

Date: 16.12.2023

The Manager Department of Corporate Services The National Stock Exchange of India Ltd. Exchange Plaza, 5 <sup>th</sup> Floor, Plot No. C/1, G Block, Bandra Kurla Complex, Bandra (E), <u>Mumbai 400 051</u> <u>Scrip Code: 5251</u>	The Manager Department of Corporate Services Bombay Stock Exchange Ltd. Phiroze Jeejeebhoy Towers 25 <sup>th</sup> Floor, Dalal Street, <u>MUMBAI – 400 001</u>  <u>Scrip Code: 514234</u>
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**Ref.: Disclosure regulation 29(2) of SEBI (Substantial Acquisition of Shares & Takeover) Regulations, 2011**

Dear Sir,

With reference to above captioned subject, We Promoter/Promoters Group/PAC (Person acting in concert) of M/s Sangam (India) Limited, having registered office at Atun, Chittorgarh Road, Bhilwara-311001, submitting the revised disclosure pursuant to the regulations 29(2) of SEBI (Substantial Acquisition of Shares & Takeover) Regulations, 2011.

We request you to kindly take the above on record.

Thanking you

**For and on behalf of Promoter  
& Promoter Group**

*Ram Pal Soni*

**Ram Pal Soni  
Promoter**

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

Name of the Target Company (TC)	Sangam (India) Limited		
Names of the Acquirer and Persons Acting in Concert (PAC)	<p><b><u>Acquirer</u></b>  NEELGAGAN COMMERCIAL CO LTD.  SAHYOG FINANCE LTD  SANGAM FINCAP LTD  Sangam E-com Limited</p> <p><b><u>Persons Acting in Concert (PAC)</u></b>  Ram Pal Soni  Radha Devi Soni  Anurag Soni  Shri Niwas Modani  Mamta Modani  Archana Sodani  Anjana Soni Thakur  Antima Soni  Vinod Kumar Sodani  Pranal Modani  BADRILAL RAMPAL SONI HUF  RAMPAL SONI HUF  VINOD KUMAR SODANI HUF  HAWAMAHAL FINANCE PVT LTD  SANGAM SUITING PVT LTD  SARVODAYA HOLDING PVT LTD  SANGAM INFRATECH LIMITED  NECCO SHIPPING COMPANY PVT LTD  Nidhi Merchantile Ltd  SANGAM BUSINESS CREDIT LTD</p>		
Whether the Acquirer/ Seller belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	National Stock Exchange of India Limited BSE Limited		
Details of the acquisition as follows	Number	% w.r.t. total share/voting capital wherever applicable	% w.r.t. total diluted share/voting capital of the TC
Before the acquisition/ disposal under consideration, holding of (as on last date of Disclosure dated 03.01.2023 :			
a) Shares carrying voting rights			
1. Ram Pal Soni	2153950	4.42%	4.42%

2. Radha Devi Soni	977761	2.01%	2.01%
3. Anurag Soni	4438665	9.11%	9.11%
4. Shri Niwas Modani	624779	1.28%	1.28%
5. Mamta Modani	630404	1.29%	1.29%
6. Archana Sodani	610774	1.25%	1.25%
7. Anjana Soni Thakur	303750	0.62%	0.62%
8. Antima Soni	346050	0.71%	0.71%
9. BADRILAL RAMPAL SONI HUF	0	0.00%	0.00%
10. RAMPAL SONI HUF	248300	0.51%	0.51%
11. VINOD KUMAR SODANI HUF	5000	0.01%	0.01%
12. FINWORTH INVESTMENT PVT LTD	0	0.00%	0.00%
13. HAWAMAHAL FINANCE PVT LTD	2335500	4.79%	4.79%
14. NECCO SHIPPING COMPANY PVT LTD	1274744	2.62%	2.62%
15. NEELGAGAN COMMERCIAL CO LTD.	1400000	2.87%	2.87%
16. NIKITA CREDITS PVT LTD	0	0.00%	0.00%
17. PARK VIEW INVESTMENT PVT LTD	0	0.00%	0.00%
18. SAHYOG FINANCE LTD	232750	0.48%	0.48%
19. SANGAM E COM LIMITED	8767542	17.99%	17.99%
20. SANGAM FINCAP LTD	2216145	4.55%	4.55%
21. SANGAM GRANITES PVT LTD	0	0.00%	0.00%
22. SANGAM SUITING PVT LTD	1112685	2.28%	2.28%
23. SARVODAYA HOLDING PVT LTD	1127771	2.31%	2.31%
24. SCORPIO CREDITS PVT LTD	0	0.00%	0.00%
25. SANGAM INFRATECH LIMITED	0	0.00%	0.00%
26. SANGAM BUSINESS CREDIT LTD	0	0.00%	0.00%
27. Vinod Kumar Sodani	6,25,000	1.28%	1.28%
28. Pranal Modani	5,00,000	1.03%	1.03%
29. NIDHI MERCHANTILES LIMITED	38,28,868	7.85%	7.85%
<b>TOTAL</b>	<b>33760438</b>	<b>69.26%</b>	<b>69.26%</b>
b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/ others)	NIL	NA	NA
c) Voting rights (VR) otherwise than by equity shares	NIL	NA	NA
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)	NIL	NA	NA
<b>Total (a+b+c+d)</b>	<b>33760438</b>	<b>69.26%</b>	<b>69.26%</b>
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/sold			
1. Ram Pal Soni	0	-0.13%	-0.13%
2. Radha Devi Soni	0	-0.06%	-0.06%
3. Anurag Soni	0	-0.27%	-0.27%
4. Shri Niwas Modani	0	-0.04%	-0.04%
5. Mamta Modani	0	-0.04%	-0.04%
6. Archana Sodani	0	-0.04%	-0.04%
7. Anjana Soni Thakur	0	-0.02%	-0.02%



8. Antima Soni	0	-0.02%	-0.02%
9. BADRILAL RAMPAL SONI HUF	0	0.00%	0.00%
10. RAMPAL SONI HUF	0	-0.02%	-0.02%
11. VINOD KUMAR SODANI HUF	0	0.00%	0.00%
12. FINWORTH INVESTMENT PVT LTD	0	0.00%	0.00%
13. HAWAMAHAL FINANCE PVT LTD	0	-0.14%	-0.14%
14. NECCO SHIPPING COMPANY PVT LTD	0	-0.08%	-0.08%
15. NEELGAGAN COMMERCIAL CO LTD.	200000	0.31%	0.31%
16. NIKITA CREDITS PVT LTD	0	0.00%	0.00%
17. PARK VIEW INVESTMENT PVT LTD	0	0.00%	0.00%
18. SAHYOG FINANCE LTD	400000	0.78%	0.78%
19. SANGAM E COM LIMITED	800000	1.06%	1.06%
20. SANGAM FINCAP LTD	100000	0.06%	0.06%
21. SANGAM GRANITES PVT LTD	0	0.00%	0.00%
22. SANGAM SUITING PVT LTD	0	-0.07%	-0.07%
23. SARVODAYA HOLDING PVT LTD	0	-0.07%	-0.07%
24. SCORPIO CREDITS PVT LTD	0	0.00%	0.00%
25. SANGAM INFRATECH LIMITED	0	0.00%	0.00%
26. SANGAM BUSINESS CREDIT LTD	0	0.00%	0.00%
27. Vinod Kumar Sodani	0	-0.04%	-0.04%
28. Pranal Modani	0	-0.03%	-0.03%
29. NIDHI MERCHANTILES LIMITED	0	-0.23%	-0.23%
<b>TOTAL</b>	<b>15,00,000</b>	<b>0.92%</b>	<b>0.92%</b>
b) VRs acquired /sold otherwise than by shares	Nil	NA	NA
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	NA	NA
d) Shares encumbered/ invoked/released by the acquirer	Nil	NA	NA
<b>Total (a+b+c+d)</b>	<b>15,00,000</b>	<b>0.92%</b>	<b>0.92%</b>
<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights			
1. Ram Pal Soni	2153950	4.29%	4.29%
2. Radha Devi Soni	977761	1.95%	1.95%
3. Anurag Soni	4438665	8.83%	8.83%
4. Shri Niwas Modani	624779	1.24%	1.24%
5. Mamta Modani	630404	1.25%	1.25%
6. Archana Sodani	610774	1.22%	1.22%
7. Anjana Soni Thakur	303750	0.60%	0.60%
8. Antima Soni	346050	0.69%	0.69%
9. BADRILAL RAMPAL SONI HUF	0	0.00%	0.00%
10. RAMPAL SONI HUF	248300	0.49%	0.49%
11. VINOD KUMAR SODANI HUF	5000	0.01%	0.01%
12. FINWORTH INVESTMENT PVT LTD	0	0.00%	0.00%
13. HAWAMAHAL FINANCE PVT LTD	2335500	4.65%	4.65%
14. NECCO SHIPPING COMPANY PVT LTD	1274744	2.54%	2.54%

15. NEELGAGAN COMMERCIAL CO LTD.	1600000	3.18%	3.18%
16. NIKITA CREDITS PVT LTD	0	0.00%	0.00%
17. PARK VIEW INVESTMENT PVT LTD	0	0.00%	0.00%
18. SAHYOG FINANCE LTD	632750	1.26%	1.26%
19. SANGAM E COM LIMITED	9567542	19.04%	19.04%
20. SANGAM FINCAP LTD	2316145	4.61%	4.61%
21. SANGAM GRANITES PVT LTD	0	0.00%	0.00%
22. SANGAM SUITING PVT LTD	1112685	2.21%	2.21%
23. SARVODAYA HOLDING PVT LTD	1127771	2.24%	2.24%
24. SCORPIO CREDITS PVT LTD	0	0.00%	0.00%
25. SANGAM INFRATECH LIMITED	0	0.00%	0.00%
26. SANGAM BUSINESS CREDIT LTD	0	0.00%	0.00%
27. Vinod Kumar Sodani	6,25,000	1.24%	1.24%
28. Pranal Modani	5,00,000	1.00%	1.00%
29. NIDHI MERCHANTILES LIMITED	38,28,868	7.62%	7.62%
<b>TOTAL</b>	<b>3,52,60,438</b>	<b>70.17%</b>	<b>70.17%</b>
b) Shares encumbered with the acquirer	Nil	NA	NA
c) VRs otherwise than by equity shares	Nil	NA	NA
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	NA	NA
<b>e) Total (a+b+c+d)</b>	<b>3,52,60,438</b>	<b>70.17%</b>	<b>70.17%</b>
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue /preferential allotment / inter-se transfer etc.)	preferential allotment		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	02.06.2023		
Equity share capital / total voting capital of the TC before the said acquisition/sale	INR 487,465,590/- (Indian Rupees Forty Eight Crores Seventy Four Lacs Sixty Five Thousand and Five Hundred and Ninety Only) divided into 48,746,559 (Four Crores Eighty Seven Lacs Forty Six Thousand Five Hundred and Fifty Nine) Equity Shares of face value of INR 10/- (Indian Rupees Ten Only) each.		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	INR 502,465,590/- (Indian Rupees Fifty Crores Twenty Four Lacs Sixty Five Thousand and Five Hundred and Ninety Only) divided into 50,246,559 (Four Crores Eighty Seven Lacs Forty Six Thousand Five Hundred and Fifty Nine) Equity Shares of face value of INR 10/- (Indian Rupees Ten Only) each.		

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

INR 502,465,590/- (Indian Rupees Fifty Crores Twenty Four Lacs Sixty Five Thousand and Five Hundred and Ninety Only) divided into 50,246,559 (Four Crores Eighty Seven Lacs Forty Six Thousand Five Hundred and Fifty Nine) Equity Shares of face value of INR 10/- (Indian Rupees Ten Only) each.

**For and on Behalf of Promoters and Promoters Group**

*Ram Pal Soni*  
**Ram Pal Soni**

**Promoter**

Date: 16th December 2023