

**SHANTABEN VISHNUBHAI PATEL**

**11, Hindu Colony, Opp.Sardar Patel Stadium, Navrangpura, Ahmedabad-380 009 Gujarat**

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March 24, 2017

Dept. of Corporate Services  
**BSE Limited**  
P. J. Towers,  
Dalal Street,  
Mumbai – 400 001  
**Scrip Code: 532710**

Listing Department  
**National Stock Exchange of India Limited**  
Exchange Plaza, Bandra-Kurla Complex,  
Bandra (E),  
Mumbai - 400 051.  
**Scrip Name: SADBHAV**

**Subject: Disclosure under regulation 10(5) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended (“SEBI (SAST) Regulations”).**

Dear Sir/Madam,

Please find enclosed disclosure under regulation 10(5) of SEBI (SAST) Regulations.

Kindly acknowledge receipt of the same and update your records and oblige

Thanking you,

Yours Faithfully,

*S.V. Patel.*  
**Shantaben Vishnubhai Patel**

**Disclosures 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)	Sadbhav Engineering Limited
2.	Name of the acquirer(s)	Shantaben Vishnubhai Patel
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	Yes, the Acquirer is the promoter of the TC
4.	<b>Details of the proposed acquisition</b>	
	a. Name of the person(s) from whom shares are to be acquired	Sadbhav Finstock Private Limited
	b. Proposed date of acquisition	March 31, 2017
	c. Number of shares to be acquired from each person mentioned in 4(a) above	1,65,45,275
	d. Total shares to be acquired as % of share capital of TC	9.64%
	e. Price at which shares are proposed to be acquired	At the prevailing market price on the date of the transaction
	f. Rationale, if any, for the proposed transfer	Inter-se transfer
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Sub-clause (ii) of regulation 10(1)(a)
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.	Rs. 280.96 (Based on trades on NSE)
7.	If in-frequently traded, the price as determined in terms of clause (c) of sub-regulation (2) of regulation 8.	Not Applicable
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.	I hereby declare that the acquisition price would not be higher by more than 25% of the price computed in point 6 above.
9.	i. Declaration by the acquirer, that the transferor and transferee have complied (during 3 years prior to the date of the proposed acquisition) / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)  ii. The aforesaid disclosures made during previous 3 years prior to the date of proposed acquisition to be furnished.	i. I hereby declare that the transferor and transferee have complied (during 3 years prior to the date of the proposed acquisition) / will comply with applicable disclosure requirement in Chapter V of the Takeover Regulation, 2011 (Corresponding provision of the repealed Takeover Regulation 1997).  ii. 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.	I hereby declare that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.

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)				
		Shantaben Vishnubhai Patel	1,47,15,375	8.58	3,12,60,650	18.22
	b	Seller(s) - Sadbhav Finstock Private Limited	1,65,45,275	9.64	NIL	NIL

*S.V. Patel.*

**Shantaben Vishnubhai Patel**

**Place:** Ahmedabad

**Date:** March 24, 2017

Annexure: As above

# Annexure - A

## Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

To  
**The Compliance Officer**  
 Sadbhav Engineering Limited  
 "Sadbhav House",  
 Opp. Law Garden Police Chowki  
 Ellisbridge,  
 Ahmedabad - 380 006

To  
**Bombay Stock Exchange Limited**  
 Department of Corporate Services  
 P.J. Towers,  
 Dalal Street,  
 Mumbai - 400 001  
 Equity Scrip Code:532710

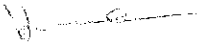
To  
**National Stock Exchange of India Limited**  
 Exchange Plaza, 5<sup>th</sup> floor  
 Plot No. C1/G Block  
 Bandra Kurla Complex  
 Bandra (E),  
 Mumbai - 400 051  
 Equity Scrip Name: SADBHAV

1.	Name of the Target Company (TC)	Sadbhav Engineering Ltd.
2.	Name(s) of the stock exchange(s) where the shares of the TC are listed	Bombay Stock Exchange Limited National Stock Exchange of India Limited
3.	Particulars of the shareholder(s):  a. Name of the person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.  OR b. Name(s) of Promoter(s), member of the promoter group and PAC with him.	Vishnubhai M. Patel Shantaben V. Patel  <b>Name of Promoter Group</b>  1. Girish N. Patel 2. Shashin V. Patel 3. Vasistha C. Patel 4. Vikramkumar R. Patel 5. Tosha A. Patel 6. Santokba Trust 7. Sadbhav Finstock Pvt. Ltd. 8. V.M. Patel(HUF) 9. Vipul H. Patel 10. Rekhaben Vishnubhai Patel 11. Bhavna Vikramkumar Patel 12. Truptiben Vishubhai Patel 13. Patel Alpa Dharmin 14. Rajshree Vishnubhai Patel

4	Particulars of the shareholding of person(s) mentioned at (3) above	No. of shares	% w.r.t. total share/voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
	As of March 31 <sup>st</sup> of the year, holding of:			
	<b>1) Vishnubhai M. Patel</b>	17829220	11.76	11.17
	a) Shares	-	-	-
	b) Voting Rights (otherwise than by shares)	-	-	-
	c) Warrants	5600000	3.69	3.51
	d) Convertible securities	-	-	-
	e) Any other instrument that would entitle the holder to receive shares in the TC.	-	-	-
	<b>2) Shantaben V. Patel</b>	14715375	9.70	9.21
	a) Shares	-	-	-
	<b>3) Shashin V. Patel</b>	5499720	3.63	3.44
	a) Shares	-	-	-
	<b>4) Girish N. Patel</b>	675500	0.45	0.42
	a) Shares	-	-	-
	<b>5) Vasistha C. Patel</b>	2002150	1.32	1.25
	a) Shares	-	-	-
	b) Voting Rights (otherwise than by shares)	-	-	-
	c) Warrants	1200000	0.79	0.75
	d) Convertible securities	-	-	-
	e) Any other instrument that would entitle the holder to receive shares in the TC.	-	-	-
	<b>6) Vikramkumar R. Patel</b>	3408750	2.25	2.13
	a) Shares	-	-	-
	b) Voting Rights (otherwise than by shares)	-	-	-
	c) Warrants	1200000	0.79	0.75
	d) Convertible securities	-	-	-
	e) Any other instrument that would entitle the holder to receive shares in the TC.	-	-	-
	<b>7) Tosha A. Patel</b>	1040000	0.69	0.65
	a) Shares	-	-	-
	<b>8) Santokba Trust</b>	3993840	2.63	2.50
	a) Shares	-	-	-
	<b>9) Sadbhav Finstock Pvt. Ltd.</b>	16545275	10.91	10.36
	a) Shares	-	-	-
	<b>10) V. M. Patel -HUF</b>	4581700	3.02	2.87
	a) Shares	-	-	-
	<b>11) Vipul H. Patel</b>	166850	0.11	0.10
	a) Shares	-	-	-

12) Rekhaben V. Patel a) Shares	675500	0.45	0.42
13) Bhavnaben V. Patel a) Shares	675500	0.45	0.42
14) Truptiben V. Patel a) Shares	675500	0.45	0.42
15) Alpa D. Patel a) Shares	675500	0.45	0.42
16) Rajshreeben V. Patel a) Shares	675500	0.45	0.42
<b>TOTAL</b>	<b>81835880</b>	<b>53.99</b>	<b>51.21</b>

(\*) 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.

  
**Vishnubhai M. Patel**  
Duly Authorised by,  
Promoters/Members of Promoter Group

Place: Ahmedabad  
Date: 05/06/2014

**VISHNUBHAI M. PATEL**

**11, Hindu Colony, Opp.Sardar Patel Stadium, Navrangpura, Ahmedabad-380 009 Gujarat**

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Date : 06/06/2015

To,  
The Dy. Gen. Manager,  
Corporate Relationship Dept.,  
**Bombay Stock Exchange Limited**  
PJ Tower, Dalal Street,  
Mumbai - 400 001  
Fax No.022-22722037-39  
Equity Scrip Code:532710

To,  
**National Stock Exchange of India Ltd.**  
Exchange Plaza,  
Plot no. C/1, G Block,  
Bandra-Kurla Complex, Bandra (E)  
Mumbai - 400 051  
Fax No.022-26598237-38  
Equity Scrip Name: SADBHAV

Sub. : Disclosures

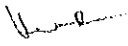
Dear Sir,

Pl find attached herewith the Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge the documents.

Thanking You,

Yours faithfully,

  
**Vishnubhai M. Patel**  
Duly Authorised by,  
Promoters/Members of Promoter Group  
DIN-00048287

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

To  
**The Compliance Officer**  
 Sadbhav Engineering Limited  
 "Sadbhav House",  
 Opp. Law Garden Police Chowki  
 Ellisbridge,  
 Ahmedabad - 380 006

To  
**BSE Limited**  
 Department of Corporate Services  
 P.J. Towers,  
 Dalal Street,  
 Mumbai - 400 001  
 Equity Scrip Code:532710

To  
**National Stock Exchange of India Limited**  
 Exchange Plaza, 5<sup>th</sup> floor  
 Plot No. C1/G Block  
 Bandra Kurla Complex  
 Bandra (E),  
 Mumbai - 400 051  
 Equity Scrip Name: SADBHAV

**Part-A- Details of Shareholding**

1.	Name of the Target Company (TC)	Sadbhav Engineering Ltd.
2.	Name(s) of the stock exchange(s) where the shares of the TC are listed	Bombay Stock Exchange Limited National Stock Exchange of India Limited
3.	Particulars of the shareholder(s):  a. Name of the person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.  OR b. Name(s) of Promoter(s), member of the promoter group and PAC with him.	Vishnubhai M. Patel Shantaben V. Patel  <b>Name of Promoter Group</b>  1. Girish N. Patel 2. Shashin V. Patel 3. Vasistha C. Patel 4. Vikramkumar R. Patel 5. Santokba Trust 6. Sadbhav Finstock Pvt. Ltd. 7. V.M. Patel(HUF) 8. Vipul H. Patel 9. Rekhaben Vishnubhai Patel 10. Bhavna Vikramkumar Patel 11. Truptiben Vishubhai Patel 12. Patel Alpa Dharmin 13. Rajshree Vishnubhai Patel



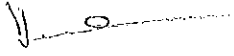
4	Particulars of the shareholding of person(s) mentioned at (3) above	No. of shares	% w.r.t. total share/voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
	As of March 31 <sup>st</sup> of the year, holding of:			
	<b>1) Vishnubhai M. Patel</b> a) Shares b) Voting Rights (otherwise than by shares) c) Warrants d) Convertible securities e) Any other instrument that would entitle the holder to receive shares in the TC.	23429220 - - - -	13.66 - - - -	13.66 - - - -
	<b>2) Shantaben V. Patel</b> a) Shares	14715375	8.58	8.58
	<b>3) Shashin V. Patel</b> a) Shares	5499720	3.21	3.21
	<b>4) Girish N. Patel</b> a) Shares	675500	0.39	0.39
	<b>5) Vasistha C. Patel</b> a) Shares b) Voting Rights (otherwise than by shares) c) Warrants d) Convertible securities e) Any other instrument that would entitle the holder to receive shares in the TC.	3202150 - - - -	1.87 - - - -	1.87 - - - -
	<b>6) Vikramkumar R. Patel</b> a) Shares b) Voting Rights (otherwise than by shares) c) Warrants d) Convertible securities e) Any other instrument that would entitle the holder to receive shares in the TC.	4608750 - - - -	2.69 - - - -	2.69 - - - -
	<b>7) Santokba Trust</b> a) Shares	3993840	2.33	2.33
	<b>8) Sadbhav Finstock Pvt. Ltd.</b> a) Shares	16545275	9.65	9.65
	<b>9) V. M. Patel -HUF</b> a) Shares	4581700	2.67	2.67
	<b>10) Vipul H. Patel</b> a) Shares	166850	0.10	0.10
	<b>11) Rekhaben V. Patel</b> a) Shares	675500	0.39	0.39

12) Bhavnaben V. Patel a) Shares	675500	0.39	0.39
13) Truptiben V. Patel a) Shares	675500	0.39	0.39
14) Alpa D. Patel a) Shares	675500	0.39	0.39
15) Rajshreeben V. Patel a) Shares	675500	0.39	0.39
<b>TOTAL</b>	<b>80795880</b>	<b>47.11</b>	<b>47.11</b>

**Part- B\*\***

**Name of the Target Company : Sadbhav Engineering Ltd.**

Name(s) of the person and Persons Acting in Concert(PAC) with the person	Whether the person belongs to Promoter/Promoter group	PAN of the person and PACs
Vishnubhai M. Patel	Promoter	AEHPP8757L
Shantaben V. Patel	Promoter	ABGPP7486A
Girish N. Patel	Promoter Group	ABEPP8969L
Shashin V. Patel	Promoter Group	AFRPP6274P
Vikram R. Patel	Promoter Group	ACHPP0255D
Vasistha C. Patel	Promoter Group	AATPP3517C
Vishnubhai M. Patel HUF	Promoter Group	AABHP8777J
Santokba Trust	Promoter Group	AACT52065B
Sadbhav Finstock Private Limited	Promoter Group	AACCS1036R
Vipul H. Patel	Promoter Group	AEQPP9920C
Patel Rekhaben Vishnubhai	Promoter Group	ACKPP7022P
Patel Truptiben Vishnubhai	Promoter Group	ABHPP4048F
Bhavna Vikramkumar Patel	Promoter Group	ADGPP8496G
Alpa Dharmin Patel	Promoter Group	ABYPP7961Q
Patel Rajeshreeben Vishnubhai	Promoter Group	ACMPP1895J

  
**Vishnubhai M. Patel**  
Duly Authorised by,  
Promoters/Members of Promoter Group

Place: Ahmedabad

Date: 06/04/2015

**Note :**

I. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

(\*) 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 Stock Exchanges but shall not be disseminated.

**VISHNUBHAI M. PATEL**

**11, Hindu Colony, Opp.Sardar Patel Stadium, Navrangpura, Ahmedabad-380 009 Gujarat**

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Date : 02.04.2016

To,  
The Dy. Gen. Manager,  
Corporate Relationship Dept.,  
**Bombay Stock Exchange Limited**  
PJ Tower, Dalal Street,  
Mumbai - 400 001  
Fax No.022-22722037-39  
**Equity Scrip Code:532710**

To,  
**National Stock Exchange of India Ltd.**  
Exchange Plaza,  
Plot no. C/1, G Block,  
Bandra-Kurla Complex, Bandra (E)  
Mumbai - 400 051  
Fax No.022-26598237-38  
**Equity Scrip Name: SADBHAV**

**Sub. : Disclosures**

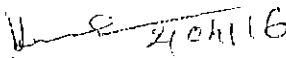
Dear Sir,

Pl find attached herewith the Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly acknowledge the documents.

Thanking You,

Yours faithfully,

  
**Vishnubhai M. Patel**  
**Duly Authorised by,**  
**Promoters/Members of Promoter Group**  
**DIN-00048287**



		11. Truptiben Vishubhai Patel 12. Patel Alpa Dharmin 13. Rajshree Vishnubhai Patel 14. Nitin R. Patel		
4	Particulars of the shareholding of person(s) mentioned at (3) above	No. of shares	% w.r.t. total share/voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
	As of March 31 <sup>st</sup> of the year, holding of:			
	<b>1) Vishnubhai M. Patel</b>			
	a) Shares	23543220	13.72	13.72
	b) Voting Rights (otherwise than by shares)	-	-	-
	c) Warrants	-	-	-
	d) Convertible securities	-	-	-
	e) Any other instrument that would entitle the holder to receive shares in the TC.	-	-	-
	<b>2) Shantaben V. Patel</b>			
	a) Shares	14715375	8.58	8.58
	<b>3) Shashin V. Patel</b>			
	a) Shares	5499720	3.21	3.21
	<b>4) Girish N. Patel</b>			
	a) Shares	675500	0.39	0.39
	<b>5) Vasistha C. Patel</b>			
	a) Shares	3202150	1.87	1.87
	<b>6) Vikramkumar R. Patel</b>			
	a) Shares	4608750	2.69	2.69
	<b>7) Santokba Trust</b>			
	a) Shares	3993840	2.33	2.33
	<b>8) Sadbhav Finstock Pvt. Ltd.</b>			
	a) Shares	16545275	9.65	9.65
	<b>9) V. M. Patel -HUF</b>			
	a) Shares	4581700	2.67	2.67
	<b>10) Vipul H. Patel</b>			
	a) Shares	166850	0.10	0.10
	<b>11) Rekhaben V. Patel</b>			
	a) Shares	675500	0.39	0.39

1-1

12) Bhavnaben V. Patel a) Shares	675500	0.39	0.39
13) Truptiben V. Patel a) Shares	675500	0.39	0.39
14) Alpa D. Patel a) Shares	675500	0.39	0.39
15) Rajshreeben V. Patel a) Shares	675500	0.39	0.39
16) Nitin R. Patel a) Shares	101	0.00	0.00
<b>TOTAL</b>	<b>80909981</b>	<b>47.16</b>	<b>47.16</b>

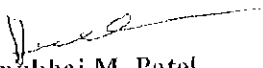
Part- B\*\*

Name of the Target Company : **Sadbhav Engineering Ltd.**

Name(s) of the person and Persons Acting in Concert(PAC) with the person	Whether the person belongs to Promoter/Promoter group	PAN of the person and PACs
Vishnubhai M. Patel	Promoter	AEHPP8757L
Shantaben V. Patel	Promoter	ABGPP7486A
Girish N. Patel	Promoter Group	ABEPP8969L
Shashin V. Patel	Promoter Group	AFRPP6274P
Vikram R. Patel	Promoter Group	ACHPP0255D
Vasistha C. Patel	Promoter Group	AAI'PP3517C
Vishnubhai M. Patel -HUF	Promoter Group	AABHP8777J
Santokba Trust	Promoter Group	AACTS2065B
Sadbhav Finstock Private Limited	Promoter Group	AACCS1036R
Vipul H. Patel	Promoter Group	AEQPP9920C
Patel Rekhaben Vishnubhai	Promoter Group	ACKPP7022P
Patel Truptiben Vishnubhai	Promoter Group	ABHPP4048F

*[Handwritten signature]*

Bhavna Vikramkumar Patel	Promoter Group	ADGPP8496G
Alpa Dharmin Patel	Promoter Group	ABYPP796IQ
Patel Rajeshreeben Vishnubhai	Promoter Group	ACMPP1895J
Nitin R. Patel	PAC	AEJPP3787Q

  
Vishnubhai M. Patel  
Duly Authorised by,  
Promoters/Members of Promoter Group

Place: Ahmedabad  
Date: 02/04/2016

Note :

1 In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

(\*) 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 Stock Exchanges but shall not be disseminated.