



# RACL Geartech Ltd.

Corporate Office

B-9, Sector-3, Noida, Uttar Pradesh-201301, INDIA

Phone: +91-120-4588500 Fax: +91-120-4588513

Web: www.raclgeartech.com E-mail: info@raclgeartech.com

5<sup>th</sup> January, 2021

To,  
**BSE Limited**  
25<sup>th</sup> Floor, P. J. Towers,  
Dalal Street,  
Mumbai - 400 001

**Scrip Code: 520073**

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

Dear Sir/Madam,

Please find attached herewith the Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 received from Middleware Development Limited ("Shareholder") in respect of change in shareholding exceeding 2% of the Total Shareholding of the Company on account of sale of shares by the aforesaid Shareholder.

You are requested to take the same on record and oblige.

Thanking you,

**For RACL Geartech Limited**

  
  
**Shagun Bajpai**  
**Company Secretary & Compliance Officer**

Encl: As above

Registered Office

15th Floor, Eros Corporate Tower, Nehru Place, New Delhi-110019, INDIA

Phone: +91-11-66155129

CIN: L34300DL1983PLC016136

D-U-N-S Number: 65-013-7086



TS 16949 : 2009  
TS 518901 - 000

# MIDDLEWARE DEVELOPMENT LTD.

Company Number 095702

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103 Sham Peng Tong Plaza, Victoria, Mahe, Seychelles.

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5<sup>th</sup> January, 2021

To,  
BSE Limited  
25<sup>th</sup> Floor, P. J. Towers,  
Dalal Street,  
Mumbai - 400 001

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

Dear Sir/Madam,

Pursuant to Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, please find attached herewith the requisite Disclosure in respect of change in shareholding of Middleware Development Limited, exceeding 2% of the Total Shareholding of the Target Company RACL Geartech Ltd(BSE:520073) on account of sale of shares.

You are requested to take the same on record and oblige.

Thanking you,

**For Middleware Development Limited**



**Authorised Signatory**

Encl: As above

Cc: RACL Geartech Limited  
B-9, Sector-3, Noida- 201301



Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011			
Name of the Target Company (TC)	RACL Geartech Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Middleware Development Limited		
Whether the acquirer belongs to Promoter/Promoter group	No		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited		
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 sale under consideration, holding of :</b>			
a) Shares carrying voting rights	10,00,000	9.27	9.27
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)	10,00,000	9.27	9.27
<b>Details of Sale</b>			
a) Shares carrying voting rights sold	2,16,000	2.00	2.00
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)	2,16,000	2.00	2.00
<b>After the sale, holding of:</b>			
a) Shares carrying voting rights	7,84,000	7.27	7.27
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)	7,84,000	7.27	7.27
Mode of sale (e.g. open market/ off-market/ public issue/ rights issue/ preferential allotment/ inter-se transfer etc).	Open Market		
Date of sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	25-11-2019 to 04-01-2021		
Equity share capital/ total voting capital of the TC before the said sale	1,07,81,600		
Equity share capital/ total voting capital of the TC after the said sale	1,07,81,600		
Total diluted share/voting capital of the TC after the said acquisition	1,07,81,600		
(*) 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 Middleware Development Limited

  
Authorised Signatory

Date: 05-01-2021