

Ekta A. KABRA

46, Gopikunj, Vithal Nagar, 11th Road, JVPD Scheme,
Vile Parle (West), Mumbai - 400 049

March 17, 2020

To,

BSE Limited

Floor 25, Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai - 400 001
Scrip Code: 524109

National Stock Exchange India Limited

Exchange Plaza, C-1, Block-G,
Bandra Kurla Complex, Bandra (East),
Mumbai-400051.
Stock Code: KABRAEXTRU

Sub: Belated Disclosure and Report(s) under Regulation 10(5) and 10 (6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Dear Sirs/Madam,

This is with reference to acquisition of shares of M/s. Kabra Extrusion Technik Ltd. by me, at prevailing market rate during trading hours, as detailed hereunder:

Date of Acquisition	No. of shares acquired	% of acquisition
18/09/2019	15,00,000	4.70%

The above acquisition was made by me by way of Inter-se transfer amongst the members of Promoters group. The Transferor / Seller, M/s. Kolsite Corporation LLP ('KCLLP') and myself (the undersigned) the transferee / acquirer have been collectively holding shares in the said Target Company for a period of more than 3 years prior to date of above transaction and have been disclosed in shareholding pattern filed by the said Company with the stock exchanges. I am also one of the Partners of KCLLP. The above transaction therefore qualifies for exemption under Regulation 10 of SEBI SAST Regulations.

In respect of the above, I had filed disclosure under Reg. 29(2) of SEBI SAST Regulations well within the prescribed time. However, the compliances under Reg. 10 (5) & (6) of the said Regulations have skipped my attention and remained unattended then. I have, so far, not received any notice from the Stock Exchange(s) and / or SEBI in respect of above said lapse.

Upon seeking guidance from an expert, I was advised to file the same belatedly by making an application under SEBI (Settlement Proceedings) Regulation, 2018. I am therefore making suo-moto application for settlement for claiming exemption and also for inadvertent contra-trade of 50,000 shares occurred on same day.

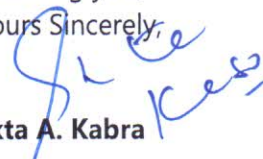
In view of the above, I forward herewith following, in respect of acquisition already made on the said date:

1. Details to Stock Exchanges in respect of inter-se transfer under Reg.10(5) of the said Regulations
2. Report to Stock Exchanges under Regulation 10 (6).

Kindly take the same on your record.

Thanking you,

Yours Sincerely,


Ekta A. Kabra

Encl: as above

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)	Kabra Extrusiontechnik Ltd.
2.	Name of the acquirer(s)	Ekta A. Kabra
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, belongs to Promoter Group
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Kolsite Corporation LLP, represented through following partners: 1. Mr. S. V. Kabra 2. Mr. S. N. Kabra 3. Mr. Anand Kabra 4. Mrs. Ekta Kabra 5. Mr. Varun Kabra 6. Mrs. Veenadevi Kabra 7. Mrs. Saritadevi Kabra
	b. Proposed date of acquisition	18.09.2019 (already acquired)
	c. Number of shares to be acquired from each person mentioned in 4(a) above	15,00,000 equity shares (already acquired)
	d. Total shares to be acquired as % of share capital of TC	4.70 %
	e. Price at which shares are proposed to be acquired	Rs. 65.63 (including Brokerage, other charges & taxes)
	f. Rationale, if any, for the proposed transfer	As mutually decided by the partners Inter-se transfer of shares amongst qualifying persons (promoters) was affected
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Regulation 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.	Yes Volume Weighted Average Market Price on BSE : Rs. 68.11 per share and on NSE :Rs. 65.62 per share
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 more than 25% of the price computed in point 6 or point 7 as applicable.	Yes, I hereby declare that the acquisition price per share of target company was less than 25% of the price computed in point 6 hereinabove.

9.	<p>i. 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)</p> <p>ii. The aforesaid disclosures made during previous 3 years prior to the date of proposed acquisition to be furnished.</p>	Yes, I hereby declare that the transferor and transferee have complied/will comply with applicable disclosure requirements of Chapter V of the Takeover Regulations, 2011.			
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	Yes, I hereby declare that the conditions specified under Regulation 10(1)(a) with respect to exemptions have 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
	- Acquirer(s) Ekta A. Kabra (Transferee)	512162	1.61	2012162	6.31
	- Seller (s) Kolsite Corporation LLP (Transferor)	6263888	19.63	4763888	14.93
	- Promoters [other than Acquirer(s) & seller(s)]				
	• Shreevallabh Gopilal Kabra	3235344	10.14	3235344	10.14
	• Anand Shreevallabh Kabra	6342584	19.88	6342584	19.88
	• Veenadevi Shreevallabh Kabra	1230194	3.86	1230194	3.86
	• Plastiblends India Limited	827372	2.59	827372	2.59
	• Satyanarayan Gopilal Kabra	2000	0.01	2000	0.01
	• Saritadevi Satyanarayan Kabra	2000	0.01	2000	0.01
	• Varun Satyanarayan Kabra	2000	0.01	2000	0.01
	• Khushi Anand Kabra	1000	0.00	1000	0.00
	• Shaurya Anand Kabra	1000	0.00	1000	0.00
	- Total Promoter shareholding	18419544	57.74	18419544	57.74

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.

Ekta Anand Kabra

Place: Mumbai

Date: 16.03.2020

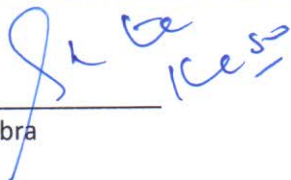
Format for Disclosures under Regulation 10(6) – Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	KABRA EXTRUSIONTECHNIK LIMITED	
2.	Name of the acquirer(s)	Ekta Anand Kabra	
3.	Name of the stock exchange where shares of the TC are listed	BSE Ltd and National Stock Exchange of India Ltd.	
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	As mutually decided by the partners Inter-se transfer of shares amongst qualifying persons (promoters) was affected.	
5.	Relevant regulation under which the acquirer is exempted from making open offer.	Regulation 10(1)(a)(ii)	
6.	Whether disclosure of proposed acquisition was required to be made under Regulation 10 (5) and if so, – Whether disclosure was made and whether it was made within the timeline specified under the regulations. – Date of filing with the stock exchange.	Delayed submission 17.03.2020	
7.	Details of acquisition	Disclosures made/required to be made under regulation 10(5)	Actual
	a. Name of the transferor / seller	Kolsite Corporation LLP, represented through following partners: 1. Mr. S. V. Kabra 2. Mr. S. N. Kabra 3. Mr. Anand Kabra 4. Mrs. Ekta Kabra 5. Mr. Varun Kabra 6. Mrs. Veenadevi Kabra 7. Mrs. Saritadevi Kabra	Kolsite Corporation LLP represented through following partners: 1. Mr. S. V. Kabra 2. Mr. S. N. Kabra 3. Mr. Anand Kabra 4. Mrs. Ekta Kabra 5. Mr. Varun Kabra 6. Mrs. Veenadevi Kabra 7. Mrs. Saritadevi Kabra
	b. Date of acquisition	belated disclosure in respect of acquisition made	18/09/2019
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	1500000	1500000
	d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	4.70%	4.70%
	e. Price at which shares are proposed to be acquired / actually acquired	Rs. 65.63 per share (including brokerage, other charges and taxes)	Rs. 65.63 per share (including brokerage, other charges and taxes)

8. Shareholding details	Pre-Transaction		Post-Transaction	
	No. of shares held	% w.r.t. total share capital of TC	No. of shares held	% w.r.t. total share capital of TC
– Each Acquirer / Transferee(*)				
– Ekta A. Kabra	512162	1.61	2012162	6.31
– Promoters (Other than Sellers)				
• Shreevallabh Gopilal Kabra	3235344	10.14	3235344	10.14
• Anand Shreevallabh Kabra	6342584	19.88	6342584	19.88
• Veenadevi Shreevallabh Kabra	1230194	3.86	1230194	3.86
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• Satyanarayan Gopilal Kabra	2000	0.01	2000	0.01
• Saritadevi Satyanarayan Kabra	2000	0.01	2000	0.01
• Varun Satyanarayan Kabra	2000	0.01	2000	0.01
• Khushi Anand Kabra	1000	0.00	1000	0.00
• Shaurya Anand Kabra	1000	0.00	1000	0.00
– Each Seller / Transferor				
– Kolsite Corporation LLP	6263888	19.63	4763888	14.93
Total Promoters holding	18419544	57.74	18419544	57.74

Notes:

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Ekta Anand Kabra

Date :- March 17, 2020

Place :- Mumbai