

Date: May 08, 2025

To,
Securities and Exchange Board of India
Corporate Finance Department,
Division of Issue and Listing,
SEBI Bhavan, Plot No. C4-A, 'G' Block,
Bandra-Kurla Complex, Bandra (East)
Mumbai 40005, Maharashtra

Kind Attention: Ms. Anmola Agrawal

Sub.: Request for seeking exemption under Regulation 300(1) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended ("SEBI ICDR Regulations") and pursuant to SEBI's email to the Association of Investment Bankers of India dated April 26, 2022 (the "Exemption Application")

Proposed Initial Public Offering of equity shares of face value of ₹10/- each ("Equity Shares") of Sattva Engineering Construction Limited (the "Company") comprising fresh issue of Equity Shares ("Issue")

Ref.: Email dated May 05, 2025, received from the Securities and Exchange Board of India ("SEBI") on the request for seeking exemption under Regulation 300(1) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018

With reference to the subject mentioned above and the email dated May 05, 2025, received from SEBI, please find below our pointwise responses to the clarifications sought:

1. LM is advised to confirm whether any action (including debarment) has been initiated or undertaken against the promoter group entity which may make the issuer ineligible to make an IPO.

We confirm that none of the promoter group entities have been debarred from accessing the capital market by SEBI. The legal advisors as well as the lead manager has conducted searches on the websites of TransUnion CIBIL and Watchout Investors database and not found any adverse order or other instruction issued to any promoter group entity debaring them from accessing the capital market.

We also confirm that no action has been taken or pending against the promoter group entities, including those specifically described in Regulation 228 of the SEBI ICDR Regulations, that would render the issuer ineligible to undertake an IPO.

2. LM is advised to provide reason, other than unwillingness, provided by dissenting promoter group for seeking relaxation from being disclosed as promoter group.

The dissenting promoter group entities do not have any role in the management or operations of the Company or its subsidiary. They have not been associated with the Company at any time in any capacity, including as a promoter or director. They have not held, and do not currently hold any equity shares, warrants/convertible securities, stock options or other securities in the Company, nor do they have any special rights through any formal or informal arrangement. They do not intend to, and will not, participate in the IPO.

We have submitted an affidavit from each of the Dissenting Promoter Group and have also confirmed that none of the Dissenting Promoter Group holds any interest in the Company, either by way of debt or equity or in the capacity of a vendor, supplier or client. In short, the Dissenting Promoter Group has no association or relationship with the Company. Additionally, we have advised the dissenting promoter group to provide all necessary information and documentation in accordance with the advisory issue issued by SEBI to AIBI on April 26, 2022.

**Vivro Financial Services Private Limited**

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For any further information or clarifications, you may contact the following representatives of Vivro Financial Services Private Limited:

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Thanking you,
Your sincerely,

For, Vivro Financial Services Private Limited

Authorised Signatory

Name: Vivek Vaishnav

Designation: Director