

CIN-U74920DL1999PTC099070

August 24, 2017

The General Manager
Corp. Relationship Deptt.
BSE Ltd.
1st. Floor, New Trading Ring,
Rotunda Building, P J Towers,
Dalal Street, Fort, Mumbai

Dear Sir,

**Sub:** Disclosures by promoter Pursuant to **regulation 7(2)(b)** of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 and of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, regulation **29(1)**.

Dear sir,

With respect to above subject matter, please find enclosed, disclosures pursuant to regulation 7(2)(b) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 and Regulation 29(1) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and copies of the same is attached herewith.

This is for your information and records.

Encl: as above

Yours faithfully,

To,
The Company Secretary
Swaraj Automotives Limited
C-127, IV Floor, Satguru Infotech,
Industrial area Phase-VIII, SAS Nagar (Mohali)-160071

For b4S Solutions Pvt. Ltd.

Director

H.O.: S-40 (Harsha Compound), Site-2, Loni Road Industrial Area, Mohan Nagar (Near Hindon Airforce Station), Ghaziabad - 201 007 PH.: (0120) 4188300, (0120) 4538300 0120-6645500 FAX: (0120) 4188333 R.O.: 806, 8th Floor, Eros Apartment, 56, Nehru Place, New Delhi-19

B.O.: 3<sup>rd</sup> Floor, "C" Wing, Eden Park, Viman Nagar, Pune (MAHARASTRA) B.O.: 169/1, 1<sup>st</sup> Floor, Gyan Tower, Mangal Pandey Nagar (MEERUT) B.O.: SCO-14 Sector-8, Main Market (Near OBC Bank) Karnal (HARYANA) B.O.: Shop No. 35, Huda Market, Sector-3, Rewari (HARYANA)

B.O.: G-1, Bombay Plaza, 21, Vidhan Shabha Marg, Near Anand Motor (LUCKNOW)

B.O.: C-127, Phase-8, Industrial Area, Mohali (PUNJAB)

B.O.: 3rd Floor, Aura Hights Building, Opp. Krishna Prem, Srover Kutia, Goniana Road, Bhatinda (Punjab)

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

Name of the Target Company (TC)	Swaraj Automotives Limited		
Name(s) of the Sellers	b4S Solutions Private Limited		
Whether the Seller belongs to	Yes		
Promoter/Promoter group			
Name(s) of the Stock Exchange(s) where the	BSE Limited	Р.	
shares of TC are Listed	***		
Details of the acquisition / disposal as follows	Number	% w.r.t. total	% w.r.t.
		share/voting	total diluted
# # # # # # # # # # # # # # # # # # #		capital	share/voting
		wherever	capital of
		applicable	the TC
Before the acquisition/disposal under			
consideration, holding of :			
a) Shares carrying voting rights	19,25,485	80.31	80.31
b) Shares in the nature of encumbrance			
(pledge/ lien/non-disposal undertaking/			
others)	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)	19,25,485	80.31	80.31





a) Shares carrying voting rights b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others) c) Voting rights (VR) otherwise than by equity shares 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) a) Total (a+b+c+/-d) After the acquisition/sale, holding of: a) Shares carrying voting rights b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others) c) Voting rights (VR) otherwise than by equity shares 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) e) Total (a+b+c+d) Mode of acquisition/sale (e.g. open market / public issue / rights in / rights issue / rights issue / rights issue / rights issue / rights in / rights issue / rights in / ri	De	tails of acquisition/sale			
b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)  c) Voting rights (VR) otherwise than by equity shares  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)  a) Total (a+b+c+/-d)  31 Total (a+b+c+/-d)  32 Total (a+b+c+/-d)  33 Total (a+b+c+/-d)  35 Total (a+b+c+/-d)  35 Total (a+b+c+/-d)  36 Total (a+b+c+/-d)  37 Total (a+b+c+/-d)  38 Total (a+b+c+/-d)  39 Total (a+b+c+/-d)  Nil NA			35.166	1.47	1.47
(pledge/ lien/non-disposal undertaking/ others)  c) Voting rights (VR) otherwise than by equity shares  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)  a) Total (a+b+c+/-d)  35,166  1.47  After the acquisition/sale, holding of:  a) Shares carrying voting rights  b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)  c) Voting rights (VR) otherwise than by equity shares  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  NA  NA  NA  NA  NA  NA  NA  NA			,		*
others)  c) Voting rights (VR) otherwise than by equity shares  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)  a) Total (a+b+c+/-d)  After the acquisition/sale, holding of:  a) Shares carrying voting rights  b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)  c) Voting rights (VR) otherwise than by equity shares  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)  e) Total (a+b+c+d)  Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue /preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  Nil NA NA  NA NA			u ,		
equity shares  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)  After the acquisition/sale, holding of:  a) Shares carrying voting rights  b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)  c) Voting rights (VR) otherwise than by equity shares  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)  P) Total (a+b+c+d)  Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale			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)  a) Total (a+b+c+l-d)  After the acquisition/sale, holding of: a) Shares carrying voting rights b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)  Nil NA NA  NA  NA  NA  NA  NA  NA  NA  NA	c)	Voting rights (VR) otherwise than by			Notice of the
instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)  a) Total (a+b+c+l-d)  After the acquisition/sale, holding of: a) Shares carrying voting rights b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)  C) Voting rights (VR) otherwise than by equity shares  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)  e) Total (a+b+c+d)  Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  Nil NA		equity shares	Nil	NA	NA
receive shares carrying voting rights in the TC (specify holding in each category)  a) Total (a+b+c+/-d)  After the acquisition/sale, holding of: a) Shares carrying voting rights b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others) c) Voting rights (VR) otherwise than by equity shares 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  NA  NA  NA  NA  NA  NA  NA  NA	d)	Warrants/convertible securities/any other			
TC (specify holding in each category)  A) Total (a+b+c+/-d)  After the acquisition/sale, holding of:  a) Shares carrying voting rights b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others) c) Voting rights (VR) otherwise than by equity shares 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) And to defere the said sale  Nil NA NA  NA  NA  NA  NA  NA  NA  NA  NA		instrument that entitles the acquirer to			
a) Total (a+b+c+/-d)  After the acquisition/sale, holding of: a) Shares carrying voting rights b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others) c) Voting rights (VR) otherwise than by equity shares 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) Nil NA NA NA e) Total (a+b+c+d) Nil NA NA Pursuant to Offer for Sale  Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.) Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable Equity share capital / total voting capital of the TC before the said sale  To before the said sale		receive shares carrying voting rights in the			
After the acquisition/sale, holding of:  a) Shares carrying voting rights b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others) c) Voting rights (VR) otherwise than by equity shares 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) 18,90,319 78.84 78.84  Pursuant to Offer for Sale  Pursuant to Offer for Sale  Pursuant to Offer for Sale  August 22, 2017 to August 23, 2017  August 22, 2017 to August 23, 2017  August 23, 2017  Equity share capital / total voting capital of the TC before the said sale  Thirty Nine Lacs Seventy Seven Thousand and		TC (specify holding in each category)	Nil	NA	NA
a) Shares carrying voting rights b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others) C) Voting rights (VR) otherwise than by equity shares 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) Nil NA NA  P) Total (a+b+c+d) Nil NA NA  R)  R)  R)  R)  R)  R)  R)  R)  R)  R	a)	Total (a+b+c+/-d)	35,166	1.47	1.47
b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)  Nill NA NA  NA  NA  NA  NA  NA  NA  NA  NA	Af	ter the acquisition/sale, holding of:			=
(pledge/ lien/non-disposal undertaking/ others)  Nil NA NA  NA  NA  NA  NA  NA  NA  NA  NA	a)	Shares carrying voting rights	18,90,319	78.84	· 78.84
others)  Others)  Otherwise than by equity shares  Nil NA NA  NA  NA  NA  NA  NA  NA  NA  NA	b)	Shares in the nature of encumbrance		gs 1	
c) Voting rights (VR) otherwise than by equity shares  Mil NA NA  NA  NA  NA  NA  NA  NA  NA  NA	-	(pledge/ lien/non-disposal undertaking/		_ 0	-
equity shares  Mil NA NA  NA  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  Porticular (a+b+c+d)  Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  Nil NA NA  NA  NA  NA  NA  NA  NA  NA  NA		others)	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)  Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  Thirty Nine Lacs Seventy Seven Thousand and	c)	Voting rights (VR) otherwise than by	75		
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)  Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  Nil NA NA  Pursuant to Offer for Sale  August 22, 2017 to August 23, 2017  August 22, 2017 to August 23, 2017  Rs. 23,977,130 (Rupees Two Crores and Thirty Nine Lacs Seventy Seven Thousand and		equity shares	Nil	NA	NA
receive shares carrying voting rights in the TC (specify holding in each category)  Nil NA NA  18,90,319  78.84  78.84  Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  Nil NA NA  NA  August 22, 2017 to August 23, 2017  August 22, 2017 to August 23, 2017  Rs. 23,977,130 (Rupees Two Crores and Thirty Nine Lacs Seventy Seven Thousand and	d)	Warrants/convertible securities/any other	*	13	
TC (specify holding in each category)  Nil NA NA  e) Total (a+b+c+d)  Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue /preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  NA NA  NA NA  NA NA  NA NA  NA  Rs. 23,973,130 (Rupees Two Crores and Thirty Nine Lacs Seventy Seven Thousand and		instrument that entitles the acquirer to	-	*	
e) Total (a+b+c+d)  Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue //preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  18,90,319  Pursuant to Offer for Sale  August 22, 2017 to August 23, 2017  August 22, 2017 to August 23, 2017  Rs. 23,977,130 (Rupees Two Crores and Thirty Nine Lacs Seventy Seven Thousand and		receive shares carrying voting rights in the		- = =	(S)
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  Pursuant to Offer for Sale  August 22, 2017 to August 23, 2017  August 22, 2017 to August 23, 2017  Rs. 23,977,130 (Rupees Two Crores and Thirty Nine Lacs Seventy Seven Thousand and		TC (specify holding in each category)	Nil	NA	NA
off-market / public issue / rights issue /preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  To before the said sale  To before the said sale  Interval 22, 2017 to August 23, 2017  August 22, 2017 to August 23, 2017  August 22, 2017 to August 23, 2017  August 23, 2017  August 23, 2017  Thirty Nine Lacs Seventy Seven Thousand and	e)	Total (a+b+c+d)	18,90,319	78.84	78.84
/preferential allotment / inter-se transfer etc.)  Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  August 22, 2017 to August 23, 2017  August 22, 2017 to August 23, 2017  August 22, 2017 to August 23, 2017  August 23, 2017  Fix. 23,977,130 (Rupees Two Crores and Thirty Nine Lacs Seventy Seven Thousand and	Mo	ode of acquisition/sale (e.g. open market /	Pursuant to Of	fer for Sale	· i
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  August 22, 2017 to August 23, 2017  August 22, 2017 to August 23, 2017  August 23, 2017  August 23, 2017  Rs. 23,977,130 (Rupees Two Crores and Thirty Nine Lacs Seventy Seven Thousand and	off	-market / public issue / rights issue			* * * * * * * * * * * * * * * * * * *
date of receipt of intimation of allotment of shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  Rs. 23,977,130 (Rupees Two Crores and Thirty Nine Lacs Seventy Seven Thousand and	/preferential allotment / inter-se transfer etc.)		- 1 m		
shares, whichever is applicable  Equity share capital / total voting capital of the TC before the said sale  Rs. 23,977,130 (Rupees Two Crores and Thirty Nine Lacs Seventy Seven Thousand and	Da	te of acquisition / sale of shares / VR or	August 22, 2017 to August 23, 2017		
Equity share capital / total voting capital of the TC before the said sale  Rs. 23,977,130 (Rupees Two Crores and Thirty Nine Lacs Seventy Seven Thousand and	da	te of receipt of intimation of allotment of	y		
TC before the said sale  Thirty Nine Lacs Seventy Seven Thousand and	sh	ares, whichever is applicable	1		740 g
	Eq	uity share capital / total voting capital of the	Rs. 23,977,130 (Rupees Two Crores and		
One Thirty Only) comprising of 2,397,713	TC	before the said sale	Thirty Nine Lacs Seventy Seven Thousand and		
			One Thirty C	Only) comprising	of 2,397,713

no

	(Twenty Three Lacs and Ninety Seven
	Thousand Seven Hundred and Thirteen)
	Equity Shares of Rs. 10/- (Rupees Ten) each
Equity share capital/ total voting capital of the	Rs. 23,977,130 (Comprising of 23,97,713
TC after the said acquisition/sale	Equity Shares of Rs. 10/- each)
Total diluted share/voting capital of the TC	Rs. 23,977,130 (Comprising of 23,97,713
after the said acquisition/sale	Equity Shares of Rs. 10/- each)

Date: August 24, 2017

Place: Ghaziabad