



DAGA COMMODITIES PRIVATE LIMITED

Member: National Commodity and Derivatives Exchange Ltd.
Regd Office: 114, New Delhi House, 27 Barakhamba Road, New Delhi-110001
E-Mail: compliance@dbonline.in Tel: 011-43606162, Fax: 011-23736162
CIN: U65910DL1996PTC354367

Date: 20.09.2023

To,
Mr. Rakesh Parekh,
Special Assistant-Listing Compliance
BSE Ltd.
P J Towers, Dalal Street,
Mumbai - 400001

Subject: Clarification for disclosure under Regulation 31 of SEBI (SAST) Regulations 2011


Dear Sir,

We have received a mail dated 14th September, 2023 wherein you have asked us a clarification that in the disclosure under Regulation 31 of SEBI (SAST) Regulations 2011, name of the company in whose favor shares are encumbered mentioned and name of Target Company whose shares pledge are same i.e DB International Stock Brokers Ltd.

It is hereby submitted that we have pledged my holding of DB (International) Stock Brokers Limited as a client of the Stock Broker - (DB (International) Stock Brokers Limited- SEBI Regn No. INZ000179035) and accordingly we have made disclosure within timeline to the Exchanges.

There is no error in the disclosure. You are requested to kindly take the above clarification on your records.

Thanking you,
For Daga Commodities Private Limited


(Prahlad Daga)
Authorised Signatory
Promoter



CC to:
Managing Director/Company Secretary
DB(International) Stock Brokers Limited
Unit No. 210/211/211A at 2nd Floor,
Dalal Street Commercial Cooperative Society Ltd,
Block No.53, Zone 5, Gift City, Gandhinagar,
Gujarat-382355

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Dated: 20th September, 2023

To,
Department of Corporate Services
BSE Limited,
Phiroze Jeejeebhoy Towers, Dalal Street
Mumbai-400001

Company Code: 530393

Sub: Revised Disclosure under Regulation 31(1) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.

Dear Sir/Madam,

This has reference to our disclosure made on dated 10th July, 2023 regarding disclosure under Regulation 31(1) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011, we wish to provide Revised Disclosure of our Company.

Pursuant to Disclosure made by Promoter(s) to the Stock Exchange and to the Target Company for encumbrance of Shares, in terms of Regulation 31(1) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011, we wish to inform that earlier Company mentioned the Details of events pertaining to encumbrance of Percentage (%) of Share Capital: **76.535%** which was calculated on the basis of total shareholding held by DAGA COMMODITIES PRIVATE LIMITED ("**Promoter**"). However, the **Revised Details of events pertaining to encumbrance of Percentage (%) of Share Capital: 1.858%**, it is calculated on the basis of total share encumbered of the Daga Commodities Private Limited ("**Promoter**") against the total share capital of the DB (INTERNATIONAL) STOCK BROKERS LIMITED ("**The Company**").

In continuation to our disclosure made on dated 10th July, 2023, Please find enclosed herewith Revised disclosure in terms of Regulation 31(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

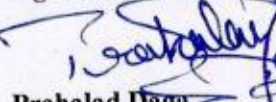

Further, Pursuant to the SEBI Circular no. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019; we are enclosing disclosure of reasons for encumbrance by the promoters and promoter group in respect of shares of DB (International) Stock Brokers Limited.

You are requested to review and take same on your records.

Thanking you,

Yours faithfully,

Signature of Authorised Signatory



Pralhad Daga
Daga Commodities Private Limited
Promoter

ANNEXURE - 1

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 31(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company(TC)	DB (International) Stock Brokers Limited
Names of the stock exchanges where the shares of the target company are listed	a) BSE Ltd. b) National Stock Exchange of India Limited
Date of reporting	Original Disclosure Date: 10/07/2023 Revised Disclosure Date: 20/09/2023
Name of the promoter or PAC on whose shares encumbrance has been created /released/invoked	DAGA COMMODITIES PRIVATE LIMITED

Details of the creation of encumbrance:

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 [(1)-(3)]}	
	Number	% of total share capital	Number	% of total share capital	Type of event (creation /release/ invocation / non-encumbrance)	Date of creation/ release/ invocation of encumbrance	Type of encumbrance (pledge/ lien/ non disposal undertaking/ others)	Reasons for encumbrance **	Number	% of share capital	Name of the entity in whose favor shares encumbered ***	Number	% of total share capital
DAGA COMMODITIES PRIVATE LIMITED	8,50,119	2.428%	0	0	Creation	5 th July, 2023	Pledge	For Margin of Shares	6,50,639	1.858%	Pledge of Equity Shares in favour of DB (International) Stock Brokers Limited	6,50,639	1.858%



Signature of the Authorized Signatory


PrahalaD Daga
Daga Commodities Private Limited



Place: New Delhi

Date of Revised Disclosure: 20/09/2023

Note: (**) 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.

(*) Total share 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.

Annexure-II

Format for disclosure of reasons for encumbrance

Name of listed company	DB (International) Stock Brokers Limited
Name of the recognised stock exchanges where the shares of the company are listed	a) BSE Ltd. b) National Stock Exchange of India Limited
Name of the promoter(s) / PACs whose shares have been encumbered	DAGA COMMODITIES PRIVATE LIMITED
Total promoter shareholding in the listed company	No. of Shares – 8,50,119 % of total share capital – 2.428%
Encumbered shares as a % of promoter shareholding	1.858%
Whether encumbered share is 50% or more of promoter shareholding	Yes
Whether encumbered share is 20% or more of total share capital	No

Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 1 (Date of creation of Encumbrance: <u>5th July, 2023</u>)	Encumbrance 2 (Add columns for each event/ agreement)
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	
No. and % of shares encumbered		No. of shares: 6,50,639 % of total share capital: 1.858%	
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	Pledge of Equity Shares in favour of DB (International) Stock Brokers Limited	
	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.	No Depository Participant/Stock Broker	
	Names of all other entities in the agreement	Listed company and its group companies (if any)-NA 1. 2. ... Other entities (if any) – NA 1. 2. ...	
	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	NO 1. Name of the issuer: NA	



		2.	Details of the debt Instrument: NA	
		3.	Whether the debt instrument is listed on Stock Exchanges? NA	
		4.	Credit Rating of the debt instrument: NA	
		5.	ISIN of the Instrument: NA	
Security Cover / Asset Cover	Value of shares on the date of event / agreement (A)		Rs. 1,56,02,323.22	
	Amount involved (against which shares have been encumbered) (B)		Rs. 1,56,02,323.22	
	Ratio of A / B		1:1	
End use of money	<p>Borrowed amount to be utilized for what purpose –</p> <p>(a) Personal use by promoters and PACs</p> <p>(b) For the benefit of listed company</p> <p>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.</p> <p>(a) Any other reason (please specify)</p>		For Margin of Shares	

Signature of Authorised Signatory:


Prahalad Daga
Daga Commodities Private Limited

Place: New Delhi

Date of Revised Disclosure: 20/09/2023