

20 September 2021

The General Manager <b>BSE Ltd.</b> Phiroze Jeejeebhoy Towers Dalal Street Mumbai 400 001 Company Code: 526521	The Asst Vice President <b>The National Stock Exchange of India Ltd.</b> Exchange Plaza, 5 <sup>th</sup> Floor Plot No. C/1, G Block Bandra Kurla Complex Bandra (East), Mumbai – 400051 Company Symbol: SANGHIIND
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Dear Sir,

**Sub : Disclosure of Inter-se Transfer of Shares between the Promoters / Promoter Group in accordance with Regulation 10(5) of SEBI (SAST) Regulations, 2011.**

Pursuant to the Regulation 30 read with Schedule III of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 read with Regulation 3 of SEBI (Prohibition of Insider Regulations) Regulations, 2015, we would like to inform you that the Company has received an information from the following persons that they are in process of inter-se transfer of shares amongst themselves through an off market transaction in terms of partition of Ravi Sanghi HUF.

The details of the same are as under:

<b>Date of Proposed Transaction</b>	<b>Name of the Transferor / Donor</b>	<b>Name of the Transferee / Donee</b>	<b>No. of shares proposed to be transferred by way of partition of Ravi Sanghi HUF</b>	<b>% of holding</b>
On or after 25 September 2021	Ravi Sanghi HUF	Mr. Aditya Sanghi	39,33,000	1.5669%
On or after 25 September 2021	Ravi Sanghi HUF	Mr. Alok Sanghi	39,33,000	1.5669%

This being an inter-se transfer of shares amongst Promoter Group, the same falls within the exemption under Regulation 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. This is in the nature of transfer of shares through an off Market transaction amongst Promoter Group.



**Sanghi Industries Limited**

CIN No. : L18209TG1985PLC005581

Registered Office : P.O. Sanghinagar, Hayatnagar Mandal, R R District, Telangana - 501511.

Tel. : 08415 - 242240 E-mail : companysecretary@sanghiment.com

Website : www.sanghiment.com

The Aggregate holding of Promoter and Promoter group before and after the above inter-se transaction remains the same.

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

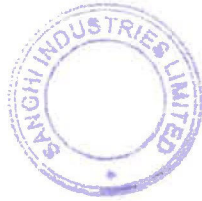
Thanking you,

Yours faithfully,

**For, Sanghi Industries Limited**



Anil Agrawal  
**Company Secretary**



Encl : As above

20 September 2021

<b>BSE Ltd.</b> Phiroze Jeejeebhoy Towers Dalal Street Mumbai 400 001 Company Code: 526521	<b>The National Stock Exchange of India Ltd.</b> Exchange Plaza, 5 <sup>th</sup> Floor Plot No. C/1, G Block Bandra Kurla Complex Bandra (East), Mumbai – 400051 Company Symbol:SANGHIIND	<b>The Company Secretary</b> Sanghi Industries Limited Sanghinagar P.O. Hayatnagar Mandal, R R District Telangana – 501511
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Dear Sir,

**Sub : Prior Intimation under Regulation 10(5) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for proposed acquisition of shares**

In compliance with the provisions of Regulation 10(5) of the SEBI (SAST) Regulations, 2011, the undersigned being part of the Promoter and Promoter Group of the Company, hereby furnish the PRIOR INTIMATION in the specified format under regulation 10(5) in respect of proposed inter-se transfer of 78,66,000 (3.13%) shares of Sanghi Industries Limited being the Target Company ("TC") in the following manner:

- i. Inter-se Transfer (by way of Partition of HUF) of 39,33,000 (1.5669%) shares from Ravi Sanghi HUF to Mr. Aditya Sanghi;
- ii. Inter-se Transfer (by way of Partition of HUF) of 39,33,000 (1.5669%) shares from Ravi Sanghi HUF to Mr. Alok Sanghi;

The shares are proposed to be acquired by way of "Partition of Ravi Sanghi HUF" pursuant to exemption provided in Regulation 10(1)(a)(ii) of SEBI (SAST) Regulations, 2011 and there will be no change in the Total Shareholding of the Promoters Group after such *inter-se transfer* of shares of TC.

Thanking you,  
Yours faithfully,

**ADITYA  
SANGHI**

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**Aditya Sanghi**  
Acquirer

**ALOK  
SANGHI**

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**Alok Sanghi**  
Acquirer

Encl : As above

**Disclosure 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)	Sanghi Industries Limited
2.	Name of the acquirer(s)	Mr. Aditya Sanghi Mr. Alok Sanghi
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	The Acquirers are immediate relatives of the Promoter i.e. Mr. Ravi Sanghi and are part of Promoter Group of the TC
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Ravi Sanghi HUF
	b. Proposed date of acquisition	On or after 25 September 2021
	c. Number of shares to be acquired from each person mentioned in 4(a) above	78,66,000 shares held by Ravi Sanghi HUF in the TC will be divided among the following family members:  Mr. Aditya Sanghi – 39,33,000 shares Mr. Alok Sanghi – 39,33,000 shares
	d. Total shares to be acquired as % of sharecapital of TC	Acquirers will acquire 3.13% of the shares held by Ravi Sanghi HUF in equal ratio, pursuant to partition of Ravi Sanghi HUF:  Mr. Aditya Sanghi – 1.5669% Mr. Alok Sanghi – 1.5669%
	e. Price at which shares are proposed to be acquired	Nil. Shares are proposed to be transferred by way of Partition of HUF. Therefore, no consideration is involved.
	f. Rationale, if any, for the proposed transfer	The proposed acquisition is only a private transfer family arrangement, for smooth succession planning of the family and to streamline the Family's assets and businesses.
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Regulation 10(1)(a)(ii) 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.	Not applicable since the shares are proposed to be transferred by way of Partition of HUF. Therefore, no consideration is involved.
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not applicable since the shares are proposed to be transferred by way of Partition of HUF. Therefore, no consideration is involved.
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.	Not applicable since the shares are proposed to be transferred by way of Partition of HUF. Therefore, no consideration is involved.

9.	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)	Enclosed as Annexure - A			
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	Enclosed as Annexure - A			
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	Acquirer(s) and PACs (other than sellers)(*) i. Mr. Aditya Sanghi ii. Mr. Alok Sanghi	49,59,500 49,59,500	1.98% 1.98%	88,92,500 88,92,500	3.54% 3.54%
	<b>Total: Acquirer(s) and PACs (other than sellers)</b>	<b>99,19,000</b>	<b>3.95%</b>	<b>1,77,85,000</b>	<b>7.08%</b>
b	Seller (s) – Ravi Sanghi HUF	78,66,000	3.13%	-	-
	<b>Total: Seller(s)</b>	<b>78,66,000</b>	<b>3.13%</b>	<b>-</b>	<b>-</b>

**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.

ADITYA  
SANGHI

**Aditya Sanghi**  
**Acquirer**  
Date: 20 September 2021

ALOK  
SANGHI

**Alok Sanghi**  
**Acquirer**  
Date: 20 September 2021

## Annexure A

### DECLARATION BY ACQUIRERS

This is with respect to the proposed acquisition of shares by way of partition of Ravi Sanghi HUF, inter-se amongst the immediate relatives, within the Promoters and Promoter Group of the Company i.e. Sanghi Industries Limited in the following manner:

- i. Inter-se Transfer (by way of Partition of HUF) of 39,33,000 (1.5669%) shares from Ravi Sanghi HUF to Mr. Aditya Sanghi;
- ii. Inter-se Transfer (by way of Partition of HUF) of 39,33,000 (1.5669%) shares from Ravi Sanghi HUF to Mr. Alok Sanghi;

In this regard, the undersigned being the proposed transferees (acquirers) pursuant to the proposed "Partition of HUF", hereby declare that:

- a. 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)
- b. all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.

ADITYA  
SANGHI

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**Aditya Sanghi**  
**Acquirer**  
Date: 20 September 2021

ALOK  
SANGHI

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**Alok Sanghi**  
**Acquirer**  
Date: 20 September 2021