

December 08, 2023

To,
BSE Limited
P. J. Towers, Dalal Street,
Mumbai- 400 001.

Scrip Code: 532159

Dear Sir / Madam,

Sub.: Inter-se transfer of shares amongst the Promoters and Promoters Group

Ref.: Report under Regulation 10(7) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("SEBI SAST Regulations, 2011") pursuant to inter-se transfer of Equity Shares amongst promoters and promoters group

In compliance with the provisions of Regulation 10(7) of the SEBI SAST Regulations, 2011, for an inter se transfer amongst Promoters and Promoters Group under Regulation 10(1) (a) (ii) of the SEBI SAST Regulations, 2011, we have received report from the acquirers.

The respective intimation and report under Regulations 10(5) and 10(6), 29(1) and 29(2) of SAST Regulations, 2011 have already been filed with BSE Limited on October 27, 2023 and November 27, 2023 respectively.

Kindly take the same on the record of your esteemed exchange.

Thanking you,

Yours Faithfully,

For Trescon Limited

Mandar Chavan
Company Secretary

Trescon Limited

December 08, 2023

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

Scrip: 532159

Sub: Report under Regulation 10(7) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("SEBI SAST Regulations, 2011") pursuant to inter-se transfer of Equity Shares amongst promoters and promoters group

Dear Sir / Madam,

We, Sanjay N. Mehta, Ravilal K. Patel, Ratilal K. Patel, Harilal K. Patel and Hiralal K. Patel, being part of the Promoters and Promoters Group of Trescon Limited (hereinafter collectively referred as Acquirers), wish to inform you that we have acquired 30,18,646 equity shares of Trescon Limited (the "Company") from Vilas Pralhadrao Kharche, Promoter of the Company on November 23, 2023 through inter-se transfer of equity shares by way of off-market transaction. Since the acquisition of these equity shares are in compliance with and in terms of Regulation 10(1) (a) (ii) of SEBI (SAST) Regulations, 2011, we were exempt to make an open offer under Regulation 3 and Regulation 4 of SEBI (SAST) Regulation, 2011.

Pursuant to the Regulation 10(5) and 10(6) of SEBI (SAST) Regulations, 2011, the intimation under Regulation 10(5) and report under Regulation 10(6) have been submitted to BSE Limited for the abovementioned transaction on October 27, 2023 and November 27, 2023, respectively, within the prescribed timeline as stipulated under the above regulations.

Further, pursuant to the provisions of Regulation 10(7) of SEBI SAST Regulations, 2011, we are hereby attaching a detailed report together with relevant annexures with respect to acquisition of 30,18,646 equity shares of the Company through an inter-se transfer transaction between Promoters and Promoters Group in accordance with the Regulation 10(1) (a) (ii) of SEBI SAST Regulations, 2011 as mentioned below:

1. Report under Regulation 10(7) of SEBI SAST Regulations, 2011
2. Annexure-1- Copy of report under Regulation 10(5) of SEBI SAST Regulations, 2011
3. Annexure-2- Copy of report under Regulation 10(6) of SEBI SAST Regulations, 2011
4. Annexure-3- Shareholding of the acquirers and the seller in the Company during the 3 years prior to the proposed acquisition
5. Annexure-4- Copies of Shareholding Pattern viz as on March 31, 2023, March 31, 2022, March 31, 2021
6. Annexure 5-Copy of Disclosures under Regulation 29(2) of SEBI SAST Regulations, 2011.
7. Annexure 6-Copy of Disclosures under Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulation, 2015.

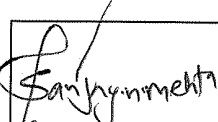
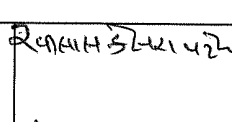
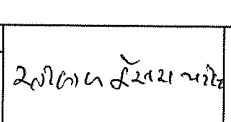
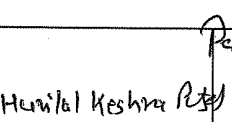
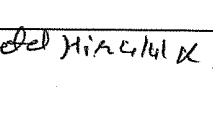
Receipt of application fee of 1,50,000 along with GST of 27,000 as required under Regulation 10(7) of SEBI SAST Regulations, 2011 in favour of Securities and Exchange Board of India, payable at Mumbai, is enclosed herewith.

The following are the details of the Application Fees: -

Particulars	Details
Instrument Type / UTR No. (Fees) + (GST)	Payment Mode: Net Banking Card Name: Bank of Baroda Retail Order Id: 2622220 Tracking Id: 113100683183 Date of payment: December 06, 2023
In Favor of	Securities and Exchange Board of India
Amount in Rupees	1,50,000/- (Rupees One Lakh Fifty Thousand Only)
GST	27,000/- (Rupees Twenty Seven Thousand Only)
Total	1,77,000/- (Rupees One Lakh Seventy Seven Thousand Only)

You are requested to acknowledge the receipt and take the details on your record.

Thanking You,
Yours Faithfully,

				
Sanjay Mehta [Promoter of Trescon Limited (Acquirer)]	N. Ravilal K. Patel [Promoter acting in Concern (PAC) of Trescon Limited (Acquirer)]	Ratilal K. Patel [Promoter acting in Concern (PAC) of Trescon Limited (Acquirer)]	Harilal K. Patel [Promoter acting in Concern (PAC) of Trescon Limited (Acquirer)]	Hiralal K. Patel [Promoter acting in Concern (PAC) of Trescon Limited (Acquirer)]

Encl: As above

Copy to:

BSE Limited (Scrip Code: 532159) Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001, Maharashtra, India. Email: corp.relations@bseindia.com	Trescon Limited 203-204, Second Floor, Orbit Plaza New Prabhadevi Road, Prabhadevi, Mumbai – 400025, Maharashtra, India. Email: cs@trescon.com
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Format under Regulation 10(7) – Report to SEBI in respect of any acquisition made in reliance upon exemption provided for regulation 10(1) (a)(ii) 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.}	The disclosure is pursuant to Inter-se transfer of equity shares amongst individual Promoters. As there are multiple acquirers, we are providing full contact details of one of the acquirers (the correspondent acquirer): Name: Sanjay N. Mehta Address: 4/Ravi Apartment,1st Floor, Gurukul Lane, Gurukul School, Ghatkopar (East) - 400077 Mobile no: 9322263074 E-mail: mehta.sanjay140@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 sender, if sender is not the acquirer	Not Applicable
2	Compliance of Regulation 10(7)	
a	Date of report	December 08, 2023
b	Whether report has been submitted to SEBI within 21 working days from the date of the acquisition	Yes, the report is being submitted to SEBI within 21 working days from date of acquisition viz., November 23,2023.
c	Whether the report is accompanied with fees as required under Regulation 10(7)	The application fees of 1, 50,000/- (Rupees One Lakh Fifty Thousand Only) is paid on December 06, 2023. Further, the amount payable as GST is 27,000/- (Rupees Twenty-Seven Thousand Only) is paid on December 06, 2023. The following are the details of the Application Fees: - Payment Mode: Net Banking Card Name: Bank of Baroda Retail Order Id: 2622220 Tracking Id: 113100683183 Date of payment: December 06, 2023
3	Compliance of Regulation 10(5)	
a	Whether the report has been filed with the Stock	Yes, the intimation under Regulation 10(5) of SEBI SAST Regulations, 2011, was submitted on October 27, 2023.

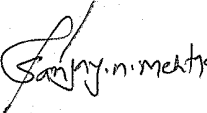
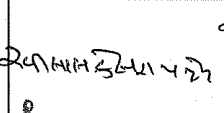
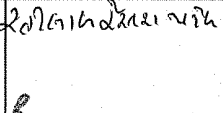
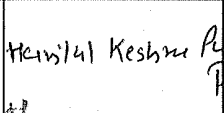
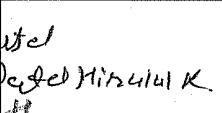
		Exchanges where the shares of the Company are listed atleast 4 working days before the date of the proposed acquisition.	Copy of intimation is attached as "Annexure I".			
	b	Date of Report	October 27, 2023			
4	Compliance of Regulation 10(6)					
	a	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed within 4 working days of the acquisition.	Yes, the disclosure as required under Regulation 10(6) of SEBI SAST Regulations, 2011 has been filed with the Stock Exchange on November 27, 2023 within 4 working days from the completion of acquisition. Copy of disclosure is attached as "Annexure II".			
	b	Date of Report	November 27, 2023			
5	Details of the target Company					
	a	Name & address of TC	Name: Trescon Limited CIN: L70100MH1995PLC322341 Address: 203-204, Second Floor, Orbit Plaza New Prabhadevi Road, Prabhadevi, Mumbai - 400025, Maharashtra, India.			
	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	November 23, 2023			
	b	Acquisition price per share (in Rs.)	14.00/- per equity share			
	c.	Regulation which would have been triggered off, had the report not been filed under Regulation 10(7). (Whether Regulation 3(1), 3(2), 4 or 5)	Regulation 3(2) of SEBI SAST Regulations, 2011			
	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(s) of the acquirer(s)				
		1. Sanjay Navin Mehta	27,29,448	3.77	30,83,998	4.26
		2. Ravilal Keshra Patel	5,11,622	0.71	12,96,493	1.79
		3. Ratilal Keshra Patel	5,12,027	0.71	16,31,502	2.25
		4. Harilal Keshara Patel	12,51,622	1.73	16,31,497	2.25
		5. Hiralal Keshara Patel	12,51,622	1.73	16,31,497	2.25
		PACs				

	Dinesh Ravilal Patel	41,34,615	5.70	41,34,615	5.70
	Kishor Ravilal Patel	17,13,920	2.36	17,13,920	2.36
	Ravilal Shivgan Patel HUF	43,83,333	6.05	43,83,333	6.05
	Kishor Ravilal Patel HUF	5,68,920	0.78	5,68,920	0.78
	Rajesh Ravilal Patel	15,07,838	2.08	15,07,838	2.08
	Krupa Manish Patel	5,00,000	0.69	5,00,000	0.69
	Nayanaben Ravilal Patel	28,19,000	3.89	28,19,000	3.89
	Ranjan Dinesh Patel	25,70,000	3.55	25,70,000	3.55
	Trupti Mitul Patel	28,19,000	3.89	28,19,000	3.89
	Viraj Dinesh Patel	5,00,000	0.69	5,00,000	0.69
	Nemish Sanjay Mehta	1,79,000	0.25	1,79,000	0.25
	Hemlata Manish Patel	28,19,000	3.89	28,19,000	3.89
	Rohit Vilas Kharche	0	0.00	0	0.00
	Total (A)	3,07,70,967	43.43	3,37,89,613	46.62
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(s) of the seller(s)				
	Vilas P. Kharche	30,18,646	4.16	0	0.00
	Total (B)	30,18,646	4.16	0	0.00
7	Information specific to the exemption category to which the instant acquisition belongs – Regulation 10(1)(a)(ii)				
a	Provide the names of the seller(s)	Vilas P. Kharche			
b	Specify the relationship between the acquirer(s) and the seller(s).	Acquirers and seller are part of Promoters and Promoters Group			
c	Shareholding of the acquirer and the seller/s in the TC during the three years prior to the proposed acquisition	March 31, 2023 (Year – 1)	March 31, 2022 (Year – 2)	March 31, 2021 (Year – 3)	
	Acquirer(s)	Shareholding of the acquirers and the seller in the TC during the 3 years prior to the proposed acquisition is enclosed as “Annexure III”.			
	Sanjay N. Mehta				
	Ravilal R. Patel				
	Ratilal R. Patel				
	Harilal R. Patel				
	Hiralal R. Patel				
Sellers(s)					
Vilas P. Kharche					
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	We hereby confirm that acquirers and seller have been named promoters in the shareholding pattern filed by the target company in terms of the Listing agreement and SEBI SAST Regulations, 2011.			

		of the listing agreement or the Takeover Regulations. Provide copies of such filings under the listing agreement or the Takeover Regulations.	Copy of the same is enclosed as "Annexure IV"
	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.	Not Applicable
	f.	If 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.	13.65 per equity share as determined on the basis of valuation report dated September 25, 2023 obtained from CS Devang Subodh Thakar an IBBI Registered Valuer -SFA (Reg. No.: IBBI/RV/03/2022/14881)
	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	Yes, we hereby declare that acquisition price for the inter-se transfer is not higher or more than 25% of the price computed in point (f) above.
	h	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed	October 27, 2023
	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.	Yes, Acquirers as well as Seller have complied with the provisions of Chapter V of the SEBI SAST Regulations, 2011. Copies of the Disclosure filed with BSE is enclosed as Annexure -V
	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.	We Sanjay N. Mehta, Ravilal K. Patel, Ratilal K. Patel, Harilal K. Patel and Hiralal K. Patel, Acquirers hereby declare that all the conditions specified under regulation 10(1) (a) (ii) with respect to exemptions have been duly complied with.

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

Thanking You,
Yours Faithfully

				
Sanjay N. Mehta [Promoter of Trescon Limited (Acquirer)]	Ravilal K. Patel [Promoter acting in Concern (PAC) of Trescon Limited (Acquirer)]	Ratilal K. Patel [Promoter acting in Concern (PAC) of Trescon Limited (Acquirer)]	Harilal K. Patel [Promoter acting in Concern (PAC) of Trescon Limited (Acquirer)]	Hiralal K. Patel [Promoter acting in Concern (PAC) of Trescon Limited (Acquirer)]

Date: December 08, 2023
Place: Mumbai