



October 1, 2020

BSE Limited
Corporate Relationship Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400001

Scrip Code: 500456

Sub: Disclosure under Regulation 10(7) in respect of inter-se transfer of shares between immediate relatives under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Dear Sir/Madam,

In accordance with the provisions of Regulation 10(7) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, please find enclosed herewith the report, as received from the acquirer – Mr. Vineet Jain, in respect of the following acquisition of 1,12,20,000 equity shares (12.59%) of **Pasupati Acrylon Limited** by way of gift.

Name of the Transferor/Seller (Donor)	Name of the Transferee/Acquirer (Donee)	No. of shares acquired	% of shareholding acquired	Date of acquisition
Mr. Manish Jain	Mr. Vineet Jain	1,12,20,000	12.59%	15.09.2020

The above transaction is an inter-se transfer of shares between immediate relatives in terms of Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

However, there is no change in the aggregate shareholding of Promoter and Promoter Group pre & post the above inter-se transfer.

This is for your information and records.

Thanking You,

Yours faithfully,

For Pasupati Acrylon Limited

Bharat Kapoor
Company Secretary & Compliance Officer

PASUPATI ACRYLON LTD.

Encl: As above

October 1, 2020

Securities & Exchange Board of India

Plot No. C4-A, "G" Block
Bandra Kurla Complex
Bandra (East)
Mumbai – 400051

Scrip Code: 500456

Sub: Report under Regulation 10(7) in respect of inter-se transfer of shares of Pasupati Acrylon Limited between immediate relatives under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Dear Sir/Madam,

I wish to inform you that I, the undersigned, being one of the promoter of **Pasupati Acrylon Limited** ("the Company") have acquired 1,12,20,000 equity shares of the Company by way of gift from my brother - Mr. Manish Jain, who also forms part of the promoter group. The details of acquisition are as follows:

Name of Transferor/Seller (Donor)	Name of Transferee/ Acquirer (Donee)	No. of shares acquired	% of shareholding	Date of acquisition
Mr. Manish Jain	Mr. Vineet Jain	1,12,20,000	12.59%	15.09.2020

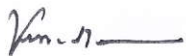
The above transaction is an inter-se transfer of shares between immediate relatives in terms of Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. However, there is no change in the aggregate shareholding of Promoter and Promoter Group before and after the above inter-se transfer.

In this connection, please find enclosed herewith:

1. Report under Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, in respect of the aforesaid acquisition of equity shares of **Pasupati Acrylon Limited**.
2. Demand Draft No. 7265 dated 30.09.2020 drawn on Bank of Baroda, Connaught Place, New Delhi, for Rs. 1,50,000/- in favour of 'Securities and Exchange Board of India' payable at Mumbai, towards fees pursuant to the said regulation.

Kindly take this on your record and acknowledge the receipt of the same.

Yours faithfully,



Vineet Jain
Acquirer & Promoter

Encl: As above

C.C. **Company Secretary & Compliance Officer**
Pasupati Acrylon Limited
Regd Office:
Thakurdwara
Kashipur Road
Dist. Moradabad (U.P.) - 244601

BSE Limited
Corporate Relationship Department
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai – 400001

**Format under Regulation 10(7) – Report to SEBI in respect of any acquisition made in
reliance upon exemption provided for in regulation 10(1)(a) of SEBI (Substantial
Acquisition of Shares and Takeovers) Regulations, 2011**

1 General Details		
a.	Name, address, telephone, no., e-mail of Acquirer(s) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond.}	Name: Vineet Jain Address: 25, Friends Colony (West), New Delhi - 110065 Email Id: garvi_07@yahoo.com Mobile No.: 011-47627400
b.	Whether sender is the acquirer (Y/N)	Y
c.	If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization)	Not Applicable
d.	Name, address, Tel. no. and e-mail of sender, if the sender is not the acquirer	Not Applicable
2 Compliance of Regulation 10(7)		
a.	Date of report	01.10.2020
b.	Whether report has been submitted to SEBI within 21 working days from the date of the acquisition	Yes
c.	Whether the report is accompanied with fees as required under Regulation 10(7)	Yes, applicable fees of Rs. 1,50,000/- is enclosed vide DD No. 7265 dated 30.09.2020 drawn on Bank of Baroda, Connaught Place, New Delhi
3 Compliance of Regulation 10(5)		
a.	Whether the report has been filed with the Stock Exchanges, where the shares of the Company are listed, at least 4 working days before the date of proposed acquisition.	Yes, Copy of the same is enclosed as Annexure - 1
b.	Date of Report	7th September, 2020
4 Compliance of Regulation 10(6)		
a.	Whether the report has been filed with the Stock Exchanges, where the shares of the Company are listed, within 4 working days of the acquisition	Yes, Copy of the same is enclosed as Annexure - 2
b.	Date of Report	16th September, 2020
5 Details of the Target Company (TC)		
a.	Name & address of TC	Pasupati Acrylon Limited Regd. Office: Thakurdwara, Kashipur Road, Dist. Moradabad Corp Office: M - 14, Middle Circle, Connaught Circus, New Delhi - 110001
b.	Name of the Stock Exchange(s) where the shares of the TC are listed	BSE Limited

Kan. M

6 Details of the acquisition					
a.	Date of acquisition	15th September, 2020			
b.	Acquisition price per share (in Rs.)	Nil (Inter-se transfer of shares between immediate relatives by way of gift without any consideration).			
c.	Regulation, which would have been triggered an open offer, had the report not been filed under Regulation 10(7). (Whether Regulation 3(1), 3(2), 4 or 5).	Regulation 3(2) of SEBI (Substantial Acquisition of Shares And Takeovers) Regulations, 2011			
d.	Shareholding of acquirer(s) and PACs individually in TC (in terms of no. & as a percentage of total share/voting capital of the TC (*))	Before the acquisition		After the acquisition	
		No. of shares	% w.r.t total share capital of the TC	No. of shares	% w.r.t total share capital of the TC
	Name of the Acquirer (**) - Mr. Vineet Jain	12,02,422	1.35	1,24,22,422	13.94
	PACs	Annexure - 3			
e.	Shareholding of seller(s) in TC (in terms of no. & as a percentage of total share/voting capital of the TC (*))	Before the acquisition		After the acquisition	
		No. of shares	% w.r.t total share capital of the TC	No. of shares	% w.r.t total share capital of the TC
	Name of Transferor/seller (**) - Mr. Manish Jain	1,56,49,232	17.56	44,29,232	4.97
7 Information specific to the exemption category to which the instant acquisition belongs Regulation 10(1)(a)(i)					
a.	Provide the name of seller(s)	Mr. Manish Jain			
b.	Specify the relationship between the acquirer(s) and seller(s)	Mr. Vineet Jain ("Acquirer") and Mr. Manish Jain ("transferor") are immediate relatives (Brothers) and are a part of the Promoter and Promoter Group of TC.			
c.	Confirm whether the acquirer(s) and the seller(s) are 'immediate relatives' as defined in the Regulation 2(l).	Yes, I hereby confirm that Acquirer and Seller/transferor are immediate relatives <i>i.e.</i> Brothers.			
d.	If shares are frequently traded, volume-weighted average market price (VWAP) for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	Nil (as shares are transferred between immediate relatives and promoters by way of gift without any consideration).			
e.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of Regulation 8.	Not Applicable			
f.	Confirm whether the acquisition price per share is not higher by more than 25% of the price as calculated in (d) or (e) above as applicable.	Not Applicable, as the acquisition of shares is done by way of gift and as such, no consideration or price is involved.			

Vineet Jain

g.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	7th September, 2020
h.	Whether the acquirer(s) as well as seller(s) have complied with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). If yes, specify applicable regulation(s) as well as date on which the requisite disclosures were made along with the copies of the same.	<p>Yes</p> <p>The acquirer - Mr. Vineet Jain and Seller - Mr. Manish Jain have complied with the provisions of Chapter V of Takeover Regulations.</p> <p>Requisite disclosures under Regulation 29(1) and 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 were filed with BSE Limited on 16th September, 2020 (Enclosed as Annexure - 4).</p>
i.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a)(i) with respect to exemptions has been duly complied with.	I hereby declare that all the conditions specified under Regulation 10(1)(a)(i) with respect to exemptions has been duly complied with.

I hereby declare that the information provided in the instant report is true and nothing has been concealed there from.



Vineet Jain
(Acquirer and Promoter)

Place: New Delhi
Date: 01.10.2020

Note:
(**) Shareholding of each entity shall be shown separately as well as collectively.



बैंक ऑफ़ बड़ौदा
Bank of Baroda

बी-3 कनाउट सर्कस, नई दिल्ली - ११०००१
B-3 CONNAUGHT CIRCUS, NEW DELHI - 110001

00950015181192

डिमांड DEMAND
ड्राफ्ट DRAFT

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एह OT 9
दह TT 8
एला OL 7
रुना 6

मांगे जानेपर securities and exchange board of India या उनके आदेश पर
On Demand Pay Or Order
रुपये * one lakh fifty thousand only
Rupees ₹ 150000/-
अदा करें

मूल्य प्राप्त हुआ / FOR VALUE RECEIVED

SERBOM

7265

अदाकर्ता शाखा / Drawee Branch

DD/2012/TF अल्फा कूट ALPHA CODE
(DD Alpha Prefix) C O N N A U

कृते बैंक ऑफ़ बड़ौदा
For Bank of Baroda

संयुक्त प्रबंधक / Joint Manager
104595

शाखा प्रबंधक / Branch Manager
100542

ह.स.न. / S.S. NO. (

) ह.स.न. / S.S. NO. (

007265 0000 12000 200095 16

ANNEXURE - 1

September 7, 2020

BSE Limited
Corporate Relationship Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400001

Scrip Code: 500456

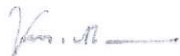
Sub: Intimation under Regulation 10(5) in respect of proposed inter-se transfer of shares between immediate relatives in terms of Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Dear Sir/Madam,

I, the undersigned, hereby submit the requisite intimation under Regulation 10(5), in respect of proposed acquisition of 1,12,20,000 equity shares of Pasupati Acrylon Limited in terms of Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

This is for your information and records.

Thanking You,



Vineet Jain

C.C. The Company Secretary
Pasupati Acrylon Limited
Corp Office:
M – 14, Connaught Circus
Middle Circle
New Delhi – 110001

Format for Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

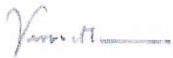
1.	Name of the Target Company (TC)	Pasupati Acrylon Limited
2.	Name of the acquirer(s)	Vineet Jain
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes, Acquirer is part of the promoter and promoter group of TC
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Mr. Manish Jain
	b. Proposed date of acquisition	At any time after 4 working days from the date of this intimation i.e. on or after 14th September, 2020.
	c. Number of shares to be acquired from each person mentioned in 4(a) above	1,12,20,000 equity shares from Mr. Manish Jain.
	d. Total shares to be acquired as % of share capital of TC	1,12,20,000 equity shares constituting 12.59% of total share capital of TC.
	e. Price at which shares are proposed to be acquired	Nil as the acquisition is being done by way of gift without any consideration.
	f. Rationale, if any, for the proposed transfer	Inter-se transfer of shares between "qualifying persons" being immediate relatives and promoters by way of gift without any consideration.
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011. Mr. Vineet Jain ("Acquirer") and Mr. Manish Jain ("transferor") are qualifying persons being immediate relatives (Brothers).
6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.	Not Applicable, as the acquisition of shares is being done by way of gift without any consideration.
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of Regulation 8.	Not Applicable
8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	Not Applicable, as the acquisition of shares is being done by way of gift and as such, no consideration or price is involved.
9.	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997).	I hereby declare that the Transferor and Transferee have complied /will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulation, 1997).

Vineet Jain

10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	I hereby declare that all the conditions specified under Regulation 10(1)(a) with respect to exemptions has been duly complied with.			
11.	Shareholding details	Before the proposed transaction		After the proposed transaction	
		No. of shares/ voting rights	% w.r.t total share capital of TC	No. of shares/ voting rights	% w.r.t total share capital of TC
a	Acquirer(s) and PACs (other than sellers)(*)				
	Acquirer - Mr. Vineet Jain	12,02,422	1.35	1,24,22,422	13.94
	PACs (Other than seller)	4,18,63,791	46.96	4,18,63,791	46.96
	Total of Acquirer(s) and PACs (other than sellers)(*) (Refer Annexure-A)	4,30,66,213	48.31	5,42,86,213	60.90
b	Seller/Gift by Mr. Manish Jain	1,56,49,232	17.56	44,29,232	4.97

Note: (*) Shareholding of each entity may be shown separately and then collectively in a group.

The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.



Vineet Jain

Place: New Delhi

Date: 07.09.2020

Annexure - A

Shareholding of Acquirer(s) and PACS (other than seller)

Shareholding Details		Before the proposed transaction		After the proposed transaction	
		No. of shares/ voting rights	% w.r.t total share capital of TC	No. of shares/ voting rights	% w.r.t total share capital of TC
a.	Acquirer(s) and PACs (other than sellers)(*):				
	Acquirer/Transferee:				
	Vineet Jain	12,02,422	1.35	1,24,22,422	13.94
	PACs (other than sellers)				
1	Gurukripa Finvest Private Limited	90,00,000	10.10	90,00,000	10.10
2	Sulabh Plantation & Finance Private Limited	82,50,000	9.25	82,50,000	9.25
3	Arihant Exports Limited	46,27,867	5.19	46,27,867	5.19
4	Shubh Exim Limited	45,00,000	5.05	45,00,000	5.05
5	The Pradeshiya Industrial And Investment Corporation of UP Ltd.	44,81,752	5.03	44,81,752	5.03
6	Sind-Wave Finance Services Private Limited	40,00,000	4.49	40,00,000	4.49
7	Prabhat Capial Services Limited	35,00,000	3.92	35,00,000	3.92
8	Accurex Traders Private Limited	17,50,000	1.96	17,50,000	1.96
9	Inder Overseas Private Limited	10,00,000	1.12	10,00,000	1.12
10	Vinod Kumar Jain HUF	6,03,342	0.68	6,03,342	0.68
11	MVA Finance Private Limited	1,44,450	0.16	1,44,450	0.16
12	Nityanand Exports and Consultants Company Limited	6,380	0.01	6,380	0.01
	Total	4,30,66,213	48.31	5,42,86,213	60.90



Vineet Jain

Place: New Delhi

Date: 07.09.2020

ANNEXURE 2

September 16, 2020

BSE Limited
Corporate Relationship Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400001

Scrip Code: 500456

Sub: Intimation under Regulation 10(6) in respect of acquisition of shares from immediate relative under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Dear Sir/Madam,

Please find enclosed herewith the requisite intimation under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, in respect of the acquisition of 1,12,20,000 equity shares of **Pasupati Acrylon Limited** by way of gift from my brother – Mr. Manish Jain, in terms of Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

This is for your information and records.

Thanking You,

VINEET JAIN

Digitally signed by VINEET
JAIN
Date: 2020.09.16 12:28:57
+05'30'

Vineet Jain
Acquirer and Promoter

C.C. Company Secretary and Compliance Officer
Pasupati Acrylon Limited
Corp Office:
M – 14, Connaught Circus
Middle Circle
New Delhi – 110001

Format for Disclosures under Regulation 10(6) – Report to Stock Exchanges in respect of acquisition made in reliance upon exemption provided for in under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	Pasupati Acrylon Limited	
2.	Name of the acquirer(s)	Mr. Vineet Jain	
3.	Name of the stock exchange where shares of the TC are listed	BSE Limited	
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Inter-se transfer of shares between immediate relatives and promoters by way of gift without any consideration.	
5.	Relevant regulation under which the acquirer is exempted from making open offer	Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.	
6.	Whether disclosure of proposed acquisition was required to be made under regulation 10 (5) and if so, - whether disclosure was made and whether it was made within the timeline specified under the regulations - date of filing with the stock exchange	Yes Yes 7th September, 2020	
7.	Details of acquisition	Disclosures required to be made under Regulation 10(5)	Whether the disclosures under Regulation 10(5) are actually made
	a. Name of the transferor / seller	Mr. Manish Jain	Yes
	b. Date of acquisition	At any time after 4 working days from the date of intimation under Regulation 10(5) i.e. on or after 14th September, 2020.	Actual acquisition is made on 15th September, 2020
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	1,12,20,000 Equity Shares	1,12,20,000 Equity Shares
	d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	1,12,20,000 equity shares constituting 12.59% of total share capital of TC.	1,12,20,000 equity shares constituting 12.59% of total share capital of TC.

Digitally signed by
VINEET JAIN
 VINEET JAIN
 Date: 2020.09.16
 12:29:22 +05'30'

	e Price at which shares are proposed to be acquired / actually acquired	Nil (as Inter-se transfer between immediate relatives and promoters by way of gift without any consideration)		Nil (as Inter-se transfer between immediate relatives and promoters by way of gift without any consideration)	
8.	Shareholding details	Pre-Transaction		Post-Transaction	
		No. of shares held	% w.r.t total share capital of TC	No. of shares held	% w.r.t total share capital of TC
a	Each Acquirer / Transferee(*) Mr. Vineet Jain	12,02,422	1.35	1,24,22,422	13.94
b	Each Seller / Transferor Mr. Manish Jain	1,56,49,232	17.56	44,29,232	4.97

Note: (*) Shareholding of each entity may be shown separately and then collectively in a group.

The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.

VINEET JAIN
Digitally signed by VINEET JAIN
Date: 2020.09.16 12:29:41 +05'30'

Vineet Jain
(Acquirer)

Place: New Delhi
Date: 16.09.2020

Shareholding of Acquirer(s) and PACs

Annexure - 3

Shareholding Details	Pre-transaction				Transaction				Post-transaction			
	No. of shares/ voting rights	% w.r.t total share capital	% w.r.t total diluted share capital		No. of shares/ voting rights	% w.r.t total share capital	% w.r.t total diluted share capital		No. of shares/ voting rights	% w.r.t total share capital of TC	% w.r.t total diluted share capital	
a. Acquirer/Transferee (Donee) :												
Vineet Jain	12,02,422	1.35	1.35		1,12,20,000	12.59	12.59		1,24,22,422	13.94	13.94	
b. Seller/Transferor (Donor) :												
Manish Jain	1,56,49,232	17.56	17.56		-1,12,20,000	-12.59	-12.59		44,29,232	4.97	4.97	
c. Other PACs :												
1 Gurukripa Finvest Private Limited	90,00,000	10.10	10.10		-	-	-		90,00,000	10.10	10.10	
2 Sulabh Plantation & Finance Private Limited	82,50,000	9.25	9.25		-	-	-		82,50,000	9.25	9.25	
3 Arihant Exports Limited	46,27,867	5.19	5.19		-	-	-		46,27,867	5.19	5.19	
4 Shubb Exim Limited	45,00,000	5.05	5.05		-	-	-		45,00,000	5.05	5.05	
5 The Pradeshya Industrial And Investment Corporation of UP Ltd.	44,81,752	5.03	5.03		-	-	-		44,81,752	5.03	5.03	
6 Sind-Wave Finance Services Private Limited	40,00,000	4.49	4.49		-	-	-		40,00,000	4.49	4.49	
7 Prabhath Capital Services Limited	35,00,000	3.92	3.92		-	-	-		35,00,000	3.92	3.92	
8 Accurex Traders Private Limited	17,50,000	1.96	1.96		-	-	-		17,50,000	1.96	1.96	
9 Inder Overseas Private Limited	10,00,000	1.12	1.12		-	-	-		10,00,000	1.12	1.12	
10 Vinod Kumar Jain HUF	6,03,342	0.68	0.68		-	-	-		6,03,342	0.68	0.68	
11 MVA Finance Private Limited	1,44,450	0.16	0.16		-	-	-		1,44,450	0.16	0.16	
12 Nityanand Exports and Consultants Company Limited	6,380	0.01	0.01		-	-	-		6,380	0.01	0.01	
Total	5,87,15,445	65.87	65.87		-	-	-		5,87,15,445	65.87	65.87	



Vineet Jain

Acquirer and Promoter

Place: New Delhi

Date: 01.10.2020

ANNEXURE-4

September 16, 2020

BSE Limited
Corporate Relationship Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400001

Scrip Code: 500456

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

Dear Sir/Madam,

Please find enclosed herewith the disclosure under Regulation 29(1) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, with regard to acquisition of 1,12,20,000 equity shares of **Pasupati Acrylon Limited** by way of gift.

This is for your information and records:

Thanking You,

Yours faithfully,

VINEET JAIN Digitally signed by VINEET JAIN
Date: 2020.09.16 12:46:33
+05'30'

VINEET JAIN
Acquirer and Promoter

C.C. Company Secretary & Compliance Officer
Pasupati Acrylon Limited
Regd. Office:
Thakurdwara
Kashipur Road
Dist. Moradabad (U.P.) - 244601

Disclosures under Regulation 29(1) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Part-A- Details of the Acquisition

Name of the Target Company (TC)	Pasupati Acrylon Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Vineet Jain (Acquirer)		
	Other PACs:		
	Manish Jain (Transferor)		
	Gurukripa Finvest Private Limited		
	Sulabh Plantation & Finance Private Limited		
	Arihant Exports Limited		
	Shubh Exim Limited		
	The Pradeshiya Industrial And Investment Corporation of UP Ltd.		
	Sind-Wave Finance Services Private Limited		
	Prabhat Capial Services Limited		
	Accurex Traders Private Limited		
	Inder Overseas Private Limited		
	Vinod Kumar Jain HUF		
MVA Finance Private Limited			
Nityanand Exports and Consultants Company Limited			
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 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 under consideration, holding of acquirer along with PACs of:			
a) Shares carrying voting rights	12,02,422 (individually)	1.35	1.35
Refer Annexure - A	5,87,15,445 (Together with PACs)	65.87	65.87
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
c) Voting rights (VR) otherwise than by equity 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) (individually)	12,02,422	1.35	1.35
Total (a+b+c+d) (alongwith PACs)	5,87,15,445	65.87	65.87

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Details of acquisition	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
a) Shares carrying voting rights acquired	1,12,20,000	12.59	12.59
b) Voting Rights (VRs) acquired otherwise than by equity 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 required)	-	-	-
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
e) Total (a+b+c+d)	1,12,20,000	12.59	12.59
After the acquisition, holding of acquirer along with PACs of:	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
a) Shares carrying voting rights acquired	1,24,22,422 (individually)	13.94	13.94
Refer Annexure - A	5,87,15,445 (Together with PACs)	65.87	65.87
b) Voting Rights (VRs) otherwise than by equity 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 required) after acquisition	-	-	-
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
e) Total (a+b+c+d) (individually)	1,24,22,422	13.94	13.94
Total (a+b+c+d) (alongwith PACs)	5,87,15,445	65.87	65.87
Mode of acquisition (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer/encumbrance, etc.)	Inter-se transfer between immediate relatives and promoters by way of gift without any consideration		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	Not Applicable as the Equity shares are acquired.		
Date of acquisition of/ date of receipt of intimation of allotment of shares / VR / warrants/ convertible securities/ any other instrument that entitles the acquirer to receive shares in the TC.	15th September, 2020		
Equity share capital / total voting capital of the TC before the said acquisition	8,91,33,121 Equity Shares of Rs. 10/- each		
Equity share capital/ total voting capital of the TC after the said acquisition	8,91,33,121 Equity Shares of Rs. 10/- each		
Total diluted share/voting capital of the TC after the said acquisition	8,91,33,121 Equity Shares of Rs. 10/- each		

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Acquirer and Promoter

Place: New Delhi

Date: 16.09.2020

Shareholding of Acquirer(s) and PACS

Shareholding Details		Pre-transaction			Transaction			Post-transaction		
		No. of shares/ voting rights	% w.r.t total share capital	% w.r.t total diluted share capital	No. of shares/ voting rights	% w.r.t total share capital	% w.r.t total diluted share capital	No. of shares/ voting rights	% w.r.t total share capital of TC	% w.r.t total diluted share capital
a.	Acquirer/Transferee (Donee) :									
	Vineet Jain	12,02,422	1.35	12.59	1,12,20,000	12.59	12.59	1,24,22,422	13.94	13.94
b.	Seller/Transferor (Donor) :									
	Manish Jain	1,56,49,232	17.56	-12.59	-1,12,20,000	-12.59	-12.59	44,29,232	4.97	4.97
c.	Other PACs :									
1	Gurukripa Finvest Private Limited	90,00,000	10.10	10.10	-	-	-	90,00,000	10.10	10.10
2	Sulabh Plantation & Finance Private Limited	82,50,000	9.25	9.25	-	-	-	82,50,000	9.25	9.25
3	Arihant Exports Limited	46,27,867	5.19	5.19	-	-	-	46,27,867	5.19	5.19
4	Shubh Exim Limited	45,00,000	5.05	5.05	-	-	-	45,00,000	5.05	5.05
5	The Pradeshya Industrial And Investment Corporation of UP Ltd.	44,81,752	5.03	5.03	-	-	-	44,81,752	5.03	5.03
6	Sind-Wave Finance Services Private Limited	40,00,000	4.49	4.49	-	-	-	40,00,000	4.49	4.49
7	Prabhat Capial Services Limited	35,00,000	3.92	3.92	-	-	-	35,00,000	3.92	3.92
8	Accurex Traders Private Limited	17,50,000	1.96	1.96	-	-	-	17,50,000	1.96	1.96
9	Inder Overseas Private Limited	10,00,000	1.12	1.12	-	-	-	10,00,000	1.12	1.12
10	Vinod Kumar Jain HUF	6,03,342	0.68	0.68	-	-	-	6,03,342	0.68	0.68
11	MVA Finance Private Limited	1,44,450	0.16	0.16	-	-	-	1,44,450	0.16	0.16
12	Nityanand Exports and Consultants Company Limited	6,380	0.01	0.01	-	-	-	6,380	0.01	0.01
	Total	5,87,15,445	65.87	65.87	-	-	-	5,87,15,445	65.87	65.87

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Vineet Jain
Acquirer and Promoter

Place: New Delhi
Date: 16.09.2020

Part-B

Name of the Target Company

Pasupati Acrylon Limited

Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Whether the acquirer belongs to Promoter/Promoter group	PAN of the person and PACs
Acquirer/Transferee (Donee):		
(1) Vineet Jain	Yes	AAFPJ7478L
Seller/Transferor (Donor):		
(2) Manish Jain	Yes	AADPJ8524F
PACs:		
(3) Vinod Kumar Jain HUF	Yes	AAAHV2404F
(4) Arihant Exports Limited	Yes	AAACA0143P
(5) Accurex Traders Private Limited	Yes	AACCA1330J
(6) Sulabh Plantation & Finance Private Limited	Yes	AACCS2207C
(7) Sind-Wave Finance Services Private Limited	Yes	AAGCS2744C
(8) Prabhat Capial Services Limited	Yes	AACCP6531C
(9) Shubh Exim Limited	Yes	AABCS8094E
(10) Gurukripa Finvest Private Limited	Yes	AAACG4045J
(11) Inder Overseas Private Limited	Yes	AAACI1230K
(12) Nityanand Exports and Consultants Company Limited	Yes	AAACN1386P
(13) MVA Finance Private Limited	Yes	AAACM1452D
(14) The Pradeshiya Industrial And Investment Corporation of UP Ltd.	Yes	AAACT6517A

Note:

(*) 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 SEBI (Listing Obligations and Disclosure Requirements) 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.

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VINEET JAIN
Acquirer and Promoter

Place: New Delhi
Date: 16.09.2020

September 16, 2020

BSE Limited
Corporate Relationship Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400001

Scrip Code: 500456

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

Dear Sir/Madam,

I, Manish Jain, being one of the members of the Promoter Group of **Pasupati Acrylon Limited** ("the Company") hereby submit the requisite disclosure in terms of Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, with regard to change in my shareholding in view of inter-se transfer (disposal) of 1,12,20,000 equity shares of the Company to my brother – Mr. Vineet Jain by way of gift.

This is for your information and records.

Thanking You,

Yours faithfully,

MANISH Digitally signed
JAIN by MANISH JAIN
Date: 2020.09.16
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MANISH JAIN
(Transferor/Seller)

C.C. **Company Secretary & Compliance Officer**
Pasupati Acrylon Limited
Regd. Office:
Thakurdwara
Kashipur Road
Dist. Moradabad (U.P.) - 244601

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

Part-A- Details of the Transfer

Name of the Target Company (TC)	Pasupati Acrylon Limited		
Name(s) of the Transferor and Persons Acting in Concert (PAC) with the transferor	Manish Jain (Transferor)		
	Other PACs:		
	Vineet Jain (Acquirer)		
	Gurukripa Finvest Private Limited		
	Sulabh Plantation & Finance Private Limited		
	Arihant Exports Limited		
	Shubh Exim Limited		
	The Pradeshiya Industrial And Investment Corporation of UP Ltd.		
	Sind-Wave Finance Services Private Limited		
	Prabhat Capial Services Limited		
	Accurex Traders Private Limited		
	Inder Overseas Private Limited		
	Vinod Kumar Jain HUF		
	MVA Finance Private Limited		
Nityanand Exports and Consultants Company Limited			
Whether the transferor belongs to Promoter/Promoter group	Yes, both Acquirer and Transferor are part of Promoter and Promoter Group.		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited		
Details of the transfer/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 transfer/disposal under consideration, holding of transferor alongwith PACs:			
a) Shares carrying voting rights	1,56,49,232 (Individually)	17.56	17.56
Refer Annexure - A	5,87,15,445 (Together with PACs)	65.87	65.87
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
c) Voting rights (VR) otherwise than by equity shares	-	-	-
d) Warrants/convertible securities/any other instrument that entitles the transferor to receive shares carrying voting rights in the TC (specify holding in each category)	-	-	-
e) Total (a+b+c+d) (individually)	1,56,49,232	17.56	17.56
Total (a+b+c+d) (alongwith PACs)	5,87,15,445	65.87	65.87

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Details of transfer/disposal:	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
a) Shares carrying voting rights transferred	1,12,20,000	12.59	12.59
b) Voting Rights (VRs) transferred otherwise than by equity shares	-	-	-
c) Warrants/convertible securities/any other instrument that entitles the transferor to receive shares carrying voting rights in the TC (specify holding in each category required) transferred/sold	-	-	-
d) Shares encumbered / invoked/released by the acquirer	-	-	-
e) Total (a+b+c+d)	1,12,20,000	12.59	12.59
After the transfer, holding of transferor alongwith PACs :	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
a) Shares carrying voting rights	44,29,232 (Individually)	4.97	4.97
Refer Annexure - A	5,87,15,445 (Together with PACs)	65.87	65.87
b) Shares encumbered with the transfer	-	-	-
c) Voting Rights (VRs) otherwise than by equity shares	-	-	-
d) Warrants/convertible securities/any other instrument that entitles the transferor to receive shares carrying voting rights in the TC (specify holding in each category required)after transfer	-	-	-
e) Total (a+b+c+d) (individually)	44,29,232	4.97	4.97
Total (a+b+c+d) (alongwith PACs)	5,87,15,445	65.87	65.87
Mode of sale/transfer (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer, etc.)	Inter-se transfer between immediate relatives and promoters by way of gift without any consideration		
Date of transfer / disposal/sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	15th September, 2020		
Equity share capital / total voting capital of the TC before the said transfer	8,91,33,121 Equity Shares of Rs. 10/- each		
Equity share capital/ total voting capital of the TC after the said transfer	8,91,33,121 Equity Shares of Rs. 10/- each		
Total diluted share/voting capital of the TC after the said transfer	8,91,33,121 Equity Shares of Rs. 10/- each		

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MANISH JAIN
(Transferor/Seller)
Place: New Delhi
Date: 16.09.2020

Part-B

Name of the Target Company

Pasupati Acrylon Limited

Name(s) of the Transferor and Persons Acting in Concert (PAC) with the Transferor	Whether the Transferor belongs to Promoter/Promoter group	PAN of the person and PACs
Seller/Transferor (Donor):		
(1) Manish Jain	Yes	AADPJ8524F
Acquirer/Transferee (Donee):		
(2) Vineet Jain	Yes	AAF PJ7478L
Other PACs:		
(3) Vinod Kumar Jain HUF	Yes	AAAHV2404F
(4) Arihant Exports Limited	Yes	AAACA0143P
(5) Accurex Traders Private Limited	Yes	AACCA1330J
(6) Sulabh Plantation & Finance Private Limited	Yes	AACCS2207C
(7) Sind-Wave Finance Services Private Limited	Yes	AAGCS2744C
(8) Prabhat Capital Services Limited	Yes	AACCP6531C
(9) Shubh Exim Limited	Yes	AABCS8094E
(10) Gurukripa Finvest Private Limited	Yes	AAACG4045J
(11) Inder Overseas Private Limited	Yes	AAACI1230K
(12) Nityanand Exports and Consultants Company Limited	Yes	AAACN1386P
(13) MVA Finance Private Limited	Yes	AAACM1452D
(14) The Pradeshiya Industrial And Investment Corporation of UP Ltd.	Yes	AAACT6517A

Note:

(*) 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 SEBI (Listing Obligations and Disclosure Requirements) 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.

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Transferor and PromoterPlace: New Delhi
Date: 16.09.2020

Shareholding of Transferor and PACs

Shareholding Details		Pre-transaction			Transaction			Post-transaction		
		No. of shares/ voting rights	% w.r.t total share capital	% w.r.t total diluted share capital	No. of shares/ voting rights	% w.r.t total share capital	% w.r.t total diluted share capital	No. of shares/ voting rights	% w.r.t total share capital of TC	% w.r.t total diluted share capital
a.	Acquirer/Transferee (Donee) :									
	Vineet Jain	12,02,422	1.35	1.35	1,12,20,000	12.59	12.59	1,24,22,422	13.94	13.94
b.	Seller/Transferor (Donor) :									
	Manish Jain	1,56,49,232	17.56	17.56	-1,12,20,000	-12.59	-12.59	44,29,232	4.97	4.97
c.	Other PACs :									
1	Gurukripa Finvest Private Limited	90,00,000	10.10	10.10	-	-	-	90,00,000	10.10	10.10
2	Sulabh Plantation & Finance Private Limited	82,50,000	9.25	9.25	-	-	-	82,50,000	9.25	9.25
3	Arihant Exports Limited	46,27,867	5.19	5.19	-	-	-	46,27,867	5.19	5.19
4	Shubh Exim Limited	45,00,000	5.05	5.05	-	-	-	45,00,000	5.05	5.05
5	The Pradeshiya Industrial And Investment Corporation of UP Ltd.	44,81,752	5.03	5.03	-	-	-	44,81,752	5.03	5.03
6	Sind-Wave Finance Services Private Limited	40,00,000	4.49	4.49	-	-	-	40,00,000	4.49	4.49
7	Prabhat Capital Services Limited	35,00,000	3.92	3.92	-	-	-	35,00,000	3.92	3.92
8	Accurex Traders Private Limited	17,50,000	1.96	1.96	-	-	-	17,50,000	1.96	1.96
9	Inder Overseas Private Limited	10,00,000	1.12	1.12	-	-	-	10,00,000	1.12	1.12
10	Vinod Kumar Jain HUF	6,03,342	0.68	0.68	-	-	-	6,03,342	0.68	0.68
11	MVA Finance Private Limited	1,44,450	0.16	0.16	-	-	-	1,44,450	0.16	0.16
12	Nityanand Exports and Consultants Company Limited	6,380	0.01	0.01	-	-	-	6,380	0.01	0.01
	Total	5,87,15,445	65.87	65.87	-	-	-	5,87,15,445	65.87	65.87

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Manish Jain
Transferor and Promoter

Place: New Delhi
Date: 16.09.2020