

# SARTHAK INDUSTRIES LIMITED

CIN: L99999MH1982PLC136834

Regd. Office: ROOM NO. 4, ANNA BHUVAN, 3RD FLOOR, 87C DEVJI RATANSI MARG, DANA BUNDER, MUMBAI, (Maharashtra) 400009,

Phone: 022 23480110, Email: [sarthakindustries@yahoo.in](mailto:sarthakindustries@yahoo.in), website: [www.sarthakindustries.com](http://www.sarthakindustries.com)

To,  
**BSE Limited**  
25<sup>th</sup> Floor, New Trading Ring,  
P.J. Towers, Dalal Street, Fort,  
Mumbai-400001  
**Scrip Code: 531930**

**Date: 10-07-2025**

**Ref: Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended. ("SEBI Listing Regulations")**

**Sub: Intimation regarding receipt of request from promoters and promoter Group, seeking re-classification from 'Promoter & Promoter Group' to 'Public category';**

Dear Sir/Ma'am,

With reference to the above captioned subject and pursuant to the Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, *(including any statutory modification(s), amendment(s) and re-enactment(s) thereof)*, this is to inform you that the Company has received requests from following promoters and promoter groups on July 10, 2025, for seeking re-classification from the category of 'Promoter & Promoter Group' to 'Public';

S. No.	Name of Promoters and Promoter group seeking re-classification	Category	No. of Shares held	% of holding
1.	Abhadevi Shahra	Promoter group	4667	0.05
2.	Shweta Shahra	Promoter	0	0.00
3.	Sandhya Khandelwal	Promoter group	667	0.01
4.	Amrita Sachdev	Promoter group	133	0.00
5.	Mahakosh Amusement Pvt. Ltd.	Promoter group	0	0.00
	<b>TOTAL</b>		<b>5467</b>	<b>0.06%</b>

Copies of letters along with requisite undertaking as received from Promoters and Promoter Group are attached herewith. We further wish to inform you that the above-mentioned request will be placed before the forthcoming meeting of the Board of Directors of the Company for their approval and subsequently submit an application for seeking no-objection from stock exchange within the timelines prescribed under the SEBI Listing Regulations.

Kindly take the same on your record.

Thanking you,  
Yours faithfully,  
**For Sarthak Industries Limited**

**Riya Bhandari**  
**Company Secretary & Compliance Officer**

*Encl.: as above*

Date: 10.07.2025

To,

The Board of Directors  
Sarhak Industries Limited  
**CIN:** L99999MH1982PLC136834  
**Regd. Office:** Room No. 4, Anna Bhuvan, 3<sup>rd</sup> Floor,  
87C Devji Ratansi Marg, Dana Bunder,  
Mumbai-400009 (MH)

**Sub: Request letter for seeking approval of Re-classification from Promoter Group category to Public category of Sarhak Industries Limited**

**Ref: Re-classification under Regulation 31 A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR") from Promoter Group category to Public category of Sarhak Industries Limited (the "Company")**

Dear Sir/Ma'am,

With reference to the above subject I, Abha Devi Shahra, would like to inform you that I hold 4667 equity shares of Rs. 10/- each aggregating to 0.05% of the total paid up share capital of the Company and have been classified by the Company under Promoter & Promoter Group Category in the Shareholding Pattern filed by the Company with the Stock Exchange i.e. BSE Limited and other regulatory authorities.

In this regard, I wish to inform you that I am neither related to any of the business carried out by the Company and nor engaged in the management or day to day affairs of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding.

Further in accordance with the provisions of Regulation 31A(1)(b) of SEBI (LODR) Regulations, 2015, as amended, I hereby undertake as follows that I along with persons related to me together:

- I. do not hold more than ten percent of the total voting rights in the Company;
- II. do not exercise control over the affairs of the Company whether directly or indirectly;
- III. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- IV. am not represented on the board of directors of the Company either by myself or on behalf of someone else or through a nominee director;
- V. not acting as a Key Managerial Person in the Company;
- VI. not a 'willful defaulter' as per the Reserve Bank of India Guidelines;
- VII. not a fugitive economic offender.

*Abha Devi Shahra*  
Abha Devi Shahra

I also undertake to abide by the conditions listed in Regulation 31A of the SEBI (LODR) Regulations, 2015, as amended, post such re-classification from "Promoter & Promoter Group Category".

Accordingly, I request you to kindly take necessary steps for my re-classification from "Promoter & Promoter Group Category" to "Public Category" in Sarthak Industries Limited and also assure you my full cooperation in all ways during the entire process of re-classification

Yours truly,



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ABHA DEVI SHAHRA

**Annexure III**

**Undertaking from promoter(s) seeking reclassification**

Date: 10.07.2025

To,  
The Deputy General Manager,  
Listing Compliance Monitoring  
Cell, 24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

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

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Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having a nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall 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, as amended, at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.

*Abhishek Kumar*  
Abhishek Kumar

4. I shall 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, as amended, for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Yours faithfully

Signature



Name: ABHA DEVI SHAHRA

Email Id: [d\\_shahra123@rediffmail.com](mailto:d_shahra123@rediffmail.com)

Contact number: +91- 9820174605

Date: 10.7.25

To,

The Board of Directors

Sarthak Industries Limited

**CIN:** L99999MH1982PLC136834

**Regd. Office:** Room No. 4, Anna Bhuvan, 3<sup>rd</sup> Floor,  
87C Devji Ratansi Marg, Dana Bunder,  
Mumbai-400009 (MH)

**Sub: Request letter for seeking approval of Re-classification from Promoter Group category to Public category of Sarthak Industries Limited**

**Ref: Re-classification under Regulation 31 A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR") from Promoter Group category to Public category of Sarthak Industries Limited (the "Company")**

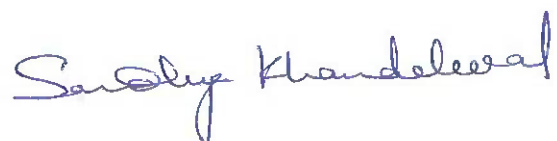
Dear Sir/Ma'am,

With reference to the above subject I, Sandhya Khandelwal, would like to inform you that I hold 667 equity shares of Rs. 10/- each aggregating to 0.01% of the total paid up share capital of the Company and have been classified by the Company under Promoter & Promoter Group Category in the Shareholding Pattern filed by the Company with the Stock Exchange i.e. BSE Limited and other regulatory authorities.

In this regard, I wish to inform you that I am neither related to any of the business carried out by the Company and nor engaged in the management or day to day affairs of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding.

Further in accordance with the provisions of Regulation 31A(1)(b) of SEBI (LODR) Regulations, 2015, as amended, I hereby undertake as follows that I along with persons related to me together:


- I. do not hold more than ten percent of the total voting rights in the Company;
- II. do not exercise control over the affairs of the Company whether directly or indirectly;
- III. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- IV. am not represented on the board of directors of the Company either by myself or on behalf of someone else or through a nominee director;
- V. not acting as a Key Managerial Person in the Company;
- VI. not a 'willful defaulter' as per the Reserve Bank of India Guidelines;
- VII. not a fugitive economic offender.



I also undertake to abide by the conditions listed in Regulation 31A of the SEBI (LODR) Regulations, 2015, as amended, post such re-classification from "Promoter & Promoter Group Category".

Accordingly, I request you to kindly take necessary steps for my re-classification from "Promoter & Promoter Group Category" to "Public Category" in Sarthak Industries Limited and also assure you my full cooperation in all ways during the entire process of re-classification

Yours truly,

  
SANDHYA KHANDELWAL

**Annexure III**

**Undertaking from promoter(s) seeking reclassification**

Date: 10.7.25

To,  
The Deputy General Manager,  
Listing Compliance Monitoring  
Cell, 24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

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

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Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

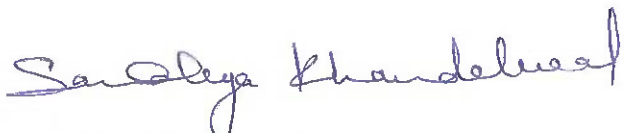
1. I along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having a nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall 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, as amended, at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.





4. I shall 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, as amended, for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Yours faithfully

Signature 

Name: SANDHYA KHANDELWAL

Email Id: Sandhya.khandelwal11@gmail.com

Contact number: +91-

Date: July 10, 2025

To,

The Board of Directors  
Sarthak Industries Limited  
**CIN:** L99999MH1982PLC136834  
**Regd. Office:** Room No. 4, Anna Bhuvan, 3<sup>rd</sup> Floor,  
87C Devji Ratansi Marg, Dana Bunder,  
Mumbai-400009 (MH)

**Sub: Request letter for seeking approval of Re-classification from Promoter Group category to Public category of Sarthak Industries Limited**

**Ref: Re-classification under Regulation 31 A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR") from Promoter Group category to Public category of Sarthak Industries Limited (the "Company")**

Dear Sir/Ma'am,

With reference to the above subject I, Shweta Shahra, hereby inform you that I do not hold any shares of the Company and have been classified by the Company under Promoter & Promoter Group Category in the Shareholding Pattern filed by the Company with the Stock Exchange i.e. BSE Limited and other regulatory authorities.

In this regard, I wish to inform you that I am neither related to any of the business carried out by the Company and nor engaged in the management or day to day affairs of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding.

Further in accordance with the provisions of Regulation 31A(1)(b) of SEBI (LODR) Regulations, 2015, as amended, I hereby undertake as follows that I along with persons related to me together:

- I. do not hold more than ten percent of the total voting rights in the Company;
- II. do not exercise control over the affairs of the Company whether directly or indirectly;
- III. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- IV. am not represented on the board of directors of the Company either by myself or on behalf of someone else or through a nominee director;
- V. not acting as a Key Managerial Person in the Company;
- VI. not a 'willful defaulter' as per the Reserve Bank of India Guidelines;
- VII. not a fugitive economic offender.

I also undertake to abide by the conditions listed in Regulation 31A of the SEBI (LODR) Regulations, 2015, as amended, post such re-classification from "Promoter & Promoter Group Category".

Accordingly, I request you to kindly take necessary steps for my re-classification from "Promoter & Promoter Group Category" to "Public Category" in Sarthak Industries Limited and also assure you my full cooperation in all ways during the entire process of re-classification

Yours truly,

*Shweta Shahra*

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SHWETA SHAHRA

### **Annexure III**

#### **Undertaking from promoter(s) seeking reclassification**

Date: July 10, 2025

To,  
The Deputy General Manager,  
Listing Compliance Monitoring  
Cell, 24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

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

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Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having a nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall 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, as amended, at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.

4. I shall 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, as amended, for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Yours faithfully

*Shweta Shahra*

Signature

Name: SHWETA SHAHRA

Email Id:

Contact number: +91-

# MAHAKOSH AMUSEMENT PRIVATE LIMITED

CIN - U55201MP1991PTC006538

Regd. Office: 9/2, South Tukoganj, 302 Royal Estate, Indore-452001, MP

Contact No.: - 0731-2513281, Email: [mahakoshamusement@gmail.com](mailto:mahakoshamusement@gmail.com)

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Date: 10-07-2025

To,

The Board of Directors  
Sarathak Industries Limited  
CIN: L99999MH1982PLC136834  
Regd. Office: Room No. 4, Anna Bhuvan, 3<sup>rd</sup> Floor,  
87C Devji Ratansi Marg, Dana Bunder,  
Mumbai-400009 (MH)

**Sub: Request letter for seeking approval of Re-classification from Promoter Group category to Public category of Sarathak Industries Limited**

**Ref: Re-classification under Regulation 31 A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR") from Promoter Group category to Public category of Sarathak Industries Limited (the "Company")**

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Dear Sir/Ma'am,

With reference to the above subject We, Mahakosh Amusement Pvt. Ltd., hereby inform you that We do not hold any shares of the Company and have been classified by the Company under Promoter & Promoter Group Category in the Shareholding Pattern filed by the Company with the Stock Exchange i.e. BSE Limited and other regulatory authorities.

Further to inform that Mahakosh Amusement Pvt. Ltd., or its representatives are not engaged in the management or day to day affairs of the Company and also do not have any right either to nominate any Director of the Company or an ability to control the management or policy decisions of the Company in any manner. None of our act would influence the decision taken by the Company.

Further in accordance with the provisions of Regulation 31A(1)(b) of SEBI (LODR) Regulations, 2015, as amended, I hereby undertake as follows that I along with persons related to me together:

- I. Mahakosh Amusement Pvt. Ltd. do not hold more than ten percent of the total voting rights in the Company;
- II. Mahakosh Amusement Pvt. Ltd. do not exercise control over the affairs of the Company whether directly or indirectly;
- III. Mahakosh Amusement Pvt. Ltd. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- IV. The representatives of Mahakosh Amusement Pvt. Ltd. do not represent on the board of directors of the Company either by myself or on behalf of someone else or through a nominee director;
- V. The representatives of Mahakosh Amusement Pvt. Ltd. do not act as a Key Managerial Person in the Company;
- VI. Mahakosh Amusement Pvt. Ltd. is not a 'willful defaulter' as per the Reserve Bank of India Guidelines;
- VII. Mahakosh Amusement Pvt. Ltd. is not a fugitive economic offender.

# MAHAKOSH AMUSEMENT PRIVATE LIMITED

CIN - U55201MP1991PTC006538

Regd. Office: 9/2, South Tukoganj, 302 Royal Estate, Indore-452001, MP

Contact No.:- 0731-2513281, Email: [mahakoshamusement@gmail.com](mailto:mahakoshamusement@gmail.com)

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We also undertake to abide by the conditions listed in Regulation 31A of the SEBI (LODR) Regulations, 2015, as amended, post such re-classification from "Promoter & Promoter Group Category".

Accordingly, We request you to kindly take necessary steps for our re-classification from "Promoter & Promoter Group Category" to "Public Category" in Sarthak Industries Limited and also assure you our full cooperation in all ways during the entire process of re-classification

Thanking you,  
Yours Faithfully,

**FOR MAHAKOSH AMUSEMENTS PRIVATE LIMITED**



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**MRIDULA SHAHRA**  
**DIRECTOR**  
**DIN: 00659985**

# MAHAKOSH AMUSEMENT PRIVATE LIMITED

CIN - U55201MP1991PTC006538

Regd. Office: 9/2, South Tukoganj, 302 Royal Estate, Indore-452001, MP

Contact No.:- 0731-2513281, Email: [mahakoshamusement@gmail.com](mailto:mahakoshamusement@gmail.com)

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## Annexure III

### Undertaking from promoter(s) seeking reclassification

Date: 10 - 07 - 2025

To,  
The Deputy General Manager, Listing  
Compliance Monitoring Cell, 24<sup>th</sup> Floor,  
P.J. Towers,  
Dalal Street, Mumbai -400001

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

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Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having an nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall 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, as amended, at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.



# MAHAKOSH AMUSEMENT PRIVATE LIMITED

CIN - U55201MP1991PTC006538

Regd. Office: 9/2, South Tukoganj, 302 Royal Estate, Indore-452001, MP

Contact No.:- 0731-2513281, Email: [mahakoshamusement@gmail.com](mailto:mahakoshamusement@gmail.com)

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4. I shall 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, as amended, for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Yours faithfully

FOR MAHAKOSH AMUSEMENTS PRIVATE LIMITED

*mridula shahra*

MRIDULA SHAHRA  
DIRECTOR  
DIN: 00659985

Email Id: [mriduladevi.shahra@gmail.com](mailto:mriduladevi.shahra@gmail.com)

Contact number: +91- 98260395000

Date: July 10, 2025

To,

The Board of Directors  
Sarthak Industries Limited  
**CIN:** L99999MH1982PLC136834  
**Regd. Office:** Room No. 4, Anna Bhuvan, 3<sup>rd</sup> Floor,  
87C Devji Ratansi Marg, Dana Bunder,  
Mumbai-400009 (MH)

**Sub: Request letter for seeking approval of Re-classification from Promoter Group category to Public category of Sarthak Industries Limited**

**Ref: Re-classification under Regulation 31 A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR") from Promoter Group category to Public category of Sarthak Industries Limited (the "Company")**

Dear Sir/Ma'am,

With reference to the above subject I, Amrita Sachdev, would like to inform you that I hold 133 equity shares of Rs. 10/- each aggregating to 0.00143 % of the total paid up share capital of the Company and have been classified by the Company under Promoter & Promoter Group Category in the Shareholding Pattern filed by the Company with the Stock Exchange i.e. BSE Limited and other regulatory authorities.

In this regard, I wish to inform you that I am neither related to any of the business carried out by the Company and nor engaged in the management or day to day affairs of the Company and also do not have any right either to appoint any Director of the Company or an ability to control the management or policy decisions of the Company in any manner whatsoever including by virtue of my shareholding.

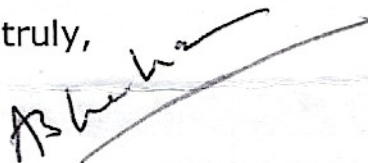
Further in accordance with the provisions of Regulation 31A(1)(b) of SEBI (LODR) Regulations, 2015, as amended, I hereby undertake as follows that I along with persons related to me together:

- I. do not hold more than ten percent of the total voting rights in the Company;
- II. do not exercise control over the affairs of the Company whether directly or indirectly;
- III. do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- IV. am not represented on the board of directors of the Company either by myself or on behalf of someone else or through a nominee director;
- V. not acting as a Key Managerial Person in the Company;
- VI. not a 'willful defaulter' as per the Reserve Bank of India Guidelines;
- VII. not a fugitive economic offender.

I also undertake to abide by the conditions listed in Regulation 31A of the SEBI (LODR) Regulations, 2015, as amended, post such re-classification from "Promoter & Promoter Group Category".

Accordingly, I request you to kindly take necessary steps for my re-classification from "Promoter & Promoter Group Category" to "Public Category" in Sarthak Industries Limited and also assure you my full cooperation in all ways during the entire process of re-classification

Yours truly,

A handwritten signature in black ink, appearing to read 'Amrita Sachdev', is written over a horizontal line.

AMRITA SACHDEV



**Annexure III**

**Undertaking from promoter(s) seeking reclassification**

Date: July 10, 2025

To,  
The Deputy General Manager,  
Listing Compliance Monitoring  
Cell, 24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

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

---

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having an nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall 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, as amended, at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.

4. I shall 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, as amended, for a period of ~~not less than three years from the date of reclassification~~, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Yours faithfully

Signature 

Name: AMRITA SACHDEV

Email Id: office\_work2018@rediffmail.com

Contact number: +91- 9820174605