

Date: March 23, 2022

To,  
The Manager,

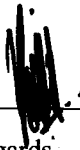
<b>BSE Limited</b> Corporate Relationship Department, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001 Scrip Code: 514175	<b>National Stock Exchange of India Limited</b> Exchange Plaza, 5th Floor, Plot No.C/1, G Block, Bandra-Kurla Complex, Bandra(E), Mumbai- 400051 Symbol: VARDMNPOLY
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**Sub: Intimation under Regulation 10(5) in respect of the proposed acquisition under Regulation 10(1)(a)(i) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

Dear Sir/ Madam,

We, the undersigned, are submitting the requisite disclosure under Regulation 10(5) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("**Takeover Regulations**") in respect of a proposed indirect acquisition under Regulation 10(1)(a)(i) of the Takeover Regulations of up to 22.76% of the paid-up equity shares of Vardhman Polytex Limited pursuant to a proposed acquisition of shares of companies forming part of the promoter group of Vardhman Polytex Limited, as set out in **Annexure A1 and Annexure A2**, between immediate relatives.

This is for your information and records

  
\_\_\_\_\_  
Regards,

Adish Oswal

(On behalf of Adish Oswal and Manju Oswal, Acquirers)

**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)	Vardhman Polytex Limited
2.	Name of the acquirer(s)	1. Adish Oswal 2. Manju Oswal
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
4.	Details of the proposed acquisition	The acquirers will not directly acquire any shares of the TC. This disclosure is being made pursuant to the proposed inter-se transfer of shares of companies which form part of the promoter group of the TC (as set out in <b>Annexure A1 and Annexure A2</b> ) (hereinafter " <b>Promoter Companies</b> ") which could cause an indirect acquisition of shares carrying voting rights of the TC. These inter-se transfer of shares carrying voting rights are by way of gift between (a) Adish Oswal, the acquirer and his immediate relatives – his mother, Manju Oswal, and his brother, Abhinav Oswal; and (b) Manju Oswal, the acquirer and her immediate relative – her son, Adish Oswal.
	a. Name of the person(s) from whom shares are to be acquired	Adish Oswal will acquire shares from: 1. Manju Oswal, mother of Adish Oswal 2. Abhinav Oswal, brother of Adish Oswal  Manju Oswal will acquire shares from Adish Oswal, son of Manju Oswal
	b. Proposed date of acquisition	On or after 30 <sup>th</sup> March, 2022, but not before at least 4 (four) working days from the date hereof
	c. Number of shares to be acquired from each person mentioned in 4(a) above	Shares of the TC will not be acquired directly. Please refer <b>Annexure-A1 and Annexure-A2</b> for details on the number of shares of each Promoter Company proposed to be acquired from each person mentioned in 4(a) above.

	d. Total shares to be acquired as % of share capital of TC	<p>Shares of the TC will not be acquired directly. However, 22.76% of the paid-up equity shareholding of TC is proposed to be acquired indirectly on account of the acquisition of shares of the Promoter Companies. Please refer to <b>Annexure-A1, Note 1</b></p> <p>Additionally, please refer to <b>Annexure-A1 and A2</b> for details on the percentage of shares of each Promoter Company proposed to be acquired by the acquirers.</p>
	e. Price at which shares are proposed to be acquired	<p>Not applicable as direct acquisition of the shares of TC is not contemplated.</p> <p>Shares of the Promoter Companies are proposed to be transferred by way of gift for nil consideration.</p>
	f. Rationale, if any, for the proposed transfer	Proposed inter-se transfer of shares in the Promoter Companies of the TC by way of gift between immediate relatives for nil 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 (SAST) Regulations, 2011
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.	<p>Not applicable as direct acquisition of the shares of TC is not contemplated.</p> <p>Shares of the Promoter Companies are proposed to be transferred by way of gift for nil consideration.</p>
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.	<p>Not Applicable</p> <p>Note that a direct acquisition of the shares of TC is not contemplated. An indirect acquisition of shares of the TC is by way of gift for nil consideration is contemplated.</p>

9.	<p>i. Declaration by the acquirer, that the transferor and transferee have complied (during 3 years prior to the date of proposed acquisition) / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations, 1997)</p> <p>ii. The aforesaid disclosures made during previous 3 years prior to the date of proposed acquisition to be furnished.</p>	<p>i. We hereby declare that the proposed transferor and transferee have complied (during 3 years prior to the date of proposed acquisition) /will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations.</p> <p>ii. Disclosures made during previous 3 years prior to the date of proposed acquisition are attached as <b>Annexure-B (Colly)</b></p>			
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	We hereby declare that all the conditions specified under regulation 10(1)(a) with respect to exemptions claimed herein have been duly complied with.			
11.	<b>Shareholding details</b>	<b>Before the proposed transaction</b>		<b>After the proposed transaction</b>	
		<b>No. of shares /voting rights</b>	<b>% w.r.t total share capital of TC**</b>	<b>No. of shares /voting rights</b>	<b>% w.r.t total share capital of TC**</b>
a	<p><b><u>Acquirer: Adish Oswal:</u></b></p> <p><b>Acquirer(s) and PACs (other than sellers) (*)</b></p>				
	i. Ashok Kumar Oswal	1,27,748	0.57%	1,27,748	0.57%
	ii. Adish Oswal	4,20,511	1.89%	4,20,511	1.89%
	iii. Aketa Oswal	5,460	0.02%	5,460	0.02%
	iv. Rakhi Oswal	17,820	0.08%	17,820	0.08%
	v. Ashok Kumar and Sons, HUF	110	0.00%	110	0.00%
	vi. Kent Investments Pvt. Ltd.	46,950	0.21%	46,950	0.21%
	vii. Enakshi Investments Pvt. Ltd.	3,70,250	1.66%	3,70,250	1.66%
	viii. Panchsheel Textile Mfg. and Trading Co. Pvt. Ltd.	44,26,917	19.86%	44,26,917	19.86%
	ix. Ruby Mercantile Co. Pvt. Ltd.	1,53,000	0.69%	1,53,000	0.69%
	x. Calgary Investment and Trading Co. Pvt. Ltd.	67,300	0.30%	67,300	0.30%
	xi. Nightnagle Dealcom Pvt. Ltd.	6,60,000	2.96%	6,60,000	2.96%
	xii. Gagan Mercantile Company Pvt. Ltd.	1,63,900	0.74%	1,63,900	0.74%
	xiii. Pioneer Mercantile India Pvt. Ltd.	49,350	0.22%	49,350	0.22%
	xiv. Altfort Merchants Pvt. Ltd.	21,82,000	9.79%	21,82,000	9.79%
	xv. Liberty Mercantile Co. Pvt. Ltd.	1,20,550	0.54%	1,20,550	0.54%
	xvi. Boras Investment and Trading Co. Pvt. Ltd.	32,860	0.15%	32,860	0.15%

	xvii.	Allepy Investment and Trading Co. Pvt. Ltd.	95,500	0.43%	95,500	0.43%
	xviii.	Adesh Investment Trading Co. Pvt. Ltd.	35,100	0.16%	35,100	0.16%
	xix.	Alma Assets Consultancy Pvt. Ltd.	43,62,325	19.57%	43,62,325	19.57%
	xx.	Amrante Trust through Rakhi Oswal, Trustee	5,139	0.02%	5,139	0.02%
	<b>b</b>	<b>Sellers</b>				
	i.	Manju Oswal	52,694	0.24 %	52,694	0.24 %
	ii.	Abhinav Oswal	14,307	0.06%	14,307	0.06%

Note A :

No changes are taking place in the shareholding pattern of TC since the proposed transfers are being undertaken at an indirect level (i.e., shares of the Promoter Companies); but shareholding in the Promoter Companies (which are part of above stated Promoter Group) is proposed to change as per Annexure-A.

\*\*Represented as per the shareholding pattern filed by the TC with the BSE Limited for the quarter ending December 31, 2021.

Note B:

(\* 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.

12.	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	<b>Acquirer: Manju Oswal:</b>				
	<b>Acquirer(s) and PACs (other than sellers) (*)</b>				
	i. Ashok Kumar Oswal	1,27,748	0.57%	1,27,748	0.57%
	ii. Aketa Oswal	5,460	0.02%	5,460	0.02%
	iii. Rakhi Oswal	17,820	0.08%	17,820	0.08%
	iv. Manju Oswal	52,694	0.24 %	52,694	0.24 %
	v. Abhinav Oswal	14,307	0.06%	14,307	0.06%
	vi. Ashok Kumar and Sons, HUF	110	0.00%	110	0.00%
	vii. Kent Investments Pvt. Ltd.	46,950	0.21%	46,950	0.21%

	viii.	Enakshi Investments Pvt. Ltd.	3,70,250	1.66%	3,70,250	1.66%
	ix.	Panchsheel Textile Mfg. and Trading Co. Pvt. Ltd.	44,26,917	19.86%	44,26,917	19.86%
	x.	Ruby Mercantile Co. Pvt. Ltd.	1,53,000	0.69%	1,53,000	0.69%
	xi.	Calgary Investment and Trading Co. Pvt. Ltd.	67,300	0.30%	67,300	0.30%
	xii.	Nightnagle Dealcom Pvt. Ltd.	6,60,000	2.96%	6,60,000	2.96%
	xiii.	Gagan Mercantile Company Pvt. Ltd.	1,63,900	0.74%	1,63,900	0.74%
	xiv.	Pioneer Mercantile India Pvt. Ltd.	49,350	0.22%	49,350	0.22%
	xv.	Altfort Merchants Pvt. Ltd.	21,82,000	9.79%	21,82,000	9.79%
	xvi.	Liberty Mercantile Co. Pvt. Ltd.	1,20,550	0.54%	1,20,550	0.54%
	xvii.	Boras Investment and Trading Co. Pvt. Ltd.	32,860	0.15%	32,860	0.15%
	xviii.	Allepy Investment and Trading Co. Pvt. Ltd.	95,500	0.43%	95,500	0.43%
	xix.	Adesh Investment Trading Co. Pvt. Ltd.	35,100	0.16%	35,100	0.16%
	xx.	Alma Assets Consultancy Pvt. Ltd.	43,62,325	19.57%	43,62,325	19.57%
	xxi.	Amrante Trust through Rakhi Oswal, Trustee	5,139	0.02%	5,139	0.02%
	<b>b</b>	<b>Seller</b>				
	i.	Adish Oswal	4,20,511	1.89%	4,20,511	1.89%

**Note A :**

*No changes are taking place in the shareholding pattern of TC since the proposed transfers are being undertaken at an indirect level (i.e., shares of the Promoter Companies); but shareholding in the Promoter Companies (which are part of above stated Promoter Group) is proposed to change as per Annexure-A.*

*\*\*Represented as per the shareholding pattern filed by the TC with the BSE Limited for the quarter ending December 31, 2021.*

**Note B:**

*(\*) 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.*



Adish Oswal  
Promoter (on behalf of Adish Oswal and Manju Oswal)  
Vardhman Polytex Limited

Place: Ludhiana  
Date: 23.03.2022

**Annexure - A1**

**1 In KENT INVESTMENTS PVT. LTD.**

**(part of Promoter Group)**

Name of Transferee (being part of promoter group)	Name of Transferor (being part of promoter group)	No. of Equity Shares	% of shareholding of the Promoter Company proposed to be transferred	Consideration
Adish Oswal	Manju Oswal	3820	38.20	By way of Gift
Adish Oswal	Abhinav Oswal	3800	38.00	By way of Gift
			<b>76.20</b>	

**% of Voting Capital of the TC held by the Promoter Company**  
0.21

**2 In PANCHSHEEL TEXTILE MANUFACTURING & TRADING CO (P) LTD.**

**(part of Promoter Group)**

**Equity Shares:**

Name of Transferee (being part of promoter group)	Name of Transferor (being part of promoter group)	No. of Equity Shares	% of shareholding of the Promoter Company proposed to be transferred	Consideration
Adish Oswal	Manju Oswal	12965	72.05	By way of Gift
			<b>72.05</b>	

**% of Voting Capital of the TC held by the Promoter Company**  
19.86

**Preference Shares:**

Name of Transferee (being part of promoter group)	Name of Transferor (being part of promoter group)	No. & Type of Shares	Whether the Preference Shares have Voting Rights	Consideration
Adish Oswal	Manju Oswal	7500 (10% Preference Shares)	No Voting Rights	By way of Gift

Adish Oswal	Manju Oswal	8443 (6% Non Cumulative Convertible Redeemable Preference Shares (Series-C))	No Voting Rights	By way of Gift
Adish Oswal	Abhinav Oswal	1500 (10% Preference Shares)	No Voting Rights	By way of Gift

3 In RUBY MERCANTILE CO PVT. LTD. (part of Promoter Group) (part of Promoter Group)

Name of Transferee (being part of promoter group)	Name of Transferor (being part of promoter group)	No. of Equity Shares	% of shareholding of the Promoter Company proposed to be transferred	Consideration

**% of Voting Capital of the TC held by the Promoter Company**  
0.69



Adish Oswal	Manju Oswal	4300	43.00	By way of Gift
Adish Oswal	Abhinav Oswal	4000	40.00	By way of Gift
			<b>83.00</b>	

4 In CALGARY INVESTMENT&TRADING CO PVT. LTD. (part of Promoter Group)

Name of Transferee (being part of promoter group)	Name of Transferor (being part of promoter group)	No. of Equity Shares	% of shareholding of the Promoter Company proposed to be transferred	Consideration
Adish Oswal	Manju Oswal	2000	79.62	By way of Gift
			<b>79.62</b>	

% of Voting  
Capital of the TC  
held by the  
Promoter  
Company  
0.3

5 In GAGAN MERCANTILE CO PVT. LTD. (part of Promoter Group)

Name of Transferee (being part of promoter group)	Name of Transferor (being part of promoter group)	No. of Equity Shares	% of shareholding of the Promoter Company proposed to be transferred	Consideration
Adish Oswal	Manju Oswal	4400	44.00	By way of Gift
Adish Oswal	Abhinav Oswal	3500	35.00	By way of Gift
			<b>79.00</b>	

% of Voting  
Capital of the TC  
held by the  
Promoter  
Company  
0.74

6 In PIONEER MARCANTILE INDIA PVT. LTD. (part of Promoter Group)

Name of Transferee (being part of promoter group)	Name of Transferor (being part of promoter group)	No. of Equity Shares	% of shareholding of the Promoter Company proposed to be transferred	Consideration

% of Voting  
Capital of the TC  
held by the  
Promoter  
Company  
0.22

Adish Oswal	Manju Oswal	6800	68.00	By way of Gift
Adish Oswal	Abhinav Oswal	3000	30.00	By way of Gift
			<b>98.00</b>	

7 In BORAS INVESTMENT & TRADING CO. PVT. LTD.

(part of Promoter Group)

Name of Transferee (being part of promoter group)	Name of Transferor (being part of promoter group)	No. of Equity Shares	% of shareholding of the Promoter Company proposed to be transferred	Consideration

**% of Voting  
Capital of the TC  
held by the  
Promoter  
Company  
0.15**

Adish Oswal	Manju Oswal	8802	44.01	By way of Gift
Adish Oswal	Abhinav Oswal	5000	25.00	By way of Gift
			<b>69.01</b>	

8 In ALLEPY INVESTMENT & TRADING CO. PVT. LTD. (part of Promoter Group)

Name of Transferee	Name of Transferor	No. of Equity Shares	% of shareholding of the Promoter Company proposed to be transferred	Consideration
(being part of promoter group)	(being part of promoter group)			
Adish Oswal	Manju Oswal	6000	76.45	By way of Gift
			<b>76.45</b>	

% of Voting Capital of the TC held by the Promoter Company  
**0.43**

9 In ADESH INVESTMENT & TRADING CO PVT. LTD. (part of Promoter Group)

Name of Transferee	Name of Transferor	No. of Equity Shares	% of shareholding of the Promoter Company proposed to be transferred	Consideration
(being part of promoter group)	(being part of promoter group)			
Adish Oswal	Manju Oswal	9022	36.00	By way of Gift
Adish Oswal	Abhinav Oswal	5	0.02	By way of Gift
			<b>36.02</b>	

% of Voting Capital of the TC held by the Promoter Company  
**0.16**

**Note 1**

**Detail of indirect acquisition of voting share capital of TC**

**% of Voting Capital of the TC**

Extent of proposed indirect acquisition by Adish Oswal of the voting share capital of the TC on account of the proposed acquisition of the shares of the Promoter Companies as set out above

**22.76**

**Annexure - A2**

1 In ENAKSHI INVESTMENTS PVT. LTD.

(part of Promoter Group)

% Holding in TC

Name of Transferee	Name of Transferor	No. of Equity Shares	% of shareholding of the Promoter Company proposed to be transferred	Consideration
(being part of promoter group)	(being part of promoter group)			
Manju Oswal	Adish Oswal	1510	1.77	By way of Gift
			1.77	

1.66

**Note**

Enakshi Investments Pvt. Ltd. is under the control of Manju Oswal prior to the proposed transfer set out above and will continue to be under the control of Manju Oswal post the proposed transfer set out above.

**Annexure- B**

**{Disclosures made during previous 3 years under Chapter V of SEBI (SAST) Regulations, 2011}**

- 1) Annual Disclosure under Chapter V of SEBI (SAST) Regulations, 2011 dated 01.04.2021 (under Regulation 30).
- 2) Annual Disclosure under Chapter V of SEBI (SAST) Regulations, 2011 dated 01.04.2021 [under Regulation 31(4)].
- 3) Annual Disclosure under Chapter V of SEBI (SAST) Regulations, 2011 dated 25.05.2020 (under Regulation 30).
- 4) Annual Disclosure under Chapter V of SEBI (SAST) Regulations, 2011 dated 01.04.2019 (under Regulation 30).

Date: 01-04-2021

The Listing Department, <b>NATIONAL STOCK EXCHANGE OF INDIA LTD,</b> "Exchange Plaza" Bandra - Kurla Complex, Bandra (East), Mumbai- 400 051 <b>Scrip Code: VARDMNPOLY</b>	The Listing Department, <b>BSE LIMITED</b> 25th Floor, P.J. Towers, Dalal Street, Fort, Mumbai- 400 001  <b>Scrip Code: 514175</b>
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**SUBJECT: Notice under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir/ Madam,

Please find enclosed herewith notice under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 regarding aggregate shareholding and voting rights of promoter /promoter group as on 31.03.2021.

Kindly acknowledge the receipt.

Thanking you,

**Yours faithfully,**

**For and on behalf of  
Promoter Group of Vardhman Polytex Ltd**



**Adish Oswal  
(Authorised Signatory)**

**CC: Vardhman Polytex Limited,  
Vardhman Park,  
Chandigarh Road,  
Ludhiana - 141123**

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A - Details of Shareholding**

1	Name of the Target Company (TC)	VARDHMAN POLYTEX LIMITED		
2	Name(s) of the stock exchange(s) where the shares of the TC are listed	BSE Limited (514175) National Stock Exchange of India Ltd (VARDMNPOLY)		
3	Particulars of the shareholder(s):			
a)	Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC)/TC) is more than 25% of the voting rights of the TC. or	N/A		
b)	Name(s) of promoter(s), member of the promoter group and PAC with him.	1	Panchsheel Tex. Mfg. & Trdg. Co. (P) Ltd.	
		2	Alma Assets Consultancy (P) Ltd	
		3	Alfort Merchants (P) Ltd.	
		4	Nighthagle Dealcom (P) Ltd	
		5	Enakshi Investments (P) Ltd.	
		6	Gagan Mercantile Co. (P) Ltd.	
		7	Ruby Mercantile Co. (P) Ltd.	
		8	Liberty Mercantile Co. (P) Ltd.	
		9	Allepy Invst. & Trdg. Co. (P) Ltd.	
		10	Calgary Invst. & Trdg. Co. (P) Ltd.	
		11	Pioneer Mercantile Co. (P) Ltd.	
		12	Kent Investments (P) Ltd.	
		13	Adesh Invst. & Trdg. Co. (P) Ltd.	
		14	Boras Invst. & Trdg. Co. (P) Ltd.	
		15	Mr. Adish Oswal	
		16	Mr. Ashok Kumar Oswal#	
		17	Mrs. Manju Oswal	
		18	Mrs. Rakhi Oswal	
		19	Mr. Abhinav Oswal	
		20	Ms Aketa Oswal	
		21	Ashok Kumar & Sons (HUF)#	
		22	Amrante Trust (through Trustee- Mrs. Rakhi Oswal)	
4	Particulars of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
	<b>As of March 31, 2021, holding of:</b>			
a)	Shares			
1	Mr. Adish Oswal	420511	1.89%	1.89%
2	Mr. Ashok Kumar Oswal#	127748	0.57%	0.57%
3	Mrs. Manju Oswal	52694	0.24%	0.24%
4	Mrs. Rakhi Oswal	17820	0.08%	0.08%
5	Mr. Abhinav Oswal	14307	0.06%	0.06%
6	Ms Aketa Oswal	5460	0.02%	0.02%
7	Ashok Kumar & Sons (HUF)#	110	0.00%	0.00%
8	Panchsheel Tex. Mfg. & Trdg. Co. (P) Ltd.	4426917	19.86%	19.86%
9	Alma Assets Consultancy (P) Ltd	4362325	19.57%	19.57%
10	Alfort Merchants (P) Ltd.	2182000	9.79%	9.79%
11	Nighthagle Dealcom (P) Ltd	680000	2.96%	2.96%
12	Enakshi Investments (P) Ltd.	370250	1.66%	1.66%
13	Gagan Mercantile Co. (P) Ltd.	163900	0.74%	0.74%
14	Ruby Mercantile Co. (P) Ltd.	153000	0.69%	0.69%
15	Liberty Mercantile Co. (P) Ltd.	120550	0.54%	0.54%
16	Allepy Invst. & Trdg. Co. (P) Ltd.	95500	0.43%	0.43%
17	Calgary Invst. & Trdg. Co. (P) Ltd.	67300	0.30%	0.30%
18	Pioneer Mercantile Co. (P) Ltd.	49350	0.22%	0.22%
19	Kent Investments (P) Ltd.	46950	0.21%	0.21%
20	Adesh Invst. & Trdg. Co. (P) Ltd.	35100	0.16%	0.16%
21	Boras Invst. & Trdg. Co. (P) Ltd.	32860	0.15%	0.15%
22	Amrante Trust (through Trustee- Mrs. Rakhi Oswal)	10000	0.04%	0.04%
	<b>GRAND-TOTAL</b>	<b>13414652</b>	<b>60.18%</b>	<b>60.18%</b>
b)	Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c)	Warrants	Nil	Nil	Nil
d)	Convertible Securities	Nil	Nil	Nil
e)	Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
	<b>Total</b>	<b>13414652</b>	<b>60.18%</b>	<b>60.18%</b>

(\*) 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.


# Mr. Ashok Kumar Oswal expired on 15.11.2018 and the transmission of the shares held in his own name and that of HUF (Ashok Kumar & Sons) is yet to be executed.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

For and on behalf of Promoter Group of Vardhman Polytex Ltd


Place: LUDHIANA  
Date: 01.04.2021

  
(ADISH OSWAL)  
Authorised Signatory

Part-B\*\*

Sr no.	Name of the Target Company:	VARDHMAN POLYTEX LIMITED	
	Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter/Promoter group	PAN of the person and PACs
1	Panchsheel Tex. Mfg. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACP9949C
2	Alma Assets Consultancy (P) Ltd	Promoter/Promoter Group	AADCK1963C
3	Alfort Merchants (P) Ltd.	Promoter/Promoter Group	AAICA9847L
4	Nightnagle Dealcom (P) Ltd	Promoter/Promoter Group	AACCN5938R
5	Enakshi Investments (P) Ltd.	Promoter/Promoter Group	AAACE4008R
6	Gagan Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACG6654M
7	Ruby Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACR8016L
8	Liberty Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACL3102F
9	Allepy Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AABCA2470N
10	Calgary Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACC6149B
11	Pioneer Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AABCP0010H
12	Kent Investments (P) Ltd.	Promoter/Promoter Group	AAACK7413Q
13	Adesh Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AABCA0277H
14	Boras Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACB4722H
15	Mr. Adish Oswal	Promoter/Promoter Group	AACPO8407D
16	Mr. Ashok Kumar Oswal	Promoter/Promoter Group	AACPO8406C
17	Mrs. Manju Oswal	Promoter/Promoter Group	AADPO0618F
18	Mrs. Rakhi Oswal	Promoter/Promoter Group	AFWPK6455Q
19	Mr. Abhinav Oswal	Promoter/Promoter Group	AAJPO0573B
20	Ms Aketa Oswal	Promoter/Promoter Group	AAXPO6768J
21	Ashok Kumar & Sons (HUF)	Promoter/Promoter Group	AAGHA7592F
22	Amranto Trust (through Trustee- Mrs. Rakhi Oswal)	Promoter/Promoter Group	AAFTA9894F

For and on behalf of Promoter Group of Vardhman Polytex Ltd

Place: LUDHIANA  
Date: 01.04.2021
  
(ADISH OSWAL)  
Authorized Signatory

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

(\* ) 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.

(\*\* ) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated



**Date: 01-04-2021**

<p>The Listing Department, <b>NATIONAL STOCK EXCHANGE OF INDIA LTD,</b> "Exchange Plaza" Bandra - Kurla Complex, Bandra (East), Mumbai- 400 051 <b>Scrip Code: VARDMNPOLY</b></p>	<p>The Listing Department, <b>BSE LIMITED</b> 25th Floor, P.J. Towers, Dalal Street, Fort, Mumbai- 400 001 <b>Scrip Code: 514175</b></p>
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**SUB: Disclosure under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir/ Madam,

Pursuant to the Regulation 31(4) of SEBI (SAST) Regulations, 2011, I, on behalf of promoter group of the Company (Vardhman Polytex Limited), hereby, declare that we (Promoter Group) have not made any encumbrance of shares, other than already disclosed, during the year ended 31-03-2021.

This is for your information and record please.

Thanking you,

**Yours faithfully,**

**For and on behalf of  
Promoter Group of Vardhman Polytex Ltd**

  
**Adish Oswal  
(Authorised Signatory)**

**CC: Audit Committee  
Vardhman Polytex Limited,  
Vardhman Park,  
Chandigarh Road,  
Ludhiana - 141123**

## Ajay Ratra

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**From:** Ajay Ratra <ajay.ratra@vpl.in>  
**Sent:** Monday, May 25, 2020 7:06 PM  
**To:** 'takeover@nse.co.in'; 'corp.relations@bseindia.com'  
**Subject:** Notice u/r 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011) - Vardhman Polytex Limited  
**Attachments:** VPL\_SAST\_disclosure\_31032020.pdf

Dear Sir/ Madam,

Please find enclosed herewith notice under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 regarding aggregate shareholding and voting rights of promoter /promoter group as on 31.03.2020 in Vardhman Polytex Limited.

Kindly Acknowledge the Receipt.

Regards,

Adish Oswal

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1	Name of the Target Company (TC)	VARDHMAN POLYTEX LIMITED		
2	Name(s) of the stock exchange(s) where the shares of the TC are listed	BSE Limited (814178) National Stock Exchange of India Ltd (VARDMNPOLY)		
3	Particulars of the shareholder(s):	N.A.		
a)	Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.			
b)	Name(s) of promoter(s), member of the promoter group and PAC with him.			
		1	Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.	
		2	Alma Assets Consultancy (P) Ltd	
		3	Allfort Merchants (P) Ltd.	
		4	Nighthagle Dealcom (P) Ltd	
		5	Enakshi Investments (P) Ltd.	
		6	Gagan Mercantile Co. (P) Ltd.	
		7	Ruby Mercantile Co. (P) Ltd.	
		8	Liberty Mercantile Co. (P) Ltd.	
		9	Allepy Invst. & Trdg. Co. (P) Ltd.	
		10	Calgary Invst. & Trdg. Co. (P) Ltd.	
		11	Pioneer Mercantile Co. (P) Ltd.	
		12	Kent Investments (P) Ltd.	
		13	Adesh Invst. & Trdg. Co. (P) Ltd.	
		14	Boras Invst. & Trdg. Co. (P) Ltd.	
		15	Mr. Adish Oswal	
		16	Mr. Ashok Kumar Oswal#	
		17	Mrs. Manju Oswal	
		18	Mrs. Rakhi Oswal	
		19	Mr. Abhinav Oswal	
		20	Ms Aketa Oswal	
		21	Ashok Kumar & Sons (HUF)#	
		22	Amrante Trust (through Trustee- Mrs. Rakhi Oswal)	
4	Particulars of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
	As of March 31, 2020, holding of:			
a)	Shares			
1	Mr. Adish Oswal	420511	1.89%	1.89%
2	Mr. Ashok Kumar Oswal#	127748	0.57%	0.57%
3	Mrs. Manju Oswal	52694	0.24%	0.24%
4	Mrs. Rakhi Oswal	17820	0.08%	0.08%
5	Mr. Abhinav Oswal	14307	0.06%	0.06%
6	Ms Aketa Oswal	5460	0.02%	0.02%
7	Ashok Kumar & Sons (HUF)#	110	0.00%	0.00%
8	Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.	4426917	19.86%	19.86%
9	Alma Assets Consultancy (P) Ltd	4362325	19.57%	19.57%
10	Allfort Merchants (P) Ltd.	2182000	9.79%	9.79%
11	Nighthagle Dealcom (P) Ltd	660000	2.96%	2.96%
12	Enakshi Investments (P) Ltd.	370250	1.66%	1.66%
13	Gagan Mercantile Co. (P) Ltd.	163900	0.74%	0.74%
14	Ruby Mercantile Co. (P) Ltd.	153000	0.69%	0.69%
15	Liberty Mercantile Co. (P) Ltd.	120550	0.54%	0.54%
16	Allepy Invst. & Trdg. Co. (P) Ltd.	95500	0.43%	0.43%
17	Calgary Invst. & Trdg. Co. (P) Ltd.	67300	0.30%	0.30%
18	Pioneer Mercantile Co. (P) Ltd.	49350	0.22%	0.22%
19	Kent Investments (P) Ltd.	46950	0.21%	0.21%
20	Adesh Invst. & Trdg. Co. (P) Ltd.	35100	0.16%	0.16%
21	Boras Invst. & Trdg. Co. (P) Ltd.	32860	0.15%	0.15%
22	Amrante Trust (through Trustee- Mrs. Rakhi Oswal)	10000	0.04%	0.04%
	<b>GRAND-TOTAL</b>	<b>13414652</b>	<b>60.18%</b>	<b>60.18%</b>
b)	Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c)	Warrants	Nil	Nil	Nil
d)	Convertible Securities	Nil	Nil	Nil
e)	Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
	<b>Total</b>	<b>13414652</b>	<b>60.18%</b>	<b>60.18%</b>


(\*) 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.

# Mr. Ashok Kumar Oswal expired on 15.11.2018 and the transmission of the shares held in his own name and that of HUF (Ashok Kumar & Sons) is yet to be executed.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

For and on behalf of  
Promoter Group of Vardhman Polytex Ltd

✓   
(ADISH OSWAL)  
Authorised Signatory

Place: LUDHIANA  
Date: 25.05.2020

## Part-B\*\*

Sr no.	Name of the Target Company:		Whether the person belongs to Promoter/Promoter group	PAN of the person and PACs
	Name(s) of the person and Persons Acting In Concert (PAC) with the person	VARDHMAN POLYTEX LIMITED		
1	Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.			
2	Alma Assets Consultancy (P) Ltd	Promoter/Promoter Group	AAACP9949C	
3	Altfort Merchants (P) Ltd.	Promoter/Promoter Group	AADCK1983C	
4	Nightnagle Dealcom (P) Ltd	Promoter/Promoter Group	AAICA9847L	
5	Enakshi Investments (P) Ltd.	Promoter/Promoter Group	AACCN5938R	
6	Gagan Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACE4008R	
7	Ruby Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACG8654M	
8	Liberty Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACR8016L	
9	Allepy Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACL3102F	
10	Calgary Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AABCA2470N	
11	Pioneer Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACC6149B	
12	Kent Investments (P) Ltd.	Promoter/Promoter Group	AABCP0010H	
13	Adesh Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACK7413Q	
14	Boras Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AABCA0277H	
15	Mr. Adish Oswal	Promoter/Promoter Group	AAACB4722H	
16	Mr. Ashok Kumar Oswal	Promoter/Promoter Group	AACPO8407D	
17	Mrs. Manju Oswal	Promoter/Promoter Group	AACPO8406C	
18	Mrs. Rakhi Oswal	Promoter/Promoter Group	AADPO0618F	
19	Mr. Abhinav Oswal	Promoter/Promoter Group	AFWPK8455Q	
20	Ms Aketa Oswal	Promoter/Promoter Group	AAJPO0573B	
21	Ashok Kumar & Sons (HUF)	Promoter/Promoter Group	AAXPO6768J	
22	Amrante Trust (through Trustee- Mrs. Rakhi Oswal)	Promoter/Promoter Group	AAGHA7592F	

For and on behalf of  
Promoter Group of Vardhman Polytex Ltd

✓  
(ADISH OSWAL)  
Authorized Signatory

Place: LUDHIANA  
Date: 25.05.2020

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

(\*) 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.

(\*\*) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated

Date: 01.04.2019

<b>The Listing Department, NATIONAL STOCK EXCHANGE OF INDIA LTD, "Exchange Plaza" Bandra – Kurla Complex, Bandra (East), Mumbai- 400 051 Scrip Code: VARDMNPOLY</b>	<b>The Listing Department, BSE LIMITED 25<sup>th</sup> Floor, P.J. Towers, Dalal Street, Fort, Mumbai- 400 001 Scrip Code: 514175</b>
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**SUBJECT: Notice under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir/ Madam,

Please find enclosed herewith notice under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 regarding aggregate shareholding and voting rights of promoter /promoter group as on 31.03.2019.

Kindly Acknowledge the Receipt.

Thanking you,

Yours faithfully,

For and on behalf of Promoter Group of Vardhman Polytex Ltd.



Adish Oswal  
(Authorised Signatory)

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1	Name of the Target Company (TC)	<b>VARDHMAN POLYTEX LIMITED</b>		
2	Name(s) of the stock exchange(s) where the shares of the TC are listed	<b>BSE Limited (514175) National Stock Exchange of India Ltd (VARDMNPOLY)</b>		
3	Particulars of the shareholder(s):			
a)	Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.	N.A		
b)	Name(s) of promoter(s), member of the promoter group and PAC with him.	1	Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.	
		2	Alma Assets Consultancy (P) Ltd	
		3	Alfort Merchants (P) Ltd.	
		4	Nighnagle Dealcom (P) Ltd	
		5	Enakshi Investments (P) Ltd.	
		6	Gagan Mercantile Co. (P) Ltd.	
		7	Ruby Mercantile Co. (P) Ltd.	
		8	Liberty Mercantile Co. (P) Ltd.	
		9	Allepy Invst. & Trdg. Co. (P) Ltd.	
		10	Calgary Invst. & Trdg. Co. (P) Ltd.	
		11	Pioneer Mercantile Co. (P) Ltd.	
		12	Kent Investments (P) Ltd.	
		13	Adesh Invst. & Trdg. Co. (P) Ltd.	
		14	Boras Invst. & Trdg. Co. (P) Ltd.	
		15	Mr. Adish Oswal	
		16	Mr. Ashok Kumar Oswal#	
		17	Mrs. Manju Oswal	
		18	Mrs. Rakhi Oswal	
		19	Mr. Abhinav Oswal	
		20	Ms Aketa Oswal	
		21	Ashok Kumar & Sons (HUF)#	
		22	Amrante Trust (through Trustee- Mrs. Rakhi Oswal)	
4	Particulars of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
	<b>As of March 31, 2019, holding of:</b>			
a)	<b>Shares</b>			
1	Mr. Adish Oswal	420511	1.89%	1.89%
2	Mr. Ashok Kumar Oswal#	127748	0.57%	0.57%
3	Mrs. Manju Oswal	52694	0.24%	0.24%
4	Mrs. Rakhi Oswal	17820	0.08%	0.08%
5	Mr. Abhinav Oswal	14307	0.06%	0.06%
6	Ms Aketa Oswal	5460	0.02%	0.02%
7	Ashok Kumar & Sons (HUF)#	110	0.00%	0.00%
8	Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.	4426917	19.86%	19.86%
9	Alma Assets Consultancy (P) Ltd	4362325	19.57%	19.57%
10	Alfort Merchants (P) Ltd.	2182000	9.79%	9.79%
11	Nighnagle Dealcom (P) Ltd	660000	2.96%	2.96%
12	Enakshi Investments (P) Ltd.	370250	1.66%	1.66%
13	Gagan Mercantile Co. (P) Ltd.	163900	0.74%	0.74%
14	Ruby Mercantile Co. (P) Ltd.	153000	0.69%	0.69%
15	Liberty Mercantile Co. (P) Ltd.	120550	0.54%	0.54%
16	Allepy Invst. & Trdg. Co. (P) Ltd.	95500	0.43%	0.43%
17	Calgary Invst. & Trdg. Co. (P) Ltd.	67300	0.30%	0.30%
18	Pioneer Mercantile Co. (P) Ltd.	49350	0.22%	0.22%
19	Kent Investments (P) Ltd.	46950	0.21%	0.21%
20	Adesh Invst. & Trdg. Co. (P) Ltd.	35100	0.16%	0.16%
21	Boras Invst. & Trdg. Co. (P) Ltd.	32860	0.15%	0.15%
22	Amrante Trust (through Trustee- Mrs. Rakhi Oswal)	10000	0.04%	0.04%
	<b>GRAND-TOTAL</b>	<b>13414652</b>	<b>60.18%</b>	<b>60.18%</b>
b)	Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c)	Warrants	Nil	Nil	Nil
d)	Convertible Securities	Nil	Nil	Nil
e)	Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
	<b>Total</b>	<b>13414652</b>	<b>60.18%</b>	<b>60.18%</b>

(\*) 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.  
 # Mr. Ashok Kumar Oswal expired on 15.11.2018 and the transmission of the shares in his own name and that of HUF (Ashok Kumar & Sons) is yet to be executed.

Note  
 1 In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

For and on behalf of Promoter Group of Vardhman Polytex Ltd


Place: LUDHIANA  
 Date: 01.04.2019

  
**(ADISH OSWAL)**  
 Authorised Signatory

Part-B\*\*

Sr no.	Name of the Target Company: Name(s) of the person and Persons Acting in Concert (PAC) with the person	VARDHMAN POLYTEX LIMITED	
		Whether the person belongs to Promoter/Promoter group	PAN of the person and PACs
1	Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.	Promoter/Promoter Group	AAAC99949C
2	Alma Assets Consultancy (P) Ltd	Promoter/Promoter Group	AADCK1963C
3	Alfort Merchants (P) Ltd.	Promoter/Promoter Group	AAICA9847L
4	Nightnagle Dealcom (P) Ltd	Promoter/Promoter Group	AACCN5938R
5	Enakshi Investments (P) Ltd.	Promoter/Promoter Group	AAACE4008R
6	Gagan Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACG6654M
7	Ruby Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACR8016L
8	Liberty Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACL3102F
9	Allepy Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AABCA2470N
10	Calgary Invst. & Trdg. Co. (P) Ltd	Promoter/Promoter Group	AAACC6149B
11	Pioneer Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AABCF0010H
12	Kent Investments (P) Ltd.	Promoter/Promoter Group	AAACK7413Q
13	Adesh Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AABCA0277H
14	Boras Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACB4722H
15	Mr. Adish Oswal	Promoter/Promoter Group	AACPO8407D
16	Mr. Ashok Kumar Oswal	Promoter/Promoter Group	AACPO8406C
17	Mrs. Manju Oswal	Promoter/Promoter Group	AADPO0618F
18	Mrs. Rakhi Oswal	Promoter/Promoter Group	AFWPK6455Q
19	Mr. Abhinav Oswal	Promoter/Promoter Group	AAJPO0573B
20	Ms Aketa Oswal	Promoter/Promoter Group	AAXP06768J
21	Ashok Kumar & Sons (HUF)	Promoter/Promoter Group	AAGHA7592F
22	Amrante Trust (through Trustee- Mrs. Rakhi Oswal)	Promoter/Promoter Group	AAFTA9894F

For and on behalf of Promoter Group of Vardhman Polytex Ltd

  
(ADISH OSWAL)  
Authorized Signatory

Place: LUDHIANA  
Date: 01.04.2019

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

(\*) 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.

(\*\*) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated