

GUARDIAN ADVISORS PVT. LTD.

To,

25/01/2018

The Bombay Stock Exchange

&

National Stock Exchange

&

Khaitan (India) Limited

Subject- Disclosure under Regulation 29(1) of SEBI SAST Regulations.

Dear Sir/ Madam

Guardian Advisors Private Limited (GA) which is a SEBI registered portfolio manager wishes to inform the NSE, BSE and Khaitan (India) Limited that it on behalf of its clients, GA and Persons Acting in Concert has acquired a stake of 5% equity stake in Khaitan (India) Limited under various client accounts (Attached in Annexure 1).

The ownership of the underlying asset vests with the client and GA has the power of attorney to manage these client accounts.

Please note that the clients and PAC are only acting in concert with the monies and client accounts given to the Portfolio manager to manage under the discretionary PMS and not in any other account or entity managed by themselves or any other intermediary.

Yours Sincerely



Sidharth Jain

Compliance Officer

Guardian Advisors Private Limited



भारतीय प्रतिभूति और विनिमय बोर्ड Securities and Exchange Board of India

Format for 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)	KHAITAN (INDIA) LTD		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	GUARDIAN ADVISORS PRIVATE LIMITED ON BEHALF OF CLIENTS ATTACHED IN ANNEXURE-1		
Whether the acquirer belongs to Promoter/Promoter group	NO		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE & NSE		
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) 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)	2,35,072	4.949%	4.949%
Details of acquisition			
a) Shares carrying voting rights acquired			
b) VRs acquired 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)	7,833	0.165%	0.165%

Sai



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category) acquired d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others) e) Total (a+b+c+/-d)			
After the acquisition, holding of acquirer along with PACs of: a) Shares carrying voting rights b) VRs 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) after acquisition d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others) e) Total (a+b+c+d)	2,42,905	5.114%	5.114%
Mode of acquisition (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer/encumbrance, etc.)	OPEN MARKET		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.			
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.	23/01/2018		
Equity share capital / total voting capital of the TC before the said acquisition	47,50,000		
Equity share capital/ total voting capital of the TC after the said acquisition	47,50,000		
Total diluted share/voting capital of the TC after the said acquisition	47,50,000		


Signature of the acquirer/seller/Authorised Signatory

Place : New Delhi

Date : 25.01.2018

GUARDIAN ADVISORS PVT. LTD.

ANNEXURE-1

KHAITAN (INDIA) LTD

S. No	Name of the acquirer and Person acting in Concert (PAC) with the acquirer	Whether the acquirer belongs to Promotor/Promoter Group	PAN of the acquirer and/or PACs	Qty
1	Hemshi Robert	No	AIAPB6609G	10,000
2	Nitesh Jain	No	ADKPJ2862J	19,500
3	Nitesh Jain HUF	No	AAFHN9745N	19,996
4	Nitin R. Masilamani	No	AIAPM1835B	19,493
5	Payal Gupta	No	AISPG7805P	10,164
6	Priyank Gupta	No	AFEPG5776L	8,000
7	Priyank Gupta HUF	No	AAIHP2302Q	9,482
8	Ramji Das	No	AJFPD7185H	10,000
9	R.J. Masilamani	No	AAIPM3594P	19,985
10	Rahul Bammi HUF	No	AAKHR6066B	19,801
11	Ruchir Gupta	No	ACXPG2334E	10,000
12	Ruchir Gupta HUF	No	AALHR8587A	16,844
13	Rupali Nitesh Jain	No	AFYPJ2735C	19,950
14	Sanjay Sachdeva HUF	No	AAVHS3454D	19,790
15	Vertika Agarwal	No	AQOPA3174H	10,000
16	Vishal Garg HUF	No	AAHHV0940H	19,900
	Total:			242,905

% as a total of equity capital
Total Equity Shares

5.114%
4,750,000

Sai
25/01/2018