

# PULIN INVESTMENTS PRIVATE LIMITED

{CIN: U74899DL1995PTC074891}

Regd. Office: 9B, Netaji Subhash Marg, Darya Ganj,  
New Delhi, Delhi-110002, India

Tel: 01130111000

Email: smc@smcindiaonline.com

**Date: 2<sup>nd</sup> March, 2023**

To,

|                                                                                                                                  |                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Listing Operations</b><br>BSE Limited, P J Towers,<br>Dalal Street,<br>Mumbai -400001, India<br><br><b>Scrip Code: 543263</b> | <b>Listing Department</b><br>National Stock Exchange of India Limited<br>Exchange Plaza, C-1, Block G,<br>Bandra Kurla Complex,<br>Bandra<br>(E) Mumbai – 400051<br><br><b>Symbol: SMCGLOBAL</b> |
|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**The Company Secretary,**

**SMC Global Securities Limited**

11/6B, Shanti Chamber, Pusa Road,  
New Delhi-110005, India

**Sub: Revised Disclosure under Regulation 31(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir(s),

With reference to the above, please find the enclosed revised disclosure in terms of Regulation 31(1) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 for release of pledge of 40,00,000 shares of SMC Global Securities Limited.

Kindly take the above on record.

Thanking You,

Yours faithfully,

**For Pulin Investments Private Limited**

**ANURAG** Digitally signed by  
**BANSAL** ANURAG BANSAL  
Date: 2023.03.02  
17:41:25 +05'30'

**Anurag Bansal**

**Director**

**(DIN: 00003294)**

**Place: Mumbai**

**Format for disclosure by the Promoter (s) to the Stock Exchanges and to the Target Company for encumbrance of shares / invocation of encumbrance/ release of encumbrance, in terms of Regulation 31 (1) and 31 (2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

|                                                                                                                    |                                            |                          |                               |                                         |                          |                                                                        |                                                                             |                                                                                                           |                        |               |                          |                                                                                                                             |        |                          |  |
|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------|--------------------------|-------------------------------|-----------------------------------------|--------------------------|------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|------------------------|---------------|--------------------------|-----------------------------------------------------------------------------------------------------------------------------|--------|--------------------------|--|
| Name of the Target company (TC)                                                                                    |                                            |                          |                               |                                         |                          | SMC Global Securities Limited                                          |                                                                             |                                                                                                           |                        |               |                          |                                                                                                                             |        |                          |  |
| Names of the Stock Exchanges where the shares of the target company are listed                                     |                                            |                          |                               |                                         |                          | National Stock Exchange & Bombay Stock Exchange                        |                                                                             |                                                                                                           |                        |               |                          |                                                                                                                             |        |                          |  |
| Date of revised reporting                                                                                          |                                            |                          |                               |                                         |                          | 2 <sup>nd</sup> March, 2023                                            |                                                                             |                                                                                                           |                        |               |                          |                                                                                                                             |        |                          |  |
| Name of the promoter or PAC on whose shares encumbrance has been created/ <del>released</del> / <del>invoked</del> |                                            |                          |                               |                                         |                          | Pulin Investments Private Limited                                      |                                                                             |                                                                                                           |                        |               |                          |                                                                                                                             |        |                          |  |
| Details of the creation of encumbrance: 28 <sup>th</sup> October,2022                                              |                                            |                          |                               |                                         |                          |                                                                        |                                                                             |                                                                                                           |                        |               |                          |                                                                                                                             |        |                          |  |
| Name of the Promoter (s) or PACs with him(**)                                                                      | Promoter holding in the target company (1) |                          |                               | Promoter holding already encumbered (2) |                          | Details of events pertaining to encumbrance (3)                        |                                                                             |                                                                                                           |                        |               |                          | Post event holding of encumbered shares {creation (2)+(3)} / <del>release {(2)-(3)}</del> / <del>invocation {(2)-(3)}</del> |        |                          |  |
|                                                                                                                    | No. of shares                              | % of total share capital | % of diluted share capital(*) | No. of shares                           | % of total share capital | Type of event (creation / <del>release</del> / <del>invocation</del> ) | Date of creation/ <del>invocation</del> / <del>release</del> of encumbrance | Type of encumbrance (pledge/ <del>lien</del> / <del>non disposal</del> / <del>undertaking</del> /other s) | Reason for encumbrance | No. of shares | % of total share capital | Name of the entity in whose favor shares encumbered                                                                         | Number | % of Total share capital |  |
| Mr. Subhash Chand Aggarwal                                                                                         | 80,95,500                                  | 7.73                     | -                             | Nil                                     | Nil                      | -                                                                      | -                                                                           | -                                                                                                         | -                      | -             | -                        | -                                                                                                                           | Nil    | Nil                      |  |
| Mr. Mahesh Chand Gupta                                                                                             | 82,48,500                                  | 7.88                     | -                             | Nil                                     | Nil                      | -                                                                      | -                                                                           | -                                                                                                         | -                      | -             | -                        | -                                                                                                                           | Nil    | Nil                      |  |
| Mrs. Ginni Devi                                                                                                    | 31,84,000                                  | 3.04                     | -                             | Nil                                     | Nil                      | -                                                                      | -                                                                           | -                                                                                                         | -                      | -             | -                        | -                                                                                                                           | Nil    | Nil                      |  |
| Mr. Anurag Bansal                                                                                                  | 2,50,000                                   | 0.24                     | -                             | Nil                                     | Nil                      | -                                                                      | -                                                                           | -                                                                                                         | -                      | -             | -                        | -                                                                                                                           | Nil    | Nil                      |  |
| Mrs. Archana Aggarwal                                                                                              | 30,000                                     | 0.03                     | -                             | Nil                                     | Nil                      | -                                                                      | -                                                                           | -                                                                                                         | -                      | -             | -                        | -                                                                                                                           | Nil    | Nil                      |  |

|                                   |             |       |   |           |       |                   |                                 |        |                    |           |       |                    |           |       |
|-----------------------------------|-------------|-------|---|-----------|-------|-------------------|---------------------------------|--------|--------------------|-----------|-------|--------------------|-----------|-------|
| Mrs. Sushma Gupta                 | 75,66,550   | 7.23  | - | Nil       | Nil   | -                 | -                               | -      | -                  | -         | -     | -                  | Nil       | Nil   |
| Mr. Ajay Garg                     | 8,41,600    | 0.80  | - | Nil       | Nil   | -                 | -                               | -      | -                  | -         | -     | -                  | Nil       | Nil   |
| Pulin Investments Private Limited | 92,77,205   | 8.86  | - | 92,77,205 | 8.86% | Release of pledge | 28 <sup>th</sup> October, 2022. | Pledge | Margin requirement | 40,00,000 | 3.82% | ICICI Bank Limited | 52,77,205 | 5.04% |
| ASM Pipes Private Limited         | 1,86,67,140 | 17.83 | - | 50,00,000 | 4.77% | -                 | -                               | -      | -                  | -         | -     | -                  | 50,00,000 | 4.77% |
| Jai Ambey Share Broking Limited   | 16,16,670   | 1.54  | - | 8,00,000  | 0.76% | -                 | -                               | -      | -                  | -         | -     | -                  | 8,00,000  | 0.76% |
| SMC Share Brokers Limited         | 2,25,000    | 0.21  | - | Nil       | Nil   | -                 | -                               | -      | -                  | -         | -     | -                  | Nil       | Nil   |
| Mr. Damodar Krishan Aggarwal      | 7,81,970    | 0.75  | - | Nil       | Nil   | -                 | -                               | -      | -                  | -         | -     | -                  | Nil       | Nil   |
| Mrs. Hemlata Aggarwal             | 50,00,000   | 4.78  | - | Nil       | Nil   | -                 | -                               | -      | -                  | -         | -     | -                  | Nil       | Nil   |
| Mr. Pranay Aggarwal               | 47,20,550   | 4.51  | - | Nil       | Nil   | -                 | -                               | -      | -                  | -         | -     | -                  | Nil       | Nil   |
| Mr. Himanshu Gupta                | 20,00,000   | 1.91  | - | Nil       | Nil   | -                 | -                               | -      | -                  | -         | -     | -                  | Nil       | Nil   |
| Ms. Shruti Aggarwal               | 20,175      | 0.02  | - | Nil       | Nil   | -                 | -                               | -      | -                  | -         | -     | -                  | Nil       | Nil   |
| Ms. Aditi Aggarwal                | 33,050      | 0.03  | - | Nil       | Nil   | -                 | -                               | -      | -                  | -         | -     | -                  | Nil       | Nil   |

**Signature of the Authorized Signatory**

**Place: Delhi**

**Date: 2<sup>nd</sup> March, 2023**

ANURAG  
BANSAL

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ANURAG BANSAL  
Date: 2023.03.02 17:42:17  
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(\*\*) The names of all the promoters, their shareholding in the target company and their pledged shareholding as on the reporting date should appear in the table irrespective of whether they are reporting on the date of event or not.

(\*) Total share 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.