

GUARDIAN ADVISORS PVT. LTD.

03/12/2021

To,

M/s Khaitan (India) Limited	BSE Limited	The National Stock Exchange of India Ltd
20 th Floor,46C,J.L.Nehru Road,Kolkata-700071 Email:kilsugar@gmail.com Phone:033-40505000	Phiroze Jeejeebhoy Towers, Dalal Street,Fort Mumbai- 400001	"Exchange Plaza",5 th Floor,Plot No.C/1,G Block Bandra Kurla Complex, Bandra(East), Mumbai-400051

Dear Sir/ Madam

Subject- Disclosure under Regulation 29(2) of SEBI SAST Regulations.

Guardian Advisors Private Limited (GA) which is a SEBI registered portfolio manager wishes to inform the NSE, BSE and Khaitan (India) Limited that it on behalf of its clients, GA and Persons Acting in Concert has acquired further shares in the company and now holds 7.0757% equity stake in Khaitan (India) Limited under various client accounts (Attached in Annexure 1).

The ownership of the underlying asset vests with the client and GA has the power of attorney to manage these client accounts.

Please note that the clients and PAC are only acting in concert with the monies and client accounts given to the Portfolio manager to manage under the discretionary PMS and not in any other account or entity managed by themselves or any other intermediary.

Yours Sincerely



Sidharth Jain

Compliance Officer

Guardian Advisors Private Limited

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

Name of the Target Company (TC)	KHAITAN (INDIA) LTD
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	GUARDIAN ADVISORS PRIVATE LIMITED ON BEHALF OF CLIENTS ATTACHED IN ANNEXURE-I
Whether the acquirer belongs to Promoter/Promoter group	NO
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE & NSE

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 (**)
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Before the acquisition under consideration, holding of :

- | | | | |
|---|----------|---------|---------|
| a) Shares carrying voting rights | | | |
| b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others) | | | |
| c) Voting rights (VR) otherwise than by shares | 3,31,989 | 6.9892% | 6.9892% |
| d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) | | | |
| e) Total (a+b+c+d) | | | |

Details of acquisition/sale

- | | | | |
|--|-------|---------|---------|
| a) Shares carrying voting rights acquired | | | |
| b) VRs acquired /sold otherwise than by shares | 4,105 | 0.0864% | 0.0864% |
| c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold | | | |
| d) Shares encumbered / invoked/released by the acquirer | | | |
| e) Total (a+b+c+/-d) | | | |



After the acquisition/sale, holding of:

- a) Shares carrying voting rights
- b) Shares encumbered with the acquirer
- c) VRs otherwise than by shares
- d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition 3,36,094 7.0757% 7.0757%
- e) Total (a+b+c+d)

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).

OPEN MARKET

Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable

01/12/2021

Equity share capital / total voting capital of the TC before the said acquisition / sale

47,50,000

Equity share capital/ total voting capital of the TC after the said acquisition / sale

47,50,000

Total diluted share/voting capital of the TC after the said acquisition

47,50,000

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(**) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Signature of the acquirer / seller / Authorised Signatory

Place: New Delhi

Date: 03.12.2021

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ANNEXURE-1

KHAITAN (INDIA) LTD

S. No	PAN of the acquirer and/or PACs	Name of the acquirer and Person acting in Concert (PAC) with the acquirer	Whether the acquirer belongs to Promotor/Promoter Group	Qty
1		Manju Jain	No	10,012
2		Nidhi Kalia	No	17,754
3		Nitesh Jain	No	39,496
4		Nitin R. Masilamani	No	19,493
5		Payal Gupta	No	32,261
6		Priyank Gupta	No	9,678
7		Priyank Gupta HUF	No	38,305
8		R.J. Masilamani	No	23,003
9		Rahul Bammi HUF	No	19,801
10		Ruchir Gupta	No	10,000
11		Ruchir Gupta HUF	No	16,844
12		Rupali Nitesh Jain	No	18,950
13		Sanjay Sachdeva HUF	No	19,790
14		Shalu Goyal	No	17,269
15		Vertika Agarwal	No	9,700
16		Vishal Garg HUF	No	19,600
17		Y.K.Jain	No	10,033
		Total:		331,989

% as a total of equity capital
Total Equity Shares

6.9892%
4,750,000

Sgt
03 Dec 2021