



UNIT-I



UNIT-II

**Bharat
RASAYAN LIMITED**

Regd. Off. : 1501, Vikram Tower, Rajendra Place, New Delhi - 110008
Ph. : +91-11-43661111 (30 lines) • Fax : +91-11-43661100, 41538600
E-mail : info@bharatgroup.co.in • Website : www.bharatgroup.co.in
CIN : L24119DL1989PLC036264

Date: 24.12.2019

To
Listing Department
National Stock Exchange of India Limited
Mumbai – 400001
Trading Symbol: "BHARATRAS"

**Sub: Disclosure for Intimation received from Centum Finance Limited for
acquisition of Equity Shares of the Company**

Dear Sir,

We have received intimation from Centum Finance Limited, pursuant to Regulation 7(2) of the SEBI (Prohibition of Insider Trading), Regulations, 2015 and Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 regarding acquisition of 30,900 no. of equity shares comprising of 0.7273% of the paid up share capital of the Company.

After the said acquisition the total shareholding of Centum Finance Limited is 1,31,900 equity shares comprising of 3.1045% of the paid up share capital of the Company.

In this regard we are submitting herewith the disclosure received from Centum Finance Limited, pursuant to Regulation 7(2) of the SEBI (Prohibition of Insider Trading), Regulations, 2015 and Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.

This is for your information and record.

Kindly acknowledge the same.

Thanking You,

Yours sincerely,
For BHARAT RASAYAN LIMITED



Nikita Chadha
Company Secretary and Compliance Officer

Date: 24.12.2019

To
Listing Department
National Stock Exchange of India Limited
Mumbai – 400001.
Trading Symbol: "BHARATRAS"

To
Company Secretary
Bharat Rasayan Limited
1501, Vikram Tower,
Rajendra Place,
New Delhi – 110008.

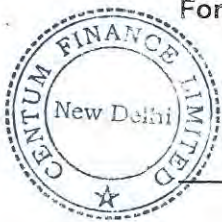
Sub.: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Share and Takeover) Regulations, 2011

Dear Sir/ Madam,

With reference to the abovementioned subject, please find enclosed herewith the disclosure as per Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Share and Takeover) Regulations, 2011, I, Vikas Gupta, Director of Centum Finance Limited, having its registered office at 1307, Vikram Tower, Rajendra Place, New Delhi – 110008, hereby confirm that M/s. Centum Finance Limited falls under the category of Promoters and Promoters Group of Bharat Rasayan Limited (The Company), and also submit the disclosure with regard to proposed acquisition of 30,900 Equity Shares of Bharat Rasayan Limited as inter-se transfer of shares through an On market transaction, duly signed for your information and record.

Thanking You,
Yours sincerely,

For CENTUM FINANCE LIMITED



Vikas Gupta
Acquirer
Promoter Group

Enclosed: Disclosure

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

Name of the Target Company (TC)	Bharat Rasayan Limited NSE Trading Symbol: "BHARATRAS"		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Centum Finance Limited		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	National Stock Exchange of India Limited		
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 of shares by inter-se transfer of shares i.e. inter-se transfer amongst Promoters through an On Market transaction:			
a) Shares carrying voting rights	1,01,000	2.3772%	2.3772%
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)	-	-	-
Total (a+b+c+d)	1,01,000	2.3772%	2.3772%
Details of acquisition			
a) Shares carrying voting rights acquired	30,900	0.7273%	0.7273%
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) acquired	-	-	-

For Centum Finance Limited


Director

d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
Total (a+b+c+d)	30,900	0.7273%	0.7273%
After the acquisition, holding of Acquirer along with PACs of:			
a) Shares carrying voting rights	1,31,900	3.1045%	3.1045%
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)	-	-	-
Total (a+b+c+d)	1,31,900	3.1045%	3.1045%
Mode of acquisition (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	INTER SE TRANSFER AMONGST PROMOTERS AND PROMOTERS GROUP THROUGH AN ON MARKET TRANSACTION		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares	Not Applicable		
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.	23.12.2019		
Equity share capital/ total voting capital of the TC before the said acquisition	42,48,740 Equity Shares of ₹10/- each		
Equity share capital/ total voting capital of the TC after the said acquisition	42,48,740 Equity Shares of ₹10/- each		
Total diluted share/voting capital of the TC after the said acquisition	42,48,740 Equity Shares of ₹10/- each		

Date: 24.12.2019

Place: New Delhi

For CENTUM FINANCE LIMITED



Vikas Gupta
Acquirer
Promoter Group

Part-B

Name of the Target Company: Bharat Rasayan Limited

Name(s) of the acquirer and Persons Acting in Concern (PAC) with the acquirer	Whether the acquirer belongs to Promoter/ Promoter group	PAN of the acquirer and/ or PACs
Centum Finance Limited	Yes	AACCC9070D

Date: 24.12.2019

Place: New Delhi



For CENTUM FINANCE LIMITED

A handwritten signature in blue ink, appearing to read "Vikas Gupta", written over a horizontal line.

**Vikas Gupta
Acquirer
Promoter Group**

Date: 24.12.2019

To
Listing Department
National Stock Exchange of India Limited
Mumbai – 400001.
Trading Symbol: “BHARATRAS”

Sub: Disclosure under Regulation 10(6) of SEBI (Substantial Acquisition of Share and Takeover) Regulation, 2011

Dear Sir,

In terms of disclosure under Regulation 10(6) of SEBI (Substantial Acquisition of Share and Takeover) Regulation, 2011, I, Vikas Gupta, Director of Centum Finance Limited, having its registered office at 1307, Vikram Tower, Rajendra Place, New Delhi – 110008, hereby confirm that M/s. Centum Finance Limited falls under the category of Promoters and Promoters Group of Bharat Rasayan Limited (The Company), and also submit the disclosure with regard to acquisition of 30,900 equity shares of Bharat Rasayan Limited as inter-se transfer of shares, through an On market transaction, duly signed for your information and record.

Thanking You,
Yours sincerely,
For CENTUM FINANCE LIMITED



Vikas Gupta
Acquirer
Promoter Group

CC: - Company Secretary and Compliance Officer
Bharat Rasayan Limited
1501, Vikram Tower,
Rajendra Place,
New Delhi – 110008.

Disclosure 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	Bharat Rasayan Limited NSE Trading Symbol: "BHARATRAS"	
2.	Name of the acquirer(s)	Rajender Prasad Gupta	
3.	Name of the stock exchange where shares of the TC are listed	National Stock Exchange of India Limited	
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Inter-se transfer of 30,900 Equity Shares of Bharat Rasayan Limited between Promoters and Promoters Group. Standing in the name of: Shri Sat Narain Gupta – 17000 shares Smt Savita Gupta – 7700 shares Smt Manju Gupta – 3100 shares Mr. Sahil Gupta – 3100 shares, To Centum Finance Limited – 30,900 shares @ ₹6,325/- per share	
5.	Relevant regulation under which the acquirer is exempted from making open offer.	Regulation 10(1)(a)(ii) of SEBI (SAST) Regulations, 2011	
6.	Whether disclosure of proposed acquisition was required to be made under Regulation 10(5) and if so, - Whether disclosure was made and whether it was made within the timeline specified under the regulations. - Date of filing with the stock exchange	The disclosure of proposed acquisition was required to be made under Regulation 10(5). Yes, declaration under Regulation 10(5) was made within the stipulated time specified under the SEBI (SAST) Regulations. 16.12.2019	
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	Shri Sat Narain Gupta Smt. Savita Gupta Smt. Manju Gupta Mr. Sahil Gupta	Yes
	b. Date of Proposed acquisition	23.12.2019	
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	30,900 Equity Shares (0.7273%)	
	d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	30,900 Equity Shares (0.7273%)	
	e. Price at which shares are proposed to be acquired / actually acquired	On Market (At prevailing market price)	

For Centum Finance Limited


Director

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	1,01,000	2.3772%	1,31,900	3.1045%
b.	Each Seller (s)				
	Shri Sat Narain Gupta	10,28,631	24.2102%	10,11,631	23.8101%
	Smt. Savita Gupta	1,24,300	2.9256%	1,16,600	2.7443%
	Smt. Manju Gupta	59,584	1.4024%	56,484	1.3294%
	Mr. Sahil Gupta	45,700	1.0756%	42,600	1.0026%

Date: 24.12.2019

Place: New Delhi



For CENTUM FINANCE LIMITED

Vikas Gupta
Acquirer
Promoter Group

Date: 24.12.2019

To
Listing Department
National Stock Exchange of India Limited
Mumbai – 400001.
Trading Symbol: “BHARATRAS”

To
Company Secretary
Bharat Rasayan Limited
1501, Vikram Tower,
Rajendra Place,
New Delhi – 110008

Sub.: Disclosure under Regulation 7(2) of SEBI (Prohibition of Insider Trading)
Regulations, 2015

Dear Sir,

With reference to the abovementioned subject, please find enclosed herewith the disclosure as per Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015. I, Vikas Gupta, Director of Centum Finance Limited, having its registered office at 1307, Vikram Tower, Rajendra Place, New Delhi – 110008, hereby confirm that M/s. Centum Finance Limited falls under the category of Promoters and Promoters Group of Bharat Rasayan Limited (The Company), submit the disclosure with regard to acquisition of 30,900 equity shares of Bharat Rasayan Limited as inter-se transfer of shares through an On market transaction, duly signed for your information and record.

Thanking You,
Yours sincerely,
For CENTUM FINANCE LIMITED



Vikas Gupta
Acquirer
Promoter Group

Enclosed: Disclosure

FORM C
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: **Bharat Rasayan Limited**
CIN of the company: **L24119DL1989PLC036264**
ISIN of the company: **INE838B01013**

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters / KMP /Directors/ immediate relative to/others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security	No. and % of share holding	Type of security	No.	Value	Transaction Type (Buy/ Sale/ Pledge etc)	Type of security	No. and % of share holding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14
Centum Finance Limited PAN: AACCC9070D CIN: U74899DL1992 PLC050720 ADDRESS: 1307, Vikram Tower, Rajendra Place, New Delhi – 110008 CONTACT NO.: 011-43661111	Promoter Group	Equity Shares	1,01,000 2.3772%	Equity Shares	30,900 0.7273%	₹19,54,42,500/-	Buy	Equity Shares	1,31,900 3.1045%	23.12.2019	23.12.2019	24.12.2019	Inter-se transfer of shares amongst the Promoters and Promoters Group through an On- market transaction

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015

For CENTUM FINANCE LIMITED



Vikas Gupta

Vikas Gupta
Acquirer
Promoter Group

Details of trading in derivatives by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc.)						
Type of Contract	Contract specifications	Buy		Sell		Exchange on which the trade was executed
		Notional Value	Number of units (Contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21
-	-	-	-	-	-	-

Date: 24.12.2019
Place: New Delhi



For CENTUM FINANCE LIMITED

Vikas Gupta
Acquirer
Promoter Group