	0.88%	1.85%
		03.02.2021		
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,	YES / NO	Yes	Yes
	NBFC or housing finance company? If No, provide the nature of the business of the			
	entity.			
	Names of all other entities in the agreement		Listed company and its group companies (if	Listed company and its group
	Names of all other endlies in the agreement		any) -	companies (if any) -
			1. RBL Bank Ltd.	1. Gayi Adi Management An
				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
ver	Amount involved (against which shares have been encumbered) (B)		Rs. 9,00,00,000/-	Rs. 5,00,00,000/-
	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/-	
			0.10	
	Ratio of A / B 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	<u></u>
	Borrowed amount to be utilized for what purpose –			
d use of money	(a) Personal use by promoters and PACs		Yes. Purpose - Repayment of existing debts	Yes. Purpose - Repayment of existing debts
			No	No
	(b) For the benefit of listed company			
	Provide details including amount, purpose of raising money by listed company, (a) Any other reason (please specify)		No	No

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Shashin V. Patel Promoter Group

Date: 04-02-2021 Place: Ahmedabad

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

Date: February**0**, 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

Annexure II

Disclosure of reasons for encumbrance

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

		And		
	Sadbhav Engineering Limite	d		
e of listed company he of the recognised stock exchanges where the shares of the company are listed	BSE Limited			
lame of the recognised stock exchanges where the sheres of the second party	National Stock Exchange of India Limited			
Name of the promoter(s) / PACs whose shares have been encumbered	Mr. Vasistha C. Patel			
lame of the promoter(s) / PACs whose shares have been ended to be	No. of shares	8,01,94,394		
Total promoter shareholding in the listed company	% of total share capital	46.74% of total share capital		
Let use a set of promotor charabolding	58.03%			
ncumbered shares as a % of promoter shareholding Whether encumbered share is 50% or more of promoter shareholding	YES			
Whether encumbered share is 50% of more of total share capital Whether encumbered share is 20% or more of total share capital	YES	and the second		
Whether encumbered share is 20% or more of total plan prop				

Details of all the exi	isting 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 (transaction, condition o	pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, or arrangement in the nature of encumbrance)			Pledge
No. and % of shares en	cumbered	% of total share capital No. of shares % of total share capital No. of shares % of total share capital No. of shares % of total share capital % of total share capital	2,75,000 0.16% of total share capital 7,00,000 0.41% of total share capital 6,06,000 0.35% of total share capital 7,50,000 0.44% of total share capital 23,31,000	1,75,000 0.10% of total share capital 3,34,692 0.20% of total share capital 1,14,500 0.07% of total share capital 4,67,259 0.27% of total share Capital 10,91,451 0.64%
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X) 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	Aditya Birla Finance Limited Yes	RBL Bank Ltd. 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,	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 based on closing price of	f Rs. 2,97,00,000/- (As on 12.02.2020)	Rs. 1,74,56,250/- (As on 15.02.2020)
urity Cover / Asse	t Value of shares on the date of event / agreement (A)	either NSE or BSE as on date of		
over		pledge.	`	
		piedge.	Rs. 10,00,00,000/-	Rs. 8,00,00,000/-
	Amount involved (against which shares have been encumbered) (B)		0.30	0.22
	Ratio of A / B	Velue beach on clocing price of	of Rs. 5,70,50,000/- (As on 19.02.2020)	Rs. 2,61,39,445/- (As on 25.02.2020)
	Value of shares on the date of event / agreement (A)	either NSE or BSE as on date o		
		pledge.	Rs. 10.00,00,000/-	Rs. 8,00,00,000/-
	Amount involved (against which shares have been encumbered) (B)		0.57	0.33
	Ratio of A / B		of Rs. 4,09,95,900/- (As on 03.03.2020)	Rs. 77,45,925/- (As on 03.03.2020)
	Value of shares on the date of event / agreement (A)			
		either NSE or BSE as on date o		
		pledge.	Rs. 10,00,00,000/-	Rs. 8,00,00,000/-
	Amount involved (against which shares have been encumbered) (B)		0.41	0.10
	Ratio of A / B		of Rs. 1,90,87,500/- (As on 03.04.2020)	Rs. 2,44,37,646/- (As on 09.03.2020)
	Value of shares on the date of event / agreement (A)			
		either NSE or BSE as on date of		
		pledge.	Rs. 10.00.00,000/-	Rs. 8,00,00,000/-
	Amount involved (against which shares have been encumbered) (B)		0.19	0.31
	Ratio of A / B		0.19	
nd use of money	Borrowed amount to be utilized for what purpose			Yes
	(a) Personal use by promoters and PACs		Yes	Purpose - Repayment of Existing Debt
			Purpose - Repayment	No
	(b) For the benefit of listed company		No	
	(b) For the other of nate events of the other of the other o]-	
	schedule for utilization of amount, repayment schedule etc.			
	(a) Any other reason (please specify)		No	No

Vasistha C. Patel Promoter Group

Date: 0ん-0え-2021 Place: Ahmedabad 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

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	BSE Limited				
listed	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		Pledge	Pledge	Pledge
any other covenant, transaction, condition or arrangement in the nature of				
encumbrance)				
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	
	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	12,67,326	5,44,500	2,89,500
		encumbered as on date	12,07,320	3,44,300	2,85,500
		03.02.2021			
		Total % of Shares	0.73%	0.32%	0.17%
		encumbered as on date 03.02.2021			
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,	YES / NO	Yes	Yes	Yes
	public financial institution, NBFC or housing finance				
	company? If No, provide the nature of the business of				
	Names of all other entities in the agreement		Listed company and its group	Listed company and its group	Listed company and its group
			companies (if any) -	companies (if any) -	companies (if any) -
			1. Axis Finance Limited	1. Aditya Birla Finance Limited	
			Other entities (if any)	Other entities (if any)	Other entities (if any)
			1. Mr. Vikram R. Patel	1. Mr. Vikram R. Patel	1. Mr. Vikram R. Patel
	Whether the encumbrance is relating to any debt	YES / NO (if Yes,)	No	No	No
	instruments viz. debenture, commercial paper, certificate	1. Name of Issuer	-	-	-
	of deposit etc.? If yes, provide details about the 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			
			-	-	-
Security Cover / Asset	Value of shares on the date of event / agreement (A)	Value based on closing	Rs. 3,21,61,500/-	Rs. 4,50,12,450/-	Rs. 1,56,88,750/-
Cover		price of either NSE or BSE	(As on 29.06.2017)	(As on 19.12.2019)	(As on 18.02.2020)
		as on date of pledge.			
	Amount involved (against which shares have been		Rs. 6,03,00,000/-	Rs. 10,00,00,000/-	Rs. 8,00,00,000/-
	encumbered) (B)				
	Ratio of A / B		0.53	0.45	0.20
	Value of shares on the date of event / agreement (A)	Value based on closing	Rs. 39,54,750/-	Rs. 1,62,00,000/-	Rs. 71,04,725/-
		price of either NSE or BSE	(As on 22.08.2017)	(As on 12.02.2020)	(As on 05.03.2020)
		as on date of pledge.			
	Amount involved (against which shares have been		Rs. 6,03,00,000/-	Rs. 10,00,00,000/-	Rs. 8,00,00,000/-
	encumbered) (B)		13. 0,03,00,000/-	13. 10,00,00,000/-	113. 0,00,00,0007-
	Ratio of A / B		0.07	0.16	0.09
	Value of shares on the date of event / agreement (A)	Value based on closing	Rs. 93,27,500/-		
		price of either NSE or BSE	(As on 11.12.2017)		
		as on date of pledge.	· · · · ·		
	Amount involved (against which shares have been encumbered) (B)	F'0-'	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	Rs. 38,15,000/-	
value of shares on the date of event / agreement (A)	price of either NSE or BSE	(As on 13.03.2018)	
	as on date of pledge.	(A3 011 13.03.2010)	
A second to selve all families to should be allowed being being	as on aute of preuger	D- C 02 00 000/	
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	Rs. 51,58,500/-	
	price of either NSE or BSE as on date of pledge.	(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	Rs. 25,59,200/-	
	price of either NSE or BSE as on date of pledge.	(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	Rs. 22,40,000/-	
	price of either NSE or BSE as on date of pledge.	(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	Rs. 41,64,690/-	
	price of either NSE or BSE as on date of pledge.	(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	Rs. 24,65,10,000/-	
	price of either NSE or BSE as on date of pledge.	(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		Rs. 6,03,00,000/-	
encumbered) (B)			
Ratio of A / B		0.23	
Value of shares on the date of event / agreement (A)	Value based on closing	Rs. 28,51,80,650/-	
	price of either NSE or BSE as on date of pledge.	(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	Rs. 11,69,29,237/-	
	price of either NSE or BSE as on date of pledge.	(As on 18.06.2019)	
Amount involved (against which shares have been		Rs. 6,03,00,000/-	
encumbered) (B)			
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	Rs. 15,94,72,800/- (As on 28.06.2019)	
	as on date of pledge.		
Amount involved (against which shares have been encumbered) (B)		Rs. 6,03,00,000/-	
	1	2.64	

	Value of shares on the date of event / agreement (A)	Value based on closing	Rs. 3,82,27,640/-		
		price of either NSE or BSE	(As on 23.07.2019)		
Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B Value of shares on the date of event / agreement (A)		as on date of pledge.			
			Rs. 14,67,00,000/-		
	Ratio of A / B		0.26		
	Value based on closing price of either NSE or BSE	Rs. 1,49,75,662/- (As on 30.09.2019)			
			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