



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 Mr. Sahil Gupta for Sale of Equity Shares of the Company

Dear Sir,

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, we have received intimation from Mr. Sahil Gupta (part of Promoter Group of the Company), regarding sale of 3,100 equity shares comprising 0.0730% of the paid up share capital of the Company.

In this regard we are submitting herewith the disclosure received from **Mr. Sahil Gupta**, 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

Protecting Prosperity

SAHIL GUPTA
65/41, First Floor,
West Punjabi Bagh,
New Delhi – 110026

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,

In terms of disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Share and Takeover) Regulations, 2011, I, Sahil Gupta, part of Promoter Group of Bharat Rasayan Limited (The Company), resident of 65/41, First Floor, West Punjabi Bagh, New Delhi - 110026, hereby submit the disclosure with regard to the sale of Equity Shares of Company, through an On market transaction under inter-se transfer of 3,100 equity shares, duly signed, for your information and record.

Thanking You,
Yours sincerely,



Sahil Gupta
Promoter Group
Disposer

Disclosures 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 transferor/ disposer and Persons Acting in Concert (PAC) with the transferor	Sahil Gupta - Transferor Centum Finance Limited - Acquirer		
Whether the transferor/ disposer 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/ 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 disposition 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	45,700	1.0756%	1.0756%
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)	45,700	1.0756%	1.0756%
Details of acquisition/ sale			
a) Shares carrying voting rights acquired/ sold	3,100	0.0730%	0.0730%
b) VRs acquired/ sold 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/ sold	-	-	-
d) Shares encumbered/ invoked/ released by the acquirer	-	-	-
Total (a+b+c+d)	3,100	0.0730%	0.0730%
After the disposition holding of:			
a) Shares carrying voting rights	42,600	1.0026%	1.0026%
b) Shares encumbered with the acquirer	-	-	-
c) VRs otherwise than by 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) after acquisition			
Total (a+b+c+d)	42,600	1.0026%	1.0026%
Mode of acquisition/ sale (e.g. open market / off-market/ public issue / rights issue /preferential allotment / inter-se transfer etc.)	INTER SE TRANSFER AMONGST PROMOTERS AND PROMOTERS GROUP THROUGH AN ON MARKET TRANSACTION		
Date of acquisition/ sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	23.12.2019		
Equity share capital/ total voting capital of the TC before the said acquisition/ sale	42,48,740 Equity Shares of ₹10/- each		
Equity share capital/ total voting capital of the TC after the said acquisition/ sale	42,48,740 Equity Shares of ₹10/- each		
Total diluted share/voting capital of the TC after the said acquisition/ sale	42,48,740 Equity Shares of ₹10/- each		

Date: 24.12.2019

Place: New Delhi



Sahil Gupta
Promoter Group
Disposer

SAHIL GUPTA
65/41, First Floor,
West Punjabi Bagh,
New Delhi – 110026

Date: 24.12.2019

To
The 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, Sahil Gupta, part of Promoter Group of Bharat Rasayan Limited (The Company), resident of 65/41, First Floor, West Punjabi Bagh, New Delhi - 110026, hereby submit the disclosure with regard to sale of 3,100 Equity Shares of the Bharat Rasayan Limited, through an On market transaction under inter-se transfer of shares, duly signed, for your information and record.

Thanking You,
Yours sincerely,



Sahil Gupta
Promoter Group
Disposer

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
Sahil Gupta PAN: AKYPG9337N ADDRESS: 65/41, First Floor, West Punjabi Bagh, New Delhi - 110026 CONTACT NO.: 011-43661111	Promoter Group	Equity Shares	45,700 1.0756%	Equity Shares	3,100 / 0.0730% NSE	₹ 1,96,07,500/-	Sell	Equity Shares	42,600 1.0026%	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


Sahil Gupta
Promoter Group
Disposer

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



Sahil Gupta
Promoter Group
Disposer