HEMANT M. SHAH Akruti 23- F, Doongersey Road, Walkeshwar, Mumbai 400 006

March 18, 2020

To,

Dear Sir,

Pursuant to Regulation 31 (2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, please find annexed disclosure thereto in the prescribed format.

I request you to kindly take the same on your records.

Thanking you,

Yours faithfully,

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Hemant M. Shah

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 REGULATIONS 31 (1) AND 31 (2) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011

Date of Reporting Name of the Promotor or PAC on whose shares enclimbrance has been created / released / invoked	and linuslast	Mar	March 18, 2020	March 18, 2020					
on created / relea	and linunlind								
of of calca / Torca	Sed / IIIVOKed	HEN	HEMANT M. SHAH - PROMOTER	ROMOTER					
		RE1	OCATION OF PLE	DGE CREATED ON SHARES FOR LOA	AN AVAILED BY	HUBTOWN LIMITE			
Promoter holding	Details of eve	ents pertaining to	encumbrance						holding of
encumbered				3				(creation [(2)+(3)) (creation [(2)+(3))	shares 3) / 11 /
								invocation [(1)-(3)]	3)]
2				3				4	
-				Reasons for encumbrance (**)		-	Name of the entity in	of .	% of total
		ion	encumbrance	Reasons for encumbrance ()	res		whose favour shares	res	% or total share
capital	release /	invocation of	non-disposal	•			(***)		capitai
	Invocation)	encumprance	others)					1	
140000 0.19	N.A.	N.A.	N.A.		0	N.A.	N.A.	140000	0.19
4978450 6.84	N.A.	N.A.	N.A.		0.	N.A.	N.A.	4978450	6.84
5470000 7.52	Release	16.03.2020	Pledge	created as collat	50000	0.069	SKS FINCAP	5420000	7.45
				ban availed			PRIVATE LIMITED		
7525000 10.35	N.A.	N.A.	N.A.		0	N.A.	N.A.	7525000	10.35
1692000 2.33	N.A.	N.A.	N.A.		0	N.A.	N.A.	1692000	2.33
3925000 5.40	N.A.	N.A.	N.A.		0	N.A.	N.A.	3925000	5.40
2720956 3.74	N.A.	N.A.	N.A.		0	N.A.	N.A.	2720956	3.74
3032000 4.17	N.A.	N.A.	N.A.		0	N.A.	N.A.	3032000	4.17
1261950 - 1.73	N.A.	N.A.	N.A.		0	N.A.	N.A.	1261950	1.73
1930119 2.65	N.A.	N.A.	N.A.		0	N.A.	N.A.	1930119	2.65
	N.A.	N.A.	N.A.		0	N.A.	N.A.	3500000	4.81
0	N.A.	N.A.	N.A.		0	N.A.	N.A.	0	0
36175475 49.74					50000	0.069		36125475	49.67
	Promoter already encumbered holding already encumbered 2 2 No. of share shares shares % of total share capital 140000 0.19 140000 7.52 5470000 7.52 7525000 10.35 1692000 2.33 3925000 3.74 2720956 3.74 1261950 1.73 1261950 4.81 0 0 0 0 0 0	encumbered Details of ewe encumbered Share event capital capital release / invocation) 0 0.19 N.A. 0 0.19 N.A. 0 10.35 N.A. 0 10.35 N.A. 0 2.33 N.A. 0 4.17 N.A. 0 4.17 N.A. 0 4.81 N.A. 19 2.65 N.A. 19 2.65 N.A. 19 2.65 N.A. 19 2.65 N.A.	wents pertainin ereation encumbran N.A. N.A. N.A. N.A. N.A. N.A. N.A. N.A	wents pertainin ereation encumbran N.A. N.A. N.A. N.A. N.A. N.A. N.A. N.A	wents pertainin ereation encumbran N.A. N.A. N.A. N.A. N.A. N.A. N.A. N.A	release encumbrand N.A. N.A. N.A. N.A. N.A. N.A. N.A. N.A	release encumbrand N.A. N.A. N.A. N.A. N.A. N.A. N.A. N.A	REVOCATION OF PLEDGE CREATED ON SHARES FOR LOAN AVAILED BY HUBTOWN LIMITED 3 3 Type of requiremence (*) No. of % of total share release / (piedge / lien / invocation of inch-disposal others) NA. NA. NA. O NA. NA. NA. NA. O NA. O NA. O NA. NA. NA. NA. O NA. O NA. O NA. NA. NA. NA. O NA. O NA. O NA. O NA.	REVOCATION OF PLEDGE CREATED ON SHARES FOR LOAN AVAILED BY HUBTOWN LIMITED Past continuence Past continuence

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	No. of shares	% of total share	No. of	% of	Type of	Date of	Type of	Reasons for encumbrance	No. of	% of total	Name of the entity	No. of	% of total
		capital (*)	es	al	event (creation /	creation / release /	encumbrance (pledge / lien /		shares	share capital	in whose tavour shares	snares	capital
				capital	release /	invocation of	non-disposal				encumbered		
					invocation	encumbrance	undertaking / others)						
	38264957	52.61	36175475	49.74					50000	0.069		36125475	49.67
Ukay Valves and Founders Private Limited	300000	0.41	0.00	0.00	N.A.	N.A.	N.A.		0	N.A.	N.A.	0.00	0.00
Vishwajeet Consultancy Private Limited	300000	0.41	0.00	0.00	N.A.	N.A.	N.A.		0	N.A.	N.A.	0.00	0.00
	38864957	53.43	36175475	49.74					00000	0.069		30123473	43.07
Signature of the Authorised Signatory	f the Authorised Signatory	2											
Hemant M. Shah													
Place : Mumbai											•		
Date : March 18, 2020													
			and the second se										

(*) – The names of all the promoters, their shareholding in the target company and their pledged shareholding as on the reporting date should appear in the table irrespective of whether they are reporting on the date of event or not; (**) - for example, for the purpose of collateral for loans taken by the company, personal borrowing, third party pledge, etc.

(***) - This would include name of both the lender and the trustee who may hold shares directly or on behalf of the lender.