

O3 DEVELOPERS PVT. LTD

Formerly known as "INFINIUM NATURAL RESOURCES INVESTMENTS PRIVATE LIMITED"

October 2, 2021

To,
Department of Corporate Services,
Bombay Stock Exchange Limited
P.J. Tower,
Dalal Street, Fort,
Mumbai-400 001

Dear Sir/Madam,

Sub: Revised Disclosure under Regulation 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Ref: Your office email dated September 24, 2021 titled Discrepancy in disclosure under Regulation 31 of SEBI (SAST) Regulations 2011. Gujarat Natural Resources Ltd 513536

With reference to the above mentioned subject please note the following:

Discrepancies:

1. Reason for encumbrance not given (Reason for Creation of Pledge or Release or Invoke of shares not given)

Reason: The format of disclosure in Annexure -1 under Regulation 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 stated "Reasons for encumbrance". As the disclosure pertained to release of pledge, we understood that it was not applicable and hence not mentioned.

2. Name of the entity in whose favor shares are encumbered not given

Reason: Again the format of disclosure in Annexure -1 under Regulation 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 stated "Name of the entity in whose favor shares encumbered". As the disclosure pertained to release of pledge we had not mentioned the same as it was not applicable.

As required, we have made necessary disclosures in the following fields of the revised disclosure:

1. Reasons for encumbrance and
2. Name of the entity in whose favor shares encumbered.

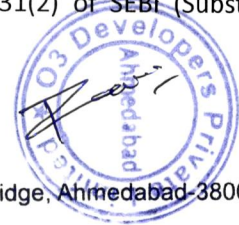
Please find enclosed herewith revised disclosure by the Promoter(s) to the stock exchanges and to the Target Company for release of pledge of shares in terms of Regulation 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

O3 DEVELOPERS PVT. LTD

Registered Office: 909, Shitiratna complex, off C.G. Road, Nr. Panchwati Cross Road, Ellisbridge, Ahmedabad-380007, Gujarat, INDIA

Phone: 079-26440364 | **FAX:** 079-26440359

CIN: U11201GJ2008PTC053424



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Please take the same on your records.

Thanking You.

Yours Faithfully,

**For Infinium Natural Resources Investments Private Limited
(Now known as O3 Developers Private Limited)**



Name: Pradipkumar N. Vegada

Director

DIN: 08397269



Encl. : Revised disclosure

Place : Ahmedabad

Date : 02/10/2021

Cc: Gujarat Natural Resources Limited
3rd Floor, A Wing, Gopal Palace,
Nehru Nagar, Satellite Road,
Ahmedabad-380 015

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For Infinium Natural Resources Investments Private Limited
(Now known as O3 Developers Private Limited)

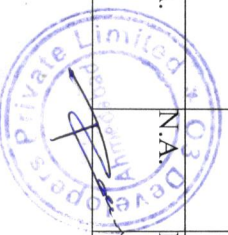
ANNEXURE – 1(Revised)

Format for disclosure by the Promoter(s) to the stock exchanges and to the Target Company for encumbrance of shares / invocation of encumbrance/ release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company(TC)	Gujarat Natural Resources Limited	
Names of the stock exchanges where the shares of the target company are listed	BSE Limited	
Date of reporting	02/10/2021(Revised to earlier disclosure dated 03-07-2021)	
Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked	Infinium Natural Resources Investments Private Limited (Now known as O3 Developers Private Limited)	

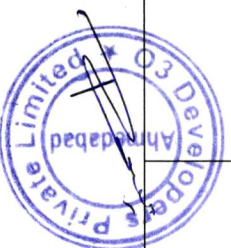
Details of the creation of encumbrance: 30/06/2021 (Date of release of pledge)

Name of the promoter (s) or PACs with him*	Promoter holding in the target company (1)	Promoter holding already encumbered (2)	Details of events pertaining to encumbrance (3)			Post event holding of encumbered shares {creation [(2)+(3)] / release [(2)-(3)] / invocation [(1)-(3)]}							
	Number	% of total share capital	Number	% of total share capital	Type of event (creation / release / invocation)	Date of creation/ release/ invocation of encumbrance	Type of encumbrance (pledge / lien/ non disposa l underta king/ others)	Reasons for encumbranc e **	Number	% of share capital	Name of the entity in whose favor shares encumbered ***	Number	% of total share capital
Payal Shalin Shah	565000	1.00	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.



Ashok Chinubhai Shah	125100	0.22	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Malav Ajitbhai Mehta	48000	0.09	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Leena Ashok Shah	9700	0.02	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Jayshreebhai Ajitbhai Mehta	8421	0.01	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Shalin Ashok Shah	400	0.00	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Infinium Natural Resources Investments Private Limited (Now Known As O3 Developers Private Limited)	6800000	12.09	6800000	12.09	Release of Pledge	30/06/2021	Release of Pledge	Repayment of the debt	6800000	12.09	Tradebulls Capital Limited (Entity which has released pledge)	0	0	
Tiw Systems Private Limited	1555000	2.76	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	
Infinium Motors Private Limited	1000000	1.78	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	
Advanced Energy Resources & Management Private Limited	530000	0.94	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	

Name: Pradipkumar N. Vegada
Director
DIN: 08397269



Shree Ghantakarna Rolling Mills Pvt Ltd (Now known as Rhetan Rolling Mills Private Limited)	505000	0.90	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Tanya Estates Private Limited (Now known as Ashoka Mercast Limited)	350000	0.62	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Ashnisha Alloys Private Limited (Now known as Ashnisha Industries Limited)	298900	0.53	Nil	Nil	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.

Place : Ahmedabad
Date : 02/10/2021



*The names of all the promoters, their shareholding in the target company and their pledged shareholding as on the reporting date should appear in the table irrespective of whether they are reporting on the date of event or not.

** For example, for the purpose of collateral for loans taken by the company, personal borrowing, third party pledge, etc.

***This would include name of both the lender and the trustee who may hold shares directly or on behalf of the lender.