## HARNEESH KAUR ARORA

H.no. 473-A, Model Town Extn, Ludhiana, Punjab-141002

Date: 13.02.2024

To,

The Secretary (Department of Corporate Services) BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street Fort, Mumbai (MH) To,

The Board of Director Prime Industries Limited SCO 19, Master Chambers, Feroze Gandhi Market, Ludhiana-141001 Punjab

Subject: <u>Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares & Takeovers)</u> Regulations, 2011 for self & on behalf of PACs.

Respected Sir/ Madam,

With reference to the above subject, we are enclosing herewith disclosures as required under Regulation 29(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011) with regard to disposal of 1,25,000 equity shares of Prime Industries Limited.

Kindly take the same on record.

Thanking You.

Yours Faithfully,

For self & on behalf of PACs of Prime Industries Ltd.

Harneesh Kaur Arora

Encl.: as above

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

Name of the Target Company (TC)	Pi	rime Industries Li	mited				
Name(s) of the seller and Persons Acting in	1. Rajinder Kumar Singhania						
Concert (PAC) with the seller	2. Harneesh Kaur Arora and						
	PACs:						
	1. Priyanka Thukral Arora						
	2. Saint Co India Private Limited						
	<ol> <li>Crescent Investments (A Private Companwith Unlimited Liability)</li> <li>Jashanjyot Singh Arora</li> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Isha Singhania</li> <li>Arora Financial Services Private Limited</li> <li>Master Trust Limited</li> </ol>						
				A(I) at I			
				Whether the seller 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 sale / disposal as follows	Number	% w.r.t. total	% w.r.t.
						share/voting	total diluted
						capital	share/voting
						wherever	capital of
						applicable	the TC (*)
Before the sale / disposal under					1-17-21		
consideration, holding of :							
a) Shares carrying voting rights: -							
Rajinder Kumar Singhania	27,91,804	17.84%	13.30%				
2. Harneesh Kaur Arora	20,56,400						
	7(1, 10) 4(1)(1	13 1/1%					
3. Jashaniyot Singh Arora		13.14%	9.80%				
Jashanjyot Singh Arora     Harjeet Singh Arora	4,50,000	2.88%	2.14%				
4. Harjeet Singh Arora	4,50,000 1,33,902	2.88% 0.86%	2.14% 0.64%				
Harjeet Singh Arora     Chirag Singhania	4,50,000 1,33,902 1,00,000	2.88% 0.86% 0.64%	2.14% 0.64% 0.48%				
<ul><li>4. Harjeet Singh Arora</li><li>5. Chirag Singhania</li><li>6. Puneet Singhania</li></ul>	4,50,000 1,33,902 1,00,000 1,00,000	2.88% 0.86% 0.64% 0.64%	2.14% 0.64% 0.48% 0.48%				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000	2.88% 0.86% 0.64% 0.64% 0.64%	2.14% 0.64% 0.48% 0.48% 0.48%				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000 8,27,500	2.88% 0.86% 0.64% 0.64% 0.64% 5.29%	2.14% 0.64% 0.48% 0.48% 0.48% 3.94 %				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> <li>Arora Financial Services Private</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000	2.88% 0.86% 0.64% 0.64% 0.64%	2.14% 0.64% 0.48% 0.48% 0.48%				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> <li>Arora Financial Services Private Limited</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000 8,27,500 2,20,600	2.88% 0.86% 0.64% 0.64% 0.64% 5.29% 1.41%	2.14% 0.64% 0.48% 0.48% 0.48% 3.94 % 1.05%				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> <li>Arora Financial Services Private Limited</li> <li>Master Trust Limited</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000 8,27,500 2,20,600	2.88% 0.86% 0.64% 0.64% 0.64% 5.29% 1.41% 0.69%	2.14% 0.64% 0.48% 0.48% 0.48% 3.94 % 1.05%				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> <li>Arora Financial Services Private Limited</li> <li>Master Trust Limited</li> <li>Crescent Investments</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000 8,27,500 2,20,600 1,07,276 4,88,169	2.88% 0.86% 0.64% 0.64% 5.29% 1.41% 0.69% 3.12%	2.14% 0.64% 0.48% 0.48% 0.48% 3.94 % 1.05% 0.51% 2.32%				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> <li>Arora Financial Services Private Limited</li> <li>Master Trust Limited</li> <li>Crescent Investments</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000 8,27,500 2,20,600 1,07,276 4,88,169 73,75,651	2.88% 0.86% 0.64% 0.64% 0.64% 5.29% 1.41% 0.69% 3.12% 47.12%	2.14% 0.64% 0.48% 0.48% 0.48% 3.94 % 1.05% 0.51% 2.32% 35.12%				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> <li>Arora Financial Services Private Limited</li> <li>Master Trust Limited</li> <li>Crescent Investments</li> <li>TOTAL</li> <li>Shares in the nature of</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000 8,27,500 2,20,600 1,07,276 4,88,169	2.88% 0.86% 0.64% 0.64% 5.29% 1.41% 0.69% 3.12%	2.14% 0.64% 0.48% 0.48% 0.48% 3.94 % 1.05% 0.51% 2.32%				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> <li>Arora Financial Services Private Limited</li> <li>Master Trust Limited</li> <li>Crescent Investments</li> <li>TOTAL</li> <li>Shares in the nature of encumbrance (pledge/lien/non-</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000 8,27,500 2,20,600 1,07,276 4,88,169 73,75,651	2.88% 0.86% 0.64% 0.64% 0.64% 5.29% 1.41% 0.69% 3.12% 47.12%	2.14% 0.64% 0.48% 0.48% 0.48% 3.94 % 1.05% 0.51% 2.32% 35.12%				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> <li>Arora Financial Services Private Limited</li> <li>Master Trust Limited</li> <li>Crescent Investments</li> <li>TOTAL</li> <li>Shares in the nature of</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000 8,27,500 2,20,600 1,07,276 4,88,169 73,75,651	2.88% 0.86% 0.64% 0.64% 0.64% 5.29% 1.41% 0.69% 3.12% 47.12%	2.14% 0.64% 0.48% 0.48% 0.48% 3.94 % 1.05% 0.51% 2.32% 35.12%				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> <li>Arora Financial Services Private Limited</li> <li>Master Trust Limited</li> <li>Crescent Investments</li> <li>Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/ others)</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000 8,27,500 2,20,600 1,07,276 4,88,169 73,75,651 NIL	2.88% 0.86% 0.64% 0.64% 0.64% 5.29% 1.41% 0.69% 3.12% 47.12% NIL	2.14% 0.64% 0.48% 0.48% 0.48% 3.94 % 1.05% 0.51% 2.32% 35.12% N.A.				
<ol> <li>Harjeet Singh Arora</li> <li>Chirag Singhania</li> <li>Puneet Singhania</li> <li>Parveen Singhania</li> <li>Saintco India Private Limited</li> <li>Arora Financial Services Private Limited</li> <li>Master Trust Limited</li> <li>Crescent Investments</li> <li>TOTAL</li> <li>Shares in the nature of encumbrance (pledge/lien/non-</li> </ol>	4,50,000 1,33,902 1,00,000 1,00,000 1,00,000 8,27,500 2,20,600 1,07,276 4,88,169 73,75,651	2.88% 0.86% 0.64% 0.64% 0.64% 5.29% 1.41% 0.69% 3.12% 47.12%	2.14% 0.64% 0.48% 0.48% 0.48% 3.94 % 1.05% 0.51% 2.32% 35.12%				

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d) Warrants/convertible		<del> </del>	111111111111111111111111111111111111111
securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each			
category)			
Priyanka Thukral Arora	1,00,000		0.48%
2. Isha Singhania	1,00,000		0.48%
TOTAL (a+b+c+d)	75,75,651		36.08%
Details of sale/disposal  a) Shares carrying voting rights sold/disposed in open market by:  1. Rajinder Kumar Singhania 2. Harneesh Kaur Arora	1,25,000 1,25,000	0.80% 0.80%	0.60%
On dated 12.02.2024	1,23,000	0.60%	0.60%
b) VRs acquired otherwise than by equity shares	NIL	NIL	N.A.
c) Warrants/convertible securities/any other instrument that entitles the acquirer/seller to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold	NIL	NIL	N.A.
<ul> <li>d) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/ others)</li> </ul>	NIL	NIL	N.A.
TOTAL (a+b+c+d)	2,50,000	1.60%	1.20%
after the sale/disposal, holding of:  a) Shares carrying voting rights			
Rajinder Kumar Singhania	26,66,804	17.03%	12.70%
2. Harneesh Kaur Arora	19,31,400	12.34%	9.20%
3. Jashanjyot Singh Arora	4,50,000	2.88%	2.14%
4. Harjeet Singh Arora	1,33,902	0.86%	0.64%
5. Chirag Singhania	1,00,000	0.64%	0.48%
6. Puneet Singhania	1,00,000	0.64%	0.48%
7. Parveen Singhania	1,00,000	0.64%	0.48%
8. Saintco India Private Limited	8,27,500	5.29%	3.94 %
Arora Financial Services Private     Limited	2,20,600	1.41%	1.05%
10. Master Trust Limited	1,07,276	0.69%	0.51%
11. Crescent Investments	4,88,169	3.12%	2.32%
TOTAL	71,25,651	45.52%	33.93%
) VRs otherwise than by equity shares	NIL	NIL	N.A.



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) after acquisition:-	Sugar-			
1. Priyanka Thukral Arora	1,00,000		0.48%	
2. Isha Singhania	1,00,000		0.48%	
d) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/ others)	NIL	NIL	N.A.	
TOTAL (a+b+c+d)	73,25,651		34.88%	
Mode of sale (e.g. open market / off-market / public issue / rights issue /preferential allotment / inter-se transfer etc.)		open market		
Salient features of the securities sold	1,25,000 equity (i.e. 27,91,804) After sale/disp	shares from I in open marke oosal Shareho	hania has sold nis total holding t. olding of Mr. s of 26,66,804	
	2. Mrs. Harneesh Kaur Arora has sold 1,25,000 equity shares from her total holding (i.e. 20,56,400) in open market.			
	After sale/disposal Shareholding of Mrs. Harneesh Kaur Arora is of 19,31,400 equity shares.			
Date of sale of shares	12.02.2024			
Equity share capital / total voting capital of the TC before the said acquisition/sale	Rs. 7,82,67,000/- (1,56,53,400 equity shares of Rs. 5/- Each)			
Equity share capital/ total voting capital of the TC after the said acquisition/sale	Rs. 7,82,67,000/- (1,56,53,400 equity shares of Rs. 5/- Each)			
Total diluted share/voting capital of the TC after the said acquisition/sale	Rs. 10,50,17,000/- (2,10,03,400 Equity Shares of Rs. 5/- each)			

For and on behalf of Promoters and PACs Prime Industries Limited

Rajinder Kumar Singhania

Place: Ludhiana Date: 13.02.2024