

SUNTRACK COMMERCE PRIVATE LIMITED

CIN : U15520WB1988PTC045076

Regd. Office :
687, Anandapur, E. M. Bypass, 2nd Floor
Kolkata - 700 107 Phone : 6613 6264
E-mail : panemamics @emamigroup.com
Fax : 033 6613 6242

Date: 16.11.2018

The Secretary

National Stock Exchange of India Limited
Exchange Plaza
Plot No. C/1, G Block
Bandra-Kurla Complex
Bandra(E)
Mumbai - 400 051

The Secretary

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai - 400 001

The Secretary

The Calcutta Stock Exchange Limited
7, Lyons Range
Kolkata - 700 001

The Company Secretary

Emami Limited
687, Anandapur
EM Bypass
Kolkata - 700 107

Dear Sir,

Sub: Disclosure under Regulation 31(1) & 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

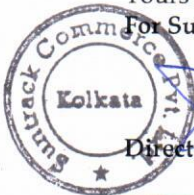
Please find enclosed herewith Disclosure in terms of Regulation 31(1) & 31(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

This is for your information & record.

Thanking you,

Yours faithfully,

For Suntrack Commerce Private Limited



Paulo
Director/Authorized Signatory

On Behalf of himself, Promoter & Promoter Group Persons/ Persons Acting in Concert

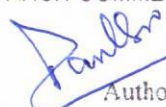
Place: Kolkata

Encl: a/a

Disclosure by the Promoter (s) to the Stock Exchanges and to the Target Company for encumbrance of shares /~~invocation of encumbrance~~/release of encumbrance, in terms of Regulation 31(1) & 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

| Name of the Target company (TC) | | | | | EMAMI LIMITED | | | | | | | | | |
|---|--|--------------------------|---|--------------------------|--|--|--|------------------------|--------|--------------------|---|-------------|---|--|
| Names of the Stock Exchanges where the shares of the target company are listed | | | | | NATIONAL STOCK EXCHANGE OF INDIA LIMITED BSE LIMITED AND THE CALCUTTA STOCK EXCHANGE LIMITED | | | | | | | | | |
| Date of reporting | | | | | 16.11.2018 | | | | | | | | | |
| Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked | | | | | SUNTRACK COMMERCE PRIVATE LIMITED | | | | | | | | | |
| Details of the creation/ invocation /release of encumbrance: | | | | | | | | | | | | | | |
| Name of the Promoter (s) or PACs with him(*) | Promoter holding in the target company (1) | | Promoter holding already encumbered (2) | | Details of events pertaining to encumbrance (3) | | | | | | | | Post event holding of encumbered shares {creation (2)+(3)} / release [(2)-(3)] / invocation [(2)-(3)] | |
| | Number | % of total share capital | Number | % of total share capital | Type of event (creation / release / invocation) | Date of creation/ release/ invocation of encumbrance | Type of encumbrance (pledge/ lien/ non disposal undertaking /others) | Reason for encumbrance | Number | % of share capital | Name of the entity in whose favor shares encumbered | Number | % of Total share capital | |
| Suntrack Commerce Private Limited | 6,62,73,107 | 14.5997 | 3,40,80,280 | 7.5077 | Creation | 14.11.2018 | Pledge | Collateral Pledge | 174000 | 0.0383 | IDBI Trusteeship Services Limited and ICICI Prudential Asset Management Company Limited | 3,42,54,280 | 7.5461 | |
| Suntrack Commerce Private Limited | 6,62,73,107 | 14.5997 | 3,42,54,280 | 7.5461 | Creation | 14.11.2018 | Pledge | Collateral Pledge | 135000 | 0.0297 | IDBI Trusteeship Services Limited and ICICI Prudential Asset Management Company Limited | 3,43,89,280 | 7.5758 | |
| Suntrack Commerce Private Limited | 6,62,73,107 | 14.5997 | 3,43,89,280 | 7.5758 | Creation | 14.11.2018 | Pledge | Collateral Pledge | 24000 | 0.0053 | Aditya Birla Finance Limited | 3,44,13,280 | 7.5811 | |

For SUNTRACK COMMERCE PVT. LTD.


 Authorised Signatory

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|-----------------------------------|-------------|---------|-------------|--------|----------|------------|--------|--------------------|--------|--------|---|-------------|--------|
| Suntrack Commerce Private Limited | 6,62,73,107 | 14.5997 | 3,44,13,280 | 7.5811 | Creation | 14.11.2018 | Pledge | Collateral Pledge | 46000 | 0.0101 | Aditya Birla Finance Limited | 3,44,59,280 | 7.5912 |
| Suntrack Commerce Private Limited | 6,62,73,107 | 14.5997 | 3,44,59,280 | 7.5912 | Creation | 14.11.2018 | Pledge | Third Party Pledge | 298000 | 0.0656 | IDBI Trusteeship Services Limited and ICICI Prudential Asset Management Company Limited | 3,47,57,280 | 7.6569 |
| Bhanu Vyapaar Private Limited | 5,55,85,902 | 12.2453 | 4,09,82,000 | 9.0282 | Release | 14.11.2018 | Others | Third Party Pledge | 64813 | 0.0143 | Bajaj Finance Limited | 4,09,17,187 | 9.0139 |
| Bhanu Vyapaar Private Limited | 5,55,85,902 | 12.2453 | 4,09,17,187 | 9.0139 | Release | 14.11.2018 | Others | Third Party Pledge | 100209 | 0.0221 | Bajaj Finance Limited | 4,08,16,978 | 8.9918 |
| Bhanu Vyapaar Private Limited | 5,55,85,902 | 12.2453 | 4,08,16,978 | 8.9918 | Release | 14.11.2018 | Others | Collateral Pledge | 300000 | 0.0661 | IIFL Wealth | 4,05,16,978 | 8.9257 |
| Bhanu Vyapaar Private Limited | 5,55,85,902 | 12.2453 | 4,05,16,978 | 8.9257 | Release | 14.11.2018 | Others | Collateral Pledge | 140093 | 0.0309 | Bajaj Finance Limited | 4,03,76,885 | 8.8949 |
| Bhanu Vyapaar Private Limited | 5,55,85,902 | 12.2453 | 4,03,76,885 | 8.8949 | Release | 14.11.2018 | Others | Third Party Pledge | 171000 | 0.0377 | Bajaj Finance Limited | 4,02,05,885 | 8.8572 |
| Bhanu Vyapaar Private Limited | 5,55,85,902 | 12.2453 | 4,02,05,885 | 8.8572 | Release | 14.11.2018 | Others | Third Party Pledge | 96720 | 0.0213 | Bajaj Finance Limited | 4,01,09,165 | 8.8359 |
| Diwakar Viniyog Private Limited | 6,75,44,849 | 14.8798 | 4,04,22,133 | 8.9048 | Creation | 14.11.2018 | Pledge | Collateral Pledge | 6000 | 0.0013 | Aditya Birla Finance Limited | 4,04,28,133 | 8.9061 |

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|-----------------------------------|-------------|---------|-------------|--------|----------|------------|--------|-------------------|----------|--------|---|-------------|--------|
| Diwakar Viniyog Private Limited | 6,75,44,849 | 14.8798 | 4,04,28,133 | 8.9061 | Creation | 14.11.2018 | Pledge | Collateral Pledge | 3000 | 0.0007 | Aditya Birla Finance Limited | 4,04,31,133 | 8.9068 |
| TMT Viniyogan Limited | 97,33,160 | 2.1442 | 41,92,000 | 0.9235 | Release | 14.11.2018 | Others | Collateral Pledge | 1,44,581 | 0.0319 | Collateral Pledge Bajaj Finance Limited | 40,47,419 | 0.8916 |
| Raviraj Viniyog Private Limited | 2,77,73,584 | 6.1184 | 1,17,24,000 | 2.5827 | Creation | 14.11.2018 | Pledge | Collateral Pledge | 1,02,000 | 0.0225 | IDBI Trusteeship Services Limited and ICICI Prudential Asset Management Company Limited | 1,18,26,000 | 2.6052 |
| Prabhakar Viniyog Private Limited | 2,64,01,492 | 5.8161 | 92,51,000 | 2.0383 | Creation | 14.11.2018 | Pledge | Collateral Pledge | 1,02,000 | 0.0225 | IDBI Trusteeship Services Limited and ICICI Prudential Asset Management Company Limited | 93,53,000 | 2.0604 |
| Prabhakar Viniyog Private Limited | 2,64,01,492 | 5.8161 | 93,53,000 | 2.0604 | Creation | 14.11.2018 | Pledge | Collateral Pledge | 1,00,000 | 0.0220 | IDBI Trusteeship Services Limited and ICICI Prudential Asset Management Company Limited | 94,53,000 | 2.0825 |

For SUNTRACK COMMERCE PVT. LTD.


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On Behalf of himself, Promoter & Promoter Group Persons/ Persons Acting in Concert

Place: Kolkata

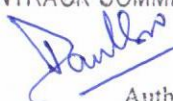
Date: 16.11.2018

Annexure "A"

DISCLOSURE BY THE PROMOTER (S) TO THE STOCK EXCHANGES AND TO THE TARGET COMPANY FOR ENCUMBRANCE OF SHARES/INVOCATION OF ENCUMBRANCE/RELEASE OF ENCUMBRANCE, IN TERMS OF REGULATION 31(1) & 31(2) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011

| Name of the Promoter (s) or PACs with him(**) | Promoter holding in the target company (1) | | | Promoter holding already encumbered (2) | | Details of events pertaining to encumbrance (3) | | | | | | Post event holding of encumbered shares {creation (2)+(3)} / release [(2)-(3)] / invocation [(2)-(3)] | |
|---|--|--------------------------|-----------------------------------|---|--------------------------|---|---|--|---------------|--------------------------|---|---|--------------------------|
| | No. of Shares | % of total share capital | % w.r.t diluted share capital (*) | No. of shares | % of total share capital | Type of event (creation /release /invocation) | Date of creation/ invocation release of encumbrance | Type of encumbrance (pledge/ lien/ non disposal undertaking /others) | No. of shares | % of total share capital | Name of the entity in whose favor shares encumbered | No. of Shares | % of Total share capital |
| PRITI A SUREKA | 11609702 | 2.5576 | 2.5576 | - | - | - | - | - | - | - | - | - | - |
| ADITYA VARDHAN AGARWAL | 634668 | 0.1398 | 0.1398 | - | - | - | - | - | - | - | - | - | - |
| USHA AGARWAL | 673096 | 0.1483 | 0.1483 | - | - | - | - | - | - | - | - | - | - |
| RAJ KUMAR GOENKA | 1547964 | 0.3410 | 0.3410 | - | - | - | - | - | - | - | - | - | - |
| RADHE SHYAM AGARWAL | 879000 | 0.1936 | 0.1936 | - | - | - | - | - | - | - | - | - | - |
| ROHIN RAJ SUREKA | 3500000 | 0.7710 | 0.7710 | - | - | - | - | - | - | - | - | - | - |
| HARSHA VARDHAN AGARWAL | 110266 | 0.0243 | 0.0243 | - | - | - | - | - | - | - | - | - | - |
| SASWAT GOENKA | 1130000 | 0.2489 | 0.2489 | - | - | - | - | - | - | - | - | - | - |
| SACHIN GOENKA | 1069000 | 0.2355 | 0.2355 | - | - | - | - | - | - | - | - | - | - |
| VIBHASH VARDHAN | 1073478 | 0.2365 | 0.2365 | - | - | - | - | - | - | - | - | - | - |

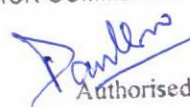
For SUNTRACK COMMERCE PVT. LTD.



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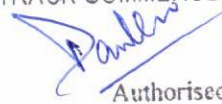
| | | | | | | | | | | | | | |
|-----------------------------|---------|--------|--------|---|---|---|---|---|---|---|---|---|---|
| AGARWAL | | | | | | | | | | | | | |
| VIHAN VARDHAN AGARWAL | 1072000 | 0.2362 | 0.2362 | - | - | - | - | - | - | - | - | - | - |
| ADVAY GOENKA | 1004000 | 0.2212 | 0.2212 | - | - | - | - | - | - | - | - | - | - |
| RITU GOENKA | 904930 | 0.1994 | 0.1994 | - | - | - | - | - | - | - | - | - | - |
| RADHE SHYAM GOENKA | 906276 | 0.1996 | 0.1996 | - | - | - | - | - | - | - | - | - | - |
| CHIKKY GOENKA | 611700 | 0.1348 | 0.1348 | - | - | - | - | - | - | - | - | - | - |
| SOBHNA AGARWAL | 630000 | 0.1388 | 0.1388 | - | - | - | - | - | - | - | - | - | - |
| JYOTI AGARWAL | 488000 | 0.1075 | 0.1075 | - | - | - | - | - | - | - | - | - | - |
| DEVARSH GOENKA | 607750 | 0.1339 | 0.1339 | - | - | - | - | - | - | - | - | - | - |
| REYANSH GOENKA | 607750 | 0.1339 | 0.1339 | - | - | - | - | - | - | - | - | - | - |
| AVISHI SUREKA | 1400000 | 0.3084 | 0.3084 | - | - | - | - | - | - | - | - | - | - |
| SHRUTI GOENKA | 546130 | 0.1203 | 0.1203 | - | - | - | - | - | - | - | - | - | - |
| INDU GOENKA | 919700 | 0.2026 | 0.2026 | - | - | - | - | - | - | - | - | - | - |
| DARSH GOENKA | 565000 | 0.1245 | 0.1245 | - | - | - | - | - | - | - | - | - | - |
| MANAN GOENKA | 565000 | 0.1245 | 0.1245 | - | - | - | - | - | - | - | - | - | - |
| NIKUNJ GOENKA | 565000 | 0.1245 | 0.1245 | - | - | - | - | - | - | - | - | - | - |
| SAROJ GOENKA | 965240 | 0.2126 | 0.2126 | - | - | - | - | - | - | - | - | - | - |
| MANSI AGARWAL | 150000 | 0.0330 | 0.0330 | - | - | - | - | - | - | - | - | - | - |
| NIMISHA GOENKA | 494000 | 0.1088 | 0.1088 | - | - | - | - | - | - | - | - | - | - |
| MANISH GOENKA | 492196 | 0.1084 | 0.1084 | - | - | - | - | - | - | - | - | - | - |

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|------------------------------------|--------|--------|--------|-------|--------|---|---|---|---|---|---|-------|--------|
| SHREYA GOENKA | 480000 | 0.1057 | 0.1057 | - | - | - | - | - | - | - | - | - | - |
| VIDISHA AGARWAL | 480000 | 0.1057 | 0.1057 | - | - | - | - | - | - | - | - | - | - |
| VIDULA AGARWAL | 480000 | 0.1057 | 0.1057 | - | - | - | - | - | - | - | - | - | - |
| JAYANT GOENKA | 464254 | 0.1023 | 0.1023 | - | - | - | - | - | - | - | - | - | - |
| RASHMI GOENKA | 371400 | 0.0818 | 0.0818 | - | - | - | - | - | - | - | - | - | - |
| SANTOSH GOENKA | 396240 | 0.0873 | 0.0873 | - | - | - | - | - | - | - | - | - | - |
| SUSHIL KUMAR GOENKA | 358500 | 0.0790 | 0.0790 | - | - | - | - | - | - | - | - | - | - |
| RACHANA GOENKA | 317700 | 0.0700 | 0.0700 | - | - | - | - | - | - | - | - | - | - |
| SMRITI AGARWAL | 334000 | 0.0736 | 0.0736 | 40000 | 0.0088 | - | - | - | - | - | - | 40000 | 0.0088 |
| RICHA AGARWAL | 291722 | 0.0643 | 0.0643 | - | - | - | - | - | - | - | - | - | - |
| JYOTI GOENKA | 248776 | 0.0548 | 0.0548 | - | - | - | - | - | - | - | - | - | - |
| MOHAN GOENKA | 261900 | 0.0577 | 0.0577 | - | - | - | - | - | - | - | - | - | - |
| RACHNA BAGARIA | 270000 | 0.0595 | 0.0595 | - | - | - | - | - | - | - | - | - | - |
| YOGESH GOENKA | 245400 | 0.0541 | 0.0541 | - | - | - | - | - | - | - | - | - | - |
| REHA GOENKA | 240000 | 0.0529 | 0.0529 | - | - | - | - | - | - | - | - | - | - |
| PUJA GOENKA | 169398 | 0.0373 | 0.0373 | - | - | - | - | - | - | - | - | - | - |
| ADITYA VARDHAN AGARWAL, KARTA(HUF) | 204278 | 0.0450 | 0.0450 | - | - | - | - | - | - | - | - | - | - |
| HARSH VARDHAN AGARWAL, KARTA (HUF) | 172000 | 0.0379 | 0.0379 | - | - | - | - | - | - | - | - | - | - |

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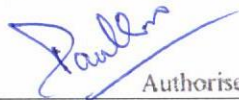
| | | | | | | | | | | | | | |
|--|--------|--------|--------|---|---|---|---|---|---|---|---|---|---|
| MOHAN GOENKA, KARTA (HUF) | 174000 | 0.0383 | 0.0383 | - | - | - | - | - | - | - | - | - | - |
| MANISH GOENKA, KARTA (HUF) | 174000 | 0.0383 | 0.0383 | - | - | - | - | - | - | - | - | - | - |
| SUSHIL KUMAR GOENKA, KARTA (HUF) | 174000 | 0.0383 | 0.0383 | - | - | - | - | - | - | - | - | - | - |
| PRASHANT GOENKA | 190000 | 0.0419 | 0.0419 | - | - | - | - | - | - | - | - | - | - |
| ASHISH GOENKA | 130000 | 0.0286 | 0.0286 | - | - | - | - | - | - | - | - | - | - |
| LAXMI DEVI BAJORIA | 143000 | 0.0315 | 0.0315 | - | - | - | - | - | - | - | - | - | - |
| PRASHANT GOENKA, KARTA (HUF) | 74000 | 0.0163 | 0.0163 | | | | | | | | | | |
| JAYANT GOENKA, KARTA (HUF) | 74000 | 0.0163 | 0.0163 | | | - | - | - | - | - | - | - | - |
| ASHISH GOENKA, KARTA (HUF) | 74000 | 0.0163 | 0.0163 | | | - | - | - | - | - | - | - | - |
| MADAN LAL AGARWAL | 60000 | 0.0132 | 0.0132 | | | - | - | - | - | - | - | - | - |
| PRADEEP AGARWAL | 31150 | 0.0069 | 0.0069 | | | - | - | - | - | - | - | - | - |
| KUSUM AGARWAL | 37800 | 0.0083 | 0.0083 | - | - | - | - | - | - | - | - | - | - |
| DIVYA AGARWAL | 26000 | 0.0057 | 0.0057 | - | - | - | - | - | - | - | - | - | - |
| SANGITA AGARWAL | 26000 | 0.0057 | 0.0057 | - | - | - | - | - | - | - | - | - | - |
| SHUBHAM | 24460 | 0.0054 | 0.0054 | | | | | | | | | | |

For SUNTRACK COMMERCE PVT. LTD.

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|--|-------------|--------|--------|---------|--------|---|---|---|---|---|---|-----------|--------|
| AGARWAL | | | | - | - | - | - | - | - | - | - | - | - |
| ABHISHEK AGARWAL | 24000 | 0.0053 | 0.0053 | - | - | - | - | - | - | - | - | - | - |
| DHIRAJ AGARWAL | 16750 | 0.0037 | 0.0037 | - | - | - | - | - | - | - | - | - | - |
| VISHAL AGARWAL | 8200 | 0.0018 | 0.0018 | - | - | - | - | - | - | - | - | - | - |
| SUMANGAL AGARWAL | 8200 | 0.0018 | 0.0018 | - | - | - | - | - | - | - | - | - | - |
| EMAMI PAPER MILLS LTD | 933000 | 0.2055 | 0.2055 | - | - | - | - | - | - | - | - | - | - |
| EPL SECURITIES LTD | 84000 | 0.0185 | 0.0185 | - | - | - | - | - | - | - | - | - | - |
| EMAMI FRANK ROSS LIMITED | 10000 | 0.0022 | 0.0022 | - | - | - | - | - | - | - | - | - | - |
| SURAJ VINIYOG PRIVATE LIMITED | 2,59,15,848 | 5.7092 | 5.7092 | - | - | - | - | - | - | - | - | 94,46,000 | 2.0809 |
| AMITABH GOENKA | 7571496 | 1.6680 | 1.6680 | 4137700 | 0.9115 | - | - | - | - | - | - | 4137700 | 0.9115 |
| AMITABH GOENKA, KARTA (HUF) | 74000 | 0.0163 | 0.0163 | - | - | - | - | - | - | - | - | - | - |

For SUNTRACK COMMERCE PVT. LTD.



Authorised Signatory

On behalf of himself, Promoter & Promoter Group Persons/Persons Acting in Concert

Place: Kolkata

Date: 16.11.2018