

SUBASRI REALTY PRIVATE LIMITED

86, PERIYAR E.V.R. HIGH ROAD, CHENNAI - 600 007.

Tel Nos : 044-6623 9999. FAX : 2661 2258.

GSTIN : 33AAICS5415L1Z7

CIN U45201TN2004PTC054407

Ref :

Date :

May 17, 2023

To,
The Corporate Relations Department
The Bombay Stock Exchange
2ndFloor, Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai 400 001

Dear Sir,

Subject: Discrepancy in disclosure under Regulation 10 (5) of SEBI (SAST) Regulations 2011 - Target company - Aruna Hotels Ltd (500016)

This is with reference to the captioned subject and your email dated 3rd May, 2023 and 11th May, 2023 wherein we were asked to rectify and submit the documents to include the acquisition date.

The said disclosures were sent to you vide email and following Speed Post Receipt Nos. (Copy enclosed). However, we are not able to locate the acknowledgement.

1. No.CTO28932120IN dated 09/11/2015
2. No.CTO28561369IN dated: 09/11/2015
3. Our email to BSE dated 21/11/2018 sent to corp.relations@bseindia.com from ceo@subasri.net

As per the Internal Committee (IC) meeting of SEBI held on 18th January 2023, we were advised to submit the disclosures again, which we have done on 24th January, 2023.

Herewith find enclosed the captioned disclosures along with the acquisition date.

You are kindly requested to acknowledge the said disclosures and oblige.

Thanking you
Yours faithfully,
For Subasri Realty Private Limited



Paulraj Jeyapandy
Director
DIN: 00343328



SUBASRI REALTY PRIVATE LIMITED

86, PERIYAR E.V.R. HIGH ROAD, CHENNAI - 600 007.

Tel Nos : 6527 5499, 2661 8661. FAX : 2661 2258.

CIN U45201TN2004PTC054407

Ref :

Date :

09.11.2015

To

Bombay Stock Exchange
P J Tower
Dalal Street
Mumbai 400 001

Dear Sir,

Sub: Intimation to Stock Exchange in respect of acquisition under Regulation 10 (1) (a) of SEBI Regulations.

Please find attached, herewith the Requisite Disclosures under Regulation 10(5) – Intimation to Stock Exchange in respect of acquisition under Regulation 10 (1) (a) of SEBI (Substantial Acquisition of Shares and Take overs) Regulations, 2011

Kindly acknowledge the receipt.

Thanking you,

For Subasri Realty Private limited



Authorised Signatory

Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1	Name of the Target Company (TC)	ARUNA HOTELS LIMITED
2	Name of the acquirer(s)	Subasri Realty Private limited
3	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes . Promoter
4	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	M.Sivaram
	b. Proposed date of acquisition	Any time After 4 workings Days from the this date of Intimation
	Date of Acquisition	13.11.2015
	c. Number of shares to be acquired from each person mentioned in 4(a) above	50,000
	d.Total shares to be acquired as % of share capital of TC	0.55%
	e.Price at which shares are proposed to be acquired	As Per CLB order
	f.Rationale, if any, for the proposed transfer	Comprise between the Promoters was arrived as per the CLB order through MOC.
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Regulations 10(1)(a)(ii) of the SEBI SAST Regulation
6	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period	Trading suspended.
7	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8	Price as per CLB order

8	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	As per CLB order			
9	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)	Declaration obtained as per Chapter V of the SEBI SAST regulations			
10	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with	All the conditions specified under Regulation 10(1)(a) of the SEBI SAST regulations with respect to exemptions has been duly complied with			
11	Shareholding details	Before the Proposed transaction		After Proposed Transaction	
		No.Of Shares/Voting rights	%w.r.t Total Share Capital of TC	No.Of Shares/Voting rights	%w.r.t Total Share Capital of TC
	a.Acquirer and PAC	13,20,681	14.67 %	1370681	15.23%
	b.Sellers	4,94,640	5.49%	4,44,640	4.94%

Name of the Acquirer: Subasri Realty Private Limited

Date: 9.11.2015

Place: Chennai



Authorized Signatory

भारतीय डाक विभाग
DEPARTMENT OF POSTS, INDIA

ANNEXURE
DESPATCH SLIP

सुबरी सेन



10/10/15



9/11/2015

CTO2893212014

Subari Realty P.L. Ltd

NO:86/1051 Periyar

EVR High Road

Chennai-600 007

BSE

PJ Tower

Dalal street

Mumbai-400 001



SUBASRI REALTY PRIVATE LIMITED

86, PERIYAR E.V.R. HIGH ROAD, CHENNAI - 600 007.

Tel Nos : 6527 5499, 2661 8661. FAX : 2661 2258.

CIN U45201TN2004PTC054407

Ref :

Date :

13.11.2015

To

Bombay Stock Exchange
P J Tower
Dalal Street
Mumbai 400 001

Dear Sir,

Sub: Intimation to Stock Exchange in respect of acquisition under Regulation 10 (1) (a) of SEBI Regulations.

Please find attached, herewith the Requisite Disclosures under Regulation 10(5) – Intimation to Stock Exchange in respect of acquisition under Regulation 10 (1) (a) of SEBI (Substantial Acquisition of Shares and Take overs) Regulations, 2011

Kindly acknowledge the receipt.

Thanking you,

For Subasri Realty Private limited



Authorised Signatory

Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1	Name of the Target Company (TC)	ARUNA HOTELS LIMITED
2	Name of the acquirer(s)	Subasri Realty Private limited
3	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes . Promoter
4	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	M.Sivaram
	b. Proposed date of acquisition	Any time After 4 workings Days from the this date of Intimation
	Date of Acquisition	18.11.2015
	c. Number of shares to be acquired from each person mentioned in 4(a) above	93,442
	d.Total shares to be acquired as % of share capital of TC	1.04%
	e.Price at which shares are proposed to be acquired	As per CLB order.
	f.Rationale, if any, for the proposed transfer	Comprise between the Promoters was arrived as per the CLB order through MOC.
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Regulations 10(1)(a)(ii) of the SEBI SAST Regulation
6	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period	Trading suspended.
7	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8	AS per CLB order

8	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	As per CLB order			
9	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)	Declaration obtained as per Chapter V of the SEBI SAST regulations			
10	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with	All the conditions specified under Regulation 10(1)(a) of the SEBI SAST regulations with respect to exemptions has been duly complied with			
11	Shareholding details	Before the Proposed transaction		After Proposed Transaction	
		No.of Shares/Voting rights	%w.r.t Total Share Capital of TC	No.of Shares/Voting rights	%w.r.t Total Share Capital of TC
	a.Acquirer and PAC	13,70,681	15.263%	14,64,123	16.27%
	b.Sellers	4,44,640	4.94%	3,51,198	3.90%

Name of the Acquirer: Subasri Realty Private Limited

Date:13.11.2015

Place : Chennai



Authorized Signatory

भारतीय डाक विभाग
DEPARTMENT OF POSTS, INDIA
ANNEXURE
DISPATCH SLIP

भारतीय डाक



India Post



9/11/2015

CTO28561369N

Gay Travel Pvt Ltd

No: 61

Nungambakkam High Road

Chennai-600 007

BSE

P.J. Tower

Dalal street

Mumbai-400 001



SUBASRI REALTY PRIVATE LIMITED

86, PERIYAR E.V.R. HIGH ROAD, CHENNAI - 600 007.

Tel Nos : 6527 5499, 6623 9999, 2661 8661. Fax : 2661 2258

GSTIN : 33AAICS5415L1Z7

CIN U45201TN2004PTC054407

Ref :

Date :

November 21, 2018

To,
Corporate Relations Department,
BSE Limited,
25th Floor, P. J. Towers,
Dalal Street, Fort,
Mumbai - 400001,
Maharashtra

Dear Sir/Madam,

Sub: Disclosure filed by Subasri Realty Pvt Ltd under Regulations 10(5) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 with respect to its proposed acquisition of equity shares of Aruna Hotels Limited (Scrip Code: 500016)

With regard to captioned subject, please find enclosed herewith the disclosure required to be given under Regulations 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

Kindly take note of the same.

Thanking you,

For Subasri realty Private limited



Authorised Signatory

Encl. As Above.

Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	ARUNA HOTELS LIMITED													
2.	Name of the acquirer(s)	SUBASRI REALTY PRIVATE LIMITED													
3.	Whether the acquirer(s) is/are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes													
4.	Details of proposed acquisition														
	a. Name of the person(s) from whom shares are to be acquired	1.Karthik P Sivaram 2.Raghavan Sivaram 3.Sathya Sivaram 4.Swarna													
	b. Proposed date of acquisition	On or after 29.11.2018													
	Date of Acquisition	14,858 sh – Date of Acquisition: 24.12.2018 2,06,558 sh- Date of Acquisition: 08.01.2019													
	c. Number of shares to be acquired from each person mentioned in 4(a) above	<table border="1"> <thead> <tr> <th>Name of the Transferor</th> <th>No. of Shares to be Acquired</th> </tr> </thead> <tbody> <tr> <td>Karthik P Sivaram</td> <td>76,231</td> </tr> <tr> <td>Raghavan Sivaram</td> <td>68,558</td> </tr> <tr> <td>Sathya Sivaram</td> <td>61,769</td> </tr> <tr> <td>Swarna</td> <td>14,858</td> </tr> <tr> <td>Total</td> <td>2,21,416</td> </tr> </tbody> </table>		Name of the Transferor	No. of Shares to be Acquired	Karthik P Sivaram	76,231	Raghavan Sivaram	68,558	Sathya Sivaram	61,769	Swarna	14,858	Total	2,21,416
Name of the Transferor	No. of Shares to be Acquired														
Karthik P Sivaram	76,231														
Raghavan Sivaram	68,558														
Sathya Sivaram	61,769														
Swarna	14,858														
Total	2,21,416														
	d. Total shares to be acquired as % of share capital of TC	2.46%													
	e. Price at which shares are proposed to be acquired	As per CLB, Chennai Order dated March 2, 2015													
	f. Rationale, if any, for the proposed transfer	Compromise between the promoters was arrived at as pursuant to the Memorandum of Compromise dated February 12, 2015 which was taken on record by the Hon'ble CLB, Chennai Bench vide its order dated March 2, 2015													

5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Regulation 10(1)(a)(ii)			
6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.	-			
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Rs. 247.39			
8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	The Acquirer confirms that the acquisition price would not be higher by more than 25% of the price computed in point 7 above.			
9.	<p>i. Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)</p> <p>ii. The aforesaid disclosures made during previous 3 years prior to the date of proposed acquisition to be furnished.</p>	<p>Yes</p> <p>Yes, copies enclosed as Annexure.</p>			
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	The Acquirer confirms that that all the conditions specified under Regulation 10(1)(a) with respect to exemption have been complied with			
11.	Shareholding details	Before the proposed transaction		After the proposed transaction	
		No. of shares	w.r.t total diluted share capital of TC	No. of shares	% w.r.t total diluted share capital of TC
a.	Acquirer(s) and PACs (other than sellers) (*)				
	Subasri Realty Pvt Ltd	14,64,123	16.27	16,85,539	18.73
	Gay Travels Private Ltd	591506	6.57	591506	6.57
	Yessir Holdings and Investments Pvt Ltd	372412	4.14	372412	4.14
	Sovereign Media Marketing Pvt Limited	195718	2.17	195718	2.17
	Sri Devi Agencies Pvt Ltd	29880	0.33	29880	0.33
	Rani Printers Pvt Ltd	61093	0.68	61093	0.68

		Maruthai Pillai P	30390	0.34	30390	0.34
		Rukmani Sivaram	25624	0.28	25624	0.28
		Augustin D	19200	0.21	19200	0.21
		Geetha Periasamy	17180	0.19	17180	0.19
		Anita Kumaran	15000	0.17	15000	0.17
		Mala Jayaram	14940	0.17	14940	0.17
		Arun Pillai M	11844	0.13	11844	0.13
		Chandrakant	11683	0.13	11683	0.13
		Sivakami Subbiah	10000	0.11	10000	0.11
		Jayanthi Natarajan	12200	0.14	12200	0.14
		Vijayalakshmi Chandramohan	7770	0.09	7770	0.09
		Jayanthi S	6514	0.07	6514	0.07
		Yamini Subbiah	6000	0.07	6000	0.07
		Senthilnathan M	5530	0.06	5530	0.06
		Sivaram M	6105	0.07	6105	0.07
		Sivabagyam M	3700	0.04	3700	0.04
		Chandra Mohan P	3200	0.04	3200	0.04
		Ravichandran C L	802	0.01	802	0.01
		Ganesan M	1900	0.02	1900	0.02
		Chithan V	10050	0.11	10050	0.11
		Chandramohan R	19200	0.21	19200	0.21
		Subbiah T N	42300	0.47	42300	0.47
		Adityan B S	309888	3.44	309888	3.44
		Kamal Babbar	1216500	13.52	1216500	13.52
		Total	4601145	51.13	4743668	52.71
	b.	Seller(s)				
		1. Karthik P Sivaram	78893	0.88	2662	0.03
		2. Raghavan Sivaram	68558	0.76	Nil	Nil
		3. Sathya Sivaram	61769	0.69	Nil	Nil
		4. Swarna	14858	0.17	Nil	Nil
		Total	2,24,078	2.49	2662	0.03

Note:

- (*) Shareholding of each entity may be shown separately and then collectively in a group.
- The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.

For **SUBASRI REALTY PRIVATE LIMITED**



Director

Date: 21.11.2018

Place: Chennai

Gmail

aruna hotels chennai <directorsaruna@gmail.com>

Disclosure under Regulations 10(5) of SEBI (Sast) Regulations 2011

21 November 2018 at 15:41

CEO <ceo@subashirealty.com>
To: "corp.relations@bseindia.com" <corp.relations@bseindia.com>
Cc: "directorsaruna@gmail.com" <directorsaruna@gmail.com>

Dear Sir/Madam,

Subj: Disclosure filed by Subashi Realty Pvt Ltd under Regulations 10(5) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 with respect to its proposed acquisition of equity shares of Aruna Hotels Limited (Scrip Code: 500016)

With regard to captioned subject, please find enclosed herewith the disclosure required to be given under Regulations 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended from time to time.

Kindly take note of the same.

Thanking you,