POLYCHEM LIMITED



REGD. OFFICE: 7, JAMSHEDJI TATA ROAD, CHURCHGATE RECLAMATION, MUMBAI-400 020.

TELEPHONE: 91 22 2282 0048 FAX : 91 22 2285 0606 URL :http://www.polychemltd.com EMAIL:polychemltd@kilachand.com CIN :L24100MH1955PLC009663

HO:CS&CO:039/2017

Date: 23rd February, 2017

To, Bombay Stock Exchange Ltd. Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001

Dear Sirs,

<u>Sub : Report under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers)</u>
<u>Regulations, 2011 - SCRIP CODE : 506605</u>

This is to inform that the Company has received letter from Masuma Tradecorp Private Limited and Rasayani Traders Private Limited, promoters of the Company regarding Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of shares and Takeovers Regulations, 2011). The letter dated 23rd February, 2017 is pertaining to Inter-se transfer among promoters of Polychem Limited is enclosed herewith for your ready reference.

You are requested to kindly take this on record.

Yours faithfully,
For **POLYCHEM LIMITED**

(Deepali V Chauhan)

Company Secretary & Compliance Officer

MASUMA TRADECORP PRIVATE LIMITED

(FORMERLY KNOWN AS MASUMA INVESTMENTS PRIVATE LIMITED)

Regd. Office: "Parag" Flat No. 602, 6th Floor, 27, Peddar Road, Mumbai - 400 026.

CIN : U65920MH1983PTC031611

DATE 23rd February, 2017

To, Bombay Stock Exchange Ltd. Pharoses Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001

Dear Sirs,

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

Kindly find enclosed herewith the report as required under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, pertaining to interse transfer among promoters of shares of Polychem Limited (Scrip code: 506605)

You are requested to kindly take this on record.

Yours faithfully,

For Masuma Tradecorp Pvt.Ltd.

Parthiv T.Kilachand

(DIN 00005516)

Director

CC: Polychem Ltd

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

1,	Name of the Target Company (TC)	Polychem Lim	ited		
		r siyenem Emmod			
2.	Name(s) of the acquirer and Person Acting in Concert (PAC) with the acquirer	Masuma Tradecorp Pvt.Ltd.			
3.	Whether the acquirer belong to Promoter/Promoters group.	Yes. Masuma Tradecorp Pvt.Ltd.is one of the Promoter Of Polychem Ltd.			
4.	Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE LIMITED			
5.	Details of acquisition/disposal as follows	Number	% w.r.t total share/voting capital wherever applicable	% w.r.t total diluted share /voting capital of TC (*)	
	Before the acquisition/disposal under				
	consideration, holding of Acquirer:				
	a. Shares carrying voting rights b. Shares in the nature of encumbrances (Pledge / lien non-disposed undertaking / others	9,997 NIL	2.47% NIL	2.47% NIL	
	 c. Voting rights (VR) otherwise then by shares d. Warrants / convertible securities / any other instrument that entitles the acquirer to 	NIL	NIL	NIL	
	receive shares carrying voting rights in the TC (specially holding in each category)	NIL	NIL	NIL	
	e. Total (a+b+c+d)	9,997	2.47%	2.47%	
	Details of acquisition / sale				
	a. Shares carrying voting rights acquired / sold b. VRs acquired / sold otherwise than by shares	49,990 NIL	12.38% NIL	12.38% NIL	
	 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 	NIL	NIL	NIL	
	d. Shares encumbered / invoked / released by the acquirer	NIL	NIL	NIL	
	e. Total (a+b+c+d)	49,990	12.38%	12.38%	

	After the acquisition/sale, holding of Acquirer			
	a. Shares carrying voting rights	59,987	14.85%	14.85%
	b. VRs otherwise than by shares	NIL	NIL	NIL
	c. Warrants / convertible securities / any other instrument that entitles the acquirer to receive the TC (specially holding in each category) after acquisition.	NIL	NIL	NIL
	 d. Shares encumbered / invoked / released by the acquirer. 	NIL	NIL	NIL
	e. Total (a+b+c+d)	59,987	14.85%	14.85%
6.	Mode of acquisition / sale (e.g. open market / off market / public issue / right issue / preferential allotment / inter – se transfer etc).	Inter se transfer Off Market		
7.	Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	20/02/2017		
8.	Equity share capital / total voting capital of the TC before the said acquisition / sale	404,045 Equity Shares of Rs.10/- each		
9.	Equity share capital / total voting capital of the / TC after the said acquisition / sale	404,045 Equity Shares of Rs.10/- each		
10.	Total diluted share / voting capital of the TC after the said acquisition / sale.	404,045 Equity	y Shares of Rs.1	10/- each

(*) Diluted share / voting capital means the total number of shares in the TC assuming full conversation of the understanding convertible securities / warrants into equity shares of the TC.

For Masuma Tradecorp Pvt.Ltd

Parthiv T.Kilachand (DIN 00005516)

Director

Place: Mumbai Date: 23/02/2017

RASAYANI TRADERS PRIVATE LIMITED

CIN: U51900MH1994PTC078663 Regd. Office: "Parag" Flat No. 602, 6th Floor, 27, Peddar Road, Mumbai - 400 026.

DATE 23rd February, 2017

To, Bombay Stock Exchange Ltd. Pharoses Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001

Dear Sirs,

<u>Sub : Report under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers)</u>
<u>Regulations, 2011</u>

Kindly find enclosed herewith the report as required under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, pertaining to interse transfer among promoters of shares of Polychem Limited (Scrip code: 506605)

You are requested to kindly take this on record.

Yours faithfully,

For Rasayani Traders Pvt.Ltd.

Nandish T.Kilachand (DIN 00005530)

Director

CC: Polychem Ltd

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

1.	Name of the Target Company (TC)	Polychem Limited		
2.	Name(s) of the acquirer and Person Acting in Concert (PAC) with the acquirer	Masuma Tradecorp Pvt.Ltd.		
3.	Whether the acquirer belong to Promoter/Promoters group.	Yes. Masuma Tradecorp Pvt.Ltd.is one of the Promoter Of Polychem Ltd.		
4.	Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE LIMITED		
5.	Details of acquisition/disposal as follows	Number	% w.r.t total share/voting capital wherever applicable	% w.r.t total diluted share /voting capital of TC (*)
	Before the acquisition/disposal under			
	 a. Shares carrying voting rights b. Shares in the nature of encumbrances (Pledge / lien non-disposed undertaking / others c. Voting rights (VR) otherwise then by shares d. Warrants / convertible securities / any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specially holding in each category) e. Total (a+b+c+d) 	49,990 NIL NIL NIL 49,990	12.38% NIL NIL NIL	12.38% NIL NIL NIL
	Details of acquisition / sale	161 mg - 164 mg		
	 a. Shares carrying voting rights acquired / sold b. VRs acquired / sold otherwise than by shares c. Warrants / convertible securities / any other 	49,990 NIL	12.38% NIL	12.38% NIL
	instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired / sold	NIL	NIL	NIL
	 d. Shares encumbered / invoked / released by the acquirer 	NIL	NIL	NIL
	e. Total (a+b+c+d)	49,990	12.38%	12.38%

	After the acquisition/sale, holding of Acquirer			
	a. Shares carrying voting rights	NIL	NIL	NIL
	b. VRs otherwise than by shares	NIL	NIL	NIL
	c. Warrants / convertible securities / any other instrument that entitles the acquirer to receive the TC (specially holding in each category) after acquisition.	NIL	NIL	NIL
	d. Shares encumbered / invoked / released by the acquirer.	NIL	NIL	NIL
	e. Total (a+b+c+d)	NIL	NIL	NIL
6.	Mode of acquisition / sale (e.g. open market / off market / public issue / right issue / preferential allotment / inter – se transfer etc).	Inter se transfer Off Market		
7.	Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	20/02/2017		
8.	Equity share capital / total voting capital of the TC before the said acquisition / sale	404,045 Equity Shares of Rs.10/- each		
9.	Equity share capital / total voting capital of the / TC after the said acquisition / sale	404,045 Equity Shares of Rs.10/- each		
10.	Total diluted share / voting capital of the TC after the said acquisition / sale.	404,045 Equity	Shares of Rs.1	0/- each

(*) Diluted share / voting capital means the total number of shares in the TC assuming full conversation of the understanding convertible securities / warrants into equity shares of the TC.

For Rasayani Traders Pvt,Ltd//

Nandish T.Kilachand (DIN 00005536)

Director

Place: Mumbai Date: 23/02/2017