

**SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011**

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

Name of the Target Company (TC)	:	<b>VLS Finance Ltd.</b>																									
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	:	<table border="1"> <tr> <td rowspan="11" style="background-color: yellow;"><b>Mahesh Prasad Mehrotra (HUF)</b></td> <td>Divya Mehrotra</td> <td align="right">541393</td> </tr> <tr> <td>VLS Commodities Pvt. Ltd.</td> <td align="right">430468</td> </tr> <tr> <td>Sadhana Mehrotra</td> <td align="right">884691</td> </tr> <tr> <td>Vikas Mehrotra</td> <td align="right">485783</td> </tr> <tr> <td><b>Mahesh Prasad Mehrotra (HUF)</b></td> <td align="right"><b>1984262</b></td> </tr> <tr> <td>VLS Capital Ltd.</td> <td align="right">13335638</td> </tr> <tr> <td>Mahesh Prasad Mehrotra</td> <td align="right">1</td> </tr> <tr> <td>South Asian Enterprises Ltd.</td> <td align="right">0</td> </tr> <tr> <td>Daya Mehrotra</td> <td align="right">0</td> </tr> <tr> <td>Ramji Mehrotra</td> <td align="right">0</td> </tr> <tr> <td>Pragati Moulders Ltd.</td> <td align="right">0</td> </tr> <tr> <td align="right"><b>'Total</b></td> <td align="right"><b>17662236</b></td> </tr> </table>	<b>Mahesh Prasad Mehrotra (HUF)</b>	Divya Mehrotra	541393	VLS Commodities Pvt. Ltd.	430468	Sadhana Mehrotra	884691	Vikas Mehrotra	485783	<b>Mahesh Prasad Mehrotra (HUF)</b>	<b>1984262</b>	VLS Capital Ltd.	13335638	Mahesh Prasad Mehrotra	1	South Asian Enterprises Ltd.	0	Daya Mehrotra	0	Ramji Mehrotra	0	Pragati Moulders Ltd.	0	<b>'Total</b>	<b>17662236</b>
<b>Mahesh Prasad Mehrotra (HUF)</b>	Divya Mehrotra	541393																									
	VLS Commodities Pvt. Ltd.	430468																									
	Sadhana Mehrotra	884691																									
	Vikas Mehrotra	485783																									
	<b>Mahesh Prasad Mehrotra (HUF)</b>	<b>1984262</b>																									
	VLS Capital Ltd.	13335638																									
	Mahesh Prasad Mehrotra	1																									
	South Asian Enterprises Ltd.	0																									
	Daya Mehrotra	0																									
	Ramji Mehrotra	0																									
	Pragati Moulders Ltd.	0																									
<b>'Total</b>	<b>17662236</b>																										
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 , Calcutta Stock Exchange Ltd. The National Stock Exchange of India Ltd.																									

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/sale under consideration, holding of :				
a)	Shares carrying voting rights @	1984262	5.132%	5.132%
b)	Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NIL	NIL	NIL
c)	Voting rights (VR) otherwise than by shares	NIL	NIL	NIL
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)	NIL	NIL	NIL
e)	Total (a+b+c+d)	<b>1984262</b>	<b>5.132%</b>	<b>5.132%</b>

Details of acquisition/sale				
a)	Shares carrying voting rights-acquired/sold	0	0.000%	0.000%
b)	VRs acquired /sold otherwise than by shares	NIL	NIL	NIL
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.	NIL	NIL	NIL
d)	Shares encumbered/ invoked / released by the acquirer	NIL	NIL	NIL
e)	Total (a+b+c+/-d)	<b>0</b>	<b>0.000%</b>	<b>0.000%</b>

a)	Shares carrying voting rights \$	1984262	5.703%	5.703%
b)	Shares encumbered with the acquirer	NIL	NIL	NIL
c)	VRs otherwise than by shares	NIL	NIL	NIL
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	NIL	NIL	NIL
e)	Total (a+b+c+d)	<b>1984262</b>	<b>5.703%</b>	<b>5.703%</b>

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	:	3866205 Equity Shares Bought back by the Company from Open Market through Stock Exchange Route
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	:	<b>Date of Extinguishment of share bought back 02/02/2023, 06/03/2023, 29/03/2023, 08/05/2023 and 26/05/2023</b>
Equity share capital / total voting capital of the TC before the said acquisition /-sale	:	Rs. 38,78,42,420 (Total paid-up capital) 3,86,62,017 Equity shares (Total Voting capital)
Equity share capital/ total voting capital of the TC after the said acquisition / sale	:	Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)
Total diluted share/voting capital of the TC after the said acquisition/sale.	:	Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31(1)(b) of the listing regulations.

(\*\*) 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.

@ Percentage calculated on before buyback voting capital i.e. 38662017 equity shares.  
\$ Percentage calculated on post buyback voting capital i.e. 34795992 equity shares.

**SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011**

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

Name of the Target Company (TC)	:	<b>VLS Finance Ltd.</b>																																				
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	:	<table border="1"> <tr> <td><b>Mahesh Prasad Mehrotra</b></td> <td>Divya Mehrotra</td> <td>541393</td> </tr> <tr> <td></td> <td>VLS Commodities Pvt. Ltd.</td> <td>430468</td> </tr> <tr> <td></td> <td>Sadhana Mehrotra</td> <td>884691</td> </tr> <tr> <td></td> <td>Vikas Mehrotra</td> <td>485783</td> </tr> <tr> <td></td> <td>Mahesh Prasad Mehrotra (HUF)</td> <td>1984262</td> </tr> <tr> <td></td> <td>VLS Capital Ltd.</td> <td>13335638</td> </tr> <tr> <td></td> <td><b>Mahesh Prasad Mehrotra</b></td> <td><b>1</b></td> </tr> <tr> <td></td> <td>South Asian Enterprises Ltd.</td> <td>0</td> </tr> <tr> <td></td> <td>Daya Mehrotra</td> <td>0</td> </tr> <tr> <td></td> <td>Ramji Mehrotra</td> <td>0</td> </tr> <tr> <td></td> <td>Pragati Moulders Ltd.</td> <td>0</td> </tr> <tr> <td></td> <td><b>Total</b></td> <td><b>17662236</b></td> </tr> </table>	<b>Mahesh Prasad Mehrotra</b>	Divya Mehrotra	541393		VLS Commodities Pvt. Ltd.	430468		Sadhana Mehrotra	884691		Vikas Mehrotra	485783		Mahesh Prasad Mehrotra (HUF)	1984262		VLS Capital Ltd.	13335638		<b>Mahesh Prasad Mehrotra</b>	<b>1</b>		South Asian Enterprises Ltd.	0		Daya Mehrotra	0		Ramji Mehrotra	0		Pragati Moulders Ltd.	0		<b>Total</b>	<b>17662236</b>
<b>Mahesh Prasad Mehrotra</b>	Divya Mehrotra	541393																																				
	VLS Commodities Pvt. Ltd.	430468																																				
	Sadhana Mehrotra	884691																																				
	Vikas Mehrotra	485783																																				
	Mahesh Prasad Mehrotra (HUF)	1984262																																				
	VLS Capital Ltd.	13335638																																				
	<b>Mahesh Prasad Mehrotra</b>	<b>1</b>																																				
	South Asian Enterprises Ltd.	0																																				
	Daya Mehrotra	0																																				
	Ramji Mehrotra	0																																				
	Pragati Moulders Ltd.	0																																				
	<b>Total</b>	<b>17662236</b>																																				
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 , Calcutta Stock Exchange Ltd. The National Stock Exchange of India Ltd.																																				
Details of the acquisition / disposal as follows	:	<table border="1"> <thead> <tr> <th>Number</th> <th>% w.r.t. total share/voting capital wherever applicable (*)</th> <th>% w.r.t. total diluted share/ voting capital of the TC (**)</th> </tr> </thead> </table>	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/ voting capital of the TC (**)																																	
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 :					
a)	Shares carrying voting rights @	:	1	0.000%	0.000%
b)	Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	:	NIL	NIL	NIL
c)	Voting rights (VR) otherwise than by shares	:	NIL	NIL	NIL
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)	:	NIL	NIL	NIL
e)	Total (a+b+c+d)	:	1	0.000%	0.000%

Details of acquisition/sale					
a)	Shares carrying voting rights-acquired/sold	:	0	0.000%	0.000%
b)	VRs acquired /sold otherwise than by shares	:	NIL	NIL	NIL
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.	:	NIL	NIL	NIL
d)	Shares encumbered/ invoked / released by the acquirer	:	NIL	NIL	NIL
e)	Total (a+b+c+d)	:	0	0.000%	0.000%

a)	Shares carrying voting rights \$	:	1	0.000%	0.000%
b)	Shares encumbered with the acquirer	:	NIL	NIL	NIL
c)	VRs otherwise than by shares	:	NIL	NIL	NIL
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	:	NIL	NIL	NIL
e)	Total (a+b+c+d)	:	1	0.000%	0.000%

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	:	3866025 Equity Shares Bought back by the Company from Open Market through Stock Exchange Route
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	:	<b>Date of Extinguishment of share bought back 02/02/2023, 06/03/2023, 29/03/2023, 08/05/2023 and 26/05/2023</b>
Equity share capital / total voting capital of the TC before the said acquisition /-sale	:	Rs. 38,78,42,420 (Total paid-up capital) 3,86,62,017 Equity shares (Total Voting capital)
Equity share capital/ total voting capital of the TC after the said acquisition / sale	:	Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)
Total diluted share/voting capital of the TC after the said acquisition/sale.	:	Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31(1)(b) of the listing regulations.

(\*\*) 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.

@ Percentage calculated on before buyback voting capital i.e. 38662017 equity shares.

\$ Percentage calculated on post buyback voting capital i.e. 34795992 equity shares.

**SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011**

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

Name of the Target Company (TC)	: VLS Finance Ltd.
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	: <b>Pragati Moulders Ltd.</b> Divya Mehrotra 541393 VLS Commodities Pvt. Ltd. 430468 Sadhana Mehrotra 884691 Vikas Mehrotra 485783 Mahesh Prasad Mehrotra (HUF) 1984262 VLS Capital Ltd. 13335638 Mahesh Prasad Mehrotra 1 South Asian Enterprises Ltd. 0 Daya Mehrotra 0 Ramji Mehrotra 0 Pragati Moulders Ltd. 0 <b>Total 17662236</b>
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, Calcutta Stock Exchange Ltd. The National Stock Exchange of India Ltd.

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/sale under consideration, holding of :			
a)	Shares carrying voting rights @	0	0.000%
b)	Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NIL	NIL
c)	Voting rights (VR) otherwise than by shares	NIL	NIL
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)	NIL	NIL
e)	Total (a+b+c+d)	0	0.000%

Details of acquisition/sale			
a)	Shares carrying voting rights-acquired/sold	0	0.000%
b)	VRs acquired /sold otherwise than by shares	NIL	NIL
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.	NIL	NIL
d)	Shares encumbered/ invoked / released by the acquirer	NIL	NIL
e)	Total (a+b+c+d)	0	0.000%

a)	Shares carrying voting rights \$	0	0.000%
b)	Shares encumbered with the acquirer	NIL	NIL
c)	VRs otherwise than by shares	NIL	NIL
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	NIL	NIL
e)	Total (a+b+c+d)	0	0.000%

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	: 3866025 Equity Shares Bought back by the Company from Open Market through Stock Exchange Route
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	: Date of Extinguishment of share bought back 02/02/2023, 06/03/2023, 29/03/2023, 08/05/2023 and 26/05/2023
Equity share capital / total voting capital of the TC before the said acquisition /sale	: Rs. 38,78,42,420 (Total paid-up capital) 3,86,62,017 Equity shares (Total Voting capital)
Equity share capital/ total voting capital of the TC after the said acquisition / sale	: Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)
Total diluted share/voting capital of the TC after the said acquisition/sale.	: Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31(1)(b) of the listing regulations.  
 (\*\*) 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.

@ Percentage calculated on before buyback voting capital i.e. 38662017 equity shares.  
 \$ Percentage calculated on post buyback voting capital i.e. 34795992 equity shares.

**PRAGATI MOULDERS LTD.**  
**OR PRAGATI MOULDERS LTD.**

Pragati Moulders Ltd.

Date: 31-05-2023  
Place: New Delhi

*(Handwritten Signature)*

**SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011**

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

Name of the Target Company (TC)	:	<b>VLS Finance Ltd.</b>																																				
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	:	<table border="1"> <tr> <td><b>Divya Mehrotra</b></td> <td><b>Divya Mehrotra</b></td> <td align="right"><b>541393</b></td> </tr> <tr> <td></td> <td>VLS Commodities Pvt. Ltd.</td> <td align="right">430468</td> </tr> <tr> <td></td> <td>Sadhana Mehrotra</td> <td align="right">884691</td> </tr> <tr> <td></td> <td>Vikas Mehrotra</td> <td align="right">485783</td> </tr> <tr> <td></td> <td>Mahesh Prasad Mehrotra (HUF)</td> <td align="right">1984262</td> </tr> <tr> <td></td> <td>VLS Capital Ltd.</td> <td align="right">13335638</td> </tr> <tr> <td></td> <td>Mahesh Prasad Mehrotra</td> <td align="right">1</td> </tr> <tr> <td></td> <td>South Asian Enterprises Ltd.</td> <td align="right">0</td> </tr> <tr> <td></td> <td>Daya Mehrotra</td> <td align="right">0</td> </tr> <tr> <td></td> <td>Ramji Mehrotra</td> <td align="right">0</td> </tr> <tr> <td></td> <td>Pragati Moulders Ltd.</td> <td align="right">0</td> </tr> <tr> <td></td> <td align="right"><b>'Total</b></td> <td align="right"><b>17662236</b></td> </tr> </table>	<b>Divya Mehrotra</b>	<b>Divya Mehrotra</b>	<b>541393</b>		VLS Commodities Pvt. Ltd.	430468		Sadhana Mehrotra	884691		Vikas Mehrotra	485783		Mahesh Prasad Mehrotra (HUF)	1984262		VLS Capital Ltd.	13335638		Mahesh Prasad Mehrotra	1		South Asian Enterprises Ltd.	0		Daya Mehrotra	0		Ramji Mehrotra	0		Pragati Moulders Ltd.	0		<b>'Total</b>	<b>17662236</b>
<b>Divya Mehrotra</b>	<b>Divya Mehrotra</b>	<b>541393</b>																																				
	VLS Commodities Pvt. Ltd.	430468																																				
	Sadhana Mehrotra	884691																																				
	Vikas Mehrotra	485783																																				
	Mahesh Prasad Mehrotra (HUF)	1984262																																				
	VLS Capital Ltd.	13335638																																				
	Mahesh Prasad Mehrotra	1																																				
	South Asian Enterprises Ltd.	0																																				
	Daya Mehrotra	0																																				
	Ramji Mehrotra	0																																				
	Pragati Moulders Ltd.	0																																				
	<b>'Total</b>	<b>17662236</b>																																				
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 , Calcutta Stock Exchange Ltd. The National Stock Exchange of India Ltd.																																				
Details of the acquisition / disposal as follows	:	<table border="1"> <thead> <tr> <th>Number</th> <th>% w.r.t. total share/voting capital wherever applicable (*)</th> <th>% w.r.t. total diluted share/ voting capital of the TC (**)</th> </tr> </thead> </table>	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/ voting capital of the TC (**)																																	
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 :					
a)	Shares carrying voting rights @	:	541393	1.400%	1.400%
b)	Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	:	NIL	NIL	NIL
c)	Voting rights (VR) otherwise than by shares	:	NIL	NIL	NIL
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)	:	NIL	NIL	NIL
e)	Total (a+b+c+d)	:	<b>541393</b>	<b>1.400%</b>	<b>1.400%</b>

Details of acquisition/sale					
a)	Shares carrying voting rights-acquired/sold	:	0	0.000%	0.000%
b)	VRs acquired /sold otherwise than by shares	:	NIL	NIL	NIL
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.	:	NIL	NIL	NIL
d)	Shares encumbered/ invoked / released by the acquirer	:	NIL	NIL	NIL
e)	Total (a+b+c+d)	:	<b>0</b>	<b>0.000%</b>	<b>0.000%</b>

a)	Shares carrying voting rights \$	:	541393	1.556%	1.556%
b)	Shares encumbered with the acquirer	:	NIL	NIL	NIL
c)	VRs otherwise than by shares	:	NIL	NIL	NIL
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	:	NIL	NIL	NIL
e)	Total (a+b+c+d)	:	<b>541393</b>	<b>1.556%</b>	<b>1.556%</b>

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	:	3866025 Equity Shares Bought back by the Company from Open Market through Stock Exchange Route
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	:	<b>Date of Extinguishment of share bought back 02/02/2023, 06/03/2023, 29/03/2023, 08/05/2023 and 26/05/2023</b>
Equity share capital / total voting capital of the TC before the said acquisition /sale	:	Rs. 38,78,42,420 (Total paid-up capital) 3,86,62,017 Equity shares (Total Voting capital)
Equity share capital/ total voting capital of the TC after the said acquisition / sale	:	Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)
Total diluted share/voting capital of the TC after the said acquisition/sale.	:	Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31(1)(b) of the listing regulations.

(\*\*) 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.

@ Percentage calculated on before buyback voting capital i.e. 38662017 equity shares.  
\$ Percentage calculated on post buyback voting capital i.e. 34795992 equity shares.

**SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011**

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

Name of the Target Company (TC)	:	<b>VLS Finance Ltd.</b>																																				
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	:	<table border="1"> <tr> <td><b>Vikas Mehrotra</b></td> <td>Divya Mehrotra</td> <td>541393</td> </tr> <tr> <td></td> <td>VLS Commodities Pvt. Ltd.</td> <td>430468</td> </tr> <tr> <td></td> <td>Sadhana Mehrotra</td> <td>884691</td> </tr> <tr> <td></td> <td><b>Vikas Mehrotra</b></td> <td><b>485783</b></td> </tr> <tr> <td></td> <td>Mahesh Prasad Mehrotra (HUF)</td> <td>1984262</td> </tr> <tr> <td></td> <td>VLS Capital Ltd.</td> <td>13335638</td> </tr> <tr> <td></td> <td>Mahesh Prasad Mehrotra</td> <td>1</td> </tr> <tr> <td></td> <td>South Asian Enterprises Ltd.</td> <td>0</td> </tr> <tr> <td></td> <td>Daya Mehrotra</td> <td>0</td> </tr> <tr> <td></td> <td>Ramji Mehrotra</td> <td>0</td> </tr> <tr> <td></td> <td>Pragati Moulders Ltd.</td> <td>0</td> </tr> <tr> <td></td> <td><b>'Total'</b></td> <td><b>17662236</b></td> </tr> </table>	<b>Vikas Mehrotra</b>	Divya Mehrotra	541393		VLS Commodities Pvt. Ltd.	430468		Sadhana Mehrotra	884691		<b>Vikas Mehrotra</b>	<b>485783</b>		Mahesh Prasad Mehrotra (HUF)	1984262		VLS Capital Ltd.	13335638		Mahesh Prasad Mehrotra	1		South Asian Enterprises Ltd.	0		Daya Mehrotra	0		Ramji Mehrotra	0		Pragati Moulders Ltd.	0		<b>'Total'</b>	<b>17662236</b>
<b>Vikas Mehrotra</b>	Divya Mehrotra	541393																																				
	VLS Commodities Pvt. Ltd.	430468																																				
	Sadhana Mehrotra	884691																																				
	<b>Vikas Mehrotra</b>	<b>485783</b>																																				
	Mahesh Prasad Mehrotra (HUF)	1984262																																				
	VLS Capital Ltd.	13335638																																				
	Mahesh Prasad Mehrotra	1																																				
	South Asian Enterprises Ltd.	0																																				
	Daya Mehrotra	0																																				
	Ramji Mehrotra	0																																				
	Pragati Moulders Ltd.	0																																				
	<b>'Total'</b>	<b>17662236</b>																																				
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, Calcutta Stock Exchange Ltd. The National Stock Exchange of India Ltd.																																				
Details of the acquisition / disposal as follows	:	<table border="1"> <thead> <tr> <th>Number</th> <th>% w.r.t. total share/voting capital wherever applicable (*)</th> <th>% w.r.t. total diluted share/ voting capital of the TC (**)</th> </tr> </thead> </table>	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/ voting capital of the TC (**)																																	
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:			
a)	Shares carrying voting rights @	485783	1.256%
b)	Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NIL	NIL
c)	Voting rights (VR) otherwise than by shares	NIL	NIL
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)	NIL	NIL
e)	Total (a+b+c+d)	485783	1.256%

Details of acquisition/sale			
a)	Shares carrying voting rights-acquired/sold	0	0.000%
b)	VRs acquired /sold otherwise than by shares	NIL	NIL
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.	NIL	NIL
d)	Shares encumbered/ invoked / released by the acquirer	NIL	NIL
e)	Total (a+b+c+-d)	0	0.000%

a)	Shares carrying voting rights \$	485783	1.396%
b)	Shares encumbered with the acquirer	NIL	NIL
c)	VRs otherwise than by shares	NIL	NIL
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	NIL	NIL
e)	Total (a+b+c+d)	485783	1.396%

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	:	3866025 Equity Shares Bought back by the Company from Open Market through Stock Exchange Route
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	:	<i>Date of Extinguishment of share bought back 02/02/2023, 06/03/2023, 29/03/2023, 08/05/2023 and 26/05/2023</i>
Equity share capital / total voting capital of the TC before the said acquisition /sale	:	Rs. 38,78,42,420 (Total paid-up capital) 3,86,62,017 Equity shares (Total Voting capital)
Equity share capital/ total voting capital of the TC after the said acquisition / sale	:	Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)
Total diluted share/voting capital of the TC after the said acquisition/sale.	:	Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31(1)(b) of the listing regulations.

(\*\*) 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.

@ Percentage calculated on before buyback voting capital i.e. 38662017 equity shares.  
\$ Percentage calculated on post buyback voting capital i.e. 34795992 equity shares.

**SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011**

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

Name of the Target Company (TC)	: VLS Finance Ltd.
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	: VLS Capital Ltd.
	Divya Mehrotra 541393
	VLS Commodities Pvt. Ltd. 430468
	Sadhana Mehrotra 884691
	Vikas Mehrotra 485783
	Mahesh Prasad Mehrotra (HUF) 1984262
	VLS Capital Ltd. 13335638
	Mahesh Prasad Mehrotra 1
	South Asian Enterprises Ltd. 0
	Daya Mehrotra 0
	Ranji Mehrotra 0
	Pragati Moulders Ltd. 0
	<b>'Total' 17662236</b>

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, Calcutta Stock Exchange Ltd. The National Stock Exchange of India Ltd.

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/sale under consideration, holding of :			
a)	Shares carrying voting rights @	13335638	34.493%
b)	Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NIL	NIL
c)	Voting rights (VR) otherwise than by shares	NIL	NIL
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)	NIL	NIL
e)	Total (a+b+c+d)	13335638	34.493%

Details of acquisition/sale			
a)	Shares carrying voting rights-acquired/sold	0	0.000%
b)	VRs acquired /sold otherwise than by shares	NIL	NIL
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.	NIL	NIL
d)	Shares encumbered/ invoked / released by the acquirer	NIL	NIL
e)	Total (a+b+c+d)	0	0.000%

a)	Shares carrying voting rights \$	13335638	38.325%
b)	Shares encumbered with the acquirer	NIL	NIL
c)	VRs otherwise than by shares	NIL	NIL
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	NIL	NIL
e)	Total (a+b+c+d)	13335638	38.325%

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	: 3866025 Equity Shares Bought back by the Company from Open Market through Stock Exchange Route
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	: Date of Extinguishment of share bought back 02/02/2023, 06/03/2023, 29/03/2023, 08/05/2023 and 26/05/2023
Equity share capital / total voting capital of the TC before the said acquisition /sale	: Rs. 38,78,42,420 (Total paid-up capital) 3,86,62,017 Equity shares (Total Voting capital)
Equity share capital/ total voting capital of the TC after the said acquisition / sale	: Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)
Total diluted share/voting capital of the TC after the said acquisition/sale.	: Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31(1)(b) of the listing regulations.

(\*\*) 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.

@ Percentage calculated on before buyback voting capital i.e. 38662017 equity shares.  
\$ Percentage calculated on post buyback voting capital i.e. 34795992 equity shares.

For **VLS CAPITAL LTD**

*Deepti*

VLS Capital Ltd. **Managing Director**

Date: 31-05-2023  
Place: New Delhi

**SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011**

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

Name of the Target Company (TC)	: VLS Finance Ltd.
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	: VLS Commodities Pvt. Ltd.
	Divya Mehrotra 541393
	VLS Commodities Pvt. Ltd. 430468
	Sadhana Mehrotra 884691
	Vikas Mehrotra 485783
	Mahesh Prasad Mehrotra (HUF) 1984262
	VLS Capital Ltd. 13335638
	Mahesh Prasad Mehrotra 1
	South Asian Enterprises Ltd. 0
	Daya Mehrotra 0
	Ramji Mehrotra 0
	Pragati Moulders Ltd. 0
	<b>Total 17662236</b>
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, Calcutta Stock Exchange Ltd. The National Stock Exchange of India Ltd.
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/sale under consideration, holding of:				
a)	Shares carrying voting rights @	430468	1.113%	1.113%
b)	Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NIL	NIL	NIL
c)	Voting rights (VR) otherwise than by shares	NIL	NIL	NIL
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)	NIL	NIL	NIL
e)	Total (a+b+c+d)	430468	1.113%	1.113%

Details of acquisition/sale				
a)	Shares carrying voting rights-acquired/sold	0	0.000%	0.000%
b)	VRs acquired /sold otherwise than by shares	NIL	NIL	NIL
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.	NIL	NIL	NIL
d)	Shares encumbered/ invoked / released by the acquirer	NIL	NIL	NIL
e)	Total (a+b+c+-d)	0	0.000%	0.000%

a)	Shares carrying voting rights \$	430468	1.237%	1.237%
b)	Shares encumbered with the acquirer	NIL	NIL	NIL
c)	VRs otherwise than by shares	NIL	NIL	NIL
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	NIL	NIL	NIL
e)	Total (a+b+c+d)	430468	1.237%	1.237%

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	: 3866025 Equity Shares Bought back by the Company from Open Market through Stock Exchange Route
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	: Date of Extinguishment of share bought back 02/02/2023, 06/03/2023, 29/03/2023, 08/05/2023 and 26/05/2023
Equity share capital / total voting capital of the TC before the said acquisition /-sale	: Rs. 38,78,42,420 (Total paid-up capital) 3,86,62,017 Equity shares (Total Voting capital)
Equity share capital/ total voting capital of the TC after the said acquisition / sale	: Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)
Total diluted share/voting capital of the TC after the said acquisition/sale.	: Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)

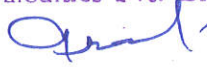
(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31(1)(b) of the listing regulations.

(\*\*) 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.

@ Percentage calculated on before buyback voting capital i.e. 38662017 equity shares.

\$ Percentage calculated on post buyback voting capital i.e. 34795992 equity shares.

For VLS Commodities Pvt. Ltd.

  
**Director**

VLS Commodities Pvt. Ltd.

Date: 31-05-2023

Place: New Delhi

**SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011**

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

Name of the Target Company (TC)	VLS Finance Ltd.		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	South Asian Enterprises Ltd.	Divya Mehrotra	541393
		VLS Commodities Pvt. Ltd.	430468
		Sadhana Mehrotra	884691
		Vikas Mehrotra	485783
		Mahesh Prasad Mehrotra (HUF)	1984262
		VLS Capital Ltd.	13335638
		Mahesh Prasad Mehrotra	1
		South Asian Enterprises Ltd.	0
		Daya Mehrotra	0
		Ramji Mehrotra	0
		Pragati Moulders Ltd.	0
		<b>'Total'</b>	<b>17662236</b>
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, Calcutta Stock Exchange Ltd. The National Stock Exchange of India Ltd.		
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/sale under consideration, holding of :			
a)	Shares carrying voting rights @	0	0.000%
b)	Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NIL	NIL
c)	Voting rights (VR) otherwise than by shares	NIL	NIL
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)	NIL	NIL
e)	<b>Total (a+b+c+d)</b>	<b>0</b>	<b>0.000%</b>

Details of acquisition/sale			
a)	Shares carrying voting rights-acquired/sold	0	0.000%
b)	VRs acquired /sold otherwise than by shares	NIL	NIL
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.	NIL	NIL
d)	Shares encumbered/ invoked / released by the acquirer	NIL	NIL
e)	<b>Total (a+b+c+d)</b>	<b>0</b>	<b>0.000%</b>

a)	Shares carrying voting rights \$	0	0.000%
b)	Shares encumbered with the acquirer	NIL	NIL
c)	VRs otherwise than by shares	NIL	NIL
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	NIL	NIL
e)	<b>Total (a+b+c+d)</b>	<b>0</b>	<b>0.000%</b>

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	3866025 Equity Shares Bought back by the Company from Open Market through Stock Exchange Route
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	Date of Extinguishment of share bought back 02/02/2023, 06/03/2023, 29/03/2023, 08/05/2023 and 26/05/2023
Equity share capital / total voting capital of the TC before the said acquisition /sale	Rs. 38,78,42,420 (Total paid-up capital) 3,86,62,017 Equity shares (Total Voting capital)
Equity share capital/ total voting capital of the TC after the said acquisition / sale	Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)
Total diluted share/voting capital of the TC after the said acquisition/sale.	Rs. 34,91,82,170 (Total paid-up capital) 3,47,95,992 Equity shares (Total Voting capital)

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31(1)(b) of the listing regulations.

(\*\*) 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.

@ Percentage calculated on before buyback voting capital i.e. 38662017 equity shares.  
\$ Percentage calculated on post buyback voting capital i.e. 34795992 equity shares.

South Asian Enterprises Ltd.



Date: 31-05-2023  
Place: New Delhi