

Date: 06-01-2023

To,  
Bombay Stock Exchange Limited  
Phiroze Jeejeebhoy Towers,  
25th Floor, Dalal Street, Fort,  
Mumbai-400001

**Scrip Code: 504028**

**Subject: Intimation to exchange as per Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and Regulation 7 (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015.**

Respected Sir/Madam,

With reference to the above, this is to bring to your kind notice that the Company has received disclosure from the following shareholders regarding disposal of their shares:

S No.	Name Of Shareholder	No. Of Shares Held	Percentage (%)	No. Of Shares Disposed	Date Of Disposal	Date Of Intimation To Company
1.	Govind Kumar Saraf	2,17,654	0.84	2,17,654	02-01-2023	04-01-2023
2.	Ranjana Saraf	98,251	0.38	98,251	02-01-2023	04-01-2023
3.	Vitro Commodities Pvt. Ltd.	16,97,232	6.53	16,97,232	03-01-2023	04-01-2023
4.	Govind Kumar Saraf HUF	40,895	0.16	40,895	06-01-2023	06-01-2023
5.	Sagar Consolidated Holdings Pvt. Ltd.	4,62,649	1.78	4,62,649	06-01-2023	06-01-2023

The Company is required to intimate the exchange within 2 trading days of receipt of the disclosure from the shareholders. Please find attached the disclosures as received from the above shareholders for your perusal.

Please take the above on records and oblige.

For **GEE LIMITED**

SANWARMAL AGARWAL  
Managing Director  
DIN: 01007594



# GOVIND KUMAR SARAF

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA

To,  
GEE Limited  
Plot No E-1, Road No. 7,  
Wagle Industrial Estate Thane  
Maharashtra - 400 604

To,  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai - 400 001

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

Dear Sir,

With reference to the captioned subject, kindly find attached herewith Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge the receipt of the same.

Thanks & Regards

  
Govind Kumar Saraf

Place: Kolkata

Date: 02.01.2023

# GOVIND KUMAR SARAF

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA

## Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	GEE Limited		
Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the Acquirer	Govind Kumar Saraf (Self)		
Whether the acquirer belongs to Promoter / Promoter Group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC(**)
<b>Before the acquisition under consideration, holding of:</b>			
a) Shares carrying voting rights	2,17,654	0.84	NA
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NA	NA	NA
c) Voting rights (VR) otherwise than by shares	NA	NA	NA
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	NA	NA	NA
e) Total (a+b+c+d)	2,17,654	0.84	NA
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/sold	2,17,654	0.84	NA
b) VRs acquired /sold otherwise than by shares	NA	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	NA	NA	NA
d) Shares encumbered / invoked/released by the acquirer	NA	NA	NA
e) Total (a+b+c+/-d)	2,17,654	0.84	NA




# GOVIND KUMAR SARAF

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA

<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights	NA	NA	NA
b) Shares encumbered with the acquirer	NA	NA	NA
c) VRs otherwise than by shares	NA	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	NA	NA	NA
e) Total (a+b+c+d)	NA	NA	NA
Mode of acquisition / sale (e.g. open market / <del>off-market</del> / public issue / rights issue / preferential allotment / inter-se transfer etc.).	Open Market		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	02.01.2023		
Equity share capital / total voting capital of the TC before the said acquisition / sale	25,988,466 Equity Shares of Rupees 2/- each		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	25,988,466 Equity Shares of Rupees 2/- each		
Total diluted share/voting capital of the TC after the said acquisition	25,988,466 Equity Shares of Rupees 2/- each		

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the StockExchange under 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.

  
**Govind Kumar Saraf**  
**Signature of the Acquirer / Seller / Authorized Signatory**  
**Place: Kolkata**  
**Date: 02.01.2023**

**FORM C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015**

[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: **GEE Limited**  
 ISIN of the company: **INE064H01021**

**Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Director s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	Value	Transaction Type (Buy/Sale/Pledge / Revoke / Invoke )	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Date of allotment advice/ acquisition of shares/ sale of shares specify	Date of intimatio n to company	Mode of acquisition / disposal (on market/public / rights/ preferential offer / off market/ Inter-setransfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding											
Govind Kumar Saraf PAN: ALBPS2505A ADDRESS: 14, Ballygunge Park Road, Park Tower Flat No. 042, Kolkata – 700 019 CONTACT: 9831007020	Promoter	Equity Shares	2,17,654 0.84%	Equity Shares	2,17,654	Equity Shares	14468114.34	Sale	Equity Shares	N I L	02.01.2023	04.01.2023	Open Market	BSE Limited

*Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.*

**Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2). Not Applicable**

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	

*Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.*

 Name & Signature: Govind Kumar Saraf

Designation: Individual

Date: 04.01.2023

Place: Kolkata

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# RANJANA SARAF

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA

<b>To,</b> <b>GEE Limited</b> <b>Plot No E-1, Road No. 7,</b> <b>Wagle Industrial Estate Thane</b> <b>Maharashtra - 400 604</b>	<b>To,</b> <b>BSE Limited</b> <b>Phiroze Jeejeebhoy Towers</b> <b>Dalal Street, Mumbai - 400 001</b>
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**Subject: Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Dear Sir,**

With reference to the captioned subject, kindly find attached herewith Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge the receipt of the same.

Thanks & Regards



**Ranjana Saraf**

**Place: Kolkata**

**Date: 02.01.2023**



# RANJANA SARAF

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA

## Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	GEE Limited		
Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the Acquirer	Ranjana Saraf (Self)		
Whether the acquirer belongs to Promoter / Promoter Group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC(**)
<b>Before the acquisition under consideration, holding of :</b>			
a) Shares carrying voting rights	98,251	0.38	NA
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NA	NA	NA
c) Voting rights (VR) otherwise than by shares	NA	NA	NA
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	NA	NA	NA
e) Total (a+b+c+d)	98,251	0.38	NA
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/sold	98,251	0.38	NA
b) VRs acquired /sold otherwise than by shares	NA	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	NA	NA	NA
d) Shares encumbered / invoked/released by the acquirer	NA	NA	NA
e) Total (a+b+c+/-d)	98,251	0.38	NA

*R. Saraf*



# RANJANA SARAF

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA

<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights	NA	NA	NA
b) Shares encumbered with the acquirer	NA	NA	NA
c) VRs otherwise than by shares	NA	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	NA	NA	NA
e) Total (a+b+c+d)	NA	NA	NA
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.).	Open Market		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	02.01.2023		
Equity share capital / total voting capital of the TC before the said acquisition / sale	25,988,466 Equity Shares of Rupees 2/- each		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	25,988,466 Equity Shares of Rupees 2/- each		
Total diluted share/voting capital of the TC after the said acquisition	25,988,466 Equity Shares of Rupees 2/- each		

(\* ) Total share capital/ voting capital to be taken as per the latest filing done by the company to the StockExchange under 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.



**Ranjana Saraf**  
**Signature of the Acquirer / Seller / Authorized Signatory**  
**Place: Kolkata**  
**Date: 02.01.2023**

**FORM C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]**

Name of the company: GEE Limited  
ISIN of the company: INE064H01021

**Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)**

Name, PAN, GMPIN, & address with contact nos.	Category of Person (Promoters/ KMP / Director s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. of shares	Value	Transaction Type (Buy/Sale/Pledge / Revoke / Invoice )	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. of shares	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	Date of allotment advice/ acquisition of shares/ sale of shares specify	Date of intimation to company	Mode of acquisition / disposal (on market/public / rights/ preferential offer / off market/ Inter-settransfer, ESOPs etc.)	Exchange on which the trade was executed
		No. and % of shareholding	No. and % of shareholding											
Ranjan Saraf PAN: ALSPS2203A ADDRESS: 14, Ballygunge Park Road, Park Tower Flat No. 042, Kolkata – 700 019 CONTACT: 9831407021	Promoter	98,251 0.38%	98,251	Equity Shares	98,251	6229535.88	Sale	Equity Shares	98,251	Equity Shares	02.01.2023	04.01.2023	Open Market	BSE Limited

*Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.*

Page 1 of 7  
*R. Saraf*

**Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2). Not Applicable**

Type of contract	Contract specifications	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	

*Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.*



Name & Signature: Ranjana Saraf

Designation: Individual

Date: 04.01.2023

Place: Kolkata

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# VITRO COMMODITIES PRIVATE LIMITED

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA

To,  
GEE Limited  
Plot No E-1, Road No. 7,  
Wagle Industrial Estate Thane  
Maharashtra - 400 604

To,  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai - 400 001

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

Dear Sir,

With reference to the captioned subject, kindly find attached herewith Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge the receipt of the same.

Thanks & Regards

For Vitro Commodities Private Limited  
VITRO COMMODITIES PVT LTD.

\_\_\_\_\_  
Govind Kumar Saraf  
(Director - DIN: 00718228)

Director

Place: Kolkata  
Date: 03.01.2023

# VITRO COMMODITIES PRIVATE LIMITED

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA – 700 019, WEST BENGAL, INDIA

## Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	GEE Limited		
Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the Acquirer	Vitro Commodities Private Limited		
Whether the acquirer belongs to Promoter / Promoter Group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC(**)
<b>Before the acquisition under consideration, holding of:</b>			
a) Shares carrying voting rights	16,97,232	6.53	NA
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NA	NA	NA
c) Voting rights (VR) otherwise than by shares	NA	NA	NA
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	NA	NA	NA
e) Total (a+b+c+d)	16,97,232	6.53	NA
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/sold	16,97,232	6.53	NA
b) VRs acquired /sold otherwise than by shares	NA	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	NA	NA	NA
d) Shares encumbered / invoked/released by the acquirer	NA	NA	NA
e) Total (a+b+c+/-d)	16,97,232	6.53	NA

VITRO COMMODITIES PVT LTD.

Director



# VITRO COMMODITIES PRIVATE LIMITED

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA

<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights	NA	NA	NA
b) Shares encumbered with the acquirer	NA	NA	NA
c) VRs otherwise than by shares	NA	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	NA	NA	NA
e) Total (a+b+c+d)	NA	NA	NA
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.).	Open Market		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	03.01.2023		
Equity share capital / total voting capital of the TC before the said acquisition / sale	25,988,466 Equity Shares of Rupees 2/- each		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	25,988,466 Equity Shares of Rupees 2/- each		
Total diluted share/voting capital of the TC after the said acquisition	25,988,466 Equity Shares of Rupees 2/- each		

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the StockExchange under 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.

**For Vitro Commodities Private Limited**

VITRO COMMODITIES PVT LTD.

**Govind Kumar Saraf (Director - DIN: 00718228)**

**Signature of the Acquirer / Seller / Authorized Signatory**

**Place: Kolkata**

**Date: 03.01.2023**



**FORM C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]**

Name of the company: GEE Limited  
 ISIN of the company: INE064H01021

**Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Director s/ immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		Securities held post acquisition/disposal		Date of intimation to company	Mode of acquisition / disposal (on market/public rights/ preferential offer / off market/ Inter-settransfer, ESOPs etc.)	Exchange on which the trade was executed		
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge / Revoke / Invoke )				Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding
Vitro Commodities Private Limited PAN: AAACV9364R ADDRESS: 14, Ballygunge Park Road, Park Tower Flat No. 042, Kolkata – 700 019 CONTACT: 9831007020	Promoter	Equity Shares	16,97,232 6.53%	Equity Shares	16,97,232	Sale	Equity Shares	N I L	03.01.2023	03.01.2023	Open Market	BSE Limited

*Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.*

Page 1 of 7  
**VITRO COMMODITIES PVT LTD.**  
  
**Director**

**Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2). Not Applicable**

Type of contract	Contract specifications	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	

*Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.*

**VITRO COMMODITIES PVT LTD.**

Name & Signature: For Vitro Commodities Private Limited - Govind Kumar Saraf  
Director

Designation: Director

Date: 04.01.2023

Place: Kolkata

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# GOVIND KUMAR SARAF HUF

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA  
E-MAIL ID: sarafgk@hotmail.com

To, GEE Limited Plot No. E-1, Road No. 7, Wagle Industrial Estate Thane, Maharashtra - 400 604, India	To, BSE Limited Phiroze Jeejeebhoy Towers Dalal Street, Mumbai - 400 001 Maharashtra, India
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**Subject: Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir,

With reference to the captioned subject, kindly find attached herewith Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge the receipt of the same.

Thanks & Regards,

For Govind Kumar Saraf HUF

GOVIND KUMAR SARAF HUF



KARTA

Govind Kumar Saraf (Karta)

Place: Kolkata

Date: 06.01.2023



# GOVIND KUMAR SARAF HUF

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA  
E-MAIL ID: sarafgk@hotmail.com

## Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	GEE Limited		
Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the Acquirer	Govind Kumar Saraf HUF		
Whether the acquirer belongs to Promoter / Promoter Group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC(**)
<b>Before the acquisition under consideration, holding of:</b>			
a) Shares carrying voting rights	40,895	0.16	NA
b) Shares in the nature of encumbrance (pledge / lien / non-disposal undertaking / others)	NA	NA	NA
c) Voting rights (VR) otherwise than by shares	NA	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)	NA	NA	NA
e) Total (a+b+c+d)	40,895	0.16	NA
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/sold	40,895	0.16	NA
b) VRs acquired / sold otherwise than by shares	NA	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	NA	NA	NA
d) Shares encumbered / invoked / released by the acquirer	NA	NA	NA
e) Total (a+b+c+/-d)	40,895	0.16	NA

GOVIND KUMAR SARAF HUF

KARTI

# GOVIND KUMAR SARAF HUF

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA  
E-MAIL ID: sarafgk@hotmail.com

<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights	NA	NA	NA
b) Shares encumbered with the acquirer	NA	NA	NA
c) VRs otherwise than by shares	NA	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	NA	NA	NA
e) Total (a+b+c+d)	NA	NA	NA
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.).	Open Market		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	06.01.2023		
Equity share capital / total voting capital of the TC before the said acquisition / sale	25,988,466 Equity Shares of Rupees 2/- each		
Equity share capital / total voting capital of the TC after the said acquisition / sale	25,988,466 Equity Shares of Rupees 2/- each		
Total diluted share / voting capital of the TC after the said acquisition	25,988,466 Equity Shares of Rupees 2/- each		

(\*) Total share capital / voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 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.

For Govind Kumar Saraf HUF

GOVIND KUMAR SARAF (HUF)



KARTA

Govind Kumar Saraf (Karta)

Signature of the Acquirer / Seller / Authorized Signatory

Place: Kolkata

Date: 06.01.2023



**FORM C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: GEE Limited  
ISIN of the company: INE064H01021

**Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other suchpersons as mentioned in Regulation 6(2)**

Name, PAN, GEN/DEN, & Address with Contact No.	Category of Person (Promoters / KMP / Directors / immediate relative to / others etc.)	Securities held prior to acquisition / disposal		Securities acquired / Disposed		Securities held post acquisition / disposal		Date of Allotment advice / Acquisition of shares / Sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfers, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No. Value	Transaction Type (Buy / Sale / Pledge/ Revoke /Invoke )	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	From			
Govind Kumar Saraf HUF PAN: AABHG3271J ADDRESS: 14, Ballygunge Park Road, Park Tower Flat No. 042, Kolkata – 700 019 CONTACT: 9330207020	Promoter	Equity Shares	40,895 0.16%	Equity Shares	40,895 27,06,692.83	Sale	Equity Shares	NIL	06.01.2023	06.01.2023	Open Market	BSE Limited

*Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.*

GOVIND KUMAR SARAF (HUF.)

**KARTA**



**Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and others such persons as mentioned in Regulation 6(2). Not Applicable**

Type of contract	Trading in derivatives (Specify type of contract, Futures or Options etc)					Exchange on which the trade was executed
	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	

*Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.*

**GOVIND KUMAR SARAF HUF**  
  
**KARTA**

Name & Signature: For Govind Kumar Saraf HUF - Govind Kumar Saraf

Designation: Karta

Date: 06.01.2023

Place: Kolkata

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# SAGAR CONSOLIDATED HOLDINGS PRIVATE LIMITED

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA  
E-MAIL ID: sarafgk@hotmail.com

To,  
GEE Limited  
Plot No. E-1, Road No. 7,  
Wagle Industrial Estate Thane,  
Maharashtra - 400 604, India

To,  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai - 400 001  
Maharashtra, India

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

Dear Sir,

With reference to the captioned subject, kindly find attached herewith Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge the receipt of the same.

Thanks & Regards,

For Sagar Consolidated Holdings Private Limited

~~Sagar Consolidated Holdings Pvt. Ltd~~

  
Director.

Govind Kumar Saraf  
Director (DIN: 00718228)

Place: Kolkata  
Date: 06.01.2023

# SAGAR CONSOLIDATED HOLDINGS PRIVATE LIMITED

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042  
KOLKATA - 700 019, WEST BENGAL, INDIA  
E-MAIL ID: sarafgk@hotmail.com

## Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	GEE Limited		
Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the Acquirer	Sagar Consolidated Holdings Private Limited		
Whether the acquirer belongs to Promoter / Promoter Group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC(**)
<b>Before the acquisition under consideration, holding of:</b>			
a) Shares carrying voting rights	4,62,649	1.78	NA
b) Shares in the nature of encumbrance (pledge / lien / non-disposal undertaking / others)	NA	NA	NA
c) Voting rights (VR) otherwise than by shares	NA	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)	NA	NA	NA
e) Total (a+b+c+d)	4,62,649	1.78	NA
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/sold	4,62,649	1.78	NA
b) VRs acquired / sold otherwise than by shares	NA	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	NA	NA	NA
d) Shares encumbered / invoked / released by the acquirer	NA	NA	NA
e) Total (a+b+c+/-d)	4,62,649	1.78	NA

Sagar Consolidated Holdings Pvt. Ltd

Director.



# SAGAR CONSOLIDATED HOLDINGS PRIVATE LIMITED

14, BALLYGUNGE PARK ROAD, PARK TOWER, FLAT NO. 042

KOLKATA - 700 019, WEST BENGAL, INDIA

E-MAIL ID: sarafgk@hotmail.com

<b>After the acquisition / sale, holding of:</b>			
a) Shares carrying voting rights	NA	NA	NA
b) Shares encumbered with the acquirer	NA	NA	NA
c) VRs otherwise than by shares	NA	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	NA	NA	NA
e) Total (a+b+c+d)	NA	NA	NA
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.).	Open Market		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	06.01.2023		
Equity share capital / total voting capital of the TC before the said acquisition / sale	25,988,466 Equity Shares of Rupees 2/- each		
Equity share capital / total voting capital of the TC after the said acquisition / sale	25,988,466 Equity Shares of Rupees 2/- each		
Total diluted share / voting capital of the TC after the said acquisition	25,988,466 Equity Shares of Rupees 2/- each		

(\*) Total share capital / voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 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.

**For Sagar Consolidated Holdings Private Limited**

Sagar Consolidated Holdings Pvt. Ltd.

Director.

Govind Kumar Saraf

Director (DIN: 00718228)

Signature of the Acquirer / Seller / Authorized Signatory

Place: Kolkata

Date: 06.01.2023

**FORM C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]**

Name of the company: **GEE Limited**  
ISIN of the company: **INE064H01021**

**Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)**

Name, PAN, CIN / DIN, & Address with Contact No.	Category of Person (Promoters / KMP / Directors / immediate relative to / others etc.)	Securities held prior to acquisition / disposal		Securities acquired / Disposed				Securities held post acquisition / disposal		Date of Allotment advice / Acquisition / Sale of shares / specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-settransfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy / Sale / Pledge/ Revoke /Invoke )	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	From	To			
Name: Sagar Consolidated Holdings Private Limited PAN: AAEC3810P CIN: U67120WB1992PT C056424 Director: Govind Kumar Saraf DIN: 00718228 Address: 14, Ballygunge Park Road, Park Tower Flat No. 042, Kolkata – 700 019 Contact: 9831007020	Promoter	Equity Shares	4,62,649 1.78%	Equity Shares	4,62,649	2,98,12,083.73	Sale	Equity Shares	NIL	06.01.2023	06.01.2023	Open Market	BSE Limited	

*Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.*

**Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and others such persons as mentioned in Regulation 6(2). Not Applicable**

Type of contract	Trading in derivatives (Specify type of contract, Futures or Options etc.)					Exchange on which the trade was executed
	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	

*Note: In case of Options, notional value shall be calculated based on Premium ~~plus~~ strike price of options.*

**Sagar Consolidated Holdings Pvt. Ltd**

**Director**  
Name & Signature: For Sagar Consolidated Holdings Private Limited - Govind Kumar Saraf

Designation: Director (DIN: 00718228)

Date: 06.01.2023

Place: Kolkata

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