

RELIANCE INNOVENTURES PRIVATE LIMITED

Registered office: 502, Plot No. 91/94, Prabhat Colony, Santa Cruz (East), Mumbai 400 055
Corporate Identity Number (CIN): U73100MH2005PTC158356
Email ID: relianceinnoventurespl@gmail.com

February 28, 2020

BSE Limited

Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor, Plot No. C/1, G
Block, Bandra Kurla Complex, Bandra (E),
Mumbai - 400 051

The Company Secretary

Reliance Communications Limited

H Block, 1st Floor,
Dhirubhai Ambani Knowledge City,
Navi Mumbai - 400 710

Dear Sir,

Subject: Disclosure in terms of Regulation 31(1) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011


We enclose herewith the captioned disclosure pursuant to Regulation 31(1) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge receipt.

Thanking You.

Yours faithfully,

For Reliance Innoventures Private Limited


Authorized Signatory

Encl: As above

Format for disclosure by the Promoter(s) to the stock exchanges and to the Target Company for encumbrance of shares / invocation of encumbrance/ release of encumbrance, in terms of Regulation 31(1) and 34(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

| Name of the Target Company (TC) | | Reliance Communications Limited | | | | | | | | | | | |
|---|--|---|---|--------------------------|--|--|---|---------------------------|---------|---|---|---|------|
| Names of the Stock Exchanges where the shares of the target company are listed | | BSE Limited National Stock Exchange of India Limited | | | | | | | | | | | |
| Date of reporting | | February 28, 2020 | | | | | | | | | | | |
| Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked | | Reliance Innoventures Private Limited | | | | | | | | | | | |
| Details of the creation/release/invocation of encumbrance: | | | | | | | | | | | | | |
| Name of the promoter (s) or PACs with him* | Promoter holding in the target company (1) | | Promoter holding already encumbered (2) | | Date of creation/release/invocation of encumbrance | | | | | Details of events pertaining to encumbrance (3) | | Post event holding of encumbered Shares {creation [(2)+(3)] / release [(2)-(3)] / invocation [(2)-(3)]} | |
| | Number | % of total share capital | Number | % of total share capital | Type of event (creation / release / invocation) | Date of creation/release/invocation of encumbrance | Type of encumbrance (pledge/lien/ non disposal undertaking/ others) | Reason for encumbrance ** | Number | % of share capital | Name of the entity in whose favor shares encumbered *** | | |
| Reliance Innoventures Private Limited | 12379001 | 0.45 | Nil | Nil | Creation | February 26, 2020 | Pledge | Third party pledge | 6040952 | 0.22 | Trustee - Axis Trustee Services Limited Lenders/Debenture holders: Franklin India Short Term Income Plan, Franklin India Low Duration Fund, Franklin India Credit Risk Fund, Franklin India Dynamic Accrual Fund, Franklin India Income Opportunities Fund | 12379001 | 0.45 |
| | | | | | Creation | February 26, 2020 | Pledge | Third party pledge | 6338049 | 0.23 | Trustee - Axis Trustee Services Limited Lenders/Debenture holders: Franklin India Short Term Income Plan, Franklin India Low Duration Fund, Franklin India Credit Risk Fund | | |

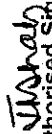
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| Name of the promoter (s) or PACs with him* | Promoter holding in the target company (1) | | Promoter holding already encumbered (2) | | Details of events pertaining to encumbrance (3) | | | | | | | Post event holding of encumbered Shares {creation [(2)+(3)] / release [(2)-(3)] / invocation [(2)-(3)]} | |
|---|--|--------------------------|---|--------------------------|---|--|--|---------------------------|--------|--------------------|---|---|--------------------------|
| | Number | % of total share capital | Number | % of total share capital | Type of event (creation / release / invocation) | Date of creation/ release/ invocation of encumbrance | Type of encumbrance (pledge/ lien/ non disposal undertaking/ others) | Reason for encumbrance ** | Number | % of share capital | Name of the entity in whose favor Shares encumbered *** | Number | % of total share capital |
| | | | | | | | | | | | | | |
| Shri Anil D Ambani | 1859171 | 0.07 | Nil | Nil | - | - | - | - | - | - | - | Nil | Nil |
| Smt. Tina A Ambani | 1650832 | 0.06 | Nil | Nil | - | - | - | - | - | - | - | Nil | Nil |
| Shri Jai Anmol A Ambani | 1669759 | 0.06 | Nil | Nil | - | - | - | - | - | - | - | Nil | Nil |
| Shri Jai Anshul A Ambani | 100 | 0.00 | Nil | Nil | - | - | - | - | - | - | - | Nil | Nil |
| Smt. Kokila D Ambani(#) | 4665847 | 0.17 | Nil | Nil | - | - | - | - | - | - | - | Nil | Nil |
| Reliance Communications Enterprises Private Limited | 134010172 | 4.85 | 134000000 | 4.85 | - | - | - | - | - | - | - | 134000000 | 4.85 |
| Reliance Telecom Infrainvest Private Limited | 66667 | 0.00 | Nil | Nil | - | - | - | - | - | - | - | Nil | Nil |
| Reliance Capital Limited | 29695295 | 1.07 | Nil | Nil | - | - | - | - | - | - | - | Nil | Nil |
| Reliance Wind Turbine Installators Industries Private Limited | 8498729 | 0.31 | Nil | Nil | - | - | - | - | - | - | - | Nil | Nil |
| Reliance Ornatius Enterprises and Ventures Private Limited | 92000000 | 3.33 | Nil | Nil | - | - | - | - | - | - | - | Nil | Nil |

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| Name of the promoter (s) or PACs with him* | Promoter holding in the target company (1) | | Promoter holding already encumbered (2) | | Details of events pertaining to encumbrance (3) | | | | | | | Post event holding of encumbered Shares {creation [(2)+(3)] / release [(2)-(3)] / invocation [(2)-(3)]} | |
|--|--|--------------------------|---|--------------------------|---|--|---|---------------------------|--------|--------------------|---|---|--------------------------|
| | Number | % of total share capital | Number | % of total share capital | Type of event (creation / release / invocation) | Date of creation/ release/ invocation of encumbrance | Type of encumbrance (pledge/ lien/ non disposal/ undertaking/ others) | Reason for encumbrance ** | Number | % of share capital | Name of the entity in whose favor shares encumbered *** | Number | % of total share capital |
| Shreeji Comtrade LLP | 800000 | 0.03 | Nil | Nil | - | - | - | - | - | - | Nil | Nil | |
| Shrikrishna Tradecom LLP | 800000 | 0.03 | Nil | Nil | - | - | - | - | - | - | Nil | Nil | |
| Guruvas Commercials LLP | 700000 | 0.02 | Nil | Nil | - | - | - | - | - | - | Nil | Nil | |
| Dhwani Enterprises LLP | 700000 | 0.02 | Nil | Nil | - | - | - | - | - | - | Nil | Nil | |

For Reliance Innoventures Private Limited


Authorised Signatory

Date: February 28, 2020
Place: Mumbai

* The names of all the promoters, their shareholding in the target company and their pledged shareholding as on the reporting date should appear in the table irrespective of whether they are reporting on the date of event or not.

** For example, for the purpose of collateral for loans taken by the Company, personal borrowing, third party pledge, etc.

*** This would include name of both the lender and the trustee who may hold shares directly or on behalf of the lender.

(#) Includes 10,00,000 (0.04%) equity shares of Target Company purchased by the discretionary Portfolio Manager of Smt. Kokila D. Ambani under the Portfolio Management Scheme (PMS) which have been credited to a separate Demat Account specifically opened for PMS purpose as per the SEBI requirements. No voting or other rights/ interest is held on those shares, except the economic interest in PMS. This is disclosed only by way of an abundant caution.

Disclosure of reasons for encumbrance

| | | |
|---|---|---|
| Name of listed company | : | Reliance Communications Limited |
| Name of the recognised stock exchanges where the shares of the company are listed | : | BSE Limited National Stock Exchange of India Limited |
| Name of the promoter(s) / PACs whose shares have been encumbered | : | Reliance Innoventures Private Limited |
| Total promoter shareholding in the listed company | : | |
| No. of shares – | : | 289495573 |
| % of total share capital - | : | 10.47% |
| Encumbered shares as a % of promoter shareholding | : | 50.56% |
| Whether encumbered share is 50% or more of promoter shareholding | : | YES / NO |
| Whether encumbered share is 20% or more of total share capital | : | YES / NO |




Details of all the existing events/ agreements pertaining to encumbrance:

| Date of creation of encumbrance | | 26-Feb-2020 | 26-Feb-2020 |
|--|--|---|--|
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | | Pledge | Pledge |
| No. and % of shares encumbered | No. of shares: % of total share capital: | 6338049 0.23 | 6040952 0.22 |
| Specific details about the encumbrance | Name of the entity in whose favour shares encumbered (X) Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. Names of all other entities in the agreement Listed company and its group companies (if any) Other entities (if any) – | Axis Trustee Services Limited Trustee Company Reliance Innoventures Pvt. Ltd. Reliance Infrastructure Consulting & Engineers Pvt. Ltd. Reliance Project Ventures & Management Pvt. Ltd. Reliance Big Private Limited Reliance Inceptum Private Limited Axis Trustee Services Limited | Axis Trustee Services Limited Trustee Company Reliance Inceptum Private Limited Reliance Wind Turbine Installators Industries Private Limited Reliance Project Ventures & Management Pvt. Ltd. Axis Trustee Services Limited Reliance Innoventures Pvt. Ltd. |
| Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating | YES / NO (if yes) 1. Name of the issuer 2. Details of the debt instrument | Yes Reliance Infrastructure Consulting & Engineers Private Limited 12% Secured Unlisted Rated Redeemable Non Convertible Debentures of face value of Rs. 10,00,000/- each | Yes Reliance Big Private Limited 12% Secured Unlisted Rated Redeemable Non Convertible Debentures- Series 1, Series 2, Series 3 - face value of Rs. 10,00,000/- each |
| | 3. Whether the debt instrument is listed on stock exchanges? | No | No |
| | 4. Credit Rating of the debt instrument | BWR D | BWR D |
| | 5. ISIN of the instrument | INE428K07011 | Series 1 - INE333T07048 Series 2 - INE333T07055 Series 3 - INE333T07063 |
| Security Cover / Asset Cover | Value of shares on the date of event/ agreement (A) Amount involved (against which shares have been encumbered) (B) Ratio of A / B | *Rs. 44,36,634 Rs. 3,745,000,000 *0.12 | *Rs. 42,28,666 Rs. 3,565,000,000 *0.12 |

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|------------------|---|---|---------------------------|
| End use of money | Borrowed amount to be utilized for what purpose – | No | No |
| | (a) Personal use by promoters and PACs | No | No |
| | (b) For the benefit of listed company Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc. | No | No |
| | (c) Any other reason (please specify) | General Corporate purpose | General Corporate purpose |
| Notes: | | #The above pledge is in addition to other security provided to secure the facility. | |

For Reliance Innoventures Private Limited


Anshu
Authorised Signatory

Date: February 28, 2020
Place: Mumbai