

FIM Ltd.

15 December 2020

To,

RattanIndia Power Limited A-49, Ground Floor, Road No. 4, Mahipalpur, New Delhi – 110 037	BSE Limited Pheroze Jeejeebhoy Towers Dalal Street, Fort Mumbai – 400 001	National Stock Exchange of India Limited 'Exchange Plaza' Bandra Kurla Complex, Bandra (East) Mumbai – 400 051
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Re: Disclosure pursuant to Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("SAST Regulations")

Dear Sir / Madam,

Please find attached the disclosure in accordance with Regulation 29(2) of the SAST Regulations in the prescribed format.

We request you to kindly take the same on record. Thanking you.

Yours truly,

For and on behalf of FIM Ltd.

By: 
Name: Michael B. Fisch
Designation: Director

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

Name of the Target Company (TC)	RattanIndia Power Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	FIM Ltd.		
Whether the acquirer belongs to Promoter/Promoter group	No		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	National Stock Exchange of India Limited BSE Limited		
<u>Details of the acquisition / disposal as follows</u>	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the acquisition under consideration, holding of:			
a) Shares carrying voting rights [#]	279,103,307	5.65%	4.86% [@]
b) Shares in the nature of encumbrance (pledge/lien/ non-disposal undertaking/ others)	Nil	Nil	Nil
c) Voting rights (VR) otherwise than by shares	Nil	Nil	Nil
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	Nil	Nil
e) Total (a+b+c+d)	279,103,307	5.65%	4.86% [@]
Details of acquisition/sale:			
a) Shares carrying voting rights acquired/sold	145,824,928	2.95%	2.54% [@]
b) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
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	Nil	Nil

d) Shares encumbered / invoked/released by the acquirer	Nil	Nil	Nil
e) Total (a+b+c+/-d)	145,824,928	2.95%	2.54% [@]
After the acquisition/sale, holding of:			
a) Shares carrying voting rights	133,278,379	2.7%	2.32% [@]
b) Shares encumbered with the acquirer	Nil	Nil	Nil
c) VRs otherwise than by shares	Nil	Nil	Nil
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	Nil	Nil	Nil
e) Total (a+b+c+d)	133,278,379	2.7%	2.32% [@]
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	FIM Ltd. sold an aggregate of 145,824,928 equity shares over several sale trades starting from 10 December 2020 until 14 December 2020. Upon completion of the sale trade on 14 December 2020, FIM Ltd.'s shareholding in RattanIndia Power Limited reduced to 2.7% (and 2.32% on a fully diluted basis) lesser than its shareholding in its last disclosure made to the stock exchanges and RattanIndia Power Limited on 11 December 2020 (a copy of which is attached as <u>Annexure 1</u>). Accordingly, this disclosure is being made.		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	A series of sale trades starting from 10 December 2020 until 14 December 2020, the details of which are attached as <u>Annexure 2</u> .		
Equity share capital / total voting capital of the TC before the said acquisition / sale	5.65%		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	2.7%		
Total diluted share/voting capital of the TC after the said acquisition / sale	2.32% [@]		

#As of the date of the last disclosure to the stock exchanges and RattanIndia Power Limited on 11 December 2020.

@This is the total shareholding as a percentage assuming full conversion of convertible securities (as a percentage of diluted share capital) as provided in the statement showing shareholding pattern of public shareholders in RattanIndia Power Limited for the quarter ending September 2020, assuming that there have been no changes in the shareholding of RattanIndia Power Limited from the September 2020 quarter ending shareholding pattern available on the stock exchanges' websites until the date of this disclosure so as to impact the fully diluted shareholding percentage of FIM Ltd.

(*) 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.

For and on behalf of FIM Ltd.

By: 

Name: Michael B. Fisch
Designation: Director
Authorised Signatory

Place: San Francisco, CA, U.S.A.

Date: 15 December 2020

ANNEXURE 1

FIM Ltd.

11 December 2020

To,

RattanIndia Power Limited A-49, Ground Floor, Road No. 4, Mahipalpur, New Delhi – 110 037	BSE Limited Pheroze Jeejeebhoy Towers Dalal Street, Fort Mumbai – 400 001	National Stock Exchange of India Limited 'Exchange Plaza' Bandra Kurla Complex, Bandra (East) Mumbai – 400 051
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Dear Sir / Madam,

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Name: Michael B. Fisch
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Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	RattanIndia Power Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	FIM Ltd.		
Whether the acquirer belongs to Promoter/Promoter group	No		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	National Stock Exchange of India Limited BSE Limited		
<u>Details of the acquisition / disposal as follows</u>	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the acquisition under consideration, holding of:			
a) Shares carrying voting rights [#]	393,273,458	10.4631%	6.84% ^{&}
b) Shares in the nature of encumbrance (pledge/lien/ non-disposal undertaking/ others)	Nil	Nil	Nil
c) Voting rights (VR) otherwise than by shares	Nil	Nil	Nil
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	Nil	Nil
e) Total (a+b+c+d)	393,273,458	10.4631%	6.84% ^{&}
Details of acquisition/sale:			
a) Shares carrying voting rights acquired/sold	114,170,151	2.31%	1.99% [@]
b) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
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	Nil	Nil

d) Shares encumbered / invoked/released by the acquirer	Nil	Nil	Nil
e) Total (a+b+c+/-d)	114,170,151	2.31%	1.99% [@]
After the acquisition/sale, holding of:			
a) Shares carrying voting rights	279,103,307	5.65%	4.86% [@]
b) Shares encumbered with the acquirer	Nil	Nil	Nil
c) VRs otherwise than by shares	Nil	Nil	Nil
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	Nil	Nil	Nil
e) Total (a+b+c+d)	279,103,307	5.65%	4.86% [@]
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	FIM Ltd. sold an aggregate of 114,170,151 equity shares over several sale trades starting from 10 September 2020 until 9 December 2020. Upon completion of the sale trade on 9 December 2020, FIM Ltd.'s shareholding in RattanIndia Power Limited reduced to 2.31% (and 1.99% on a fully diluted basis) lesser than its shareholding in its last disclosure made to the stock exchanges and RattanIndia Power Limited on 10 August 2020 (a copy of which is attached as <u>Annexure 1</u>). Accordingly, this disclosure is being made.		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	A series of sale trades starting from 10 September 2020 until 9 December 2020, the details of which are attached as <u>Annexure 2</u> .		
Equity share capital / total voting capital of the TC before the said acquisition / sale	7.96%		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	5.65%		
Total diluted share/voting capital of the TC after the said acquisition / sale	4.86% [@]		

#As of the date of the last disclosure to the stock exchanges and RattanIndia Power Limited on 10 August 2020.

& This is the total shareholding as a percentage assuming full conversion of convertible securities (as a percentage of diluted share capital) as provided in the statement showing shareholding pattern of public shareholders in in RattanIndia Power Limited for the quarter ending June 2020

@This is the total shareholding as a percentage assuming full conversion of convertible securities (as a percentage of diluted share capital) as provided in the statement showing shareholding pattern of public shareholders in in RattanIndia Power Limited for the quarter ending September 2020, assuming that there have been no changes in the shareholding of RattanIndia Power Limited from the September 2020 quarter ending shareholding pattern available on the stock exchanges' websites until the date of this disclosure so as to impact the fully diluted shareholding percentage of FIM Ltd.

(*) 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.

For and on behalf of FIM Ltd.

By: 

Name: Michael B. Fisch
Designation: Director
Authorised Signatory

Place: San Francisco, CA, U.S.A.

Date: 11 December 2020

ANNEXURE 2

Trade Date	Total Sales Quantity
12/10/2020	3,035,001
12/10/2020	700,133
12/10/2020	2,926,608
12/10/2020	700,133
12/10/2020	53,856
12/10/2020	4,010,539
12/10/2020	996,343
12/10/2020	541,964
12/10/2020	161,569
12/10/2020	54,196
12/10/2020	26,928
12/10/2020	270,982
12/10/2020	53,856
12/10/2020	2,692,820
12/11/2020	8,342,783
12/11/2020	1,924,565
12/11/2020	8,044,826
12/11/2020	1,924,565
12/11/2020	148,043
12/11/2020	11,024,394
12/11/2020	2,738,804
12/11/2020	1,489,782
12/11/2020	444,130
12/11/2020	148,978
12/11/2020	74,022
12/11/2020	744,891
12/11/2020	148,043
12/11/2020	7,402,174
12/14/2020	6,860,001
12/14/2020	7,865,000
12/14/2020	6,615,000
12/14/2020	7,865,000
12/14/2020	605,000
12/14/2020	9,065,000
12/14/2020	11,192,500
12/14/2020	1,224,999
12/14/2020	1,815,000
12/14/2020	122,500
12/14/2020	302,500
12/14/2020	612,500
12/14/2020	605,000
12/14/2020	30,250,000
	145,824,928