

April 16, 2026

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| <b>To,<br/>The Manager,<br/>Listing Department,<br/>BSE Limited,<br/>Phiroze Jeejeebhoy Tower,<br/>Dalal Street,<br/>Mumbai - 400001.<br/>BSE Scrip Code: 540776</b> | <b>To,<br/>The Manager,<br/>Listing Department,<br/>The National Stock Exchange of India Limited,<br/>Exchange Plaza, 5<sup>th</sup> Floor, Plot C/1, G Block,<br/>Bandra - Kurla Complex, Bandra (E),<br/>Mumbai - 400051.<br/>NSE Symbol: 5PAISA</b> |
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**Sub: Disclosure under Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

Dear Sir(s)/Madam(s),

With reference to the captioned subject, we enclose herewith the disclosures under Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, in our capacity as promoters of Spaisa Capital Limited for acquisition of Equity Shares pursuant to Rights Issue.

Kindly take the same on record and oblige.

Thanking You,  
Yours faithfully,

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**Nirmal Jain**  
**Promoter**  
**Spaisa Capital Limited**

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**Venkataraman Rajamani**  
**Promoter**  
**Spaisa Capital Limited**

**Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

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|---|---|---|---|
| <b>Name of the Target Company (TC)</b>  | Spaisa Capital Limited  |   |   |
| <b>Name(s) of the acquirer</b>  | 1. Nirmal Bhanwarlal Jain<br>2. Madhu N Jain<br>3. Venkataraman Rajamani<br>4. Aditi Avinash Athavankar (in the capacity as Trustee of Kalki Family Private Trust)<br>5. Aditi Athavankar<br>6. Mansukhlal Jain & Pritesh Mehta (in their capacity as Trustee of Nirmal Madhu Family Private Trust)<br>7. Harshita Nirmal Jain<br>8. Ardent Impex Private Limited<br>9. Orpheus Trading Private Limited |   |   |
| <b>Whether the acquirer belongs to Promoter/Promoter group</b>  | Yes   |   |   |
| <b>Name(s) of the Stock Exchange(s) where the shares of TC are Listed</b>                             | BSE Limited<br>National Stock Exchange of India Limited   |   |   |
| <b>Details of the acquisition / disposal as follows</b>   | <b>Number</b>   | <b>% w.r.t. total share/voting capital wherever applicable(*)</b> | <b>% w.r.t. total diluted share/voting capital of the TC (**)</b> |
| <b>Before the acquisition under consideration, holding of:</b>  |   |   |   |
| a) Shares carrying voting rights:   |   |   |   |
| - Nirmal Bhanwarlal Jain  | 62,05,088   | 19.85%  | 19.46%  |
| - Madhu N Jain  | 18,45,016   | 5.90%   | 5.79%   |
| - Venkataraman Rajamani   | 12,69,594   | 4.06%   | 3.98%   |
| - Aditi Avinash Athavankar (in the capacity as Trustee of Kalki Family Private Trust)                 | 7,20,000  | 2.30%   | 2.26%   |
| - Aditi Athavankar  | 16,000  | 0.05%   | 0.05%   |
| - Mansukhlal Jain & Pritesh Mehta (in their capacity as Trustee of Nirmal Madhu Family Private Trust) | 15,000  | 0.05%   | 0.05%   |
| - Harshita Nirmal Jain  | 10,420  | 0.03%   | 0.03%   |
| - Ardent Impex Private Limited  | 1,08,000  | 0.35%   | 0.34%   |
| - Orpheus Trading Private Limited   | 52,000  | 0.17%   | 0.16%   |
| b) Shares in the nature of encumbrance (pledge/lien/ non-disposal undertaking/ others)                | -   | -   | -   |
| c) Voting rights (VR) otherwise than by shares  | -   | -   | -   |
| d) Warrants/ convertible securities/ any other instrument that entitles the acquirer to receive       | -   | -   | -   |

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| shares carrying voting rights in the TC (specify holding in each category)   |             |        |        |
| e) Total (a+b+c+d)   | 1,02,41,118 | 32.76% | 32.12% |
| <b>Details of acquisition/sale:</b>  |             |        |        |
| a) Shares carrying voting rights acquired  |             |        |        |
| - Nirmal Bhanwarlal Jain   | 31,02,544   | 0.00%  | 0.13%  |
| - Madhu N Jain   | 9,22,508    | 0.00%  | 0.03%  |
| - Venkataraman Rajamani  | 13,15,000   | 1.45%  | 1.46%  |
| - Aditi Avinash Athavankar (in the capacity as Trustee of Kalki Family Private Trust)  | 7,20,000    | 0.77%  | 0.77%  |
| - Aditi Athavankar   | 8,000       | 0.00%  | 0.00%  |
| - Mansukhlal Jain & Pritesh Mehta (in their capacity as Trustee of Nirmal Madhu Family Private Trust)  | 65,059      | 0.12%  | 0.12%  |
| - Harshita Nirmal Jain   | 45,195      | 0.09%  | 0.09%  |
| - Ardent Impex Private Limited   | 4,68,429    | 0.88%  | 0.87%  |
| - Orpheus Trading Private Limited  | 2,25,540    | 0.42%  | 0.42%  |
| b) VRs acquired/sold otherwise than by shares  | -           | -      | -      |
| c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold | -           | -      | -      |
| d) Shares encumbered / invoked/ released by the acquirer   | -           | -      | -      |
| e) Total (a+b+c+/-d)   | 68,72,275   | 3.73%  | 3.89%  |
| <b>After the acquisition/sale, holding of:</b>   |             |        |        |
| a) Shares carrying voting rights   |             |        |        |
| - Nirmal Bhanwarlal Jain   | 93,07,632   | 19.85% | 19.59% |
| - Madhu N Jain   | 27,67,524   | 5.90%  | 5.82%  |
| - Venkataraman Rajamani  | 25,84,594   | 5.51%  | 5.44%  |
| - Aditi Avinash Athavankar (in the capacity as Trustee of Kalki Family Private Trust)  | 14,40,000   | 3.07%  | 3.03%  |
| - Aditi Athavankar   | 24,000      | 0.05%  | 0.05%  |
| - Mansukhlal Jain & Pritesh Mehta (in their capacity as Trustee of Nirmal Madhu Family Private Trust)  | 80,059      | 0.17%  | 0.17%  |
| - Harshita Nirmal Jain   | 55,615      | 0.12%  | 0.12%  |

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| - Ardent Impex Private Limited   | 5,76,429  | 1.23%  | 1.21%  |
| - Orpheus Trading Private Limited  | 2,77,540  | 0.59%  | 0.58%  |
| a) Shares encumbered with the acquirer   | -   | -      | -      |
| b) VRs otherwise than by shares  | -   | -      | -      |
| c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition | -   | -      | -      |
| d) Total (a+b+c+d)   | 1,71,13,393   | 36.50% | 36.01% |
| Mode of acquisition / sale (e.g. open market/ off-market/ public issue/ rights issue/ preferential allotment / inter-se transfer etc).   | Rights Issue  |        |        |
| Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable   | April 13, 2026 (Date of Allotment)  |        |        |
| Equity share capital / total voting capital of the TC before the said acquisition / sale   | Rs. 31,25,48,380/- consisting of 31,254,838 equity shares of Rs. 10/- each  |        |        |
| Equity share capital/ total voting capital of the TC after the said acquisition / sale   | Rs. 46,88,22,570/- consisting of 4,68,82,257 equity shares of Rs. 10/- each |        |        |
| Total diluted share/voting capital of the TC after the said acquisition  | Rs. 47,51,97,070/- consisting of 4,75,19,707 equity shares of Rs. 10/- each |        |        |

**Note:**

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(\*\*)Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Thanking you,  
Yours Faithfully,

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**Nirmal Jain**  
**Promoter**  
**Spaisa Capital Limited**

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**Venkataraman Rajamani**  
**Promoter**  
**Spaisa Capital Limited**