



February 10, 2022

<p><b>To,</b> <b>BSE Limited</b> <b>Listing Department</b> 25<sup>th</sup> Floor, P J Towers, Dalal Street Mumbai -400001  Stock Code. <b>500456</b></p>	<p><b>To,</b> <b>Manager – Listing Compliances</b> <b>National Stock Exchange Of India Ltd.</b> Exchange Plaza Bandra Kurla Complex Bandra (E), Mumbai-400051  Stock Code: <b>PASUPTAC</b></p>
--	--

**Sub: Disclosure in terms of Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011**

Dear Sir/Ma'am,

Please find enclosed herewith the disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as received from Mr. Manish Jain ("Transferor/Donor") with regard to transfer/disposal of 44,29,232 number of equity shares of **Pasupati Acrylon Limited** to Mr. Vineet Jain.

The above transaction is an inter-se transfer of shares between immediate relatives and promoters by way of gift without any consideration.

However, there is no change in the aggregate shareholding of Promoter and Promoter Group, pre & post the above inter-se transfer and the aggregate shareholding of Promoter & Promoter Group remains the same.

This is for your information and records.

Thanking You,

Yours faithfully,

**For Pasupati Acrylon Limited**

**Bharat Kapoor**

**Company Secretary & Compliance Officer**

**PASUPATI ACRYLON LTD.**  
Encl: As above

February 10, 2022

<p>To, <b>BSE Limited</b> <b>Listing Department</b> 25<sup>th</sup> Floor, P J Towers, Dalal Street Mumbai -400001  Stock Code. <b>500456</b></p>	<p>To, <b>Manager – Listing Compliances</b> <b>National Stock Exchange Of India Ltd.</b> Exchange Plaza Bandra Kurla Complex Bandra (E), Mumbai-400051  Stock Code: <b>PASUPTAC</b></p>
---	---

Sub: Disclosure in terms of Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Dear Sir/Madam,

I, Manish Jain, being one of the member of the Promoter Group of **Pasupati Acrylon Limited** ("the Company") hereby submit the requisite disclosure in terms of Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, with regard to change in my shareholding in view of inter-se transfer (disposal) of 44,29,232 equity shares of the Company to my brother – Mr. Vineet Jain by way of gift through off-market transaction.

This is for your information and records.

Thanking You,

Yours faithfully,



**MANISH JAIN**  
(Transferor/Donor)

C.C. **Company Secretary & Compliance Officer**  
**Pasupati Acrylon Limited**  
Regd. Office:  
Thakurdwara  
Kashipur Road  
Dist. Moradabad (U.P.) - 244601

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

**Part-A- Details of the Transfer**

Name of the Target Company (TC)	Pasupati Acrylon Limited		
Name(s) of the Transferor and Persons Acting in Concert (PAC) with the transferor	<b>Manish Jain (Transferor)</b> <b>Other Promoters/PACs:</b> Vineet Jain (Acquirer) Gurukripa Finvest Private Limited Sulabh Plantation & Finance Private Limited Arihant Exports Limited Shubh Exim Limited The Pradeshiya Industrial And Investment Corporation of UP Ltd. Sind-Wave Finance Services Private Limited Prabhat Capial Services Limited Accurex Traders Private Limited Inder Overseas Private Limited Vinod Kumar Jain HUF MVA Finance Private Limited Nityanand Exports and Consultants Company Limited		
Whether the transferor belongs to Promoter/Promoter group	Yes, both Acquirer and Transferor are part of Promoter and Promoter Group.		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited  National Stock Exchange of India Limited		
Details of the transfer/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 transfer/disposal under consideration, holding of transferor alongwith PACs:</b>			
a) Shares carrying voting rights	44,29,232 (Individually)	4.97	4.97
Refer Annexure - A	5,87,15,445 (Together with other Promoters / PACs)	65.87	65.87
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 transferor to receive shares carrying voting rights in the TC (specify holding in each category)	-	-	-
<b>e) Total (a+b+c+d) (individually)</b>	<b>44,29,232</b>	<b>4.97</b>	<b>4.97</b>
<b>Total (a+b+c+d) (alongwith other promoters/PACs)</b>	<b>5,87,15,445</b>	<b>65.87</b>	<b>65.87</b>

*Manish Jain*

Details of transfer/disposal:	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
a) Shares carrying voting rights transferred	44,29,232	4.97	4.97
b) Voting Rights (VRs) transferred otherwise than by equity shares	-	-	-
c) Warrants/convertible securities/any other instrument that entitles the transferor to receive shares carrying voting rights in the TC (specify holding in each category required) transferred/sold	-	-	-
d) Shares encumbered / invoked/released by the acquirer	-	-	-
<b>e) Total (a+b+c+d)</b>	<b>44,29,232</b>	<b>4.97</b>	<b>4.97</b>
After the transfer, holding of transferor alongwith PACs :	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
a) Shares carrying voting rights	Nil (Individually)	Nil	Nil
Refer Annexure - A	5,87,15,445 (Together with other promoters /PACs)	65.87	65.87
b) Shares encumbered with the transfer	-	-	-
c) Voting Rights (VRs) otherwise than by equity shares	-	-	-
d) Warrants/convertible securities/any other instrument that entitles the transferor to receive shares carrying voting rights in the TC (specify holding in each category required)after transfer	-	-	-
<b>e) Total (a+b+c+d) (individually)</b>	<b>Nil</b>	<b>Nil</b>	<b>Nil</b>
<b>Total (a+b+c+d) (alongwith other promoters / PACs)</b>	<b>5,87,15,445</b>	<b>65.87</b>	<b>65.87</b>
Mode of sale/transfer (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer, etc.)	Inter-se transfer between immediate relatives and promoters by way of gift without any consideration		
Date of transfer / disposal/sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	8th February, 2022		
Equity share capital / total voting capital of the TC before the said transfer	8,91,33,121 Equity Shares of Rs. 10/- each		
Equity share capital/ total voting capital of the TC after the said transfer	8,91,33,121 Equity Shares of Rs. 10/- each		
Total diluted share/voting capital of the TC after the said transfer	8,91,33,121 Equity Shares of Rs. 10/- each		

*Manish Jain*

MANISH JAIN  
(Transferor/Seller)

Place: New Delhi

Date: 10.02.2022

## Shareholding of Transferor and PACs

Shareholding Details		Pre-transaction			Transaction			Post-transaction				
		No. of shares/ voting rights	% w.r.t total share capital	% w.r.t total diluted share capital	No. of shares/ voting rights	% w.r.t total share capital	% w.r.t total diluted share capital	No. of shares/ voting rights	% w.r.t total share capital of TC	% w.r.t total diluted share capital		
a.	<b>Acquirer/Transferee (Donee) :</b>											
	Vineet Jain	1,24,22,422	13.94	13.94	44,29,232	4.97	4.97	1,68,51,654	18.91	18.91		
b.	<b>Seller/Transferor (Donor) :</b>											
	Manish Jain	44,29,232	4.97	4.97	-44,29,232	-4.97	-4.97	-	-	-		
c.	<b>Other PACs :</b>											
1	Gurukripa Finvest Private Limited	90,00,000	10.10	10.10	-	-	-	90,00,000	10.10	10.10		
2	Sulabh Plantation & Finance Private Limited	82,50,000	9.25	9.25	-	-	-	82,50,000	9.25	9.25		
3	Arihant Exports Limited	46,27,867	5.19	5.19	-	-	-	46,27,867	5.19	5.19		
4	Shubh Exim Limited	45,00,000	5.05	5.05	-	-	-	45,00,000	5.05	5.05		
5	The Pradeshiya Industrial And Investment Corporation of UP Ltd.	44,81,752	5.03	5.03	-	-	-	44,81,752	5.03	5.03		
6	Sind-Wave Finance Services Private Limited	40,00,000	4.49	4.49	-	-	-	40,00,000	4.49	4.49		
7	Prabhat Capital Services Limited	35,00,000	3.92	3.92	-	-	-	35,00,000	3.92	3.92		
8	Accurex Traders Private Limited	17,50,000	1.96	1.96	-	-	-	17,50,000	1.96	1.96		
9	Inder Overseas Private Limited	10,00,000	1.12	1.12	-	-	-	10,00,000	1.12	1.12		
10	Vinod Kumar Jain HUF	6,03,342	0.68	0.68	-	-	-	6,03,342	0.68	0.68		
11	MVA Finance Private Limited	1,44,450	0.16	0.16	-	-	-	1,44,450	0.16	0.16		
12	Nityanand Exports and Consultants Company Limited	6,380	0.01	0.01	-	-	-	6,380	0.01	0.01		
	<b>Total</b>	<b>5,87,15,445</b>	<b>65.87</b>	<b>65.87</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>5,87,15,445</b>	<b>65.87</b>	<b>65.87</b>	<b>65.87</b>	<b>65.87</b>

*Manish Jain*  
Manish Jain

Transferor and Promoter

Place: New Delhi

Date: 10.02.2022

**Part-B**

Name of the Target Company

Pasupati Acrylon Limited

Name(s) of the Transferor and Persons Acting in Concert (PAC) with the Transferor	Whether the Transferor belongs to Promoter/Promoter group	PAN of the person and PACs
<b>Seller/Transferor (Donor):</b>		
(1) Manish Jain	Yes	AADPJ8524F
<b>Acquirer/Transferee (Donee):</b>		
(2) Vineet Jain	Yes	AAFPJ7478L
<b>Other PACs:</b>		
(3) Vinod Kumar Jain HUF	Yes	AAAHV2404F
(4) Arihant Exports Limited	Yes	AAACA0143P
(5) Accurex Traders Private Limited	Yes	AACCA1330J
(6) Sulabh Plantation & Finance Private Limited	Yes	AACCS2207C
(7) Sind-Wave Finance Services Private Limited	Yes	AAGCS2744C
(8) Prabhat Capial Services Limited	Yes	AACCP6531C
(9) Shubh Exim Limited	Yes	AABCS8094E
(10) Gurukripa Finvest Private Limited	Yes	AAACG4045J
(11) Inder Overseas Private Limited	Yes	AAACI1230K
(12) Nityanand Exports and Consultants Company Limited	Yes	AAACN1386P
(13) MVA Finance Private Limited	Yes	AAACM1452D
(14) The Pradeshiya Industrial And Investment Corporation of UP Ltd.	Yes	AAACT6517A

**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 (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Erstwhile 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.



MANISH JAIN

Transferor and Promoter

Place: New Delhi

Date: 10.02.2022