



Globe House  
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The Company  
Secretary  
ITC Limited  
Virginia House  
37 J. L. Nehru Road  
Kolkata 700 071

The Manager  
Listing Department  
National Stock  
Exchange of India Ltd.  
Exchange Plaza,  
Plot No. C-1, G Block  
Bandra-Kurla Complex,  
Bandra (East)  
Mumbai 400 051

The General Manager  
Dept. of Corporate  
Services.  
Bombay Stock  
Exchange Ltd.  
1<sup>st</sup> floor, New Trading  
Ring  
Rotunda Building, P. J.  
Towers  
Dalal Street, Fort  
Mumbai 400 001

The Secretary  
The Calcutta Stock  
Exchange Ltd.  
7, Lyons Range  
Kolkata 700 001

9 April 2021

Dear Sirs,

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

Pursuant to Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations 2011, please find enclosed the disclosure in the specified format as on 31 March 2021.

For and on behalf of

MYDDLETON INVESTMENT COMPANY LIMITED

**O.J. Martin**  
Assistant Company Secretary

Encl.

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

**Part-A- Details of Shareholding**

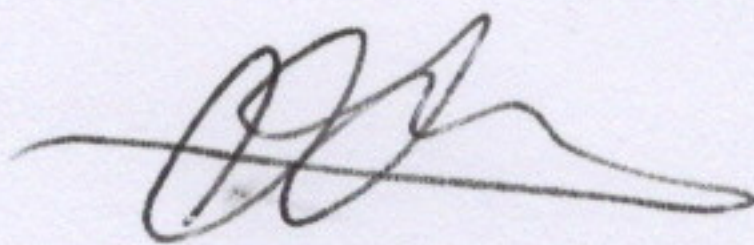
|                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                       |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------|------|--------------|------|--------------|--------------|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--------|------|-------|------|-------|--------------|---------------|--------------------------------------------------------------------|
| 1. Name of the Target Company (TC)                                                                                                                                                                                                                                                                                                                                                                                                         | ITC Limited                                                                                                                                                                                                                                                           |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| 2. Name(s) of the stock exchange(s) where the shares of the TC are listed                                                                                                                                                                                                                                                                                                                                                                  | National Stock Exchange of India Limited<br>Bombay Stock Exchange Limited<br>The Calcutta Stock Exchange Limited                                                                                                                                                      |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| 3. Particulars of the shareholder(s):<br>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.<br><div>or</div><br>b. Name(s) of promoter(s), member of the promoter group and PAC with him. | Tobacco Manufacturers (India) Limited (TMI)<br>Rothmans International Enterprises Limited (RIEL)<br>Myddleton Investment Company Limited (MICL)                                                                                                                       |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| 4. Particulars of the shareholding of person(s) mentioned at (3) above                                                                                                                                                                                                                                                                                                                                                                     | Number of shares                                                                                                                                                                                                                                                      | % w.r.t. total share /voting capital -- wherever applicable | % of total diluted share/voting capital of TC (*) |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| As of March 31st of the year, holding of:<br>a) Shares<br><br>b) Voting Rights (otherwise than by shares)<br>c) Warrants,<br>d) Convertible Securities<br>e) Any other instrument that would entitle the holder to receive shares in the TC.                                                                                                                                                                                               | <table><tr><td>TMI</td><td>2,97,83,47,320</td></tr><tr><td>MICL</td><td>48,63,11,940</td></tr><tr><td>RIEL</td><td>15,49,54,890</td></tr><tr><td><b>Total</b></td><td><b>3,61,96,14,150</b></td></tr></table> <div>--</div> <div>--</div> <div>--</div> <div>--</div> | TMI                                                         | 2,97,83,47,320                                    | MICL | 48,63,11,940 | RIEL | 15,49,54,890 | <b>Total</b> | <b>3,61,96,14,150</b> | <table><tr><td>TMI</td><td>24.19%</td></tr><tr><td>MICL</td><td>3.95%</td></tr><tr><td>RIEL</td><td>1.25%</td></tr><tr><td><b>Total</b></td><td><b>29.39%</b></td></tr></table> <div>--</div> <div>--</div> <div>--</div> <div>--</div> | TMI | 24.19% | MICL | 3.95% | RIEL | 1.25% | <b>Total</b> | <b>29.39%</b> | N/A<br><br><div>--</div> <div>--</div> <div>--</div> <div>--</div> |
| TMI                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2,97,83,47,320                                                                                                                                                                                                                                                        |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| MICL                                                                                                                                                                                                                                                                                                                                                                                                                                       | 48,63,11,940                                                                                                                                                                                                                                                          |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| RIEL                                                                                                                                                                                                                                                                                                                                                                                                                                       | 15,49,54,890                                                                                                                                                                                                                                                          |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| <b>Total</b>                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>3,61,96,14,150</b>                                                                                                                                                                                                                                                 |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| TMI                                                                                                                                                                                                                                                                                                                                                                                                                                        | 24.19%                                                                                                                                                                                                                                                                |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| MICL                                                                                                                                                                                                                                                                                                                                                                                                                                       | 3.95%                                                                                                                                                                                                                                                                 |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| RIEL                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1.25%                                                                                                                                                                                                                                                                 |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| <b>Total</b>                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>29.39%</b>                                                                                                                                                                                                                                                         |                                                             |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |
| <b>Total</b>                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>3,61,96,14,150</b>                                                                                                                                                                                                                                                 | <b>29.39%</b>                                               | --                                                |      |              |      |              |              |                       |                                                                                                                                                                                                                                         |     |        |      |       |      |       |              |               |                                                                    |

**Part-B\*\***

**Name of the Target Company: ITC 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 |
|---------------------------------------------------------------------------|--------------------------------------------------------|----------------------------|
| Tobacco Manufacturers (India) Limited                                     | N/A                                                    | N/A                        |
| Rothmans International Enterprises Limited                                | N/A                                                    | N/A                        |
| Myddleton Investment Company Limited                                      | N/A                                                    | N/A                        |

Signature of the Authorised Signatory



**O.J. Martin**  
**Assistant Company Secretary**

Place: London, United Kingdom

Date 9 April 2021

**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.

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For and on behalf of

TOBACCO MANUFACTURERS (INDIA) LIMITED



**O.J. Martin**  
Assistant Company Secretary

Encl.

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

**Part-A- Details of Shareholding**

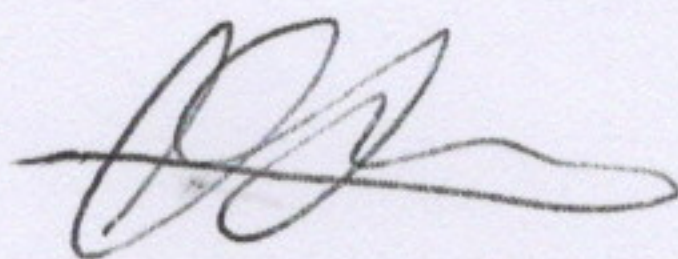
|                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                               |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------|------|--------------|------|--------------|--------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--------|------|-------|------|-------|--------------|---------------|-----|
| 1. Name of the Target Company (TC)                                                                                                                                                                                                                                                                                                                                                                                                         | ITC Limited                                                                                                                                                                                                   |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| 2. Name(s) of the stock exchange(s) where the shares of the TC are listed                                                                                                                                                                                                                                                                                                                                                                  | National Stock Exchange of India Limited<br>Bombay Stock Exchange Limited<br>The Calcutta Stock Exchange Limited                                                                                              |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| 3. Particulars of the shareholder(s):<br>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.<br><div>or</div><br>b. Name(s) of promoter(s), member of the promoter group and PAC with him. | Tobacco Manufacturers (India) Limited (TMI)<br>Rothmans International Enterprises Limited (RIEL)<br>Myddleton Investment Company Limited (MICL)                                                               |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| 4. Particulars of the shareholding of person(s) mentioned at (3) above                                                                                                                                                                                                                                                                                                                                                                     | Number of shares                                                                                                                                                                                              | % w.r.t. total share /voting capital wherever applicable | % of total diluted share/voting capital of TC (*) |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| As of March 31st of the year, holding of:<br>a) Shares                                                                                                                                                                                                                                                                                                                                                                                     | <table><tr><td>TMI</td><td>2,97,83,47,320</td></tr><tr><td>MICL</td><td>48,63,11,940</td></tr><tr><td>RIEL</td><td>15,49,54,890</td></tr><tr><td><b>Total</b></td><td><b>3,61,96,14,150</b></td></tr></table> | TMI                                                      | 2,97,83,47,320                                    | MICL | 48,63,11,940 | RIEL | 15,49,54,890 | <b>Total</b> | <b>3,61,96,14,150</b> | <table><tr><td>TMI</td><td>24.19%</td></tr><tr><td>MICL</td><td>3.95%</td></tr><tr><td>RIEL</td><td>1.25%</td></tr><tr><td><b>Total</b></td><td><b>29.39%</b></td></tr></table> | TMI | 24.19% | MICL | 3.95% | RIEL | 1.25% | <b>Total</b> | <b>29.39%</b> | N/A |
| TMI                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2,97,83,47,320                                                                                                                                                                                                |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| MICL                                                                                                                                                                                                                                                                                                                                                                                                                                       | 48,63,11,940                                                                                                                                                                                                  |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| RIEL                                                                                                                                                                                                                                                                                                                                                                                                                                       | 15,49,54,890                                                                                                                                                                                                  |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| <b>Total</b>                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>3,61,96,14,150</b>                                                                                                                                                                                         |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| TMI                                                                                                                                                                                                                                                                                                                                                                                                                                        | 24.19%                                                                                                                                                                                                        |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| MICL                                                                                                                                                                                                                                                                                                                                                                                                                                       | 3.95%                                                                                                                                                                                                         |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| RIEL                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1.25%                                                                                                                                                                                                         |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| <b>Total</b>                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>29.39%</b>                                                                                                                                                                                                 |                                                          |                                                   |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| 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.                                                                                                                                                                                                                                                                                                                                                         | --                                                                                                                                                                                                            | --                                                       | --                                                |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |
| <b>Total</b>                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>3,61,96,14,150</b>                                                                                                                                                                                         | <b>29.39%</b>                                            | --                                                |      |              |      |              |              |                       |                                                                                                                                                                                 |     |        |      |       |      |       |              |               |     |

**Part-B\*\***

**Name of the Target Company: ITC 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 |
|---------------------------------------------------------------------------|--------------------------------------------------------|----------------------------|
| Tobacco Manufacturers (India) Limited                                     | N/A                                                    | N/A                        |
| Rothmans International Enterprises Limited                                | N/A                                                    | N/A                        |
| Myddleton Investment Company Limited                                      | N/A                                                    | N/A                        |

Signature of the Authorised Signatory



**O.J. Martin**  
**Assistant Company Secretary**

Place: London, United Kingdom

Date 9 April 2021

**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.

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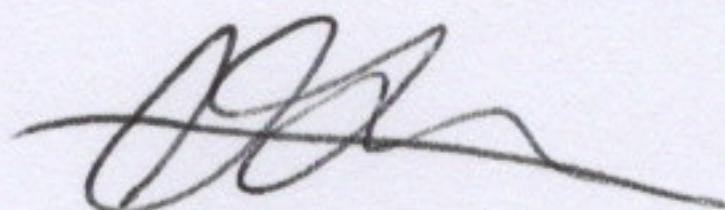
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For and on behalf of

ROTHMANS INTERNATIONAL ENTERPRISES LIMITED



**O.J. Martin**  
Company Secretary

Encl.

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**Part-A- Details of Shareholding**

|                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                 |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------|------|--------------|------|--------------|-------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--------|------|-------|------|-------|-------|--------|-----|
| 1. Name of the Target Company (TC)                                                                                                                                                                                                                                                                                                                                                                                                  | ITC Limited                                                                                                                                                                                     |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
| 2. Name(s) of the stock exchange(s) where the shares of the TC are listed                                                                                                                                                                                                                                                                                                                                                           | National Stock Exchange of India Limited<br>Bombay Stock Exchange Limited<br>The Calcutta Stock Exchange Limited                                                                                |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
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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 | % of total diluted share/voting capital of TC (*) |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
| As of March 31st of the year, holding of:<br>a) Shares                                                                                                                                                                                                                                                                                                                                                                              | <table><tr><td>TMI</td><td>2,97,83,47,320</td></tr><tr><td>MICL</td><td>48,63,11,940</td></tr><tr><td>RIEL</td><td>15,49,54,890</td></tr><tr><td>Total</td><td>3,61,96,14,150</td></tr></table> | TMI                                                      | 2,97,83,47,320                                    | MICL | 48,63,11,940 | RIEL | 15,49,54,890 | Total | 3,61,96,14,150 | <table><tr><td>TMI</td><td>24.19%</td></tr><tr><td>MICL</td><td>3.95%</td></tr><tr><td>RIEL</td><td>1.25%</td></tr><tr><td>Total</td><td>29.39%</td></tr></table> | TMI | 24.19% | MICL | 3.95% | RIEL | 1.25% | Total | 29.39% | N/A |
| TMI                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2,97,83,47,320                                                                                                                                                                                  |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
| MICL                                                                                                                                                                                                                                                                                                                                                                                                                                | 48,63,11,940                                                                                                                                                                                    |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
| RIEL                                                                                                                                                                                                                                                                                                                                                                                                                                | 15,49,54,890                                                                                                                                                                                    |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
| Total                                                                                                                                                                                                                                                                                                                                                                                                                               | 3,61,96,14,150                                                                                                                                                                                  |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
| TMI                                                                                                                                                                                                                                                                                                                                                                                                                                 | 24.19%                                                                                                                                                                                          |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
| MICL                                                                                                                                                                                                                                                                                                                                                                                                                                | 3.95%                                                                                                                                                                                           |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
| RIEL                                                                                                                                                                                                                                                                                                                                                                                                                                | 1.25%                                                                                                                                                                                           |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
| Total                                                                                                                                                                                                                                                                                                                                                                                                                               | 29.39%                                                                                                                                                                                          |                                                          |                                                   |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |
| 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                                                                                                                                                                                                                                                                                                                                                                                                                               | 3,61,96,14,150                                                                                                                                                                                  | 29.39%                                                   | --                                                |      |              |      |              |       |                |                                                                                                                                                                   |     |        |      |       |      |       |       |        |     |

**Part-B\*\***

**Name of the Target Company: ITC 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 |
|---------------------------------------------------------------------------|--------------------------------------------------------|----------------------------|
| Tobacco Manufacturers (India) Limited                                     | N/A                                                    | N/A                        |
| Rothmans International Enterprises Limited                                | N/A                                                    | N/A                        |
| Myddleton Investment Company Limited                                      | N/A                                                    | N/A                        |

Signature of the Authorised Signatory



**O.J. Martin**  
Company Secretary

Place: London, United Kingdom

Date 9 April 2021

**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.