



Date: 21st March, 2022

BSE Limited
Corporate Relation Department
Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai - 400 001
Stock code: 534328

National Stock Exchange of India Limited
Listing Department
Exchange Plaza
Bandra Kurla Complex, Bandra (East)
Mumbai – 400 051
Stock code: HEXATRADEX

Dear Sir/ Madam,

Subject: Disclosure under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 in relation to the outcome of the meeting of the Board of Directors (“Board”) of Hexa Tradex Limited (“Company”) held on March 21, 2022.

This is with reference to the captioned subject and continuation to our letters intimating that the Company has received the initial public announcement dated March 12, 2022 (“**Initial Public Announcement**”) made by Sundae Capital Advisors Private Limited, Manager to the Offer, on behalf of Siddeshwari Tradex Private Limited (“**Acquirer 1**”) Innox Global Multiventures Private Limited (“**Acquirer 2**”), Opelina Sustainable Services Private Limited (“**Acquirer 3**”), JSL Limited (“**Acquirer 4**”) (Acquirer 1, Acquirer 2, Acquirer 3 and Acquirer 4 are collectively referred to as the “**Acquirers**”) on behalf of the promoter group of the Company (“**Promoter Group**”) in accordance with Regulation 8 of the Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (“**Delisting Regulations**”) expressing the Acquirers’ intention to: (a) acquire all Equity Shares that are held by public shareholders of the Company; and (b) consequently, voluntarily delist the Equity Shares from the stock exchange where the Equity Shares are presently listed, namely BSE Limited and the National Stock Exchange of India Limited, by making a delisting offer in accordance with the Delisting Regulations (“**Delisting Proposal**”).

A meeting of the Board of Directors of the Company was held today i.e., March 21, 2022, wherein the Board *inter-alia* considered the following:

1. Reviewed and took on record the due-diligence report dated 21st March, 2022 (“**Report**”), submitted by the Mr. Awanish Kumar Dwivedi of M/s Dwivedi and Associates, Peer Review Company Secretary in compliance with Regulation 10 and other applicable provisions of the SEBI Delisting Regulations. The same is annexed as Annexure A.
2. Based on the information available with the Company and the Report, in accordance with Regulation 10(2) and other applicable provisions of the SEBI Delisting Regulations, the Board, certified that:
 - a. The Company is in compliance with the applicable provisions of securities laws;

Hexa Tradex Limited | www.hexatradex.com

Jindal Centre, 12, Bhikaiji Cama Place, New Delhi-110066, Phone:+91(11) 26188360-74, Fax:- +91(11) 26170691
Regd. Office: A-1, UPSIDC, Indl. Area, Nandgaon Road, Kosi Kalan, Distt. Mathura (U.P.) – 281403

CIN : L51101UP2010PLCO42382



- b. The Acquirers and their related entities are in compliance with the applicable provisions of securities laws in terms of the Report of the Peer Review Company Secretary including compliance with Regulation 4(5) of the SEBI Delisting Regulations; and
 - c. The Delisting Proposal, in the opinion of the Board, is in the interest of the shareholders of the Company.
3. After discussing and considering various factors of the Report, granted approval in accordance with Regulation 10(1) and other applicable provisions of the SEBI Delisting Regulations to the Delisting Proposal and consequent voluntary delisting of the Equity Shares of the Company from the stock exchanges where the Equity Shares are presently listed, namely BSE Limited and National Stock Exchange of India Limited, subject to receipt of approval of the shareholders of the Company and all other necessary regulatory or statutory approvals, as may be required, for Delisting Proposal.
4. Granted approval to the Company, to seek shareholders' approval for the Delisting Proposal by way of special resolution through postal ballot and e-voting in accordance with Regulation 11 of the SEBI Delisting Regulations and other applicable laws, and in this regard the draft of the postal ballot notice and the explanatory statement, attached thereto, were also approved. The Company has also been authorized to issue and the dispatch the aforesaid postal ballot notice and the explanatory statement to the shareholders of the Company, in accordance with the Companies Act, 2013 and other relevant applicable laws. In this regard, the Company has appointed Mr. Awanish Kumar Dwivedi of M/s Dwivedi & Associates, Company Secretaries bearing Membership Number '8055' and Certificate of Practice Number No. 9080, as a scrutinizer in terms of the Companies Act, 2013, read with the Companies (Management and Administration) Rules, 2014, to conduct the process of the postal ballot in a fair and transparent manner.
5. Authorized the Company, to obtain approvals from the BSE Limited and the National Stock Exchange of India Limited in accordance with the provisions of the SEBI Delisting Regulations, as well as any other regulatory, governmental or third parties' approval, as may be required, in relation to the Delisting Proposal.
6. The Board took on record the letter dated 21st March, 2022 received for and on behalf of the Acquirer(s) informing the Company that:
 - a. the floor price of the delisting offer is INR 153.16 (Indian Rupees One Hundred Fifty-Three and paise sixteen only) per Equity Share, which is determined in accordance with Regulation 20(2) of the SEBI Delisting Regulations read with Regulation 8 of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. In support of the aforesaid, the letter was accompanied by a certificate dated March 21, 2022 issued by RV FCS Abhinav Agarwal, Registered Valuer and Corporate Law Advisor (IBBI Reg. No.: IBBI/RV/06/2019/12564 and ICAI RVO Mem. No.: ICAIRVO/06/RV-P00292/2019-2020; and

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- b. the indicative price for the delisting offer is INR 156 (Indian Rupees One Hundred and Fifty-Six only).

Further, the audit report in accordance with Regulation 76 of the SEBI (Depositories and Participants) Regulations, 2018 read with Regulation 12(2) of the SEBI Delisting Regulations, in respect to the Equity Shares proposed to be delisted, covering a period of 6 months prior to the date of the application, shall be submitted to the Stock Exchanges along with the in-principal approval application.

The aforesaid meeting of the Board commenced at 4.40 P.M and concluded at 6.00 P.M.

We request you to kindly take the above on your record.

Yours sincerely,

For HEXA TRADEX LIMITED



Pravesh Srivastava
Company Secretary
ACS:20993

Encl: As above

Dwivedi & Associates

Company Secretaries

Due Diligence Report

[Pursuant to Regulation 10(3) of the SEBI (Delisting of Equity Shares) Regulations, 2021]

To,
The Board of Directors
HexaTradex Limited
A-1, Nandgaon Road,
UPSIDC Industrial Area,
Kosi Kalan, Mathura,
Uttar Pradesh - 281403

Dear Sir(s),

In terms of Regulation 10 of the Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (herein after called "**SEBI Delisting Regulations**"), we, M/s. Dwivedi & Associates, Practicing Company Secretaries, a Peer Reviewed Practicing Company Secretaries (bearing Peer Review Certificate No. 1632/2021), having been appointed by the Board of **HexaTradex Limited** (the "**Company**"), having CIN: L51101UP2010PLC042382, having its registered office at A-1, Nandgaon Road, UPSIDC Industrial Area, Kosi Kalan, Mathura, Uttar Pradesh - 281403 and corporate office at Jindal Centre, 12, Bhikaji Cama Place New Delhi 110 066, on March 12, 2022 through a resolution by circulation, to carry out the due diligence in accordance with Regulation 10(3) and other applicable provisions under SEBI Delisting Regulations and issue a Due Diligence Report (the "**DDR**").

1. Background

(a) The Company has received an Initial Public Announcement dated March 12, 2022, ("**Initial Public Announcement**") from Innox Global Multiventures Private Limited, Siddeshwari Tradex Private Limited, Opelina Sustainable Services Private Limited and JSL Limited (collectively the "**Acquirers**"), forming part of promoter and promoter group of the Company, in accordance with Regulation 8 of the SEBI Delisting Regulations, *inter alia* expressing their intention to: (a) acquire 2,03,73,648 fully paid up Equity Shares of the Company, having face value of Rs. 2/- each representing 36.88% of the paid up equity capital of the Company that are held by public shareholders (as defined under the SEBI Delisting Regulations and to be referred to as "Public Shareholders") either individually / collectively or together with other members of the Promoter Group or along with the persons acting in concert, as the case may be; and (b) consequently voluntarily delist the Equity Shares from the stock exchange where the Equity Shares of the Company are presently listed i.e., National Stock Exchange of India Limited ("**NSE**") and BSE Limited ("**BSE**") (NSE and BSE collectively referred to as "**Stock Exchanges**"), by making a delisting offer in accordance with the SEBI Delisting Regulations ("**Delisting Proposal**").

(b) The present structure of the capital of the Company is as under:

Particulars	Amount
Authorised Share Capital	
- 7,50,00,000 Equity Shares of face value Rs. 2 each	15,00,00,000
Issued Share Capital	



- 5,52,45,354* Equity Shares of face value Rs. 2 each	11,04,90,708
Subscribed and Paid up Share Capital	
- 5,52,44,704 Equity Shares of face value Rs. 2 each	11,04,89,408

*650 equity shares have been held in abeyance, and not allotted due to attachment orders by Court.

(c) Shareholding Pattern of the Company as on March 11, 2022 is as set forth below:

Category	No. of shares held	%age
Promoter and Promoter Group		
- Acquirers, who decides to make an offer for delisting of equity shares	76,67,224	13.88
- Other persons / entities forming part of the Promoter and Promoter Group along with persons acting in concert	2,72,03,832	49.24
Public shareholders	2,03,73,648	36.88
Total	5,52,44,704	100.00

(d) The distribution of shareholding including promoter of the Company as on March 11, 2022 is as set forth below:

Range of shareholding	No. of shareholders	% of shareholders	No. of shares held	% of total shares
1-500	14,437	94.21	9,84,666	1.78
501-1000	431	2.81	3,28,932	0.6
1001-2000	207	1.35	3,11,987	0.56
2001-3000	66	0.43	1,70,248	0.31
3001-4000	20	0.13	71,738	0.13
4001-5000	21	0.14	99,652	0.18
5001-10000	36	0.23	2,72,077	0.49
Above 10000	107	0.7	5,30,05,404	95.95
	15,325	100.00	5,52,44,704	100.00

2. Purpose and Requirement of the SEBI Delisting Regulations

2.1 In terms of Regulation 10(2) of the SEBI Delisting Regulations, the Board of Directors of the Company is required to:

- (a) obtain and furnish the details of buying, selling and dealing in the equity shares of the company by the acquirers or its related entities (including members of Promoter Group) during the period of two years prior to the date of board meeting held to consider the proposal for delisting, including the details of the top twenty-five shareholders for the said period and the details of off-market transactions of all such shareholders for a period of two years;



(b) obtain and furnish such further details as may be sought by the Peer Review Company Secretary.

2.2 In terms of Regulation 10(3) of the SEBI Delisting Regulations, the Peer Review Company Secretary is required to carry out the due-diligence and submit a report to the Board of Directors of the Company.

2.3 This report is submitted in terms of Regulation 10 (3) of the SEBI Delisting Regulations to enable the Board of Directors of the Company to comply with the provisions of Regulations 10 of the SEBI Delisting Regulations and shall be used by the Company only for this purpose and for no other purpose whatsoever. The Company shall submit this report to the Board of Directors of the Company, the Promoter, the stock exchange, other regulatory authorities as may be required, any advisor(s) appointed by the Board of Directors specifically for the purpose of Delisting Proposal and the Manager to the Delisting Offer.

3. Methodology for Due Diligence

3.1 For the purpose of our review and analysis of the details of buying, selling and dealing in the equity shares of the company by the acquirers or its related entities and top 25 public shareholders during the period of two years prior to the date of board meeting, we requested the Company to obtain the following:

- (a) details of the trading on the Stock Exchanges in the Equity Shares of the Company for the period from March 12, 2020 till March 11, 2022 undertaken by the top 25 Public Shareholders and also the Promoters of the Company as on the date immediately preceding the date of the Board Meeting ("Review Period"), in accordance with Regulation 10(2)(a) and other relevant provisions of the SEBI Delisting Regulations. Trade Data here means details of trading in Equity Shares undertaken by such shareholders provided by the Stock Exchange for the Review Period and excludes data for off market trades.
- (b) weekly Beneficial Positions statements ("Benpos") as forwarded by the Company (sent by Registrar & Transfer Agent of the Company viz. RCMC Share Registry Private Limited ("Registrar" or "RTA")) in relation to Top 25 Public Shareholders and Promoter for the period from March 12, 2020 to March 11, 2022, including the above referred period of two years for verifying the off market trades undertaken by such shareholders

4. Documents, Information and Data sourced and relied

In order to carry out our Due Diligence and to prepare this Report, we have reviewed, analyzed and relied on the following documents and information obtained from the Company, Registrar, Stock Exchanges, as well as information available on the websites of Stock Exchanges and in public domain:

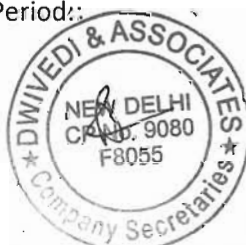
4.1 Details of buying, selling and dealing in the equity shares of the Company on the Stock Exchanges by Promoter and Promoter Group during the period from March 12, 2020 to March 11, 2022 annexed herewith as **Annexure I**;



- 4.2 Details of off market transactions by Promoter or Promoter Group during the period from March 12, 2020 to March 11, 2022 annexed herewith as **Annexure II**;
- 4.3 Details of buying, selling and dealing in the equity shares of the Company on Stock Exchanges by Top 25 public shareholders during the period from March 12, 2020 to March 11, 2022 annexed herewith as **Annexure III**;
- 4.4 Details of off-market transactions by Top 25 public shareholders in the equity shares of the Company during the period from March 12, 2020 to March 11, 2022 as per the depositories record based on weekly benpos annexed herewith as **Annexure IV**;
- 4.5 Representation letter dated March 16, 2022 from the Acquirers confirming that to the best of their knowledge, none of the public entities / persons mentioned in the list of top 25 (twenty five) Public Shareholders is related to acquirers (including the Promoter and Promoter Group). (Representation Letter from Acquirers”).
- 4.6 Based on the information available on the stock exchange, the compliances / disclosures by the Promoter during the Review Period under Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (“**SEBI SASTRegulations**”) and the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“**SEBI PIT Regulations**”) and amendments thereto. However, we note that Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI LODR Regulations**”) and Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (“**SEBI SBEB Regulations**”) are not applicable to the Acquirer(s).
- 4.7 We have considered the compliances / disclosures by the Top 25 public shareholders during the Review Period based on the available information on the websites of the Stock Exchanges under SEBI SAST Regulations and amendments thereto. However, we note that SEBI LODR Regulations, SEBI SBEB Regulations and SEBI PIT Regulations need not be verified for the buying, selling and dealing in the equity shares of the Company by the Top 25 public shareholders.
- 4.8 For the purpose of verifying details in relation to the term “related entities of the acquirers” as specified in regulation 10(2)(a) of the SEBI Delisting Regulations, we have considered the definition of “Acquirers” given in Regulation 2(1)(b)(ii) of SEBI Delisting Regulations and other Promoters and Promoter Group persons / entities as given under Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (SEBI ICDR Regulations). We have considered the name and shareholding of the Promoter and Promoter Group to ensure that it does not appear in the Top 25 Public Shareholders.
- 4.9 We have also analysed the shareholding pattern filed by the Company with the Stock Exchange for the last two years beginning from the quarter ended December 31, 2019 to December 31, 2021.

5. Certification

- 5.1 Based on our review of the Trade Data, RTA Benpos, Representation letter dated March 16, 2022, We hereby certify that, during the Review Period:



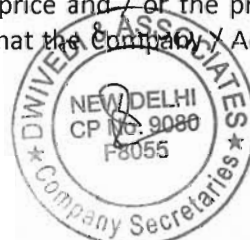
- a. The buying, selling and dealing in the equity shares of the company carried out by the Acquirers or their related entities and the top twenty five public shareholders is in compliance with the applicable provisions of securities laws;
- b. The Acquirers have not, directly or indirectly, –
 - (i) employed any device, scheme or artifice to defraud any shareholder or other person; or
 - (ii) engaged in any transaction or practice that operates as a fraud or deceit upon any shareholder or other person; or
 - (iii) engaged in any act or practice that is fraudulent, deceptive or manipulative

in connection with delisting of Equity Shares of the Company sought or permitted or exit opportunity given or other acquisition of Equity Shares made under the SEBI Delisting Regulations.

6. Assumption & Limitation of Scope & Review:

Representation letter dated March 16, 2022 from the Acquirers confirming that to the best of their knowledge none of the public entities/persons mentioned in the list of Top 25 (twenty-five) Public Shareholders are related to acquirers and other matters.

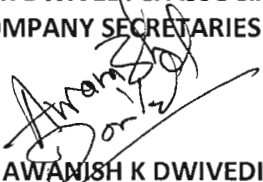
- 6.1 Ensuring the authenticity of documents and information furnished is the responsibility of the Board of Directors of the Company.
- 6.2 This DDR is based on due diligence of documents/ information shared by the Company for our review. Our responsibility is to give report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion. Therefore, this due diligence shall not be construed as an investigation or forensic audit.
- 6.3 Certain Top 25 Public Shareholders are intermediaries registered with the Securities and Exchange Board of India e.g. Stock Broker. The said holding by a Stock Broker may be in form of shares held as margin or pending for transfer to the demat account of their client/s. Accordingly, the status of beneficial ownership of Equity Shares of the Company by such Stock broker cannot be confirmed or verified.
- 6.4 Shares transferred by the Company to the Investor Protection and Education Fund has not been considered for the purpose of assessment of top 25 Public Shareholders.
- 6.5 Various concepts viz. defraud, deceit, fraudulent, deceptive, manipulative are used in the SEBI Delisting Regulations. However, parameters / methodology for determining the same are not prescribed therein. By reading these terminologies, it can be construed that the Acquirers shall not directly or indirectly cause any loss to the Public Shareholders by adopting any malpractice.
- 6.6 Based on publicly available information, we have checked whether the Acquirers or the Company has common registered office or directorship. We do not have any negative observation.
- 6.7 We are not expressing any opinion on the Floor price and / or the price at which the shares would ultimately be delisted. We have assumed that the Company / Acquirer(s) would comply



with the applicable provisions related to floor price. Further, we are not an investment adviser or tax advisor or a broker / dealer. This report should not be construed as investment / disinvestment advise.

6.8 This DDR is solely for the intended purpose of delisting of Equity Shares of the Company and for your information and it is not to be used, circulated, quoted or otherwise referred to for any purpose other than Delisting purposes and as required under the SEBI Delisting Regulations.

**FOR DWIVEDI & ASSOCIATES
COMPANY SECRETARIES**


**CS AWANISH K DWIVEDI
FCS 8055, CP No. 9080
UDIN F008055C002997283**

**Place : New Delhi
Date : March 21,2022**



Annexure I

Details of buying, selling and dealing in the equity shares of the Company on Stock Exchanges by Promoter and Promoter Group during the period from March 12, 2020 till March 11, 2022

Name of the Promoter / Promoter Group	Folio Nos / DP IDs in which shares held	Shareholding as on March 12, 2020		BSE		NSE		Shareholding as on March 11, 2022	
		No. of shares	%age	Buy	Sell	Buy	Sell	No. of shares	%age
Nalwa Sons Investments Limited	IN30011811459029, 0000483	1,07,10,000	19.39	-	-	-	-	1,07,10,000	19.39
Sigma Tech Inc	IN30011811764027	60,24,000	10.90	-	-	-	-	60,24,000	10.90
Siddeshwari Tradex Private Limited	IN30011811622437	-	-	-	-	22,53,239	-	47,52,984	8.60
Prithavi Raj Jindal	IN30011811734888 1203230001042611	26,20,637	4.74	-	-	-	-	26,20,637	4.74
OPJ Trading Private Limited	1201910102197207	23,03,826	4.17	-	-	-	-	23,03,826	4.17
JSL Limited	IN30011811614010	22,23,800	4.03	-	-	-	-	22,23,800	4.03
Radius Multiventures Private Limited	IN30133021783650	19,79,925	3.58	-	-	-	-	19,79,925	3.58
Virtuous Tradecorp Private Limited	IN30011811613488	16,56,224	3.00	-	-	-	-	16,56,224	3.00
Glebe Trading Private Limited	IN30011811562946	5,19,720 ¹	0.94	-	-	-	-	-	-
Danta Enterprises Private Limited	IN30011811614052	19,80,025 ¹	3.58	-	-	-	-	-	-
Opelina Sustainable Services Private Limited	IN30011811531351	-	-	-	-	6,50,000	-	6,50,000	1.18
Estrela Investment Company Limited	IN30088814275266	3,75,500	0.68	-	-	-	-	3,75,500	0.68
Templar Investments Limited	IN30088814275258	3,71,300	0.67	-	-	-	-	3,71,300	0.67



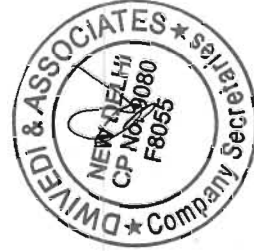
Mendeza Holdings Limited	IN30112716067314	3,66,500	0.66	-	-	-	-	-	3,66,500	0.66
Nacho Investments Limited	IN30112716067323	3,65,000	0.66	-	-	-	-	-	3,65,000	0.66
Indresh Batra	IN30011810617253	1,54,000	0.28	-	-	-	-	-	1,54,000	0.28
Meredith Traders Private Limited	IN30133019780636 0000923	86,800	0.16	-	-	-	-	-	86,800	0.16
Naveen Jindal	IN30011810988819	43,740	0.08	-	-	-	-	-	43,740	0.08
Gagan Trading Company Limited	IN30088814042028 0000499	43,200	0.08	-	-	-	-	-	43,200	0.08
Innox Global Multiventures Private Limited	IN30133021785384	40,440	0.07	-	-	-	-	-	40,440	0.07
Savitri Devi Jindal	IN30302852745678	20,760	0.04	-	-	-	-	-	20,760	0.04
R K Jindal & Sons HUF	1201410000021079	16,320	0.03	-	-	-	-	-	16,320	0.03
Ratan Jindal	IN30302857829665	15,240	0.03	-	-	-	-	-	15,240	0.03
Arti Jindal	IN30011810988827	12,000	0.02	-	-	-	-	-	12,000	0.02
Shradha Jatia	IN30045014705070	8,500	0.02	-	-	-	-	-	8,500	0.02
Urvi Jindal	IN30302852578547	6,000	0.01	-	-	-	-	-	6,000	0.01
P R Jindal HUF	1201410000021083	4,320	0.01	-	-	-	-	-	4,320	0.01
S K Jindal And Sons HUF	1601010000384239	4,320	0.01	-	-	-	-	-	4,320	0.01
Deepika Jindal	IN30011810988237 IN30290241512737	3,000	0.01	-	-	-	-	-	3,000	0.01
Sminu Jindal	IN30011810250263	3,000	0.01	-	-	-	-	-	3,000	0.01
Tripti Jindal	IN30011810993920	3,000	0.01	-	-	-	-	-	3,000	0.01
Abhyuday Jindal	IN30302870039681	3,000	0.01	-	-	-	-	-	3,000	0.01
Naveen Jindal HUF	IN30011811084338	1,320	0.00	-	-	-	-	-	1,320	0.00



Naveen Jindal As Trustee Of Global Vision Trust	IN30011811700409	-	0.00	-	-	1,000	-	1,000	0.00
JSW Holdings Limited	IN30112716405774	100	0.00	-	-	100	-	100	0.00
Sajjan Jindal	IN30133019008250	100	0.00	-	-	100	-	100	0.00
Sajjan Jindal As Trustee Of Sajjan Jindal Family Trust	IN30133021761205	100	0.00	-	-	100	-	100	0.00
Sajjan Jindal As Trustee Of Sajjan Jindal Lineage Trust	IN30133021761213	100	0.00	-	-	100	-	100	0.00
Sajjan Jindal As Trustee Of Sangita Jindal Family Trust	IN30133021768174	100	0.00	-	-	100	-	100	0.00
Sajjan Jindal As Trustee Of Tarini Jindal Family Trust	IN30133021768182	100	0.00	-	-	100	-	100	0.00
Sajjan Jindal As Trustee Of Tanvi Jindal Family Trust	IN30133021768199	100	0.00	-	-	100	-	100	0.00
Sajjan Jindal As Trustee Of Parth Jindal Family Trust	IN30133021768203	100	0.00	-	-	100	-	100	0.00
Vinamra Consultancy Pvt Ltd	IN30133021393445	100	0.00	-	-	100	-	100	0.00
Sahyog Holdings Private Limited	IN30133021386010	100	0.00	-	-	100	-	100	0.00
Sangita Jindal	IN30133019101277	100	0.00	-	-	100	-	100	0.00
Tarini Jindal Handa	IN30133019099878	100	0.00	-	-	100	-	100	0.00
Tanvi Shete	IN30133019093900	100	0.00	-	-	100	-	100	0.00
Parth Jindal	IN30133019093895	100	0.00	-	-	100	-	100	0.00
Anbeeco Investments Limited	-	-	0.00	-	-	-	-	-	0.00
Total		3,19,66,817	57.88	-	-	29,04,239	-	3,48,71,056	63.12

Note:

- 24,99,745 equity shares were transferred to SiddheswariTradex Private Limited on February 10, 2021 pursuant to Scheme of Amalgamation among Danta Enterprises Private Limited , Glebe Trading Private Limited and SiddheswariTradex Private Limited. Remaining 22,53,239 equity shares were purchased from market on various dates. However, no shares were purchased/sold prior to six months from the date of Initial Public Announcement.



Annexure II

Details of off market transactions by Promoter or Promoter Group during the period from March 12, 2020 till March 11, 2022 as per the depositories record based on weekly benpos

Name of the Promoter/ Promoter Group	Folio Nos / DP IDs in which shares held	Shareholding as on March 12, 2020		Buy / Credit in demat account	Sell / Debit in demat account	Shareholding as on March 11, 2022	
		No. of shares	%age			No. of shares	%age
Nalwa Sons Investments Limited	IN30011811459029, 0000483	1,07,10,000	19.39	-	-	1,07,10,000	19.39
Sigma Tech Inc	IN30011811764027	60,24,000	10.90	-	-	60,24,000	10.90
Siddeshwari Tradex Private Limited	IN30011811622437	-	-	47,52,984 ²	-	47,52,984	8.60
Prithavi Raj Jindal	IN30011811734888 1203230001042611	26,20,637	4.74	-	-	26,20,637	4.74
Opj Trading Private Limited	1201910102197207	23,03,826	4.17	-	-	23,03,826	4.17
Jsl Limited	IN30011811614010	22,23,800	4.03	-	-	22,23,800	4.03
Radius Multiventures Private Limited	IN30133021783650	19,79,925	3.58	-	-	19,79,925	3.58
Virtuous Tradecorp Private Limited	IN30011811613488	16,56,224	3.00	-	-	16,56,224	3.00
Glebe Trading Private Limited	IN30011811562946	5,19,720 ²	0.94	-	(5,19,720) ²	-	-
Danta Enterprises Private Limited	IN30011811614052	19,80,025 ²	3.58	-	(19,80,025) ²	-	-
Opelina Sustainable Services Private Limited	IN30011811531351	-	-	6,50,000	-	-	1.18
Estrela Investment Company Limited	IN30088814275266	3,75,500	0.68	-	-	3,75,500	0.68
Templar Investments Limited	IN30088814275258	3,71,300	0.67	-	-	3,71,300	0.67
Mendeza Holdings Limited	IN30112716067314	3,66,500	0.66	-	-	3,66,500	0.66
Nacho Investments Limited	IN30112716067323	3,65,000	0.66	-	-	3,65,000	0.66



Indresh Batra	IN30011810617253	1,54,000	0.28	-	-	1,54,000	0.28
Meredith Traders Private Limited	IN30133019780636 0000923	86,800	0.16	-	-	86,800	0.16
Naveen Jindal	IN30011810988819	43,740	0.08	-	-	43,740	0.08
Gagan Trading Company Limited	IN30088814042028 0000499	43,200	0.08	-	-	43,200	0.08
Innox Global Multiventures Private Limited	IN30133021785384	40,440	0.07	-	-	40,440	0.07
Savitri Devi Jindal	IN30302852745678	20,760	0.04	-	-	20,760	0.04
R K Jindal & Sons HUF	1201410000021079	16,320	0.03	-	-	16,320	0.03
Ratan Jindal	IN30302857829665	15,240	0.03	-	-	15,240	0.03
Arti Jindal	IN30011810988827	12,000	0.02	-	-	12,000	0.02
Shradha Jatia	IN30045014705070	8,500	0.02	-	-	8,500	0.02
Urvi Jindal	IN30302852578547	6,000	0.01	-	-	6,000	0.01
P R Jindal HUF	1201410000021083	4,320	0.01	-	-	4,320	0.01
S K Jindal And Sons HUF	1601010000384239	4,320	0.01	-	-	4,320	0.01
Deepika Jindal	IN30011810988237 IN30290241512737	3,000	0.01	-	-	3,000	0.01
Sminu Jindal	IN30011810250263	3,000	0.01	-	-	3,000	0.01
Tripti Jindal	IN30011810993920	3,000	0.01	-	-	3,000	0.01
Abhyuday Jindal	IN30302870039681	3,000	0.01	-	-	3,000	0.01
Naveen Jindal HUF	IN30011811084338	1,320	0.00	-	-	1,320	0.00
Naveen Jindal As Trustee Of Global Vision Trust	IN30011811700409	-	0.00	1,000	-	1,000	0.00
Jsw Holdings Limited	IN30112716405774	100	0.00	-	-	100	0.00
Sajjan Jindal	IN30133019008250	100	0.00	-	-	100	0.00
Sajjan Jindal As Trustee Of Sajjan Jindal Family Trust	IN30133021761205	100	0.00	-	-	100	0.00
Sajjan Jindal As Trustee Of Sajjan Jindal Lineage Trust	IN30133021761213	100	0.00	-	-	100	0.00
Sajjan Jindal As Trustee Of Sangta Jindal Family Trust	IN30133021768174	100	0.00	-	-	100	0.00



Sajjan Jindal As Trustee Of Tarini Jindal Family Trust	IN30133021768182	100	0.00	-	-	100	0.00
Sajjan Jindal As Trustee Of Tanvi Jindal Family Trust	IN30133021768199	100	0.00	-	-	100	0.00
Sajjan Jindal As Trustee Of Parth Jindal Family Trust	IN30133021768203	100	0.00	-	-	100	0.00
Vinamra Consultancy Pvt Ltd	IN30133021393445	100	0.00	-	-	100	0.00
Sahyog Holdings Private Limited	IN30133021386010	100	0.00	-	-	100	0.00
Sangita Jindal	IN30133019101277	100	0.00	-	-	100	0.00
Tarini Jindal Handa	IN30133019099878	100	0.00	-	-	100	0.00
Tanvi Shete	IN30133019093900	100	0.00	-	-	100	0.00
Parth Jindal	IN30133019093895	100	0.00	-	-	100	0.00
Anbeeco Investments Limited	-	-	0.00	-	-	-	0.00
Total		3,19,66,817	57.88	54,03,984	(24,99,745)	3,48,71,056	63.12

Note:

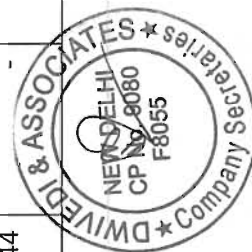
1. The above summary is based on the debit / credit transactions in the records of the depositories (i.e. NSDL & CDSL) and may not reflect actual sale or purchase undertaken by such holder of equity shares in their demat account. The transfer of shares in the aforesaid demat accounts may also be on account of settlement obligation for the equity shares of the Company sold by such shareholders on the floor of the stock exchange and already covered in Annexure I of this Due Diligence Report.
2. 24,99,745 equity shares were transferred to SiddheswariTradex Private Limited on February 10, 2021 pursuant to Scheme of Amalgamation among Danta Enterprises Private Limited , Glebe Trading Private Limited and SiddheswariTradex Private Limited. Remaining 22,53,239 equity shares were purchased from market on various dates. However, no shares were purchased/sold prior to six months from the date of Initial Public Announcement.



Annexure III

Details of buying, selling and dealing in the equity shares of the Company on Stock Exchanges by top 25 public shareholders during the period from March 12, 2020 till March 11, 2022

Sr. No.	Name of shareholder	Folio Nos / DP IDs in which shares held	Shareholding as on March 12, 2020		BSE		NSE		Shareholding as on March 11, 2022	
			No. of shares	%age	Buy	Sell	Buy	Sell	No. of shares	%age
1	Cresta Fund Limited	IN30016710043437	54,89,085	9.94	-	-	-	-	54,89,085	9.94
2	Albula Investment Fund Limited	IN30016710055229	50,04,027	9.06	-	-	-	-	50,04,027	9.06
3	Priti Anuj Badjate	1207780000000021	-	-	22,954	(567)	38,02,644	(15,68,205)	22,54,633	4.08
4	Trinity Opportunity Fund I	IN30134820153384	10,71,567	1.94	-	-	-	-	10,71,567	1.94
5	Anil Kantiprasad Poddar	IN30051310995758 IN30051320298871	0	-	51,000	-	4,83,126	-	9,77,849	1.77
6	Rajasthan Global Securities Private Limited	IN30072410153429	-	-	4,793	(10,000)	7,57,283	(43,515)	7,08,561	1.28
7	Kaushik Shah Shares and Sec Private Limited	1601480000574488	0	-	1,75,162	(43,800)	5,48,026	(3,31,926)	3,46,595	0.63
8	Srinivas Boddu	IN30154934648697 1208160000589568	0	-	59,330	-	1,22,680	-	1,82,010	0.33
9	Kaushik Surendra Shah	IN30311611657001	3,50,000	0.63	-	-	-	(1,90,000)	1,60,000	0.29
10	Sarita Rajeshkumar Kalani	1207780000010815	1,03,426	0.19	-	-	50,000	(10,000)	1,43,426	0.26
11	National Stock Exchange Of India	IN30611412331343	2,44,978	0.44	-	(29,796)	-	(89,645)	1,25,537	0.23



Annexure IV

Details of off-market transactions by top 25 public shareholders in the equity shares of the Company during the period from March 12, 2020 till March 11, 2022 as per the depositories record based on weekly benpos

Sr. No.	Name of shareholder	Folio Nos / DP IDs in which shares held	Shareholding as on March 12, 2020		Buy / Credit in demat account	Sell / Debit in demat account	Shareholding as on March 11, 2022	
			No. of shares	%age			No. of shares	%age
1	Cresta Fund Limited	IN30016710043437	54,89,085	9.94	-	-	54,89,085	9.94
2	Albula Investment Fund Limited	IN30016710055229	50,04,027	9.06	-	-	50,04,027	9.06
3	Priti Anuj Badjate	1207780000000021	-	-	37,87,147	(15,32,514)	22,54,633	4.08
4	Trinity Opportunity Fund I	IN30134820153384	10,71,567	1.94	-	-	10,71,567	1.94
5	Anil Kantiprasad Poddar	IN30051310995758 IN30051320298871	0	-	9,77,849	-	9,77,849	1.77
6	Rajasthan Global Securities Private Limited	IN30072410153429	-	-	7,62,076	(53,515)	7,08,561	1.28
7	Kaushik Shah Shares and Sec Private Limited	1601480000574488	0	-	6,33,534	(2,86,939)	3,46,595	0.63
8	Srinivas Boddu	IN30154934648697 1208160000589568	0	-	1,82,010	-	1,82,010	0.33
9	Kaushik Surendra Shah	IN30311611657001	3,50,000	0.63	-	(1,90,000)	1,60,000	0.29
10	Sarita Rajeshkumar Kalani	1207780000010815	1,03,426	0.19	50,000	(10,000)	1,43,426	0.26
11	National Stock Exchange Of India Limited Account	IN30611412331343	2,44,978	0.44	-	(1,19,441)	1,25,537	0.23



12	Dhanerash Suppliers Private Limited	1207780000009311	0	-	1,95,893	(1,00,000)	95,893	0.17
13	Kashyap Jayant Desai	IN30021417036067	59,999	0.11	10,001	-	70,000	0.13
14	Subhash P Rathod	IN30177410228174 1203450000199467	0	-	96,141	(42,980)	53,161	0.10
15	VinujRamchandran Nair	1201090007968150 1203320034817265	50,006	0.09	42	(3,006)	47,042	0.09
16	Harit Exports Limited	1202250000103798	0	-	50,000	(5,000)	45,000	0.08
17	TarunShantilal Joshi	IN30160410414065	50,000	0.09	-	(5,000)	45,000	0.08
18	Anuj ShantilalBadjate HUF	1207780000000049	1,00,000	0.18	95,523	(1,51,415)	44,108	0.08
19	Sandhya Ahuja	1304140009533811	0	-	1,03,100	(59,300)	43,800	0.08
20	Babuna Devi	1203980000131511	0	-	63,729	(22,038)	41,691	0.08
21	Kavita Mukesh Chandan	IN30160410435382	18,378	0.03	33,099	(10,000)	41,477	0.08
22	Sudha Rani Pavuluri	1204340000086788	0	-	39,983	-	39,983	0.07
23	Ranjit Seth	1208160014878078	24,694	0.04	14,778	-	39,472	0.07
24	Saajan S Rathod	IN30359110023661	0	-	50,000	(11,341)	38,659	0.07
25	Meena Kaushik Shah	IN30311611657261	35,000	0.06	1,50,000	(1,50,000)	35,000	0.06

Note:

- The above summary is based on the debit / credit transactions in the records of the depositories (i.e. NSDL & CDSL) and may not reflect actual sale or purchase undertaken by such holder of equity shares in their demat account. The transfer of shares in the aforesaid demat accounts may also be on account of settlement obligation for the equity shares of the Company sold by such shareholders on the floor of the stock exchange and already covered in Annexure III of this Due Diligence Report.

