

# SARASWATI COMMERCIAL (INDIA) LTD.

Regd. Off.: 209 - 210, Arcadia Building, 2nd Floor, 195, Nariman Point, Mumbai - 400 021.  
Telephone : 6670 8600 Fax : 6670 8650 CIN : L51909MH1983PLC166605

Website: [www.saraswaticommercial.com](http://www.saraswaticommercial.com)  
E-mail: [saraswati.investor@gcvl.in](mailto:saraswati.investor@gcvl.in)

February 8, 2018

To,  
Corporate Relationship Department  
BSE Limited  
P. J. Towers, 1st Floor,  
Dalal Street,  
Mumbai - 400 023.

**Sub: Disclosure under regulation 29(2) of SEBI (Substantial Acquisition of shares and Takeovers) Regulation, 2011.**

With reference to the captioned subject, enclosed herewith please find the disclosure as required under regulation 29(2) of SEBI (Substantial Acquisition of shares and Takeovers) Regulation, 2011 by the promoters of Saraswati Commercial (India) Limited.

Kindly take the same on your record and oblige.

Thanking You,

Yours faithfully

For Saraswati Commercial (India) Limited



Avani Sanghavi

Company Secretary & Compliance Officer



Encl.: As above.

# ASHWIN KOTHARI

Flat No 4, Gold Cornet, First Floor 11 Navrojee Gamadia Road, Mumbai 400026

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February 8, 2018

To  
The Board of Directors  
Saraswati Commercial (India) Limited  
209/210, Arcadia Building, 2<sup>nd</sup> Floor,  
Plot No. 195, Nariman Point,  
Mumbai – 400021.

To  
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**ASHWIN KOTHARI**  
**AUTHORISED SIGNATORY**

Encl.: As above.

**Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

|   |   |  |   |
|---|---|--|---|
| Name of the Target Company (TC)   | Saraswati Commercial (India) Limited  |  |   |
| Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer | <ol style="list-style-type: none"> <li>1. Ashwin Kothari</li> <li>2. Rohit Kothari</li> <li>3. Meena Kothari</li> <li>4. Ashwin Kumar Kothari (s) (HUF)</li> <li>5. Ashwin Kumar Kothari (HUF)</li> <li>6. Pannalal C. Kothari (HUF)</li> <li>7. Harisingh Shyamsukha</li> <li>8. Niyati Mehta</li> <li>9. GeeCee Investments Limited</li> <li>10. Winro Commercial (India) Limited</li> <li>11. Sam-Jag-Deep Investments Private Limited</li> <li>12. Four Dimensions Securities (India) Limited</li> <li>13. Four Dimensions Commodities Private Limited</li> </ol> |  |   |
| Whether the acquirer belongs to Promoter/Promoter group                       | Yes   |  |   |
| Name(s) of the Stock Exchange(s) where the shares of TC are Listed            | BSE Limited   |  |   |
| Details of the acquisition / disposal as follows                              | <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> |
| <b>Before the acquisition/disposal under consideration, holding of :</b>      |   |  |   |
| a) Shares carrying voting rights  |   |  |   |
| - Ashwin Kothari  | 64,849  | 6.29   | 6.29  |
| - Rohit Kothari   | 44,742  | 4.34   | 4.34  |
| - Meena Kothari   | 20,540  | 1.99   | 1.99  |
| - Ashwin Kumar Kothari (s) (HUF)  | 63,029  | 6.12   | 6.12  |
| - Ashwin Kumar Kothari (HUF)  | 63,006  | 6.11   | 6.11  |
| - Pannalal C. Kothari (HUF)   | 54125   | 5.25   | 5.25  |



|  |               |              |              |
|--|---------------|--------------|--------------|
| - Harisingh Shyamsukha   | 11            | 0.00         | 0.00         |
| - Niyati Mehta   | 22000         | 2.13         | 2.13         |
| - GeeCee Investments Limited   | 7861          | 0.76         | 0.76         |
| - Winro Commercial (India) Limited   | 177584        | 17.23        | 17.23        |
| - Sam-Jag-Deep Investments Private Limited   | 1,450         | 0.14         | 0.14         |
| - Four Dimensions Securities (India) Limited   | 205787        | 19.97        | 19.97        |
| - Four Dimensions Commodities Private Limited  | 31,000        | 3.01         | 3.01         |
| b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/ others)  | NA            | NA           | NA           |
| c) Voting rights (VR) otherwise than by equity shares  | NA            | 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)               | NA            | NA           | NA           |
| <b>e) Total (a+b+c+d)</b>  | <b>755984</b> | <b>73.35</b> | <b>73.35</b> |
| <b>Details of acquisition/sale</b>   |               |              |              |
| a) Shares carrying voting rights acquired/sold   |               |              |              |
| - Ashwin Kothari   | 3768          | 0.37         | 0.37         |
| - Rohit Kothari  | 2601          | 0.25         | 0.25         |
| - Meena Kothari  | 1193          | 0.12         | 0.12         |
| - Ashwin Kumar Kothari (s) (HUF)   | 3663          | 0.36         | 0.36         |
| - Ashwin Kumar Kothari (HUF)   | 3663          | 0.36         | 0.36         |
| - Pannalal C. Kothari (HUF)  | 3146          | 0.31         | 0.31         |
| - Harisingh Shyamsukha   | 0             | 0.00         | 0.00         |
| - Niyati Mehta   | 0             | 0.00         | 0.00         |
| - GeeCee Investments Limited   | 0             | 0.00         | 0.00         |
| - Winro Commercial (India) Limited   | 0             | 0.00         | 0.00         |
| - Sam-Jag-Deep Investments Private Limited   | 0             | 0.00         | 0.00         |
| - Four Dimensions Securities (India) Limited   | 0             | 0.00         | 0.00         |
| - Four Dimensions Commodities Private Limited  | 0             | 0.00         | 0.00         |
| b) VRs acquired /sold otherwise than by shares   | NA            | NA           | NA           |
| 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) acquired/sold | NA            | NA           | NA           |
| d) Shares encumbered / invoked/released by the acquirer.   | NA            | NA           | NA           |
| <b>Total (a+b+c+/-d)</b>   | <b>18034</b>  | <b>1.75</b>  | <b>1.75</b>  |

|  |  |                       |                       |
|--|--|-----------------------|-----------------------|
| <b>After the acquisition/sale, holding of:</b>   |  |                       |                       |
| a) Shares carrying voting rights   |  |                       |                       |
| - Ashwin Kothari   | 61081  | 6.10                  | 6.10                  |
| - Rohit Kothari  | 42141  | 4.21                  | 4.21                  |
| - Meena Kothari  | 19347  | 1.93                  | 1.93                  |
| - Ashwin Kumar Kothari (s) (HUF)   | 59366  | 5.93                  | 5.93                  |
| - Ashwin Kumar Kothari (HUF)   | 59343  | 5.93                  | 5.93                  |
| - Pannalal C. Kothari (HUF)  | 50979  | 5.09                  | 5.09                  |
| - Harisingh Shyamsukha   | 11   | 0.00                  | 0.00                  |
| - Niyati Mehta   | 22000  | 2.20                  | 2.20                  |
| - GeeCee Investments Limited   | 7861   | 0.79                  | 0.79                  |
| - Winro Commercial (India) Limited   | 177584   | 17.74                 | 17.74                 |
| - Sam-Jag-Deep Investments Private Limited   | 1450   | 0.14                  | 0.14                  |
| - Four Dimensions Securities (India) Limited   | 205787   | 20.56                 | 20.56                 |
| - Four Dimensions Commodities Private Limited  | 31000  | 3.10                  | 3.10                  |
| b) Shares encumbered with the acquirer   | NA   | NA                    | NA                    |
| c) VRs otherwise than by equity shares   | NA   | 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) after acquisition | NA   | NA                    | NA                    |
|  |  | <i>(Refer note 1)</i> | <i>(Refer note 1)</i> |
| <b>Total (a+b+c+d)</b>   | <b>737950</b>  | <b>73.73</b>          | <b>73.73</b>          |
| Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)   | Pursuant to disposal of shares under Buyback of Equity Shares of the Company       |                       |                       |
| Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable   | 07.02.2018   |                       |                       |
| Equity share capital / total voting capital of the TC before the said acquisition/sale   | Rs. 1,03,05,930/- comprising 10,30,593 equity shares of Rs. 10/- per equity share. |                       |                       |
| Equity share capital/ total voting capital of the TC after the said acquisition/sale   | Rs.1,00,09,280/- comprising 10,00,928 equity shares of Rs. 10/- per equity share.  |                       |                       |
| Total diluted share/voting capital of the TC after the said acquisition/sale   | Rs. 2,96,650/- comprising 29,665 equity shares of Rs. 10/- per equity share.       |                       |                       |

**Note 1: This filing is being made on account of disposal of securities through Buyback under tender offer. The Effective Date of the settlement is 07.02.2018. The percentage of total share/voting capital is calculated after taking into consideration the paid up capital of the company post Buyback of Securities.**

**Note:**

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of 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.

**Ashwin Kothari**



**Place: Mumbai**

**Date: 08.02.2018**

**Rohit Kothari**



**Place: Mumbai**

**Date: 08.02.2018**

**Meena Kothari**



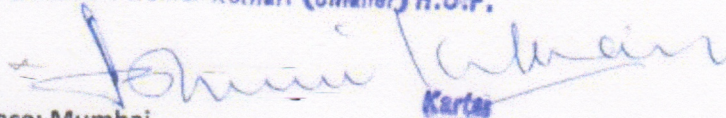
**Place: Mumbai**

**Date: 08.02.2018**



For and behalf Ashwin Kumar Kothari (s) (HUF)

for Ashwin Kumar Kothari (Smaller) H.U.P.

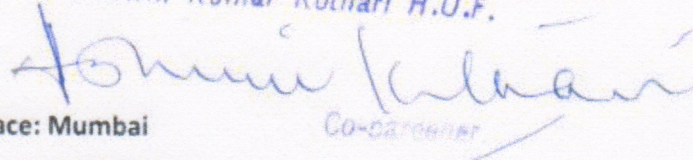
  
Karta

Place: Mumbai

Date: 08.02.2018

For and behalf Ashwin Kumar Kothari (HUF)

for Ashwin Kumar Kothari H.U.F.

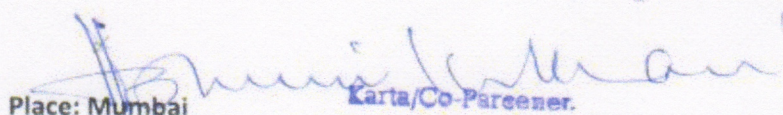
  
CO-PARTNER

Place: Mumbai

Date: 08.02.2018

For and behalf -Pannalal C. Kothari (HUF)

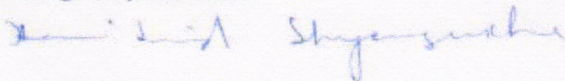
for PANNALAL C. KOTHARI (H.U.F.)

  
Karta/Co-Partner.

Place: Mumbai

Date: 08.02.2018

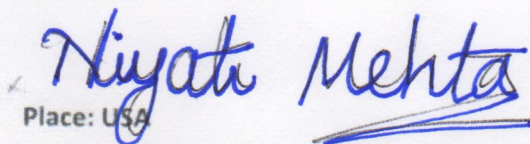
Harisingh Shyamsukha



Place: Mumbai

Date: 08.02.2018

Niyati Mehta



Place: USA

Date: 08.02.2018



For and behalf GeeCee Investments Limited  
**FOR GEECEE INVESTMENTS LTD.**

  
DIRECTOR/AUTHORISED SIGNATORY

Place: Mumbai

Date: 08.02.2018

For and behalf Winro Commercial (India) Limited  
**FOR WINRO COMMERCIAL (INDIA) LTD.**

  
COMPANY SECRETARY

Place: Mumbai

Date: 08.02.2018

For and behalf Sam-Jag-Deep Investments Private Limited  
**FOR SAM-JAG-DEEP INVESTMENTS PVT. LTD**

  
DIRECTOR/AUTHORISED SIGNATORY

Place: Mumbai

Date: 08.02.2018

For and behalf Four Dimensions Securities (India) Limited  
**FOR FOUR DIMENSIONS SECURITIES (INDIA) LTD**

  
DIRECTOR/AUTHORISED SIGNATORY

Place: Mumbai

Date: 08.02.2018

For and behalf Four Dimensions Commodities Private Limited  
**FOR FOUR DIMENSIONS COMMODITIES PVT. LTD.**

  
DIRECTOR/AUTHORISED SIGNATORY

Place: Mumbai

Date: 08.02.2018