



Kkalpana Industries (India) Limited

09th September, 2023

To

Corporate Communication Department
BSE Limited
Phiroze Jeejeeboy Towers
Dalal Street, Mumbai – 400 001.

The Secretary
Calcutta Stock Exchange Limited
7, Lyons Range
Kolkata – 700001

BSE Code: 526409

CSE Code: 21028

Dear Sir/ Madam,

Subject: Intimation pursuant to Regulation 31A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('SEBI Listing Regulations')

Ref: Request received for reclassification of shareholding from 'Promoter/Promoter Group' to 'Public' category

Please find attached the request letter dated 09th September, 2023, received from Mrs. Anita Devi Surana forming part of Promoter Group of the company, seeking reclassification of her shareholding and her descendants from 'Promoter Group' category to 'Public' category.

The request for reclassification will be considered by the Board of Directors in accordance with Regulation 31A of the SEBI Listing Regulations.

You are requested to kindly take the above on record.

for Kkalpana Industries (India) Limited

Swati Lodha (ACS: 52755)
Compliance Officer and Company Secretary



09th September, 2023

The Board of Directors,
Kkalpana Industries (India) Limited
BK Market, 16A Shakespeare Sarani
4th Floor, Room No. 3,
Kolkata - 700071

Dear Sir(s)/Madam(s),

Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations & Disclosures Requirements) Regulations (Listing Regulations), 2015

- 1.0 In connection with the captioned matter, I, Anita Devi Surana hereby submit that my husband, Late Surendra Kumar Surana was one of the promoters and/or part of Promoter Group in respect of Kkalpana Industries (India) Limited. He was holding 3505 equity shares in the Company. He died on 24-03-2023. Post his death, the 3505 equity shares have been duly transmitted in my name in my demat account on 03-07-2023 which has subsequently been disposed (sold) off by me.
- 2.0 According to clause (pp) of Sec. 2(1) of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 ('ICDR'), the definition of promoter group also includes an immediate relative of the promoter. The relevant clause reads as under:
- "promoter group" includes:*
- (i) *the promoter;*
 - (ii) *an immediate relative of the promoter (i.e. any spouse of that person, or any parent, brother, sister or child of the person or of the spouse);*
 - (iii) -----
 - (iv) -----
- 3.0 Therefore, by virtue of the definition of "promoter group" under the ICDR, I being spouse of Late Surendra Kumar Surana, and my three daughters (Mrs. Anupama Nahata, Mrs. Meenakshi Bhutoria, and Mrs. Chandana Patwa) automatically became the part of the promoter group.
- 4.0 You would be aware that neither myself nor any of my daughters were involved in the day to day affairs of the Company. We were neither involved in the management of the Company in the past nor do we intend to be involved with the company in any role in the future. Also, neither I nor any of my daughters have ever held any executive or non-executive positions in the Company. You would also appreciate that me and my married daughters are living our lives independently and are not connected, directly or

Anita Devi Surana

indirectly, whatsoever, with any activity of the company. Despite this, we, being the immediate relative of Late Surendra Kumar Surana, are still classified as Promoter group. Now that Late Surendra Kumar Surana has left for his heavenly abode, there is no reason for myself or my daughters to be reflected as Promoter or Promoter Group.

- 5.0 In view of the aforesaid, I, hereby request for reclassification of my status from Promoter Group to Public Category under Sec 31(A)(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations'). In this connection, I hereby confirm and certify that:
- i. Neither I nor any of my three daughters, individually or collectively, hold more than ten percent of the total voting rights in the company.
 - ii. Neither I nor any of my three daughters, individually or collectively, exercise control over the affairs of the company, directly or indirectly.
 - iii. Neither I nor any of my three daughters, have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements.
 - iv. Neither I nor any of my three daughters are being represented on the board of directors (including not having a nominee director) of the Company
 - v. Neither I nor any of my three daughters act as a key managerial person of the Company
 - vi. Neither I nor any of my three daughters are 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
 - vii. Neither I nor any of my three daughters are fugitive economic offender
- 6.0 Further there are no pending regulatory action against me.
- 7.0 I confirm that I would continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 at all times from the date of reclassification, failing which, I will be reclassified as persons belonging to the promoter group of the company.
- 8.0 I also confirm that I will comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I will be reclassified as promoter/person belonging to promoter group of the company.
- 9.0 In view of the aforesaid, I request you to kindly consider the above and exclude me and my lineal descendants, being my three married daughters, as above, from the category of promoter group of Kkalpana Industries (India) Limited. Upon the said exclusion, myself and my three daughters would cease to remain part of the "Promoter

Anita Devi Surana

and Promoter Group” category and would become part of “Public Group” category.

10.0 In case you require any further clarification and/or documents, please let me know.

Yours faithfully

Anita Devi Surana

Anita Devi Surana

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