

U. P. HOTELS LIMITED

Registered Office & Operations Head Quarters
1101, Surya Kiran Building, 19, K. G. Marg, New Delhi - 110 001
Phone No.: 011-23722596-8, 011-41510325-6 * PAN: AADCS1783J
Email : clarkssuryakiran@yahoo.co.in * Web: www.hotelclarks.com
CIN: L55101DL1961PLC017307 * GSTIN: 07AADCS1783J3Z2



CLARKS
GROUP OF
HOTELS

Date: 17.06.2022

To,

BSE Limited,
Listing Department,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400001.

Scrip ID / Code: 509960

Subject: **Reporting under Regulation 10(7) w.r.t. Inter-se transfer between Promoter/Promoter Group under Regulation 10(1)(i)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir/Ma'am,

We would like to inform you that we have received a report from Mr. Vivek Kumar, Acquirer, under regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 w.r.t. inter se transfer of shares between Mr. Vivek Kumar (acquirer) and Mr. Udit Kumar, Seller & Mr. Arnav Kumar, Seller, all being immediate relatives and part of the Promoter Group of U. P. Hotels Limited (hereinafter referred to as "the Company") with regard to transfer of 12894 and 12894 equity shares, respectively, of the Company between them.

In this connection, necessary disclosures/intimation/report under Regulation 10(5), 10(6) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations and Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations for the above said acquisition in prescribed format, were already filed with BSE Limited.

The report alongwith payment of application fee of Rs.1,50,000/- to 'Securities and Exchange Board of India' was already made vide **NEFT Dr-BKID0000122-SECURITIES AND EXCHANGE BOARD OF INDIA-NEW BEL RD, B-N168222002950550 Dated 17.06.2022.**

Kindly take the same on record and acknowledge the receipt of the same.

Thanking you,

For U. P. Hotels Limited

Prakash Chandra Prusty
Company Secretary

Encl.: as above

Vivek Kumar
M: 9845010171

Flat No. 342, The Embassy,
Apartment no. 15, Aliaskar Road,
Bangaluru - 560052
Email: vivek@indus-tex.com

Date: 17.06.2022

To,

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

Subject: Reporting under Regulation 10(7) w.r.t. Inter-se transfer between Promoter/Promoter Group under Regulation 10(1)(i)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Dear Sir/Ma'am,

Please find enclosed a report under regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of an acquisition made in reliance upon exemption provided for in regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 w.r.t. inter se transfer of shares between me, the acquirer and Mr. Udit Kumar, Seller & Mr. Arnav Kumar, Seller, all being immediate relatives and part of the Promoter Group of U. P. Hotels Limited (hereinafter referred to as "the Company") with regard to transfer of 12894 and 12894 equity shares, respectively, of the Company between us.

In this connection, necessary disclosures/intimation/report under Regulation 10(5), 10(6) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations and Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations for the above said acquisition in prescribed format, were already filed with BSE Limited.

The payment towards application fee of Rs.1,50,000/- to 'Securities and Exchange Board of India' has been made vide NEFT Dr-BKID0000122-SECURITIES AND EXCHANGE BOARD OF INDIA-NEW BEL RD, B-N168222002950550 Dated 17.06.2022.

Kindly take the same on record and acknowledge the receipt of the same.

Thanking you,



(Vivek Kumar)
Acquirer

Encl.: as above

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.}	Name: Mr. Vivek Kumar Address: Flat No. 342, The Embassy, Apartment no. 15, Aliaskar Road, Bangaluru - 560052 Contact No: 9845010171 Email Id: vivek@indus-tex.com
	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)	NA
	d. Name, address, Tel no. and e-mail of the sender, if sender is not the acquirer	NA
2	Compliance of Regulation 10(7)	
	a. Date of report	17.06.2022
	b. Whether report has been submitted to SEBI Within 21 working days from the date of the acquisition	No There is a delay of one working day
	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	31.03.2022
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	No There is a delay of seventeen working days (The delay was inadvertently and unintentional)
	b. Date of Report	On 17.06.2022 for 12894 Equity Shares Transferred from Mr. Udit Kumar; and On 17.06.2022 for 12894 Equity Shares Transferred from Mr. Arnav Kumar.

5	Details of the Target Company (TC)					
	a.	Name & address of TC	U. P. Hotels Limited 1101, Surya Kiran Building, 19, K. G. Marg, New Delhi - 110 001			
	b.	Name of the Stock Exchange(s) where the shares of the TC are listed	BSE Limited			
6	Details of the acquisition					
	a.	Date of acquisition	May 19, 2022			
	b.	Acquisition price per share (in Rs.)	NA (Inter-se transfer of shares among the promoter & promoter group by way of gift without any consideration.)			
	c.	Regulation which would have been 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)			
	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)(*)	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
		Name of the acquirer(s)/PAC(**)	64566	1.20%	90354	1.68%
		MR. VIVEK KUMAR				
	e.	Shareholding of seller/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
		Name of the seller(s)(**)	12894	0.24%	Nil	0.00%
		MR. UDIT KUMAR				
		Name of the seller(s)(**)	12894	0.24%	Nil	0.00%
		Mr. ARNAV KUMAR				
7	Information specific to the exemption category to which the instant acquisition belongs- Regulation 10(1)(a)(i)					
	a.	Provide the names of the seller(s)	Mr. Udit Kumar (12894 equity shares); and Mr. Arnav Kumar (12894 equity shares)			
	b.	Specify the relationship between the acquirer(s) and the seller(s).	Acquirer and sellers are a part of the promoter and promoter group of TC. Acquirer and Seller are immediate relatives.			
	c.	Confirm whether the acquirer(s) and the seller(s) are 'immediate relatives' as defined in the Regulation 2(1).	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
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 regulation8.	Not Applicable as the shares are transferred by way of gift without any consideration.
f.	Confirm whether the acquisition price per share is not higher by more than twenty-five percent to the price as calculated in (d) or (e) Above as applicable.	Not Applicable as the shares are transferred by way of gift without any consideration.
g.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	31.03.2022
h.	Whether the acquirers as well as sellers have complied with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). If yes, specify applicable regulation(s) as well as date on which the requisite disclosures were made along with the copies of the same.	Yes The acquirers as well as sellers have complied/ will comply with the provisions of Chapter V of the Takeover Regulations, 2011. Disclosure filed under Regulation 10(5) and 10(6) with stock exchange on March 31, 2022 and June 17, 2022 as well the disclosure filed under regulation 29(2) filed on June 17, 2022 (There is a delay of seventeen working days for Compliance under Regulation 10(6). The delay was inadvertently and unintentional. We request for condonation of delay)
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 confirmed that all the conditions specified under regulation 10(1)(a)(i) with respect to exemptions has been duly complied with.

I/We hereby declare that the information provided in the instant report is true and nothing has been concealed therefrom.

(Vivek Kumar)
Signature of the Acquirer

Date: 17.06.2022

Place: Bangalore

Vivek Kumar
M: 9845010171

Flat No. 342, The Embassy,
Apartment no. 15, Aliaskar Road,
Bangaluru - 560052
Email: vivek@indus-tex.com

Date: 17.06.2022

To,

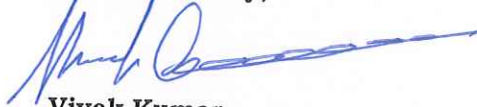
Securities and Exchange Board of India
Plot No.C4-A, 'G' Block
Bandra-Kurla Complex, Bandra (East),
Mumbai - 400051, Maharashtra.

Subject: Exemption under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares Takeover) Regulations, 2011

Dear Sir/Madam,

I, Vivek Kumar, hereby confirm that all the conditions specified under regulation 10(1)(a)(i) with respect to exemptions have been duly complied with.

Yours faithfully,



Vivek Kumar
Acquirer

Place: Bangaluru

U.P. HOTELS LTD.

Registered Office & Operations Head Quarters

1101, Surya Kiran Building, 19, Kasturba Gandhi Marg, New Delhi-110001

Phone No. : 011-23722596-8, 011-41510325-6 • Fax : 011-23312990

Email : clarsuryakiran@yahoo.co.in • Web : www.hotelclarks.com

CIN No. : L55101DL1961PLC 017307 • PAN No. : AADCS1783J



**CLARKS
GROUP OF
HOTELS**

To,

BSE Limited,
The Secretary,
Listing Department,
The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400001.

Scrip ID / Code: 509960

Subject: Intimation under Regulation 10 (5) for Intention for an Inter-se transfer between Promoter/Promoter Group in accordance with Regulation 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Dear Sir/Ma'am,

In compliance with Regulation 10(5) of SEBI (SAST) Regulations, 2011, we would like to inform you that we have received intimation from the Acquirer, being one of the Promoter of U.P. Hotels Limited (hereinafter referred to as "the Company") intended to receive collectively 25,788 (Twenty Five Thousand Seven Hundred and Eighty Eight only) Equity Shares of the Company by way of gift for NIL consideration from Mr. Udit Kumar and Arnav Kumar, being immediate relative and part of the Promoter Group of the Company.

This being an "inter se" transfer of shares amongst Promoter/Promoter Group by way of gift and without any consideration, the same falls within the exemptions under Regulation 10(l)(a) provided under SEBI (SAST) Regulations, 2011.

The Aggregate holding of Promoter and Promoter Group before and after the above inter se transaction remains the same (details individually enclosed).

In this connection necessary disclosure under Regulation 10(5) for the above said acquisition in prescribed format, as submitted by the Transferor is enclosed herewith for your kind information and records.

Kindly take the same on record and acknowledge the receipt of the same.

Thanking you,

Yours Faithfully,

For U.P. Hotels Limited

Prakash Prusty

Company Secretary

Date: 31st March, 2022

Place: New Delhi

Vivek Kumar
M: 9845010171

Flat No. 342, The Embassy,
Apartment no. 15, Aliaskar Road,
Bangaluru - 560052
Email: vivek@indus-tex.com

To,

BSE Limited
The Secretary,
Listing Department,
The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400001

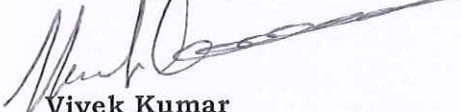
Dear Sir / Ma'am,

Subject: Intimation under Regulation 10 (5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Please find attached Intimation under Regulation 10 (5) in respect of proposed acquisition of shares of U. P. Hotels Limited under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 by way of gift.

This is for your information and Records.

Thanking You,



Vivek Kumar
Acquirer

Date: 31.03.2022
Place: Bangaluru

CC:
Company Secretary & Compliance officer

U. P. Hotels Limited
1101, Surya Kirann,
19, K. G. Marg,
New Delhi -1110001

Vivek Kumar
M: 9845010171

Flat No. 342, The Embassy,
Apartment no. 15, Aliaskar Road,
Bangaluru - 560052
Email: vivek@indus-tex.com

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)	U. P. Hotels Limited (“UPHL”)	
2.	Name of the acquirer(s)	Vivek Kumar	
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, Promoter	
4.	Details of proposed acquisition		
	a.	Name of the person(s) from whom shares are to be acquired	Udit Kumar Arnav Kumar
	b.	Proposed date of acquisition	Anytime after 4 working days from the date of this intimation, i.e. on or after, Wednesday, April 6, 2022.
	c.	Number of shares to be acquired from each person mentioned in 4(a) above	Mr. Udit Kumar proposes to transfer 12,894 Equity Shares and Mr. Arnav Kumar proposes to transfer 12,894 Equity Shares by way of gift to Mr. Vivek Kumar.
	d.	Total shares to be acquired as % of share capital of TC	0.48%
	e.	Price at which shares are proposed to be acquired	Gift
	f.	Rationale, if any, for the proposed transfer	Inter-se transfer of shares between immediate relatives by way of gift.
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	10(1)(a)(i) of SEBI (SAST) Regulation 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.	NA, as shares are gifted by transferor to transferee	
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	NA	
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.	NA	
9.	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)	I hereby declare that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)	



Vivek Kumar
M: 9845010171

Flat No. 342, The Embassy,
Apartment no. 15, Aliaskar Road,
Bangaluru - 560052
Email: vivek@indus-tex.com

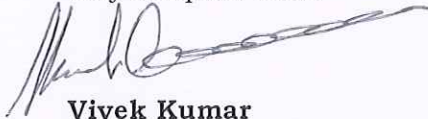
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	I hereby declare that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.			
11.	Shareholding details	Before the proposed transaction		After the proposed transaction	
		No. of shares /voting rights	% w.r.t total diluted share capital of TC	No. of shares /voting rights	% w.r.t total diluted share capital of TC
a	Acquirer(s) and PACs (other than sellers)(*) (Refer Annexure 1)	47,47,172	87.91%	47,72,960	88.39%
b	Seller (s) (Refer Annexure 2)	25,788	0.48%	NIL	NIL

Note:

- (*) 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.

I hereby also declare that all the provisions of Chapter V of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 shall be complied with.

I hereby also declare that all the conditions as specified under Regulation 10(1) (a) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 has been duly complied with.

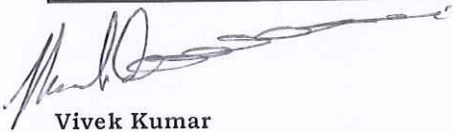


Vivek Kumar
Acquirer

Date: 31.03.2022
Place: Bangaluru

U. P. HOTELS LIMITED
Acquirer(s) and PACs (other than sellers)

S.No.	Name	No. of Shares currently held	%age of Total Capital (₹ 540 lacs)
1	Shri Sushil Kumar	77,924	1.44
2	Sushil Kumar & Sons (Kumar Sushil)	98,280	1.82
3	Smt. Meera Kumar	98,248	1.82
4	Shri Upendra Kumar	2,32,796	4.31
5	Smt. Anuradha Gupta	25,092	0.46
6	Shri Chaitanya Kumar	16,200	0.30
7	Shri Birendra Kumar	40,470	0.75
8	Birendra Kumar & Sons	66,600	1.23
9	Smt. Rani Upsam	44,280	0.82
10	Shri Apurv Kumar	35,126	0.65
11	Smt. Rajeshwari Kumar	22,200	0.41
12	Shri Anoop Kumar	86,372	1.60
13	Shri Aryavir Kumar	800	0.01
14	Smt. Renuka Kumar	800	0.01
15	Shri Arvind Kumar	29,341	0.54
16	Smt. Vibha Agrawal	83,016	1.54
17	Shri Vivek Kumar	64,566	1.20
18	Smt. Shipra Kumar	36,000	0.67
19	Shri Arjun Kumar	47,780	0.88
20	Shri Anant Kumar	20,692	0.38
21	Shri Manish Kumar	1,26,420	2.34
22	Shri Binay Kumar	42,860	0.79
23	Binay Kumar & Family	16,625	0.31
24	Binay Kumar & Sons	11,652	0.22
25	Smt. Veena Binay Kumar	1,42,200	2.63
26	Shri Alok Kumar	69,300	1.28
27	Smt. Uma Kumar	28,800	0.53
28	Shri Aditya Kumar	53,692	0.99
29	Shri Rupak Gupta	7,79,126	14.43
30	P D Gupta & Sons	3,600	0.07
31	Shri Rupak Gupta	39,398	0.73
32	Shri Rakesh M Gupta	90,520	1.68
33	Smt. Sudhira Gupta	46,280	0.86
34	Shri Ravi M Gupta	1,00,080	1.85
35	Smt. Nandini Gupta	36,720	0.68
36	The Indian Textiles Co. Pvt. Ltd.	13,13,676	24.33
37	Hotel Clarks Varanasi Ltd.	890	0.02
38	Hotel Clarks Varanasi Ltd.	1,78,650	3.31
39	Banaras House Pvt. Ltd.	5,40,000	10.00
40	Bonita India Ltd.	100	0.00
	Total	47,47,172	87.91



Vivek Kumar

Acquirer

Date: 31.03.2022

Place: Bangaluru

U. P. HOTELS LIMITED**Details of Sellers**

S.No.	Name	No. of Shares currently held	%age of Total Capital (₹ 540 lacs)
1	Shri Udit Kumar	12,894	0.24
2	Shri Arnav Kumar	12,894	0.24
	Total	25,788	0.48

**Vivek Kumar****Acquirer**

Date: 31.03.2022

Place: Bangaluru

Vivek Kumar
M: 9845010171

Flat No. 342, The Embassy,
Apartment no. 15, Aliaskar Road,
Bangaluru - 560052
Email: vivek@indus-tex.com

To,

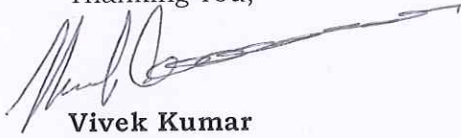
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400001

Dear Sir,

I, Undersigned hereby undertake and confirm as under with respect to proposed inter se transfer of shares in terms of Regulation 10(l)(a)(i) of SEBI (SAST) Regulations, 2011 and subsequent amendments thereto that:

1. The transferor and transferee have complied with the applicable provisions of Chapter II of SEBI (SAST) Regulations, 1997 and Chapter V of SEBI (SAST) Regulations, 2011.
2. All the applicable conditions as mentioned in Regulation 10(l)(a) of SEBI (SAST) Regulations, 2011 with respect to exemption have been duly complied with.

Thanking You,



Vivek Kumar
Acquirer

Date: 31.03.2022
Place: Bangaluru

U. P. HOTELS LIMITED

Registered Office & Operations Head Quarters
1101, Surya Kiran Building, 19, K. G. Marg, New Delhi - 110 001
Phone No.: 011-23722596-8, 011-41510325-6 * PAN: AADCS1783J
Email : clarkssuryakiran@yahoo.co.in * Web: www.hotelclarks.com
CIN: L55101DL1961PLC017307 * GSTIN: 07AADCS1783J3Z2



CLARKS
GROUP OF
HOTELS

Date: 17.06.2022

To,

BSE Limited,
The Secretary,
Listing Department,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400001.

Scrip ID / Code: 509960

Subject: Intimation - Inter-se transfer between Promoter/Promoter Group under Regulation 10(5), 10(6), 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations.

Dear Sir/Ma'am,

We would like to inform you that we have received disclosures/intimation/report from Mr. Vivek Kumar, Acquirer, and Mr. Arnav Kumar, Seller, both being immediate relatives and part of the Promoter Group of U. P. Hotels Limited (hereinafter referred to as "the Company") with regard to transfer of 12894 equity shares of the Company between them.

This being an "inter se" transfer of shares amongst Promoter/Promoter Group by way of gift and without any consideration, the same falls within the exemptions under Regulation 10(l)(a) provided under SEBI (SAST) Regulations, 2011.

In this connection necessary disclosures/intimation/report under Regulation 10(6) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations and Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations for the above said acquisition in prescribed format, as submitted by the acquirer and seller are enclosed herewith for your kind information and records.

Kindly take the same on record and acknowledge the receipt of the same.

Thanking you,

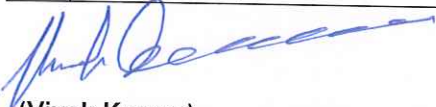
For U. P. Hotels Limited

Prakash Chandra Prusty
Company Secretary

Encl.: as above

Disclosures under Regulation 10(6) – Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	U. P. Hotels Limited			
2.	Name of the acquirer(s)	Mr. Vivek Kumar			
3.	Name of the stock exchange where shares of the TC are listed	BSE Limited			
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Mr. Arnav Kumar transferred 12894 equity shares of U.P. Hotels Limited by way of gift to Mr. Vivek Kumar.			
5.	Relevant regulation under which the acquirer is exempted from making open offer	Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011			
6.	Whether disclosure of 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 the regulations. - date of filing with the stock exchange.	Disclosure under Regulation 10(5) was made within the time specified. Date of filing: 31.03.2022			
7.	Details of acquisition	Disclosures required to be made under regulation 10(5)	Whether the disclosures under regulation 10(5) are actually made		
	a. Name of the transferor / seller	Mr. Arnav Kumar	Yes		
	b. Date of acquisition	19.05.2022	Yes		
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	12894 equity shares	Yes		
	d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	12894 equity shares (0.24% - Proposed) 12894 equity shares (0.24% - Actual)	Yes		
	e. Price at which shares are proposed to be acquired / actually acquired	Gift	Yes		
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. Each Acquirer / Transferee(*)	77460	1.44%	90354	1.68%
	b. Each Seller / Transferor	12894	0.24%	Nil	0.00%


(Vivek Kumar)
Signature of the acquirer
Place: Bangalore
Date: 17.06.2022

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

Name of the Target Company (TC)	U. P. HOTELS LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	MR. VIVEK KUMAR		
Whether the acquirer belongs to Promoter/Promoter group	YES		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE LIMITED		
Details of the acquisition as follows	Number	% w.r.t. total Share / voting Capital wherever applicable(*)	% w.r.t. total Diluted Share / voting capital of the TC (**)
Before the acquisition under consideration, holding of :			
a) Shares carrying voting rights	77460	1.44	1.44
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)			
c) Voting rights (VR) otherwise than by shares			
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)			
e) Total (a+b+c+d)	77460	1.44	1.44
Details of acquisition			
a) Shares carrying voting rights acquired	12894	0.24	0.24
b) VRs acquired /sold otherwise than by shares			
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			
d) Shares encumbered / invoked/released by the acquirer			
e) Total (a+b+c+/-d)	12894	0.24	0.24
After the acquisition, holding of:			
a) Shares carrying voting rights	90354	1.68	1.68
b) Shares encumbered with the acquirer			
c) VRs otherwise than by shares			

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			
e) Total (a+b+c+d)	90354	1.68	1.68
Mode of acquisition (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter-se transfer		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	19.05.2022		
Equity share capital / total voting capital of the TC before the said acquisition / sale	Rs.5,40,000,00/-		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	Rs.5,40,000,00/-		
Total diluted share/voting capital of the TC after the said acquisition	Rs.5,40,000,00/-		

(*) 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.

(Vivek Kumar)
Signature of the acquirer

Place: Bangalore
Date: 17.06.2022

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

Name of the Target Company (TC)	U. P. HOTELS LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	MR. ARNAV KUMAR (SELLER)		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE LIMITED		
Details of the disposal as follows	Number	% w.r.t. total Share / voting Capital wherever applicable(*)	% w.r.t. total Diluted Share / voting capital of the TC (**)
Before the Disposal under consideration, holding of :			
a) Shares carrying voting rights	12894	0.24	0.24
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
c) Voting rights (VR) otherwise than by shares	-	-	-
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	-	-	-
e) Total (a+b+c+d)	12894	0.24	0.24
Details of sale			
a) Shares carrying voting rights sold	12894	0.24	0.24
b) VRs acquired /sold otherwise than by shares	-	-	-
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	-	-	-
d) Shares encumbered / invoked/released by the acquirer	-	-	-
e) Total (a+b+c+/-d)	12894	0.24	0.24
After the sale, holding of:			
a) Shares carrying voting rights	Nil	0.00	0.00
b) Shares encumbered with the acquirer	-	-	-
c) VRs otherwise than by shares	-	-	-
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 e) Total (a+b+c+d)	Nil	0.00	0.00
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter-se transfer		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	19.05.2022		
Equity share capital / total voting capital of the TC before the said acquisition / sale	Rs.5,40,000,00/-		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	Rs.5,40,000,00/-		
Total diluted share/voting capital of the TC after the said acquisition	Rs.5,40,000,00/-		

(*) 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.

(Arnav Kumar)
Signature of the seller

Place: Bangalore
Date: 17.06.2022

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(2) read with Regulation 6(2) - Confidential Disclosure]

Name of the Company: U. P. Hotels Limited
ISIN of the Company: INE726E01014

Details of change in holding of securities of Promoter, member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2)

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
		Type of securities (For eg. - shares, warrants, Convertible Debentures, Rights entitlements, etc.)	No. and % of share holding	Type of securities (For eg. - shares, warrants, Convertible Debentures, Rights entitlements, etc.)	No.	Value	Transaction type (Purchase /Sale/Pledge/Revocation/Others- please specify)	Type of securities (For eg. - shares, warrants, Convertible Debentures, Rights entitlements, etc.)	No. and % of share holding	From	To			
Vivek Kumar ADRPK0578R Flat No. 342, The Embassy, Apartment no. 15, Aliaskar Road, Bangaluru - 560052	Promoter Group	Shares	77460 1.44%	Shares	12894	Nil - Gift	Purchase (Inter-se Transfer)	Shares	90354 1.68%	19.05.2022		17.06.2022	Inter-se Transfer	BSE Limited

(Vivek Kumar)
Acquirer

Place: Bangalore
Date: 17.06.2022

FORM C
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(2) read with Regulation 6(2) - Continual Disclosure]

Name of the Company: U. P. Hotels Limited
ISIN of the Company: INE726E01014

Details of change in holding of securities of Promoter, member of the Promoter Group, Designated Person or Director of a listed company and Immediate relatives of such persons and other such persons as mentioned in Regulation 6(2)

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Arnav Kumar AVZPK1122H	Promoter Group	Shares	12894 0.24%	Shares	12894	Nil - Gift	Sale (Inter-se Transfer)	Shares	Nil 0.00%	19.05.2022		17.06.2022	Inter-se Transfer	BSE Limited

(Arnav Kumar)
Seller

Place: Bangalore

Date: 17.06.2022



U. P. HOTELS LIMITED

Registered Office & Operations Head Quarters
1101, Surya Kiran Building, 19, K. G. Marg, New Delhi - 110 001
Phone No.: 011-23722596-8, 011-41510325-6 * PAN: AADCS1783J
Email : clarkssuryakiran@yahoo.co.in * Web: www.hotelclarks.com
CIN: L55101DL1961PLC017307 * GSTIN: 07AADCS1783J3Z2



CLARKS
GROUP OF
HOTELS

Date: 17.06.2022

To,

BSE Limited,
The Secretary,
Listing Department,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400001.

Scrip ID / Code: 509960

Subject: Intimation - Inter-se transfer between Promoter/Promoter Group under Regulation 10(5), 10(6), 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations.

Dear Sir/Ma'am,

We would like to inform you that we have received disclosures/intimation/report from Mr. Vivek Kumar, Acquirer, and Mr. Arnav Kumar, Seller, both being immediate relatives and part of the Promoter Group of U. P. Hotels Limited (hereinafter referred to as "the Company") with regard to transfer of 12894 equity shares of the Company between them.

This being an "inter se" transfer of shares amongst Promoter/Promoter Group by way of gift and without any consideration, the same falls within the exemptions under Regulation 10(l)(a) provided under SEBI (SAST) Regulations, 2011.

In this connection necessary disclosures/intimation/report under Regulation 10(6) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations and Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations for the above said acquisition in prescribed format, as submitted by the acquirer and seller are enclosed herewith for your kind information and records.

Kindly take the same on record and acknowledge the receipt of the same.

Thanking you,

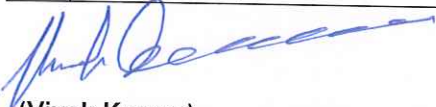
For U. P. Hotels Limited

Prakash Chandra Prusty
Company Secretary

Encl.: as above

Disclosures under Regulation 10(6) – Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	U. P. Hotels Limited			
2.	Name of the acquirer(s)	Mr. Vivek Kumar			
3.	Name of the stock exchange where shares of the TC are listed	BSE Limited			
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Mr. Arnav Kumar transferred 12894 equity shares of U.P. Hotels Limited by way of gift to Mr. Vivek Kumar.			
5.	Relevant regulation under which the acquirer is exempted from making open offer	Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011			
6.	Whether disclosure of 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 the regulations. - date of filing with the stock exchange.	Disclosure under Regulation 10(5) was made within the time specified. Date of filing: 31.03.2022			
7.	Details of acquisition	Disclosures required to be made under regulation 10(5)	Whether the disclosures under regulation 10(5) are actually made		
	a. Name of the transferor / seller	Mr. Arnav Kumar	Yes		
	b. Date of acquisition	19.05.2022	Yes		
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	12894 equity shares	Yes		
	d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	12894 equity shares (0.24% - Proposed) 12894 equity shares (0.24% - Actual)	Yes		
	e. Price at which shares are proposed to be acquired / actually acquired	Gift	Yes		
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. Each Acquirer / Transferee(*)	77460	1.44%	90354	1.68%
	b. Each Seller / Transferor	12894	0.24%	Nil	0.00%


(Vivek Kumar)
Signature of the acquirer
Place: Bangalore
Date: 17.06.2022

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

Name of the Target Company (TC)	U. P. HOTELS LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	MR. VIVEK KUMAR		
Whether the acquirer belongs to Promoter/Promoter group	YES		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE LIMITED		
Details of the acquisition as follows	Number	% w.r.t. total Share / voting Capital wherever applicable(*)	% w.r.t. total Diluted Share / voting capital of the TC (**)
Before the acquisition under consideration, holding of :			
a) Shares carrying voting rights	77460	1.44	1.44
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)			
c) Voting rights (VR) otherwise than by shares			
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)			
e) Total (a+b+c+d)	77460	1.44	1.44
Details of acquisition			
a) Shares carrying voting rights acquired	12894	0.24	0.24
b) VRs acquired /sold otherwise than by shares			
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			
d) Shares encumbered / invoked/released by the acquirer			
e) Total (a+b+c+/-d)	12894	0.24	0.24
After the acquisition, holding of:			
a) Shares carrying voting rights	90354	1.68	1.68
b) Shares encumbered with the acquirer			
c) VRs otherwise than by shares			

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			
e) Total (a+b+c+d)	90354	1.68	1.68
Mode of acquisition (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter-se transfer		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	19.05.2022		
Equity share capital / total voting capital of the TC before the said acquisition / sale	Rs.5,40,000,00/-		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	Rs.5,40,000,00/-		
Total diluted share/voting capital of the TC after the said acquisition	Rs.5,40,000,00/-		

(*) 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.

(Vivek Kumar)
Signature of the acquirer

Place: Bangalore
Date: 17.06.2022

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

Name of the Target Company (TC)	U. P. HOTELS LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	MR. ARNAV KUMAR (SELLER)		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE LIMITED		
Details of the disposal as follows	Number	% w.r.t. total Share / voting Capital wherever applicable(*)	% w.r.t. total Diluted Share / voting capital of the TC (**)
Before the Disposal under consideration, holding of :			
a) Shares carrying voting rights	12894	0.24	0.24
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
c) Voting rights (VR) otherwise than by shares	-	-	-
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	-	-	-
e) Total (a+b+c+d)	12894	0.24	0.24
Details of sale			
a) Shares carrying voting rights sold	12894	0.24	0.24
b) VRs acquired /sold otherwise than by shares	-	-	-
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	-	-	-
d) Shares encumbered / invoked/released by the acquirer	-	-	-
e) Total (a+b+c+/-d)	12894	0.24	0.24
After the sale, holding of:			
a) Shares carrying voting rights	Nil	0.00	0.00
b) Shares encumbered with the acquirer	-	-	-
c) VRs otherwise than by shares	-	-	-
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 e) Total (a+b+c+d)	Nil	0.00	0.00
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter-se transfer		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	19.05.2022		
Equity share capital / total voting capital of the TC before the said acquisition / sale	Rs.5,40,000,00/-		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	Rs.5,40,000,00/-		
Total diluted share/voting capital of the TC after the said acquisition	Rs.5,40,000,00/-		

(*) 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.

(Arnav Kumar)
Signature of the seller

Place: Bangalore
Date: 17.06.2022

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(2) read with Regulation 6(2) - Confidual Disclosure]

Name of the Company: U. P. Hotels Limited
ISIN of the Company: INE726E01014

Details of change in holding of securities of Promoter, member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2)

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
		Type of securities (For eg. - shares, warrants, Convertible Debentures, Rights entitlements, etc.)	No. and % of share holding	Type of securities (For eg. - shares, warrants, Convertible Debentures, Rights entitlements, etc.)	No.	Value	Transaction type (Purchase /Sale/Pledge/Revocation/Others- please specify)	Type of securities (For eg. - shares, warrants, Convertible Debentures, Rights entitlements, etc.)	No. and % of share holding	From	To			
Vivek Kumar ADRPK0578R Flat No. 342, The Embassy, Apartment no. 15, Aliaskar Road, Bangaluru - 560052	Promoter Group	Shares	77460 1.44%	Shares	12894	Nil - Gift	Purchase (Inter-se Transfer)	Shares	90354 1.68%	19.05.2022		17.06.2022	Inter-se Transfer	BSE Limited

(Vivek Kumar)
Acquirer

Place: Bangalore
Date: 17.06.2022

FORM C
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(2) read with Regulation 6(2) - Continual Disclosure]

Name of the Company: U. P. Hotels Limited
ISIN of the Company: INE726E01014

Details of change in holding of securities of Promoter, member of the Promoter Group, Designated Person or Director of a listed company and Immediate relatives of such persons and other such persons as mentioned in Regulation 6(2)

1	2	3	4	5	6	7	8	9	10	11		12	13	14	15
										From	To				
Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/ member of the promoter group/ designated person/ Directors/ immediate relative to / others etc.)	Securities held prior to disposal	No. and % of share holding	Type of securities (For eg. - shares, warrants, Convertible Debentures, Rights entitlements, etc.)	No.	Value	Transaction type (Purchase /Sale/pledge/Revocation/Others- please specify)	Type of securities (For eg. - shares, warrants, Convertible Debentures, Rights entitlements, etc.)	No. and % of share holding	From	To	Date of allotment of shares/ disposal of shares, specify	Date of intimation to company	Mode of acquisition/ disposal (on market/ public/ rights/ preferential offer/ off market/ inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed
Arnav Kumar AVZPK1122H Flat No. 342, The Embassy, Apartment no. 15, Allaskar Road, Bangaluru - 560052	Promoter Group	Shares	12894 0.24%	Debtenture s, Rights entitlement nts, etc.)	12894	Nil - Gift	Sale (Inter-se Transfer)	Shares	Nil 0.00%	19.05.2022		17.06.2022		Inter-se Transfer	BSE Limited

(Arnav Kumar)
Seller

Place: Bangalore

Date: 17.06.2022