

13<sup>th</sup> October, 2020

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

Dear Sir/Madam,

**Subject: Submission of Disclosure of Intimation under Regulation 10(7) for Inter-se transfer amongst immediate relatives under Regulation 10(1)(a)(i) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

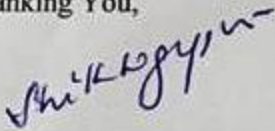
Please find enclosed intimation under Regulation 10(7) in respect of acquisition of shares of M/s. Kamanwala Housing Construction Limited made under Regulation 10(1)(a)(i) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Please find below details of payment of Rs. 1,50,000/- paid to your good office pursuant to acquisition under the said regulations:

<b>Date of Payment</b>	<b>12.10.2020 vide NEFT Ref. No. – ORBCH20286084634</b>
<b>Amount</b>	<b>1,50,000/-</b>
<b>Purpose</b>	<b>Pursuant to exemption of open offer claimed under Regulation 10(7), against acquisition of shares from immediate relatives.</b>

Kindly take this on your record and acknowledge the receipt of the same.

Thanking You,



**SHIKHA VIKAS GUPTA**  
**ACQUIRER**  
Encl: As stated

**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) 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.}
b.	Whether sender is the acquirer (Y/N)
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)
d.	Name, address, Tel no. and e-mail of the sender, if sender is not the acquirer
<b>2 Compliance of Regulation 10(7)</b>	
a.	Date of report
b.	Whether report has been submitted to SEBI within 21 working days from the date of the acquisition
c.	Whether the report is accompanied with fees as required under Regulation 10(7)
<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, atleast 4 working days before the date of the proposed acquisition
b.	Date of Report
<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
b.	Date of Report
<b>5 Details of the Target Company (TC)</b>	
a.	Name & address of TC

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'

	b.	Name of the Stock Exchange(s) where the shares of the TC are listed	Bombay Stock Exchange			
<b>6 Details of the acquisition</b>						
	a.	Date of acquisition	25/09/2020			
	b.	Acquisition price per share (in Rs.)	Not Applicable as it is inter-se transfer between immediate relative and promoters by way of Gift without consideration.			
	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)	Regulation 3(2)			
	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
		- Shikha Vikas Gupta - Acquirer	0	0.00%	16,38,278	11.62%
		- PAC (**) (Composite Shareholding of promoters excluding that of acquirer – Refer Annexure-1)	59,64,793	42.32%	43,26,515	30.70%
	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
		- Pushpa Jain – Seller (**)	6,37,800	4.53%	0	0.00%
		- Atul Jain – Seller (**)	14,81,364	10.51%	4,80,886	3.41%
<b>7 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)	Atul Jain & Pushpa Jain			
	b.	Specify the relationship between the acquirer(s) and the seller(s).	Atul Jain & Pushpa Jain are Parents of Mrs. Shikha Vikas Gupta.			
	c.	Confirm whether the acquirer(s) and the seller(s) are 'immediate relatives' as defined in the Regulation 2(1).	Yes acquirer and seller(s) are immediate relatives as defined in the Regulation 2(1).			
	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.	NA			

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'

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.	NA
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.	NA
g.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	19/09/2020
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 along with the copies of the same.	Yes Copies of such filings under Chapter V of the Takeover Regulations for acquirer and seller are attached herewith as Annexure-2.
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.	I hereby declare that all the conditions specified under regulation 10(1)(a)(i) with respect to exemptions has been duly complied with.

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

*Shikha Gupta*

**SHIKHA VIKAS GUPTA**  
**ACQUIRER**

Date: 13.10.2020

Place: Delhi

**NOTE:**

- (\*) In case, percentage of shareholding to the total capital is different from percentage of voting rights, indicate percentage of shareholding and voting rights separately.
- (\*\*) Shareholding of each entity shall be shown separately and then collectively in a group.

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'

## Annexure -1: Shareholding of Acquirer and PAC

Shareholding Details	Before the proposed transaction		Details of Acquisition		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	No. of shares / voting rights	% w.r.t total share capital of TC
<b>Name of the Acquirer:</b>						
Mrs. Shikha Vikas Gupta	-	-	16,38,278	11.62%	16,38,278	11.62%
<b>Name of the PAC:</b>						
M/s. Jaipal Jain HUF	3,800	0.03%	-	-	3,800	0.03%
M/s. Atul Jain HUF	30,400	0.22%	-	-	30,400	0.22%
Mrs. Rashmi Jain	38,000	0.27%	-	-	38,000	0.27%
Mrs. Neena Jain	57,500	0.41%	-	-	57,500	0.41%
Mrs. Sudha Gupta	1,24,776	0.89%	-	-	1,24,776	0.89%
Mr. Vaibhav Jain	3,00,000	2.13%	-	-	3,00,000	2.13%
Mrs. Shobha Jain	5,30,112	3.76%	-	-	5,30,112	3.76%
Mrs. Pushpa Jain	6,37,800	4.53%	(6,37,800)	(4.53%)	-	-
Mr. Tarun Jain	8,41,489	5.97%	-	-	8,41,489	5.97%
Mr. Amit Jaipal Jain	9,25,752	6.57%	-	-	9,25,752	6.57%
M/s. Attar Construction Company Private Limited	9,93,800	7.05%			9,93,800	7.05%
Mr. Atul Jain	14,81,364	10.51%	(10,00,478)	(7.10%)	4,80,886	3.41%
<b>TOTAL</b>	<b>59,64,793</b>	<b>42.32%</b>	<b>-</b>	<b>-</b>	<b>59,64,793</b>	<b>42.32%</b>

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

**Date: 26/09/2020**

To,  
**Corporate Relation Department**  
BSE Limited  
P.J. Tower, Dalal Street  
Mumbai - 400 001.  
**Scrip Code: 511131**

Dear Sir / Ma'am,

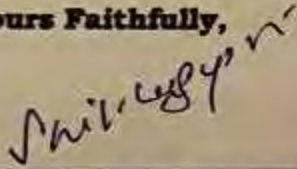
**Sub: Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

In accordance with the provisions of Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I wish to inform you that I have acquired 10,00,478 equity shares and 6,37,800 equity shares of Kamanwala Housing Construction Limited by way of Inter-se (Off market) transfer through Gift from Mr. Atul Jain & Mrs. Pushpa Jain, Promoters of the Company respectively, on 25<sup>th</sup> September, 2020, being 11.62% of total paid up equity share capital.

Accordingly, I enclose herewith the requisite disclosure duly signed.

**Thanking You,**

**Yours Faithfully,**



**Shikha Vikas Gupta**  
**Acquirer**

Address: 108E, Central Avenue, Sainik farms, New Delhi - 61.

Encl: As Above

CC:

To,  
**Company Secretary**  
**Kamanwala Housing Construction Limited**  
406, New Udyog Mandir - 2, Mogul Lane,  
Mahim (W), Mumbai, Maharashtra - 400016

**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)	Kamanwala Housing Construction Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	<b>Acquirer:</b> Shikha Vikas Gupta  <b>PAC:</b> 1. Jaipal Jain HUF 2. Rashmi Jain 3. Atul Jain 4. Neena Jain 5. Sudha Gupta 6. Vaibhav Jain 7. Shobha Jain 8. Pushpa Jain 9. Tarun Jain 10. Amit Jaipal Jain 11. Atul Jain HUF 12. Attar Construction Company Private Limited		
Whether the acquirer belongs to Promoter/Promoter group	Shikha Vikas Gupta is Daughter of Mr. Atul Jain & Mrs. Pushpa Jain, Promoters of the Company.		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Ltd.		
Details of the acquisition is as follows	<b>Number</b>	<b>% w.r.t. total share/voting capital wherever applicable (*)</b>	<b>% w.r.t. total diluted share/voting capital of the TC (**)</b>
<b>Before the acquisition under consideration, holding of acquirer along with PACs of:</b> a) Shares carrying voting rights <ul style="list-style-type: none"> <li>- Shikha Vikas Gupta (Acquirer)</li> <li>- PAC (Composite Shareholding of promoters excluding that of Acquirer - Refer Annexure)</li> </ul> b) Shares in the nature of encumbrance (pledge/ lien/non-	59,64,793	42.32%	42.32%

*Shikha Gupta*

disposal undertaking/ others)			
c) Voting rights (VR) otherwise than by equity 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)			
<b>e) Total (a+b+c+d)</b>	<b>59,64,793</b>	<b>42.32%</b>	<b>42.32%</b>
<b>Details of acquisition</b>			
a) Shares carrying voting rights acquired	16,38,278	11.62%	11.62%
b) VRs acquired 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) acquired			
d) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)			
<b>e) Total (a+b+c+d)</b>	<b>16,38,278</b>	<b>11.62%</b>	<b>11.62%</b>
<b>After the acquisition, holding of acquirer along with PACs of:</b>			
a) Shares carrying voting rights			
- Shikha Vikas Gupta (Acquirer)	16,38,278	11.62%	11.62%
- PAC (Composite Shareholding of promoters excluding that of acquirer - Refer Annexure)	43,26,515	30.70%	30.70%
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)			
<b>e) Total (a+b+c+d)</b>	<b>59,64,793</b>	<b>42.32%</b>	<b>42.32%</b>
Mode of acquisition (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	Acquisition of shares through off market inter-se transfer by way of Gift.		
Salient features of the securities acquired including time till redemption,	NA		

*Shikha Gupta*



ratio at which it can be converted into equity shares, etc.	
Date of acquisition of or 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.	25/09/2020
Equity share capital / total voting capital of the TC before the said acquisition	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.
Equity share capital/ total voting capital of the TC after the said acquisition	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.
Total diluted share/voting capital of the TC after the said acquisition	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.

*Shikha Gupta*

**SHIKHA VIKAS GUPTA**

**Signature of the Acquirer / Authorized Signatory**

Place: Delhi

Date: 26/09/2020

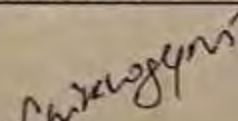
**Annexure: Shareholding of Acquirer and PAC**

Shareholding Details	Before the proposed transaction		Details of Acquisition		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	No. of shares / voting rights	% w.r.t total share capital of TC
<b>Name of the Acquirer:</b>						
<b>Mrs. Shikha Vikas Gupta</b>	-	-	16,38,278	11.62%	16,38,278	11.62%
<b>Name of the PAC:</b>						
M/s. Jaipal Jain HUF	3,800	0.03%	-	-	3,800	0.03%
M/s. Atul Jain HUF	30,400	0.22%	-	-	30,400	0.22%
Mrs. Rashmi Jain	38,000	0.27%	-	-	38,000	0.27%
Mrs. Neena Jain	57,500	0.41%	-	-	57,500	0.41%
Mrs. Sudha Gupta	1,24,776	0.89%	-	-	1,24,776	0.89%
Mr. Vaibhav Jain	3,00,000	2.13%	-	-	3,00,000	2.13%
Mrs. Shobha Jain	5,30,112	3.76%	-	-	5,30,112	3.76%
Mrs. Pushpa Jain	6,37,800	4.53%	(6,37,800)	(4.53%)	-	-
Mr. Tarun Jain	8,41,489	5.97%	-	-	8,41,489	5.97%
Mr. Amit Jaipal Jain	9,25,752	6.57%	-	-	9,25,752	6.57%
M/s. Attar Construction Company Private Limited	9,93,800	7.05%			9,93,800	7.05%
Mr. Atul Jain	14,81,364	10.51%	(10,00,478)	(7.10%)	4,80,886	3.41%
<b>TOTAL</b>	<b>59,64,793</b>	<b>42.32%</b>	-	-	<b>59,64,793</b>	<b>42.32%</b>

*Atul Jain*

**Part-B\*\*\*****Name of the Target Company: KAMANWALA HOUSING CONSTRUCTION LIMITED**

Name(s) of the Acquirer and Person Acting in Concert (PAC) with the acquirer	Whether the Acquirer belongs to Promoter/ Promoter group	PAN of the acquirer and / or PACs
SHIKHA VIKAS GUPTA	IMMEDIATE RELATIVE OF PROMOTER	AFLPJ9434M
JAIPAL JAIN HUF	PROMOTER	AAAHJ1194C
ATUL JAIN	PROMOTER	AADPJ0686L
RASHMI JAIN	PROMOTER	AEYPJ5824P
NEENA JAIN	PROMOTER	ADAPJ3987A
SUDHA GUPTA	PROMOTER	AADPG5038M
VAIBHAV JAIN	PROMOTER	AGGPJ1826M
SHOBHA JAIN	PROMOTER	AADPJ7486J
PUSHPA JAIN	PROMOTER	ABDPJ1082D
TARUN JAIN	PROMOTER	AAAPJ7554Q
AMIT JAIPAL JAIN	PROMOTER	AAAPJ7555R
ATUL JAIN HUF	PROMOTER	AAEHA1832J
ATTAR CONSTRUCTION CO. PVT. LTD.	PROMOTER	AAACA0971H


**SHIKHA VIKAS GUPTA****Signature of the Acquirer / Authorized Signatory**

Place: Delhi

Date: 26/09/2020

**Note:**

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Regulation 31 of SEBI (LODR) Regulations, 2015.

(\*\*) 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.

**Date: 26/09/2020**

To,  
**Corporate Relation Department**  
BSE Limited  
P.J. Tower, Dalal Street  
Mumbai - 400 001.  
**Scrip Code: 511131**

Dear Sir / Ma'am,

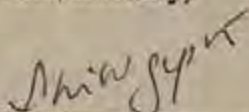
**Sub: Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

In accordance with the provisions of Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I wish to inform you that I have acquired 10,00,478 equity shares and 6,37,800 equity shares of Kamanwala Housing Construction Limited by way of Inter-se (Off market) transfer through Gift from Mr. Atul Jain & Mrs. Pushpa Jain, Promoters of the Company respectively, on 25<sup>th</sup> September, 2020, being 11.62% of total paid up equity share capital.

Accordingly, I enclose herewith the requisite disclosure duly signed.

**Thanking You,**

**Yours Faithfully,**



**Shikha Vikas Gupta**  
**Acquirer**

Address: 108E, Central Avenue, Sainik farms, New Delhi - 61.

Encl: As Above

CC:

To,

**Company Secretary**

**Kamanwala Housing Construction Limited**

406, New Udyog Mandir - 2, Mogul Lane,

Mahim (W), Mumbai, Maharashtra - 400016

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

Name of the Target Company (TC)	Kamanwala Housing Construction Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	<b>Acquirer:</b> Shikha Vikas Gupta  <b>PAC:</b> 1. Jaipal Jain HUF 2. Rashmi Jain 3. Atul Jain 4. Neena Jain 5. Sudha Gupta 6. Vaibhav Jain 7. Shobha Jain 8. Pushpa Jain 9. Tarun Jain 10. Amit Jaipal Jain 11. Atul Jain HUF 12. Attar Construction Company Private Limited		
Whether the acquirer belongs to Promoter/Promoter group	Shikha Vikas Gupta is Daughter of Mr. Atul Jain & Mrs. Pushpa Jain, Promoters of the Company.		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Ltd.		
Details of the acquisition / disposal as follows	<b>Number</b>	<b>% w.r.t. total share/voting capital wherever applicable (*)</b>	<b>% w.r.t. total diluted share/voting capital of the TC (**)</b>
<b>Before the acquisition / disposal under consideration, holding of:</b> a) Shares carrying voting rights <ul style="list-style-type: none"> <li>- Shikha Vikas Gupta (Acquirer)</li> <li>- PAC (Composite Shareholding of promoters excluding that of Acquirer - Refer Annexure)</li> </ul> b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others) c) Voting rights (VR) otherwise than by equity shares d) Warrants/convertible securities/any other instrument that entitles the	-  59,64,793	-  42.32%	-  42.32%

*Shikha Vikas Gupta*

acquirer to receive shares carrying voting rights in the TC (specify holding in each category)			
<b>a) Total (a+b+c+d)</b>	<b>59,64,793</b>	<b>42.32%</b>	<b>42.32%</b>
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired / sold	16,38,278	11.62%	11.62%
b) VRs acquired / sold 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) acquired/sold			
d) Shares encumbered / invoked / released by the acquirer			
<b>e) Total (a+b+c+d)</b>	<b>16,38,278</b>	<b>11.62%</b>	<b>11.62%</b>
<b>After the acquisition / sale, holding of:</b>			
a) Shares carrying voting rights			
- Shikha Vikas Gupta (Acquirer)	16,38,278	11.62%	11.62%
- PAC (Composite Shareholding of promoters excluding that of acquirer - Refer Annexure)	43,26,515	30.70%	30.70%
b) Shares encumbered with the acquirer			
c) VRs otherwise than by equity 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			
<b>e) Total (a+b+c+d)</b>	<b>59,64,793</b>	<b>42.32%</b>	<b>42.32%</b>
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	Acquisition of shares through off market inter-se transfer by way of Gift		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	25/09/2020		
Equity share capital / total voting capital of the TC before the said acquisition/sale	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.		

*Vishayam*

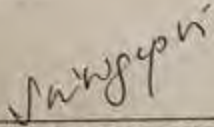
Total diluted share/voting capital of the TC after the said acquisition/sale

Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.

**Note:**

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Regulation 31 of SEBI (LODR) Regulations, 2015.

(\*\*) 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.



**SHIKHA VIKAS GUPTA**

**Signature of the Acquirer / Seller/ Authorized Signatory**

Place: Delhi

Date: 26/09/2020

**Annexure: Shareholding of Acquirer and PAC**

Shareholding Details	Before the proposed transaction		Details of Acquisition		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	No. of shares / voting rights	% w.r.t total share capital of TC
<b>Name of the Acquirer:</b>						
<b>Mrs. Shikha Vikas Gupta</b>	-	-	16,38,278	11.62%	16,38,278	11.62%
<b>Name of the PAC:</b>						
M/s. Jaipal Jain HUF	3,800	0.03%	-	-	3,800	0.03%
M/s. Atul Jain HUF	30,400	0.22%	-	-	30,400	0.22%
Mrs. Rashmi Jain	38,000	0.27%	-	-	38,000	0.27%
Mrs. Neena Jain	57,500	0.41%	-	-	57,500	0.41%
Mrs. Sudha Gupta	1,24,776	0.89%	-	-	1,24,776	0.89%
Mr. Vaibhav Jain	3,00,000	2.13%	-	-	3,00,000	2.13%
Mrs. Shobha Jain	5,30,112	3.76%	-	-	5,30,112	3.76%
Mrs. Pushpa Jain	6,37,800	4.53%	(6,37,800)	(4.53%)	-	-
Mr. Tarun Jain	8,41,489	5.97%	-	-	8,41,489	5.97%
Mr. Amit Jaipal Jain	9,25,752	6.57%	-	-	9,25,752	6.57%
M/s. Attar Construction Company Private Limited	9,93,800	7.05%			9,93,800	7.05%
Mr. Atul Jain	14,81,364	10.51%	(10,00,478)	(7.10%)	4,80,886	3.41%
<b>TOTAL</b>	<b>59,64,793</b>	<b>42.32%</b>	-	-	<b>59,64,793</b>	<b>42.32%</b>

*Vikas Gupta*



**Date: 26/09/2020**

To,  
**Corporate Relation Department**  
BSE Limited  
P.J. Tower, Dalal Street  
Mumbai – 400 001.  
**Scrip Code: 511131**

Dear Sir / Ma'am,

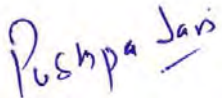
**Sub: Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

In accordance with the provisions of Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I wish to inform you that I have sold 6,37,800 equity shares of Kamanwala Housing Construction Limited, being 4.53% of total paid up equity share capital, by way of Inter-se (Off market) transfer by way of Gift to Mrs. Shikha Vikas Gupta, being immediate relative on 25<sup>th</sup> September, 2020.

Accordingly, I enclose herewith the requisite disclosure duly signed.

**Thanking You,**

**Yours Faithfully,**



---

**Pushpa Jain**  
**Seller (Donor)**

Encl: As Above

CC:

**To,**  
**Company Secretary**  
**Kamanwala Housing Construction Limited**  
406, New Udyog Mandir – 2, Mogul Lane,  
Mahim (W), Mumbai, Maharashtra - 400016

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

Name of the Target Company (TC)	Kamanwala Housing Construction Limited		
Name(s) of the <del>acquirer</del> /seller and Persons Acting in Concert (PAC) with the <del>acquirer</del> / seller	<p><b>Seller:</b></p> <p>Pushpa Jain</p> <p><b>PAC:</b></p> <ol style="list-style-type: none"> <li>1. Jaipal Jain HUF</li> <li>2. Rashmi Jain</li> <li>3. Shikha Vikas Gupta</li> <li>4. Neena Jain</li> <li>5. Sudha Gupta</li> <li>6. Vaibhav Jain</li> <li>7. Shobha Jain</li> <li>8. Atul Jain</li> <li>9. Tarun Jain</li> <li>10. Amit Jaipal Jain</li> <li>11. Atul Jain HUF</li> <li>12. Attar Construction Company Private Limited</li> </ol>		
Whether the <del>acquirer</del> /seller belongs to Promoter/Promoter group	Promoter		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Ltd.		
Details of the acquisition / disposal as follows	<b>Number</b>	<b>% w.r.t. total share/voting capital wherever applicable (*)</b>	<b>% w.r.t. total diluted share/voting capital of the TC (**)</b>
<p><b>Before the acquisition/disposal under consideration, holding of:</b></p> <p>a) Shares carrying voting rights</p> <ul style="list-style-type: none"> <li>- Pushpa Jain (Seller)</li> <li>- PAC (Composite Shareholding of promoters excluding that of Seller – Refer Annexure)</li> </ul> <p>b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)</p> <p>c) Voting rights (VR) otherwise than by equity shares</p> <p>a) Warrants/convertible securities/any other instrument that entitles the</p>	<p>6,37,800</p> <p>53,26,993</p>	<p>4.53%</p> <p>37.79%</p>	<p>4.53%</p> <p>37.79%</p>

acquirer to receive shares carrying voting rights in the TC (specify holding in each category)			
<b>b) Total (a+b+c+d)</b>	<b>59,64,793</b>	<b>42.32%</b>	<b>42.32%</b>
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired / sold	(6,37,800)	(4.53%)	(4.53%)
b) VRs acquired / sold 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) acquired/sold			
d) Shares encumbered / invoked / released by the acquirer			
<b>e) Total (a+b+c+d)</b>	<b>(6,37,800)</b>	<b>(4.53%)</b>	<b>(4.53%)</b>
<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights			
- Pushpa Jain (Seller)	-	-	-
- PAC (Composite Shareholding of promoters excluding that of Seller – Refer Annexure)	59,64,793	42.32%	42.32%
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 sale			
d) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)			
<b>e) Total (a+b+c+d)</b>	<b>59,64,793</b>	<b>42.32%</b>	<b>42.32%</b>
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	Sale of shares through off market inter-se transfer by way of Gift		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	25/09/2020		
Equity share capital / total voting capital of the TC before the said acquisition/sale	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.		

Total diluted share/voting capital of the TC after the said acquisition/sale	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.
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**Note:**

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Regulation 31 of SEBI (LODR) Regulations, 2015.

(\*\*) 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.

*Pushpa Jain*

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**PUSHPA JAIN**

**Signature of the Acquirer/ Seller/ ~~Authorized Signatory~~**

Place: Mumbai

Date: 26/09/2020

**Annexure: Shareholding of Acquirer and PAC**

Shareholding Details	Before the proposed transaction		Details of 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	No. of shares / voting rights	% w.r.t total share capital of TC
<b>Name of the Seller:</b>						
<b>Mrs. Pushpa Jain</b>	6,37,800	4.53%	(6,37,800)	(4.53%)	-	-
<b>Name of the PAC:</b>						
M/s. Jaipal Jain HUF	3,800	0.03%	-	-	3,800	0.03%
M/s. Atul Jain HUF	30,400	0.22%	-	-	30,400	0.22%
Mrs. Rashmi Jain	38,000	0.27%	-	-	38,000	0.27%
Mrs. Neena Jain	57,500	0.41%	-	-	57,500	0.41%
Mrs. Sudha Gupta	1,24,776	0.89%	-	-	1,24,776	0.89%
Mr. Vaibhav Jain	3,00,000	2.13%	-	-	3,00,000	2.13%
Mrs. Shobha Jain	5,30,112	3.76%	-	-	5,30,112	3.76%
Mrs. Shikha Vikas Gupta	-	-	6,37,800	4.53%	6,37,800	4.53%
Mr. Tarun Jain	8,41,489	5.97%	-	-	8,41,489	5.97%
Mr. Amit Jaipal Jain	9,25,752	6.57%	-	-	9,25,752	6.57%
M/s. Attar Construction Company Private Limited	9,93,800	7.05%			9,93,800	7.05%
Mr. Atul Jain	14,81,364	10.51%	-	-	14,81,364	10.51%
<b>TOTAL</b>	<b>59,64,793</b>	<b>42.32%</b>	-	-	<b>59,64,793</b>	<b>42.32%</b>

**Date: 26/09/2020**

To,  
**Corporate Relation Department**  
BSE Limited  
P.J. Tower, Dalal Street  
Mumbai – 400 001.  
**Scrip Code: 511131**

Dear Sir / Ma'am,

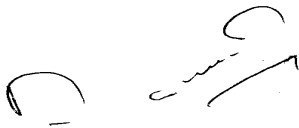
**Sub: Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

In accordance with the provisions of Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I wish to inform you that I have sold 10,00,478 equity shares of Kamanwala Housing Construction Limited, being 7.10% of total paid up Equity Share Capital, by way of Inter-se (Off market) transfer by way of Gift to Mrs. Shikha Vikas Gupta, being immediate relative on 25<sup>th</sup> September, 2020.

Accordingly, I enclose herewith the requisite disclosure duly signed.

**Thanking You,**

**Yours Faithfully,**



---

**Atul Jain**  
**Seller (Donor)**

Encl: As Above

CC:

**To,**  
**Company Secretary**  
**Kamanwala Housing Construction Limited**  
406, New Udyog Mandir – 2, Mogul Lane,  
Mahim (W), Mumbai, Maharashtra - 400016

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

Name of the Target Company (TC)	Kamanwala Housing Construction Limited		
Name(s) of the acquirer/seller and Persons Acting in Concert (PAC) with the acquirer / seller	<p><b>Seller:</b></p> <p>Mr. Atul Jain</p> <p><b>PAC:</b></p> <ol style="list-style-type: none"> <li>1. Jaipal Jain HUF</li> <li>2. Rashmi Jain</li> <li>3. Shikha Vikas Gupta</li> <li>4. Neena Jain</li> <li>5. Sudha Gupta</li> <li>6. Vaibhav Jain</li> <li>7. Shobha Jain</li> <li>8. Pushpa Jain</li> <li>9. Tarun Jain</li> <li>10. Amit Jaipal Jain</li> <li>11. Atul Jain HUF</li> <li>12. Attar Construction Company Private Limited</li> </ol>		
Whether the acquirer/seller belongs to Promoter/Promoter group	Promoter		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Ltd.		
Details of the acquisition / disposal as follows	<b>Number</b>	<b>% w.r.t. total share/voting capital wherever applicable (*)</b>	<b>% w.r.t. total diluted share/voting capital of the TC (**)</b>
<p><b>Before the acquisition/disposal under consideration, holding of:</b></p> <p>a) Shares carrying voting rights</p> <ul style="list-style-type: none"> <li>- Atul Jain (Seller)</li> <li>- PAC (Composite Shareholding of promoters excluding that of Seller – Refer Annexure)</li> </ul> <p>b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)</p> <p>c) Voting rights (VR) otherwise than by equity shares</p> <p>a) Warrants/convertible securities/any</p>	<p>10,00,478</p> <p>49,64,315</p>	<p>7.10%</p> <p>35.22%</p>	<p>7.10%</p> <p>35.22%</p>

other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)			
<b>b) Total (a+b+c+d)</b>	<b>59,64,793</b>	<b>42.32%</b>	<b>42.32%</b>
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired / sold	(10,00,478)	(7.10%)	(7.10%)
b) VRs acquired / sold 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) acquired/sold			
d) Shares encumbered / invoked / released by the acquirer			
<b>e) Total (a+b+c+d)</b>	<b>(10,00,478)</b>	<b>(7.10%)</b>	<b>(7.10%)</b>
<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights			
- Atul Jain (Seller)	4,80,886	3.41%	3.41%
- PAC (Composite Shareholding of promoters excluding that of Seller – Refer Annexure)	54,83,907	38.91%	38.91%
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 sale			
d) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)			
<b>e) Total (a+b+c+d)</b>	<b>59,64,793</b>	<b>42.32%</b>	<b>42.32%</b>
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	Sale of shares through off market inter-se transfer by way of Gift		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	25/09/2020		
Equity share capital / total voting capital of the TC before the said acquisition/sale	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.		

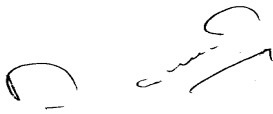


Total diluted share/voting capital of the TC after the said <del>acquisition</del> /sale	Rs. 14,09,31,600 divided into 1,40,93,160 equity shares of Rs. 10 each.
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**Note:**

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Regulation 31 of SEBI (LODR) Regulations, 2015.

(\*\*) 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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**ATUL JAIN**

**Signature of the Acquirer/ Seller/ ~~Authorized Signatory~~**

Place: Mumbai

Date: 26/09/2020

**Annexure: Shareholding of Acquirer and PAC**

Shareholding Details	Before the proposed transaction		Details of 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	No. of shares / voting rights	% w.r.t total share capital of TC
<b>Name of the Seller:</b>						
<b>Mr. Atul Jain</b>	14,81,364	10.51%	(10,00,478)	(7.10%)	4,80,886	3.41%
<b>Name of the PAC:</b>						
M/s. Jaipal Jain HUF	3,800	0.03%	-	-	3,800	0.03%
M/s. Atul Jain HUF	30,400	0.22%	-	-	30,400	0.22%
Mrs. Rashmi Jain	38,000	0.27%	-	-	38,000	0.27%
Mrs. Neena Jain	57,500	0.41%	-	-	57,500	0.41%
Mrs. Sudha Gupta	1,24,776	0.89%	-	-	1,24,776	0.89%
Mr. Vaibhav Jain	3,00,000	2.13%	-	-	3,00,000	2.13%
Mrs. Shobha Jain	5,30,112	3.76%	-	-	5,30,112	3.76%
Mrs. Pushpa Jain	6,37,800	4.53%	-	-	6,37,800	4.53%
Mr. Tarun Jain	8,41,489	5.97%	-	-	8,41,489	5.97%
Mr. Amit Jaipal Jain	9,25,752	6.57%	-	-	9,25,752	6.57%
M/s. Attar Construction Company Private Limited	9,93,800	7.05%			9,93,800	7.05%
Mrs. Shikha Vikas Gupta	-	-	10,00,478	7.10%	10,00,478	7.10%
<b>TOTAL</b>	<b>59,64,793</b>	<b>42.32%</b>	<b>-</b>	<b>-</b>	<b>59,64,793</b>	<b>42.32%</b>

**TARUN JAIN**

**ADDRESS: B-801, SAVOY RESIDENCY, TAGORE ROAD PODAR SCHOOL,  
SANTACRUZ WEST, MUMBAI - 400054.**

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May 6, 2020

To,  
BSE Limited,  
1st Floor, Rotunda Building,  
B.S. Marg, Fort, Mumbai - 400 001.

Dear Sir/Madam,

**Subject:** Submission of Disclosure under Regulation 30(2) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

**Ref: Scrip Code: 511131 Scrip Name: KAMANWALA**

With reference to abovementioned subject, we are enclosing herewith Disclosure for details of shareholdings of Promoter(s), members of Promoter Group and PAC with promoter(s), in prescribed form as on 31<sup>st</sup> March, 2020 in pursuance to Regulation 30(2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

We request to take the same on your records.

Thanking You,

**FOR KAMANWALA HOUSING CONSTRUCTION LIMITED**

**SD/-**

**TARUN JAIN**

**PROMOTER**

Encl: As Stated

CC to:

CS Sejal Desai

Company Secretary & Compliance Officer,

Kamanwala Housing Construction Limited

Mumbai.

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A- Details of Shareholding**

1.	Name of Target Company (TC)	<b>KAMANWALA HOUSING CONSTRUCTION LIMITED</b>		
2.	Name of Stock exchange (s) where the shares of the TC are listed.	BOMBAY STOCK EXCHANGE		
3.	Particulars of the shareholder(s) :  a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.  Or b. Name(s) of promoter(s), member of the promoter group and PAC with him.	NA  1. JAIPAL JAIN HUF 2. ATUL JAIN 3. RASHMI JAIN 4. NEENA JAIN 5. SUDHA GUPTA 6. VAIBHAV JAIN 7. SHOBHA JAIN 8. PUSHPA JAIN 9. TARUN JAIN 10. AMIT JAIPAL JAIN 11. ATUL JAIN HUF 12. ATTAR CONSTRUCTION CO. PVT. LTD.		
4.	Particulars of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
	As of March 31, 2020 holding of:  a) Shares			
	1. JAIPAL JAIN HUF			
	2. ATUL JAIN	3800	0.027%	0.027%
	3. RASHMI JAIN	1481364	10.511%	10.511%
	4. NEENA JAIN	38000	0.270%	0.270%
	5. SUDHA GUPTA	57500	0.408%	0.408%
	6. VAIBHAV JAIN	124776	0.885%	0.885%
	7. SHOBHA JAIN	300000	2.129%	2.129%
	8. PUSHPA JAIN	530112	3.761%	3.761%
	9. TARUN JAIN	637800	4.526%	4.526%
	10. AMIT JAIPAL JAIN	841489	5.971%	5.971%
	11. ATUL JAIN HUF	925752	6.569%	6.569%
	12. ATTAR	30400	0.216%	0.216%
	CONSTRUCTION CO. PVT. LTD.	993800	7.052%	7.052%

b) Voting Rights (Otherwise than by shares) c) Warrants d) Convertible Securities e) Any other instrument that would entitle the holder to receive shares in the TC.			
<b>Total</b>	<b>5964793</b>	<b>42.323%</b>	<b>42.323%</b>

**Part-B\*\***

**Name of the Target Company: KAMANWALA HOUSING CONSTRUCTION LIMITED**

Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter/ Promoter group	PAN of the person and PACs
JAIPAL JAIN HUF	PROMOTER	AAAHJ1194C
ATUL JAIN	PROMOTER	AADPJ0686L
RASHMI JAIN	PROMOTER	AEYPJ5824P
NEENA JAIN	PROMOTER	ADAPJ3987A
SUDHA GUPTA	PROMOTER	AADPG5038M
VAIBHAV JAIN	PROMOTER	AGGPJ1826M
SHOBHA JAIN	PROMOTER	AADPJ7486J
PUSHPA JAIN	PROMOTER	ABDPJ1082D
TARUN JAIN	PROMOTER	AAAPJ7554Q
AMIT JAIPAL JAIN	PROMOTER	AAAPJ7555R
ATUL JAIN HUF	PROMOTER	AAEHA1832J
ATTAR CONSTRUCTION CO. PVT. LTD.	PROMOTER	AAACA0971H

**FOR KAMANWALA HOUSING CONSTRUCTION LIMITED**

**SD/-**

**TARUN JAIN  
PROMOTER**

**Place: Mumbai**

**Date: 06.05.2020**

Note:

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.
2. (\*) 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.
3. (\*\*) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.

**TARUN JAIN**

**ADDRESS: B-801, SAVOY RESIDENCY, TAGORE ROAD PODAR SCHOOL,  
SANTACRUZ WEST, MUMBAI - 400054.**

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May 25, 2020

To,  
BSE Limited,  
1st Floor, Rotunda Building,  
B.S. Marg, Fort, Mumbai - 400 001.

Dear Sir/Madam,

**Subject:** Submission of Disclosure under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

**Ref: Scrip Code: 511131 Scrip Name: KAMANWALA**

With reference to abovementioned subject, we are enclosing herewith yearly Disclosure under regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 from the promoters of the Company for the year ended on 31<sup>st</sup> March, 2020 for your kind perusal.

We request to take the same on your records.

Thanking You,

**FOR KAMANWALA HOUSING CONSTRUCTION LIMITED**

**SD/-**

**TARUN JAIN  
PROMOTER**

Encl: As Stated

CC to:

CS Sejal Desai

Company Secretary & Compliance Officer,

Kamanwala Housing Construction Limited

Mumbai.

May 25, 2020

To,  
BSE Limited,  
1st Floor, Rotunda Building,  
B.S. Marg, Fort, Mumbai - 400 001.

**Sub: Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011.**

Dear Sir/Madam,

Name of Target Company (TC)	Kamanwala Housing Construction Limited
Name(s) of the Stock Exchange(s) where the shares of the TC are listed	Bombay Stock Exchange Limited
Name(s) of promoter(s), member of the promoter group and PAC with him.	1. JAIPAL JAIN HUF 2. ATUL JAIN 3. RASHMI JAIN 4. NEENA JAIN 5. SUDHA GUPTA 6. VAIBHAV JAIN 7. SHOBHA JAIN 8. PUSHPA JAIN 9. TARUN JAIN 10. AMIT JAIPAL JAIN 11. ATUL JAIN HUF 12. ATTAR CONSTRUCTION CO. PVT. LTD.

Pursuant to the provisions of the Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeover) Regulations, 2011, I on behalf of all the promoters along with member of promoter group and persons acting in concert, hereby declare that we have not made any encumbrance, directly or indirectly, other than those already disclosed during the financial year 2019-20.

The summary of the Promoters shareholding and encumbrance as on 31<sup>st</sup> March, 2020 is given below:

<b>Particulars</b>	<b>As on 31.03.2020</b>
Total promoter shareholding	59,64,793
Total Encumbered shares	4,92,500
Encumbered shares as a % of promoter shareholding	8.26%

We request you to kindly take note of the same.

Thanking You,

**FOR KAMANWALA HOUSING CONSTRUCTION LIMITED**

**SD/-**

**TARUN JAIN  
PROMOTER**

**Place: Mumbai  
Date: 25.05.2020**