

# WALCHAND KAMDHENU COMMERCIALS PVT. LTD.

Neela House, 2<sup>nd</sup> Floor, M. L. Dahanukar Marg, Mumbai - 400 026.

Tel No. : 40287102 / 40287112 • Email id : gsagrawal@walchand.com • CIN . U51100MH1994PTC076384

---

Date : October 12, 2017

BSE Ltd.,  
Corporate Relations Department  
1st floor, New Trading Ring,  
Rotunda Bldg P.J. Tower,  
Mumbai 400 001  
Fax:: 22723121/2039/2037

Dear Sir,

Kind Attn : Mr. Rakesh Parekh, Special Assistant - Listing Compliance

**Sub: Clarification on Discrepancies in Disclosure under Regulation 31 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

**Ref.: Your mail dated October 11, 2017.**

This refers to your email dated October 11, 2017, addressed to Compliance Officer / Company Secretary of the Target Company i.e. Walchandnagar Industries Limited, regarding Discrepancies in the Disclosure under Regulation 31 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

In continuation to our earlier submission dated September 25, 2017, we hereby enclose revised Disclosure duly filled in the details in the columns, "Type of encumbrance" and "Reasons for encumbrance" as per Regulation 31(1) & 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for your information and records.

Thanking you,

Yours faithfully,  
For Walchand Kamdhenu Commercials Pvt. Ltd.



G. S. Agrawal  
Authorised Signatory

Encl : As above


DISCLOSURE BY 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) & 31(2) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011

Name of the Target Company (TC)	Walchandnagar Industries Limited
Names of the Stock Exchanges where the shares of the Target Company are listed	BSE Ltd., National Stock Exchange of India Ltd.
Date of Reporting	25.09.2017 (Revised Reporting)

Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked  
Walchand Kamdhenu Commercials Pvt. Ltd.

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))		
	No. of shares	% of total share capital	No. of shares	% of total share capital	Type of event (creation/release/invocation)	Date of creation/release/invocation of encumbrance	Type of encumbrance (pledge/lien/n on disposal undertaking/others)	Reasons for encumbrance	No. of shares	% of total share capital	Name of the entity in whose favor shares encumbered	No. of shares	% of total share capital
	Walchand Kamdhenu Commercials Pvt. Ltd.	9869673	25.92	9869673	25.92	Release	21.09.2017	Pledge	Repayment of Loan taken by Company	9869673	25.92	Vistra ITCL (India) Limited (Formerly known as IL&FS Trust Company Limited) [In Capacity as Security Trustee]	0
Walchand Great Achievers Pvt. Ltd.	5260160	13.82	0	0.00									
Walchand Chiranika Trading Pvt. Ltd.	342090	0.9	342090	0.9									
Chakor L. Doshi	49250	0.13	49250	0.13									
Olsson Holdings INC	2000000	5.25	2000000	5.25									
Rodin Holdings INC	3000000	7.88	3000000	7.88									
Chakor L. Doshi HUF	6680	0.02	6680	0.02									
Chirag C. Doshi	14000	0.04	14000	0.04									
Champa C. Doshi	10350	0.03	10350	0.03									
Smt. Lalitabai Lalchand Charity Trust	379210	1	0	0									
Walchand Charitable Trust	7200	0.02	0	0									

For Walchand Kamdhenu Commercials Pvt. Ltd.

  
G. S. Agrawal  
Authorised Signatory

Place : Mumbai  
Date : September 25, 2017 (Revised Reporting)