

# BHAVESH TRUST

12A, Green Avenue, Sector-D, Pocket- III, Vasant Kunj, New Delhi – 110070.

Ref: BT/Sectt./April-20/

1<sup>st</sup> April, 2020

The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, 5th Floor, Plot No. C-1  
Block – G, Bandra-Kurla Complex  
Bandra (East),  
Mumbai –400 051.  
E: mail: - takeover@nse.co.in  
(SCRIP CODE: NSE: JINDALPOLY)

The Deptt of Corporate Services  
The BSE Ltd  
25, PJ Towers, Dalal Street  
Mumbai – 400001.

E: mail: - corp.relations@bseindia.com  
corp.compliance@bseindia.com  
(SCRIP CODE: BSE: 500227)

Company Secretary  
Jindal Poly Films Ltd.  
19th K.M. Hapur Bulandshahr Road,  
P.O. Gulaothi, Distt. - Bulandshahr,  
U.P. – 203408.  
E: mail: - cs\_jpoly@jindalgroup.com

Re: **DISCLOSURE UNDER REGULATION 29(1) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011.**

Dear Sirs,

Pursuant to Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, we Bhavesh Trust hereby make disclosure as enclosed in respect of purchase of 22,50,000 equity shares from Jindal Photo Investments Limited. The abovesaid transaction is interse transfer of shares from one promoter to another promoter of Jindal Poly Films Limited.

This is for your information and records.

Yours truly,  
For **Bhavesh Trust**



(Trustee)  
Encl: as above

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

**Part-A- Details of the Acquisition**

Name of the Target Company (TC)	Jindal Poly Films Ltd. (SCRIP CODE: NSE: JINDALPOLY BSE: 500227)		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	<b>Acquirer:</b> Bhavesh Trust  <b>Persons Acting in Concert(PAC)</b> I. Consolidated Photo & Finvest Ltd. II. Consolidated Finvest and Holdings Ltd. III. Jindal Photo Investments Ltd. IV. Rishi Trading Company Ltd. V. Soyuz Trading Company Ltd. VI. Aakriti Trust VII. SSJ Trust VIII. Ms. Aakriti Ankit Agarwal IX. Mr. Bhavesh Jindal X. Mr. Shyam Sunder Jindal		
Whether the acquirer belongs to Promoter/Promoter group	Promoter Group		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	i) National Stock Exchange of India Limited (NSE). ii) BSE Limited (BSE).		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
<b>Before the acquisition under consideration, holding of acquirer along with PAC :</b>  a) Shares carrying voting rights (i) Consolidated Photo & Finvest Ltd. (ii) Consolidated Finvest and Holdings Ltd. (iii) Jindal Photo Investments Ltd. (iv) Rishi Trading Company Ltd. (v) Soyuz Trading Company Ltd. (vi) Bhavesh Trust (vii) Aakriti Trust (viii) SSJ Trust (ix) Ms. Aakriti Ankit Agarwal (x) Mr. Bhavesh Jindal (xi) Mr. Shyam Sunder Jindal	8,23,289 15,64,072 1,14,95,410 52,24,016 1,22,05,344 1,19,000 4,55,525 7,52,433 1,000 1,000 0	1.89 3.57 26.25 11.93 27.88 0.27 1.04 1.72 0.00 0.00 0.00	1.89 3.57 26.25 11.93 27.88 0.27 1.04 1.72 0.00 0.00 0.00

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b) Shares in the nature of encumbrance (pledge/lien/ non-disposal undertaking/ others)	NIL	N.A	N.A
c) Voting rights (VR) otherwise than by shares	NIL	N.A	N.A
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)	NIL	N.A	N.A
<b>Total (a+b+c+d)</b>	<b>3,26,41,089</b>	<b>74.55</b>	<b>74.55</b>
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/sold: <b>Acquisition</b>	22,50,000	5.14	5.14
b) VRs acquired /sold otherwise than by shares	NIL	N.A	N.A
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	NIL	N.A	N.A
d) Shares encumbered / invoked/released by the acquirer	NIL	N.A	N.A
<b>Total (a+b+c+/-d)</b>	<b>22,50,000</b>	<b>5.14</b>	<b>5.14</b>

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<p><b>After the acquisition/sale, holding of acquirer along with PAC:</b></p> <p>a) Shares carrying voting rights</p> <p>(i) Consolidated Photo &amp; Finvest Ltd.</p> <p>(ii) Consolidated Finvest and Holdings Ltd.</p> <p>(iii) Jindal Photo Investments Ltd.</p> <p>(iv) Rishi Trading Company Ltd.</p> <p>(v) Soyuz Trading Company Ltd.</p> <p>(vi) Bhavesh Trust</p> <p>(vii) Aakriti Trust</p> <p>(viii) SSJ Trust</p> <p>(ix) Ms. Aakriti Ankit Agarwal</p> <p>(x) Mr. Bhavesh Jindal</p> <p>(xi) Mr. Shyam Sunder Jindal</p> <p>b) Shares encumbered with the acquirer</p> <p>c) VRs otherwise than by shares</p> <p>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</p> <p style="text-align: right;"><b>Total (a+b+c+d)</b></p>	<p>8,23,289</p> <p>15,64,072</p> <p>92,45,410</p> <p>52,24,016</p> <p>1,22,05,344</p> <p>23,69,000</p> <p>4,55,525</p> <p>7,52,433</p> <p>1,000</p> <p>1,000</p> <p>0</p> <p><b>3,26,41,089</b></p>	<p>1.89</p> <p>3.57</p> <p>21.11</p> <p>11.93</p> <p>27.88</p> <p>5.41</p> <p>1.04</p> <p>1.72</p> <p>0.00</p> <p>0.00</p> <p>0.00</p> <p><b>74.55</b></p>	<p>1.89</p> <p>3.57</p> <p>21.11</p> <p>11.93</p> <p>27.88</p> <p>5.41</p> <p>1.04</p> <p>1.72</p> <p>0.00</p> <p>0.00</p> <p>0.00</p> <p><b>74.55</b></p>
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Off market interse transfer between promoter group		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	N.A		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	31 <sup>st</sup> March, 2020		
Equity share capital / total voting capital of the TC before the said acquisition / sale*	Rs. 43,78,64,130 /- (4,37,86,413 Equity Shares of Rs. 10 each).		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	Rs. 43,78,64,130 /- (4,37,86,413 Equity Shares of Rs. 10 each).		
Total diluted share/voting capital of the TC after the said acquisition**	Rs. 43,78,64,130 /- (4,37,86,413 Equity Shares of Rs. 10 each).		

For Bhavesh Trust



+ Trustee

Date: 1.04.2020

Place: New Delhi

Note: (\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under the Listing Regulations. (\*\*) 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.

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For Bhavesh Trust



Trustee

Date: 1.04.2020

Place: New Delhi

**Note:**

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

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P.O. Gulaothi, Distt. - Bulandshahr,  
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E: mail: - cs\_jpoly@jindalgroup.com

Re: **DISCLOSURE UNDER REGULATION 29(2) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011.**

Dear Sirs,

Pursuant to Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, we Bhavesh Trust hereby make disclosure as enclosed in respect of purchase of 22,50,000 equity shares from Jindal Photo Investments Limited. The abovesaid transaction is interse transfer of shares from one promoter to another promoter of Jindal Poly Films Limited.

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Trustee

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

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Whether the acquirer belongs to Promoter/Promoter group	Promoter Group		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	ii) National Stock Exchange of India Limited (NSE). ii) BSE Limited (BSE).		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
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<b>Total (a+b+c+d)</b>	<b>3,26,41,089</b>	<b>74.55</b>	<b>74.55</b>
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<b>Total (a+b+c+/-d)</b>	<b>22,50,000</b>	<b>5.14</b>	<b>5.14</b>



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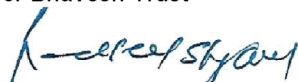
12A, Green Avenue, Sector-D, Pocket- III, Vasant Kunj, New Delhi – 110070.

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e) Shares carrying voting rights			
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(ii) Consolidated Finvest and Holdings Ltd.	15,64,072	3.57	3.57
(iii) Jindal Photo Investments Ltd.	92,45,410	21.11	21.11
(iv) Rishi Trading Company Ltd.	52,24,016	11.93	11.93
(v) Soyuz Trading Company Ltd.	1,22,05,344	27.88	27.88
(vi) Bhavesh Trust	23,69,000	5.41	5.41
(vii) Aakriti Trust	4,55,525	1.04	1.04
(viii) SSJ Trust	7,52,433	1.72	1.72
(ix) Ms. Aakriti Ankit Agarwal	1,000	0.00	0.00
(x) Mr. Bhavesh Jindal	1,000	0.00	0.00
(xi) Mr. Shyam Sunder Jindal	0	0.00	0.00
 f) Shares encumbered with the acquirer g) VRs otherwise than by shares h) 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			
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For Bhavesh Trust



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Date: 1.04.2020  
Place: New Delhi