

BHAVESH TRUST

12A, GREEN AVENUE,
SECTOR D, POCKET – 3,
VASANT KUNJ,
NEW DELHI - 110070

Dated: 7th July, 2021

The Listing Department
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor, Plot No. C-1
Block – G, Bandra - Kurla Complex
Bandra (East),
Mumbai –400 051
takeover@nse.co.in

The Deptt. of Corporate Services
The BSE Ltd
25, PJ Towers, Dalal Street
Mumbai – 400001
corp.relations@bseindia.com
corp.compliance@bseindia.com

Company Secretary
Jindal Poly Investment and Finance Company Limited
19th K.M. Hapur- Bulandshahr Road,
P.O. Gulaothi,
Distt. Bulandshahr, Uttar Pradesh-203408.
cs_jpifcl@jindalgroup.com

Sub: Disclosure under Regulation 29 (1) and (2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Scrip Code: NSE- JPOLYINVST, BSE- 536773

Dear Sirs,

With reference to captioned subject, please find enclosed herewith disclosure under Regulation 29 (1) and (2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of purchase of 11,30,189 equity shares of Jindal Poly Investment and Finance Company Limited (JPIFCL), representing 10.75% of total Equity Share Capital of JPIFCL on 6th July, 2021, pursuant to inter-se transfer of shares among promoters of JPIFCL.

This is for your information and records.

Yours truly,
For **Bhavesh Trust**


Authorised Signatory

Date: 07/07/2021
Place: New Delhi

Encl: as above

Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Part A – Details of the Acquisition

Name of the Target Company (TC)	Jindal Poly Investment and Finance Company Limited Scrip Code NSE: JPOLYINVST BSE: 536773		
Name(s) of the acquirer/seller and Persons Acting in Concert (PAC) with the acquirer	Acquirer: Bhavesh Trust Seller : Rishi Trading Co Ltd Persons Acting in Concert (PAC) <ol style="list-style-type: none"> 1. Aakriti Trust 2. Bhavesh Jindal 3. Shyam Sunder Jindal 4. Aakriti Ankit Agarwal 5. Consolidated Photo & Finvest Limited 6. Jindal Photo Investments Limited 7. Soyuz Trading Co. Ltd 8. SSJ Trust 		
Whether the acquirer/sellers belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	(i) National Stock Exchange of India Limited (NSE). ii) BSE Limited (BSE).		
Details of the acquisition/ sale 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/sale under consideration, holding of acquirer/seller along with PACs of : a) Shares carrying voting rights (Equity Shares) Acquirer: Bhavesh Trust: Persons Acting in Concert (PAC) <ol style="list-style-type: none"> 1. Jindal Photo Investments Limited 2. Rishi Trading Co Limited 3. Consolidated Photo & Finvest Limited 4. Soyuz Trading Co. Ltd 5. SSJ Trust 6. Aakriti Trust 7. Bhavesh Jindal 8. Shyam Sunder Jindal 9. Aakriti Ankit Agarwal 			
	29000	0.28	0.28
	-	0.00	0.00
	1130189	10.75	10.75
	-	0.00	0.00
	-	0.00	0.00
	6684498	63.59	63.59
	-	-	-
	1000	0.01	0.01
	-	-	-
	-	-	-

<p>b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)</p> <p>c) Voting rights (VR) otherwise than by equity shares.</p> <p>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)</p> <p>e) Total (a+b+c+d)</p>	78,44,687	74.64	74.64
Details of Acquisition/Sale			
<p>a) Shares carrying voting rights sold</p> <p style="padding-left: 20px;">Bhavesh Trust</p> <p>b) VRs acquired /sold otherwise than by shares</p> <p>c) Warrants/convertible securities or any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired.</p> <p>d) Shares in the nature of encumbrance (pledge)/lien/non-disposal undertaking/others)</p> <p>e) Total (a+b+c+d)</p>	<p>1130189</p> <p>1130189</p>	<p>10.75</p> <p>10.75</p>	<p>10.75</p> <p>10.75</p>
After the acquisition/sale, holding of acquirer/seller along with PACs of :			
<p>a) Shares carrying voting rights (Equity Shares)</p> <p>Acquirer: Bhavesh Trust:</p> <p>Persons Acting in Concert (PAC)</p> <ol style="list-style-type: none"> 1. Jindal Photo Investments Limited 2. Rishi Trading Co Limited 3. Consolidated Photo & Finvest Limited 4. Soyuz Trading Co. Ltd 5. SSJ Trust 6. Aakriti Trust 7. Bhavesh Jindal 8. Shyam Sunder Jindal 9. Aakriti Ankit Agarwal <p>b) VRs otherwise than by equity shares.</p> <p>c) Warrants/ convertible, securities/ any other instrument that entitles the acquirer to receive shares carrying voting rights in the</p>	<p>1159189</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>6684498</p> <p>-</p> <p>1000</p> <p>-</p> <p>-</p>	<p>11.03</p> <p>0.00</p> <p>0.00</p> <p>0.00</p> <p>0.00</p> <p>63.59</p> <p>0.00</p> <p>0.01</p> <p>0.00</p> <p>0.00</p>	<p>11.03</p> <p>0.00</p> <p>0.00</p> <p>0.00</p> <p>0.00</p> <p>63.59</p> <p>0.00</p> <p>0.01</p> <p>0.00</p> <p>0.00</p>

TC (specify holding in each category) after acquisition d) Shares in the nature of encumbrance (pledge)/ lien/non disposal undertaking /others) e) Total (a+b+c+d)	78,44,687	74.64	74.64
Mode of acquisition/Sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer/encumbrance etc).	Off market inter-se transfer of shares between the members of promoter group		
Date of acquisition/ sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	06 th July, 2021		
Equity share capital / total voting capital of the TC before the said acquisition / sale	1,05,11,929 Equity Shares of Rs. 10 each.		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	1,05,11,929 Equity Shares of Rs. 10 each.		
Total diluted share/voting capital of the TC after the said acquisition/sale	1,05,11,929 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 Bhavesh Trust


Authorised Signatory

Date: 07/07/2021
Place: New Delhi

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

Part A – Details of the Acquisition

Name of the Target Company (TC)	Jindal Poly Investment and Finance Company Limited Scrip Code NSE: JPOLYINVST BSE: 536773		
Name(s) of the acquirer/seller and Persons Acting in Concert (PAC) with the acquirer	Acquirer: Bhavesh Trust Seller: Rishi Trading Co Ltd Persons Acting in Concert (PAC) <ol style="list-style-type: none"> 1. Aakriti Trust 2. Bhavesh Jindal 3. Shyam Sunder Jindal 4. Aakriti Ankit Agarwal 5. Consolidated Photo & Finvest Limited 6. Jindal Photo Investments Limited 7. Soyuz Trading Co. Ltd 8. SSJ Trust 		
Whether the acquirer/sellers belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	(ii) National Stock Exchange of India Limited (NSE). ii) BSE Limited (BSE).		
Details of the acquisition/sale 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/sale under consideration, holding of acquirer/seller along with PACs of :			
a) Shares carrying voting rights (Equity Shares)			
Acquirer: Bhavesh Trust:	29000	0.28	0.28
Persons Acting in Concert (PAC)			
1. Jindal Photo Investments Limited	-	0.00	0.00
2. Rishi Trading Co Limited	1130189	10.75	10.75
3. Consolidated Photo & Finvest Limited	-	0.00	0.00
4. Soyuz Trading Co. Ltd	-	0.00	0.00
5. SSJ Trust	6684498	63.59	63.59
6. Aakriti Trust	-	-	-
7. Bhavesh Jindal	1000	0.01	0.01
8. Shyam Sunder Jindal	-	-	-
9. Aakriti Ankit Agarwal	-	-	-
b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)			

<p>e) Voting rights (VR) otherwise than by equity shares.</p> <p>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)</p> <p>e) Total (a+b+c+d)</p>	78,44,687	74.64	74.64
Details of Acquisition/Sale			
<p>a) Shares carrying voting rights sold</p> <p>Bhavesh Trust</p>	1130189	10.75	10.75
<p>b) VRs acquired /sold otherwise than by shares</p> <p>c) Warrants/convertible securities or any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired.</p> <p>d) Shares in the nature of encumbrance (pledge)/lien/non-disposal undertaking/others)</p> <p>e) Total (a+b+c+d)</p>	1130189	10.75	10.75
After the acquisition/sale, holding of acquirer/seller along with PACs of :			
<p>a) Shares carrying voting rights (Equity Shares)</p> <p>Acquirer: Bhavesh Trust:</p> <p>Persons Acting in Concert (PAC)</p> <p>1. Jindal Photo Investments Limited</p> <p>2. Rishi Trading Co Limited</p> <p>3. Consolidated Photo & Finvest Limited</p> <p>4. Soyuz Trading Co. Ltd</p> <p>5. SSJ Trust</p> <p>6. Aakriti Trust</p> <p>7. Bhavesh Jindal</p> <p>8. Shyam Sunder Jindal</p> <p>9. Aakriti Ankit Agarwal</p>	1159189	11.03	11.03
	-	0.00	0.00
	-	0.00	0.00
	-	0.00	0.00
	-	0.00	0.00
	6684498	63.59	63.59
	-	0.00	0.00
	1000	0.01	0.01
	-	0.00	0.00
	-	0.00	0.00
<p>b) VRs otherwise than by equity shares.</p> <p>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) after acquisition</p>			

d) Shares in the nature of encumbrance (pledge)/ lien/non-disposal undertaking /others)	78,44,687	74.64	74.64
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/encumbrance etc).	Off market inter-se transfer of shares between the members of promoter group		
Date of acquisition/ sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	06 th July, 2021		
Equity share capital / total voting capital of the TC before the said acquisition / sale	1,05,11,929 Equity Shares of Rs. 10 each.		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	1,05,11,929 Equity Shares of Rs. 10 each.		
Total diluted share/voting capital of the TC after the said acquisition/sale	1,05,11,929 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.

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