



# SUBIR DIAMONDS PVT. LTD.

**DIAMOND MANUFACTURERS IMPORTERS & EXPORTERS**

To,

Date: 21.01.2022

1. BSE Limited  P. J. Towers, Dalal Street Mumbai – 400001	2. Punit Commercials Limited  AW 2022, 'A' Tower, 2nd Floor, Bharat Diamond, Bourse, Bandra-Kurla Complex, Bandra E, Mumbai-400051, Maharashtra
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Dear Sir/ Madam,

**Sub: Disclosure under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015**

**Unit: Punit Commercials Limited**

I, Nirav Prabodh Mehta, Director of Subir Diamonds Private Limited, submit that the Company have transferred 31,550 Equity shares of Rs.10/- each pursuant to the Share Purchase Agreement dated 01.11.2021 entered with the acquirer i.e. Mrs. Vinita Raj Narayanam. In this regard, please find enclosed herewith prescribed Form C under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

This is for the information and records of the Company and the Exchange, please.

Thanking you.

Yours sincerely,

For Subir Diamonds Private Limited

Nirav Prabodh Mehta  
Director  
(DIN: 00518614)



Encl: As above

**FORM C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7(2) read with Regulation 6(2) Continual disclosure]**

Name of the company: Punit Commercials Limited

ISIN of the company: INE750G01019

**Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters Member of Promoter Group/ Designated Person/ Director/ Immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed			
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures, Rights Entitlements etc.)	No. and % of shareholding	Type of securities (For e.g.– Shares, Warrants, Convertible Debentures, Rights Entitlements etc.)	No.	Value	Transaction Type (Purchase/ Sale/Pledge/ Revocation/ Invocation/ Others-please specify)
1	2	3	4	5	6	7	8
<b>Name:</b> Subir Diamonds Private Limited  <b>PAN:</b> AAACS6287Q  <b>Address:</b> AW 2022, 'A' Tower, 2nd Floor, Bharat Diamond Bourse, Bandra-Kurla Complex, Bandra E Mumbai Mumbai City, 400051, Maharashtra  <b>Mobile No.</b> 9820031363	Promoter	Equity Shares	31,550 (13.15%)	Equity Shares	31,550	Rs. 20,50,750	Others - Open offer (off-market)



Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/disposal of shares specify		Date of intimation to company	Mode of acquisition /disposal (on market/public/ rights/preferential offer/off Market/Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
Type of securities (For e.g.- Shares, Warrants, Convertible Debentures, Rights Entitlements etc.)	No. and % of shareholding	From	To			
9	10	11	12	13	14	15
Equity Shares	-	20.01.2022	20.01.2022	21.01.2022	Disposal - Open offer (off-market)	NA


**Note:** (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.  
(ii.) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives of the company by Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22
Nil	Nil	Nil	Nil	Nil	Nil	Nil

**Note:** In case of Options, notional value shall be calculated based on Premium plus strike price of options.

Yours sincerely,  
For **Subir Diamonds Private Limited**

  
**Nirav Prabodh Mehta**  
Director

(DIN: 00518614)  
Date: 21.01.2022  
Place: Mumbai

