

# COMOSUM INVESTMENT PRIVATE LIMITED

Reg. Office: B-97, 2<sup>ND</sup> FLOOR, AMRITPURI, GARHI, EAST OF KAILASH, NEW DELHI-110065  
CIN: U65993DL1980PTC292755, E-MAIL: comosuminvestment123@rediffmail.com

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

**April 3<sup>rd</sup>,2021**

**Mail.ID takeover@nse.co.in**

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

**Mail.ID. Corp.relations@bseindia.com**

Dear Sir,

Re:Golden Tobacco Limited (BSE Code:500151& NSE Code.GOLDENTOBC).

**Sub: Disclosure Under Regulation 30(2) of SEBI (SAST) Regulation 2011 for the financial year ended March 31, 2021**

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 **financial year ended March 31<sup>st</sup>, 2021.**

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

Thanking you,

Yours faithfully  
**For COMOSUM INVESTMENT PVT LTD.**  
**For Comosum Investment Pvt Ltd**

  
Director/Auth. Signatory

**(VINAY KUMAR MEHTA)**  
**Director**  
**DIN.NO. 00441642**

**CC: Company Secretary, Golden Tobacco Ltd, Darjipura,Post-Amaliyara,Vadodara-Gujarat-390022.**

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## ANNEXURE-1

Disclosures under Regulation 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for the financial year ended on March 31<sup>st</sup>, 2021

### Part-A-Details of Shareholding

1. Name of the Target Company(TC)	Golden Tobacco 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 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.	COMOSUM INVESTMENT PRIVATE LIMITED		
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 <sup>st</sup> March 2021 holding of:			
a) Shares	960	0.00%	0.00%
b) Voting Rights (other wise than by shares)	N.A.	N.A.	N.A.
c) Warrants,	N.A.	N.A.	N.A.
d) Convertible Securities	N.A.	N.A.	N.A.
e) Any other instrument that would entitle the holder to receive shares in the TC.	N.A.	N.A.	N.A.
Total	960	0.00%	0.00%

(\*) 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 COMOSUM INVESTMENT PVT LTD.

For Comosum Investment Pvt Ltd

(VINAY KUMAR MEHTA), Director

Director

DIN.NO. 00441642

Date : April 3<sup>rd</sup>, 2021

Place: DELHI

# COMOSUM INVESTMENT PRIVATE LIMITED

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CIN: U65993DL1980PTC292755, E-MAIL: comosumInvestment123@rediffmail.com

**Name of the Target Company: Golden Tobacco Limited**

## Part-B-

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.
Altar Investment Private Limited	Promoter	
E l e g a n t Investment Private Limited	Promoter	
Carlssa Investment Private Limited	Promoter	
Comosum Investment Private Limited	Promoter	
Dalmia Housing Finance Limited	Promoter	
Dear Investment Private Limited	Promoter	
Lovely Investment Private Limited	Promoter	
Oval Investment Private Limited	Promoter	
Harvatex Engineering and Processing Company Ltd.	Promoter	
Gems Commercial Company Limited	Promoter	
Littlerock Trade and Investment Limited	Promoter	
Hindustan Commercial Company Ltd	Promoter	
WGF Financial Services Limited	Promoter	
Dalmia Finance Limited	Promoter	
Pashupatinath Commercial Private Limited	Promoter	
Sovereign Commercial Private Limited	Promoter	
Swastik Commercial Private Limited	Promoter	
Swagatham Investment Limited	Promoter	
General Exports &Credits Limited	Promoter	
Bharatpur Investment Limited	Promoter	
Chirawa Investment Limited	Promoter	
Mourya Finance Limited	Promoter	
Sikar Investment Company Limited	Promoter	
Lakshmi Vishnu Investment Limited	Promoter	
GHCL Limited	Promoter	
Hotex Company Limited	Promoter	
Lampa Trading Company Limited	Promoter	

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**For COMOSUM INVESTMENT PRIVATE LTD.**

For Comosum Investment Pvt.Ltd

  
Director/Auth. Signatory

**(VINAY KUMAR MEHTA)**

**Director**

**DIN.NO. 00441642**

**Date : April 3<sup>rd</sup>, 2021**

**Place: New Delhi**

**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.

# COMOSUM INVESTMENT PRIVATE LIMITED

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National Stock Exchange of India Ltd  
Exchange Plaza, Bandra - Kurla Complex,  
Bandra (E), MUMBAI-400051  
Mail.ID takeover@nse.co.in

April 3<sup>rd</sup>, 2021

BSE Limited  
Corporate Relationship Department,  
1<sup>st</sup> 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, **COMOSUM INVESTMENT PVT LTD** one of the promoter of **Golden Tobacco Ltd**, hereby declare that we, along with persons acting in concern have not made any encumbrance of equity shares held in **Golden Tobacco Ltd**, directly or indirectly, other than those already disclosed during the financial year 2020-21.

For COMOSUM INVESTMENT PVT LTD.

For Comosum Investment Pvt.Ltd

Director/Auth. Signatory

(VINAY KUMAR MEHTA)

Director

DIN.NO. 00441642

Date : April 3<sup>rd</sup>, 2021

Place: New Delhi

CC: Audit Committee,  
Golden Tobacco Ltd, Darjipura,  
Post Amaliyara.  
Vadodara-Gujarat-390022

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**Annexure -9**

## Initial / Annual Disclosure by the Designated Person on Material Financial Relationship

[Para 14 of Schedule B of SEBI (PIT) Regulations, 2015]

**The Compliance Officer**  
**Golden Tobacco Limited**

Basic information must be filled by Designated		
a	Person PAN Number	
b	Mobile Number	9968297892
c	Email ID	elegantinvestment123@rediffmail.com
d	Designation	Promoter
e	Employee Code	N.A.
f	Cigarette, Cigar & Tobacco Products.etc	N.A.

Dear Sir,

I/We COMOSUM INVESTMENT PVT LTD, in my/our capacity as **Promoter** of the Company hereby provide following information in line with the requirement of Para 14 of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015 for the financial year ended March 31,2021.

Sl. No.	Particulars		Information
1	Name of Immediate Relative and person with whom I have "material financial relationship" <sup>6</sup> .		
	Sl. No.	Particulars	Details of person with whom designated person has material financial relationship i.e. upto 25% of annual income of payer by way of loan/ gift during immediately preceding 12 months.
	i	Name	N.A.
	ii	Relationship	N.A.
	iii	PAN / Aadhar / Driving License / Passport	N.A.
	iv	Mobile Number	N.A.
	v	Land Line Number	N.A.
2	Name of University or College where I did my graduation ( This is one		N.A.

<sup>6</sup> "Material Financial Relationship" shall mean a relationship in which **one person** is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding 12 months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

	<i>time declaration)</i>	
3	Name of my past employers ( <i>This is one time declaration</i> )	N.A.

I/We hereby declare that all the information mentioned above are true and correct.

*I/We hereby promise that I/We shall promptly report the information related to point no. 1 mentioned hereinabove as and when any changes occurs.*

**For COMOSUM INVESTMENT PVT LTD.**

**For Comosum Investment Pvt.Ltd**

  
Director/Auth. Signatory

**(VINAY KUMAR MEHTA)**

**Director**

**DIN.NO. 00441642**

Date : April 3<sup>rd</sup>, 2021

Place.DELHI

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**Annexure -10**

## Quarterly / Annual Statement of transactions cum holding in Securities of the Company

[Para 11 of Schedule B of SEBI (PIT) Regulations, 2015]

**The Compliance Officer**  
**Golden Tobacco Limited.**

Dear Sir,

I/We **COMOSUM INVESTMENT PRIVATE LTD.** in my/Our capacity as Promoter of the Company hereby provide following information with respect to holding of securities of **Golden Tobacco Limited.** either in my/our name or ~~in the name of my/our immediate relative (IR)~~ for the financial year ended **March.31<sup>st</sup>,2021.**

Name of Immediate Relative	Relationship with the Designated Person	PAN Number of the Immediate Relative	DP ID / CL ID of IR	DP ID / CLID of Designated Person
N.A.	N.A.	N.A.	N.A.	<b>IN300183/13253826 PROMOTER</b>

Sl. No.	Particulars	Declaration for Self	Declaration for IR																								
1	Number of Securities held in beginning of the year ended <b>March.31<sup>st</sup>,2021..</b>	<b>960</b>	N.A.																								
2	Details of securities purchased during the year ended <b>March31<sup>st</sup>,2021..</b> <table><tr><th>Date</th><th>Shares purchased</th><th>Rate</th><th>Total value</th></tr><tr><td></td><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td><td></td></tr></table>	Date	Shares purchased	Rate	Total value																					Nil	Nil
Date	Shares purchased	Rate	Total value																								
3	Details of securities sold during the year ended <b>March.31<sup>st</sup>,2021..</b>																										



	<table> <tr> <th>Date</th><th>Shares purchased</th><th>Rate</th><th>Total value</th></tr> <tr><td></td><td></td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td></td></tr> </table>	Date	Shares purchased	Rate	Total value													Nil	Nil
Date	Shares purchased	Rate	Total value																
4	Number of securities Pledged and details of pledge during year ended <b>March.31st,2021.</b>	Nil	Nil																
5	Number of securities as on close of the year ended <b>March.31<sup>st</sup>.2021.</b>	<b>960</b>	N.A.																

I/We hereby declare that I/We or my/our immediate relative have not traded in securities of the company during the Window Closure and all my dealing in securities is in compliance of Code of Conduct of the Company framed under Regulation 9 read with Schedule B of the SEBI (PIT) Regulations, 2015.

I /We hereby declare that all the information given hereinabove is true and correct.

**For COMOSUM INVESTMENT PVT LTD.**

**For Comosum Investment Pvt.Ltd**

*(Signature)*  
Director/Auth. Signatory

**( VINAY KUMAR MEHTA)**

**Director**

**DIN.NO. 00441642**

**Date : April 3rd,2021**

**Place.DELHI**