WILMAR SUGAR HOLDINGS PTE. LTD.

(Incorporated in the Republic of Singapore) (Company Registration No.: 200513041E) 56 Neil Road, Singapore 088830

24 October 2019

The Listing Department
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G
Bandra Kurla Complex
Bandra (East), Mumbai – 400051

NSE Symbol: RENUKA

Department of Corporate Services BSE Limited

Phiroze Jeejeebhoy Towers Dalal Street Mumbai- 400001

BSE Scrip Code: 532670

Subject: Response to BSE Limited's Queries on the Disclosures dated 3 October 2019 made by Wilmar Sugar Holdings Pte. Ltd. under Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Dear Sirs,

We, Wilmar Sugar Holdings Pte. Ltd. ("WSHPL"), refer to our enclosed disclosures dated 3 October 2019 made to BSE Limited and the National Stock Exchange of India Limited on 3 October 2019 relation to the existing encumbrance of WSHPL, a promoter of Shree Renuka Sugars Limited, pursuant to SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated 7 August 2019.

We wish to provide the following clarification in response to queries received from Mr. Rakesh Parekh (Special Assistant from the Listing Compliance Department of BSE Limited) on 18 October 2019.

BSE Limited's Queries

Sr.No.	Name of Target Company	Regulation Ref.	Queries
1	Shree Renuka Sugars Ltd	SAST - 31(Pledge)	 Disclosures data pertains to - Wilmar Sugar Holdings Pte. Ltd. Ref Link - https://www.bseindia.com/corporates/ann.html?scrip=532670 Reason for encumbrance not given (Reason for Creation of Pledge or Release or Invoke of shares not given). Format of Disclosure are not as per Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 as per SEBI Circular (format revision w.e.f August 05, 2015)

WSHPL's Response

The "Reason for encumbrance" was set out in the earlier Annexure I dated 3 October 2019 under the column "Details of event pertaining to encumbrance (3)". It seems we have inadvertently used an earlier version of the disclosure forms.

The revised declaration is now made in the prescribed form as per Regulation 31(1) and 31(2) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 read with SEBI Circular (format revision w.e.f August 05, 2015). The information provided in our earlier disclosures dated 3 October 2019 are correct.

Please find attached herewith, the revised disclosures of Wilmar Sugar Holdings Pte. Ltd.

Kindly take the same on your records.

Yours faithfully,

For Wilmar Sugar Holdings Pte. Ltd.

Stephen Ho Kiam Kong

Director

Encl: As above.

CC To:

Shree Renuka Sugars Limited 2nd & 3rd Floor, Kanakashree Arcade, CTS No. 10634, JNMC Road, Nehru Nagur,

Belagavi - 590010, India



ANNEXURE - 1

Format for 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 Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company(TC)	SHREE RENUKA SUGARS LIMITED					
Names of the stock exchanges where the shares of the target company are listed	NATIONAL STOCK EXCHANGE OF INDIA LIMITED BSE LIMITED					
Date of reporting	22 OCTOBER 2019					
Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked	WILMAR SUGAR HOLDINGS PTE. LTD.					

Details of the creation of encumbrance:

Name of the promoter (s) or PACs with him*	holding in the		Promoter holding already encumbered (2)		Details of events pertaining to encumbrance (3)							Post event holding of encumbered shares {creation [(2)+(3)] / release [(2)-(3)] / invocation [(1)-(3)]]	
	Number	% of total share capital	Number	% of total share capital	Type of event (creation / release / invocation)	Date of creation/ release/ invocation of encumbrance	Type of encumbrance (pledge/ lien/ non disposal undertaking/ others)	Reasons for encumbrance **	Number	% of share capital	Name of the entity in whose favor shares encumbered ***	Number	% of total share capital
Wilmar Sugar Holdings Pte. Ltd.	1,118,204,751	58.34%	-	-	Creation	9 March 2018	Non-disposal undertaking	Pursuant to a non- disposal agreement dated 9 March 2018, Wilmar Sugar	498,373,016	26%	IDBI Bank Limited	498,373,016	26%

Holdings Pte. Ltd. undertook to certain banks to hold not less than 26% of the issued and paid up equity share capital of Shree Renuka Sugars Limited free from any security interest.



Signature of the Authorized Signatory

Place: Singapore

Date: 22 October 2019

Stephen Ho Kiam Kong Director

*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.