

23<sup>rd</sup> December, 2025

**National Stock Exchange**

Exchange Plaza  
Plot No. C/1, G Block,  
Bandra – Kurla Complex,  
Bandra (E), Mumbai – 400051

**(NSE Scrip Code: SPMLINFRA)**

**BSE Limited**

PhirozeJeejeebhoy Tower  
Dalal Street,  
Mumbai – 400 001

**(BSE Scrip Code: 500402)**

**Sub: Disclosure to the Stock Exchanges for Creation of encumbrance over the shares in terms of Regulation 31(2) and 31(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir,

Pursuant to Regulation 31(2) and 31(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, we are in receipt of the disclosure from Niral Enterprises Pvt. Ltd on 23<sup>rd</sup> December, 2025, subsequent to the creation of the encumbrance over the shares of the Company has held by them in favour of SBICAP Trustee Company Ltd on behalf of National Asset Reconstruction Company Limited.

Kindly take the above on record.

Thanking you,  
**For SPML Infra Limited**

Swati  
Agarwal

Digitally signed  
by Swati Agarwal  
Date: 2025.12.23  
14:47:20 +05'30'

**Swati Agarwal**  
**Company Secretary**

Encl.: As Above.

23<sup>rd</sup> December, 2025

**National Stock Exchange**  
Exchange Plaza  
Plot No. C/1. G Block,  
Bandra – Kurla Complex,  
Bandra (E), Mumbai – 400051

**BSE Limited**  
PhirozeJeejeebhoy Tower  
Dalal Street,  
Mumbai – 400 001

**SPML Infra Limited**  
F – 27/2, Okhla Industrial  
Area, Phase II,  
New Delhi - 110020

**(NSE Scrip Code: SPMLINFRA)**

**(BSE Scrip Code: 500402)**

**Sub: Disclosure to the Stock Exchanges and to the Target Company for creation of pledge over the shares of SPML Infra Ltd in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir,

Pursuant to Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, please find enclosed herewith disclosure subsequent to the creation of pledge over the shares of SPML Infra Limited as held by us in the capacity of the Promoter in favor of SBICAP Trustee Company Ltd on behalf of National Asset Reconstruction Company Ltd ("The Lender").

Kindly take the above on record.

Thanking you,

**For Niral Enterprises Pvt Ltd**



**Manoj Kumar Gangwal**  
**Director**  
**DIN: 06659068**



Encl.: As Above.

## Annexure-3

Format for Disclosure by the Promoter(s) to the Stock Exchanges and to the Target Company for encumbrance of shares / Invocation of encumbrance / release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)														SPML Infra Limited	
Names of the Stock Exchanges where the shares of the target company are listed														NSE & BSE	
Date of Reporting														23.12.2025	
Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked														Niral Enterprises Pvt. Ltd	
Details of the creation/invocation/release of encumbrance:														Creation	
Name of the promoter (s) or PACs with him (*)	Promoter holding in the target company (1)			Promoter holding already encumbered (2)			Details of events pertaining to encumbrance (3)							Post event holding of encumbered shares {creation[(2)+(3)]/ release[(2)-(3)]/ invocation[(2)-(3)]}	
	No. of Shares	% of total share capital	% w.r.t. diluted share capital (*)	No. of shares	% of total share capital	Type of event (creation / release/ invocation )	Date of creation / invocation / release of encumbrance	Type of encumbrance (pledge/lien/non disposal undertaking/ others)	Reasons for encumbrances (**) (Creation of Pledge or Release or Invoke of Shares)	No. of shares	% of total share capital	Name of the entity in whose favor shares encumbered (***)	No. of shares	% of total share capital	
SUBHASH CHAND SETHI	1703745	2.26	2.03	1523280	2.13	-	-	-	-	-	-	-	1523280	2.14	
SUSHIL KUMAR SETHI	1345276	1.78	1.60	1334660	1.88	-	-	-	-	-	-	-	1334660	1.88	
PUNAM CHAND SETHI (HUF)	494625	0.66	0.59	-	-	-	-	-	-	-	-	-	-	-	
PUNAM CHAND SETHI	372735	0.49	0.44	-	-	-	-	-	-	-	-	-	-	-	
SUMAN SETHI	183735	0.25	0.22	183735	0.26	-	-	-	-	-	-	-	183735	0.26	
SANDHYA RANI SETHI	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
ABHINANDAN SETHI	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
SUBHASH CHAND SETHI (HUF)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
SUSHIL KUMAR SETHI (HUF)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
ZOOM INDUSTRIAL SERVICES LTD	14596293	19.34	17.36	-	-	-	-	-	-	-	-	-	-	-	
20TH CENTURY ENGINEERING LTD	1000000	1.33	1.19	-	-	-	-	-	-	-	-	-	-	-	
ARIHANT LEASING AND HOLDING LIMITED	436020	0.58	0.52	-	-	-	-	-	-	-	-	-	436020	0.61	
SPML INDIA LIMITED	6182975	8.19	7.91	1780500	2.36	-	-	-	-	-	-	-	1780500	2.36	
NIRAL ENTERPRISES PVT LTD	2630553	3.49	9.03	2076606	2.75	Creation	23.12.2025	Pledge	Pledge as per the MRA Agreement dated 17.05.2024 executed with NARCL ("The Lender")	154,999	0.20	NARCL/SBICAP Trustee Co. Ltd	2231605	2.96	
BHARAT HYDRO POWER CORPORATION LIMITED	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

For Niral Enterprises Pvt Ltd

Director

Manoj Kumar Gangwal

Din: 06659068

Place: Delhi

Date: 23.12.2025

