

PANKAJ KUMAR

A-903, Lake Castle  
Cliff Avenue  
Hiranandani Garden  
Powai, Mumbai - 50

M/s. Geodesic Ltd. (Under Liquidation  
with Official Liquidator)  
The Official Liquidator  
Bank of India Building,  
Fort, Mumbai -400001

016896

✓  
Bombay Stock Exchange Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai- 400001

The National Stock Exchange of India Limited  
Exchange Plaza, C-1 Block G,  
Bandra Kurla Complex, Bandra  
Mumbai - 400051.

November 04, 2017

Dear Sir,

Sub.: Disclosure under Regulation 13(3) (Form C) and 13(4) and 13(4A) (Form D) of SEBI (Prohibition of Insider Trading) Regulations, 1992 in the scrip of Geodesic Ltd.

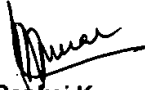
Please find enclosed herewith (1) Form C under Regulation 13 (3) and (2) Form D under Regulation 13(4) and 13(4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992, (3) Annexure 2 under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and (4) Disclosure under Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

I state that in and around June 2012, Geodesic Limited ("GDL") had availed short term loan for around Rs.55 crores from ICICI Bank Ltd out of a sanctioned limit of Rs.130 crores (hereinafter referred to as "ICICI Bank") and as a security towards the same, ICICI Bank had obtained security in the form of First Security Interest over the Non Disposal Undertaking ("NDU") and Power of Attorney ("POA") over the shares of the company held by me and other promoters. The said shares of the me and other promoters were deposited in a designated account with ICICI Securities Ltd ("ICICI Securities"). In order to recover the amounts due under the aforesaid loan, ICICI Bank using the said POA pledged my shares alongwith other promoters with NDU accounts and subsequently invoked/sold the pledge and shares in my trading account. I repeat, reiterate and submit that I was not informed of the details regarding the said sale by ICICI Bank. This led to non-disclosure of the creation, invocation of pledge and change in shareholding of the Applicant. During October 2016 and January 2017, I myself as well as through my Advocates sought details and documents of the said transactions from ICICI Bank Ltd. and ICICI Securities Ltd., however, nothing is provided till date.

It is for the above reasons that I was unable to make the disclosures under the applicable Rules and Regulations and the same were beyond my control and now I making the "Disclosures" solely based on the partial information/documents available with me or which came to my notice during the various ongoing litigation against me and I repeat, reiterate and submit that till date I am not in possession of all relevant information as required to make Disclosures annexed herewith.

Kindly take the above on record.

Thanking you

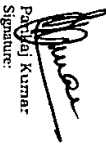
A handwritten signature in black ink, appearing to read 'Pankaj Kumar', written over a horizontal line.

**Pankaj Kumar**

Encl.: as above

Format for disclosure by the Promoter(s) to the stock exchanges and to the Target Company for encumbrance of shares/invocation of encumbrance/ release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011:

Name of the Target Company (TC)		Geodesic Limited												
Names of the Stock Exchanges where the shares of the target company are listed		Bombay Stock Exchange Limited and National Stock Exchange of India Limited												
Date of reporting		04-11-2017												
Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked		Pankaj Kumar												
Details of the creation of encumbrance														
Name of the promoter(s) or PACs with him/ly	Promoter holding in the target company (1)	% of total share capital	No of shares	Promoter holding already encumbered (2)		Type of event (creation/release/invocation)	Date of creation/invocation/ release of encumbrance	Type of encumbrance (Pledge/ lien / non disposal undertaking/ others)	Reasons for encumbrance**	No of shares	% of total share capital	Name of the entity in whose favour shares are encumbered***	Post event holding of encumbered shares (creation (2)-(3)/release (2)-(3))/ Invocation (1)-(3))	
				% of total share capital	No of shares								No. of Shares	% of total share capital
Pankaj Kumar	51,21,957	5.67	1,35,000	2,64	1,35,000	Invocation	2-3-2013	Non disposal undertaking	Loan taken by Company	19,345	0.02	ICICI Bank Limited	51,02,612	5.65

  
Pankaj Kumar  
Signature:

Place : Mumbai  
Date : 04/11/2017

\* The names of all the promoters, their shareholding in the target company and their pledged shareholding as on the reporting date should appear in the table irrespective of whether they are reporting on the date of event or not.


\*\* For example, for the purpose of collateral for loans taken by the Company, personal borrowing, third party pledge, etc.

\*\*\* This would include name of both the lender and the trustee who may hold shares directly or on behalf of the lender.

Format for disclosure by the Promoter(s) to the stock exchanges and to the Target Company for encumbrance of shares/invocation of encumbrance/ release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)		Names of the Stock Exchanges where the shares of the target company are listed		Date of reporting		Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked		Details of the creation of encumbrance							
Name of the Promoter(s) or PACs with him(*)		Promoter holding in the target company (1)	% of total share capital	Promoter holding already encumbered (2)	% of total share capital	Type of event (creation/release/invocation)	Date of creation/invocation/ release of encumbrance	Type of encumbrance (pledge/ lien/ non disposal/ others)	Reasons for encumbrance	No. of shares of	% of total share capital	Name of the entity in whose favour shares encumbered	No. of Shares (2)+(3)/release (2)-(3)/ invocation (1)-(3))	% of total share capital	
Godestic Limited Bombay Stock Exchange Limited and National Stock Exchange of India Limited		04-11-2017		Pankaj Kumar		Invocation		7-3-2013	Non disposal undertaking	Loan taken by Company	40,000	0.04	ICICI Bank Limited	50,81,957	5.63

Place : Mumbai  
Date : 04/1/2017


  
Pankaj Kumar  
Signature:

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Name of the Target Company (TC)	Geodesic Limited
Names of the Stock Exchanges where the shares of the target company are listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited
Date of Reporting	04-11-2017
Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked	Pankaj Kumar

Name of the promoter(s) or PACs with share(s)	Promoter holding in the target company (1)	% of total share capital	No of shares already encumbered (2)	% of total share capital	Type of event (creation/ release/ invocation)	Date of creation/ invocation/ release of encumbrance	Type of encumbrance (pledge/ lien / non disposal / others)	Reasons for encumbrance	No. of shares of	% of total share capital	Name of the entity in whose favour shares are encumbered	No. of Shares (2)-(3)/ invocation (1)-(3)	% of total share capital
Pankaj Kumar	51,21,957	5.67	1,35,000	2.64	Invocation	8-2-2013	Non disposal undertaking	Loan taken by Company	2,48,715	0.28	ICICI Bank Limited	48,73,242	5.39

  
 Pankaj Kumar  
 Signature:  
 Place : Mumbai  
 Date : 04/11/2017


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Name of the Target Company (TC)		Geodesic Limited											
Names of the Stock Exchanges where the shares of the target company are listed		Bombay Stock Exchange Limited and National Stock Exchange of India Limited											
Date of Reporting		04-11-2017											
Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked		Pankaj Kumar											
Details of the creation of encumbrance		Details of events pertaining to encumbrance (3)											
Name of the promoter(s) or PACs with him(*)	Promoter holding in the target company (1)	Promoter holding already encumbered (2)	Type of event (creation/release/invocation)	Date of creation/invocation/ release of encumbrance	Type of encumbrance (pledge/ lien /non encumbrance/ others)	Reasons for encumbrance **	No of shares	% of total share capital	Name of the entity in whose favour shares encumbered	No. of Shares (2)-(3)/(1)-(3))	% of total share capital		
Pankaj Kumar	51,21,957	5,67	1.3500	2.64	Invocation	8-3-2013	Non disposal undertaking	Loan taken by Company	11,778	0.01	ICICI Bank Limited	51,10,179	5.66

Signature: 

Place : Mumbai  
Date : 04/11/2017

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Names of the Stock Exchanges where the shares of the target company are listed		Bombay Stock Exchange Limited and National Stock Exchange of India Limited													
Date of reporting		04-11-2017													
Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked		Pankaj Kumar													
Details of the creation of encumbrance		Pankaj Kumar													
Name of the promoter(s) or PACs with him(*)	Promoter holding in the target company (1)	No of shares	% of total share capital	No of shares	% of total share capital	Type of event (creation/release/invocation)	Date of creation/invocation/ release of encumbrance	Type of encumbrance (pledge/ lien / non undertaking/ others)	Reasons for encumbrance **	No of shares	% of total share capital	Name of the entity in whose favour shares are encumbered ***	No. of Shares (2)-(3)/(2)-(3)/ invocation	Post event holding of encumbered shares (creation (2)-(3)/release (2)-(3)/ invocation (2)-(3))	% of total share capital
Pankaj Kumar	51,21,957	5.67	1.35000	2.64	0.18	Invocation	14-2-2013	Non disposal undertaking	Loan taken by Company	1,64,407	0.18	ICICI Bank Limited	49,57,550	5.49	

  
 Pankaj Kumar  
 Signature:

Place : Mumbai  
 Date : 04/11/2017


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Name of the Target Company (TC)	Geodesic Limited														
Name of the Stock Exchanges where the shares of the target company are listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited														
Date of reporting	04-11-2017														
Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked	Pankaj Kumar														
Details of the creation of encumbrance															
Name of the promoter(s) or PACs with him (*)	Promoter holding in the target company (1)	% of total share capital	No of shares	Promoter holding already encumbered (2)	% of total share capital	Type of event (creation/ release/ invocation)	Date of creation/ invocation/ release of encumbrance	Type of encumbrance (pledge/ lien / non disposal/ undertaking/ others)	Reasons for encumbrance	No of shares	% of total share capital	Name of the entity whose shares are encumbered ***	No. of Shares	Post event holding of encumbered shares (creation [(2)+(3)]/release [(2)-(3)]/ invocation [(1)-(3)])	% of total share capital
Pankaj Kumar	51,21,957	5.67	1,35,000	2,64	2.64	Creation	16-1-2013	Non disposal undertaking	Loan taken by Company	24,20,580		ICICI Bank Limited	25,55,580		

  
 Pankaj Kumar  
 Signature:  
 Place : Mumbai  
 Date : 04/11/2017

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Format for disclosure by the Promoter(s) to the stock exchanges and to the Target Company for encumbrance of shares/invocation of encumbrance/ release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)		Geodesic Limited														
Names of the Stock Exchanges where the shares of the target company are listed		Bombay Stock Exchange Limited and National Stock Exchange of India Limited														
Date of reporting		04-11-2017														
Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked		Pankaj Kumar														
Details of the creation of encumbrance																
Name of the promoter(s) or PACs with him(s)	Promoter holding in the target company (1)	% of total share capital	No of shares	Promoter holding already encumbered (2)	% of total share capital	No of shares	Details of events pertaining to encumbrance (3)			Post event holding of encumbered shares (creation (2)-(3))/release (2)-(3))/ invocation (2)-(3))	% of total share capital					
							Type of event	Date of creation/ invocation/ release of encumbrance	Type of encumbrance (pledge/ lien /non undertaking/ others)			Reasons for encumbrance **	No of shares of disposal	% of total share capital	Name of the entity in whose favour shares are encumbered ***	
Pankaj Kumar	51,21,957	5.67	1,35,000	2,64	2.64	2,04,819	0.23	Invocation	16-2-2013	Non disposal undertaking	Loan taken by Company	2,04,819	0.23	ICI/ICI Bank Limited	49,17,138	5.44

Signature: 

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Date : 04/11/2017

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Name of the Target Company (TC)		Names of the Stock Exchanges where the shares of the target company are listed		Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked		Details of the creation of encumbrance		Details of events pertaining to encumbrance (3)		Post event holding of encumbered shares (creation [2]-[3])/release [2]-[3])/ invocation [2]-[3])				
Name of the promoter(s) or PACs with him(*)	Promoter holding in the target company (1)	No of shares	% of total share capital	Promoter holding already encumbered (2)	% of total share capital	Type of event (creation/release/invocation)	Date of creation/invocation/ release of encumbrance	Type of encumbrance (pledge/ lien /non-disposal/ undertaking/ others)	Reasons for encumbrance **	No of shares	% of total share capital	Name of the entity in whose favour shares encumbered ***	No. of Shares	% of total share capital
Pankaj Kumar	51,21,957	5,67	1,35,00	2,64	1,35,00	Invocation	20-2-2013	Non disposal undertaking	Loan taken by Company	63,877	0,07	ICICI Bank Limited	50,58,080	5,6


  
 Pankaj Kumar  
 Signature:

Place : Mumbai  
 Date : 04/11/2017

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Name of the Target Company (T)		Geodesic Limited													
Names of the Stock Exchanges where the shares of the target company are listed		Bombay Stock Exchange Limited and National Stock Exchange of India Limited													
Date of reporting		04-11-2017													
Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked		Pankaj Kumar													
Details of the creation of encumbrance															
Name of the promoter(s) or PACs with him <sup>(1)</sup>	Promoter holding in the target company (1)	No of shares	% of total share capital	Promoter holding already encumbered (2)	% of total share capital	Type of event (creation/ release/ invocation)	Date of creation/ invocation/ release of encumbrance	Type of encumbrance (pledge/ lien/ non undertaking/ others)	Reasons for encumbrance <sup>**</sup>	No of shares	% of total share capital	Name of the entity in whose favour shares encumbered <sup>***</sup>	Post event holding of encumbered shares (creation (2)-(3))/release (2)-(3))/ invocation (2)-(3))	No. of Shares	% of total share capital
Pankaj Kumar	95,39,350	10.58	60.22	63.13	290	Invocation	20-11-2012	Non disposal undertaking	Loan taken by Company	2,00,000	0.22	ICICI Bank Limited	93,39,350	0	10.36

Signature: 

Place : Mumbai  
Date : 04/11/2017

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Name of the Target Company [1]	Geodesic Limited
Names of the Stock Exchanges where the shares of the target company are listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited
Date of reporting	04-11-2017
Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked	Pankaj Kumar

Name of the promoter(s) or PACs with him(s)	Promoter holding in the target company (1)	Promoter already encumbered (2)	Details of events pertaining to encumbrance (3)					Post event holding of shares (creation (2)+(3)/release (2)-(3))/ invocation (1)- (3))	% of total share capital			
			Type of event (creation/release/invocation)	Date of creation/invocation release of encumbrance	Type of encumbrance (pledge/lien/non disposal/undertaking/ others)	Reasons for encumbrance **	No. of shares			% of total share capital	Name of the entity in whose favour shares encumbered ***	
Pankaj Kumar	95,39,350	60,22,290	63.13	Creation	21-11-2012	Non disposal undertaking	Loan taken by Company	5,32,953	5.58	ICICI Bank Limited	65,55,243	68.75

  
Pankaj Kumar  
Signature:  
Place : Mumbai  
Date : 04/11/2017

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Date of reporting	04-11-2017
Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked	Pankaj Kumar

Name of the promoter(s) or PACs with him(s)	Promoter holding in the target company (1)	No of shares	% of total share capital	Promoter holding already encumbered (2)	% of total share capital	Details of events pertaining to encumbrance (3)						No. of Shares of encumbered shares (creation (2)-(3))/release (2)-(3))/ invocation (1)-(3))	% of total share capital	
						Type of creation/ release/ invocation	Date of creation/ invocation/ release of encumbrance	Type of encumbrance (pledge/ lien / non disposal/ undertaking/ others)	Reasons for encumbrance **	No. of shares	% of total share capital			Name of the entity in whose favour shares are encumbered ***
Pankaj Kumar		51,21,957	5.67	1,35,000	2.64	Invocation	29-1-2013	Non disposal undertaking	Loan taken by Company	1,64,085	0.18	ICICI Bank Limited	49,57,872	5.49

Place : Mumbai  
Date : 04/11/2017

Signature:   
Pankaj Kumar

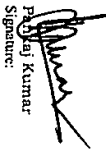
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Name of the Target Company (TC)	Geodesic Limited
Names of the Stock Exchanges where the shares of the target company are listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited
Date of reporting	04-11-2017
Name of the Promoter or PAC on whose shares encumbrance has been created/ release/ invoked	Pankaj Kumar
Details of encumbrance	

Name of the promoter(s) or PACs with him(*)	Promoter holding in the target company (1)	% of total share capital	No of shares already encumbered (2)	% of total share capital	Type of event (creation/release/invoc)	Date of creation/invocation/ release of encumbrance	Type of encumbrance (pledge/ lien /non undertaking/ others)	Reasons for encumbrance **	Details of events pertaining to encumbrance (3)			Post event holding of encumbered shares (creation (2)-(3))/release (2)-(3))/ invocation (1)-(3))	% of total share capital
									No of shares	% of total share capital	Name of the entity in whose favour shares encumbered ***		
Pankaj Kumar	95,39,350	10.58	60,22,290	63.13	Invocation	30-11-2012	Non disposal undertaking	Loan taken by Company	5,32,953	0.59	ICICI Bank Limited	90,06,397	9.99

  
Pankaj Kumar  
Signature:

Place : Mumbai  
Date : 04/11/2017

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**"FORM C"**  
*Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992*  
 [Regulations 13(3) and (6)]

**Regulation 13(3)-Details of change in shareholding in respect of persons holding more than 5% shares in a listed company**

Name, PAN & Address of shareholders	Shareholding prior to acquisition/sale	No. & % of shares/voting rights acquired/sold	Receipt of allotment of shares/sale of shares specify of	Date of intimation to company	Mode of Acquisition (market purchase/public rights / preferential offer etc.)	No. & % of shares/voting rights post acquisition / sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai 400076 PAN :AAHPS2438 K	93.16,111	32,08,291	32,08,291	04-11- 2017	Invocation of pledged equity shares by ICICI Bank Limited	6.76%			N.A	N.A.	32,08,2 91	

  
 Pankaj Kumar

**"FORM C"**  
*Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992*  
 [Regulations 13(3) and (6)]

**Regulation 13(3)-Details of change in shareholding in respect of persons holding more than 5% shares in a listed company**

Name, PAN & Address of shareholders	Shareholding prior to acquisition/sale	No. & % of shares/voting rights acquired/sold	Receipt of allotment advice/acquisition of shares/sale of shares specify	Date of intimation to company	Mode of Acquisition (market purchase/public/rights / preferential offer etc.)	No. & % of shares/voting rights post acquisition / sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai 400076 PAN :AAHPS2438 K	61,07,820	18,98,663	18,98,663	04-11-2017	Invocation of pledged equity shares by ICICI Bank Limited	4.65%			N.A	N.A.	18,98,663	

  
 Pankaj Kumar



**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
**[Regulations 13(4), 13(4A) and 13(6)]**

**Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Person who is part of Promoter Group of a listed company.**

Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	51, 21,957 (5.67 %)	3-1-2013	04-11-2017	Invocation of 1,50,000 pledged equity shares by ICICI Bank Limited	0.17 %					1,50,000	34,725.00

  
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**"FORM D"**

*Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992  
[Regulations 13(4), 13(4A) and 13(6)]*

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Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment advice/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy Value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	51,21,957 (5.67 %)	7-1-2013	04-11-2017	Invocation of 66,403 pledged equity shares by ICICI Bank Limited	0.07 %					66,403	16,89,956.35

  
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**"FORM D"**  
*Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992*  
 [Regulations 13(4), 13(4A) and 13(6)]

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Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	51,21,957 (5.67 %)	8-1-2013	04-11-2017	Invocation of 78,597 pledged equity shares by ICICI Bank Limited	0.09%					78,597	19,88,504.1

  
 Pankaj Kumar

**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

**Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Person who is part of Promoter Group of a listed company.**

Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment advice/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/ rights/ preferential offer, etc./ sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai 400076 PAN :AAHPS2438K	51,21,957 (5.67 %)	8-1-2013	04-11-2017	Invocation of 55,000 pledged equity shares by ICICI Bank Limited	0.06 %					55,000	13,91,500

  
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**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

**Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Person who is part of Promoter Group of a listed company.**


Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	51,21,957 (5.67 %)	11-2-2013	04-11-2017	Invocation of 69,000 pledged equity shares by ICICI Bank Limited	0.08 %					69,000	11,69,550

  
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**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

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Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc.)/sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	51,21,957 (5.67 %)	13-2-2013	04-11-2017	Invocation of 1,69,815 pledged equity shares by ICICI Bank Limited	0.19 %					1,69,815	26,06,660.25

  
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**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

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Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of Intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai 400076 PAN :AAHPS2438K	51,21,957 (5.67 %)	18-2-2013	04-11-2017	Invocation of 65,994 pledged equity shares by ICICI Bank Limited	0.07 %					65,994	8,74,420.5

  
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**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

**Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Person who is part of Promoter Group of a listed company.**

Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai 400076 PAN :AAHPS2438K	95,39,350 (10.58%)	18-12-2012	04-11-2017	Invocation of 1,43,500 pledged equity shares by ICICI Bank Limited	0.16%					1,43,500	46,27,875


  
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**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

**Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Person who is part of Promoter Group of a listed company.**

Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai 400076 PAN :AAHPS243BK	95,39,350 (10.58 %)	18-12-2012	04-11-2017	Invocation of 3,50,000 pledged equity shares by ICICI Bank Limited	0.39 %					3,50,000	1,12,87,500

  
 Pankaj Kumar

**"FORM D"**

*Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992  
[Regulations 13(4), 13(4A) and 13(6)]*

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Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ advice/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	51,21,957 (5.67 %)	19-2-2013	04-11-2017	Invocation of 98,413 pledged equity shares by ICICI Bank Limited	0.11%					98,413	13,18,734.2

  
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**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

**Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Person who is part of Promoter Group of a listed company.**

Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	51,21,957 (5.67 %)	21-2-2013	04-11-2017	Invocation of 2,04,819 pledged equity shares by ICICI Bank Limited	0.23 %					2,04,819	28,26,502. 2

  
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**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

**Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Promoter or Person who is part of Promoter Group of a listed company.**

Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	95,39,350 (10.58%)	21-12-2012	04-11-2017	Invocation of 74,766 pledged equity shares by ICICI Bank Limited	0.08 %					74,766	22,72,886.4

  
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**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
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Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	95.39,350 (10.58 %)	24-12-2012	04-11-2017	Invocation of 2,43,602 pledged equity shares by ICICI Bank Limited	0.27 %					2,43,602	65,77,254

  
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**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

**Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Person who is part of Promoter Group of a listed company.**

Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai 400076 PAN :AAHPS243BK	51,21,957 (5.67 %)	26-2-2013	04-11-2017	Invocation of 36,510 pledged equity shares by ICICI Bank Limited	0.04 %					36,510	4,47,247.5

  
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**"FORM D"**  
*Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992*  
 [Regulations 13(4), 13(4A) and 13(6)]

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Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment advice/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	95,39,350 (10.58 %)	26-12-2012	04-11-2017	Invocation of 3,85,583 pledged equity shares by ICICI Bank Limited	0.43 %					3,85,583	99,09,483.1

  
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**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

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Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/ rights/ preferential offer, etc./ sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai 400076 PAN : AAHPS2438K	51,21,957 (5.67%)	27-2-2013	04-11-2017	Invocation of 91,143 pledged equity shares by ICICI Bank Limited	0.10 %					91,143	10,61,815.95

  
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**"FORM D"**  
*Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992*  
 [Regulations 13(4), 13(4A) and 13(6)]

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Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment advice/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai - 400076 PAN :AAHPS2438K	95,39,350 (10.58 %)	27-12-2012	04-11-2017	Invocation of 1,70,230 pledged equity shares by ICICI Bank Limited	0.19%					1,70,230	41,62,123.5

  
 Pankaj Kumar

**"FORM D"**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992**  
 [Regulations 13(4), 13(4A) and 13(6)]

**Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Person who is part of Promoter Group of a listed company.**

Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment/ advice/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc./sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell Value (Rs.)
Pankaj Kumar A -903, Lake Castle, Cliff Avenue, Hiranandani Garden, Powai, Mumbai 400076 PAN :AAHPS2438K	51,21,957 (5.67 %)	28-2-2013	04-11-2017	Invocation of 77,186 pledged equity shares by ICICI Bank Limited	0.09 %					77,186	8,56,542.6

  
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ANNEXURE-2

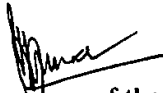
**Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Name of the Target Company (TC)	Geodesic Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Kiran Kulkarni Pankaj Kumar Prashant Mulekar Jayashree Mulekar Paramodini Mulekar Rajeshwari Kiran Kulkarni Veena Pankaj Kumar		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE/NSE		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
<b>Before the acquisition under consideration, holding of :</b>			
a) Shares carrying voting rights	1,34,62,081	14.91	
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	Pledge		
c) Voting rights (VR) otherwise than by shares			
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	97,40,237	10.79	
e) Total (a+b+c+d)			
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/sold	18,63,600	2.07	
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	18,58,244	2.05	
d) Shares encumbered / invoked/released by			

the acquirer e) Total (a+b+c+d)			
<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights	1,15,98,481	12.84	
b) Shares encumbered with the acquirer			
c) VRs otherwise than by shares			
d) 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	97,40,237	10.79	
e) Total (a+b+c+d)			
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Invocation of Pledge		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	30-01-2013 & 25-02-2013		
Equity share capital / total voting capital of the TC before the said acquisition / sale	9,03,27,847 shares / 9,03,27,847		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	9,03,27,847 shares / 9,03,27,847		
Total diluted share/voting capital of the TC after the said acquisition	NA		

(\*) 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.



**Signature of the acquirer / seller / Authorised Signatory**

Place: Mumbai

Date: 04/11/2017