

April 18, 2022

To

Securities and Exchange Board of India,
SEBI Bhawan, Plot No. C4-A,
G- Block, Bandra Kurla Complex,
Bandra (East), Mumbai- 400051

Dear Sir/Madam,

Sub: Report under Regulation 10(7) of the Takeover Regulations, 2011

Please find enclosed herewith report under Regulation 10(7) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("**Takeover Regulations**"), for indirect acquisition under Regulation 10(1)(a)(i) of the Takeover regulations of 22.76% of the paid-up equity shares of Vardhman Polytex Limited ("**Target Company**" or "**TC**") pursuant to the acquisition of shares of certain companies forming part of the promoter group of the Target. Company ("**Promoter Companies**") as set out in **Annexure A1** and **Annexure A2** between immediate relatives.


Intimations under Regulation 10(5) and 10(6) have been filed with National Stock Exchange of India Limited/ BSE Limited on 23.03.2022 and 31.03.2022 respectively.

We are also enclosing herewith a demand draft no. 000037 dated 16-04-2022 for Rs. 1,50,000/- in favour of "Securities and Exchange Board of India" payable at Mumbai towards fee from Adish Oswal as required u/r 10(7) of Takeover Regulations.


A demand draft no. 472509 dated 16-04-2022 for Rs. 1,50,000/- in favour of "Securities and Exchange Board of India" payable at Mumbai is also enclosed towards additional fee from Manju Oswal as required u/r 10(7) of Takeover Regulations.

Kindly acknowledge the receipt.

Thanking you,
Yours faithfully,



Adish Oswal
(Promoter)



Manju Oswal
(Promoter)

Encl: As above

CC:

1. BSE Limited
2. National Stock Exchange of India Limited
3. Company Secretary, Vardhman Polytex Limited

Format under Regulation 10(7) - Report to SEBI in respect of any acquisition made in reliance upon exemption provided for in regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1 General Details		
a.	Name, address, telephone no., e-mail of acquirer(s) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond.}	Adish Oswal and Manju Oswal are acquirers. The name, address, telephone number and email of Adish Oswal, the correspondent acquirer, are set out below. Adish Oswal R/o 534, Spring Field College Road, Civil Lines, Ludhiana- 141001 Contact: 0161-6629888 Email: adish.oswal@vpl.in
b.	Whether sender is the acquirer (Y/N)	Yes
c.	If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization)	Not Applicable
d.	Name, address, Tel no. and e-mail of the sender, if sender is not the acquirer	Not Applicable
2 Compliance of Regulation 10(7)		
a.	Date of report	April 18, 2022
b.	Whether report has been submitted to SEBI within 21 working days from the date of the acquisition	Yes
c.	Whether the report is accompanied with fees as required under Regulation 10(7)	Yes
3 Compliance of Regulation 10(5)		
a.	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed, at least 4 working days before the date of the proposed acquisition	Yes
b.	Date of Report	March 23, 2022 (Copy enclosed as Annexure- A3)

4	Compliance of Regulation 10(6)			
	a.	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed within 4 working days after the date of the proposed acquisition	Yes	
	b.	Date of Report	March 31, 2022 (Copy enclosed as Annexure- A4)	
5	Details of the Target Company (TC)			
	a.	Name & address of TC	Name: Vardhman Polytex Limited Address: Vardhman Park, Chandigarh Road, Ludhiana- 141123	
	b.	Name of the Stock Exchange(s) where the shares of the TC are listed	BSE Limited National Stock Exchange of India Limited	
6	Details of the acquisition			
	a.	Date of acquisition	March 30, 2022	
	b.	Acquisition price per share (in Rs.)	Not applicable as direct acquisition of the shares of TC has not been done. Shares of the Promoter Companies were transferred by way of gift for nil consideration. Details pertaining to the share transfers have been set out in Annexure A1 and Annexure A2 enclosed herewith.	
	c.	Regulation which would have triggered an open offer, had the report not been filed under Regulation 10(7). (whether Regulation 3(1), 3(2), 4 or 5)	Regulation 3(2) read with Regulation 5	
	d.	Shareholding of acquirer(s) and PAC individually in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)(*) Name of the acquirer(s) / PAC (**) Acquirer: Adish Oswal	Before the acquisition	After the acquisition
			No. of Shares	% w.r.t total share capital of TC [@]
			No. of Shares	% w.r.t total share capital of TC [@]
		i. Adish Oswal	4,20,511	1.89%
		Person Acting in Concert (PAC) other than sellers/ Transferor(s):		
		i. Ashok Kumar Oswal	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.	Ashok Kumar and Sons, HUF	110	0.00%	110	0.00%
v.	Kent Investments Pvt. Ltd.	46,950	0.21%	46,950	0.21%
vi.	Enakshi Investments Pvt. Ltd.	3,70,250	1.66%	3,70,250	1.66%
vii.	Panchsheel Textile Mfg. and Trading Co. Pvt. Ltd.	44,26,917	19.86%	44,26,917	19.86%
viii.	Ruby Mercantile Co. Pvt. Ltd.	1,53,000	0.69%	1,53,000	0.69%
ix.	Calgary Investment and Trading Co. Pvt. Ltd.	67,300	0.30%	67,300	0.30%
x.	Nightnagle Dealcom Pvt. Ltd.	6,60,000	2.96%	6,60,000	2.96%
xi.	Gagan Mercantile Company Pvt. Ltd.	1,63,900	0.74%	1,63,900	0.74%
xii.	Pioneer Mercantile India Pvt. Ltd.	49,350	0.22%	49,350	0.22%
xiii.	Alfort Merchants Pvt. Ltd.	21,82,000	9.79%	21,82,000	9.79%
xiv.	Liberty Mercantile Co. Pvt. Ltd.	1,20,550	0.54%	1,20,550	0.54%
xv.	Boras Investment and Trading Co. Pvt. Ltd.	32,860	0.15%	32,860	0.15%
xvi.	Allepy Investment and Trading Co. Pvt. Ltd.	95,500	0.43%	95,500	0.43%
xvii.	Adesh Investment Trading Co. Pvt. Ltd.	35,100	0.16%	35,100	0.16%
xviii.	Alma Assets Consultancy Pvt. Ltd.	43,62,325	19.57%	43,62,325	19.57%
xix.	Amrante Trust through Rakhi Oswal, Trustee	5,139	0.02%	5,139	0.02%

Sellers/ Transferor(s):

i.	Manju Oswal	52,694	0.24%	52,694	0.24%
ii.	Abhinav Oswal	14,307	0.06%	14,307	0.06%

Acquirer: Manju Oswal

i.	Manju Oswal	52,694	0.24 %	52,694	0.24 %
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Person Acting in Concert (PAC) other than seller/ Transferor:

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.	Abhinav Oswal	14,307	0.06%	14,307	0.06%
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%

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	xi.	Nightnagle Dealcom Pvt. Ltd.	6,60,000	2.96%	6,60,000	2.96%
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	xx.	Amrante Trust through Rakhi Oswal, Trustee	5,139	0.02%	5,139	0.02%
	Seller/ Transferor:					
	Adish Oswal		4,20,511	1.89%	4,20,511	1.89%
e.	Shareholding of seller(s)/transferor(s) in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)(*)		Before the acquisition		After the acquisition	
			No. of Shares	% w.r.t total share capital of TC®	No. of Shares	% w.r.t total share capital of TC®
	When Acquirer: Adish Oswal					
	Name of the seller(s)/ transferor(s)(**)					
	1) Manju Oswal		52,694	0.24%	52,694	0.24%
	2) Abhinav Oswal		14,307	0.06%	14,307	0.06%
	When Acquirer: Manju Oswal					
	Name of the seller/ transferor (**)					
	1) Adish Oswal		4,20,511	1.89%	4,20,511	1.89%


	<p>Each of the acquirers above have not directly acquired any shares of the TC.</p> <p>This Report/disclosure is being made pursuant to the indirect inter-se transfer of shares of the Promoter Companies (as set out in Annexure A1 and Annexure A2) which caused 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 for nil consideration between</p> <p>(a) Adish Oswal, the acquirer and the sellers (who are his immediate relatives) i.e., – his mother, Manju Oswal, and his brother, Abhinav Oswal; and</p> <p>(b) Manju Oswal, the acquirer and the seller (who is her immediate relative) – i.e., her son, Adish Oswal.</p> <p>No changes have taken place in the shareholding pattern of TC since the transfers have been undertaken at an indirect level (i.e., transfer of shares of the Promoter Companies); but the shareholding of the Promoter Companies (which are part of the Promoter Group) has changed as per Annexure-A1 and Annexure A2. In this regard, note that 22.76% of the shares carrying voting rights/the paid-up equity shareholding of TC has been acquired indirectly on account of the acquisition of shares of the Promoter Companies. Please refer to Annexure-A1, Note 1.</p> <p>Additionally, please refer to Annexure-A1 and A2 for details on the percentage of shares of each Promoter Companies acquired by the acquirers.</p> <p>@Represented as per the shareholding pattern filed by the TC with the BSE Limited for the quarter ending December 31, 2021.</p>			
7	Information specific to the exemption category to which the instant acquisition belongs- Regulation 10(1)(a)(i)			
	<table border="1"> <tr> <td data-bbox="177 1301 240 1615">a.</td> <td data-bbox="240 1301 847 1615">Provide the names of the seller(s)/ transferor(s)</td> <td data-bbox="847 1301 1481 1615"> <p><u>When Acquirer: Adish Oswal</u></p> <ol style="list-style-type: none"> 1. Manju Oswal 2. Abhinav Oswal <p><u>When Acquirer: Manju Oswal</u></p> <ol style="list-style-type: none"> 1. Adish Oswal </td> </tr> </table>	a.	Provide the names of the seller(s)/ transferor(s)	<p><u>When Acquirer: Adish Oswal</u></p> <ol style="list-style-type: none"> 1. Manju Oswal 2. Abhinav Oswal <p><u>When Acquirer: Manju Oswal</u></p> <ol style="list-style-type: none"> 1. Adish Oswal
a.	Provide the names of the seller(s)/ transferor(s)	<p><u>When Acquirer: Adish Oswal</u></p> <ol style="list-style-type: none"> 1. Manju Oswal 2. Abhinav Oswal <p><u>When Acquirer: Manju Oswal</u></p> <ol style="list-style-type: none"> 1. Adish Oswal 		
	<table border="1"> <tr> <td data-bbox="177 1615 240 1982">b.</td> <td data-bbox="240 1615 847 1982">Specify the relationship between the acquirer(s) and the seller(s)/ transferor(s).</td> <td data-bbox="847 1615 1481 1982"> <p>Adish Oswal has acquired shares of the Promoter Companies from:</p> <ol style="list-style-type: none"> 1. Manju Oswal, mother of Adish Oswal 2. Abhinav Oswal, brother of Adish Oswal <p>Manju Oswal has acquired shares of the Promoter Companies from Adish Oswal, son of Manju Oswal</p> </td> </tr> </table>	b.	Specify the relationship between the acquirer(s) and the seller(s)/ transferor(s).	<p>Adish Oswal has acquired shares of the Promoter Companies from:</p> <ol style="list-style-type: none"> 1. Manju Oswal, mother of Adish Oswal 2. Abhinav Oswal, brother of Adish Oswal <p>Manju Oswal has acquired shares of the Promoter Companies from Adish Oswal, son of Manju Oswal</p>
b.	Specify the relationship between the acquirer(s) and the seller(s)/ transferor(s).	<p>Adish Oswal has acquired shares of the Promoter Companies from:</p> <ol style="list-style-type: none"> 1. Manju Oswal, mother of Adish Oswal 2. Abhinav Oswal, brother of Adish Oswal <p>Manju Oswal has acquired shares of the Promoter Companies from Adish Oswal, son of Manju Oswal</p>		

c.	Confirm whether the acquirer(s) and the seller(s)/ transferor(s) are 'immediate relatives' as defined in the Regulation 2(l).	Yes
d.	If shares of the TC are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	Not applicable as direct acquisition of the shares of TC has not been undertaken. Shares of the Promoter Companies were transferred by way of gift for nil consideration.
e.	If the shares of the TC are infrequently traded, the price of such shares as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not applicable as direct acquisition of the shares of TC has not been undertaken. Shares of the Promoter Companies were transferred by way of gift for nil consideration.
f.	Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (d) or (e) above as applicable.	Not applicable as direct acquisition of the shares of TC has not been undertaken. Shares of the Target Company were indirectly acquired by way of gift for nil consideration.
g.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	Intimation under Regulation 10 (5) of the Takeover Regulations was made to the National Stock Exchange of India Limited and the BSE Limited on March 23, 2022.
h.	1) Whether the acquirers as well as seller(s)/ transferor(s) have complied (during 3 years prior to the date of acquisition) with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). 2) If yes, specify applicable regulation(s) as well as date on which the requisite disclosures were made and furnish copies of the same.	Yes, complied. <u>Regulation 30:</u> 1). Annual disclosure dated April 1, 2021 2). Annual disclosure dated May 25, 2020 3). Annual disclosure dated April 1, 2019 <u>Regulation 31:</u> FY 2019-20 - Initial disclosure for encumbrance FY 2020-21 - Annual disclosure of encumbrance Copies of above are enclosed herewith as Annexure- B (Colly).


	i. Declaration by the acquirer that all the conditions specified under regulation 10(1)(a)(i) with respect to exemptions has been duly complied with.	We hereby declare that all the conditions specified under regulation 10(1)(a)(i) with respect to exemptions have been duly complied with.
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We hereby declare that the information provided in the instant report is true and nothing has been concealed there from.

Signature:



 Adish Oswal
 (Promoter)



 Manju Oswal
 (Promoter)

Date: April 18, 2022

Place: Ludhiana

NOTE:

- (*) In case, percentage of shareholding to the total capital is different from percentage of voting rights, indicate percentage of shareholding and voting rights separately.
- (**) Shareholding of each entity shall be shown separately and then collectively in a group.

The following abbreviations have been used all through the document: TC stands for 'Target Company', 'Takeover Regulations' stands for 'SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011'.



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Date

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Navdeep Singh

21/9/21 को या उनके आदेश पर/ OR ORDER

ON DEMAND PAY/ मांगे जाने पर

Ludhiana Sector 32A

REF. No. 257513000041

रुपये Rupees

SECURITIES AND EXCHANGE- BOARD OF INDIA

₹

150000/-

ONE LAKH FIFTY THOUSAND ONLY.

For AU Small Finance Bank Ltd

*1,50,000

Purchaser Name: ADISH OSWAL

DRAWEE BRANCH AND CODE

Mumbai Andheri Kurla Road

AUTHORISED SIGNATORY

प्राधिकृत हस्ताक्षरकर्ता

Emp. 24/5/21

AUTHORISED SIGNATORY

प्राधिकृत हस्ताक्षरकर्ता

Please sign above

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(जारीकर्ता शाखा / ISSUING BRANCH)

LUDHIANA - VARDHMAN(05908)

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इंडियन बैंक की सभी शाखाओं में सममूल्य पर देय। App Name: MANJU OSWAL *****

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LUDHIANA - VARDHMAN BRANCH
05908

Manveen
82913
अधिकृत हस्ताक्षरकर्ता
Authorised Signatory (S.S. No.)

Manveen
7171695
अधिकृत हस्ताक्षरकर्ता
Authorised Signatory (S.S. No.)

Please sign above

T21/MDDE

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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 transferred	Consideration
Adish Oswal	Manju Oswal	3820	38.20	By way of Gift
Adish Oswal	Abhinav Oswal	3800	38.00	By way of Gift
			76.20	

**% 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 transferred	Consideration
Adish Oswal	Manju Oswal	12965	72.05	By way of Gift
			72.05	

**% 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 transferred	Consideration
Adish Oswal	Manju Oswal	4300	43.00	By way of Gift
Adish Oswal	Abhinav Oswal	4000	40.00	By way of Gift
			83.00	

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

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 transferred	Consideration
Adish Oswal	Manju Oswal	2000	79.62	By way of Gift
			79.62	

% 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 transferred	Consideration
Adish Oswal	Manju Oswal	4400	44.00	By way of Gift
Adish Oswal	Abhinav Oswal	3500	35.00	By way of Gift
			79.00	

% 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 transferred	Consideration
Adish Oswal	Manju Oswal	6800	68.00	By way of Gift
Adish Oswal	Abhinav Oswal	3000	30.00	By way of Gift
			98.00	

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

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 transferred	Consideration
Adish Oswal	Manju Oswal	8802	44.01	By way of Gift
Adish Oswal	Abhinav Oswal	5000	25.00	By way of Gift
			69.01	

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

8 In ALLEPY 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 transferred	Consideration
Adish Oswal	Manju Oswal	6000	76.45	By way of Gift
			76.45	

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

**% 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 indirect acquisition by Adish Oswal of the voting share capital of the TC on account of the 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 (being part of promoter group)	Name of Transferor (being part of promoter group)	No. of Equity Shares	% of shareholding of the Promoter Company transferred	Consideration
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 transfer set out above and will continue to be under the control of Manju Oswal post the transfer set out above.

Ajay Ratra

From: Ajay Ratra <ajay.ratra@vpl.in>
Sent: Wednesday, March 23, 2022 12:07 PM
To: 'takeover@nse.co.in'; 'corp.relations@bseindia.com'
Subject: 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
Attachments: SAST_Regulation_10(5)_Intimation_23March2022.pdf

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)

Date: March 23, 2022

To,
The Manager,

BSE Limited Corporate Relationship Department, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001 Scrip Code: 514175	National Stock Exchange of India Limited 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 Annexure A1 and Annexure A2) (hereinafter "Promoter Companies") 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 th 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 Annexure-A1 and Annexure-A2 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 Annexure-A1, Note 1</p> <p>Additionally, please refer to Annexure-A1 and A2 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 Annexure-B (Colly)</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.	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	<p><u>Acquirer: Adish Oswal:</u></p> <p>Acquirer(s) and PACs (other than sellers) (*)</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. Alfort 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	Sellers				
	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**
	Acquirer: Manju Oswal:				
	Acquirer(s) and PACs (other than sellers) (*)				
	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.	Alfort 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	Seller				
	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
			76.20	

% 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
			72.05	

% 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
			83.00	

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
			79.62	

**% 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
			79.00	

**% 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
			98.00	

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
			69.01	

8 In ALLEPY 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	6000	76.45	By way of Gift
			76.45	

**% 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 (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	9022	36.00	By way of Gift
Adish Oswal	Abhinav Oswal	5	0.02	By way of Gift
			36.02	

**% 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 (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
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, NATIONAL STOCK EXCHANGE OF INDIA LTD, "Exchange Plaza" Bandra - Kurla Complex, Bandra (East), Mumbai- 400 051 Scrip Code: VARDMPOLY	The Listing Department, BSE LIMITED 25th Floor, P.J. Towers, Dalal Street, Fort, Mumbai- 400 001 Scrip Code: 514175
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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		VARDHMAN POLYTEX LIMITED BSE Listed (514773) National Stock Exchange of India Ltd (VARDHMANO.V)	
1	Name of the Target Company (TC) (Name(s) of the stock exchange(s) where the shares of the TC are listed)		
2	Name of person(s) together with Person 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 or		
3	Name(s) of promoter(s), member of the promoter group and PAC with their		
1	Mr. Adish Desai	1	1.89%
2	Mr. Ashok Kumar Oswal	2	0.57%
3	Mrs. Marylu Desai	3	0.24%
4	Mrs. Rashmi Desai	4	0.09%
5	Ms. Alupa Desai	5	0.08%
6	Mr. Ashish Desai	6	0.02%
7	Panchabhai Text. Mills & Trdg. Co. (P) Ltd	7	0.00%
8	Arns Assets Consultancy (P) Ltd	8	19.86%
9	Arns Assets Consultancy (P) Ltd	9	19.86%
10	Arns Assets Consultancy (P) Ltd	10	19.87%
11	Highbridge Deskcom (P) Ltd	11	19.57%
12	Arns Assets Consultancy (P) Ltd	12	2.96%
13	Arns Assets Consultancy (P) Ltd	13	2.89%
14	Arns Assets Consultancy (P) Ltd	14	2.89%
15	Arns Assets Consultancy (P) Ltd	15	2.89%
16	Arns Assets Consultancy (P) Ltd	16	2.89%
17	Arns Assets Consultancy (P) Ltd	17	2.89%
18	Arns Assets Consultancy (P) Ltd	18	2.89%
19	Arns Assets Consultancy (P) Ltd	19	2.89%
20	Arns Assets Consultancy (P) Ltd	20	2.89%
21	Arns Assets Consultancy (P) Ltd	21	2.89%
22	Arns Assets Consultancy (P) Ltd	22	2.89%
GRAND TOTAL			
Total		13414632	60.15%
Voting Rights (conferred from by shares)			
Promoter			
Conventio Securities			
Any other instrument that would entitle the holder to acquire shares in the TC			
Total		13414632	60.15%

(1) Below shareholding capital means the total number of shares in the TC assuming full conversion of the outstanding convertible warrants into equity shares of the TC.
 (2) Mr. Ashok Kumar Oswal acquired on 16.11.2018 and the possession of the shares held in his own name and that of Mr. Ashok Kumar & Sons is yet to be received.
 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

 ANISH DESAI
 Authorized Signatory

Place: LUDHIANA
 Date: 01/04/2021

Part-B**

Sr no.	Name of the Target Company: Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs Promoter/Promoter group	PAN of the person and to PACs
		VARDHMAN POLYTEX LIMITED	
1	Panchsheel Tex. Mfg. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACF1849C
2	Almi Assets Consultancy (P) Ltd	Promoter/Promoter Group	AAJCK1863C
3	Akhil Merchants (P) Ltd.	Promoter/Promoter Group	AAICAB847L
4	Nightingale Dealcom (P) Ltd	Promoter/Promoter Group	AAACN8938R
5	Erakshi Investments (P) Ltd.	Promoter/Promoter Group	AAACE4068H
6	Ocean Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACG8654M
7	Ruby Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACR8016L
8	Liberty Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACL3102F
9	Alamy Invest. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACA2470N
10	Calgary Invest. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACD8149B
11	Pioneer Mercantile Co. (P) Ltd	Promoter/Promoter Group	AAACP0010H
12	Kent Investments (P) Ltd.	Promoter/Promoter Group	AAACK7413G
13	Adesh Invest. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACA8277H
14	Borax Invest. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACB4722H
15	Mr. Adesh Oswal	Promoter/Promoter Group	AAACP08407D
16	Mr. Ashok Kumar Oswal	Promoter/Promoter Group	AAACP08408C
17	Mrs. Manju Oswal	Promoter/Promoter Group	AAACP08418F
18	Mrs. Rakhi Oswal	Promoter/Promoter Group	AFWPK8459Q
19	Mr. Ashish Oswal	Promoter/Promoter Group	AAJPO0573B
20	Ms Akshita Oswal	Promoter/Promoter Group	AAJPO0878B
21	Ashok Kumar & Sons (HUF)	Promoter/Promoter Group	AAGHA7592F
22	Amranta 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


(ADESH OSWAL)
Authorized Signatory

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

(*) Divided 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

The Listing Department, NATIONAL STOCK EXCHANGE OF INDIA LTD, "Exchange Plaza" Bandra - Kurla Complex, Bandra (East), Mumbai- 400 051 Scrip Code: VARDMNPOLY	The Listing Department, BSE LIMITED 25th Floor, P.J. Towers, Dalal Street, Fort, Mumbai- 400 001 Scrip Code: 514175
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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

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 (914778) National Stock Exchange of India Ltd (VARDHMPOLY)		
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.	NA		
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	Nightshade Dealoom (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 Invt. & Trdg. Co. (P) Ltd.	
		10	Calgary Invt. & Trdg. Co. (P) Ltd.	
		11	Pioneer Mercantile Co. (P) Ltd.	
		12	Kent Investments (P) Ltd.	
		13	Adesh Invt. & Trdg. Co. (P) Ltd.	
		14	Boras Invt. & 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 capital wherever applicable	% of total diluted share/voting capital of TC (*)
	As of March 31, 2028, 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	52684	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	8460	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	Nightshade Dealoom (P) Ltd	680000	2.89%	2.96%
12	Enakshi Investments (P) Ltd.	370250	1.68%	1.68%
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.	120950	0.54%	0.54%
16	Allepy Invt. & Trdg. Co. (P) Ltd.	85500	0.43%	0.43%
17	Calgary Invt. & Trdg. Co. (P) Ltd.	67300	0.30%	0.30%
18	Pioneer Mercantile Co. (P) Ltd.	48300	0.22%	0.22%
19	Kent Investments (P) Ltd.	46950	0.21%	0.21%
20	Adesh Invt. & Trdg. Co. (P) Ltd.	35100	0.16%	0.16%
21	Boras Invt. & Trdg. Co. (P) Ltd.	32860	0.15%	0.15%
22	Amrante Trust (through Trustee- Mrs. Rakhi Oswal)	10000	0.04%	0.04%
	GRAND-TOTAL	13414862	60.18%	60.18%
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
	Total	13414862	60.18%	60.18%

(*) 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)
 Authorized Signatory

Place: LUDHIANA
 Date: 23.08.2028

Part-B**

Sr no.	Name of the Target Company: Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to PACs	PAN of the person and to PACs
		VARDHMAN POLYTEX LIMITED	
1	Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.	Promoter/Promoter Group	AAACP9949C
2	Alma Assala Consultancy (P) Ltd	Promoter/Promoter Group	AAJCK1963C
3	Aikfort Merchants (P) Ltd.	Promoter/Promoter Group	AAICA9847L
4	Nightingale Dealcom (P) Ltd	Promoter/Promoter Group	AACCN8938R
5	Enakshi Investments (P) Ltd.	Promoter/Promoter Group	AAACE4006R
6	Gagan Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACG8654M
7	Ruby Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACR8016L
8	Liberty Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACL3102F
9	Altepy 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	AAJCP0010H
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	AACP08487D
16	Mr. Ashok Kumar Oswal	Promoter/Promoter Group	AACP08466C
17	Mrs. Manju Oswal	Promoter/Promoter Group	AADPO0618F
18	Mrs. Rakhi Oswal	Promoter/Promoter Group	AFVWP6455Q
19	Mr. Abhinav Oswal	Promoter/Promoter Group	AAJPO0573B
20	Ms Aketa Oswal	Promoter/Promoter Group	AAJPO0676J
21	Ashok Kumar & Sons (HUF)	Promoter/Promoter Group	AAGHA7592F
22	Aurante Trust (through Trustee- Mrs. Rakhi Oswal)	Promoter/Promoter Group	AAFTA9694F

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

The Listing Department, NATIONAL STOCK EXCHANGE OF INDIA LTD, "Exchange Plaza" Bandra – Kurla Complex, Bandra (East), Mumbai- 400 051 Scrip Code: VARDMNPOLY	The Listing Department, BSE LIMITED 25th Floor, P.J. Towers, Dalal Street, Fort, Mumbai- 400 001 Scrip Code: 514175
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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)	VARDHMAN POLYTEX LIMITED		
2	Name(s) of the stock exchange(s) where the shares of the TC are listed	BSE Limited (614476) 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 Textile Manufacturing & Trading Co. (P) Ltd.	
		2	Alma Assets Consultancy (P) Ltd	
		3	Affort 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	Alopy Invest. & Trdg. Co. (P) Ltd	
		10	Calgary Invest. & Trdg. Co. (P) Ltd	
		11	Pioneer Mercantile Co. (P) Ltd	
		12	Kent Investments (P) Ltd	
		13	Adesh Invest. & Trdg. Co. (P) Ltd.	
		14	Boras Invest. & 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, 2019, holding of:			
a)	Shares			
1	Mr. Adish Oswal	420511	1.88%	1.88%
2	Mr. Ashok Kumar Oswal	127748	0.57%	0.57%
3	Mrs. Manju Oswal	52684	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	4428917	19.86%	19.86%
9	Alma Assets Consultancy (P) Ltd	4362325	19.57%	19.57%
10	Affort 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	Alopy Invest. & Trdg. Co. (P) Ltd.	85500	0.43%	0.43%
17	Calgary Invest. & 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.	48950	0.21%	0.21%
20	Adesh Invest. & Trdg. Co. (P) Ltd	35100	0.16%	0.16%
21	Boras Invest. & Trdg. Co. (P) Ltd.	32860	0.15%	0.15%
22	Amrante Trust (through Trustee- Mrs. Rakhi Oswal)	10000	0.04%	0.04%
	GRAND-TOTAL	13414662	60.18%	60.18%
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
	Total	13414662	60.18%	60.18%

(*) 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	Whether the person belongs to Promoter/Promoter group	PAN of the person and PACs
	VARDHMAN POLYTEX LIMITED		
1	Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.	Promoter/Promoter Group	AAACP8949C
2	Alma Assets Consultancy (P) Ltd	Promoter/Promoter Group	AAADCK1963C
3	Allfort Merchants (P) Ltd.	Promoter/Promoter Group	AAAC98847I
4	Nightingale Deacon (P) Ltd	Promoter/Promoter Group	AACCN5936H
5	Enakshi Investments (P) Ltd.	Promoter/Promoter Group	AAACE4008R
6	Capan Mercantile Co. (P) Ltd	Promoter/Promoter Group	AAACC6654M
7	Ruby Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACR8016L
8	Liberty Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACL3102F
9	Allegry Invest & Trdg. Co (P) Ltd	Promoter/Promoter Group	AABCA2470N
10	Calgary Invest & 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	Adash Invest & Trdg. Co (P) Ltd.	Promoter/Promoter Group	AABCA0277H
14	Boras Invest & Trdg. Co (P) Ltd.	Promoter/Promoter Group	AAACB4722H
15	Mr. Adish Oswal	Promoter/Promoter Group	AACP08407J
16	Mr. Ashok Kumar Oswal	Promoter/Promoter Group	AACP08406C
17	Mrs. Manju Oswal	Promoter/Promoter Group	AAADP0618F
18	Mrs. Rakhi Oswal	Promoter/Promoter Group	AFWPK6455Q
19	Mr. Abhinav Oswal	Promoter/Promoter Group	AAJPD0573B
20	Ms Aketa Oswal	Promoter/Promoter Group	AAXP06768J
21	Ashok Kumar & Sons (HUF)	Promoter/Promoter Group	AAGHA7582F
22	Amrante Trust (through Trustees- Mrs. Rakhi Oswal)	Promoter/Promoter Group	AAFTA8894F

For and on behalf of Promoter Group of Vardhman Polytex Ltd


(ADISH OSWAL)
Authorized SignatoryPlace: 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

Secretarial

From: "Secretarial" <secretarial@vpl.in>
Date: Thursday, March 31, 2022 2:12 PM
To: <takeover@nse.co.in>; <corp.relations@bseindia.com>
Cc: "Ajay Ratra" <ajay.ratra@vpl.in>
Attach: SAST_Reg_10(6)_31.03.2022.pdf
Subject: Disclosure under Regulation 10 (6) of SEBI (SAST) Regulations, 2011

Dear Sir/Madam,

Please find attached herewith the Disclosure required under Regulation 10 (6) of SEBI (Substantial Acquisition of Shares and Takeover), Regulations, 2011.

This is for your information and records.

Regards,

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

15-04-2022

Date: March 31, 2022

<p>The Manager, BSE Limited Corporate Relationship Department, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001</p> <p>Scrip Code: 514175</p>	<p>The Manager, National Stock Exchange of India Limited Exchange Plaza, 5th Floor, Plot No.C/1, G Block, Bandra-Kurla Complex, Bandra(E), Mumbai-400051</p> <p>Symbol: VARDMNPOLY</p>
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Sub: Report under Regulation 10(6) in respect of the 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(6) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("Takeover Regulations") in respect of 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 the 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(6) – Report to Stock Exchanges in respect of any 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 transaction including rationale, if any, for the transfer/acquisition of shares	<p>The acquirers have not directly acquired any shares of the TC.</p> <p>This disclosure is being made pursuant to the inter-se transfer of shares of companies which form part of the promoter group of the TC (as set out in Annexure A1 and Annexure A2) (hereinafter “Promoter Companies”) which caused an indirect acquisition of shares carrying voting rights of the TC. This 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.</p>	
5.	Relevant regulation under which the acquirer is exempted from making open offer	Regulation 10 (1) (a) (i) of SEBI (SAST) Regulations, 2011	
6.	Whether disclosure of the proposed acquisition was required to be made under Regulation 10 (5) and if so, - Whether disclosure was made and whether it was made within the timeline specified under Regulations. - Date of filing with the stock exchanges	<p>Disclosure of the proposed acquisition was required to be made under Regulation 10 (5).</p> <p>- Disclosure was made within timeline specified under Regulation 10 (5).</p> <p>- Date of filing with stock exchanges is 23.03.2022</p>	
7	Details of acquisition	Disclosures required to made under Regulation 10(5)	Whether the disclosures under Regulation 10(5) are actually made
	a) Name of Transferor/Seller	1). Adish Oswal 2). Manju Oswal 3). Abhinav Oswal	1). Adish Oswal 2). Manju Oswal 3). Abhinav Oswal
	b) Date of Acquisition:- 30 th March, 2022	On or after 30 th March, 2022	30 th March, 2022

	c)	Number of shares/voting rights in respect of acquisitions from each person mentioned in 7 (a) above:	Shares of the TC are not acquired directly. Please refer Annexure-A1 and Annexure-A2 for details on the number of shares of each Promoter Company acquired from each person mentioned in 7(a) above.	Shares of the TC are not acquired directly. Please refer Annexure-A1 and Annexure-A2 for details on the number of shares of each Promoter Company acquired from each person mentioned in 7(a) above.		
	d)	Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC:	Shares of the TC are not acquired directly. However, 22.76% of the paid-up equity shareholding of TC is acquired indirectly on account of the acquisition of shares of the Promoter Companies. Please refer to Annexure-A1, Note 1 Additionally, please refer to Annexure-A1 and A2 for details on the percentage of shares of each Promoter Company acquired by the acquirers.	Shares of the TC are not acquired directly. However, 22.76% of the paid-up equity shareholding of TC is acquired indirectly on account of the acquisition of shares of the Promoter Companies. Please refer to Annexure-A1, Note 1 Additionally, please refer to Annexure-A1 and A2 for details on the percentage of shares of each Promoter Company acquired by the acquirers.		
	e)	Price at which shares are proposed to be acquired / actually acquired:	Not applicable as direct acquisition of the shares of TC is not done. Shares of the Promoter Companies are transferred by way of gift for nil consideration.	Not applicable as direct acquisition of the shares of TC is not done. Shares of the Promoter Companies are transferred by way of gift for nil consideration.		
8.	Shareholding details		Pre-Transaction	Post-Transaction		
			No. of shares held	% w.r.t total share capital of TC	No. of shares held	% w.r.t total share capital of TC
	a	Acquirer: Adish Oswal: Acquirer(s) and PACs (other than sellers) (*)				
		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.	Nighnagle 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.	Alleppey 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	Sellers				
	i.	Manju Oswal	52,694	0.24 %	52,694	0.24 %
	ii.	Abhinav Oswal	14,307	0.06%	14,307	0.06%
	Shareholding details		Pre-Transaction		Post-Transaction	
			No. of shares held	% w.r.t total share capital of TC	No. of shares held	% w.r.t total share capital of TC
a	Acquirer: Manju Oswal:					
	Acquirer(s) and PACs (other than sellers) (*)					
	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	Seller					
	i.	Adish Oswal	4,20,511	1.89%	4,20,511	1.89%

Note A:

No changes have taken place in the shareholding pattern of TC, since the transfers have been done 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) has changed as per Annexure-A.

Note B:

() Shareholding of each entity shall 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 Polytext Limited

Place: Ludhiana
Date: 31.03.2022

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 transferred	Consideration
Adish Oswal	Manju Oswal	3820	38.20	By way of Gift
Adish Oswal	Abhinav Oswal	3800	38.00	By way of Gift
			76.20	

**% 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 transferred	Consideration
Adish Oswal	Manju Oswal	12965	72.05	By way of Gift
			72.05	

**% 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 Redemable Preference Shares (Serles-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 transferred	Consideration
Adish Oswal	Manju Oswal	4300	43.00	By way of Gift
Adish Oswal	Abhinav Oswal	4000	40.00	By way of Gift
			83.00	

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

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 transferred	Consideration
Adish Oswal	Manju Oswal	2000	79.62	By way of Gift
			79.62	

% 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 transferred	Consideration
Adish Oswal	Manju Oswal	4400	44.00	By way of Gift
Adish Oswal	Abhinav Oswal	3500	35.00	By way of Gift
			79.00	

% 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 transferred	Consideration
Adish Oswal	Manju Oswal	6800	68.00	By way of Gift
Adish Oswal	Abhinav Oswal	3000	30.00	By way of Gift
			98.00	

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

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 transferred	Consideration
Adish Oswal	Manju Oswal	8802	44.01	By way of Gift
Adish Oswal	Abhinav Oswal	5000	25.00	By way of Gift
			69.01	

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

8 In ALLEPY 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 transferred	Consideration
Adish Oswal	Manju Oswal	6000	76.45	By way of Gift
			76.45	

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

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

% of Voting Capital of
the TC

22.76

Annexure - A2

1 In ENAKSHI INVESTMENTS PVT. LTD.

(part of Promoter Group)

% Holding in TC

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 transferred	Consideration
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 transfer set out above and will continue to be under the control of Manju Oswal post the transfer set out above.

Annexure - B (Copy)

Ajay Ratra

From: Ajay Ratra <ajay.ratra@vpl.in>
Sent: Thursday, April 1, 2021 3:45 PM
To: 'takeover@nse.co.in'; 'corp.relations@bseindia.com'
Cc: 'secretarial@vpl.in'
Subject: Notice/disclosure u/r 30(1), 30(2) and 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011) - Vardhman Polytex Limited
Attachments: SAST_Reg30_March2021.pdf; SAST_Reg31(4)_March2021.pdf

Dear Sir/ Madam,

Please find enclosed herewith notice/disclosure under Regulation 30(1), 30(2) and 31(4) 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 in Vardhman Polytex Limited.

Kindly Acknowledge the Receipt.

Regards,

Adish Oswal

Date: 01-04-2021

The Listing Department,
NATIONAL STOCK EXCHANGE OF INDIA LTD,
"Exchange Plaza"
Bandra - Kurla Complex,
Bandra (East),
Mumbai- 400 051
Scrip Code: VARDMNPOLY

The Listing Department,
BSE LIMITED
25th Floor,
P.J. Towers,
Dalal Street, Fort,
Mumbai- 400 001

Scrip Code: 514175

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
(Authorized 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		YARDHMAN POLYTEX LIMITED		
2		BSE Limited (514175)		
		National Stock Exchange of India Ltd (YARDMNPOLY)		
3		N.A		
a)		N.A		
b)		N.A		
4		Number of shares	% w.r.t. total share voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31, 2021, 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 Tex. Mfg. & Trdg. Co. (P) Ltd.	4426917	19.86%	19.86%
9	Alma Assets Consultancy (P) Ltd	4362325	19.57%	19.57%
10	Ailfort Merchants (P) Ltd.	2182000	9.79%	9.79%
11	Nightnagle 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	Amranke Trust (through Trustee- Mrs. Rakhi Oswal)	10000	0.04%	0.04%
GRAND-TOTAL		13414652	60.18%	60.18%
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
Total		13414652	60.18%	60.18%

(*) 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: Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to PACs	PAN of the person and PACs
		Promoter/Promoter Group	VARDHMAN POLYTEX LIMITED
1	Panchsheel Tex. Mfg. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAAC9849C
2	Alma Assets Consultancy (P) Ltd.	Promoter/Promoter Group	AADCK1963C
3	Allfort Merchants (P) Ltd.	Promoter/Promoter Group	AAICA9847L
4	Nightingale Dealcorn (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	Allapy Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AABCA2470N
10	Calgary Invst. & Trdg. Co. (P) Ltd.	Promoter/Promoter Group	AAACC8149B
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	AAACB4722H
16	Mr. Ashok Kumar Oswal	Promoter/Promoter Group	AAACB4722H
17	Mrs. Manju Oswal	Promoter/Promoter Group	AADPO618F
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	AAGHA7502F
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: 01.04.2021

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

Ajay Ratra

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_disckosure_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 (514173) National Stock Exchange of India Ltd (VARDMPOLY)																																														
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.	<table border="1"> <tr><td>1</td><td>Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.</td></tr> <tr><td>2</td><td>Alma Assets Consultancy (P) Ltd</td></tr> <tr><td>3</td><td>Altfort Merchants (P) Ltd.</td></tr> <tr><td>4</td><td>Nightnagle Dealcom (P) Ltd</td></tr> <tr><td>5</td><td>Enakshi Investments (P) Ltd.</td></tr> <tr><td>6</td><td>Gagan Mercantile Co. (P) Ltd.</td></tr> <tr><td>7</td><td>Ruby Mercantile Co. (P) Ltd.</td></tr> <tr><td>8</td><td>Liberty Mercantile Co. (P) Ltd.</td></tr> <tr><td>9</td><td>Allepy Invst. & Trdg. Co. (P) Ltd.</td></tr> <tr><td>10</td><td>Calgary Invst. & Trdg. Co. (P) Ltd.</td></tr> <tr><td>11</td><td>Pioneer Mercantile Co. (P) Ltd.</td></tr> <tr><td>12</td><td>Kent Investments (P) Ltd.</td></tr> <tr><td>13</td><td>Adesh Invst. & Trdg. Co. (P) Ltd.</td></tr> <tr><td>14</td><td>Boras Invst. & Trdg. Co. (P) Ltd.</td></tr> <tr><td>15</td><td>Mr. Adish Oswal</td></tr> <tr><td>16</td><td>Mr. Ashok Kumar Oswal#</td></tr> <tr><td>17</td><td>Mrs. Manju Oswal</td></tr> <tr><td>18</td><td>Mrs. Rakhi Oswal</td></tr> <tr><td>19</td><td>Mr. Abhinav Oswal</td></tr> <tr><td>20</td><td>Ms Aketa Oswal</td></tr> <tr><td>21</td><td>Ashok Kumar & Sons (HUF)#</td></tr> <tr><td>22</td><td>Amrante Trust (through Trustee- Mrs. Rakhi Oswal)</td></tr> </table>			1	Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.	2	Alma Assets Consultancy (P) Ltd	3	Altfort Merchants (P) Ltd.	4	Nightnagle 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)
1	Panchsheel Textile Manufacturing & Trading Co. (P) Ltd.																																															
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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																																															
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	GRAND-TOTAL	13414652	60.18%	60.18%																																												
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																																												
	Total	13414652	60.18%	60.18%																																												

(*) 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 Polytext 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	Alfort Merchants (P) Ltd.	Promoter/Promoter Group	AADCK1963C	
4	Nightnagle Deacom (P) Ltd	Promoter/Promoter Group	AAICA9847L	
5	Enakshi Investments (P) Ltd.	Promoter/Promoter Group	AAACN5936R	
6	Gagan Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACE4008R	
7	Ruby Mercantile Co. (P) Ltd.	Promoter/Promoter Group	AAACG6654M	
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	AACP08407D	
17	Mrs. Manju Oswal	Promoter/Promoter Group	AACP08406C	
18	Mrs. Rakhi Oswal	Promoter/Promoter Group	AADPO0618F	
19	Mr. Abhinav Oswal	Promoter/Promoter Group	AFWPK6455Q	
20	Ms Aketa Oswal	Promoter/Promoter Group	AAJPO0573B	
21	Ashok Kumar & Sons (HUF)	Promoter/Promoter Group	AAXPO6768J	
22	Amrants Trust (through Trustee- Mrs. Rakhi Oswal)	Promoter/Promoter Group	AAGHA7592F	
			AAFTA9894F	

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

Ajay Ratra

From: Ajay Ratra <ajay.ratra@vpl.in>
Sent: Tuesday, April 2, 2019 10:25 AM
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_Reg 30_SAST.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 31.03.2019 in Vardhman Polytex Limited.

Kindly Acknowledge the Receipt.

Regards,

Adish Oswal

Date: 01.04.2019

The Listing Department, NATIONAL STOCK EXCHANGE OF INDIA LTD, "Exchange Plaza" Bandra - Kurla Complex, Bandra (East), Mumbai- 400 051 Scrip Code: VARDMNPOLY	The Listing Department, BSE LIMITED 25 th Floor, P.J. Towers, Dalal Street, Fort, Mumbai- 400 001 Scrip Code: 514175
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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)		
2		Name(s) of the stock exchange(s) where the shares of the TC are listed		
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		
b)		Name(s) of promoter(s), member of the promoter group and PAC with him.		
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, 2019, 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	Alfort 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	Alpey 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%
GRAND-TOTAL		13414652	60.18%	60.18%
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
Total		13414652	60.18%	60.18%

(*) 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	Whether the person belongs to Promoter/Promoter group	PAN of the person and PACs
		VARDHMAN POLYTEX LIMITED	
1	Panchsheel Textile Manufacturing & Trading 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	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

Ref. 31 FY 2019-20
Intitial disclosure
of encumbrance

Ajay Ratra

From: Ajay Ratra <ajay.ratra@vpl.in>
Sent: Friday, October 4, 2019 3:22 PM
To: 'takeover@nse.co.in'; 'corp.relations@bseindia.com'
Cc: 'secretarial@vpl.in'
Subject: Disclosure of reasons for encumbrances by promoter in terms of Regulation 31 read with 28 of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2015
Attachments: Encumbrance detail.pdf

Dear Sir/Madam

In compliance with the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated 07.08.2019, I, Adish Oswal, on behalf of promoter group of "Vardhman Polytex Limited", hereby disclose the detailed reasons for the encumbrance of promoter group holding in the above named entity in the format prescribed in the said circular (Annexure-II enclosed herewith).

Kindly acknowledge its receipt.

Regards,

Adish Oswal
On behalf of Promoters Group
of Vardhman Polytex Limited

Annexure - II

Format for disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular dated August 05, 2015)

Name of listed company	VARDHMAN POLYTEX LIMITED
Name of the recognised stock exchanges where the shares of the company are listed	1. NATIONAL STOCK EXCHANGE LIMITED 2. BSE LIMITED
Name of the promoter(s) / PACs whose shares have been encumbered	1. MR. ASHOK KUMAR OSWAL * 2. MR. ADISH OSWAL 3. MRS. MANJU OSWAL 4. ASHOK KUMAR AND SONS (HUF) 5. MRS. RAKHI OSWAL 6. MR. ABHINAV OSWAL 7. MS. AKETA OSWAL 8. BORAS INVESTMENT AND TRADING COMPANY PRIVATE LIMITED 9. CALGARY INVESTMENT AND TRADING COMPANY PRIVATE LIMITED 10. ENAKSHI INVESTMENTS PVT LTD 11. GAGAN MERCANTILE COMPANY PVT LTD 12. KENT INVESTMENTS PVT LTD 13. LIBERTY MERCANTILE COMPANY PVT LTD 14. PANCHSHEEL TEXTILE MFG AND TRADING COMPANY PVT LTD 15. RUBY MERCANTILE COMPANY PVT LTD 16. ADESH INVESTMENT AND TRADING COMPANY PVT LTD 17. ALLEPY INVESTMENT AND TRADING COMPANY PVT LTD 18. PIONEER MERCANTILE INDIA PVT LTD 19. NIGHTNAGLE DEALCOM PVT LTD 20. ALMA ASSETS CONSULTANCY PVT LTD
Total promoter shareholding in the listed company	No. of shares - 1,34,14,652 % of total share capital - 60.18%
Encumbered shares as a % of promoter shareholding	81.49 %
Whether encumbered share is 50% or more of promoter shareholding	YES
Whether encumbered share is 20% or more of total share capital	YES

* Mr. Ashok Kumar Oswal expired on 15.11.2018 and the transmission of the shares is yet to be effected.



Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 1 (Date of creation of encumbrance: _____)	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:			
NAME OF PROMOTERS	No. of shares encumbered	% of total share capital	Date of creation of encumbrance
1. MR.ASHOK KUMAR OSWAL	127748	0.57	08.03.2013
2. MR. ADISH OSWAL	11546	0.05	29.05.2013
	1300	0.01	16.04.2013
	31025	0.14	08.03.2013
	85640	0.38	10.03.2007
3. MRS. MANJU OSWAL	5000	0.02	08.03.2013
	47694	0.21	10.03.2007
4. ASHOK KUMAR & SONS (HUF)	110	0.00	08.03.2013
5. MRS. RAKHI OSWAL	17820	0.08	24.03.2007
6. MR. ABHINAV OSWAL	14307	0.06	07.03.2013
7. MS. AKETA OSWAL	5010	0.02	16.04.2013
8. BORAS INVESTMENT AND TRADING COMPANY PRIVATE LIMITED	32860	0.15	07.03.2013
9. CALGARY INVESTMENT AND TRADING COMPANY PRIVATE LIMITED	67300	0.30	07.03.2013

10. ENAKSHI INVESTMENTS PVT LTD	370250	1.66	07.03.2013	
11. GAGAN MERCANTILE COMPANY PVT LTD	163900	0.74	07.03.2013	
12. KENT INVESTMENTS PVT LTD	46950	0.21	07.03.2013	
13. LIBERTY MERCANTILE COMPANY PVT LTD	120550	0.54	07.03.2013	
14. PANCHSHEEL TEXTILE MFG AND TRADING COMPANY PVT LTD	24000 449600 3953317	0.11 2.02 17.74	29.10.2014 16.04.2013 07.03.2013	
15. RUBY MERCANTILE COMPANY PVT LTD	153000	0.69	07.03.2013	
16. ADESH INVESTMENT AND TRADING COMPANY PVT LTD	35100	0.16	08.06.2013	
17. ALLEPY INVESTMENT AND TRADING COMPANY PVT LTD	95500	0.43	16.04.2013	
18. PIONEER MERCANTILE INDIA PVT LTD	49350	0.22	07.03.2013	
19. NIGHTNAGLE DEALCOM PVT LTD	660000	2.96	08.10.2013	
20. ALMA ASSETS CONSULTANCY PVT LTD	1600000 787325 1975000	7.18 3.53 8.86	22.08.2013 08.10.2013 05.05.2014	
Total.	10931202	49.04%		

Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	CANARA BANK AS LEAD BANK OF CONSORTIUM OF 13 BANKS.		
	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.	YES (SCHEDULED COMMERCIAL BANK)		
	Names of all other entities in the agreement	LISTED COMPANY AND ITS GROUP COMPANIES (IF ANY) 1. NIL OTHER ENTITIES (IF ANY) 1. NIL		
	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		
Security Cover / Asset Cover	Value of shares on the date of event (pledge) / agreement (A)	Rs. 62.07 CRORE		
	Amount involved (against which shares have been encumbered) (B) (outstanding as on date)	Rs. 392.89 CRORE		
	Ratio of A / B	0.15		

<p>End use of money</p>	<p>Borrowed amount to be utilized for what purpose - (a) Personal use by promoters and PACs (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. (a) Any other reason (please specify)</p>	<p>B) For the benefit of Listed Company</p> <p>Borrowed amount includes the Credit Facilities in the form of Working Capital, Term Loan, WCTL and FITL obtained from 13 banks of consortium lead by Canara Bank.</p> <p>The said borrowed amount has been used for Capex, Working Capital and Operations of the Company.</p>	
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For and on behalf of Promoter Group
of Vardhman Polytex Limited



Adish Oswal
Authorized Signatory

Date: 03.10.2019

Place: Ludhiana

FY 2020-21

Annual Disclosure of

Ajay Ratra

encumbrance

From: Ajay Ratra <ajay.ratra@vpl.in>
Sent: Thursday, April 1, 2021 3:45 PM
To: 'takeover@nse.co.in'; 'corp.relations@bseindia.com'
Cc: 'secretarial@vpl.in'
Subject: Notice/disclosure u/r 30(1), 30(2) and 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 - Vardhman Polytex Limited
Attachments: SAST_Reg30_March2021.pdf; SAST_Reg31(4)_March2021.pdf

Dear Sir/ Madam,

Please find enclosed herewith notice/disclosure under Regulation 30(1), 30(2) and 31(4) 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 in Vardhman Polytex Limited.

Kindly Acknowledge the Receipt.

Regards,

Adish Oswal

Date: 01-04-2021

The Listing Department, NATIONAL STOCK EXCHANGE OF INDIA LTD, "Exchange Plaza" Bandra - Kurla Complex, Bandra (East), Mumbai- 400 051 Scrip Code: VARDMNPOLY	The Listing Department, BSE LIMITED 25th Floor, P.J. Towers, Dalal Street, Fort, Mumbai- 400 001 Scrip Code: 514175
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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