

**CLEAR WATER COMMODITIES PRIVATE LIMITED**

**CIN: U51101GJ2012PTC070395**

**Regd Office: 56/A, Sthanakwasi Jain C.O.H. SOC., Usmanpura, Ahmedabad - 380013**

**Email Id: [infolahoti@gmail.com](mailto:infolahoti@gmail.com)**

**15<sup>th</sup> September, 2022**

To,  
**Department of Corporate Services,  
BSE Limited**  
P.J. Tower,  
Dalal Street, Fort,  
Mumbai-400 001

Dear Sir/Madam,

**Sub: Disclosure under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011**

With reference to the above mentioned subject please find enclosed herewith disclosure under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011 in respect of acquisition of 2000000 Equity Shares of Rhetan TMT Limited.

Please take the same on your records.

Thanking You,

Yours Faithfully,

**For and on behalf of Acquirer & their PACs**

*Rakesh Lahoti*

**Rakesh Lahoti  
Director of Clear Water Commodities Private Limited**



**Cc: Rhetan TMT Limited  
Compliance Officer**  
7<sup>th</sup> Floor, Ashoka Chambers,  
Opp. HCG Hospital,  
Mithakhali Six Roads,  
Mithakhali Ahmedabad - 380006

**ANNEXURE - 1**  
**Format for disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Name of the Target Company (TC)	Rhetan TMT Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Clear Water Commodities Private Limited		
Whether the acquirer belongs to Promoter/Promoter group	No		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited (SME Platform)		
Details of the acquisition/disposal as follows	Number	% w.r.t. total share/voting capital wherever applicabl	% w.r.t. total diluted share/voting capital of the TC (**)
<b>Before the acquisition under consideration, holding of acquirer along with PACs of:</b>			
a) Shares carrying voting rights Clear Water Commodities Private Limited	0	0.00	0.00
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
<b>e) Total (a+b+c+d)</b>	<b>0</b>	<b>0.00</b>	<b>0.00</b>

Clear Water Commodities Pvt Ltd

*Ravi*  
*isbat.*  
 Director

<p><b>Details of acquisition /sale</b></p> <p>a) Shares carrying voting rights acquired Clear Water Commodities Private Limited - On 08/09/2022 - On 13/09/2022</p> <p>b) VRs acquired /sold otherwise than by shares</p> <p>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</p> <p>d) Shares encumbered / invoked/released by the acquirer</p> <p>e) <b>Total (a+b+c+/-d)</b></p>	<p>750000 1250000</p> <p>NA NA</p> <p>NA</p> <p><b>2000000</b></p>	<p>3.53 5.88</p> <p>NA NA</p> <p>NA</p> <p><b>9.41</b></p>	<p>3.53 5.88</p> <p>NA NA</p> <p>NA</p> <p><b>9.41</b></p>
<p><b>After the acquisition/sale, holding of:</b></p> <p>a) Shares carrying voting rights acquired Clear Water Commodities Private Limited</p> <p>b) VRs acquired /sold otherwise than by shares</p> <p>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</p> <p>d) Shares encumbered / invoked/released by the acquirer</p> <p>e) <b>Total (a+b+c+/-d)</b></p>	<p><b>2000000</b></p> <p>NA NA NA</p> <p><b>2000000</b></p>	<p><b>9.41</b></p> <p>NA NA NA</p> <p><b>9.41</b></p>	<p><b>9.41</b></p> <p>NA NA NA</p> <p><b>9.41</b></p>
<p>Mode of acquisition/sale (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer/encumbrance, etc).</p>	<p>Open Market</p>		
<p>Date of acquisition of <del>/ date of receipt of intimation of allotment of shares/ VR/ warrants/convertible securities/any other instrument</del> that entitles the acquirer to receive shares in the TC.</p>	<p>1) 08/09/2022 2) 13/09/2022</p>		

Clear Water Commodities Pvt Ltd  
*Rajeev Khat.*  
 Director

Equity share capital / total voting capital of the TC before the said acquisition	Rs. 21,25,00,000/-
Equity share capital/ total voting capital of the TC after the said acquisition	Rs. 21,25,00,000/-
Total diluted share/voting capital of the TC after the said acquisition	Rs. 21,25,00,000/-

**For and on behalf of Acquirer & their PACs**

*Rakesh Lahoti*

**Rakesh Lahoti**  
**Director of Clear Water Commodities Private Limited**

**Date: 15/09/2022**

