

SANJAY TRADING AND INVESTMENT COMPANY PRIVATE LIMITED

New Delhi YMCA Building, Gate No. 2, Ground Floor,
1-Jai Singh Raod, New Delhi : 110 001

May 18th, 2020

National Stock Exchange of India Ltd
Exchange Plaza, Bandra-Kurla Complex,
Bandra(E), MUMBAI-400051

Mail.ID takeover@nse.co.in

BSE Limited
Corporate Relationship Department,
1st Floor, New Trading Ring, Rotunda Building,
P.J. Towers, Dalal Street, Fort, MUMBAI-400001

Mail.ID. Corp.relations@bseindia.com

Dear Sir,

Re: GHCL LTD (BSE Code:500171 & NSE Code.GHCL.

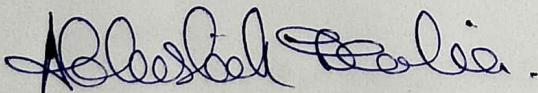
Sub: Disclosure Under Regulation 30(2) of SEBI (SAST) Regulation 2011 for the financial year ended March 31, 2020

Pursuant to Regulations 30(2) of the Securities Exchange Board of India (Substantial acquisition of shares and takeovers) Regulations 2011. Please find the disclosure in the prescribed format for the year ended March 31st, 2020.

You are requested to take on record. In case, you need any further information/clarification, let us inform.

Thanking you,

Yours faithfully
For. SANJAY TRADING AND INVESTMENT COMPANY PVT LTD



(ABHISHEK DHELIA)
Director

DIN.NO. 7180639

CC: Company Secretary, GHCL Ltd, B-38, Sector.1, NOIDA, .U.P.- 201301

ANNEXURE-1

Disclosure under Regulation 30(2) of SEBI(Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for the financial year ended on March 31st, 2020

Part-A-Details of Share holding

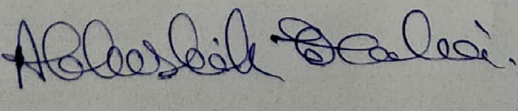
1. Name of the Target Company(TC)	GHCL Limited		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	1. National Stock Exchange of India Ltd ((NSE) 2. BSE. Limited		
3-Particulars of the share holder(s) : e. Name of person(s) together with Persons Acting in Concert(PAC) whose total 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 f. Name(s) of promoter(s), member of the promoter group and PAC with him.	SANJAY TRADING AND INVESTMENT COMPANY PVT LTD		
4. Particulars of the share holding of person(s) mentioned at (3) above	Number of shares	%w.r.t. total share/voting capital where ever applicable	% of total diluted share/voting capital of TC (*)
As of 31 st March 2020 holding of:			
k) Shares	29100	0.03%	0.03%
l) Voting Rights (other wise than by shares)	N.A.	N.A.	N.A.
m) Warrants,	N.A.	N.A.	N.A.
n) Convertible Securities	N.A.	N.A.	N.A.
o) Any other instrument that would entitle the holder to receive shares in the TC.	N.A.	N.A.	N.A.
Total	29100	0.03%	0.03%

(*) 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.

Note :

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

For SANJAY TRADING AND INVESTMENT COMPANY PVT LTD



(ABHISHEK DHELIA)
Director

DIN.NO. 7180639

Part-B

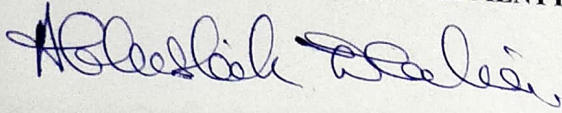
Name of the Target Company: **GHCL Limited**

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.
Anurag Dalmia (HUF)	Promoter	
Anurag Dalmia	Promoter	
Neelabh Dalmia	Promoter	
Gems Commercial Company Limited	Promoter	
Oval Investment Pvt Ltd	Promoter	
Lhonak Enternational Private Limited	Promoter	
Hindustan Commercial Company Limited	Promoter	
International Resources Limited	Promoter	
Carissa Investment Pvt Ltd	Promoter	
Golden Tobacco Limited	Promoter	
Harvatex Engineering And Processing Company Limited	Promoter	
Anurag Trading Leasing And Investment Company Pvt Ltd	Promoter	
WGF Financial Services Ltd	Promoter	
Dalmia Finance Ltd	Promoter	
Archana Trading And Investment Company Pvt. Ltd.	Promoter	
Bharatpur Investment Limited	Promoter	
Sanjay Trading Investment Company Private Limited	Promoter	
General Exports And Credits Limited	Promoter	
Pashupatinath Commercial Pvt. Ltd.	Promoter	
Sovereign Commercial Pvt.Ltd.	Promoter	
Dalmia Housing Finance Ltd	Promoter	
Trishul Commercial Pvt. Ltd.	Promoter	
Swastik Commercial Pvt.Ltd.	Promoter	
Alankar Commercial Private Limited	Promoter	
Ricklunsford Trade And Industrial Investment Ltd	Promoter	
Chirawa Investment Limited	Promoter	
Lakshmi Vishnu Investment Limited	Promoter	
Mourya Finance Limited	Promoter	
Sikar Investment Company Limited	Promoter	
Antarctica Investment Pvt Ltd	Promoter	
Comosum Investment Pvt Ltd	Promoter	
Lovely Investment Pvt Ltd	Promoter	
Altar Investment Pvt Ltd	Promoter	
Ilac Investment Private Limited	Promoter	
Dear Investment Pvt Ltd	Promoter	
Ram Krishna Dalmia Foundation	Promoter	
Banjax Limited	Promoter	
Hexabond Limited	Promoter	

[Handwritten Signature]

For SANJAY TRADING AND INVESTMENTT COMPANY PVT LTD

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(ABHISHEK DHELIA)
Director

DIN.NO. 7180639

Place: DELHI

Date: May 18th, 2020

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.

SANJAY TRADING AND INVESTMENT COMPANY PRIVATE LIMITED

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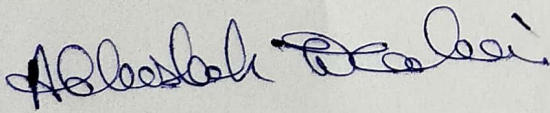
BSE Limiteds
Corporate Relationship Department,
1st Floor, New Trading Ring, Rotunda Building,
P.J. Towers, Dalal Street, Fort, MUMBAI-400001
Mail.ID. Corp.relations@bseindia.com

Dear Sir/Madam,

Sub: Declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Pursuant to Regulation 31 (4) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 as amended thereof, **SANJAY TRADING AND INVESTMENT COMPANY PVT LTD** one of the Promoter of GHCL Limited, hereby declare that we, along with persons acting in concert have not made any encumbrance of equity shares held in GHCL Limited, directly or indirectly, other than those already disclosed during the financial year 2019-20.

For SANJAY TRADING AND INVESTMENT COMPANY PVT LTD



(ABHISHEK DHELIA)
Director

DIN.NO. 7180639

CC: Audit Committee,
GHCL Ltd,
B-38, Sector-1,
NOIDA- 201301, UP