



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 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011


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

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

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

Name of the Target Company (TC)	Punit Commercials Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Subir Diamonds Private Limited Name(s) of the Persons Acting in Concert (PAC) with the acquirer: 1. Sakshi Nirav Mehta 2. Priya Nirav Mehta 3. Purnima Prabodh Mehta 4. Nirav Prabodh Mehta		
Whether the acquirer 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 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	31,550	13.15	13.15
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
c) Voting rights (VR) otherwise than by shares	-	-	-
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)	-	-	-
e) Total (a+b+c+d)	31,550	13.15	13.15
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold	31,550	13.15	13.15
b) VRs acquired /sold otherwise than by shares	-	-	-
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/sold	-	-	-
d) Shares encumbered / invoked/released by the acquirer	-	-	-
e) Total (a+b+c+/-d)	31,550	13.15	13.15

After the acquisition/sale, holding of:			
a) Shares carrying voting rights	-	-	-
b) Shares encumbered with the acquirer	-	-	-
c) VRs otherwise 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)	-	-	-
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Open offer (off-market)		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	20.01.2022		
Equity share capital / total voting capital of the TC before the said acquisition / sale	2,40,000 equity shares of Rs. 10/- each		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	2,40,000 equity shares of Rs. 10/- each		
Total diluted share/voting capital of the TC after the said acquisition	2,40,000 equity shares of Rs. 10/- each		

(*) 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.

FOR SUBIR DIAMONDS PVT. LTD.

DIRECTOR

Signature of the acquirer / seller / Authorised Signatory

Place: Mumbai

Date: 21.01.2022
