



PROUD TO BE INDIAN  
PRIVILEGED TO BE GLOBAL

HEG/SECTT/2020

18<sup>th</sup> August, 2020

1	<b>BSE Limited</b> P J Towers Dalal Street MUMBAI - 400 001. <b>Scrip Code : 509631</b>	2	<b>National Stock Exchange of India Limited</b> Exchange Plaza, 5th Floor Plot No.C/1, G Block, Bandra - Kurla Complex Bandra (E), MUMBAI - 400 051. <b>Scrip Code : HEG</b>
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Sub: Intimation pursuant to Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir,

This is to inform you that Mekima Corporation, Member of Promoter Group vide its letter dated 12<sup>th</sup> August, 2020 (received by the Company today i.e. 18<sup>th</sup> August, 2020) has requested for reclassifying them from 'Promoter/Promoter Group' to 'Public Category' under regulation 31A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.

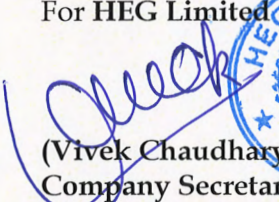
The Company will take all requisite approval in this regard as required by Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.

Please find enclosed a copy of the request letter received in this regard as required by Regulation 31A of the Listing Regulations.

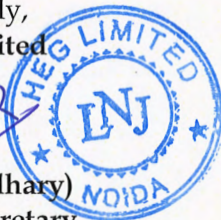
Kindly take the same on your record.

Thanking you,

Yours faithfully,  
For HEG Limited

  
(Vivek Chaudhary)  
Company Secretary  
M.No. A-13263

[heg.investor@lnjbhilwara.com](mailto:heg.investor@lnjbhilwara.com)



## HEG LIMITED

### Corporate Office :

Bhilwara Towers, A-12, Sector-1  
Noida - 201 301 (NCR-Delhi), India  
Tel.: +91-120-4390300 (EPABX)  
Fax: +91-120-4277841  
Website: [www.lnjbhilwara.com](http://www.lnjbhilwara.com)

### Regd. Office :

Mandideep (Near Bhopal) Distt. Raissen - 462046  
(Madhya Pradesh), India  
Tel.: +91-7480-405500, 233524 to 233527  
Fax: +91-7480-233522  
Website: [www.hegltd.com](http://www.hegltd.com)

ISO 9001  
BUREAU VERITAS  
Certification



ISO 14001  
BUREAU VERITAS  
Certification



Corporate Identification No.: L23109MP1972PLC008290

**MEKIMA CORPORATION**  
**c/o Arias Fabrega & Fabrega**  
**PH ARIFA, 9<sup>th</sup> & 10<sup>th</sup> Floors, West Boulevard**  
**Santa Maria Business District**  
**Panama, Republic of Panama**

8

Contact Ken Tay  
Tel Direct +41 41 723 11 56

12 August 2020

VIA EMAIL

The Board of Directors  
HEG Limited  
Bhilwara Towers, A – 12,  
Sector – 1, Noida – 201301  
Uttar Pradesh  
India

LNJ BHILWARA GROUP  
Bhilwara Towers : A-12, Sector-1  
Noida-201301 (U.P.) INDIA  
Ph.: 91-120-4390300, (EPABX)  
Fax.:91-120-4277841

DT. 18/8/2020  
TIME. 12:30  
C/O HEG LTD

Dear Sirs,

Mekima Corporation ("Mekima") currently holds 1,732,389 equity shares of HEG Limited (HEG"). Mekima continues to be classified as a promoter of HEG Limited.

As you are aware Mekima is not involved in management of the Company and in particular, is not privy to any unpublished price sensitive information.

Accordingly, we request that a necessary request be made to the Stock Exchange(s), for allowing modification or reclassification of the shareholding of Mekima Corporation in the Company from the category of promoter to that of a public shareholder. We attach herewith:

- a) Our request letter to HEG for such declassification.
- b) The Undertaking from Outgoing Promoter as is required by the NSE.

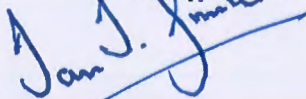
We request that necessary steps be expeditiously initiated in this regard. We remain available to provide any additional information or assistance as may be required.

We request that this matter be an agenda item in the forthcoming general meeting.

In the interim and in keeping with the requirements of HEG Limited - Code of Conduct for Regulating, Monitoring & Reporting Trading by Insiders and Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, we shall seek permission to trade within the trading window as set out by the company.

In this regard we request an appointment with the compliance at the earliest, in the week starting August 17th, 2020. It is Mekima's objective to divest 1,455,207 number of shares.

Kind regards  
For Mekima Corporation



Authorised signatory

Administration address:  
C/o ATTENDUS Trust Company AG  
Bahnhofstrasse 12, P.O. Box  
CH-6302 Zug, Switzerland

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12 August 2020

VIA EMAIL

The Board of Directors  
HEG Limited  
Bhilwara Towers  
A – 12, Sector – 1  
Noida – 201301  
Uttar Pradesh  
India

*[Signature]*  
LNJ BHILWARA GROUP  
Bhilwara Towers : A-12, Sector-1  
Noida-201301 (U.P.) INDIA  
Ph.: 91-120-4390300, (EPABX)  
Fax.:91-120-4277841

DT. 18/8/2020

Time. 12:30

C/O HEG C/O

Dear Sirs,

**Subject: Re-classification of the shareholding of Mekima Corporation in HEG Limited from the category of Promoters to that of Public Shareholders.**

**Reference: Regulation 31A of SEBI (Listing Obligations and Disclosure Requirement's) Regulations, 2015**

Mekima Corporation is a registered shareholder of your company and holds 1,732,389 equity shares of the shareholding of the company. These shares are currently being treated as part of the Promoter and Promoter Group of shares.

We request that the shareholding of Mekima Corporation be re-classified from the category of Promoter of HEG Limited (the "Company") to that of public shareholder. We request, that all steps as are required in law be taken towards such re-classification.

We would like to bring to your notice the following facts and reasons why Mekima Corporation should be re-classified from the category of promoter of HEG Limited:

- (i) Mekima Corporation holds less than 5% of the shares of HEG Limited.
- (ii) Mekima Corporation or its promoters have not ever been associated as a managerial person or director of HEG Limited.
- (iii) Mekima Corporation and its promoters have no involvement in the operations of the company nor connected with the company.
- (iv) Mekima Corporation and its promoters do not exercise any direct or indirect control, over the affairs of the company.

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**Panama, Republic of Panama**

- (v) Mekima Corporation and its promoters do not enjoy any special rights through formal or informal arrangements with the Company or promoters or any person in the promoter group.
- (vi) Mekima Corporation and its promoters are never privy to price sensitive information about HEG.
- (vii) Mekima Corporation and its promoters run business independent and distinct from HEG Limited.

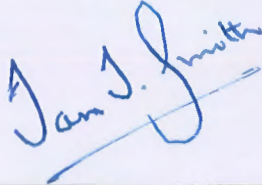
In light of the above we request that necessary request be made to the stock exchanges, for allowing modification or reclassification of the shareholding of Mekima Corporation in the Company from the category of promoter to that of a public shareholder.

We attach herewith the Undertaking from Outgoing Promoter as is required by the NSE.

We once again request that necessary steps be expeditiously taken in this regard. We remain available to provide any additional information or assistance as may be required.

Yours faithfully,

For **Mekima Corporation**



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Authorised signatory

**MEKIMA CORPORATION**  
**c/o Arias Fabrega & Fabrega**  
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**Santa Maria Business District**  
**Panama, Republic of Panama**

Contact Ken Tay  
Tel Direct+41 41 723 11 56

12 August 2020

VIA EMAIL

The Head  
National Stock Exchange of India Limited  
India

Dear Sirs,

**Sub: Application w.r.t Reclassification under Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

In connection with application for reclassification, we hereby confirm and certify that:

1. We (Mekima Corporation) together:
  - a) do not hold more than ten percent of the total voting rights in the company
  - b) do not exercise control over the affairs of the company, directly or indirectly
  - c) do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements
  - d) are not being represented on the board of directors (including not having a nominee director) of the Company
  - e) do not act as a key managerial person of the Company
  - f) are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g) are not fugitive economic offender
  
2. There is no pending regulatory action against us.
  
3. We shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, we shall be reclassified as promoter/person belonging to the promoter group of the company.

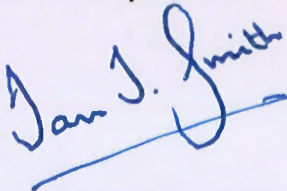
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4. We shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, we shall be reclassified as promoter/person belonging to a promoter group of the company.

Yours faithfully,

For and behalf of  
**Mekima Corporation**



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Authorised signatory  
IAN TREVOR SMITH

Administrators' Email: [ken.tay@attendus.com](mailto:ken.tay@attendus.com)  
Contact number: +41 41 723 11 56