

# AKHIL RETAIL PRIVATE LIMITED

Reg. Office: 13, Anita Society, Vishvakunj Char Rasta, Paldi, Ahmedabad - 380007, Gujarat  
CIN: U52100GJ2011PTC063828

25<sup>th</sup> April, 2023

To,  
The Manager  
BSE Limited  
P. J. Towers, Dalal Street  
Mumbai – 400 001

**Sub.: Submission of disclosure under regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir/ Madam,

With reference to the above mentioned subject please find enclosed herewith disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011 in respect of inter se transfer of 53625000 Equity Shares of Rhetan TMT Limited pursuant to the scheme of amalgamation of KCP Retail Private Limited, with the Company.

Kindly take the above information on your records.

Yours Faithfully.

**For and on behalf of Akhil Retail Private Limited**

*Harshul. K. Shah*

Harshul Kumarpal Shah  
Director  
DIN: 01955747



**Cc: Rhetan TMT Limited**  
**Compliance Officer**  
7<sup>th</sup> Floor, Ashoka Chambers,  
Opp. HCG Hospital,  
Mithakhali Six Roads,  
Mithakhali Ahmedabad - 380006

Encl: As above

**Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Name of the Target Company (TC)	Rhetan TMT Limited		
Name(s) of the acquirer/seller and Persons Acting in Concert (PAC) with the acquirer/seller	Akhil Retail Private Limited <u>Persons Acting in Concert (PAC)</u> 1. Harshul Kumarpal Shah 2. KCP Retail Private Limited 3. Mita Harshul Shah 4. Akhil Harshul Shah 5. Mrudula Kumarpal Shah		
Whether the acquirer/seller belongs to Promoter/Promoter group	No		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited		
Details of the acquisition/ disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
<b>Before the acquisition/disposal under consideration, holding of:</b>			
a) Shares carrying voting rights			
1. Akhil Retail Private Limited	0	0.00	0.00
2. Harshul Kumarpal Shah	6875000	0.86	0.86
3. KCP Retail Private Limited	53625000	6.73	6.73
4. Mita Harshul Shah	0	0.00	0.00
5. Akhil Harshul Shah	0	0.00	0.00
6. Mrudula Kumarpal Shah	0	0.00	0.00
b) Shares in the nature of encumbrance (pledge/lien/ non-disposal undertaking/ others)	NA	NA	NA
c) Voting rights (VR) otherwise than by shares	NA	NA	NA
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)	NA	NA	NA
<b>e) Total (a+b+c+d)</b>	<b>60500000</b>	<b>7.59</b>	<b>7.59</b>



<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/sold <b>Akhil Retail Private Limited</b> <b>KCP Retail Private Limited</b>	53625000 (53625000)	6.73 (6.73)	6.73 (6.73)
b) VRs acquired/sold otherwise than by shares	NA	NA	NA
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold	NA	NA	NA
d) Shares encumbered / invoked/released by the acquirer	NA	NA	NA
e) Total (a+b+c+/-d)	0	0.00	0.00
<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights			
1. Akhil Retail Private Limited	53625000	6.73	6.73
2. Harshul Kumarpal Shah	6875000	0.86	0.86
3. KCP Retail Private Limited	0	0.00	0.00
4. Mita Harshul Shah	0	0.00	0.00
5. Akhil Harshul Shah	0	0.00	0.00
6. Mrudula Kumarpal Shah	0	0.00	0.00
b) Shares encumbered with the acquirer	NA	NA	NA
c) VRs otherwise than by shares	NA	NA	NA
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	NA	NA	NA
e) Total (a+b+c+d)	<b>60500000</b>	<b>7.59</b>	<b>7.59</b>
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter-se transfer (Off-Market)		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	24/04/2023		
Equity share capital / total voting capital of the TC before the said acquisition/sale	Rs. 79,68,75,000/- divided into Rs. 796875000 equity shares of face value of Re. 1/- each		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	Rs. 79,68,75,000/- divided into Rs. 796875000 equity shares of face value of Re. 1/- each		
Total diluted share/voting capital of the TC after the said acquisition/sale	Rs. 79,68,75,000/- divided into Rs. 796875000 equity shares of face value of Re. 1/- each		



For and on behalf of Acquirer/Seller(s) and their PACs

Harshul. K. Shah



**Harshul Kumarpal Shah**

**Place: Ahmedabad**

**Date: 25/04/2023**

**Note:**

(\* ) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(\*\*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.