

# BHAVESH TRUST

12A, Green Avenue Sector-D. Pocket-III  
Vasant Kunj,  
New Delhi – 110070

Date : 30th March, 2017

The Company Secretary,  
Jindal Poly Investment And Finance Company Limited  
Plot No. 12, Sector-12,  
Local Shopping, Complex, Vasant Kunj,  
New Delhi – 110070

Sub: **Disclosure under Regulation 29 (1) Substantial Acquisition of shares  
and takeover regulations, 2011**

Pursuant to Regulation 29(1) of SEBI (29 (1) Substantial Acquisition of shares and takeover regulations, 2011, We hereby inform you in prescribed format about receiving as a gift of 29,000 **Equity Shares** of Rs. 10 each in capacity as Person falling under promoter group.

We declare that the above dealing was not on the basis of any unpublished Price Sensitive Information relating to the Company.

For AND ON BEHALF OF BHAVESH TRUST

Place: New Delhi  
Encl: as above

  
Trustee

**Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A- Details of the Acquisition**

Name of the Target Company (TC)	JINDAL POLY INVESTMENT AND FINANCE COMPANY LIMITED. SCRIP CODE: BSE: 536773 NSE: JPOLYINVST		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	<b>Acquirer:</b> M/s Bhavesh Trust  <b>Persons Acting in Concert (PAC)</b> 1) Consolidated Photo and Finvest Limited 2) Soyuz Trading Company Limited 3) Rishi Trading Company Limited 4) Jindal Photo Investments Ltd 5) SSJ Trust 6) Shyam Sunder Jindal 7) Bhavesh Jindal (Transferor) 8) Aakriti Ankit Agarwal		
Whether the acquirer belongs to Promoter/Promoter group	Promoter group		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	i) National Stock Exchange of India Limited. (NSE) ii) BSE Limited.(BSE)		
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 acquirer along with PACs of:**

a) **Shares Carrying Voting Rights.**

<b>Acquirer Along with PAC</b>	<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>
SOYUZ TRADING COMPANY LIMITED	2962066	28.18	28.18
JINDAL PHOTO INVESTMENTS LTD.	2862575	27.23	27.23
RISHI TRADING COMPANY LTD	1630189	11.89	15.51
SSJ TRUST	185800	1.77	1.77
CONSOLIDATED PHOTO & FINVEST LTD.	61557	0.59	0.59
BHAVESH JINDAL (Transferor)	30000	0.29	0.29
AAKRITI ANKIT AGARWAL	112500	1.07	1.07
SHYAM SUNDER JINDAL	Nil		

For BHAVESH TRUST

  
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b) Shares in the nature of encumbrance (pledge / lien / non-disposal undertaking / other)	NIL	NA	NA
c) Voting rights (VR) otherwise than by equity shares	NIL	NA	NA
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)	NIL	NA	NA
e) Total (a+b+c+d)	<b>7844687</b>	74.63	
<b>Details of acquisition</b>			
a) Shares carrying voting rights acquired from Bhavesh Trust	<b>29000</b>	<b>0.27%</b>	
b) VRs acquired otherwise than by equity shares	NIL	N.A	
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying category) acquired	NIL	N.A	
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NIL	N.A	
e) Total (a+b+c+d)	<b>29000</b>	<b>0.27%</b>	
<b>After the acquisition, holding of acquirer along with PACs of:</b>			
a) Shares carrying voting rights			
<b>Acquirer Along with PAC</b>	<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>
SSJ TRUST	1,85,800	1.77	1.77
SOYUZ TRADING COMPANY LIMITED	29,62,066	28.18	28.18
JINDAL PHOTO INVESTMENTS LTD.	28,62,575	27.23	27.23
RISHI TRADING COMPANY LTD	16,30,189	15.51	15.51
CONSOLIDATED PHOTO & FINVEST LTD.	61,557	0.59	0.59
BHAVESH JINDAL (Transferor)	1,000	-	-
AAKRITI ANKIT AGARWAL	1,000	-	-
BHAVESH TRUST (Transferee)	29,000	0.27	-
AAKRITI TRUST	1,11,500	1.06	-
SHYAM SUNDER JINDAL	Nil	-	-

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b) VRs otherwise than by equity shares	NIL	N.A	N.A
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) after acquisition	NIL	N.A	N.A
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	NIL	N.A	N.A
e) Total (a+b+c+d)	<b>7844687</b>	<b>74.63</b>	<b>74.63</b>
Mode of acquisition (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer/encumbrance, etc.)	Off Market, transferred the Shares as a gift by Mr Bhavesh Jindal to Bhavesh Trust ( he is one of Trustee), by way of executing the Gift Deed.		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	Existing Equity Shares		
Date of acquisition of/ date of receipt of intimation of allotment of shares / VR/ warrants/convertible securities/any other instrument that entitles the acquirer to receive shares in the TC.	30 <sup>th</sup> March, 2017		
Equity share capital / total voting capital of the TC before the said acquisition	<b>10511929 Equity Shares of Rs. 10 each.</b>		
Equity share capital/ total voting capital of the TC after the said acquisition	<b>10511929 Equity Shares of Rs. 10 each.</b>		
Total diluted share/voting capital of the TC after the said acquisition	<b>10511929 Equity Shares of Rs. 10 each</b>		

**For BHAVESH TRUST**



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For and on behalf of Bhavesh Trust  
For BHAVESH TRUST

  
Signature of the acquirer / Authorized Signatory  
(Trustee) TRUSTEE

Place: New Delhi

Date: 30<sup>th</sup> March, 2017

**Note:**

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015.

(\*\*) 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.

(\*\*\*) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.