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S. M.GUPTA & CO.
COMPANY SECRETARIES
P-15 BENTINCK STREET, CALCUTTA-700 001

Ref. No.....

Dated.....

Certificate of Reconciliation of Share Capital Audit
[See Regulation 76 of SEBI (Depositories and Participants)
Regulations, 2018]

We have audited the relevant records and documents of **M/s SPML INFRA LIMITED (Formerly known as M/s SUBHASH PROJECTS AND MARKETING LIMITED)(CIN: L40106DL1981PLC012228)** for the quarter ended 30th September, 2023 for the purpose of issuing Certificate of reconciliation of share capital with both the Depositories and the total issued and listed capital as required pursuant to Notification No. SEBI/LAD-NRO/GN/2018/40 dated 3rd October, 2018 issued by the Securities & Exchange Board of India (SEBI) and on the basis of such checks which to the best of our knowledge and belief were necessary for the purpose of this certification and on the basis of information and explanations given to us and according to the examinations carried out by us including by way of electronic mode, we do hereby certify that in our opinion and according to the best of our information and belief:

- (1) The total number of the shares held in the NSDL, CDSL and in the physical form is given in the Annexure hereto and the same tallies with the paid-up capital of the Company.
- (2) The Register of Members is updated.
- (3) Valid dematerialization requests have been generally confirmed within the stipulated period.
- (4) There has been no change in the paid-up share capital of the company during the above quarter as specified in the annexure hereto.

Place: Kolkata
Date: 07.10.2023

For S. M. Gupta & Co.
Company Secretaries
Firm Registration No.: S1993WB816800



S. M. Gupta
Proprietor
Membership Number: FCS-896
C. P. No: 2053
Peer Review: 2464/2022
UDIN: F000896E00121151

Annexure – I

1.	<i>For Quarter ended</i>		30 th September, 2023				
2.	<i>ISIN</i>		INE937A01023				
3.	<i>Face Value</i>		Fully paid-up Equity Shares of Rs. 2/- each				
4.	<i>Name of the Company</i>		SPML INFRA LIMITED CIN: L40106DL1981PLC012228 (Formerly known as "Subhash Projects And Marketing Limited")				
5.	<i>Registered Office Address</i>		F-27/2, Okhla Industrial Area, Phase II, New Delhi – 110 020				
6.	<i>Correspondence Address</i>		22, Camac Street, Block-A, 3 rd Floor, Kolkata-700016				
7.	<i>Telephone & Fax Nos.</i>		Ph: +91-033-40091200				
8.	<i>Email Address</i>		cs@spml.co.in				
9.	<i>Names of the Stock Exchanges where the Company's securities are listed</i>		1) BSE Limited (BSE) 2) National Stock Exchange of India Limited (NSE) 3) The Calcutta Stock Exchange Ltd. (CSE)				
			<i>Number of shares</i>				
10.	<i>Issued Capital</i>		4,89,77,926	Equity Shares			
11.	<i>Listed Capital (Exchange-wise) (as per Company's records)</i>		4,89,77,926	Equity Shares			
				<i>% of Total capital</i>			
12.	<i>Held in Dematerialised form in CDSL</i>		90,15,947	18.41%			
13.	<i>Held in Dematerialised form in NSDL</i>		3,98,11,543	81.28%			
14.	<i>Physical</i>		1,50,436	0.31%			
15.	<i>Total No. of Shares (12+13+14)</i>		4,89,77,926	(As per RTA Certificate)			
16.	<i>Reasons for difference, if any</i>		N. A.				
17.	<i>Certifying the details of changes in share capital during the quarter under consideration as per Table below: NO CHANGE IN SHARE CAPITAL</i>						
	<i>Particulars*</i>	<i>No. of shares</i>	<i>Applied/ Not applied for Listing</i>	<i>Listed on Stock exchanges (Specify Names)</i>	<i>Whether intimated to CDSL</i>	<i>Whether intimated to NSDL</i>	<i>In-prin. app pending for SE (Specify Names)</i>
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	<i>* Rights, Bonus, Preferential Issue, ESOPs, amalgamation, Conversion, Buyback, Capital Reduction, Forfeiture, any other (to specify)</i>						
18.	<i>Register of Members updated (Yes/No) If not, updated upto which date</i>			Yes			
19.	<i>Reference of previous quarter with regards to excess dematerialized shares, if any</i>			Nil			
20.	<i>Has the company resolved the matter mentioned in point no. 19 above in the current quarter? If not, reason why?</i>			N. A.			



21.	Mention the total no. of requests, if any, confirmed after 21 days and the total no. of requests pending beyond 21 days with the reasons for delay: (As per RTA certificate)															
	Total No. of Demat requests	No. of requests	No. of shares	Reasons for delay												
	Confirmed after 21 days	Nil	Nil	N.A.												
	Pending for more than 21 days	Nil	Nil	N.A.												
22.	Name, Telephone & Fax no. of the Compliance Officer of the Company	Mrs. Swati Agarwal, Company Secretary & Compliance Officer Membership No.: ACS 29786 Phone No.: (33) 40091200														
23.	Name, Address, Telephone & Fax no., Regn. no. of the Auditor	Mr. S. M. Gupta (CP – 2053) M/s. S. M. Gupta & Co., Company Secretaries, P-15, Bentinck Street, Kolkata – 700 001 Ph: 91-033-2236 1385														
24.	Appointment of common agency for share registry work (if yes, name and address)	M/s. Maheshwari Datamatics Private Limited, 23, R.N Mukherjee Road, 5th Floor, Kolkata – 700 001														
25.	Any other detail that the Auditor may like to provide (eg. BIFR Company, delisting from SE, company changed its name etc.)	<p>1. The shares of the Company have been delisted from Delhi, Kanpur, Bangalore and Gauhati Stock Exchanges. Confirmation for delisting is still awaited from the Calcutta Stock Exchange.</p> <p>2. The proposal of the Company for shifting of the Registered Office of the Company from the "Union Territory of Delhi" to the State of "West Bengal" and accordingly alteration in Clause II of the Memorandum of Association of the Company, to the effect that the registered office of the Company will be shifted from F-27/2, Okhla Industrial Area Phase-II, New Delhi -110020 situated under the jurisdiction of the Registrar of Companies, "Delhi" to 22, Camac Street, Block-A, 3rd Floor, Kolkata-700016, situated under the jurisdiction of Registrar of Companies, Kolkata in the state of "West Bengal" subject to further approval of the Central Government and/or any other authority as may be prescribed from time to time, is under process.</p> <p>3. The Paid-up Share Capital of the Company amounting to Rs. 9,79,55,852/- does not include Rs. 86,44,000/- received as Forfeited Shares amount.</p> <p>4. The Authorised capital of the Company as on date stand as follows: Equity Capital – Rs. 40 Crores (F.V. Rs. 2 each) Preference Capital – Rs. 75 Crores (F.V. Rs. 100 each)</p> <p>5. The following shares allotted on different dates are under lock in upto the respective dates given below:</p> <table border="1"> <thead> <tr> <th>No. of Shares</th> <th>Allotted on</th> <th>lock-in upto</th> </tr> </thead> <tbody> <tr> <td>27,75,000</td> <td>07.03.2022</td> <td>15.11.2023</td> </tr> <tr> <td>32,54,930</td> <td>06.04.2022</td> <td>15.12.2023</td> </tr> <tr> <td>35,54,930</td> <td>17.04.2023</td> <td>15.04.2024</td> </tr> </tbody> </table>			No. of Shares	Allotted on	lock-in upto	27,75,000	07.03.2022	15.11.2023	32,54,930	06.04.2022	15.12.2023	35,54,930	17.04.2023	15.04.2024
No. of Shares	Allotted on	lock-in upto														
27,75,000	07.03.2022	15.11.2023														
32,54,930	06.04.2022	15.12.2023														
35,54,930	17.04.2023	15.04.2024														

