

ADITYA AGARWAL

Address: 223 Jagriti Enclave, Delhi-110092

Date: 29-12-2022

**To,
Narayani Steels Limited
23A, N.S. Road 7th Floor,
Room-31 Kolkata - 700001**

Re.: Details of change in holding of Securities of Promoter, Member of the Promoter Group as required under Regulation 7(2) read with Regulation 6(2) and Regulation 7(3) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir,

I hereby submit the disclosure as required under Regulation 7(2) read with Regulation 6(2) and Regulation 7(3) of SEBI (Prohibition of Insider Trading) Regulations, 2015, regarding sale of 544,095 (4.99%) equity shares through Offer for Sale through the Stock Exchange Mechanism in compliance with the SEBI OFS Circulars of different date read with Rule 19A(5) of the SCRR which mandates that in cases where the public shareholding falls below 10% due to CIRP, such listed companies are required to bring public shareholding to at least 10% within a period of 12 months and to 25% within 3 years from the date of such fall.

In this connection necessary disclosure under Regulation 7(2) read with Regulation 6(2) and Regulation 7(3) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for the above said acquisition in the prescribed format is enclosed herewith for your kind information and records.

Kindly take the same on record.

Thanking You,
Yours Faithfully,



ADITYA AGARWAL
Promoter Group

Encl. : Form C enclosed

FORM C

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

Name of the company: Narayani Steels Limited

ISIN of the company: INE715T01023

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 (Promoter/r/m member of the promoter group/designated person/Director/s immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				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 eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation/ Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
ADITYA AGARWAL PAN: DCXPA4115E Address: 223 Jagriti Enclave, Delhi-110092 Contact: 8287670465	Promoter Group	Equity Shares	20,00,000 18.36%	Equity Shares	(5,44,095) (4.99%)	Rs. 41198871.5	Sale through the Stock Exchange Mechanism in compliance with the SEBI OFS Circulars of different date read with Rule 19A(5) of the SCRR	Equity Shares	14,55,905 13.37%	27-12-2022	28-12-2022	29-12-2022	Through Stock Exchange Mechanism	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 on the securities 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

Not Applicable									
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Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.



Name & Signature: Aditya Agarwal

Designation: Promoters Group

Date: 29.12.2022

Place: Kolkata

ADITYA AGARWAL

Address: 223 Jagriti Enclave, Delhi-110092

Date: 29-12-2022

To,

BSE Limited

Phiroze Jeejeebhoy Towers,
Dalal Streets, Fort,
Mumbai - 400 001

Scrip Code: 540080

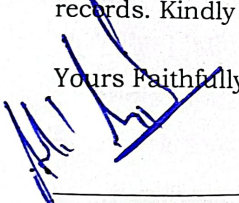
Reg.: Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 - Through Offer for Sale through the Stock Exchange Mechanism

Dear Sir,

I hereby submit the disclosure as required under Regulation 29(2) of the SEBI (SAST) Regulations, 2011, regarding sale of 544,095 (4.99%) equity shares through Offer for Sale through the Stock Exchange Mechanism in compliance with the SEBI OFS Circulars of different date read with Rule 19A(5) of the SCRR which mandates that in cases where the public shareholding falls below 10% due to CIRP, such listed companies are required to bring public shareholding to at least 10% within a period of 12 months and to 25% within 3 years from the date of such fall.

In this connection, necessary disclosure under Regulation 29(2) for the above said acquisition in the prescribed format is enclosed herewith for your kind information and records. Kindly take the same on record.

Yours Faithfully,



ADITYA AGARWAL
Promoter Group

Encl. as above

CC: Narayani Steels Limited, 23A, N.S. Road 7th Floor, Room-31 Kolkata - 700001

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

Name of the Target Company (TC)	Narayani Steels Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Aditya Agarwal		
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/disposal under consideration, holding of :			
a) Shares carrying voting rights	1,03,50,000	94.99%	94.99%
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 TC (specify holding in each category)			
e) Total (a+b+c+d)	1,03,50,000	94.99%	94.99%
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold	544,095	4.99%	4.99%
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)	544,095	4.99%	4.99%
After the acquisition/sale, holding of:			
a) Shares carrying voting rights	98,05,905	90.00%	90.00%
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)	98,05,905	90.00%	90.00%
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Through Offer for Sale through the Stock Exchange Mechanism		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	27-12-2022 to 28-12-2022		
Equity share capital / total voting capital of the TC before the said acquisition / sale	Rs. 10,89,54,500 comprising of 1,08,95,450 equity shares of Rs. 10/- each		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	Rs. 10,89,54,500 comprising of 1,08,95,450 equity shares of Rs. 10/- each		
Total diluted share/voting capital of the TC after the said acquisition/ sale	Rs. 10,89,54,500 comprising of 1,08,95,450 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.

Place: Kolkata

Date: December 29, 2022

Signature of the acquirer

Aditya Agarwal

Statement showing change in shareholding of each person belong to the promoters' group forming part of the Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 dated December 29, 2022

Name of Promoter	Before acquisition		Acquisition / (Disposal) No. of shares	After acquisition	
	No. of shares	%		No. of shares	%
Aditya Agarwal	20,00,000	18.36%	(5,44,095)	14,55,905	13.37%
Anup Poddar	4,00,000	3.67%	-	4,00,000	3.67%
Aspire Capital Pvt Ltd	10,00,000	9.18%	-	10,00,000	9.18%
OIPL India Pvt Ltd	10,00,000	9.18%	-	10,00,000	9.18%
PKG Financiers Pvt Ltd	5,00,000	4.59%	-	5,00,000	4.59%
Prachi Mittal	1,00,000	0.92%	-	1,00,000	0.92%
Priti Poddar	2,80,000	2.57%	-	2,80,000	2.57%
Rachana Agarwal	10,00,000	9.18%	-	10,00,000	9.18%
Rishikunj Vincom Pvt Ltd	2,50,000	2.29%	-	2,50,000	2.29%
Rupa Agarwal	6,00,000	5.51%	-	6,00,000	5.51%
Subhash Kumar Agarwal	4,00,000	3.67%	-	4,00,000	3.67%
Sumit Kumar Agarwal	10,00,000	9.18%	-	10,00,000	9.18%
Sumit Kumar Agarwal (HUF)	18,20,000	16.70%	-	18,20,000	16.70%
Total	1,03,50,000	94.99%	-	98,05,905	90.00%

Signature of the acquirer

Aditya Agarwal

Place: Kolkata

Date: December 29, 2022