

GUARDIAN ADVISORS PVT. LTD.

03/12/2021

To,

M/s Khaitan (India) Limited	BSE Limited	The National Stock Exchange of India Ltd
20 th Floor, 46C, J.L. Nehru Road, Kolkata-700071 Email: kilsugar@gmail.com Phone: 033-40505000	Phiroze Jeejeebhoy Towers, Dalal Street, Fort Mumbai-400001	"Exchange Plaza", 5 th Floor, Plot No. C/1, G Block Bandra Kurla Complex, Bandra (East), Mumbai-400051

Dear Sir/ Madam

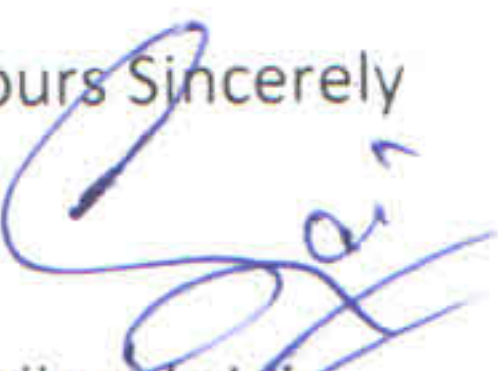
Subject- Disclosure under Regulation 29(2) of SEBI SAST Regulations.

Guardian Advisors Private Limited (GA) which is a SEBI registered portfolio manager wishes to inform the NSE, BSE and Khaitan (India) Limited that it on behalf of its clients, GA and Persons Acting in Concert has acquired further shares in the company and now holds 7.0757% equity stake in Khaitan (India) Limited under various client accounts (Attached in Annexure 1).

The ownership of the underlying asset vests with the client and GA has the power of attorney to manage these client accounts.

Please note that the clients and PAC are only acting in concert with the monies and client accounts given to the Portfolio manager to manage under the discretionary PMS and not in any other account or entity managed by themselves or any other intermediary.

Yours Sincerely



Sidharth Jain

Compliance Officer

Guardian Advisors Private Limited

Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC) KHAITAN (INDIA) LTD

Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer GUARDIAN ADVISORS PRIVATE LIMITED
ON BEHALF OF CLIENTS ATTACHED IN
ANNEXURE-I

Whether the acquirer belongs to Promoter/Promoter group NO

Name(s) of the Stock Exchange(s) where the shares of TC are Listed BSE & NSE

	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
Details of the acquisition / disposal as follows			

Before the acquisition under consideration, holding of :

- | | | | |
|---|----------|---------|---------|
| a) Shares carrying voting rights | | | |
| b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others) | | | |
| c) Voting rights (VR) otherwise than by shares | 3,31,989 | 6.9892% | 6.9892% |
| d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) | | | |
| e) Total (a+b+c+d) | | | |

Details of acquisition/sale

- | | | | |
|--|-------|---------|---------|
| a) Shares carrying voting rights acquired | | | |
| b) VRs acquired /sold otherwise than by shares | 4,105 | 0.0864% | 0.0864% |
| c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold | | | |
| d) Shares encumbered / invoked/released by the acquirer | | | |
| e) Total (a+b+c+/-d) | | | |

After the acquisition/sale, holding of:

- a) Shares carrying voting rights
- b) Shares encumbered with the acquirer
- c) VRs otherwise than by shares
- d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition 3,36,094 7.0757% 7.0757%
- e) Total (a+b+c+d)

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).

OPEN MARKET

Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable

01/12/2021

Equity share capital / total voting capital of the TC before the said acquisition / sale

47,50,000

Equity share capital/ total voting capital of the TC after the said acquisition / sale

47,50,000

Total diluted share/voting capital of the TC after the said acquisition

47,50,000

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(**) 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.

Signature of the acquirer / seller / Authorised Signatory

Place: New Delhi

Date: 03.12.2021

GUARDIAN ADVISORS PVT. LTD.

ANNEXURE-1

KHAITAN (INDIA) LTD

S. No	PAN of the acquirer and/or PACs	Name of the acquirer and Person acting in Concert (PAC) with the acquirer	Whether the acquirer belongs to Promotor/Promoter Group	Qty
1	AAGPJ1291G	Manju Jain	No	10,012
2	AOIPK4934M	Nidhi Kalia	No	17,754
3	ADKPJ2862J	Nitesh Jain	No	39,496
4	AIAPM1835B	Nitin R. Masilamani	No	19,493
5	AISPG7805P	Payal Gupta	No	32,261
6	AWIPG9834A	Priyank Gupta	No	9,678
7	AAIHP2302Q	Priyank Gupta HUF	No	38,305
8	AAIPM3594P	R.J. Masilamani	No	23,003
9	AAKHR6066B	Rahul Bammi HUF	No	19,801
10	ACXPG2334E	Ruchir Gupta	No	10,000
11	AALHR8587A	Ruchir Gupta HUF	No	16,844
12	AFYPJ2735C	Rupali Nitesh Jain	No	18,950
13	AAVHS3454D	Sanjay Sachdeva HUF	No	19,790
14	ABZPG4671M	Shalu Goyal	No	17,269
15	AQOPA3174H	Vertika Agarwal	No	9,700
16	AAHHV0940H	Vishal Garg HUF	No	19,600
17	ADIPJ8021B	Y.K.Jain	No	10,033
Total:				331,989

% as a total of equity capital
Total Equity Shares

6.9892%
4,750,000

San
03 Dec 2021