BHAVESH TRUST

12A Green Avenue, Sector- D
Pocket-III, Vasant Kunj,
New Delhi-110070

Date : 18.04.2022

The Listing Department National Stock Exchange of India Limited Exchange Plaza, 5th Floor, Plot No. C-1 Block – G, Bandra-Kurla Complex Bandra (East), Mumbai –400 051. takeover@nse.co.in	The Deptt of Corporate Services The BSE Ltd 25, PJ Towers, Dalal Street, Mumbai – 400001, corp.relations@bseindia.com corp.compliance@bseindia.com
Company Secretary Jindal Poly Films Limiterd 19th K.M., Hapur-Bulandshahr Road P.O. Gulaothi, Distt. Bulandshahr, Uttar Pradesh-203408 cs_jpoly@jindalgroup.com	

Sub: Prior intimation to Stock Exchanges in respect of acquisition under regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

(SCRIP CODE: NSE:- JINDALPOLY, BSE: 500227),

Dear Sir/Madam,

Pursuant to Regulation 10(1) (a) (ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, prior intimation is hereby given in prescribed format under Regulation 10(5) as enclosed about proposed acquisition of 12,08,958 Equity Shares of Jindal Poly Films Limited by the undersigned from SSJ Trust pursuant to inter-se transfer among promoter group entities of Jindal Poly Films Limited.

Thanking you,
Yours truly,

For Bhavesh Trust

For BHAVESH TRUST

TRUSTEE

Bhavesh Jindal
Trustee

Date: 18.04.2022
Place: New Delhi

Encl: as above

BHAVESH TRUST

12A Green Avenue, Sector- D
Pocket-III, Vasant Kunj,
New Delhi-110070

Format for Disclosures under Regulation 10(5) - Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1	Name of the Target Company (TC)	Jindal Poly Films Limited Scrip Code: NSE -- JINDALPOLY BSE – 500227
2	Name of the acquirer(s)	Bhavesh Trust
3	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters.	Yes, acquirer is within the PROMOTER GROUP
4	Details of the proposed acquisition	
	(a) Name of the person(s) from whom shares are to be acquired	SSJ Trust
	(b) Proposed date of acquisition	25.04.2022
	(c) Number of shares to be acquired from each person mentioned in 4(a) above	12,08,958 Equity Shares
	(d) Total shares to be acquired as % of share capital of TC	2.76%
	(e) Price at which shares are proposed to be acquired	Nil (Proposed Transfer to be taken place through Gift deed no price will be charged)
	(f) Rationale, if any, for the proposed transfer	Trustees/ Beneficiary of both Trusts are immediate relatives,so transaction to be taken place as gifts as a token of love and affection.
5	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	10(1)(a)(ii)
6	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.	1. Rs. 1,293.93 Per equity share at National Stock Exchange of India Limited. 2. Rs. 1,294.07 Per equity share at BSE Limited.
7	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	N.A
8	Declaration by the acquirer, that the acquisition price would not be higher by	N.A

BHAVESH TRUST

12A Green Avenue, Sector- D
Pocket-III, Vasant Kunj,
New Delhi-110070

	more than 25% of the price computed in point 6 or point 7 as applicable.	(Proposed Transfer to be taken place through Gift deed no price will be charged)			
9	Declaration by the acquirer, that the transferor and transferee have complied (during 3 years prior to the date of proposed acquisition) / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations, 1997) ii. The aforesaid disclosures made during previous 3 years prior to the date of proposed acquisition to be furnished.	We, Bhavesh Trust, (acquirer) hereby declare that the transferor and transferee have complied with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 during 3 years prior to the date of proposed acquisition. Copy enclosed.			
10	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	We, Bhavesh Trust, (acquirer) hereby declare that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.			
11	Shareholding details	Before the proposed transaction		After the proposed transaction	
		No. of shares/ voting rights	% w.r.t. total share capital of TC	No. of shares/ voting rights	%w.r.t. total share capital of TC
	(a) Acquirer(s) and PACs (other than sellers) (*)				
	1. Bhavesh Trust **(Acquirer)**	2369000	5.41	3577958	8.17
	2. Shyam Sunder Jindal	Nil	0.00	Nil	0.00
	3. Bhavesh Jindal	1000	0.01	1000	0.01
	4. Aakriti Ankit Agarwal	Nil	0.00	Nil	0.00
	5. Aakriti Trust	Nil	0.00	Nil	0.00
	6. Consolidated Photo & Finvest Limited*	823289	1.88	823289	1.88
	7. Jindal Photo Investments Limited*	9245410	21.11	9245410	21.11
	8. Soyuz Trading Company Limited*	12205344	27.87	12205344	27.87
	9. Rishi Trading Company Limited*	5224016	11.93	5224016	11.93
	10. Consolidated Finvest And Holdings Limited	1564072	3.57	1564072	3.57
		31432131	**71.79**	**32641089**	**74.55**
	(b) Seller (s) – 1. SSJ Trust	1208958	2.76	Nil	0.00
		1208958	**2.76**	**Nil**	**0.00**

BHAVESH TRUST

12A Green Avenue, Sector- D
Pocket-III, Vasant Kunj,
New Delhi-110070

	Total Promoters Shareholding	**32641089**	**74.55**	**32641089**	**74.55**

** Through a scheme of amalgamation sanctioned by Hon'ble NCLT, Kolkata vide its order dated 22nd March, 2022, the following Promoter Companies viz. Consolidated Photo & Finvest Limited, Jindal Photo Investments Limited, Soyuz Trading Co Limited and Rishi Trading Co Limited have amalgamated with and into Concatenate Advest Advisory Private Limited. Now Concatenate Advest Advisory Private Limited is the promoter of Jindal Poly Films Limited.*

Note:

- (*) Shareholding of each entity may be shown separately and then collectively in a group.
- The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.

For BHAVESH TRUST

For Bhavesh Trust

TRUSTEE

Bhavesh Jindal
Trustee

Date:
Place: New Delhi

Annexure-1

CONCATENATE ADVEST ADVISORY PRIVATE LIMITED

CIN: U74999WB2020PTC241439
Regd Off: 16-B, Shakespeare Sarani, 2nd Floor, Kolkata, West Bengal, India, 700071
E- Mail: corporate_sectt@jindalgroup.com ; Landline No. : 033-228226190

Ref: CAAPL/Sectt/Apr-22/115

Dated: 8th April, 2022

The Manager, Listing **BSE Limited.** Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001 **Scrip Code: 500227**	**The Company Secretary** **Jindal Poly Films Limited** 19th K M, Hapur Bulandshahr Road P.O.: Gulaothi, Distt: Bulandshahr (UP) 245408 Email: cs_jpoly@jindalgroup.com

Re: Disclosure under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for the financial year ended on 31st March, 2022.

Dear Sir(s),

In compliance with Regulation 31(4) of the aforesaid regulations, please be informed that the Promoters along with persons acting in concert, have not, directly or indirectly, encumbered any shares of Jindal Poly Films Limited as on 31st March, 2022. The list of Promoters and PAC is attached and marked as Annexure I.

This is for your information and records.

Yours Faithfully,

For and on behalf of Promoters
For **Concatenate Advest Advisory Private Limited**

Concatenate Advest Advisory Private Limited

Manoj Kumar Rastogi
Director
DIN: 07585209

CC: Audit Committee,
Jindal Poly Films Ltd.

CONCATENATE ADVEST ADVISORY PRIVATE LIMITED
CIN: U74999WB2020PTC241439
Regd Off: 16-B, Shakespeare Sarani, 2nd Floor, Kolkata, West Bengal, India, 700071
E- Mail: corporate_sectt@jindalgroup.com ; Landline No. : 033-228226190

Annexure I

Name of the Target Company: Jindal Poly Films Ltd.

Name(s) of the person and Persons Acting in Concert (PAC) with the	Whether the person belongs to Promoter/ Promoter group	PAN of the person and PACs
Concatenate Advest Advisory Private Limited*	Promoter	
Consolidated Finvest & Holdings Limited	Promoter	
Bhavesh Trust	Promoter Group	
SSJ Trust	Promoter Group	
Mr. Bhavesh Jindal	Promoter	

** Through a scheme of amalgamation sanctioned by Hon'ble NCLT, Kolkata vide its order dated 22nd March, 2022, the following Promoter Companies viz. Consolidated Photo & Finvest Limited, Jindal Photo Investments Limited, Soyuz Trading Co Limited and Rishi Trading Co Limited have amalgamated with and into Concatenate Advest Advisory Private Limited.*

For and on behalf of Promoters
For Concatenate Advest Advisory Private Limited

Manoj Kumar Rastogi
Director
DIN: 07585209

Disclosure(s) pursuant to SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Request Type
New Disclosure

Disclosure Regulation
Regulation 31(4) - Annual Declaration

Declaration
Pursuant to Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, a declaration is hereby being made that no other Encumbrance on shares of Jindal Poly Films Limited has been made directly or indirectly, other than those already disclosed to the Stock Exchanges during the Financial Year ending 31-Mar-2022

Name of Entity/Person submitting the Declaration
Concatenate Advest Advisory Private Limited

Details of Entity/Person on who's behalf the declaration is being submitted

Name of Entity/Person	Category
Consolidated Finvest & Holdings Limited	Promoter
Bhavesh Trust	Promoter Group
SSJ Trust	Promoter Group
Bhavesh Jindal	Promoter

Declaration
I hereby declare that the disclosure being submitted is true and correct.

Date :

Place :

Signature :

Signed by: Manoj Kumar Rastogi
Reason: Regulation 31(4)- Annual Declaration by National S
Exchange of India Limited (NSE)
eSigned using Aadhaar (digio in)
Date: 2022-04-08 17:04:47 IST

Annexure-2

JINDAL PHOTO INVESTMENTS LIMITED

Ref: JPIL/Sectt/Apr-21/ 4-80

Dated: 05th April, 2021

The Manager, Listing **National Stock Exchange of India Ltd.** Exchange Plaza, Bandra-Kurla Complex Bandra (E), Mumbai - 400 051 **Scrip Symbol:** JINDALPOLY	**The Manager, Listing** **BSE Limited** Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001 **Scrip Code:** 500227
The Company Secretary, **Jindal Poly Films Ltd** 19th K M, Hapur Bulandshahr Road P.O.: Gulaothi, Distt: Bulandshahr (UP) 245408 Email: cs_jpoly@jindalgroup.com	

Subject: Disclosure under Regulation 30 (1) & (2) and 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for the financial year ended on 31st March, 2021

Dear Sir(s),

Please find attached the disclosure pursuant to Regulation 30 (1) & (2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, in respect of promoter's shareholding in Jindal Poly Films Limited as on 31st March, 2021.

Further, in compliance with Regulation 31(4) of the aforesaid regulations, please be informed that the Promoters along with persons acting in concert, have not, directly or indirectly, encumbered any shares of Jindal Poly Films Limited as on 31st March, 2021.

This is for your information and records.

Yours Faithfully,

For and on behalf of Promoters
For **Jindal Photo Investments Limited**

Anil Kaushal
Company Secretary
FCS 4502

JINDAL PHOTO INVESTMENTS NEW DELHI

CC to:
Audit Committee,
Jindal Poly Films Ltd.

JINDAL PHOTO INVESTMENTS LIMITED

DISCLOSURES UNDER REGULATION 30 (2) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVER) REGULATION, 2011

1 Name of the Target Company(TC)	Jindal Poly Films Ltd.
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	National Stock Exchange of India Limited (NSE), BSE Limited (BSE)
3. Particulars of the shareholder(s) : **(a) Name of person 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 target company) is more than 25% of the shares or voting rights of the TC.**	**NIL**
(b) Name(s) of promoter(s), member of the promoter group and PAC with him.	1 Consolidated Photo & Finvest Ltd. 2 Consolidated Finvest & Holdings Ltd. 3 Jindal Photo Investments Ltd. 4 Rishi Trading Company Ltd. 5 Soyuz Trading Company Ltd. 6 Bhavesh Trust 7 SSJ Trust 8 Mr. Bhavesh Jindal 9 Mr. Shyam Sunder Jindal

	4. Particulars of the shareholding of person(s) mentioned at (3) above As of 31st March, 2021	**Number of shares (Equity Shares)**	**% w.r.t total share**	**% of total diluted share/voting capital of TC(*)**
1	Consolidated Photo & Finvest Ltd.	8,23,289	1.88	**N.A.**
2	Consolidated Finvest & Holdings Ltd.	15,64,072	3.57	
3	Jindal Photo Investments Ltd.	92,45,410	21.11	
4	Rishi Trading Company Ltd.	52,24,016	11.93	
5	Soyuz Trading Company Ltd.	1,22,05,344	27.87	
6	Bhavesh Trust	23,69,000	5.41	
7	SSJ Trust	12,08,958	2.76	
8	Mr. Bhavesh Jindal	1,000	0.00	
9	Mr. Shyam Sunder Jindal	-	-	
TOTAL :		**3,26,41,089**	**74.55**	

JINDAL PHOTO INVESTMENTS LIMITED NEW DELHI

Registered Office: 16 B Shakespeare Sarani, 2nd Floor Kolkata West Bengal- 700071
Corporate Office: Plot no. 12, Sector B-1, Local Shopping Complex, Vasant Kunj, New Delhi – 110070
Tel No. 011- 40322100; 033-22828663 CIN: U67120WB1999PLC243861 E-mail: corporate_sectt@jindalgroup.com, Website: www.jindalpil.com

JINDAL PHOTO INVESTMENTS LIMITED

Part-B***

Name of the Target Company: Jindal Poly Films Ltd.

Name(s) of the person and Persons Acting in Concert (PAC) with the	Whether the person belongs to Promoter/ Promoter group	PAN of the person and PACs
Consolidated Photo & Finvest Limited	Promoter	
Consolidated Finvest & Holdings Limited	Promoter	
Jindal Photo Investments Ltd	Promoter	
Rishi Trading Company Limited	Promoter	
Soyuz Trading Company Limited	Promoter	
Bhavesh Trust	Promoter Group	
SSJ Trust	Promoter Group	
Mr. Bhavesh Jindal	Promoter	
Mr. Shyam Sunder Jindal	Promoter	

For and on behalf of Promoters
For **Jindal Photo Investments Limited**

Anil Kaushal
Company Secretary
FCS 4502

Registered Office: 16 B Shakespeare Sarani, 2nd Floor Kolkata West Bengal- 700071

Corporate Office: Plot no. 12, Sector B-1, Local Shopping Complex, Vasant Kunj, New Delhi – 110070

Tel No. 011- 40322100; 033-22828663 CIN: U67120WB1999PLC243861 E-mail: corporate_sectt@jindalgroup.com, Website: www.jindalpil.com

Annexure-3

JINDAL PHOTO INVESTMENTS LIMITED

Ref: JPIL/SECTT/MAY20/257

Dated: 12th May 2020

The Manager, Listing **National Stock Exchange of India Ltd.** Exchange Plaza, Bandra-Kurla Complex Bandra (E), Mumbai - 400 051 Scrip Symbol: JINDALPOLY	**The Manager, Listing** **BSE Limited.** Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001 Scrip Code: 500227
The Company Secretary **Jindal Poly Films Limited** Plot No. 12, Sector B-1, Local Shopping Complex, Vasant Kunj, New Delhi-110070 Email: cs_jpoly@jindalgroup.com	

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

Dear Sirs,

Please find attached disclosure pursuant to Regulation 30 (2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, in respect of promoter's shareholding in Jindal Poly Films Limited as on 31st March, 2020.

This is for your information and records.

Yours Faithfully,

For and on behalf of Promoters
For **Jindal Photo Investments Limited**

INVESTMENTS LIMITED

Anil Kaushal
Company Secretary
FCS 4502

JINDAL PHOTO INVESTMENTS LIMITED

DISCLOSURES UNDER REGULATION 30 (2) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVER) REGULATION, 2011.

1 Name of the Target Company(TC)	**JINDAL POLY FILMS LIMITED**
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	**National Stock Exchange of India Limited (NSE), BSE Limited (BSE)**
3. Particulars of the shareholder(s) : (a) Name of person 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 target company) is more than 25% of the shares or voting rights of the TC.	NIL
(b) Name(s) of promoter(s), member of the promoter group and PAC with him.	1 Consolidated Photo & Finvest Ltd. 2 Consolidated Finvest and Holdings Ltd. 3 Jindal Photo Investments Ltd. 4 Rishi Trading Company Ltd. 5 Soyuz Trading Company Ltd. 6 Bhavesh Trust 7 Aakriti Trust 8 SSJ Trust 9 Ms. Aakriti Ankit Agarwal 10 Mr. Bhavesh Jindal 11 Mr. Shyam Sunder Jindal

	4. Particulars of the shareholding of person(s) mentioned at (3) above As of 31st March, 2019	Number of shares (Equity Shares)	% w.r.t total share	% of total diluted share/voting capital of TC(*)
1	Consolidated Photo & Finvest Ltd.	8,23,289	1.88	N.A.
2	Consolidated Finvest and Holdings Ltd.	15,64,072	3.57	
3	Jindal Photo Investments Ltd.	92,45,410	21.11	
4	Rishi Trading Company Ltd.	52,24,016	11.93	
5	Soyuz Trading Company Ltd.	1,22,05,344	27.87	
6	Bhavesh Trust	23,69,000	5.41	
7	Aakriti Trust	4,55,525	1.04	
8	SSJ Trust	7,52,433	1.72	
9	Ms. Aakriti Ankit Agarwal	1,000	0.00	
10	Mr. Bhavesh Jindal	1,000	0.00	
11	Mr. Shyam Sunder Jindal	-	-	
TOTAL :		3,26,41,089	74.55	

Regd. Office: Plot no. 12, Sector B-1, Local Shopping Complex, Vasant Kunj, New Delhi - 110 070
Tel No. 011-40322100, CIN: U67120DL1999PLC101169 E-mail: cs_jphoto@jindalgroup.com

JINDAL PHOTO INVESTMENTS LIMITED

Part-B***
Name of the Target Company: Jindal Poly Films Ltd.

Name(s) of the person and Persons Acting in Concert (PAC) with the	Whether the person belongs to Promoter/ Promoter group	PAN of the person and PACs
Consolidated Photo and Finvest Ltd.	Promoter	
Consolidated Finvest & Holdings Ltd.	Promoter	
Jindal Photo Investments Ltd.	Promoter	
Rishi Trading Company Ltd.	Promoter	
Soyuz Trading Company Ltd.	Promoter	
Bhavesh Trust	Promoter Group	
Aakriti Trust	Promoter Group	
SSJ Trust	Promoter Group	
Ms. Aakriti Ankit Agarwal	Promoter Group	
Mr. Bhavesh Jindal	Promoter	
Mr. Shyam Sunder Jindal	Promoter	

For and on behalf of Promoters
For **Jindal Photo Investments Limited**

JINDAL PHOTO INVESTMENTS LIMITED

Anil Kaushal
Company Secretary
FCS 4502