

O.C

**ARCHANA SANKHOLKAR**

C-7, Kapil Malhar Bungalows, Baner Road, Pune, Maharashtra – 411045

Email: [archu\\_kamat@hotmail.com](mailto:archu_kamat@hotmail.com)

Date: December 31, 2024

To,  
**Securities and Exchange Board of India**  
Plot No. C4-A, 'G' Block  
Bandra Kurla Complex, Bandra (East)  
Mumbai – 400051

CC,  
To,  
**BSE Limited**  
Compliance Department  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort  
Mumbai – 400001.

To,  
**National Stock Exchange of India Limited**  
Plot No. C/1, "6" Block, Exchange Plaza  
Bandra Kurla Complex, Bandra (East)  
Mumbai - 400051

To,  
**The Company Secretary / Compliance officer,**  
**Fine Organic Industries Limited,**  
(Security Code: 541557, Symbol: FINEORG)  
Fine House, M. G. Road,  
Ghatkopar (East), Mumbai – 400077

Dear Sir(s)/ Madam,

Sub: Disclosures under Regulation 10(7) Securities Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Pursuant to Regulation 10(7) of the Securities Exchange Board of India (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 ('the Regulations'), please find enclosed herewith the necessary disclosure in the prescribed format for inter-se transfer of shares amongst the existing promoter and promoter group members.

The necessary intimation under Regulations 10(5) and 10(6) of the Regulations for the said acquisition, in the prescribed format, has already been submitted to the stock exchanges vide letter dated December 17, 2024 and December 26, 2024 respectively.

Please find attached Demand Draft No. 017961 of Rs. 1,77,000/- (Rupees One Lakh Seventy-Seven Thousand Only) (comprising of Rs.1,50,000/- plus GST @ 18%) dated December 17, 2024 payable in Mumbai in favour of the 'Securities and Exchange Board of India' towards the prescribed fees as per aforesaid Regulation 10(7).



**ARCHANA SANKHOLKAR**

C-7, Kapil Malhar Bungalows, Baner Road, Pune, Maharashtra – 411045  
Email: [archu\\_kamat@hotmail.com](mailto:archu_kamat@hotmail.com)

Kindly take the information on record.

Thanking you,



**Archana Sankholkar**  
**(Promoter of Fine Organic Industries Limited)**  
**(Acquirer 1)**

Encl: As above

# ARCHANA SANKHOLKAR

C-7, Kapil Malhar Bungalows, Baner Road, Pune, Maharashtra – 411045

Email: archu\_kamat@hotmail.com

**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) and 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

<b>1 General Details</b>		
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: ARCHANA SANKHOLKAR (Acquirer 1) Address: C-7, Kapil Malhar Bungalows, Baner Road, Pune, Maharashtra - 411045 Contact No: 09823515094 E-mail: archu_kamat@hotmail.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
<b>2 Compliance of Regulation 10(7)</b>		
a.	Date of report	December 31, 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
<b>3 Compliance of Regulation 10(5)</b>		
a.	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed, at least 4 working days before the date of the proposed acquisition	Yes A copy of the report under Regulation 10(5) is attached as Annexure I.
b.	Date of Report	December 17, 2024
<b>4 Compliance of Regulation 10(6)</b>		
a.	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed within 4 working days after the date of the proposed acquisition	Yes A copy of the report under Regulation 10(6) is attached as Annexure II.
b.	Date of Report	December 26, 2024
<b>5 Details of the Target Company (TC)</b>		
a.	Name & address of TC	Fine Organic Industries Limited, Fine House, M. G. Road, Ghatkopar (East), Mumbai – 400077
b.	Name of the Stock Exchange(s) where the shares of the TC are listed	BSE Ltd and National Stock Exchange of India Ltd.
<b>6 Details of the acquisition</b>		
a.	Date of acquisition	December 24, 2024
b.	Acquisition price per share (in Rs.)	Nil (No consideration since, it is an Inter-se transfer amongst the promoter members forming part of Promoter/Promoter Group by way of Partition of P D Kamat HUF)
c.	Regulation which would have been triggered an open offer, had the report not been filed under Regulation 10(7). (whether Regulation 3(1), 3(2), 4 or 5)	Not Applicable

## ARCHANA SANKHOLKAR

C-7, Kapil Malhar Bungalows, Baner Road, Pune, Maharashtra – 411045

Email: [archu\\_kamat@hotmail.com](mailto:archu_kamat@hotmail.com)

	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(s)	As per Annexure III	
	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)	As per Annexure III	
<b>7(A)</b>	<b>Information specific to the exemption category to which the instant acquisition belongs- Regulation 10(1)(a)(i)</b>			
	a.	Provide the names of the seller(s)	P D Kamat HUF (Karta – Archana Sankholkar)	
	b.	Specify the relationship between the acquirer(s) and the seller(s).	The Acquirers - Ms. Archana Sankholkar and Ms. Anjali Patil are sisters. Ms. Archana Sankholkar is Karta and Ms. Anjali Patil is the coparcener of transferor P D Kamat HUF	
	c.	Confirm whether the acquirer(s) and the seller(s) are 'immediate relatives' as defined in the Regulation 2(1).	This is to confirm that acquirer(s) and the seller are immediate relatives	
	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.	Volume weighted average market price for a period of 60 trading days for NSE – Rs.5049.90 BSE – Rs.5048.32	
	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	
	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.	The Acquirer confirms that acquisition price would not be higher by more than 25% of the price as computed in d. above.	
	g.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	December 17, 2024	
	h.	Whether the acquirers as well as sellers have complied with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). If yes, specify applicable regulation(s) as well as date on which the requisite disclosures were made	The total shares acquired by the Acquirer is representing 0.45% of the paid-up share capital of the Target Company. Since the change in holding is not exceeding 2%, the disclosure provisions under Chapter V are not applicable to the present transaction.	

## ARCHANA SANKHOLKAR

C-7, Kapil Malhar Bungalows, Baner Road, Pune, Maharashtra – 411045

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		along with the copies of the same.					
	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.	Acquirer hereby declares that all the conditions specified under Regulation 10(1)(a)(i) with respect to exemption have been duly complied with.				
<b>7(B) Information specific to the exemption category to which the instant acquisition belongs- Regulation 10(1)(a)(ii)</b>							
	a.	Provide the names of the seller(s)	P D Kamat HUF (Karta – Archana Sankholkar)				
	b.	Specify the relationship between the acquirer(s) and the seller(s).	The Acquirers - Ms. Archana Sankholkar and Ms. Anjali Patil are sisters. Ms. Archana Sankholkar is Karta and Ms. Anjali Patil is the coparcener of transferor P D Kamat HUF				
	c.	Shareholding of the acquirer and the seller/s in the TC during the three years prior to the proposed acquisition	Year – 1 (2022)	Year – 2 (2023)	Year – 3 (2024)		
Acquirer(s):							
Ms. Archana Sankholkar			22,26,418 (7.26%)	22,26,418 (7.26%)	22,26,418 (7.26%)		
Ms. Anjali Patil			22,26,417 (7.26%)	22,26,417 (7.26%)	22,26,417 (7.26%)		
Seller – P D Kamat HUF			1,37,178 (0.45%)	1,37,178 (0.45%)	1,37,178 (0.45%)		
	d.	Confirm that the acquirer(s) and the seller/s have been named promoters in the shareholding pattern filed by the target company in terms of the listing agreement or the Takeover Regulations. Provide copies of such filings under the listing agreement or the Takeover Regulations	I hereby confirm that acquirer and sellers have been named as Promoter and Promoter Group in the shareholding pattern filed by the TC.  Copies of shareholding pattern filed by the TC for the last two quarters are enclosed herewith as Annexure IV and Annexure V.				
	e.	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.	Volume weighted average market price for a period of 60 trading days for  NSE – Rs.5049.90  BSE – Rs.5048.32				
	f.	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				
	g.	Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (e) or (f) above as applicable.	The Acquirer confirms that acquisition price would not be higher by more than 25% of the price as computed in e. above.				
	h.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	December 17, 2024				

## ARCHANA SANKHOLKAR

C-7, Kapil Malhar Bungalows, Baner Road, Pune, Maharashtra – 411045  
Email: [archu\\_kamat@hotmail.com](mailto:archu_kamat@hotmail.com)

i.	Whether the acquirers as well as sellers have complied with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). If yes, specify applicable regulation(s) as well as date on which the requisite disclosures were made along with the copies of the same.	The total shares acquired by the Acquirer is representing 0.45% of the paid-up share capital of the Target Company. Since the change in holding is not exceeding 2%, the disclosure provisions under Chapter V are not applicable to present transaction.
j.	Declaration by the acquirer that all the conditions specified under Regulation 10(1)(a)(ii) with respect to exemptions has been duly complied with.	Acquirer hereby declares that all the conditions specified under Regulation 10(1)(a)(ii) with respect to exemption have been duly complied with.

The following abbreviations have been used all through the document: TC stands for 'Target Company', 'Takeover Regulations' stands for 'SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.

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



**Archana Sankholkar**  
**(Promoter of Fine Organic Industries Limited)**  
**(Acquirer 1)**

Encl: as stated

Date: December 17, 2024

To,  
**BSE Limited**  
 Compliance Department  
 Phiroze Jeejeebhoy Towers,  
 Dalal Street, Fort  
 Mumbai – 400001.

From,  
**Archana Sankholkar**  
 C-7, Kapil Malhar Bungalows, Baner Road,  
 Pune, Maharashtra - 411045  
 Email: [archu\\_kamat@hotmail.com](mailto:archu_kamat@hotmail.com)

To,  
**National Stock Exchange of India Limited**  
 Plot No. C/1, "6" Block, Exchange Plaza  
 Bandra Kurla Complex, Bandra (East)  
 Mumbai - 400 051

**Anjali Patil**  
 12/A, Popco CHSL, Fisheries Univ Road,  
 Andheri (West), Mumbai - 400061  
 Email: [anjukamat14@gmail.com](mailto:anjukamat14@gmail.com)

CC,  
 To  
**The Company Secretary / Compliance officer,**  
**Fine Organic Industries Limited,**  
**(Security Code: 541557, Symbol: FINEORG)**  
 Fine House, M. G. Road,  
 Ghatkopar (East), Mumbai – 400077

Dear Sir/ Madam,

**Sub: Disclosures under Regulation 10(5) – Intimation in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Pursuant to Regulation 10(1)(a) and 10(5) of Securities Exchange Board of India (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 ("the Regulations"), please find enclosed herewith – Intimation under Regulation 10(5) of the Regulations in the prescribed format for inter-se transfer of shares amongst the existing promoter and promoter group entities of the Company details of which are as follows:

Sr. No.	Name of the person(s) - Transferee / Acquirer	No. of Shares proposed to be acquired	% of Holding	Name of the person(s) Transferor /Seller	Date of Proposed Transactions
1.	Acquirer 1: Archana Sankholkar	68,589	0.22	P D Kamat HUF (Karta – Archana Sankholkar)	On or after December 24, 2024
2.	Acquirer 2: Anjali Patil	68,589	0.22		

The above is an inter-se transfer of shares by way of Partition of P D Kamat HUF through an off-market transaction in compliance with Regulation 10(1)(a)(i) and 10(1)(a)(ii) of the SEBI (SAST) Regulations, 2011.

The aggregate holding of Promoter and Promoter Group before and after the above 'Inter Se' transfer, shall remain the same.

Kindly take the information on record.

Thanking you,

*A.Y. Sankholkar*

**Archana Sankholkar**  
**(Promoter of Fine Organic Industries Limited)**  
**(Acquirer 1)**

*A.K. Patil*

**Anjali Patil**  
**(Promoter of Fine Organic Industries Limited)**  
**(Acquirer 2)**

Encl: As above



**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)	Fine Organic Industries Limited
2.	Name of the acquirer(s)	1. Acquirer 1: Archana Sankholkar 2. Acquirer 2: Anjali Patil
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, the acquirers are promoters of the TC prior to the transaction.
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	P D Kamat HUF (Karta – Archana Sankholkar)
	b. Proposed date of acquisition	On or after December 24, 2024 i.e. post 4 working days from the date of this disclosure.
	c. Number of shares to be acquired from each person mentioned in 4(a) above	Upto 1,37,178 equity shares from P D Kamat HUF (Karta – Archana Sankholkar) as below: 1. 68,589 Equity shares by Archana Sankholkar 2. 68,589 Equity shares by Anjali Patil
	d. Total shares to be acquired as % of share capital of TC	0.45% of share capital of TC from P D Kamat HUF (Karta – Archana Sankholkar)
	e. Price at which shares are proposed to be acquired	Nil. (No consideration since, it is a Inter-se transfer of shares through an off- market transaction amongst Promoter/ Promoters Group by way of Partition of P D Kamat HUF.)
	f. Rationale, if any, for the proposed transfer	Inter-se transfer of shares through an off- market transaction amongst Promoter/ Promoters Group by way of Partition of P D Kamat HUF.)
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Regulation 10(1)(a) (i) - acquisition pursuant to inter se transfer of shares amongst qualifying persons, being immediate relatives and Regulation 10(1)(a) (ii) - acquisition pursuant to inter se transfer of shares amongst qualifying persons, being persons named as promoters in the shareholding pattern filed by TC in terms of the SEBI listing regulations for not less than three years prior to the proposed acquisition.
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.	Volume weighted average market price for a period of 60 trading days for NSE – Rs. 5049.90 BSE – Rs. 5048.32
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not Applicable

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.	The acquisition price would not be higher by more than 25% of the price computed in point 6 above.			
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)	The acquirer and seller both will comply the 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.	All the conditions specified under regulation 10(1)(a) with respect to exemptions has 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
	Acquirers and PACs other than sellers	As per Annexure			
	Seller				

*A.Y. Sankholkar*  
**Archana Sankholkar**  
**(Promoter of Fine Organic Industries Limited)**  
**(Acquirer 1)**

*A.K. Patil*  
**Anjali Patil**  
**(Promoter of Fine Organic Industries Limited)**  
**(Acquirer 2)**

**ANNEXURE**

Sr. No.	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
<b>A.</b>	<b>Acquirers</b>				
1.	Archana Yatin Sankholkar	22,26,418	7.26	22,95,007	7.49
2.	Anjali Kunal Patil	22,26,417	7.26	22,95,006	7.49
<b>B.</b>	<b>PACs other than seller holding equity shares of TC</b>				
3.	Mukesh Maganlal Shah	19,18,314	6.26	19,18,314	6.26
4.	Jayen Ramesh Shah	48,14,166	15.70	48,14,166	15.70
5.	Tushar Ramesh Shah	49,86,509	16.26	49,86,509	16.26
6.	Bimal Mukesh Shah	32,00,766	10.44	32,00,766	10.44
7.	Neeta Jayen Shah	6,59,892	2.15	6,59,892	2.15
8.	Bina Tushar Shah	5,74,380	1.87	5,74,380	1.87
9.	Jayshree Mukesh Shah	5,68,572	1.85	5,68,572	1.85
10.	Akruti Bimal Shah	4,47,174	1.46	4,47,174	1.46
11.	R M Shah HUF (Karta - Jayen Ramesh Shah)	3,08,542	1.01	3,08,542	1.01
12.	Jayen R Shah HUF (Karta - Jayen Ramesh Shah)	3,06,978	1.00	3,06,978	1.00
13.	Shaili Nirav Doshi	1,22,898	0.40	1,22,898	0.40
14.	Esha Tushar Shah	2,09,832	0.68	2,09,832	0.68
15.	Rhea Tushar Shah	2,09,832	0.68	2,09,832	0.68
16.	Manali Vishal Doshi	76,614	0.25	76,614	0.25
17.	Maltiben Pradipkumar Shah	19	0.00	19	0.00
<b>C.</b>	<b>Seller</b>				
18.	P D KAMAT HUF (Karta - Archana Yatin Sankholkar)	1,37,178	0.45	0	0.00

Note: - Rounding off percentages may result in slight arithmetic differences.

Date: December 26, 2024

**To,**  
**BSE Limited**  
 Compliance Department  
 Phiroze Jeejeebhoy Towers,  
 Dalal Street, Fort  
 Mumbai – 400001.

**From,**  
**Archana Sankholkar**  
 C-7, Kapil Malhar Bungalows, Baner Road,  
 Pune, Maharashtra - 411045  
 Email: [archu\\_kamat@hotmail.com](mailto:archu_kamat@hotmail.com)

**To,**  
**National Stock Exchange of India Limited**  
 Plot No. C/1, "6" Block, Exchange Plaza  
 Bandra Kurla Complex, Bandra (East)  
 Mumbai - 400 051

**Anjali Patil**  
 12/A, Popco CHSL, Fisheries Univ Road,  
 Andheri (West), Mumbai - 400061  
 Email: [anjukamat14@gmail.com](mailto:anjukamat14@gmail.com)

**CC,**  
**To**  
**The Company Secretary / Compliance officer,**  
**Fine Organic Industries Limited,**  
**(Security Code: 541557, Symbol: FINEORG)**  
 Fine House, M. G. Road,  
 Ghatkopar (East), Mumbai – 400077

**Dear Sir(s) / Madam,**

**Sub: Disclosures under Regulation 10(6) – Report in respect of acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Pursuant to Regulation 10(6) of Securities Exchange Board of India (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 ('the Regulations'), please find enclosed herewith the necessary disclosure in the prescribed format for the acquisition of 1,37,178 equity shares of Fine Organic Industries Limited pursuant to Partition of P D Kamat HUF through an off-market transaction in compliance with Regulation 10(1)(a)(i) and 10(1)(a)(ii) of the SEBI (SAST) Regulations, 2011.

Sr. No.	Name of the person(s) - Transferee / Acquirer	No. of Shares acquired	Name of the person(s) - Transferor /Seller	Date of Transaction
1.	Acquirer 1: Archana Sankholkar	68,589	P D Kamat HUF (Karta – Archana Sankholkar)	December 24, 2024
2.	Acquirer 2: Anjali Patil	68,589		
	<b>TOTAL</b>	<b>1,37,178</b>		

Kindly take the information on record.

Thanking you,

*A.Y. Sankholkar*

**Archana Sankholkar**  
**(Promoter of Fine Organic Industries Limited)**  
**(Acquirer 1)**

*A.K. Patil*

**Anjali Patil**  
**(Promoter of Fine Organic Industries Limited)**  
**(Acquirer 2)**

Encl: As above

**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)	Fine Organic Industries Limited	
2.	Name of the acquirer(s)	1. Acquirer 1: Archana Sankholkar 2. Acquirer 2: Anjali Patil	
3.	Name of the stock exchange where shares of the TC are listed	BSE Limited and National Stock Exchange of India Limited	
4.	Details of the transaction including rationale, if any, for the transfer / acquisition of shares	1,37,178 equity shares acquired as below from P D Kamat HUF (Karta – Archana Sankholkar) pursuant to Partition of P D Kamat HUF: 1. 68,589 Equity shares by Archana Sankholkar 2. 68,589 Equity shares by Anjali Patil	
5.	Relevant regulation under which the acquirer is exempted from making open offer	Regulation 10(1)(a) (i) - acquisition pursuant to inter se transfer of shares amongst qualifying persons, being immediate relatives and Regulation 10(1)(a) (ii) - acquisition pursuant to inter se transfer of shares amongst qualifying persons, being persons named as promoters in the shareholding pattern filed by TC in terms of the SEBI listing regulations for not less than three years prior to the proposed acquisition.	
6.	Whether disclosure of the 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, the disclosure of the acquisition was required to be made under Regulation 10(5) and it was made to the stock exchanges on December 17, 2024 within the timeline specified under the regulations.	
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	P D Kamat HUF (Karta - Archana Sankholkar)	Yes
	b. Date of acquisition	December 24, 2024	Yes
	c. Number of shares / voting rights in respect of the acquisitions from each person mentioned in 7.(a) above	1,37,178	Yes
	d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	0.45%	Yes
	e. Price at which the shares are proposed to be acquired / actually acquired	NA	NA

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. Acquirer and PACs other than sellers	As per Annexure			
	b. Each Seller / Transferor				

*A.Y. Sankholkar*

**Archana Sankholkar**  
**(Promoter of Fine Organic Industries Limited)**  
**(Acquirer 1)**

*A. K. Patil*

**Anjali Patil**  
**(Promoter of Fine Organic Industries Limited)**  
**(Acquirer 2)**

**ANNEXURE**

Sr. No.	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
<b>A.</b>	<b>Acquirers</b>				
1.	Archana Yatin Sankholkar	22,26,418	7.26	22,95,007	7.49
2.	Anjali Kunal Patil	22,26,417	7.26	22,95,006	7.49
<b>B.</b>	<b>PACs other than seller holding equity shares of TC</b>				
3.	Mukesh Maganlal Shah	19,18,314	6.26	19,18,314	6.26
4.	Jayen Ramesh Shah	48,14,166	15.70	48,14,166	15.70
5.	Tushar Ramesh Shah	49,86,509	16.26	49,86,509	16.26
6.	Bimal Mukesh Shah	32,00,766	10.44	32,00,766	10.44
7.	Neeta Jayen Shah	6,59,892	2.15	6,59,892	2.15
8.	Bina Tushar Shah	5,74,380	1.87	5,74,380	1.87
9.	Jayshree Mukesh Shah	5,68,572	1.85	5,68,572	1.85
10.	Akruti Shah	447,174	1.46	447,174	1.46
11.	R M Shah HUF (Karta - Jayen Ramesh Shah)	3,08,542	1.01	3,08,542	1.01
12.	Jayen R Shah HUF (Karta - Jayen Ramesh Shah)	3,06,978	1.00	3,06,978	1.00
13.	Shaili Nirav Doshi	1,22,898	0.40	1,22,898	0.40
14.	Esha Tushar Shah	2,09,832	0.68	2,09,832	0.68
15.	Rhea Tushar Shah	2,09,832	0.68	2,09,832	0.68
16.	Manali Vishal Doshi	76,614	0.25	76,614	0.25
17.	Maltiben Pradipkumar Shah	19	0.00	19	0.00
<b>C.</b>	<b>Seller</b>				
18.	P D KAMAT HUF (Karta - Archana Yatin Sankholkar )	1,37,178	0.45	0	0.00

Note: - Rounding off percentages may result in slight arithmetic differences.



## ARCHANA SANKHOLKAR

C-7, Kapil Malhar Bungalows, Baner Road, Pune, Maharashtra – 411045  
Email: [archu\\_kamat@hotmail.com](mailto:archu_kamat@hotmail.com)

### Annexure III

Sr. No.	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
<b>A.</b>	<b>Acquirers</b>				
1.	Archana Yatin Sankholkar	22,26,418	7.26	22,95,007	7.49
2.	Anjali Kunal Patil	22,26,417	7.26	22,95,006	7.49
<b>B.</b>	<b>PACs other than seller holding equity shares of TC</b>				
3.	Mukesh Maganlal Shah	19,18,314	6.26	19,18,314	6.26
4.	Jayen Ramesh Shah	48,14,166	15.70	48,14,166	15.70
5.	Tushar Ramesh Shah	49,86,509	16.26	49,86,509	16.26
6.	Bimal Mukesh Shah	32,00,766	10.44	32,00,766	10.44
7.	Neeta Jayen Shah	6,59,892	2.15	6,59,892	2.15
8.	Bina Tushar Shah	5,74,380	1.87	5,74,380	1.87
9.	Jayshree Mukesh Shah	5,68,572	1.85	5,68,572	1.85
10.	Akruti Bimal Shah	4,47,174	1.46	4,47,174	1.46
11.	R M Shah HUF (Karta - Jayen Ramesh Shah)	3,08,542	1.01	3,08,542	1.01
12.	Jayen R Shah HUF (Karta - Jayen Ramesh Shah)	3,06,978	1.00	3,06,978	1.00
13.	Shaili Nirav Doshi	1,22,898	0.40	1,22,898	0.40
14.	Esha Tushar Shah	2,09,832	0.68	2,09,832	0.68
15.	Rhea Tushar Shah	2,09,832	0.68	2,09,832	0.68
16.	Manali Vishal Doshi	76,614	0.25	76,614	0.25
17.	Maltiben Pradipkumar Shah	19	0.00	19	0.00
<b>C.</b>	<b>Seller</b>				
18.	P D KAMAT HUF (Karta - Archana Yatin Sankholkar )	1,37,178	0.45	0	0.00

1. Name of Listed Entity: Fine Organic Industries Limited
2. Scrip Code/Name of Scrip/Class of Security: FINEORG
3. Share Holding Pattern Filed under: 31b
4. Share Holding Pattern as on: 30-Jun-2024

## ANNEXURE - IV

5. **Declaration:** The Listed entity is required to submit the following declaration to the extent of submission of information:-

S. No.	Particulars	Yes/No
1	Whether the Listed Entity has issued any partly paid up shares?	No
2	Whether the Listed Entity has issued any Convertible Securities?	No
3	Whether the Listed Entity has any shares against which depository receipts are issued?	No
4	Whether the Listed Entity has any shares in locked-in?	No
5	Whether any shares held by promoters are pledged or otherwise encumbered?	No
6	Whether the Listed Entity has issued any differential Voting Rights?	No
7	Whether the Listed Entity has issued any Warrants ?	No
8	Whether the listed entity has any significant beneficial owner?	Yes

Table I - Summary Statement holding of specified securities

Category (I)	Category of shareholder (II)	Nos. of shares held (III)	No. of fully paid up equity shares held (IV)	No. of Partly paid up equity shares held (V)	No. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	Number of Voting Rights held in each class of securities (IX)			No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Shareholding assuming full conversion of convertible securities (XI) As a % of diluted share capital (XI) = (VII)+(X) As a % of (A+B+C2)	Number of Locked in shares (XII) As a % of total Shares held (b)	Number of Shares pledged or otherwise encumbered (XIII) As a % of total Shares held (b)	Number of equity shares held in dematerialized form (XIV)	Sub-categorization of shares under
								Class eg: X	Class eg: y	Total						
A	Promoter & Promoter Group	19	22994501	0	0	22994501	75	22994501	0	22994501	75	0	0	22994501		
B	Public	131475	7665475	0	0	7665475	25	7665475	0	7665475	25	0	0	7665475		
C	Non Promoter-Non Public	0	0	0	0	0	0	0	0	0	0	0	0	0		
C1	Shares underlying DRs	0	0	0	0	0	0	0	0	0	0	0	0	0		
C2	Shares held by Employee Trusts	0	0	0	0	0	0	0	0	0	0	0	0	0		
	Total	131494	30659976	0	0	30659976	100	30659976	0	30659976	100	0	0	30659976		

Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

Category & Name of the Shareholders (I)	No. of shares held (III)	No. of fully paid up equity shares held (IV)	Partly paid up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding % calculated as per SCRR, 1957, As a % of (A+B+C2) (VIII)	Number of Voting Rights held (IX)			Shareholding % assuming full conversion of convertible securities (X) as a percentage of diluted share capital (XI) = $\frac{(X)}{(VI)+(X)}$ as a % of A+B+C2	Number of Locked in shares (XII)	Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)
							No of Voting Rights					As a % of total Shares held (b)	As a % of total shares held (b)	
							Class X	Class Y	Total					
Indian	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Individuals/Hindu undivided Family	18	22871603	0	0	22871603	74.6	22871603	74.6	0	0	0	0	0	22871603
P D KAMAT HUF (Karta - ARCHANA SANKHOLKAR)	1	137178	0	0	137178	0.45	137178	0.45	0	0	0	0	0	137178
R M Shah - HUF (Karta - JAYEN RAMESH SHAH)	1	308542	0	0	308542	1.01	308542	1.01	0	0	0	0	0	308542
Tushar R Shah HUF (Karta - TUSHAR RAMESH SHAH)	1	103218	0	0	103218	0.34	103218	0.34	0	0	0	0	0	103218
Jayen R Shah HUF (Karta - JAYEN RAMESH SHAH)	1	306978	0	0	306978	1	306978	1	0	0	0	0	0	306978
BINA TUSHAR SHAH	1	574380	0	0	574380	1.87	574380	1.87	0	0	0	0	0	574380
MUKESH MAGANLAL SHAH	1	1918314	0	0	1918314	6.26	1918314	6.26	0	0	0	0	0	1918314
JAYEN RAMESH SHAH	1	4814166	0	0	4814166	15.7	4814166	15.7	0	0	0	0	0	4814166
NEETA JAYEN SHAH	1	659892	0	0	659892	2.15	659892	2.15	0	0	0	0	0	659892
JAYSHREE MUKESH SHAH	1	568572	0	0	568572	1.85	568572	1.85	0	0	0	0	0	568572







Table III - Statement showing shareholding pattern of the Public shareholder

Category & Name of the Shareholder (i)	Nos. of shareholder (iii)	No. of fully paid up equity shares held (iv)	Partly paid-up equity shares held (v)	Nos. of shares underlying Depository Receipts (vi)	Total nos. shares held $\frac{VII}{IV+V+VI}$	Shareholding % calculated as per SCR, 1957 As a % of (A+B+C2) VIII	Number of Voting Rights held in each class of securities (ix)			No. of Shares Underlying Outstanding convertible securities (including Warrants) (x)	Total shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (xi)	Number of Locked in shares (xii)	Number of Shares pledged (xiii)	Number of equity shares held in dematerialized form (xiv)	Sub-categorization of shares
							No of Voting Rights								
							Class X	Class Y	Total						
1 Institutions (Domestic)	0	0	0	0	0	0	0	0	0	0	0	0	0	Sub-Categorization	
a Mutual Funds	14	3045091	0	0	3045091	9.93	3045091	0	9.93	0	0	0	3045091	Sub-Categorization	
NIPPON LIFE INDIA TRUSTEE LTD-A/C NIPPON INDIA SMA	1	759388	0	0	759388	2.48	759388	0	2.48	0	0	0	759388	Sub-Categorization	
SBI SMALL CAP FUND	1	703781	0	0	703781	2.3	703781	0	2.3	0	0	0	703781	Sub-Categorization	
AXIS MUTUAL FUND	1	1343149	0	0	1343149	4.38	1343149	0	4.38	0	0	0	1343149	Sub-Categorization	
TRUSTEE LIMITED A/C AXIS MUTUAL FUND	1	1343149	0	0	1343149	4.38	1343149	0	4.38	0	0	0	1343149	Sub-Categorization	
b Venture Capital Funds	0	0	0	0	0	0	0	0	0	0	0	0	0	Sub-Categorization	
c Alternate Investment Funds	5	27972	0	0	27972	0.09	27972	0	0.09	0	0	0	27972	Sub-Categorization	
d Banks	0	0	0	0	0	0	0	0	0	0	0	0	0	Sub-Categorization	
e Insurance Companies	8	338750	0	0	338750	1.1	338750	0	1.1	0	0	0	338750	Sub-Categorization	











Table V - Statement showing shareholding pattern of the Significant Beneficiary Owner (SBO)

Name	Nationality	Details of holding/ exercise of right of the SBO in the reporting company, whether direct or indirect*					Date of creation / acquisition of significant beneficial interest
		Shares	Voting rights	Rights on distributable dividend or any other distribution	Exercise of control	Exercise of significant influence	
1 JAYEN RAMESH SHAH	India	2.01	0	0			
A R M SHAH HUF	India	1.01			No	No	13-Aug-2010
B JAYEN R SHAH HUF	India	1			No	No	31-Dec-2007
2 TUSHAR RAMESH SHAH	India	0.34	0	0			
A TUSHAR R SHAH HUF	India	0.34			No	No	21-May-2008
3 ARCHANA SANKHOLKAR	India	0.45	0	0			
A P D KAMAT HUF	India	0.45			No	No	21-May-2008

Table VI - Statement showing foreign ownership limits

Sr. No.	Particular	Approved Limits (%)	Utilized Limit (%)
1	As on shareholding date	100.00	5.22
2	As on the end of previous 1st quarter	100.00	4.76
3	As on the end of previous 2nd quarter	100.00	3.87
4	As on the end of previous 3rd quarter	100.00	4.05
5	As on the end of previous 4th quarter	100.00	4.07

Table II- Unclaim Details

<b>Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.</b>	
No. of shareholders	No of share held

Table III- Unclaim Details

<b>Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.</b>	
No. of shareholders	No of share held

Table III- Person in Concert

<b>Details of the shareholders acting as persons in Concert including their Shareholding</b>		
Name of shareholder	Name of PAC	No. of share Holding %

1. Name of Listed Entity: Fine Organic Industries Limited
2. Scrip Code/Name of Scrip/Class of Security: FINEORG
3. Share Holding Pattern Filled under: 31b
4. Share Holding Pattern as on : September 30, 2024
5. **Declaration:** The Listed entity is required to submit the following declaration to the extent of submission of information:-

ANNEXURE - II

S. No.	Particulars	Yes/No
1	Whether the Listed Entity has issued any partly paid up shares?	No
2	Whether the Listed Entity has issued any Convertible Securities?	No
3	Whether the Listed Entity has any shares against which depository receipts are issued?	No
4	Whether the Listed Entity has any shares in locked-in?	No
5	Whether any shares held by promoters are pledge or otherwise encumbered?	No
6	Whether the Listed Entity has issued any differential Voting Rights?	No
7	Whether the Listed Entity has issued any Warrants ?	No
8	Whether the listed entity has any significant beneficial owner?	Yes

Table 1 - Summary Statement holding of specified securities

Category (I)	Category of shareholder (II)	Nos. of shares held (III)	No. of fully paid up equity shares held (IV)		No. of Partly paid-up equity shares held (V)		No. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)		Shareholding as % of total (VIII)	Number of securities held in each class of securities (IX)	No. of Shares Underlying (X)	Shareholding as % of full convertible securities (XI) = $\frac{(A+B+C)}{(A+B+C)}$	Number of Locked in shares (XII)	Number of Shares pledged or otherwise encumbered (XIII)	Number of equity shares held in dematerialized form (XIV)	Sub-category of shares
			As a % of (A+B+C)	As a % of (A+B+C)	Class eg: X	Class eg: Y		Total	As a % of (A+B+C)								
A	Promoter & Promoter Group	19	22994501	0	0	0	22994501	75	22994501	75	0	75	0	0	0	22994501	Shareholding of shares
B	Public	122463	7665475	0	0	0	7665475	25	7665475	25	0	25	0	0	0	7665475	Shareholding of shares
C	Non Promoter-Non Public	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Shareholding of shares
C1	Shares underlying DRS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Shareholding of shares
C2	Shares held by Employee Trusts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Shareholding of shares
	Total	122482	30659976	0	0	0	30659976	100	30659976	100	0	100	0	0	0	30659976	Shareholding of shares



Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

Category & of the Shareholders (I)	No. of shares older (III)	No. of fully paid up equity shares held (IV)	Part paid equi sta held (V)	Nos. of shares Depositor Receipts (VI)	Total nos. shares held (VII = IV+V+VI)	Shareholding % calculate as per SCRR, 1957 (VIII)	Number of each class of securities (IX)	No. of Voting Rights held in each class of securities (IX)	Total nos. of Voting rights (X)	No. of Shares, as assumed (XI)	Shareholding % as a percent of share capital (XII) = $\frac{A+B+C}{A+B+C} \times 100$	Number of Locked in shares (XIII)	Number of Shares pledged or otherwise encumbered (XIII)	Number of equity shares held in dematerial form (XIV)
Indian Individuals/Hindu undivided Family	0	0	0	0	0	0	0	0	0	0	0	0	0	0
P D KAMAT HUF (Karta - ARCHANA SANKHOLKAR)	1	137178	0	0	137178	0.45	0	137178	0.45	0	0.45	0	0	137178
R M Shah - HUF (Karta - JAYEN RAMESH SHAH)	1	308542	0	0	308542	1.01	0	308542	1.01	0	1.01	0	0	308542
Tushar R Shah HUF (Karta - TUSHAR RAMESH SHAH)	1	103218	0	0	103218	0.34	0	103218	0.34	0	0.34	0	0	103218
Jayen R Shah HUF (Karta - JAYEN RAMESH SHAH)	1	306978	0	0	306978	1	0	306978	1	0	1	0	0	306978
BINA TUSHAR SHAH	1	574380	0	0	574380	1.87	0	574380	1.87	0	1.87	0	0	574380
MUKESH	1	1918314	0	0	1918314	6.26	0	1918314	6.26	0	6.26	0	0	1918314









Table III - Statement showing shareholding pattern of the Public shareholder

Category & Name of the Shareholders (I)	Nos. of share holder (III)	No. of fully paid up equity shares held (IV)	Partly paid up equity shares held (V)	Nos. of Depository Receipts (VI)	Total nos. held VII = IV+V+VI	Shareholding % of As a % of	Number of Voting Rights held in each class of securities (IX)			Total as a % of Total Voting rights	No. of Shares Underlying Outstanding convertible securities (as a percentage of diluted share capital)	Total shareholding, as assumed on full conversion of convertible securities (as a percentage of diluted share capital)	Number of Locked shares (XII)	As a % of total shares (a)	Number of Shares pledged or otherwise encumbered (XIII)	As a % of total shares held (a)	Number of equity shares held in dematerialized form (XIV)	Sub-categorization of shares
							Class X	Class Y	Total									
1 Institutions (Domestic)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Sub-categorization of shares
a Mutual Funds	17	3111445	0	0	3111445	10.15	3111445	0	3111445	10.15	0	0	0	0	0	3111445	3111445	Sub-categorization of shares
NIPPON LIFE INDIA TRUSTEE LTD-A/C NIPPON INDIA SMA	1	761521	0	0	761521	2.48	761521	0	761521	2.48	0	0	0	0	0	761521	761521	Sub-categorization of shares
SBI NIFTY SMALLCAP 250 INDEX FUND	1	704454	0	0	704454	2.3	704454	0	704454	2.3	0	0	0	0	0	704454	704454	Sub-categorization of shares
AXIS MUTUAL FUND TRUSTEE LIMITED A/C AXIS MUTUAL FUND	1	1281605	0	0	1281605	4.18	1281605	0	1281605	4.18	0	0	0	0	0	1281605	1281605	Sub-categorization of shares
b Venture Capital Funds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Sub-categorization of shares
c Alternate Investment Funds	6	19841	0	0	19841	0.06	19841	0	19841	0.06	0	0	0	0	0	19841	19841	Sub-categorization of shares
d Banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Sub-categorization of shares
e Insurance Companies	8	414693	0	0	414693	1.35	414693	0	414693	1.35	0	0	0	0	0	414693	414693	Sub-categorization of shares
f Provident Funds/ Pension Funds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Sub-categorization of shares













Table V - Statement showing shareholding pattern of the Significant Beneficiary Owner (SBO)

	Name	Passport No. in case of a foreign national	Nationality	Details of holding/ exercise of right of the SBO in the reporting company, whether direct or indirect				Exercise of control	Exercise of significant influence	Date of creation / acquisition of significant beneficial interest
				Shares	Voting rights	Rights on dividend or any other distribution				
1	JAYEN RAMESH SHAH		India	2.01	0	0				
A	R M SHAH HUF		India	1.01			No	No	13-Aug-2010	
B	JAYEN R SHAH HUF		India	1			No	No	31-Dec-2007	
2	TUSHAR RAMESH SHAH		India	0.34	0	0				
A	TUSHAR R SHAH HUF		India	0.34			No	No	21-May-2008	
3	ARCHANA SANKHOLKAR		India	0.45	0	0				
A	P D KAMAT HUF		India	0.45			No	No	21-May-2008	

Table VI - Statement showing foreign ownership limits

<i>Sr. No.</i>	<i>Particular</i>	<i>Approved Limits (%)</i>	<i>Utilized Limit (%)</i>
1	As on shareholding date	100.00	5.16
2	As on the end of previous 1st quarter	100.00	5.22
3	As on the end of previous 2nd quarter	100.00	4.76
4	As on the end of previous 3rd quarter	100.00	3.87
5	As on the end of previous 4th quarter	100.00	4.05

Table II- Unclaim Details

<b>Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.</b>	
<b>No. of shareholders</b>	<b>No of share held</b>

Table III- Unclaim Details

<b>Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.</b>	
<b>No. of shareholders</b>	<b>No of share held</b>

Table III- Person in Concert

<b>Details of the shareholders acting as persons in Concert including their Shareholding</b>		
<b>Name of shareholder</b>	<b>Name of PAC</b>	<b>No. of share</b>
		<b>Holding %</b>