

# Radha Devi Agrawal

D/253, Mahesh Marg, Malaviya Nagar, Jaipur- 302017

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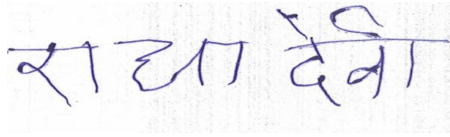
To  
Palco Metals Limited  
1715, Saiprasad Industrial Park-II,  
Besides Ramol Police Station, CTM-Ramol Road,  
Ahmedabad Gujarat

**Re: Disclosure under Regulation 29(1) of the Securities and Exchange Board of India(Substantial Acquisition of Shares and Takeovers) Regulations, 2011("Takeover Code")**

I, Radha Devi Agrawal, have acquired 190000 equity shares of Palco Metals Limited ("Target Company"), representing 4.75% of the total issued and paid-up equity share capital of the Target Company, on 01/03/2024 vide off market transaction after closing of market hours .

Enclosed is the disclosure as per Regulation 29(1) of the Takeover Code in the prescribed Format.

Kindly take the above on record and acknowledge receipt.



Radha Devi Agrawal

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

Name of the Target Company (TC)	Palco Metals Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	<p><u>Acquirer</u> Smt. Radha Devi Agarwal Smt. Radha Devi Agarwal (Mother of Seller). (Offmarket sale by Son to Mother by way of Gift deed).</p> <p><u>PAC</u> Kirankumar Babulal Agrawal Rajkumari Ashokkumar Agrawal Krishna Capital &amp; Securities Limited Krishna Sharebroking Service Private Limited Thakkar Financial Service Private Limited Vital Marketing &amp; Finance Private Limited Narendra Agarwal Kanaiyalal Babulal Agrawal Lalit Kumar Naredi</p>		
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 / <del>disposal</del> as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC(**)
<b>Before the acquisition under consideration, holding of :</b>			
a) Shares carrying voting rights			
Kirankumar Babulal Agrawal	4000	0.100%	0.100%
Rajkumari Ashokkumar Agrawal	88720	2.218%	2.218%
Krishna Capital & Securities Ltd	1360000	34.00%	34.00%
Krishna Sharebroking Ser. Pvt.Ltd.	338120	8.453%	8.453%
Thakkar Financial Service Pvt Ltd	190000	4.75%	4.75%
Vital Marketing & Finance Pvt. Ltd	190000	4.75%	4.75%
Narendra Agarwal	190000	4.75%	4.75%
Kanaiyalal Babulal Agrawal (HUF)	186200	4.65%	4.65%
Lalit Kumar Naredi	180000	4.50%	4.50%
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)	2727040	68.18	68.18

<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/ <del>old</del>			
Kirankumar Babulal Agrawal			
Rajkumari Ashokkumar Agrawal			
Krishna Capital & Securities Ltd			
Krishna Sharebroking Ser. Pvt.Ltd.			
Thakkar Financial Service Pvt Ltd			
Vital Marketing & Finance Pvt. Ltd			
Narendra Agarwal	(190000)	(4.75)	(4.75)
Kanaiyalal Babulal Agrawal (HUF)			
Lalit Kumar Naredi			
Radha Devi Agarwal	190000	4.75	4.75
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)	0	0	0

<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights			
Kirankumar Babulal Agrawal	4000	0.100%	0.100%
Rajkumari Ashokkumar Agrawal	88720	2.218%	2.218%
Krishna Capital & Securities Ltd	1360000	34.00%	34.00%
Krishna Sharebroking Ser. Pvt.Ltd.	338120	8.453%	8.453%
Thakkar Financial Service Pvt Ltd	190000	4.75%	4.75%
Vital Marketing & Finance Pvt. Ltd	190000	4.75%	4.75%
Narendra Agarwal	0	0	0
Kanaiyalal Babulal Agrawal (HUF)	186200	4.65%	4.65%
Lalit Kumar Naredi	180000	4.50%	4.50%
<b>Radha Devi Agarwal</b>	<b>190000</b>	<b>4.75%</b>	<b>4.75%</b>
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)	2727040	68.18	68.18
Mode of acquisition / <del>sale</del> (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	off-market		
Date of acquisition / <del>sale of shares</del> / VR or date of receipt of intimation of allotment of shares, whichever is applicable	01/03/2024		
Equity share capital / total voting capital of the TC before the said acquisition / <del>sale</del>	4000000		
Equity share capital/ total voting capital of the TC after the said acquisition / <del>sale</del>	4000000		
Total diluted share/voting capital of the TC after the said acquisition	4000000		

(\*)Total share capital/ voting capital to be taken as per the latest filing done by the company to the stock Exchange under Regulation 31 of the SEBI (Listing Obligations and Disclosure Requirements) (LODR) Regulations, 2015 (erstwhile 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.

**Signature of the acquirer / seller / Authorised Signatory :**

**Radha Devi Agarwal :**

Place: Ahmedabad

Date : 05/03/2024

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