

**Date: 18.12.2021**

To,  
Asst. general Manager  
Dept. of corporate services  
BSE Limited,  
P.J. Towers, Dalal Street,  
Fort, Mumbai-400001

To  
The Secretary,  
The Calcutta Stock Exchange Limited  
7, Lyons Range, Kolkata 700001

**Ref.: Scrip Code: 541741**

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

Dear Sir,

Please find attached the disclosure under Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015, in connection with the acquisition/transfer of shares of Tinna Trade limited by off market transaction as per the detail mentioned below.

The shares have been acquired by way of inter se transfer amongst the promoters and Promoter Group pursuant to exemption provided in Regulation 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (qualifying person being persons named as promoters in the shareholding pattern filed by the target company for not less than three years prior to the proposed acquisition) and there has been no change in the Total Shareholding of the Promoters Group post such inter-se transfer of shares of TC.

The details of the same is as under:

Date of Transaction	Name of seller	Name of acquirer	No. of shares acquired	Percentage of holding w.r.t. total share capital of company
16.12.2021	Mrs. Aarti Sekhri	Mr. Bhupinder Kumar Sekhri	70431	0.82%
16.12.2021	Ms. Puja Sekhri	Mr. Bhupinder Kumar Sekhri	21744	0.25%

## **TINNA TRADE LIMITED**

CIN : L51100DL2009PLC186397

**Regd. Office :** No.-6, Sultanpur, (Mandi Road) Mehrauli, New Delhi-110030

Tel. No. : +91 11 4951 8530 (70 Lines) Fax : +91 11 2680 4883

E-mail : ttl.del@tinna.in Website: www.tinnatrade.in

To,  
Secretary  
BSE Limited  
P.J. Towers, Dalal Street  
Fort, Mumbai-400001

To  
The Secretary,  
The Calcutta Stock Exchange Limited  
7, Lyons Range, Kolkata 700001

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

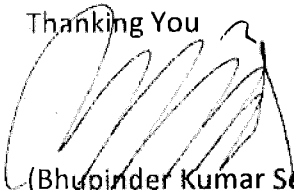
Dear Sir,

With reference to the captioned subject, I, Bhupinder Kumar Sekhri, Promoter of Tinna Trade Limited, hereby inform your good offices that I have acquired 92175 (1.08%) Equity Shares of the Company by way of off market transaction from Mrs. Aarti Sekhri and Ms. Puja Sekhri, Promoters of the Company.

In View of the above, enclosed the disclosure required under Regulation 7(2) of SEBI Prohibition of Insider Trading) Regulations, 2015.

Kindly take the same on record and suitably disseminate to all concerned.

Thanking You



(Bhupinder Kumar Sekhri)  
Promoter  
Acquirer

Place: NEW DELHI

Date: 16.12.2021

Encl: As above

CC to:

Tinna Trade Limited  
No.6, Sultanpur, Mandi Road, Mehrauli,  
New Delhi-110030



**FORM C**

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

Name of the company: TINNA TRADE LIMITED

ISIN of the company: INE401201019

**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/member of the promoter group/designated person/Director/s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities held to		Securities acquired/Disposed		Securities held post acquisition/disposal	Date of allotment advice/acquisition of shares/disposal of	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 entitlements etc.)	No. and % of share holding	Type of securities (For eg. - Share s, Warra nts, Conv ertible	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation/ Others- please specify)					

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Mr. Bhopinder Kumar Sekhri PAN- AAATPS6454P 448-451, Chin Min Farms, Satbari, Mehrauli, New Delhi-110030	Promoter	Equity shares	110287 (1.29%)	Equity shares	92175 (1.29%)	As per gift deed. Inter se transfer of shares amongst promoters through off-market transaction	Purchase/transfer. As per gift deed. Inter se transfer of shares amongst promoters through off-market transaction	Equity shares	202462 (2.36%)	16.12.2021	16.12.2021	16.12.2021	As per gift deed. Inter se transfer of shares amongst promoters through off-market transaction	Bombay Stock Exchange (BSE)

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 units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

  
 (Bhupinder Kumar Sekhri)  
 Promoter

Acquirer

Place: NEW DELHI

Date: 16.12.2021

We request you to take the above information on the record.

Thanking you

Yours faithfully,

For Tinna Trade Limited



(Monika Gupta)

Company Secretary and compliance officer

Mrem. No.- FCS-8015

To,  
Secretary  
BSE Limited  
P.J. Towers, Dalal Street  
Fort, Mumbai-400001

To  
The Secretary,  
The Calcutta Stock Exchange Limited  
7, Lyons Range, Kolkata 700001

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


Dear Sir,

With reference to the captioned subject, I, Aarti Sekhri, Promoter of Tinna Trade Limited, hereby inform your good offices that I have sold 70431 (0.82%) Equity Shares of the Company by way of off market transaction to Mr. Bhupinder Kumar Sekhri, Promoter of the Company.

In View of the above, enclosed the disclosure required under Regulation 7(2) of SEBI Prohibition of Insider Trading) Regulations, 2015.

Kindly take the same on record and suitably disseminate to all concerned.

Thanking You

  
(Aarti Sekhri)  
Promoter  
Seller/Transferor

Place: DELHI

Date: 16.12.2021

Encl: As above

CC to:  
Tinna Trade Limited  
No.6, Sultanpur, Mandi Road, Mehrauli,  
New Delhi-110030





Mrs. Aarti Sekhri PAN- AOJPS413 9K 448-451, Chin Min Farms, Satbari, Mehrauli, New Delhi- 110030	Promoter	Equity shares	151134 7(17.65 %)	Equity shares (0.82%)	70431	As per gift deed. Inter se transf er of share s amon gst promo ters throug h off- marke t transa ction	Sale / transfer As per gift deed. Inter se transfer of shares amongst promoter s through off- market transacti on	Equity shares (16.82%)	16.12.2021	16.12.2021	16.12.2021	As per gift deed. Inter se transfer of shares amongst promoters through off-market transactio n	Bombay Stock Exchange (BSE) As per gift deed. Inter se transfer of shares amongst promoters through off- market transaction
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**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

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



(Aarti Sekhri)

Promoter

Seller/Transferor

Place: DELHI

Date: 16.12.2021

To,  
Secretary  
BSE Limited  
P.J. Towers, Dalal Street  
Fort, Mumbai-400001

To  
The Secretary,  
The Calcutta Stock Exchange Limited  
7, Lyons Range, Kolkata 700001

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

Dear Sir,

With reference to the captioned subject, I, Puja Sekhri, Promoter of Tinna Trade Limited, hereby inform your good offices that I have sold 21744 (0.25%) Equity Shares of the Company by way of off market transaction to Mr. Bhupinder Kumar Sekhri, Promoter of the Company.

In View of the above, enclosed the disclosure required under Regulation 7(2) of SEBI Prohibition of Insider Trading) Regulations, 2015.

Kindly take the same on record and suitably disseminate to all concerned.

Thanking You



(Puja Sekhri)  
Promoter  
Seller/Transferor

Place: NEW DELHI

Date: 16.12.2021

Encl: As above

CC to:

Tinna Trade Limited  
No.6, Sultanpur, Mandi Road, Mehrauli,  
New Delhi-110030



1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Ms. Pujja Sekhri PAN- AOJPS422 OH 448-451, Chin Min Farms, Satbari, Mehrauli, New Delhi- 110030	Promoter	Equity shares	182886 0(21.35 %)	Equity shares	21744 (0.25%)	As per gift deed. Inter se transf er of share s	Sale / transfe r. As per gift deed. Inter se transfe r of shares among st promot ers throug h off- marke t transa ction	Equity shares	1807116 (21.10%)	16.12.2021	16.12.2021	16.12.2021	As per gift deed. Inter se transfer of shares amongst promoters through off-market transactio n	Bombay Stock Exchange (BSE)  As per gift deed. Inter se transfer of shares amongst promoters through off- market transaction

**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

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



(Puja Sekhri)

Promoter

Seller/Transferor

Place: NEW DELHI

Date: 16.12.2021