

Dated: 20.04.2018

To,
The Manager,
Securities and Exchange Board of India,
Plot No. C-4 A,G,
Bandra Kurla Complex,
Bandra (East) Mumbai.

Subject: Disclosure under Regulation 10(7) – Report to SEBI under regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Dear Sir/Madam,

Please find enclosed herewith, duly signed Disclosure under Regulation 10(7) in respect of acquisitions made in Prime Industries Limited upon exemption provided for in regulation 10(1)(a)(iv) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.


Further please find enclosed herewith the demand draft No.078976 dated 19/04/2018 for Rs. 1,50,000/- (Rupees One Lakh Fifty Thousand) drawn on HDFC Bank, Feroze Gandhi Market Ludhiana, in favour of Securities and Exchange Board of India, Payable at Mumbai, being the payment towards fees required under Regulation 10(7).

The Annexures enclosed with this letter are as follows:

Sr. No.	Annexure No	Particular
1	Annexure-1	Prior Intimation of acquisition under Regulation 10(5)
2	Annexure-2	Acquisition disclosure under Regulation 10(6)
3	Annexure-3	Shareholding Pattern of the Company for the F.Y ended 31.03.2018, 31.03.2017, 31.03.2016 and 31.03.2015.
4	Annexure-4	Disclosure under regulation 29(1) & 29(2) of Takeover Regulations,2011

Request you to please take the same on record and acknowledge.
Thanking You.

Yours faithfully,
For & on behalf of the Acquirers


Rajinder Kumar Singhania
(Acquirer/Promoter)

Encl: as above
CC to
✓ BSE Limited

Format under Regulation 10(7) - Report to SEBI in respect of any acquisition made in reliance upon exemption provided for in regulation 10(1)(a)(iv) of SEBI (SAST) Regulations, 2011

1	General Details	
	a. Name, address, telephone no., e-mail of acquirer(s) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond}	Mr. Rajinder Kumar Singhania R/o #96, Sant Nagar, Civil Lines, Ludhiana Tel. No. 0161-3911500 E-mail: rks@mastertrust.co.in
	b. Whether sender is the acquirer (Y/N)	Yes
	c. If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization)	N.A.
	d. Name, address, Tel no. and e-mail of the sender, if sender is not the acquirer	N.A.
2	Compliance of Regulation 10(7)	
	a. Date of report	20.04.2018
	b. Whether report has been submitted to SEBI within 21 working days from the date of the acquisition	Yes
	c. Whether the report is accompanied with fees as required under Regulation 10(7)	Yes. The applicable fee of Rs. 1,50,000/- (One Lakh Fifty Thousand) is enclosed vide Demand Draft No. 078976, dated 19.04.2018, drawn on HDFC Bank, Feroze Gandhi Market Ludhiana.
3	Compliance of Regulation 10(5)	
	a. Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed, atleast 4 working days before the date of the proposed acquisition	Yes, Copies of the disclosures made under regulation 10(5) are enclosed herewith this report as Annexure-1 .
	b. Date of Report	20.03.2018
4	Compliance of Regulation 10(6)	
	a. Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed within 4 working days after the date of the proposed acquisition	Yes, Copies of the disclosures made under regulation 10(6) are enclosed herewith this report as Annexure-2 .
	b. Date of Report	29.03.2018
5	Details of the Target Company (TC)	
	a. Name & address of TC	PRIME INDUSTRIES LIMITED SCO 19, Master Chambers, Feroze Gandhi Market, Ludhiana-141001
	b. Name of the Stock Exchange(s) where the shares of the TC are listed	BOMBAY STOCK EXCHANGE LTD.



6	Details of the acquisition				
	a. Date of acquisition	28.03.2018			
	b. Acquisition price per share (in Rs.)	Rs. 1.25/- per share			
	c. Regulation which would have been triggered an open offer, had the report not been filed under Regulation 10(7). (whether Regulation 3(1), 3(2), 4 or 5)	Regulation 3(2)			
	d. Shareholding of acquirer(s) and PAC individually in TC (in terms of no. & as a percentage of the total share/voting capital of the TC) (*)	Before the Acquisition		After the Acquisition	
		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
	Name of the acquirer(s)				
	1. Mr. Rajinder Kumar Singhanian	12902	0.16	1695902	21.47
	2. Mrs. Harneesh Kaur Arora	63200	0.80	1328200	16.81
	3. Mr. Harjeet Singh Arora	66951	0.85	66951	0.85
	4. Singhanian Properties	80500	1.02	80500	1.02
	5. Punnet Singhanian	50000	0.63	50000	0.63
	6. Parveen Singhanian	50000	0.63	50000	0.63
	7. Sanawar Investments	50000	0.63	50000	0.63
	8. Chirag Singhanian	50000	0.63	50000	0.63
	9. Jashanjyot Singh Arora	225000	2.85	225000	2.85
	10. M/s Arora Financial Services Limited.	110300	1.40	110300	1.40
	11. M/s Bluecircle Investments	159650	2.02	159650	2.02
	12. M/s Crescent Investments	39900	0.51	39900	0.51
	13. M/s Saintco India Private Limited	500000	6.33	500000	6.33
	e. Shareholding of seller/s in TC (in terms of no. & as a percentage of the total share/ voting capital of the TC)	Before the Acquisition		After the Acquisition	
		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
	Name of the Seller:				
	1. Master Trust Limited	1454800	18.42	54800	0.69
	2. Master Capital Services Limited	1145000	14.49	0.00	0.00
	3. Master Commodity Services Limited	120000	1.52	0.00	0.00
	4. Master Infrastructure and Real Estate Developers Limited	283000	3.58	0.00	0.00
7	Information specific to the exemption category to which the instant acquisition belongs- Regulation 10(1)(a)(iv)				
	a. Provide the names of the seller(s)	1. Master Trust Limited 2. Master Capital Services Limited 3. Master Commodity Services Limited 4. Master Infrastructure and Real Estate Developers Limited			

b. Shareholding of the acquirer and the seller/s in the TC during the three years prior to the proposed acquisition			
c. Shareholding of the acquirer and the seller/s in the TC during the three years prior to the proposed acquisition	As on March 2017 (Year 1)	As on March 2016 (Year 2)	As on March 2015 (Year 3)
Acquirer* (Name of the PAC) 1. Mr. Rajinder Kumar Singhanian 2. Mrs. Harneesh Kaur Arora	12902 66951	12902 66951	12902 66951
Name of the sellers (*) 1. Master Trust Limited 2. Master Capital Services Limited 3. Master Commodity Services Limited 4. Master Infrastructure and Real Estate Developers Limited	1454800 1145000 120000 283000	569800 1145000 120000 283000	569800 1145000 120000 283000
d. Confirm that the acquirer(s) and the seller/s have been named as PAC during the last three years in the shareholding pattern filed by the TC, in terms of the listing agreement or the Takeover Regulations. Provide copies of such filings under the listing agreement or the Takeover Regulations.	Yes, it is confirmed that the acquirer/s and the seller/s have been named as PAC alongwith acquirers during the last three years in the shareholding pattern filed by the TC (Prime industries Limited). Copies of the following Shareholding Pattern(s) filed by Target Company (Prime Industries Limited) are enclosed as Annexure 3: a) For the Year Ended 31.03.2018 (Latest) b) For the Year Ended 31.03.2017 c) For the Year Ended 31.03.2016 d) For the Year Ended 31.03.2015		
d. If shares of the TC are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed	N.A.		
e. If the shares of the TC are infrequently traded, the price of such shares as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Rs. 2.40/- (Fair Price)		
f. Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (d) or (e) above, as applicable.	It is hereby confirm that acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (e) above		
g. Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	20.03.2018		




<p>h. Whether the acquirers as well as sellers have complied with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). If yes, specify applicable regulation(s) as well as date on which the requisite disclosures were made along with the copies of the same.</p>	<p>Yes, Disclosure as required under Regulation 29(2) of SEBI (SAST) Regulations, 2011 were made to BSE on 28.03.2018 and the copies of the same are enclosed herewith this report as Annexure-4.</p>
<p>i. Declaration by the acquirer that all the conditions specified under regulation 10(1)(a)(iv) with respect to exemptions has been duly complied with.</p>	<p>It is hereby declared that all the conditions specified under regulation 10(1)(a)(iv) with respect to exemptions have been duly complied with.</p>

We hereby declare that the information provided in the instant report is true and nothing has been concealed there

For & on behalf of the Acquirers

Date: 20.04.2018
Place: Ludhiana


Rajinder Kumar Singhania
Acquirer/Promoter

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HDFC BANK

AC PAYEE ONLY
NOT NEGOTIABLE

DEMAND DRAFT

PAYABLE AT PAR AT ALL BRANCHES OF HDFC BANK LTD

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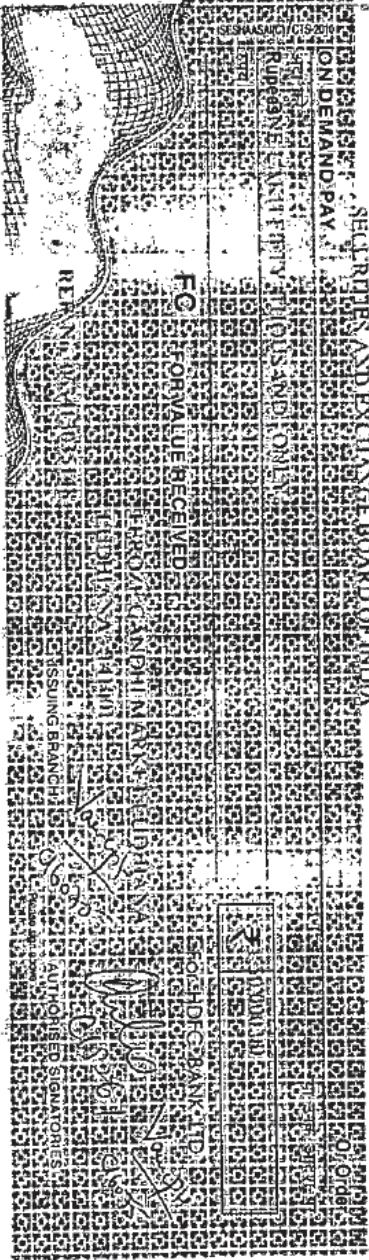
SECURITIES AND EXCHANGE BOARD OF INDIA

REGISTERED
ON DEMAND PAY

RUPEES ONE THOUSAND ONLY

FCI FOR VALUE RECEIVED

REMI



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Annexure-1

Date: 20.03.2018

To,
The Secretary
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street Fort,
Mumbai

Dear Sir,

Subject: Intimation under Regulation 10(5) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

Pursuant to General Exemptions under Regulation 10(5), which necessitates the acquirer along with persons acting in concert, to intimate the acquisition of shares to the Stock exchanges on which the shares of the Target Company are listed, please find enclosed herewith the applicable disclosure of proposed acquisition of 12,65,000 shares of the Prime Industries Limited, representing 16.01 % of the total share capital of the Company.

The above is for your information and record.

Thanking You,
Yours truly,

H. Arora

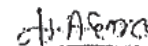
(HARNEESH KAUR ARORA)
ACQUIRER

Format for Disclosures under Regulation 10(5) - Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (SAST) Regulation, 2011

1	Name of the Target Company (TC)	PRIME INDUSTRIES LIMITED			
2	Name of the acquirer(s)	Harneesh Kaur Arora			
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			
4	Details of the proposed acquisition				
	a.	Name of the person(s) from whom shares are to be acquired	Master Commodity Services Limited		
			Master Capital Services Limited		
	b.	Proposed date of acquisition	27-03-2018 or later		
	c.	Number of shares to be acquired from each			
		Master Commodity Services Limited	120000		
		Master Capital Services Limited	1145000		
	d.	Total shares to be acquired as % of share	16.01		
	e.	Price at which shares are proposed to be acquired	Market Price subject to Regulation 8(2)(e)		
	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				
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.				
	NA				
7	If infrequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8:				
	Market Price subject to Regulation 8(2)(e)				
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.				
	Confirmed				
9	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)				
	Confirmed				
10	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.				
	Confirmed				
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) (*)				
1	Harneesh Kaur Arora	63200	0.80	1328200	16.81
b.	Seller (s)				
1	Master Commodity Services Limited	120000	1.52	0	0.00
2	Master Capital Services Limited	1145000	14.49	0	0.00

(*) Shareholding of each entity may be shown, separately and then collectively in a group.

Date: 20-03-2018
Place: Ludhiana


HARNEESH KAUR ARORA
 ACQUIRER

Date: 20-03-2018

To,
The Secretary
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street Fort,
Mumbai

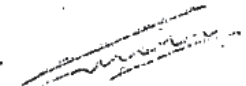
Dear Sir,

Subject: Intimation under Regulation 10(5) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

Pursuant to General Exemptions under Regulation 10(5), which necessitates the acquirer along with persons acting in concert, to intimate the acquisition of shares to the Stock exchanges on which the shares of the Target Company are listed, please find enclosed herewith the applicable disclosure of proposed acquisition of 16,83,000 shares of the Prime Industries Limited, representing 21.30 % of the total share capital of the Company.

The above is for your information and record.

Thanking You,
Yours truly,


(RAJINDER KUMAR SINGHANIA)
ACQUIRER

Format for Disclosures under Regulation 10(5) - Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (SAST) Regulation, 2011

1	Name of the Target Company (TC)	PRIME INDUSTRIES LIMITED			
2	Name of the acquirer(s)	Rajinder Kumar Singhania			
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			
4	Details of the proposed acquisition				
	a.	Name of the person(s) from whom shares are to be acquired	Master Trust Limited		
			Master Infrastructure And Real Estate Developers Limited		
	b.	Proposed date of acquisition	27-03-2018 0% Latex		
	c.	Number of shares to be acquired from each person mentioned in 4(a) above			
	i.	Master Trust Limited	1400000		
	ii.	Master Infrastructure And Real Estate Developers Limited	283000		
	d.	Total shares to be acquired as % of share	21.30		
	e.	Price at which shares are proposed to be	Market Price subject to Regulation 8(2)(e)		
	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		10(1)(a)(iv)		
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.		NA		
7	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.		Market Price subject to Regulation 8(2)(e)		
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.		Confirmed		
9	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter IV of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)		Confirmed		
10	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.		Confirmed		
11.	Shareholding Details				
			Before the proposed transaction	After the proposed transaction	
			No. of shares/ voting rights	No. of shares/ voting rights	% w.r.t. total share capital of TC
a.	Acquirer (s) and PACs (other than sellers) (*)				
	RAJINDER KUMAR SINGHANIA		12902	1695902	21.47
b.	Seller (s)				
1	Master Trust Limited		1454800	54800	0.69
2	Master Infrastructure And Real Estate Developers Limited		283000	0	0

(*): Shareholding of each entity may be shown separately and then collectively in a group.

Date: 20-03-2018
Place: Ludhiana

RAJINDER KUMAR SINGHANIA
ACQUIRER

Date: 29-03-2018

To,
The Secretary
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street Fort,
Mumbai

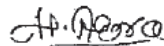
Dear Sir,

Subject: Intimation under Regulation 10(6) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

Pursuant to General Exemptions under Regulation 10(6), which necessitates the acquirer along with persons acting in concert, to file a report to the Stock exchanges on which the shares of the Target Company are listed not later than 4 working days from the acquisition, please find enclosed herewith the applicable disclosure regarding purchase of 12,65,000 shares representing 16.01 % of the total share capital of the Prime Industries Limited.

The above is for your information and record.

Thanking You,
Yours truly,



(HARNEESH KAUR ARORA)
ACQUIRER

Format for Disclosures under Regulation 10(6) -Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (SAST) Regulation, 2011

1	Name of the Target Company (TC)	PRIME INDUSTRIES LIMITED			
2	Name of the acquirer(s)	Harneesh Kaur Arora			
3	Name of the stock exchange where shares of the TC are listed	BOMBAY STOCK EXCHANGE LTD.			
4	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Inter-se Transfer			
5	Relevant regulation under which the acquirer is exempted from making open offer.	10(1)(a)(iv)			
6	Whether disclosure of proposed acquisition was required to be made under regulation 10 (5)	-Yes, Disclosure of proposed acquisition was required to be made under Regulation 10 (5).			
	Whether disclosure was made	-Yes, Disclosure was made.			
	Whether it was made within the timeline specified under the regulations.	-Yes, Disclosure was made within timeline specified under the regulations.			
	Date of filing with the Stock Exchange	20-03-2018			
7	Details of acquisition	Disclosures required to be made under regulation 10(5)	Whether the disclosures under regulation 10(5) are actually made		
	a. Name of the transferor / seller				
	Master Commodity Services Limited	120000	Yes		
	Master Capital Services Limited	1145000	Yes		
	b. Date of acquisition	28-03-2018			
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	1265000			
	d. Total shares proposed to be acquired/ actually acquired as a % of diluted share capital of TC	16.01			
	e. Price at which shares are proposed to be acquired / actually acquired.	Re. 1.25			
8	Shareholding details	Pre-Transaction		Post-Transaction	
		No. of shares held	% w.r.t. total share capital of TC	No. of shares held	% w.r.t. total share capital of TC
	a Each Acquirer / Transferee(*)				
	Harneesh Kaur Arora	63200	0.8	1328200	16.81
	b Each Seller / Transferor				
	Master Commodity Services Limited	120000	1.52	0	0.00
	Master Capital Services Limited	1145000	14.49	0	0.00

(*) Shareholding of each entity may be shown separately and then collectively in a group.

Date: 29-03-2018
Place: Ludhiana

H. Arora
HARNEESH KAUR ARORA
ACQUIRER

Date: 24-03-2018

To,
The Secretary
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street Fort,
Mumbai

Dear Sir,

Subject: Intimation under Regulation 10(6) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

Pursuant to General Exemptions under Regulation 10(6), which necessitates the acquirer along with persons acting in concert, to file a report to the Stock exchanges on which the shares of the Target Company are listed not later than 4 working days from the acquisition, please find enclosed herewith the applicable disclosure regarding purchase of 16,83,000 shares representing 21.30 % of the total share capital of the Prime Industries Limited.

The above is for your information and record.

Thanking You,
Yours truly,


(RAJINDER KUMAR SINGHANIA)
ACQUIRER

Format for Disclosures under Regulation 10(6) -Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (SAST) Regulation, 2011

1	Name of the Target Company (TC)	PRIME INDUSTRIES LIMITED			
2	Name of the acquirer(s)	Rajinder Kumar Singhania			
3	Name of the stock exchange where shares of the TC are listed	BOMBAY STOCK EXCHANGE LTD.			
4	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Inter-se Transfer			
5	Relevant regulation under which the acquirer is exempted from making open offer.	10(1)(a)(iv)			
6	Whether disclosure of proposed acquisition was required to be made under regulation 10 (5)	-Yes, Disclosure of proposed acquisition was required to be made under Regulation 10 (5).			
	Whether disclosure was made	-Yes, Disclosure was made.			
	Whether it was made within the timeline specified under the regulations.	-Yes, Disclosure was made within timeline specified under the regulations.			
	Date of filing with the Stock Exchange	20-03-2018			
7	Details of acquisition	Disclosures required to be	Whether the disclosures		
	a. Name of the transferor / seller				
	Master Infrastructure And Real Estate Developers Limited	283000	Yes		
	Master Trust Limited	1400000	Yes		
	b. Date of acquisition	28-03-2018			
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	1683000			
	d. Total shares proposed to be acquired/ actually acquired as a % of diluted share capital of TC	21.30			
	e. Price at which shares are proposed to be acquired/ actually acquired	Rs. 1.25			
8	Shareholding details	Pre-Transaction		Post-Transaction	
		No. of shares held	% w.r.t. total share capital of TC	No. of shares held	% w.r.t. total share capital of TC
	a Each Acquirer / Transferee(*)				
	Rajinder Kumar Singhania	12902	0.16	1695902	21.47
	b Each Seller / Transferor				
	Master Infrastructure And Real Estate Developers Limited	283000	3.58	0	0.00
	Master Trust Limited	1454800	18.42	54800	0.69

(*) Shareholding of each entity may be shown separately and then collectively in a group.

Date: 24-03-2018
Place: Ludhiana

Rajinder Kumar Singhania
ACQUIRER

Date: 28-03-2018

To,

The Compliance Officer
Prime Industries Limited
SCO-19, Master Chambers
Feroze Gandhi Market,
Ludhiana-141001

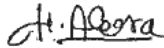
Dear Sir,

Subject: Intimation under Regulation 29(1) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

Pursuant to Regulation 29(1), which necessitates the acquirer along with persons acting in concert, to submit the disclosure of acquisition of shares to the Target Company as well as to the Stock exchanges on which the shares of the Target Company are listed, Please find enclosed herewith the applicable disclosure of purchase of 12,65,000 shares representing 16.01% % of the total share capital of the Company.

The above is for your information and record.

Thanking You,
Yours truly,



(HARNEESH KAUR ARORA)
PROMOTER

CC :

The Secretary
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street Fort,
Mumbai

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)	PRIME INDUSTRIES LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	HARNEESH KAUR ARORA		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited		
Details of the acquisition / disposal 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/disposal under consideration, holding of :			
a) Shares carrying voting rights	63200	0.80%	N.A.
b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/ others)	Nil	Nil	N.A.
c) Voting rights (VR) otherwise than by equity shares	Nil	Nil	N.A.
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	Nil	N.A.
e) Total (a+b+c)	63200	0.80%	N.A.
Details of acquisition/sale			
a) Shares carrying voting rights acquired	1265000	16.01%	N.A.
b) VRs acquired otherwise than by equity shares	N.A.	N.A.	N.A.
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	N.A.	N.A.	N.A.
d) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/ others)	Nil	Nil	N.A.
e) Total (a+b+c+d)	1265000	16.01%	N.A.
After the acquisition/sale, holding of:			
a) Shares carrying voting rights	1328200	16.81%	N.A.
b) VRs otherwise than by equity shares	N.A.	N.A.	N.A.
c) Warrants/convertible securities/any other	N.A.	N.A.	N.A.

HKA Harneesh Kaur Arora

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)	Nil	Nil	N.A.
e) Total (a+b+c+d)	1328200	16.81%	N.A.
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	OFF MARKET		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	N.A.		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable.	28-03-2018		
Equity share capital / total voting capital of the TC before the said acquisition/sale	7900000		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	7900000		
Total diluted share/voting capital of the TC after the said acquisition/sale	N.A.		

Part-B

Name of the Target company : PRIME INDUSTRIES LIMITED

Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Whether the acquirer belongs to Promoter / Promoter group	PAN of the acquirer and / or PACs
HARNEESH Kaur ARORA	PROMOTER	ACJPA6923B
HARJEET SINGH ARORA		AAMPA0474C
RAJINDER KUMAR SINGHANIA		ABRPS7928R
MASTER TRUST LIMITED		AABCM5833B
MASTER CAPITAL SERVICES LIMITED		AABCM1406A
MASTER COMMODITY SERVICES LIMITED		AAACE3600M
ARORA FINANCIAL SERVICES LIMITED		AABCA3949G
SAINTCO INDIA PRIVATE LIMITED		AAACS0172Q

H.K.A.
H. Arora

BLUECIRCLE INVESTMENTS	AAACB6014E
CRESCENT INVESTMENTS	AAACC6140J
SANAWAR INVESTMENTS	AACCS0280M
SINGHANIA PROPERTIES	AABCS8959G
MASTER INFRASTRUCTURE AND REAL ESTATE DEVELOPERS LIMITED	AAACP9740P
JASHNAJYOT SINGH ARORA	AUPPS9752A
PUNEET SINGHANIA	AROPS8175R
CHIRAG SINGHANIA	AYVPS7672K
PARVEEN SINGHANIA	ABRPS7929Q

H. Arora
(HARNEESH KAUR ARORA)
ACQUIRER

Place: Ludhiana

Date: 28-03-2018

Date: 28-03-2018

To,

The Compliance Officer
Prime Industries Limited
SCO-19, Master Chambers
Feroze Gandhi Market,
Ludhiana-141001

Dear Sir,

Subject: Intimation under Regulation 29(1) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

Pursuant to Regulation 29(1), which necessitates the acquirer along with persons acting in concert, to submit the disclosure of acquisition of shares to the Target Company as well as to the Stock exchanges on which the shares of the Target Company are listed, Please find enclosed herewith the applicable disclosure of purchase of 16,83,000 shares representing 21.30% of the total share capital of the Company.

The above is for your information and record.

Thanking You,
Yours truly,


(RAJINDER KUMAR SINGHANIA)
PROMOTER / ACQUIRER

CC :

The Secretary
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street Fort,
Mumbai

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)	PRIME INDUSTRIES LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	RAJINDER KUMAR SINGHANIA		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited		
Details of the acquisition / disposal 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/disposal under consideration, holding of :			
f) Shares carrying voting rights	12902	0.16%	N.A.
g) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	Nil	Nil	N.A.
h) Voting rights (VR) otherwise than by equity shares	Nil	Nil	N.A.
i) 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	Nil	N.A.
j) Total (a+b+c)	12902	0.16%	N.A.
Details of acquisition/sale			
f) Shares carrying voting rights acquired	1683000	21.30%	N.A.
g) VRs acquired otherwise than by equity shares	N.A.	N.A.	N.A.
h) 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	N.A.	N.A.	N.A.
i) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	Nil	Nil	N.A.
j) Total (a+b+c+d)	1683000	21.30%	N.A.
After the acquisition/sale, holding of:			
f) Shares carrying voting rights	1695902	21.47%	N.A.
g) VRs otherwise than by equity shares	N.A.	N.A.	N.A.
h) Warrants/convertible securities/any other	N.A.	N.A.	N.A.



instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition			
i) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	Nil	Nil	N.A.
j) Total (a+b+c+d)	1695902	21.47%	N.A.
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	OFF MARKET		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	N.A.		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	28-03-2018		
Equity share capital / total voting capital of the TC before the said acquisition/sale	7900000		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	7900000		
Total diluted share/voting capital of the TC after the said acquisition/sale	N.A.		

Part-B

Name of the Target company : PRIME INDUSTRIES LIMITED

Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Whether the acquirer belongs to Promoter / Promoter group	PAN of the acquirer and / or PACs
RAJINDER KUMAR SINGHANIA	PROMOTER	ABRPS7928R
HARJEET SINGH ARORA		AAMPA0474C
HARNEESH KAUR ARORA		ACIPA6923B
MASTER TRUST LIMITED		AABCM5833B
MASTER CAPITAL SERVICES LIMITED		AABCM1406A
MASTER COMMODITY SERVICES LIMITED		AAACE3600M
ARORA FINANCIAL SERVICES LIMITED		AABCA3949G
SAINTCO INDIA PRIVATE LIMITED		AAACS0172Q

BLUECIRCLE INVESTMENTS		AAACB6014E
CRESCENT INVESTMENTS		AAACC6140J
SANAWAR INVESTMENTS		AACCS0280M
SINGHANIA PROPERTIES		AABCS8959G
MASTER INFRASTRUCTURE AND REAL ESTATE DEVELOPERS LIMITED		AAACP9740P
JASHNAJYOT SINGH ARORA		AUPPS9752A
PUNEET SINGHANIA		AROPS8175R
CHIRAG SINGHANIA		AYVPS7672K
PARVEEN SINGHANIA		ABRPS7929Q


(RAJINDER KUMAR SINGHANIA)
ACQUIRER

Place: Ludhiana
Date: 28-03-2018


mastertrust™
IN MASTER I TRUST



Date: 28-03-2018

To,

The Compliance Officer
Prime Industries Limited
SCO-19, Master Chambers
Feroze Gandhi Market,
Ludhiana-141001

Dear Sir,


Subject: Intimation under Regulation 29(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

Pursuant to Regulation 29(2), which necessitates any person along with persons acting in concert, to submit the disclosure of change in shareholding of more than 2% to the Target Company as well as to the Stock exchanges on which the shares of the Target Company are listed, Please find enclosed herewith the applicable disclosure of sale of 11,45,000 shares representing 14.49 % of the total share capital of the Company.

The above is for your information and record.

Thanking You,
Yours truly,

For and on behalf of Seller
For Master Capital Services Limited


(Harjeet Singh Arora)
Managing Director

Place: Ludhiana
Date: 28-03-2018

CC:

The Secretary
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street Fort,
Mumbai

MASTER CAPITAL SERVICES LIMITED

Master Chambers, S.C.O 19, Feroze Gandhi Market, Ludhiana -141 001 | Tel : +91-161-3911500 | Fax: +91-161-2402963
Member: National Stock Exchange of India Ltd. SEBI Reg. No. : INBINF/INE230643634 | Bombay Stock Exchange Ltd. SEBI Regn. No. INBINF010843894, INE010543837
Regd. Office : C-1, 16/20, Jeevan Jyoti Building, Cavasji Patel Street, Fort, Mumbai - 400001 | Tel : 022-4344554 Unique Identification No. (UNI) : 400014100
E-mail : secretary@mastertrust.co.in

www.mastertrust.co.in


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

Name of the Target Company (TC)	PRIME INDUSTRIES LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	MASTER CAPITAL SERVICES LIMITED		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited		
Details of the acquisition / disposal 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/disposal under consideration, holding of :			
a) Shares carrying voting rights	1145000	14.49%	N.A.
b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	Nil	Nil	N.A.
c) Voting rights (VR) otherwise than by equity shares	Nil	Nil	N.A.
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	Nil	N.A.
e) Total (a+b+c)	1145000	14.49%	N.A.
Details of acquisition/sale			
a) Shares carrying voting rights acquired	1145000	14.49%	N.A.
b) VRs acquired otherwise than by equity shares	N.A.	N.A.	N.A.
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	N.A.	N.A.	N.A.
d) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	Nil	Nil	N.A.
e) Total (a+b+c+d)	1145000	14.49%	N.A.
After the acquisition/sale, holding of:			
a) Shares carrying voting rights	0	0%	N.A.

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b) VRs otherwise than by equity shares	N.A.	N.A.	N.A.
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	N.A.	N.A.	N.A.
d) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	Nil	Nil	N.A.
e) Total (a+b+c+d)	0	0%	N.A.
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	OFF MARKET		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	N.A.		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	28-03-2018		
Equity share capital / total voting capital of the TC before the said acquisition/sale	7900000		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	7900000		
Total diluted share/voting capital of the TC after the said acquisition/sale	N.A.		

Signature of Seller
For Master Capital Services Limited


(Harjeet Singh Arora)
Managing Director

Place: Ludhiana
Date: 28-03-2018


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IN MASTER I TRUST

Date: 28-03-2018

To,

The Compliance Officer
Prime Industries Limited
SCO-19, Master Chambers
Feroze Gandhi Market,
Ludhiana-141001

Dear Sir,


Subject: Intimation under Regulation 29(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

Pursuant to Regulation 29(2), which necessitates any person along with persons acting in concert, to submit the disclosure of change in shareholding of more than 2% to the Target Company as well as to the Stock exchanges on which the shares of the Target Company are listed, Please find enclosed herewith the applicable disclosure of sale of 14,00,000 shares representing 17.72 % of the total share capital of the Company.

The above is for your information and record.

Thanking You,
Yours truly,

For and on behalf of Seller
For Master Trust Limited


(Harjeet Singh Arora)
Managing Director

Place: Ludhiana
Date: 28-03-2018

CC :

The Secretary
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street Fort,
Mumbai

MASTER TRUST LIMITED

CIN : L65991PB1985PLC006414
Regd. Office : Master Chambers, S.C.O. 19, Feroze Gandhi Market, Ludhiana -141 001 | Tel : +91-161-3911500 | Fax : +91-161-2402963
Corporate Office : 1012, 10th Floor, Arunachal Building, 19, Barakhamba Road, New Delhi - 110001 | Tel : +91-11-42111000 | Fax : +91-11-42111040
E-mail : secretarial@mastertrust.co.in

www.mastertrust.co.in


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

Name of the Target Company (TC)	PRIME INDUSTRIES LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	MASTER TRUST LIMITED		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited		
Details of the acquisition / disposal 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/disposal under consideration, holding of :			
f) Shares carrying voting rights	1454800	18.42%	N.A.
g) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	Nil	Nil	N.A.
h) Voting rights (VR) otherwise than by equity shares	Nil	Nil	N.A.
i) 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	Nil	N.A.
j) Total (a+b+c)	1454800	18.42%	N.A.
Details of acquisition/sale			
f) Shares carrying voting rights acquired	1400000	17.72%	N.A.
g) VRs acquired otherwise than by equity shares	N.A.	N.A.	N.A.
h) 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	N.A.	N.A.	N.A.
i) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	Nil	Nil	N.A.
j) Total (a+b+c+d)	1400000	17.72%	N.A.
After the acquisition/sale, holding of:			
f) Shares carrying voting rights	54800	0.69%	N.A.

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g) VRs otherwise than by equity shares	N.A.	N.A.	N.A.
h) 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	N.A.	N.A.	N.A.
i) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	Nil	Nil	N.A.
j) Total (a+b+c+d)	54800	0.69%	N.A.
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	OFF MARKET		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	N.A.		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	28-03-2018		
Equity share capital / total voting capital of the TC before the said acquisition/sale	7900000		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	7900000		
Total diluted share/voting capital of the TC after the said acquisition/sale	N.A.		

Signature of Seller
For Master Capital Services Limited


(Harjeet Singh Arora)
Managing Director

Place: Ludhiana
Date: 28-03-2018