

**RUPA AGARWAL**  
**Tower 2B, Flat – 14E, Active Acres**  
**54/10, D C Dey Road, Tangra, Kolkata – 700015**

---

Date: 10.09.2024

To,  
The Manager  
Department of Corporate Services  
**Bombay Stock Exchange Limited**  
1st Floor, New Trading Wing,  
Rotunda Building, Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai-400 001


To,  
The Company Secretary  
**Dhatre Udyog Limited**  
(Formerly known as Narayani Steels Limited)  
ERGO Tower, Plot No. - A1 -4,  
Block - EP & GP Unit No. - 1406,  
14th Floor, Sector - V, Bidhan Nagar  
Saltlake, West Bengal, India, 700091

**Sub: Disclosure in terms of Regulation 29(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011– Through Open Market**

I hereby submit the disclosure as required under Regulation 29(2) of the SEBI (SAST) Regulations, 2011, regarding sale of 5,80,808 (0.53%) equity shares of Dhatre Udyog Limited through Open Market.

In this connection, necessary disclosure under Regulation 29(2) for the above said acquisition in the prescribed format is enclosed herewith for your kind information and records.  
Kindly take the same on record.

Thanking You,  
Yours Faithfully,

  
**RUPA AGARWAL**  
**Promoter Group**

**Encl. as above**

**RUPA AGARWAL**  
**Tower 2B, Flat – 14E, Active Acres**  
**54/10, D C Dey Road, Tangra, Kolkata – 700015**

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

Name of the Target Company (TC)	Dhatre Udyog Limited (Formerly known as Narayani Steels Limited)		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Rupa Agarwal		
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 / disposal as follows	<b>Number</b>	<b>% w.r.t. total share/voting capital wherever applicable (*)</b>	<b>% w.r.t. total diluted share/voting capital of the TC (**)</b>
<b>Before the acquisition/disposal under consideration, holding of :</b>			
a) Shares carrying voting rights	19,49,051	1.78%	1.78%
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 TC (specify holding in each category)			
<b>e) Total (a+b+c+d)</b>	19,49,051	1.78%	1.78%
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired/sold	5,80,808	0.53%	0.53%

**RUPA AGARWAL**  
**Tower 2B, Flat – 14E, Active Acres**  
**54/10, D C Dey Road, Tangra, Kolkata – 700015**

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			
<b>e) Total (a+b+c+d)</b>	5,80,808	0.53%	0.53%
<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights	13,68,243	1.25%	1.25%
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			
<b>e) Total (a+b+c+d)</b>	13,68,243	1.25%	1.25%
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Through Open Market		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	05-09-2024		
Equity share capital / total voting capital of the TC before the said acquisition / sale	Rs. 10,89,54,500 comprising of 1,08,95,4500 equity shares of Rs. 1/- each		

**RUPA AGARWAL**  
**Tower 2B, Flat – 14E, Active Acres**  
**54/10, D C Dey Road, Tangra, Kolkata – 700015**

---

Equity share capital/ total voting capital of the TC after the said acquisition / sale	Rs. 10,89,54,500 comprising of 1,08,95,4500 equity shares of Rs. 1/- each
Total diluted share/voting capital of the TC after the said acquisition/ sale	Rs. 10,89,54,500 comprising of 1,08,95,4500 equity shares of Rs. 1/- each

(\*) 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.

**Signature of the Seller**

Place: Kolkata

Date: September 10, 2024

*Rupa Agarwal*

**Rupa Agarwal**  
**Promoter Group**



**RUPA AGARWAL**  
**Tower 2B, Flat – 14E, Active Acres**  
**54/10, D C Dey Road, Tangra, Kolkata – 700015**

---

**Statement showing change in shareholding of each person belong to the promoters' group forming part of the Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 dated September 10, 2024**

Name of Promoter	Before acquisition		Acquisition / (Disposal)	After acquisition	
	No. of shares	%	No. of shares	No. of shares	%
Aditya Aggarwal	-	-	-	-	-
Anup Poddar	40,00,000	3.67%	-	40,00,000	3.67%
Aspire Capital Pvt Ltd	1,00,00,000	9.18%	-	1,00,00,000	9.18%
OIPL India Pvt Ltd	1,00,00,000	9.18%	-	1,00,00,000	9.18%
PKG Financiers Pvt Ltd	29,99,840	2.75%	-	29,99,840	2.75%
Prachi Mittal	5,62,030	0.52%	-	5,62,030	0.52%
Priti Poddar	18,00,000	1.65%	-	18,00,000	1.65%
Rachana Agarwal	1,00,00,000	9.18%	-	1,00,00,000	9.18%
Rishikunj Vincom Pvt Ltd	25,12,210	2.31%	-	25,12,210	2.31%
Rupa Agarwal	19,49,051	1.78%	(5,80,808)	13,68,243	1.25%
Subhash Kumar Agarwala	39,93,040	3.66%	-	39,93,040	3.66%
Sumit Kumar Agarwal	1,00,00,000	9.18%	-	1,00,00,000	9.18%
Sumit Kumar Agarwal (HUF)	1,56,25,480	14.34%	-	1,56,25,480	14.34%
<b>Total</b>	<b>7,34,41,651</b>	<b>67.40%</b>		<b>7,28,60,843</b>	<b>66.87%</b>

**Signature of the Seller**

Place: Kolkata

Date: September 10, 2024

*Rupa Agarwal*

**Rupa Agarwal**

**Promoter Group**