

**THINKFAR TRADELINK PRIVATE LIMITED**  
**CIN : U51909GJ2022PTC135522**  
**Registered Office : 10<sup>TH</sup> Floor, Kataria Arcade,**  
**Off S G Highway, Post Makarba, Ahmedabad – 380051**  
**Email ID : thinkfartradelink@gmail.com Ph : 079-26838000**

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13.01.2023

The General Manager BSE Ltd. Phiroze Jeejeebhoy Towers Dalal Street Mumbai 400 001	The Asst Vice President National Stock Exchange of India Ltd. Exchange Plaza, 5 <sup>th</sup> Floor Plot No. C/1, G Block Bandra Kurla Complex Bandra (East) Mumbai - 400051	The Company Secretary Sanghi Industries Limited Sanghinagar P.O. Hayatnagar Mandal, R R District Telangana – 501511
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Dear Sir,

**Sub : Disclosure under Regulation 31(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations 2011 along with disclosure of reason of encumbrance of shares.**

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Please find enclosed herewith the Disclosure under Regulation 31(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for creation of Pledge of Shares in the prescribed format as **Annexure 1**.

Further, please find enclosed herewith the Disclosure of Reasons for encumbrance of shares of Sanghi Industries Limited pledged by Thinkfar Tradelink Private Limited on 12<sup>th</sup> January, 2023 in pursuance of SEBI Circular SEBI/HO/CFD/DCR1/CIR/P/2019/90 Dated 7<sup>th</sup> August 2019, as **Annexure 2**.

Kindly find the above in order and take the same on record.

Thanking you,  
**Yours faithfully,**  
**For Thinkfar Tradelink Private Limited**

**Alok Sanghi**  
**Director**  
**DIN: 00033506**

Encl : As above

**Format for disclosure by the Promoter(s) to the stock exchanges and to the Target Company for encumbrance of shares / invocation of encumbrance/ release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Name of the Target Company(TC)	Sanghi Industries Limited
Names of the stock exchanges where the shares of the target company are listed	National Stock Exchange of India Ltd. (NSE) BSE Ltd. (BSE)
Date of reporting	13 <sup>th</sup> January, 2023
Name of the Promoter or PAC on whose shares encumbrance has been created/ invoked/ released	Thinkfar Tradelink Private Limited

**Details of the creation/~~invocation~~/release of encumbrance :**

Name of the Promoter(s) or PACs with him	Promoter holding in the target company (1)		Promoter holding already encumbered (2)		Details of events pertaining to encumbrance (3)							Post event holding of encumbered shares (creation (2)+(3)/ release ((2)-(3))/ invocation ((2)-(3)))	
	Number	% of total share capital	Number	% of total share capital	Type of event (creation / invocation / release)	Date of creation/ invocation/ release	Type of encumbrance (pledge/ lien/ non disposal undertaking/ others)	Reasons for encumbrance	Number	% of total share capital	Name of the entity in whose favor shares encumbered	Number	% of total share capital
Thinkfar Tradelink Private Limited	73,26,000	2.84	0	0.00	Creation	12/01/2023	*Pledge	Security for Borrowings by way of issue of NCDs	73,26,000	2.84	VISTRA ITCL (INDIA) LIMITED, acting as Debenture Trustee for unlisted, unrated,	73,26,000	2.84

											secured, redeemabl e, non- convertibl e Debenture s allotted to Kotak Special Situation Fund (KSSF)		
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\*Note: Thinkfar Tradelink Private Limited is creating pledge on its 73,26,000 Equity Shares of Sanghi Industries Limited in favor of M/s Vistra ITCL (India) Limited, Debenture Trustee for the purpose of securing issue of Unlisted Unrated Secured Redeemable Non-Convertible Debentures (NCD) of Sanghi Industries Limited and of M/s Thinkfar Tradelink Private Limited.

**For Thinkfar Tradelink Private Limited**

Date : 13.01.2023  
Place: Ahmedabad

**Alok Sanghi**  
**Director**  
**DIN:00033506**

## Annexure – II

### Disclosure of reasons for encumbrance

(In addition to Annexure – I prescribed by way of circular dated August 05, 2015)

Name of listed company	Sanghi Industries Limited
Name of the recognised stock exchanges where the shares of the company are listed	National Stock Exchange of India Ltd. (NSE) BSE Ltd. (BSE)
Name of the promoter(s) / PACs whose shares have been encumbered	Thinkfar Tradelink Private Limited
Total Promoter shareholding in the listed company	No. of equity shares – 18,78,64,629 (Holding of Promoter / Promoter Group) in the Company which is 72.72% of total paid up equity share capital.
Encumbered shares as a % of promoter shareholding	18,57,67,241 encumbered (pledged / NDU) equity shares is 98.88% of promoter shareholding (including the present encumbrance)
Whether encumbered share is 50% or more of promoter shareholding	Yes
Whether encumbered share is 20% or more of total share capital	Yes

### For Thinkfar Tradelink Private Limited

**Alok Sanghi**  
**Director**  
**DIN: 00033506**

**Date: 13.01.2023**  
**Place: Ahmedabad**

**Details of all the existing events/agreements pertaining to encumbrance**

		<b>Encumbrance – 1</b> <b>(Date of creation of encumbrance: 12.01.2023)</b>
<b>Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)</b>		Pledge
<b>No. and % of shares encumbered</b>		No. of shares: 7326000 % of total share capital: 2.84%
<b>Specific details about the encumbrance</b>	<b>Name of the entity in whose favour shares encumbered (X)</b>	VISTRA ITCL (INDIA) LIMITED, acting as Debenture Trustee for unlisted, unrated, secured, redeemable, non-convertible Debentures allotted to Kotak Special Situation Fund (KSSF)
	<b>Whether the entity X is a schedule commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.</b>	No. Entity is a Debenture Trustee
	<b>Names of all other entities in the agreement</b>	Nil
	<b>Whether the encumbrance is relating to any debt instrument viz. Debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating</b>	Yes. VISTRA ITCL (INDIA) LIMITED is acting as Debenture Trustee for 5,000 Unlisted, Unrated Secured Non Convertible Debentures (NCD) of face value of Rs. 1000000 each which is allotted by Sanghi Industries Limited and 500 NCD of Rs. 1000000 each by Thinkfar Tradelink Private Limited to Kotak Special Situation Fund (KSSF)
<b>Security Cover Asset Cover</b>	<b>Value of shares on the date of event / agreement (A)*</b>	541391400
	<b>Amount involved - Sanctioned Amount (against which shares have been encumbered) (B)</b>	5500000000
	<b>Ratio A / B</b>	0.10
<b>End use of money</b>	<b>Borrowed amount to be utilized for what purpose-</b>  <b>(a) Personal use by promoters and PACs</b>  <b>(b) For the benefit of listed company</b>  <b>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.</b>	For the benefit of listed company. Thinkfar Tradelink Private Limited is creating pledge on 73,26,000 Equity Shares of Sanghi Industries Limited in favor of M/s Vistra ITCL (India) Limited for the purpose of securing issue of Unlisted Unrated Secured Redeemable Non-Convertible Debentures (NCD) of Sanghi Industries Limited and of M/s Thinkfar Tradelink Private Limited

\*Closing price was taken from National Stock Exchange of India Limited as on date of pledge creation

**For Thinkfar Tradelink Private Limited**

Date: 13.01.2023  
Place: Ahmedabad

**Alok Sanghi**  
**Director**  
**DIN: 00033506**