

Sunil DeepchandParakh
584, Salisbury Park, Gultekdi, Pune -411037

Date: 31/03/2021

To,

The Securities and Exchange Board of India,
SEBI Bhavan, Plot No. C4 – A, 'G' Block,
Bandra Kurla Complex (BKC), Bandra (East),
Mumbai – 400 051, India

Respected Sir / Madam,

Please find attached the disclosures under Regulation 10(7) – Report to Stock Exchange in respect of the acquisition of shares of Poona Dal and Oil Industries Limited, made in reliance upon exemption provided for Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

The Demand Draft(s) for myself (who are the acquirer(s)) amounting to Rs. 1,50,000/- (Rupees One Lakh Fifty Thousand) have been enclosed herewith, along with the related documents. I request you to take the same on the record.

Thanking you,

Yours Sincerely



Sunil DeepchandParakh

Encl:

1. Demand Draft(s) in favour of SEBI amounting to Rs. 1,50,000/-
2. Report disclosing under Regulation 10(7) by myself.
3. Copy of regulation 10 (5).
4. Copy of regulation 10 (6).
5. Copy of Disclosure pursuant to Regulation 29 under Chapter V of Takeover Code.

Format under Regulation 10(7) – Report to SEBI in respect of any acquisition made in reliance upon exemption provided for in regulation 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

| | | |
|----------|---|--|
| 1 | General Details | |
| | a. Name, address, telephone no., e-mail of acquirer(s) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond.} | Sunil Deepchand Parakh 584, Salisbury Park, Market Yard, Gultekdi, Pune – 411 037 9890095999 sunil@pdbmgroup.com |
| | b. Whether sender is the acquirer (Y/N) | Yes |
| | c. If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization) | NA |
| | d. Name, address, Tel no. and e-mail of sender, if sender is not the acquirer | NA |
| 2 | Compliance of Regulation 10(7) | |
| | a. Date of report | 31.03.2021 |
| | b. Whether report has been submitted to SEBI within 21 working days from the date of the acquisition | Yes |
| | c. Whether the report is accompanied with fees as required under Regulation 10(7) | Yes |
| 3 | Compliance of Regulation 10(5) | |
| | a. Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed atleast 4 working days before the date of the proposed acquisition. | Yes |
| | b. Date of Report | 30.03.2021 |

| | | |
|---|---|--------------------------------------|
| 4 Compliance of Regulation 10(6) | | |
| a. | Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed within 4 working days of the acquisition. | Yes |
| b. | Date of Report | 31.03.2021 |
| 5 Details of the Target Company | | |
| a. | Name & address of TC | Poona Dal and Oil Industries Limited |

| | | | | |
|-------------------------------------|---|---|---------------------------------------|-----------------------|
| b. | Name of the Stock Exchange(s) where the shares of the TC are listed | Bombay Stock Exchange Limited | | |
| 6 Details of the acquisition | | | | |
| a. | Date of acquisition | 30.03.2021 (but credit of the securities in favor of the acquirer DMAT A/c is awaited from the RTA for technical reasons) | | |
| b. | Acquisition price per share (in Rs.) | Nil | | |
| c. | Regulation which would have been triggered off, had the report not been filed under Regulation 10(7). (whether Regulation 3(1), 3(2), 4 or 5) | 3 (2) | | |
| d. | Shareholding of acquirer(s) and PAC individually in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)(*) | Before the acquisition | | After the acquisition |
| | | No. of Shares | % w.r.t total share capital of TC (*) | No. of Shares |
| | | | | |

| Acquirer(s) and PACs (other than sellers)(*) | | | | | |
|---|---------|--------|---------|--------|--|
| Acquirer – Sunil Deepchand Parakh | 286300 | 5.02% | 286600 | 5.021% | |
| PAC – being Promoter and Promoter Group & Immediate Relatives | | | | | |
| Sudarshanabai Deepchand Parakh | 1755179 | 30.74% | 1755179 | 30.74% | |
| Deepchand Kesharchand Parakh | 614810 | 10.77% | 614810 | 10.7% | |
| Sunil Deepchand Parakh (HUF) | 321110 | 5.63% | 321110 | 5.63% | |
| Sujit Deepchand Parakh | 451850 | 7.92% | 451850 | 7.92% | |
| Rajashree Sunil Parakh | 293710 | 5.15% | 293710 | 5.15% | |
| Meera Sujit Parakh | 293960 | 5.15% | 293960 | 5.15% | |
| Total holding of Acquirer(s) and PACs (excluding the sellers who also belong to promoter group) | 4016919 | 70.38% | 4017219 | 70.40% | |

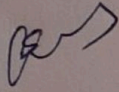
| e. | Shareholding of seller/s in TC (in terms of no. & as a percentage of the total share/voting capital of the TC) | Before the acquisition | | After the acquisition | |
|----|--|------------------------|-----------------------------------|-----------------------|-----------------------------------|
| | | No. of Shares | % w.r.t total share capital of TC | No. of Shares | % w.r.t total share capital of TC |
| | Name(s) of the seller(s) (**) | | | | |
| | Suraj Sunil Parakh | 300 | 0.005% | Nil | NA |

7 Information specific to the exemption category to which the instant acquisition belongs - Regulation 10(1)(a)(ii)

| | | | | |
|----|--|--------------------------------------|---------|--------|
| a. | Provide the names of the seller(s) | Suraj Sunil Parakh | | |
| b. | Specify the relationship between the acquirer(s) and the seller(s). | The Acquirer is father of the Seller | | |
| c. | Shareholding of the acquirer and the seller/s in the TC during the three years prior to the proposed acquisition | Year – 1 | Year -2 | Year-3 |
| | Acquirer(s) (*) | | | |
| | Sunil Deepchand Parakh | 286300 | 286300 | 286300 |
| c. | Sellers(s)(*) | | | |
| | Suraj Sunil Parakh | 300 | 300 | 300 |
| d. | Confirm that the acquirer(s) and the seller/s have been named promoters in the shareholding pattern filed by the target company in terms of the listing agreement or | Yes | | |

| | | |
|----|---|--|
| | the Takeover Regulations. Provide copies of such filings under the listing agreement or the Takeover Regulations. | |
| e. | If shares of the TC are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed. | Rs. 42.20/- |
| f. | Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (e) or (f) above as applicable | NA |
| g. | Date of issuance of notice regarding proposed acquisition to stock exchanges where the TC is listed | Under Regulation 10(5) - 30-03-2021 Under Regulation 10(6) - 31-03-2021 |
| h. | Whether the acquirers as well as sellers have complied with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). If yes, specify applicable regulation/s as well as date on which the requisite disclosures were made along with the copies of the same. | No |
| i. | Declaration by the acquirer that all the conditions specified under regulation 10(1) (a)(ii) with respect to exemptions has been duly complied with. | I declare that all the compliances under regulation 10 (1) (a) (ii) with respect of the exemptions are duly complied with. |

I/We hereby declare that the information provided in the instant report is true and nothing has been concealed there from.

Signature: 

Date: 31-03-2021

Place: Pune

Format for Disclosures under Regulation 10(6) – Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

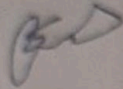
| | | | | | |
|----|--|---|--|--------------------|-----------------------------------|
| 1. | Name of the Target Company (TC) | Poona Dal and Oil Industries Limited | | | |
| 2. | Name of the acquirer(s) | Sunil Deepchand Parakh | | | |
| 3. | Name of the stock exchange where shares of the TC are listed | BSE Ltd | | | |
| 4. | Details of the transaction including rationale, if any, for the transfer/acquisition of shares. | Inter-se Transfer among Promoter | | | |
| 5. | Relevant regulation under which the acquirer is exempted from making open offer. | Regulation 10(1) (a)(i) and Regulation 10(1)(a)(ii) of SEBI (SAST) Regulation, 2011 | | | |
| 6. | Whether disclosure of proposed acquisition was required to be made under regulation 10(5) and if so, - whether disclosure was made and whether it was made within the timelines specified under the regulations. - date of filing with the stock exchange. | Yes. The declaration under 10(5) was made on <u>30.03.2021</u> and the date of Acquisition was <u>30.03.2021</u> | | | |
| 7. | Details of acquisition | Disclosures required to be made under regulation 10(5) | Whether the disclosures under regulation 10(5) are actually made | | |
| | a. Name of the transferor/seller | Suraj Sunil Parakh | Yes | | |
| | b. Date of acquisition | | | | |
| | c. Number of shares/voting rights in respect of the acquisitions from each person mentioned in 7(a) above | 300 | | | |
| | d. Total shares proposed to be acquired/actually acquired as a % of diluted share capital of TC | 0.005 | | | |
| | e. Price at which shares are proposed to be acquired / actually acquired | Inter se transfer among promoters pursuant to family Arrangement | | | |
| 8. | Shareholding details | Pre-Transaction | | Post-Transaction | |
| | | No. of shares held | % w.r.t total share capital of TC | No. of shares held | % w.r.t total share capital of TC |
| | a. Each Acquirer / Transferee (*) | 286300 | 5.02% | 286600 | 5.021% |
| | b. Each Seller / Transferor | 300 | 0.005% | Nil | NA |

Note:

- (*) Shareholding of each entity shall be shown separately and then collectively in a group.
- The above disclosures 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.

Date : 31/03/2021

Place : Pune



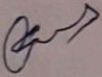
Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

| | | | |
|---|--------------------------------------|---|--|
| Name of the Target Company (TC) | Poona Dal and Oil Industries Limited | | |
| Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer | Sunil Deepchand Parakh | | |
| Whether the acquirer belongs to Promoter/Promoter group | Yes | | |
| Name(s) of the Stock Exchange(s) where the shares of TC | BSE Ltd | | |
| 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(**) |
| Before the acquisition under consideration, holding of: | | | |
| a) Shares carrying voting rights | | | |
| b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others) | 286300 | 5.02% | NA |
| c) Voting rights (VR) other than by shares | | | |
| d) Warrants/convertible securities/any other instrument that entitle the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) | | | |
| e) Total (a+b+c+d) | 286300 | 5.02% | NA |
| Details of acquisition/sale | | | |
| a) Shares carrying voting rights acquired/sold | 300 | 0.005% | NA |
| b) VRs acquired/sold other than by shares | | | |
| c) Warrants/convertible securities/any other instrument that entitle the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold | | | |
| d) Shares encumbered /invoked/released by the acquirer | | | |
| e) Total (a+b+c+/-d) | 300 | 0.005% | NA |

| | | | |
|--|-------------------|--------|----|
| After the acquisition/sale, holding of: | 286600 | 5.021% | NA |
| a) Shares carrying voting rights | | | |
| b) Shares encumbered with the acquirer | | | |
| c) VRs other than by shares | | | |
| 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 | | | |
| e) Total (a+b+c+d) | 286600 | 5.021% | NA |
| Mode of acquisition/sale (e.g. open market/off-market/public issue/rights issue/preferential allotment/inter-set transfer etc). | Inter Se Transfer | | |
| Date of acquisition/sale of shares/VR or date of receipt of intimation of allotment of shares, whichever is applicable | 30/03/2021 | | |
| Equity share capital/total voting capital of the TC before the said acquisition/sale | 286300 | | |
| Equity share capital/total voting capital of the TC after the said acquisition/sale | 286600 | | |
| Total diluted share/voting capital of the TC after the said acquisition | 0 | | |

(*) 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.


Sunil Deepchand Parakh
Signature of the acquirer

Place: Pune

Date: 30/03/2021

| | | | | | | | | | | | | |
|--|----------|---------------|--------|---------------|-----|----------------------------|--------------------------------------|---------------|--------|------------|------------|----------------------------|
| Sunil Deepchand Parakh PAN: AAXPP9213F 584/2, Salisbury Park, Market Yard, Gultekdi, Pune 411037 9890095999 | Promoter | Equity Shares | 286300 | Equity Shares | 300 | Inter se promoter transfer | Buy (Transfer from another Promoter) | Equity Shares | 286600 | 30.03.2021 | 28.03.2021 | Inter se Promoter Transfer |
|--|----------|---------------|--------|---------------|-----|----------------------------|--------------------------------------|---------------|--------|------------|------------|----------------------------|

Sunil Deepchand Parakh



Promoter

Date: 30.03.2021

Place: Pune