

SHREE PUSHKAR CHEMICALS & FERTILISERS LTD.

CIN: L24100MH1993PLC071376

(A Government of India Recognised Export House)

An ISO 9001:2008 & 14001:2004 Certified Company

Office No. 301/302, 3rd Floor, Atlanta Center, Near Udyog Bhavan,
Sonawala Road, Goregaon (East), Mumbai - 400063, India.

Tel.: + 91 22 4270 2525 • Fax: + 91 22 2850 4242

email: info@shreepushkar.com. Website: www.shreepushkar.com

Date: 6th January, 2020.

To,

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block G,
Bandra Kurla Complex, Bandra (East),
Mumbai – 400051.

Bombay Stock Exchange Limited

P. J. Tower, Dalal Street,
Mumbai – 400 001.

Dear Sir's

Subject: *Filing of Disclosures under SEBI (Substantial Acquisition of Shares and takeovers) Regulations, 2011 and SEBI (Prohibition of Insider Trading) Regulations, 2015.*

Ref: *Shree Pushkar Chemicals & Fertilisers Ltd
Symbol Code: SHREEPUSHK; Scrip Code: 539334*

With reference to above captioned subject matter, we would like to inform you that we have received disclosures pertaining to inter-se transfer of 30,00,000 equity shares transacted as an off-market transaction between Mr. Punit Makharia and Mr. Gautam Makharia, the promoters of the Company as per their gift deed.

The necessary disclosures and declarations as required under SEBI (SAST) Regulations, 2011 and SEBI (PIT) Regulations, 2015 are attached herewith for reference purpose.

Kindly take the above information on your record and obliged.

Yours Sincerely

For Shree Pushkar Chemicals & Fertilisers Limited

Satish Chavan
Company Secretary
M.No.: A40764

Place: Mumbai.



Unit I : B -102/103, MIDC Lote Parshuram, Taluka Khed, Dist. Ratnagiri, Maharashtra, India.

Tel: + 91 2356 272718, 272625 • Fax: + 91 2356 272625

Unit II : D-25, MIDC Lote Parshuram, Taluka Khed, Dist. Ratnagiri, Maharashtra, India.

Tel: + 91 2356 272255 • Fax: + 91 2356 273255

www.shreepushkar.com

Date: 27th December, 2019.

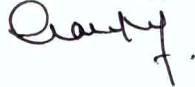
To,
The Compliance Officer
Shree Pushkar Chemicals & Fertilisers Limited
301/302, 3rd Floor, Atlanta Center,
Near Udyog Bhavan, Sonawala Road,
Goregaon (East), Mumbai – 400063.

Dear Sir,

I, Gautam Makharia, hereby undertake and confirm as under with respect to proposed inter-se transfer of shares in terms of Regulation 10(1)(a)(i) & 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 and SEBI (Prohibition of Insider Trading) Regulations, 2015 and subsequent amendments thereto that:

1. I, propose to acquire/purchase 30,00,000 Equity Shares of Shree Pushkar Chemicals & Fertilisers Limited from Mr. Punit Makharia, Managing Director (promoter & brother) as inter-se transfer of shares between Promoters and Promoters Group as per the Gift deed, through off market transaction.
2. The transferor and transferee have/will complied/Comply with the applicable provisions of Chapter II and Chapter V of SEBI (SAST) Regulations, 2011.
3. All the applicable conditions are mentioned in Regulation 10(1)(a) of SEBI (SAST) Regulations, 2011 with respect to exemption have been duly complied with.
4. Inter se transfer of shares may be exercise/transact during the closure of trading window pursuant to amendment made on 25.07.2019 under Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with regulation 4(1)(i); with respect to exemption have duly complied with.
5. Have not breached the Regulation 3 of SEBI (Prohibition of Insider Trading) Regulations, 2015.
6. Other compliance(s)/requirements of submission of documents (reports), if any required under any of the SEBI regulation, will be complied in due time frame and transaction.

Thanking You,
Yours Sincerely,



Gautam Makharia
Acquirer promoter

CC:

National Stock Exchange Limited
Exchange plaza, 5th Floor, Plot No. C/1,
G Block, BKC, Bandra East
Mumbai – 400 051.

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

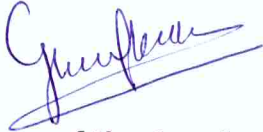
Format for Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Part-A- Details of the Acquisition

1. Name of the Target Company (TC)	Shree Pushkar Chemicals & Fertilisers Ltd		
2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Acquirer & Promoter- Mr. Gautam Gopikishan Makharia and PAC (List Is Enclosed Herewith)		
3. Whether the acquirer belongs to Promoter/Promoter group	Yes		
4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed	The Bombay Stock Exchange Limited The National Stock Exchange Limited		
5. Details of the acquisition as follows	Number	% w.r.t Total share/voting capital wherever Applicable (*)	% of Total diluted shares/voting capital of TC (**)
Before the acquisition under consideration, holding of acquirer along with PACs of:			
a) Shares carrying voting rights	57,80,504	18.81	18.81
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 TC (specify holding in each category)	-	-	-
(e) Total (a+b+c+d)	57,80,504	18.81	18.81
Details of acquisition:			
(a) Shares carrying voting rights acquired/sold	3000000	9.76	9.76
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	-	-	-
d) Shares in the nature of			

encumbrance (pledge/ lien / non-disposal undertaking / others)	-	-	-
e) Total (a+b+c+/-d)	3000000	9.76	9.76
After the acquisition, holding of acquirer along with PACs of:			
a) Shares carrying voting rights	87,80,504	28.57	28.57
b) VRs otherwise than by equity 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) after acquisition	-	-	-
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
e) Total (a+b+c+d)	87,80,504	28.57	28.57
Mode of acquisition (e.g. open market /public issue/rights issue/preferential allotment/inter-se transfer / encumbrance, etc.)	Inter-se transfer and off-market transaction		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	NA		
Date of acquisition of/ date of receipt of intimation of allotment of shares / VR/ warrants/ convertible securities /any other instrument that entitles the acquirer to receive shares in the TC.	04.01.2020		
Equity share capital / total voting capital of the TC before the said acquisition	3,07,24,310 Equity Shares [Paid up Equity Shares Capital Rs. 30,72,43,100]		

Equity share capital/ total voting capital of the TC after the said acquisition	3,07,24,310 Equity Shares [Paid up Equity Shares Capital Rs. 30,72,43,100]
Total diluted share/voting capital of the TC after the said acquisition	3,07,24,310 Equity Shares [Paid up Equity Shares Capital Rs. 30,72,43,100]



Signature of the Acquirer / Authorised Signatory

Place: Mumbai
Date: 07.01.2020

Note:

(*) 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.

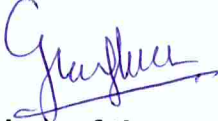
(**) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

(***) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.

Note: This disclosure is in respect of inter-se transaction made of 30,00,000 Equity Shares amongst the promoter only (as well relative), so that Form 29(1) being submitted for said acquisition as required under SEBI (SAST) Reg., 2011. No any consideration has been paid/ received to any promoter. There will be no change in the aggregate shareholding of Promoters Group after the inter-se transaction.

List of promoters and Persons Acting in Concert (PAC)

Sr. No.	Name of the Shareholder	Holding prior to inter-se transaction	Holding % prior to inter se transaction	Inter-se Transaction	holding after inter- se transaction	Holding % after inter-se transaction
1	Mr. Punit Gopikishan Makharia	12571759	40.91	(3000000)	95,71,759	31.15
2	Mr. Gautam Gopikishan Makharia	57,80,504	18.81	3000000	87,80,504	28.57
3	Mrs. .Bhanu Gopi Makharia	475040	1.55	-	475040	1.55
4	Mrs. Ranjana Punit Makharia	414647	1.35	-	414647	1.35
5	Mr. Gopi Krishan Makharia	377986	1.23		377986	1.23
6	Mrs. Aradhana Makharia	359629	1.17		359629	1.17
7.	Mr. Raghav Makharia	335	0	0	335	0



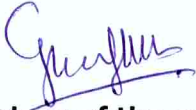
Signature of the acquirer

Place: Mumbai
Date: 07.01.2020

Part-B***

Name of the Target Company: Shree Pushkar Chemicals & Fertilisers Limited

Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Whether the acquirer belongs to Promoter/ Promoter group	PAN of the acquirer and/ or PACs
Mr. Punit Gopikishan Makharia	Yes	AACPM4481B
Mr. Gautam Gopikishan Makharia	Yes	AACPM4482C
Mrs. .Bhanu Gopi Makharia	Yes	AABPM1093N
Mrs. Ranjana Punit Makharia	Yes	AABPM1097J
Mr. Gopi Krishan Makharia	Yes	ABHPM8102F
Mrs. Aradhana Makharia	Yes	AQJPM5849E
Mr. Raghav Makharia	Yes	CNYPM7468M



Signature of the acquirer / Authorised Signatory

Place: Mumbai
Date: 07.01.2020

Note:

(*) 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.

(***) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.

Note: This disclosure is in respect of inter-se transaction made of 30,00,000 Equity Shares amongst the promoter only (as well relative), so that Form 29(1) being submitted for said acquisition as required under SEBI (SAST) Reg., 2011. No any consideration has been paid/ received to any promoter. There will be no change in the aggregate shareholding of Promoters Group after the inter-se transaction.

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

1. Name of the Target Company (TC)	Shree Pushkar Chemicals & Fertilisers Ltd		
2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Acquirer & Promoter- Mr. Gautam Gopikishan Makharia and PAC (List Is Enclosed Herewith)		
3. Whether the acquirer belongs to Promoter/Promoter group	Yes		
4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed	The Bombay Stock Exchange Limited The National Stock Exchange Limited		
5. Details of the Acquisition/ disposal as follows	Number	% w.r.t Total share/voting capital wherever Applicable (*)	% of Total diluted shares/voting capital of TC (**)
Before the acquisition under consideration, holding of :			
a) Shares carrying voting rights	57,80,504	18.81	18.81
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)	57,80,504	18.81	18.81
Details of acquisition/sale			
(a) Shares carrying voting rights acquired/sold	3000000	9.76	9.76
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	-	-	-

e) Total (a+b+c+/-d)	3000000	9.76	9.76
After the acquisition/sale, holding of:			
a) Shares carrying voting rights	87,80,504	28.57	28.57
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)	87,80,504	28.57	28.57
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	off market and inter-se transfer		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	04.01.2020		
Equity share capital / total voting capital of the TC before the said acquisition / sale	3,07,24,310 Equity Shares [Paid up Equity Shares Capital Rs. 30,72,43,100]		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	3,07,24,310 Equity Shares [Paid up Equity Shares Capital Rs. 30,72,43,100]		
Total diluted share/voting capital of the TC after the said acquisition	3,07,24,310 Equity Shares [Paid up Equity Shares Capital Rs. 30,72,43,100]		

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(**) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.



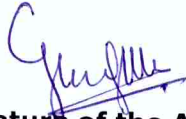
Signature of the acquirer / ~~seller~~ / Authorised Signatory

Place: Mumbai
Date: 07.01.2020

Note: This disclosure is in respect of inter-se transaction made of 30,00,000 Equity Shares amongst the promoter only (as well relative), so that Form 29(2) being submitted for said acquisition as required under SEBI (SAST) Reg., 2011. No any consideration has been paid/ received to any promoter. There will be no change in the aggregate shareholding of Promoters Group after the inter-se transaction.

List of promoters and Person Acting in Concern (PAC)

Sr. No.	Name of the Shareholder	Holding prior to inter-se transaction	Holding % prior to inter se transaction	Inter-se Transaction	holding after inter- se transaction	Holding % after inter-se transaction
1	Mr. Punit Gopikishan Makharia	12571759	40.91	(3000000)	95,71,759	31.15
2	Mr. Gautam Gopikishan Makharia	57,80,504	18.81	3000000	87,80,504	28.57
3	Mrs. .Bhanu Gopi Makharia	475040	1.55	-	475040	1.55
4	Mrs. Ranjana Punit Makharia	414647	1.35	-	414647	1.35
5	Mr. Gopi Krishan Makharia	377986	1.23	-	377986	1.23
6	Mrs. Aradhana Makharia	359629	1.17	-	359629	1.17
7.	Mr. Raghav Makharia	335	0	0	335	0



Signature of the Acquirer

Place: Mumbai
Date: 07.01.2020

Date: 27th December, 2019.

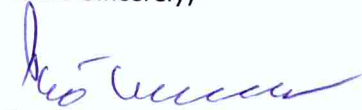
To,
The Compliance Officer,
Shree Pushkar Chemicals & Fertilisers Limited
301/302, 3rd Floor, Atlanta Center,
Near Udyog Bhavan, Sonawala Road,
Goregaon (East), Mumbai – 400063.

Dear Sir,

I, Punit Makharia, hereby undertake and confirm as under with respect to proposed inter-se transfer of shares in terms of Regulation 10(1)(a)(i) & 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 and SEBI (Prohibition of Insider Trading) Regulations, 2015 and subsequent amendments thereto that:

1. I, propose to transfer/sale 30,00,000 Equity Shares of Shree Pushkar Chemicals & Fertilisers Limited to Mr. Gautam Makharia, Joint Managing Director (promoter & brother) as inter-se transfer of shares between Promoters and Promoters Group as per the Gift deed, through off market transaction.
2. The transferor and transferee have/will complied/comply with the applicable provisions of Chapter II and Chapter V of SEBI (SAST) Regulations, 2011.
3. All the applicable conditions are mentioned in Regulation 10(1)(a) of SEBI (SAST) Regulations, 2011 with respect to exemption have been duly complied with.
4. Inter se transfer of shares may be exercise/transact during the closure of trading window pursuant to amendment made on 25.07.2019 under Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with 4 (1) (i); with respect to exemption have duly complied with.
5. Have not breached the Regulation 3 of SEBI (Prohibition of Insider Trading) Regulations, 2015.
6. Other compliance(s)/requirements of submission of documents (reports), if any required under any of the SEBI regulation, will be complied in due time frame and transaction.

Thanking You,
Yours Sincerely,



Punit Makharia
Transferor promoter

CC:

National Stock Exchange Limited
Exchange plaza, 5th Floor, Plot No.C/1,
G Block, BKC, Bandra East
Mumbai – 400 051.

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

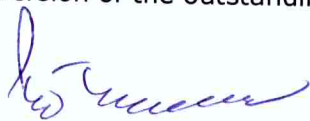
Format for Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1. Name of the Target Company (TC)	Shree Pushkar Chemicals & Fertilisers Ltd		
2. Name(s) of the Seller and Persons Acting in Concert (PAC) with the Transferor	Mr. Punit Gopikishan Makharia and PAC (List Is Enclosed Herewith)		
3. Whether the Seller belongs to Promoter/Promoter group	Yes		
4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed	The Bombay Stock Exchange Limited The National Stock Exchange Limited		
5. Details of the Acquisition/ disposal as follows	Number	% w.r.t Total share/voting capital wherever Applicable (*)	% of Total diluted shares/voting capital of TC (**)
Before the acquisition under consideration, holding of :			
a) Shares carrying voting rights	12571759	40.91	40.91
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)	12571759	40.91	40.91
Details of acquisition/sale			
(a) Shares carrying voting rights acquired/sold	(3000000)	(9.76)	(9.76)
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	-	-	-

e) Total (a+b+c+/-d)	(3000000)	(9.76)	(9.76)
After the acquisition/sale, holding of:			
a) Shares carrying voting rights	95,71,759	31.15	31.15
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)	95,71,759	31.15	31.15
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Off Market and Inter-se Transfer		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	04.01.2020		
Equity share capital / total voting capital of the TC before the said acquisition / sale	3,07,24,310 Equity Shares [Paid up Equity Shares Capital Rs. 30,72,43,100]		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	3,07,24,310 Equity Shares [Paid up Equity Shares Capital Rs. 30,72,43,100]		
Total diluted share/voting capital of the TC after the said Sale	3,07,24,310 Equity Shares [Paid up Equity Shares Capital Rs. 30,72,43,100]		

(*) 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 Seller / Authorised Signatory

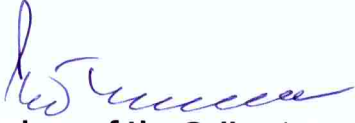
Place: Mumbai

Date: 07.01.2020

Note: This disclosure is in respect of inter-se transaction made of 30,00,000 Equity Shares amongst the promoter only (as well relative), so that Form 29(2) being submitted for said sale as required under SEBI (SAST) Reg., 2011. No any consideration has been paid/ received to any promoter. There will be no change in the aggregate shareholding of Promoters Group after the inter-se transaction.

List of promoters and Person Acting in Concern (PAC)

Sr. No.	Name of the Shareholder	Holding prior to inter-se transaction	Holding % prior to inter se transaction	Inter-se Transaction	holding after inter- se transaction	Holding % after inter-se transaction
1	Mr. Punit Gopikishan Makharia	12571759	40.91	(3000000)	95,71,759	31.15
2	Mr. Gautam Gopikishan Makharia	57,80,504	18.81	3000000	87,80,504	28.57
3	Mrs. .Bhanu Gopi Makharia	475040	1.55	-	475040	1.55
4	Mrs. Ranjana Punit Makharia	414647	1.35	-	414647	1.35
5	Mr. Gopi Krishan Makharia	377986	1.23	-	377986	1.23
6	Mrs. Aradhana Makharia	359629	1.17	-	359629	1.17
7.	Mr. Raghav Makharia	335	0	0	335	0



Signature of the Seller / Authorised Signatory

Place: Mumbai

Date: 07.01.2020

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2)]

Name of the company: **Shree Pushkar Chemicals & Fertilisers Limited**
ISIN of the company: **INE712K01011**

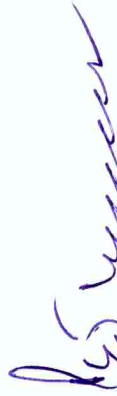
Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

1	2	3	4		5	6	7	8	9	10		11	12	13	14
			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. and % of shareholding				
1	PUNIT GOPIKISHAN MAKHARIA, PAN- AACPM4481B Din: 01430764 Add: C WING -903/904, LAKSHCHANDI HEIGHTS, GOKULDHAM GOREGAON EAST, MUMBAI 400063 MH IN Phone: 9820214054	2	Managing Director/Promoter	Equity Shares	12571759 And 40.91%	30,00,000	Rs. 3,00,00,000/- nominal Value	Sell	Equity Shares	95,71,759 and 31.15%	04.01.2020 (Sale of Shares)	04.01.2020 (Sale of Shares)	06.01.2020	Off Market transaction / Inter-se transfer of shares between promoters.	

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21
-	-	-	-	-	-	-



Signature:

Punit Makharja

Designation: Managing Director

DIN: 01430764

Date: 06.01.2019

Place: Mumbai

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2)]

Name of the company: **Shree Pushkar Chemicals & Fertilisers Limited**
ISIN of the company: **INE712K01011**

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).

1	2	3	Securities held prior to acquisition/disposal		6	7	8	9	Securities held post acquisition/disposal		10	11	12	13	14
			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. and % of shareholding					
GAUTAM GOPIKISHAN MAKHARIA, PAN- AACPM4482C Din: 01354843 Add: C-603, LAKSHCHANDI HEIGHTS, GOKULDHAM GOREGAON EAST, MUMBAI 400063 MH IN, Phone: 8879310401	Joint Managing Director/ Promoter	Equity Shares	57,80,504 And 18.81%	Equity Shares	30,00,000	Rs. 3,00,00,000/- nominal Value	Buy	Equity Shares	87,80,504 and 28.57%	04.01.2020 (Acquisition of shares)	04.01.2020 (Acquisition of shares)	06.01.2020	Off Market Inter-se transfer of shares between Promoters.		

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21
-	-	-	-	-	-	-



Signature:
Gautam Makharia
Designation: Joint Managing Director
DIN: 01354843

Date: 06.01.2019
Place: Mumbai