

DEVANG KUMAR

Date: 16th August, 2018

To,
Securities and Exchange Board of India
SEBI Bhavan, Plot No. C4-A, G Block,
Bandra Kurla Complex, Bandra (East)
Mumbai-400051

Dear Sirs,

Sub: Report under Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011

This is to inform you that Mrs. Ritika Kumar, being a part of the Promoter Group of Indo Rama Synthetics (India) Limited ("Company"), transferred 4,14,796 Equity shares of Rs. 10/- each of the Company by way of Gift to me, being son and thus immediate relative of Mrs. Ritika Kumar.

This being an inter-se transfer of shares amongst the immediate relative, the same falls within the exemption under Regulation 10(1)(a)(i) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011. Consequent to the above acquisition, I will be the part of the Promoter Group and my shareholding in the Company will be 0.27% and shareholding of my mother Mrs. Ritika Kumar will be NIL.

The aggregate shareholding of Promoter/ Promoter Group before and after the above inter-se transaction remains the same.

In this connection, the Report under Regulation 10(7) along with Demand Draft bearing No. 022222 dated 16th August, 2018 towards the prescribed fee of Rs. 1, 50, 000/- (Rupees One Lakh Fifty Thousand Only) in favour of the Securities of Exchange Board of India, payable at Mumbai drawn on HDFC Bank for the above said acquisition in the prescribed format is enclosed herewith for your kind information and record.

Thanking you,

Yours faithfully



Devang Kumar
(Acquirer)

Cc: 1. Indorama Synthetics (India) Limited

2. BSE Limited

New Trading Ring, Rotunda Building
P.J. Tower, Dalal Street, Fort,
Mumbai- 400 001

3. NSE Limited

Exchange Plaza, 5th Floor
Bandra Kurla Complex,
Bandra (E),
Mumbai- 400 051

Encl: As above

Format under Regulation 10 (7) – Report to SEBI in respect of any acquisition made in reliance up on exemption provided for in regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011

1. General Details		
a.	Name, address, telephone no., e-mail of the acquirer (s) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond.}	Name: Devang Kumar Address: 11, Ballygunge Park Road, Kolkata-700019 Email Id: devangkumar@wearitgroup.com Phone No.: 9836362222
b.	Whether sender is the acquirer(Y/N)	Yes
c.	If not, whether sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization)	Not Applicable
d.	Name, address, Tel no. and e-mail of the sender, if sender is not the acquirer.	Not Applicable
2. Compliance of Regulation 10(7)		
a.	Date of report	16.08.2018
b.	Whether report has been submitted to SEBI within 21 working days from date of acquisition	Yes, Report has been submitted within 21 working days from the date of acquisition.
c.	Whether the report is accompanied with fees as required under Regulation 10(7)	Yes, The applicable fees of Rs. 1,50,000/- (Rupees One Lakh Fifty Thousand Only) is enclosed vide Demand Draft No. 022222 dated 16 th August, 2018 drawn on HDFC Bank.
3. Compliance on Regulation 10(5)		
a.	Whether report has been filed with the Stock Exchange where the shares of the Company are listed, atleast 4 working days before the date of proposed acquisition.	Yes, intimation was sent 4 working days prior to the date of acquisition under Regulation 10(5).
b.	Date of Report	16.07.2018
4. Compliance on Regulation 10(6)		
a.	Whether report has been filed with the Stock Exchange where the shares of the Company are listed, atleast 4 working days before the date of proposed acquisition.	Yes, intimation was sent 4 working days prior to the date of acquisition under Regulation 10(6).
b.	Date of Report	23.07.2018
5. Details of the Target Company (TC)		
a.	Name and address of TC	Indo Rama Synthetics (India) Limited 31-A, MIDC Industrial Area, Butibori, Maharashtra-441122
b.	Name of the Stock Exchange(s) where the shares of the Company is being listed	BSE Limited & NSE Limited
6. Details of Acquisition		
a.	Date of Acquisition	23.07.2018
b.	Acquisition price per share (in Rs.)	NIL- The said transfer was by way of Gift and hence no consideration was paid.
c.	Regulation which would have been triggered off, had the report not been filed under Regulation 10(7). (Whether Regulation 3(1), 3(2), 4 or 5)	Regulation 3(1)
d.	Shareholding of acquirer/s and PACs individually in TC (in terms of no. & as a percentage of the total	Before the Acquisition After the Acquisition

	share/voting capital of the TC)(*)	No. of Shares	% w.r.t. total share capital of TC	No. of Shares	% w.r.t. total share capital of TC
	Name of the Acquirer/s / PACs- Devang Kumar	NIL Annexure-I	NIL Annexure-I	4,14,796 Annexure-I	0.27% Annexure-I
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	% w.r.t. total share capital of TC	No. of Shares	% w.r.t. total share capital of TC
	Name of the Seller- Mrs. Ritika Kumar(Mother)	4,14,796	0.27%	NIL	NIL
7. Information specific to the exemption category to which the instant acquisition belongs Regulation 10(1)(a)(i)					
a.	Provide the names of the seller/s	Mrs. Ritika Kumar			
b.	Specify the relationship between the acquirer/s and the seller/s.	I, Devang Kumar (Acquirer) son of Mrs. Ritika Kumar (seller) forms the part of Promoter Group.			
c.	Confirm whether the acquirer/s and the seller/s are 'immediate relatives' as defined in the Regulation 2(1)	Yes, Mr. Devang Kumar is the son of Mrs. Ritika Kumar and hence are immediate relatives as defined in Regulation 2(1)			
d.	If the shares are frequently traded, volume weighted average market price (VMAP) for a period of sixty trading days preceeding the date of issuance of notice regarding the proposed acquisition to the stock exchange where the TC is listed.	Rs. 26.48/-. However the shares are transferred by way of Gift, Hence no consideration was paid.			
e.	If infrequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of Regulation 8.	Not Applicable			
f.	Confirm where 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.	Not Applicable. Since the shares are transferred by way of gift without any consideration.			
g.	Date of issuance of notice regarding the proposed acquisition to the Stock Exchanges where the TC is listed.	12.07.2018			
h.	1) Whether the acquirer/s as well as seller/s have complied (during 3years prior to the date of acquisition) with the provisions of Chapter V Takeover regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N) 2) If Yes, specify applicable regulation(s) as well as date on which the requisite disclosures were made along with the copies of the same.	Yes Copies of filling disclosure under Regulation 30(2) by the Promoter (Seller) as on 31.03.2016, 31.03.2017, 31.03.2018 are attached – Annexure -II			
i.	Declaration by the acquirer that all the conditions specified under Regulation 10(1)(a)(i) with respect to the exemptions has been duly complied with.	I hereby declare that all the conditions specified under regulation 10(1)(a)(i) with respect to exemptions has been duly complied with.			

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



DEVANG KUMAR

Date: 16th August, 2018
Place: Kolkata

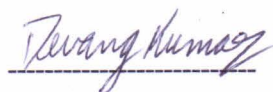
Note:

(*) In case, percentage of shareholding to the total capital is different from percentage of voting rights, indicate percentage of shareholding and voting rights separately. The following abbreviations have been used att through the document: TC stands for 'Target Company', 'Takeover Regulation' stands for SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011.

Annexure-I

Item 6(d) & (e)

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	Acquirer				
	Devang Kumar	NIL	NIL	4,14,796	0.27
	Total (A)	NIL	NIL	4,14,796	0.27
B	Seller/ Transferor				
	Ritika Kumar	4,14,796	0.27	NIL	NIL
	Total (B)	4,14,796	0.27	NIL	NIL
C	Others forming part of Promoter/ Promoter Group/ PAC				
1.	Brookgrange Investments Limited	5,35,64,057	35.28	5,35,64,057	35.28
2.	Mr. Om Prakash Lohia	3,79,84,000	25.02	3,79,84,000	25.02
3.	Mrs. Urmila Lohia	1,81,84,518	11.98	1,81,84,518	11.98
4.	Mr. Alope Lohia	99,200	0.07	99,200	0.07
5.	Mr. Vishal Lohia	11,37,896	0.75	11,37,896	0.75
6.	Ms. Aradhna Lohia	3,13,256	0.21	3,13,256	0.21
7.	Mr. Rimple Lohia	2,39,940	0.16	2,39,940	0.16
8.	Mr. Yashovardhan Lohia	2,49,888	0.16	2,49,888	0.16
	Total (C)	11,17,72,755	73.62	11,17,72,755	73.62



DEVANG KUMAR

SESHANSI(C)/CTS-2010

ON DEMAND PAY *SECURITIES AND EXCHANGE BOARD OF INDIA*****

Or Order

अदा करे

या उनके आदेश पर

Rupees

रुपये

ONE LAKH FIFTY THOUSAND ONLY.

₹

1,50,000.00

For HDFC BANK LTD.

[Signature] B12161

FC FOR VALUE RECEIVED

U N BRAHMACHARI STREET

KOLKATA - 700017

ISSUING BRANCH

REF. No. 010513030470

[Signature]

AUTHORISED SIGNATORIES

Please sign above

⑈022222⑈ 700240009⑈ 999990⑈ 16

PI.U.E

OM PRAKASH LOHIA

R-69, Greater Kailash-I
New Delhi-110048
Tel. : 26484113, 26485905
Fax : 91-11-26489224

2nd April 2018

National Stock Exchange of India Ltd.
Exchange Plaza, 5th Floor,
Bandra - Kurla Complex,
Bandra (E)
Mumbai - 400 051.

BSE Limited
Floor 25, P. J. Towers,
Dalal Street,
Mumbai - 400001.

Sub.: Disclosure under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 for the Financial Year ended 31st March 2018

Dear Sir,

I am pleased to enclose the disclosure under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of shares & Takeovers) Regulations, 2011 for the financial year ended 31st March 2018 and would request you to kindly take the same on record.

Thanking you.

Yours Sincerely,



O. P. Lohia

CC: Indo Rama Synthetics (India) Limited
A-31, MIDC Industrial Area,
Butibori, Nagpur-441122,
Maharashtra

**Disclosures under Regulation 30(1) and 30(2) of SEBI
(Substantial Acquisition of Shares & Takeovers) Regulations, 2011**

PART-A : DETAILS OF SHAREHOLDING

1	Name of the Target Company (TC)	INDO RAMA SYNTHETICS (INDIA) LIMITED		
2	Name(s) of the Stock Exchange(s) where the shares of TC are listed	i) BSE Limited (BSE) ii) National Stock Exchange of India Ltd. (NSE)		
3	Particulars of the Shareholder(s) : (a) Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC. OR (b) Name(s) of Promoter(s), member of the Promoter Group and PAC with him.	1) Mr. O. P. Lohia 2) Mr. Vishal Lohia 3) Mrs. Urmila Lohia 4) Mr. A. Lohia 5) Mrs. Ritika Kumar 6) Ms. Aradhana Lohia 7) Mrs. Rimple Lohia 8) Mr. Yashovardhan Lohia 9) M/s Brookgrange Investments Limited		
4	Particulars of the shareholding of person(s) mentioned at (3) above.	Number of shares	% w.r.t. total share/voting capital wherever applicable	% total diluted share/voting capital of the TC(*)
	As of March 31 st of the year, holding of:			
	a) Shares	112187551	73.89	73.89
	b) Voting Rights (otherwise than by shares)	-		
	c) Warrants	-		
	d) Convertible Securities	-		
	e) Any other instrument that would entitle the holder to receive shares in the TC	-		
	Total	112187551	73.89	73.89

PART-B**

Name of the Target Company : INDO RAMA SYNTHETICS (INDIA) LIMITED

Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter / Promoter Group	PAN of the Person and PACs
1) Mr. O. P. Lohia	Promoter	AACPL0089N
2) Mr. Vishal Lohia	Promoter	AABPL5213F
3) Mrs. Urmila Lohia	Promoter Group	AACPL7659L
4) Mr. A. Lohia	Promoter Group	AACPL7518E
5) Mrs. Ritika Kumar	Promoter Group	AAJPK3890K
6) Ms. Aradhana Lohia	Promoter Group	ACPPL7525A
7) Mrs. Rimple Lohia	Promoter Group	ACNPL3858N
8) Mr. Yashovardhan Lohia	Promoter Group	ACPPL7526D
9) M/s Brookgrange Investments Limited	Promoter Group	AAECB7229B

Place: Gurugram

Date : 2nd April 2018


O. P. Lohia
(Signature of the Authorised Signatory)

Note:

1. In case of Promoter(s) making disclosure under Regulation 30(2), no additional disclosure under Regulation 30(1) is required.

(*) 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.

(**) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.

4th April 2017

National Stock Exchange of India Ltd.
Exchange Plaza, 5th Floor,
Bandra - Kurla Complex,
Bandra (E)
Mumbai - 400 051.

BSE Limited
Floor 25, P. J. Towers,
Dalal Street,
Mumbai - 400001.

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Maharashtra

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4	Particulars of the shareholding of person(s) mentioned at (3) above.	Number of shares	% w.r.t. total share/ voting capital wherever applicable	% total diluted share/voting capital of the TC(*)
	As of March 31 st of the year, holding of:			
	a) Shares	109119551	71.87	71.87
	b) Voting Rights (otherwise than by shares)	-		
	c) Warrants	-		
	d) Convertible Securities	-		
	e) Any other instrument that would entitle the holder to receive shares in the TC	-		
	Total	109119551	71.87	71.87

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3) Mrs. Urmila Lohia	Promoter Group	AACPL7659L
4) Mr. A. Lohia	Promoter Group	AACPL7518E
5) Mrs. Ritika Kumar	Promoter Group	AAJPK3890K
6) Ms. Aradhana Lohia	Promoter Group	ACPPL7525A
7) Mrs. Rimple Lohia	Promoter Group	ACNPL3858N
8) Mr. Yashovardhan Lohia	Promoter Group	ACPPL7526D
9) M/s Brookgrange Investments Limited	Promoter Group	AAECB7229B

Place: Gurgaon

Date : 4th April 2017


O. P. Lohia
(Signature of the Authorised Signatory)

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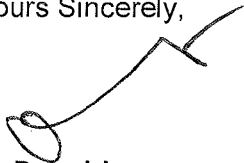
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4	Particulars of the shareholding of person(s) mentioned at (3) above.	Number of shares	% w.r.t. total share/ voting capital wherever applicable	% total diluted share/voting capital of the TC(*)
	As of March 31st of the year, holding of:			
	a) Shares	101911551	67.13	67.13
	b) Voting Rights (otherwise than by shares)	-		
	c) Warrants	-		
	d) Convertible Securities	-		
	e) Any other instrument that would entitle the holder to receive shares in the TC	-		
	Total	101911551	67.13	67.13

PART-B**

Name of the Target Company : INDO RAMA SYNTHETICS (INDIA) LIMITED

Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter / Promoter Group	PAN of the Person and PACs
1) Mr. O. P. Lohia	Promoter	AACPL0089N
2) Mr. M. L. Lohia	Promoter	AHWPL9486C
3) Mr. Vishal Lohia	Promoter	AABPL5213F
4) Mrs. Urmila Lohia	Promoter Group	AACPL7659L
5) Mr. A. Lohia	Promoter Group	AACPL7518E
6) Mrs. Ritika Kumar	Promoter Group	AAJPK3890K
7) Ms. Aradhana Lohia	Promoter Group	ACPPL7525A
8) Mrs. Rimple Lohia	Promoter Group	ACNPL3858N
9) Mr. Yashovardhan Lohia	Promoter Group	ACPPL7526D
10) M/s Brookgrange Investments Limited	Promoter Group	AAECB7229B

Place: Gurgaon

Date : 4 April 2016


O. P. Lohia
(Signature of the Authorised Signatory)

Note:

1. In case of Promoter(s) making disclosure under Regulation 30(2), no additional disclosure under Regulation 30(1) is required.

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