

**LUHARUKA INVESTMENT AND CONSULTANTS PRIVATE LIMITED**

**CIN: U67190MH1989PTC053454**

**Registered Office: A-301, Hetal Arch, S.V. Road, Opp Natraj Market, Malad (West), Mumbai 400064,  
Phone No. 022-6894-8500/08/09; Fax No. 022- 28892527; Email-id: [luharukainvestment1989@gmail.com](mailto:luharukainvestment1989@gmail.com)**

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**Date: January 24, 2025**

To, <b>The Manager, Department of Corporate Services, BSE Limited,</b> Phirozee Jeejeeboy Towers, Dalal Street, Fort, Mumbai – 400 001 <b>Scrip Code: 535267</b>	To, <b>The Company Secretary, Comfort Fincap Limited,</b> Registered Office: 22, Camac Street, Block B, Kolkata, West Bengal - 700016
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**Sub: Disclosure pursuant to the provisions of Regulation 29(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir/Ma'am,

Pursuant to provisions of Regulation 29(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, Enclosed herewith the disclosure relating to acquisition of equity shares of Comfort Fincap Limited.

You are requested to take note of the same in your records.

Thanking you,

Yours truly,

**For Luharuka Investment and Consultants Private Limited**

**Apeksha Kadam  
Director  
DIN: 08878724**

**Enclosed: As above**

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**Disclosures under Regulation 29(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Name of the Target Company (TC)/the Company	<b>Comfort Fincap Limited</b>		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	<b>Luharuka Investment and Consultants Private Limited</b>		
Whether the acquirer belongs to Promoter/Promoter group	<b>Yes</b>		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	<b>BSE Limited</b>		
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 (**)
<b><u>Before the acquisition under consideration, holding of:</u></b>			
a) Shares carrying voting rights	<b>39,00,000</b>	<b>6.25%</b>	<b>3.98%</b>
b) Shares in the nature of encumbrance (Pledge / lien / non-disposal undertaking / others)	Nil	N.A	N.A
c) Voting rights (VR) otherwise than by equity shares	Nil	N.A	N.A
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)	<b>2,00,00,000</b>	N.A	<b>20.39%</b>
<b>e) Total (a+b+c+d)</b>	<b>2,39,00,000</b>	<b>6.25%</b>	<b>24.37%</b>

<b><u>Details of acquisition / sale***</u></b>			
a) Shares carrying voting rights acquired <sup>#</sup> / sold	<b>65,00,000</b>	<b>8.74%</b>	<b>6.63%</b>
<b>#Conversion of warrants into equity shares pursuant to exercise of options attached thereto</b>			
b) VRs acquired / sold otherwise than by shares	Nil	N.A	N.A
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired / sold	Nil	N.A	N.A
d) Shares encumbered / invoked/released by the acquirer	Nil	N.A	N.A
<b>e) Total (a+b+c+d)</b>	<b>65,00,000</b>	<b>8.74%</b>	<b>6.63%</b>

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<b><u>After the-acquisition / sale, holding of:</u></b>			
a) Shares carrying voting rights	<b>1,04,00,000</b>	<b>13.99%</b>	<b>10.61</b>
b) Shares encumbered with the acquirer	Nil	N.A	N.A
c) VRs otherwise than by shares	Nil	N.A	N.A
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	<b>1,35,00,000</b>	N.A	<b>13.77%</b>
e) Total (a+b+c+d)	<b>2,39,00,000</b>	<b>13.99%</b>	<b>24.37%</b>
Mode of acquisition / <del>sale</del> (e.g. <del>open market / off-market / public issue / rights issue / preferential allotment / inter se transfer etc</del> ).	Conversion of warrants into Equity shares pursuant to exercise of options attached thereto.		
Date of acquisition / <del>sale of shares</del> / VR or date of receipt of intimation of allotment of shares, whichever is applicable	<b>No. of shares Acquired</b>	<b>% w.r.t. share capital</b>	<b>Date of Acquisition</b>
	65,00,000	8.74%	January 24, 2025
Equity share capital / total voting capital of the TC before the said acquisition / sale	6,23,81,500 Equity Shares of Rs. 2/- each		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	7,43,46,500 Equity Shares of Rs. 2/- each		
Total diluted share/voting capital of the TC after the said acquisition	9,80,56,500 Equity Shares of Rs. 2/- each		

(\*) 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 the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

(\*\*) 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.

(\*\*\*) the Comfort Fincap Limited has made allotment of 2,39,00,000 shares warrants through preferential allotment to the Company, followed by the conversion of a portion of the 1,04,00,000 warrants into equity shares till date.

**For Luharuka Investment and Consultants Private Limited**

**Apeksha Kadam**  
**Director**  
**DIN: 08878724**

**Place: Mumbai**  
**Date: January 24, 2025**