

Date: 22.08.2024

Corporate Finance Department
The Securities and Exchange Board of India
SEBI Bhavan, Plot No. C4-A, 'G' Block,
Bandra Kurla Complex, Bandra (E),
Mumbai – 400 051

Dear Sir,

Subject: Submission of Report under Regulation of 10 (7) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Please find attached herewith the Report under Regulation of 10 (7) of SEBI (SAST) Regulations, 2011. The said Report is pertaining to acquisition of shares under Regulation of 10(1)(a)(i) in respect of transfer of shares by way of inter se transfer from Mr. Sahil Bansal and to Mr. Sanjeev Bansal.

Please find attached herewith the following:

Sr. No.	Particulars	Annexure
1	Report under Reg. 10 (7)	A
2	Report filed with BSE under Reg. 10 (5) dated 07.06.2024.	B
3	Report filed with BSE under Reg. 10 (6) dated 30.07.2024 and 14.08.2024.	C
4	Submission of Disclosure as required under Reg. 29(2) dated 30.07.2024 and 14.08.2024.	D
5	Submission of Form C by Acquirer under SEBI (Prohibition of Insider Trading) Regulations, 2015 by Company dated 30.07.2024 and 14.08.2024.	E
6	Submission of Form C by Transferor under SEBI (Prohibition of Insider Trading) Regulations, 2015 by Company dated 30.07.2024.	F
7	Submission of Form C by Transferor under SEBI (Prohibition of Insider Trading) Regulations, 2015 by Company dated 14.08.2024.	G
8	Cheque of Rs. 1,50,000/- in favour of SEBI towards fees payable as per Reg. 10(7). Payment Receipt No: 113428103607 Date : 2024-08-22	H



SANJEEV BANSAL
ACQUIRER

Format under Regulation 10(7) - Report to SEBI in respect of any acquisition made in reliance upon exemption provided for in Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1	General Details	
	a. Name, address, telephone no., e-mail of acquirer(s) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond.}	Name: Mr. Sanjeev Bansal Address: 662/2, Premjit Road, Gurdev Nagar, Ludhiana - 141002. M. No.: 9876363633 Email Id: sbansal1959@gmail.com
	b. Whether sender is the acquirer (Y/N)	Yes
	c. If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization)	Not Applicable
	d. Name, address, Tel no. and e-mail of the sender, if sender is not the acquirer	Not Applicable
2	Compliance of Regulation 10(7)	
	a. Date of Report	22.08.2024
	b. Whether report has been submitted to SEBI within 21 working days from the date of the Acquisition	Yes.
	c. Whether the report is accompanied with fees as required under Regulation 10(7)	Yes.
3	Compliance of Regulation 10(5)	
	a. Whether the report has been filed with the Stock Exchanges where the shares of the Company is listed, at least 4 working days before the date of the proposed acquisition	Yes.
	b. Date of Report	07.06.2024
4	Compliance of Regulation 10(6)	
	a. Whether the report has been filed with the Stock Exchanges where the shares of the Company is listed within 4 working days after the date of the proposed acquisition	Yes.
	b. Date of Report	Inter-se transfer from Mr. Salil Bansal on 30.07.2024. Inter-se transfer from Mr. Sahil Bansal on 14.08.2024.

S. Bansal

5 Details of the Target Company (TC)						
	a.	Name & address of TC	Name: PAOS Industries Limited Address: Village Pawa, G T Road, Near Civil, Airport, Ludhiana, Punjab, 141120			
	b.	Name of the Stock Exchange(s) where the shares of the TC are listed	BSE Limited			
6 Details of the acquisition						
	a.	Date of acquisition	From Mr. Salil Bansal as on 26.07.2024. From Mr. Sahil Bansal as on 13.08.2024.			
	b.	Acquisition price per share (in Rs.)	No consideration as the transaction was of Gift with Immediate Relative			
	c.	Regulation which would have triggered an Open offer, had the report not been filed under Regulation 10(7). (whether Regulation 3(1), 3(2), 4 or 5)	Regulation 3(2)			
	d.	Shareholding of acquirer(s) and PAC Individually in TC (in terms of no. & as a percentage of the total share/voting capital of the TC) (*)	Before the acquisition		After the acquisition	
			No. of Shares	% w.r.t total share capital of TC	No. of Shares	% w.r.t total share capital of TC
		Name of the acquirer: Mr. Sanjeev Bansal	2018150	33.065%	3727950	61.078%
		Total	2018150	33.065%	3727950	61.078%
	e.	Shareholding of seller/s in TC (in terms of no. & as a percentage of the total share/voting capital of the TC) (*)	Before the acquisition		After the acquisition	
			No. of Shares	% w.r.t total share capital of TC	No. of Shares	% w.r.t total share capital of TC
		Name of the seller(s) (**): Mr. Sahil Bansal	861700	14.118%	0	0
		Mr. Salil Bansal	848100	13.895%	0	0
7 Information specific to the exemption category to which the instant acquisition belongs- Regulation 10(1)(a)(i)						
	a.	Provide the names of the seller(s)	Mr. Sahil Bansal Mr. Salil Bansal			

Sanjeev

b.	Specify the relationship between the acquirer(s) and the seller(s).	Both the Sellers are Sons of Acquirer
c.	Confirm whether the acquirer(s) and the seller(s) are 'immediate relatives' as defined in the Regulation 2(l).	Yes
d.	If shares of the TC are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	Not applicable there is no consideration involved being a transaction of gift to immediate relative
e.	If the shares of the TC are infrequently traded, the price of such shares as determined in terms of clause (e) of sub-regulation (2) of Regulation 8.	Not applicable there is no consideration involved being a transaction of gift to immediate relative
f.	Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (d) or (e) above as applicable.	Not Applicable
g.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed	07.06.2024
h.	1) Whether the acquirers as well as sellers have complied (during 3 years prior to the date of acquisition) with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). 2) If yes, specify applicable regulation(s) as well as date on which the requisite disclosures were made and furnish copies of the same.	Not Applicable Not Applicable
i.	Declaration by the acquirer that all the conditions specified under Regulation 10(1)(a)(i) with respect to exemptions has been duly complied with	The Acquirer declares that all the conditions specified under Regulation 10 (1) (a) (i) with respect to exemptions has been duly complied with.

I hereby declare that the information provided in the instant report is true and nothing has been concealed there from.



SANJEEV BANSAL
ACQUIRER

Date: 22.08.2024.
Place: Ludhiana



(Annexure - B)

Intimation Under Regulation 10(5) In Respect of The Proposed Acquisition Under Regulation 10(1)(a)(ii) of The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011

1 message

Sanjeev Bansal <sbansal1959@gmail.com>

To: corp.relations@bseindia.com

Fri, 7 Jun 2024 at 16:14

Cc: sastexemptionapplication@sebi.gov.in, paosindustriesltd@gmail.com

Date: 07.06.2024

The Department of Corporate Services,

BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Scrip Code: 530291

Sub: Intimation Under Regulation 10(5) In Respect of The Proposed Acquisition Under Regulation 10(1)(a)(ii) of The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011

Dear Sir/Madam

The requisite intimation under Regulation 10(5) in respect of our proposed acquisition of 28.01% of the share capital of **PAOS Industries Limited** by way of gift of shares.

This being a transfer between co-promoters i.e. Mr. Sanjeev Bansal and Mr. Sahil Bansal/Mr. Salil Bansal, is exempt from the obligation to make an open offer under Regulation 3 and Regulation 4 as per the provisions of Regulation 10(1)(a)(ii) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011.

This is for your information and records.

Regards and Thanks
Sanjeev Bansal

Sent from my iPad

Sanjeev Bansal
662/2, Premjit Road, Gurdev Nagar,
Ludhiana - 141002. M. No.: 9876363633
Email Id: sbansal1959@gmail.com

Date: 07.06.2024

The Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Scrip Code: 530291

Sub: Intimation Under Regulation 10(5) In Respect of The Proposed Acquisition Under Regulation 10(1)(a)(ii) of The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011

Dear Sir/Madam

The requisite intimation under Regulation 10(5) in respect of our proposed acquisition of 28.01% of the share capital of **PAOS Industries Limited** by way of gift of shares.

This being a transfer between co-promoters i.e. Mr. Sanjeev Bansal and Mr. Sahil Bansal/Mr. Salil Bansal, is exempt from the obligation to make an open offer under Regulation 3 and Regulation 4 as per the provisions of Regulation 10(1)(a)(ii) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011.

This is for your information and records.



Sanjeev Bansal

CC: PAOS Industries Limited

Format for Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	PAOS Industries Limited (Scrip Code 530291 – BSE)
2.	Name of the acquirer(s)	Sanjeev Bansal
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its Promoters	Yes
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Sahil Bansal Salil Bansal
	b. Proposed date of acquisition	On or after 13.06.2024
	c. Number of shares to be acquired from each person mentioned in 4(a) above	a) Sahil Bansal - 861700 b) Salil Bansal – 848100
	d. Total shares to be acquired as % of share capital of TC	28.013 % of the share capital of TC
	e. Price at which shares are proposed to be Acquired	Zero consideration involved as it is a transaction of gift to immediate relative
	f. Rationale, if any, for the proposed transfer	Off Market transfer by way of gift: a) Sahil Bansal (Promoter) to his Father Sanjeev Bansal (Promoter) b) Salil Bansal (Promoter) to his Father Sanjeev Bansal (Promoter) The %age of Promoter Group shall remain as the acquirer being immediate relative is in the Promoters Group.
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open Offer	Regulation 10(1)(a)(ii)
6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.	Not applicable there is no consideration involved being a transaction of gift to immediate relative
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not applicable there is no consideration involved being a transaction of gift to immediate relative
8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	Not applicable there is no consideration involved being a transaction of gift to immediate relative

Sanjeev

9.	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)	I, hereby confirm, that the transferor and transferee have/will complied/comply with applicable disclosure requirements in chapter V of the Takeover Regulations, 2011.			
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	I, hereby confirm, that all the conditions specified under Regulation 10(1)(a) with respect to exemption have been duly complied with			
11.	Shareholding details	Before the Proposed Transaction		After the Proposed Transaction	
		No. of Shares /voting Rights	% w.r.t total share capital of TC	No. of Shares /voting Rights	% w.r.t Total Share Capital of TC
A	Acquirer(s) and PACs (other than sellers) (*)	As Per Annexure-A			
B	Seller (s)				

(*) Shareholding of each entity may be shown separately and then collectively in a group. The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.



Sanjeev Bansal

Date: 07.06.2024

Place: Ludhiana

Annexure-A to Format for Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Shareholding Details		Before Proposed Transaction		After the proposed transaction	
A	Acquirer and PAC (Other than Seller)	Number of Shares	% w.r.t. total Share capital of TC	Number of Shares	% w.r.t. total Share capital of TC
	Promoter & Promoter Group				
	Mr. Sanjeev Bansal (Immediate Relative) - Acquirer	2018150	33.065	3727950	61.078

B	Seller/Transferor	Number of Shares	% w.r.t. total Share capital of TC	Number of Shares	% w.r.t. total Share capital of TC
	Promoter & Promoter Group				
	Sahil Bansal (Immediate Relative)	861700	14.118	0	0
	Salil Bansal (Immediate Relative)	848100	13.895	0	0
	Total	1709800	28.013	0	0



Sanjeev Bansal

Date: 07.06.2024

Place: Ludhiana



(Annexure-C)

Disclosure under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1 message

Sanjeev Bansal <sbansal1959@gmail.com>

Tue, 30 Jul 2024 at 17:12

To: sastexemptionapplication@sebi.gov.in, corp.relations@bseindia.com, corp.compliance@bseindia.com

Cc: paosindustriesltd@gmail.com

I, Sanjeev Bansal, Promoter of PAOS Industries Limited, hereby submit disclosures under the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and the SEBI (Prohibition of Insider Trading) Regulations, 2015. These disclosures are in relation to the acquisition of shares via promoter inter-se share transfer.

I request that you kindly take note of this submission and keep it on record for future reference.

Thank you for your attention to this matter.

Sincerely,
Sanjeev Bansal
Promoter, PAOS Industries Limited"

Sanjeev Bansal
662/2, Premjit Road, Gurdev Nagar,
Ludhiana - 141002. M. No.: 9876363633
Email Id: sbansal1959@gmail.com

Date: 30.07.2024

The Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Scrip Code: 530291

Sub: Intimation Under Regulation 10(6) In Respect of The Proposed Acquisition Under Regulation 10(1)(a)(i) of The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011

Dear Sir/Madam

The requisite intimation under Regulation 10(6) in respect of my acquisition of 13.895% of the share capital of PAOS Industries Limited by way of gift of shares

from Mr. Salil Bansal 848100 shares

This being a transfer to 'Immediate Relative', acquirer Mr. Sanjeev Bansal is the father of Mr. Salil Bansal, is exempt from the obligation to make an open offer under Regulation 3 and Regulation 4 as per the provisions of Regulation 10(1)(a)(i) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011.

This is for your information and records.



Sanjeev Bansal

CC: PAOS Industries Limited

Format for Disclosures under Regulation 10(6) – Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

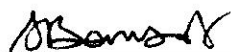
1.	Name of the Target Company (TC)	PAOS Industries Limited			
2.	Name of the acquirer(s)	SANJEEV BANSAL			
3.	Name of the stock exchange where shares of the TC are listed	BSE LIMITED			
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	INTER SE TRANSFER TO IMMEDIATE RELATIVE (TRANSFER BETWEEN THE MEMBERS OF PROMOTER GROUP)			
5.	Relevant regulation under which the acquirer is exempted from making open offer.	10 (1) (a) (i)			
6.	Whether disclosure of proposed acquisition was required to be made under regulation 10 (5) and if so, - whether disclosure was made and whether it was made within the timeline specified under the regulations. - date of filing with the stock exchange.	Yes 07.06.2024			
7.	Details of acquisition	Disclosures required to be made under regulation 10(5)	Whether the disclosures under regulation 10(5), are actually made		
	a. Name of the transferor / seller	Salil Bansal	Yes		
	b. Date of acquisition	26.07.2024			
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	Salil Bansal - 848100			
	d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	13.895%			
	e. Price at which shares are proposed to be acquired / actually acquired	Not Applicable being gift without consideration			
8.	Shareholding details	Pre-Transaction		Post-Transaction	
		No. of shares held	% w.r.t total share capital of TC	No. of shares held	% w.r.t total share capital of TC
	a Each Acquirer / Transferee (*)				
	Sanjeev Bansal	2018150	33.065%	2866250	46.95%
	b Each Seller / Transferor				
	Salil Bansal	848100	13.895%	0	0

Bansal

Details holding of the promoter and PAC after acquisition:

	Shareholding Detail	Before Proposed Transaction		After the Proposed Transaction	
		Number of Shares	% w.r.t. total Share capital of TC	Number of Shares	% w.r.t. total Share capital of TC
1	Sanjeev Bansal (Immediate Relative) - Acquirer	2018150	33.065	2866250	46.95
2	Sahil Bansal	861700	14.118	8617000	14.118
3	Salil Bansal (Immediate Relative) - Transferor	848100	13.895	0	0.000
4	Rama Bansal	743750	12.185	743750	12.185
5	Deshbandhu Ramnath Gupta	12600	0.206	12600	0.206
6	Megha Kansal	7800	0.128	7800	0.128
7	Sham Bansal	1000	0.016	1000	0.016
8	Raj Soaps & Detergents Private Limited	66900	1.096	66900	1.096
	Total	4560000	74.710	4560000	74.710

Note: As this is the Inter Se Transfer between the members of promoter group from Mr. Sanjeev Bansal and Mr. Sahil Bansal/Mr. Salil Bansal, all being immediate relatives. There is no change in the promoter group holding after the above said transaction.



Sanjeev Bansal

Date: 30.07.2024

Place: Ludhiana

Sanjeev Bansal
662/2, Premjit Road, Gurdev Nagar,
Ludhiana - 141002. M. No.: 9876363633
Email Id: sbansal1959@gmail.com

Date: 14.08.2024

The Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Scrip Code: 530291

Sub: Intimation Under Regulation 10(6) In Respect of The Proposed Acquisition Under Regulation 10(1)(a)(i) of The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011

Dear Sir/Madam

The requisite intimation under Regulation 10(6) in respect of my acquisition of 14.117% of the share capital of PAOS Industries Limited by way of gift of shares

from **Mr. Sahil Bansal** 861700 shares

This being a transfer to 'Immediate Relative', acquirer Mr. Sanjeev Bansal is the father of Mr. Sahil Bansal, is exempt from the obligation to make an open offer under Regulation 3 and Regulation 4 as per the provisions of Regulation 10(1)(a)(i) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011.

This is for your information and records.



Sanjeev Bansal

CC: PAOS Industries Limited

Format for Disclosures under Regulation 10(6) – Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	PAOS Industries Limited			
2.	Name of the acquirer(s)	SANJEEV BANSAL			
3.	Name of the stock exchange where shares of the TC are listed	BSE LIMITED			
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	INTER SE TRANSFER TO IMMEDIATE RELATIVE (TRANSFER BETWEEN THE MEMBERS OF PROMOTER GROUP)			
5.	Relevant regulation under which the acquirer is exempted from making open offer.	10 (1) (a) (i)			
6.	Whether disclosure of proposed acquisition was required to be made under regulation 10 (5) and if so, - whether disclosure was made and whether it was made within the timeline specified under the regulations. - date of filing with the stock exchange.	Yes 07.06.2024			
7.	Details of acquisition	Disclosures required to be made under regulation 10(5)	Whether the disclosures under regulation 10(5) are actually made		
	a. Name of the transferor / seller	Sahil Bansal	Yes		
	b. Date of acquisition	13.08.2024			
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	Sahil Bansal – 861700			
	d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	14.117%			
	e. Price at which shares are proposed to be acquired / actually acquired	Not Applicable being gift without consideration			
8.	Shareholding details	Pre-Transaction		Post-Transaction	
		No. of shares held	% w.r.t total share capital of TC	No. of shares held	% w.r.t total share capital of TC
	a Each Acquirer / Transferee (*)				
	Sanjeev Bansal	2866250	46.950%	3727950	61.078%
	b Each Seller / Transferor				
	Sahil Bansal	861700	14.118%	0	0

S. Bansal

Details holding of the promoter and PAC after acquisition:

	Shareholding Detail	Before Proposed Transaction		After the Proposed Transaction	
		Number of Shares	% w.r.t. total Share capital of TC	Number of Shares	% w.r.t. total Share capital of TC
1	Sanjeev Bansal (Immediate Relative) - Acquirer	2866250	46.950	3727950	61.078
2	Sahil Bansal	861700	14.118	0	0.000
3	Salil Bansal (Immediate Relative) - Transferor	0	0.000	0	0.000
4	Rama Bansal	743750	12.185	743750	12.185
5	Deshbandhu Ramnath Gupta	12600	0.206	12600	0.206
6	Megha Kansal	7800	0.128	7800	0.128
7	Sham Bansal	1000	0.016	1000	0.016
8	Raj Soaps & Detergents Private Limited	66900	1.096	66900	1.096
	Total	4560000	74.710	4560000	74.710

Note: As this is the Inter Se Transfer between the members of promoter group from Mr. Sanjeev Bansal and Mr. Sahil Bansal all being immediate relatives. There is no change in the promoter group holding after the above said transaction.



Sanjeev Bansal

Date: 14.08.2024

Place: Ludhiana



(Annexure-D)

Disclosure under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1 message

Sanjeev Bansal <sbansal1959@gmail.com>

Fri, 16 Aug 2024 at 16:29

To: sastexemptionapplication@sebi.gov.in, corp.compliance@bseindia.com, corp.relations@bseindia.com

Cc: paosindustriesltd@gmail.com

I, Sanjeev Bansal, Promoter of PAOS Industries Limited, hereby submit disclosures under the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and the SEBI (Prohibition of Insider Trading) Regulations, 2015. These disclosures are in relation to the acquisition of shares via promoter inter-se share transfer.

I request that you kindly take note of this submission and keep it on record for future reference.

Thank you for your attention to this matter.

Sincerely,
Sanjeev Bansal
Promoter, PAOS Industries Limited"

Sanjeev Bansal
Salil Bansal
662/2, Premjit Road, Gurdev Nagar,
Ludhiana - 141002

Date: 30.07.2024

The Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001


Scrip Code: 530291

Subject: Disclosure Under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Please find attached herewith the Disclosure under Regulation of 29(2) of SEBI (SAST) Regulations, 2011 in respect of transfer of shares by way of inter se transfer from Mr. Salil Bansal to Mr. Sanjeev Bansal.



SANJEEV BANSAL
ACQUIRER



SALIL BANSAL
TRANSFEROR

CC: PAOS Industries Limited

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

Name of the Target Company (TC)

PAOS Industries Limited

Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer

Acquirer – Sanjeev Bansal

Persons Acting in Concert (PAC)
Sanjeev Bansal (Immediate Relative) – Acquirer
Sahil Bansal
Sailil Bansal (Immediate Relative) – Transferor
Rama Bansal
Deshbandhu Ramnath Gupta
Megha Kansal
Sham Bansal
Raj Soaps & Detergents Private Limited

Whether the acquirer belongs to Promoter/Promoter group

YES

Name(s) of the Stock Exchange(s) where the shares of TC are Listed

BSE Limited

Details of the acquisition / disposal as follows

Before the acquisition under consideration, holding of:

a) Shares carrying voting rights

	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/voting capital of the TC (**)
a) Shares carrying voting rights	4560000	74.71	74.71
(along with PAC)			
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 shares carrying voting rights in the T C (specify holding in each category)	--	--	--
e) Total (a+b+c+d)	4560000	74.71	74.71

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 shares carrying voting rights in the T C (specify holding in each category)

e) Total (a+b+c+d)

Sanjeev Bansal

Sahil Bansal

Details of acquisition/sale

a) Shares carrying voting rights acquired/sold

Net of Acquisition & Sale is Nil as 848100 is Inter se Transfer	Net of Acquisition & Sale is Nil as 13.895% is Inter se Transfer	Net of Acquisition & Sale is Nil as 13.895% is Inter se Transfer
---	--	--

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

Nil Nil Nil

e) Total (a+b+c+/-d)

Bansal

Saty D

After the acquisition/sale, holding of:

a) Shares carrying voting rights	4560000 (along with PAC)	74.71	74.71
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	--	--	--
e) Total (a+b+c+d)	4560000	74.71	74.71

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc). Inter Se Transfer – (Within Promoter group)

Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable 26.07.2024

Equity share capital / total voting capital of the TC before the said acquisition / sale 6103600 equity shares of Rs. 10 each


Equity share capital/ total voting capital of the TC after the said acquisition / sale 6103600 equity shares of Rs. 10 each

Total diluted share/voting capital of the TC after the said acquisition 6103600 equity shares of Rs. 10 each

(*) 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


Sanjeev Bansal
(Acquirer/Transferee)


Saliil Bansal
(Seller/Transferor)

Date: 30.07.2024
Place: Ludhiana

Sanjeev Bansal
Sahil Bansal
662/2, Premjit Road, Gurdev Nagar,
Ludhiana - 141002

Date: 14.08.2024

The Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Scrip Code: 530291

**Subject: Disclosure Under Regulation 29(2) of SEBI (Substantial Acquisition of Shares
and Takeover) Regulations, 2011**

Please find attached herewith the Disclosure under Regulation of 29(2) of SEBI (SAST) Regulations, 2011 in respect of transfer of shares by way of inter se transfer from Mr. Sahil Bansal to Mr. Sanjeev Bansal.



SANJEEV BANSAL
ACQUIRER



SAHIL BANSAL
TRANSFEROR

CC: PAOS Industries Limited

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

Name of the Target Company (TC) PAOS Industries Limited

Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer Acquirer – Sanjeev Bansal

Persons Acting in Concert (PAC)
Sanjeev Bansal (Immediate Relative) – Acquirer
Sahil Bansal (Immediate Relative) – Transferor
Salil Bansal
Rama Bansal
Deshbandhu Ramnath Gupta
Megha Kansal
Sham Bansal
Raj Soaps & Detergents Private Limited

Whether the acquirer belongs to Promoter/Promoter group

A.
YES

Name(s) of the Stock Exchange(s) where the shares of TC are Listed

BSE Limited

Details of the acquisition / disposal as follows

Before the acquisition under consideration, holding of:

	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/voting capital of the TC (**)
a) Shares carrying voting rights	4560000 (along with PAC)	74.71	74.71
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 shares carrying voting rights in the T C (specify holding in each category)	--	--	--
e) Total (a+b+c+d)	4560000	74.71	74.71

Sanjeev Bansal

Bansal

Details of acquisition/sale a) Shares carrying voting rights acquired/sold	Net of Acquisition & Sale is Nil as 861700 is Inter se Transfer	Net of Acquisition & Sale is Nil as 14.117% is Inter se Transfer	Net of Acquisition & Sale is Nil as 14.117% is Inter se Transfer
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	Nil	Nil	Nil
e) Total (a+b+c+/-d)			

Bansal

Bansal

After the acquisition/sale, holding of:

a) Shares carrying voting rights	4560000 (along with PAC)	74.71	74.71
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	--	--	--
e) Total (a+b+c+d)	4560000	74.71	74.71

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc). Inter Se Transfer – (Within Promoter group)

Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable 13.08.2024

Equity share capital / total voting capital of the TC before the said acquisition / sale 6103600 equity shares of Rs. 10 each

Equity share capital/ total voting capital of the TC after the said acquisition / sale 6103600 equity shares of Rs. 10 each

Total diluted share/voting capital of the TC after the said acquisition 6103600 equity shares of Rs. 10 each

(* 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



Sanjeev Bansal
(Acquirer/Transferee)



Sahil Bansal
(Seller/Transferor)

Date: 14.08.2024

Place: Ludhiana

(Annexure - E)

Sanjeev Bansal
662/2, Premjit Road, Gurdev Nagar,
Ludhiana - 141002. M. No.: 9876363633
Email Id: sbansal1959@gmail.com

Date: 30.07.2024

PAOS Industries Limited
Village Pawa, G T Road, Near Civil Airport,
Ludhiana, Punjab, 141120

Scrip Code: 530291

**Subject: Disclosure Under Regulation 7(2)a of SEBI (Prohibition of Insider Trading)
Regulations, 2015**

Please find attached herewith the Disclosure under Regulation 7(2)a of SEBI (Prohibition of Insider Trading) Regulations, 2015 in respect of transfer of shares by way of inter se transfer to Mr. Sanjeev Bansal from Mr. Salil Bansal.



SANJEEV BANSAL
ACQUIRER

FORM C
(Acquirer)

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: PAOS Industries Limited
ISIN of the company: INE791C01012

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Directors/im mediate relative to/others etc.)	Securities held prior to acquisition		Securities acquired			
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. Shares, Warrants, Converti ble Debentur es etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)
1	2	3	4	5	6	7	8
Sanjeev Bansal PAN: AAWPB1807E 662/2, Premjit Road, Gurdev Nagar, Ludhiana - 141002. M. No.: 9876363633 Email Id: sbansal1959@gmail.com	Promoter	Equity Shares	2018150 (33.065%)	Equity Shares	848100	Nil	Received gift

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.



Securities held post-acquisition		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
9	10	11	12	13	14
Equity	2866250 (46.95%)	26.07.2024	26.07.2024	30.07.2024	Off Market/Inter Se Transfer


Sanjeev Bansal

Date: 30.07.2024
Place: Ludhiana

Sanjeev Bansal
662/2, Premjit Road, Gurdev Nagar,
Ludhiana - 141002. M. No.: 9876363633
Email Id: sbansal1959@gmail.com

Date: 14.08.2024

PAOS Industries Limited
Village Pawa, G T Road, Near Civil Airport,
Ludhiana, Punjab, 141120

Scrip Code: 530291
Subject: Disclosure Under Regulation 7(2)a of SEBI (Prohibition of Insider Trading)
Regulations, 2015

Please find attached herewith the Disclosure under Regulation 7(2)a of SEBI (Prohibition of Insider Trading) Regulations, 2015 in respect of transfer of shares by way of inter se transfer to Mr. Sanjeev Bansal from Mr. Sahil Bansal.



SANJEEV BANSAL
ACQUIRER

FORM C
(Acquirer)

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: PAOS Industries Limited
ISIN of the company: INE791C01012

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Directors/im mediate relative to/others etc.)	Securities held prior to acquisition		Securities acquired			
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. Shares, Warrants, Converti ble Debentur es etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)
1	2	3	4	5	6	7	8
Sanjeev Bansal PAN: AAWPB1807E 662/2, Premjit Road, Gurdev Nagar, Ludhiana - 141002. M. No.: 9876363633 Email Id: sbansal1959@gmail.com	Promoter	Equity Shares	2866250 (46.95%)	Equity Shares	861700	Nil	Received gift

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.



Securities held post-acquisition		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
9	10	11	12	13	14
Equity	3727950 (61.078%)	13.08.2024	13.08.2024	14.08.2024	Off Market/Inter Se Transfer



Sanjeev Bansal

Date: 14.08.2024

Place: Ludhiana

Salil Bansal
662/2, Premjit Road, Gurdev Nagar,
Ludhiana - 141002. M. No.: 9876363634
Email Id: salil.bansal@rajindgroup.in


Date: 30.07.2024

PAOS Industries Limited
Village Pawa, G T Road, Near Civil Airport,
Ludhiana, Punjab, 141120

Scrip Code: 530291

Subject: Disclosure Under Regulation 7(2)a of SEBI (Prohibition of Insider Trading) Regulations, 2015

Please find attached herewith the Disclosure under Regulation 7(2)a of SEBI (Prohibition of Insider Trading) Regulations, 2015 in respect of transfer of shares by way of inter se transfer to Mr. Sanjeev Bansal from Mr. Salil Bansal.


SALIL BANSAL
TRANSFEROR

FORM C
(Transferor)

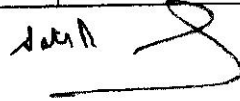
SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: PAOS Industries Limited
ISIN of the company: INE791C01012

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Director s/immediate relative to/others etc.)	Securities held prior to disposal		Securities Disposed			
		Type of security (For eg. Shares, Warrants, Convertible, Debentures etc.)	No. and % of shareholding	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)
1	2	3	4	5	6	7	8
Salil Bansal PAN: AGEPB7016K 662/2, Premjit Road, Gurdev Nagar, Ludhiana - 141002. M.No. 9876363634 Email ID: salil.bansal@rajindgroup.in	Promoter	Equity Shares	848100 (13.895%)	Equity Shares	848100	Nil	Given as gift

Salil



Securities held post disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
Type of security (For e.g. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
9	10	11	12	13	14
Equity	0 (0%)	26.07.2024	26.07.2024	30.07.2024	Off Market/ Inter Se Transfer


Salil Bansal

Date: 30.07.2024
Place: Ludhiana

(Annexure - G)

Sahil Bansal

662/2, Premjit Road, Gurdev Nagar,
Ludhiana - 141002. M. No.: 9876363635
Email Id: sahil.bansal@rajindgroup.in

Date: 14.08.2024

PAOS Industries Limited
Village Pawa, G T Road, Near Civil Airport,
Ludhiana, Punjab, 141120

Scrip Code: 530291

**Subject: Disclosure Under Regulation 7(2)a of SEBI (Prohibition of Insider Trading)
Regulations, 2015**

Please find attached herewith the Disclosure under Regulation 7(2)a of SEBI (Prohibition of Insider Trading) Regulations, 2015 in respect of transfer of shares by way of inter se transfer to Mr. Sanjeev Bansal from Mr. Sahil Bansal.



SAHIL BANSAL
TRANSFEROR

FORM C
(Transferor)

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

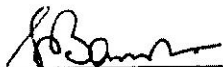
Name of the company: PAOS Industries Limited
ISIN of the company: INE791C01012

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Director s/immediate relative to/others etc.)	Securities held prior to disposal		Securities Disposed			
		Type of security (For eg. Shares, Warrants, Convertible, Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)
1	2	3	4	5	6	7	8
Sahil Bansal PAN: ABDPB1291L 662/2, Premjit Road, Gurdev Nagar, Ludhiana - 141002. M.No. 0987636335 Email ID: sahil.bansal@rajindgroup.in	Promoter	Equity Shares	861700 (14.118%)	Equity Shares	861700	Nil	Given as gift

Sahil Bansal

Securities held post disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
Type of security (For e.g. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
9	10	11	12	13	14
Equity	0 (0%)	13.08.2024	13.08.2024	14.08.2024	Off Market/ Inter Se Transfer


Sahil Bansal

Date: 14.08.2024
Place: Ludhiana

Receipt : 113428103607

Date : 2024-08-22 11:57:57

Payer Details

Name of the Payer : SANJEEV BANSAL
Pan Card Number : AXXXXX07E
Mobile No : 9876363633
Email ID : Sbansal1959@gmail.com
Address : 662 Premjit Road Gurdev Nagar Ludhiana
Pincode : 141002
State : Punjab
Type of fee : Fee under Regulation 10 (7) of SAST Regulations
Specify if you are a registered with GST ? : No
GST Number :
State where GST is registered :
Other Remarks : Sanjeev Bansal Promoter acquired shares of Paos Industries Ltd from Sahil Bansal and Salil Bansal as off market promoter inter se transfer

Fees Details

Enter Fee Amount : 150000
SGST : 0
CGST : 0
IGST : 27000
Total Amount : 177000

Payment Details

Order ID : 3794666
Tracking ID : 113428103607
Currency : INR
Payment Mode : Credit Card
Card Name : MasterCard

