

Date: October 16, 2020

To,
The Manager,
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G,
Bandra Kuria Complex,
Bandra East, Mumbai - 400051

To,
The Manager
BSE Limited
P. J. Towers, Dalal Street
Mumbai - 400001

Subject: Intimation under Regulation 10(5) and Report under Regulation 10(6) of Securities and Exchange Board of India (Substantial Acquisition of Shares & Takeover) Regulations, 2011 ('SEBI (SAST) Regulations, 2011')

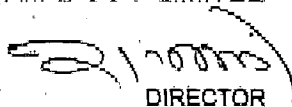
Dear Sir/Madam,

This is in reference to the above captioned subject, we, Sangam E-com Limited ('Acquirer') acquired 5,979,759 (Fifty Nine Lacs Seventy Nine Thousand Seven Hundred and Fifty Nine) Equity Shares representing 15.17% of the paid-up share capital of Sangam (India) Limited ('Target Company') from Sangam Business Credit Limited ('Seller'), existing promoter of the Target Company from August 20, 2019 to August 26, 2019, however, inadvertently the intimation under Regulation 10(5) and report under Regulation 10(6) of the SEBI (SAST) Regulation, 2011 was missed to file at the time of transaction and the same is being filed now for your reference.

Kindly take the above information in your records.

For and on behalf of

~~FOR SANGAM E-COM LIMITED~~


DIRECTOR

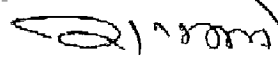
(Authorised Signatory)

Disclosure under Regulation 10(5)

**Intimation to Stock Exchanges In respect of acquisition under Regulation 10(1)(a) of
Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers)
Regulations, 2011**

S. No.	Particulars	Details
1.	Name of the Target Company (TC)	Sangam (India) Limited
2.	Name of the Acquirer	Sangam E-com Limited (hereinafter referred as 'Acquirer' or 'Transferee')
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	Acquirer is the existing promoter of the Target Company.
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Sangam Business Credit Limited (hereinafter referred as 'Seller' or 'Transferor')
	b. Proposed date of acquisition	August 20, 2019 to August 26, 2019
	c. Number of shares to be - acquired from each person mentioned in 4(a) above	5,979,759 (Fifty-Nine Lacs Seventy Nine Thousand Seven Hundred and Fifty Nine) Equity Shares representing 15.17% of the paid-up share capital of the Target Company.
	d. Total shares to be acquired as % of share capital of TC	5,979,759 (Fifty-Nine Lacs Seventy Nine Thousand Seven Hundred and Fifty Nine) Equity Shares representing 15.17% of the paid-up share capital of the Target Company.
	e. Price at which shares are proposed to be acquired	1,200,000 Shares @ INR 40.00 per share 1,196,950 Shares @ INR 40.15 per share 1,199,999 Shares @ INR 40.30 per share 1,199,999 Shares @ INR 40.35 per share 1,182,811 Shares @ INR 35.20 per share Total No. of Shares - 5,979,759 Shares

FOR SANGAM E-COM LIMITED



DIRECTOR

	f. Rationale, if any, for the proposed transfer	Internal reorganization of promoter shareholding								
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Sub-clause (II) of clause (a) of sub-regulation (1) of Regulation 10 of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.								
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.	The shares of the Target Company were frequently traded on National Stock Exchange of India Limited ('NSE') and BSE Limited ('BSE') as on the date of transaction i.e. August 20, 2019. The volume weighted average market price for the period of 60 trading days calculated on the basis of NSE data preceding the date of transaction i.e. August 20, 2019 is INR 46.23 (Indian Rupees Forty-Six and Twenty-Three Paise Only).								
7.	If In-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not Applicable								
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.	The Acquirer does hereby declare that the acquisition price was not higher by more than 25% of the price computed in point 6 above.								
9.	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) ii. The aforesaid disclosures made	The Acquirer does hereby declare that the transferor and transferee have complied with the applicable disclosure requirements in terms of Chapter V of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011. The details of the disclosures made during the previous three years prior to the transaction under Chapter V of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011 are enclosed herewith: <table><tr><td>S.</td><td>Filed By</td><td>Date of Filing</td><td>Type</td><td>of</td></tr></table>				S.	Filed By	Date of Filing	Type	of
S.	Filed By	Date of Filing	Type	of						

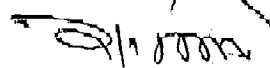
FOR SANGAM E COM LIMITED


DIRECTOR

	during previous 3 years prior to the date of proposed acquisition to be furnished.	No.			Transaction
		Regulation 29(2)			
		1.	Sangam Business Credit Limited	16.11.2016	Off Market
		2.	Sangam E-com Limited	23.07.2019 (revised on 28.08.2020 due to some typo error)	Open Market
		Regulation 30(2)			
		3.	Promoter	08.04.2014	Annual Disclosure u/r 30
		4.	and	02.04.2015	
		5.	Promoter Group	05.04.2016	
		Regulation 31			
		Since, there was no pledge of shares during last three years, hence, no disclosure was applicable.			
		The applicable disclosures filed during last three years prior to the date of transaction is annexed herewith as Annexure A .			

10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	The Acquirer do hereby declare that all the conditions as specified in Regulation 10(1)(a) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011 with respect to exemption has been duly complied with.			
11.	Shareholding details	Before the proposed transaction		After the proposed transaction	
		No. of shares /voting	% w.r.t total share	No. of shares /voting	% w.r.t total share

FOR SANGAM E-COM LIMITED



DIRECTOR

		rights	capital of TC	rights	capital of TC
	Acquirer (other than Seller)				
	▪ Sangam E-com Limited	1,950,275	4.95	7,933,087*	20.12
	PACs				
	▪ Ram Pal Soni	453,950	1.15	453,950	1.15
	▪ Shrinivas Modani	99,779	0.25	99,779	0.25
	▪ Radha Devi Soni	377,761	0.96	377,761	0.96
	▪ Badrilal Rampal Soni HUF	128,268	0.33	128,268	0.33
	▪ Ram Pal Soni HUF	248,300	0.63	248,300	0.63
	▪ Anurag Soni	2,710,397	6.88	2,710,397	6.88
	▪ Mamta Modani	105,404	0.27	105,404	0.27
	▪ Antima Soni	46,050	0.12	46,050	0.12
	▪ Archana Sodani	60,774	0.15	60,774	0.15
	▪ Anjana Soni	3,750	0.01	3,750	0.01
	▪ Sangam Suiting Pvt. Ltd.	263,670	0.67	263,670	0.67
	▪ Sarvodaya Holding Pvt. Ltd.	1,127,771	2.86	1,127,771	2.86
	▪ Park View Investment Pvt. Ltd.	226,065	0.57	226,065	0.57
	▪ Sangam Fincap Ltd.	2,216,145	5.62	2,216,145	5.62
	▪ Neelgagan Commercial Company Ltd.	1,400,000	3.55	1,400,000	3.55
	▪ Sahyog Finance Ltd.	172,750	0.44	172,750	0.44
	▪ Necco Shipping Company Pvt. Ltd.	282,450	0.72	282,450	0.72
	▪ Finworth Investment Pvt. Ltd.	475,260	1.21	475,260	1.21
	▪ Nikita Credits Pvt. Ltd.	358,200	0.91	358,200	0.91
	▪ Scorpio Credits Pvt. Ltd.	536,255	1.36	536,255	1.36
	▪ Sangam Granites Pvt. Ltd.	120,815	0.31	120,815	0.31
	▪ Hawamahal Finance Pvt. Ltd.	2,335,500	5.92	2,335,500	5.92
	Total (A)	15,699,589	39.82	21,682,401	55.00
	Seller				
	▪ Sangam Business Credit Limited	5,982,812	15.18	0**	0.00
	Total (B)	5,982,812	15.18	0	0.00
	Total (A+B)	21,682,401	55.00	21,682,401	55.00

FOR SANGAM E-COM LIMITED


DIRECTOR

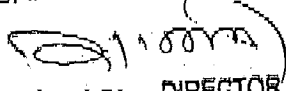
(*) These include 3,053 Equity Shares acquired by the Acquirer through Open Market on August 20, 2020; August 21, 2019 and August 26, 2019.

(**) This is arrived after taking into consideration sale of 3,052 Equity Shares by Seller on August 20, 2019 in Open Market and 1 Equity share on August 26, 2020.

For and on behalf of

Sangam E-com Limited

FOR SANGAM E-COM LIMITED


(Authorised Signatory) DIRECTOR

Date: October 16, 2020

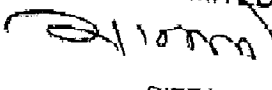
Place: Bhillwara

Disclosures under Regulation 10(6)

Report to Stock Exchange in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers)

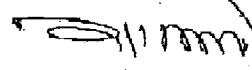
Regulations, 2011

1.	Name of the Target Company (TC)	Sangam (India) Limited	
2.	Name of the acquirer(s)	Sanagam E-com Limited (hereinafter referred as 'Acquirer' or 'Transferee')	
3.	Name of the stock exchange where shares of the TC are listed	National Stock Exchange of India Limited ('NSE') BSE Limited ('BSE')	
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Internal reorganization of promoter shareholding	
5.	Relevant regulation under which the acquirer is exempted from making open offer.	Sub-clause (ii) of clause (a) of sub-regulation (1) of Regulation 10 of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011.	
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.	- Yes, disclosure under Regulation 10(5) was required to be made for the acquisition and the same is made along with the Report under Regulation 10(6) on October 16, 2020. - The disclosure was filed with NSE and BSE on October 16, 2020 with a delay of 409 days.	
7.	Details of acquisition	Disclosures required to be made under Regulation 10(5)	Whether the disclosures under Regulation 10(5) are actually made
	a. Name of the transferor / seller	Sangam Business Credit Limited	Sangam Business Credit Limited
	b. Date of acquisition	August 20, 2019 to August 26, 2019	August 20, 2019 to August 26, 2019
	c. Number of shares/ voting rights in respect of the acquisitions	5,979,759 (Fifty-Nine Lacs Seventy Nine Thousand	5,979,759 (Fifty-Nine Lacs Seventy Nine Thousand

FOR SANGAM E-COM LIMITED

DIRECTOR

	from each person mentioned in 7(a) above	Seven Hundred and Fifty Nine) Equity Shares		Seven Hundred and Fifty Nine) Equity Shares	
	d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	15.17% of the Paid-up Share Capital of the Target Company.		15.17% of the Paid-up Share Capital of the Target Company.	
	e. Price at which shares are proposed to be acquired / actually acquired	1,200,000 Shares @ INR 40.00 per share 1,196,950 Shares @ INR 40.15 per share 1,199,999 Shares @ INR 40.30 per share 1,199,999 Shares @ INR 40.35 per share 1,182,811 Shares @ INR 35.20 per share		1,200,000 Shares @ INR 40.00 per share 1,196,950 Shares @ INR 40.15 per share 1,199,999 Shares @ INR 40.30 per share 1,199,999 Shares @ INR 40.35 per share 1,182,811 Shares @ INR 35.20 per share	
8.	Shareholding details	Pre-Transaction		Post-Transaction	
		No. of shares held	% w.r.t. to total share capital of TC*	No. of shares held	% w.r.t. to total share capital of TC*
Acquirer					
	Sangam E-com Limited	1,950,275	4.95	7,933,087*	20.12
PACs					
	Ram Pal Soni	453,950	1.15	453,950	1.15
	Shriniwas Modani	99,779	0.25	99,779	0.25
	Radha Devi Soni	377,761	0.96	377,761	0.96
	BadrilalRampalSoni HUF	128,268	0.33	128,268	0.33
	Ram Pal Soni HUF	248,300	0.63	248,300	0.63
	Anurag Soni	2,710,397	6.88	2,710,397	6.88
	Mamta Modani	105,404	0.27	105,404	0.27
	Antima Soni	46,050	0.12	46,050	0.12
	Archana Sodani	60,774	0.15	60,774	0.15
	Anjana Soni	3,750	0.01	3,750	0.01
	Sangam Suiting Pvt. Ltd.	263,670	0.67	263,670	0.67

FOR SANGAM E-COM LIMITED


DIRECTOR

Sarvodaya Holding Pvt. Ltd.	1,127,771	2.86	1,127,771	2.86
Park View Investment Pvt. Ltd.	226,065	0.57	226,065	0.57
Sangam Fincap Ltd	2,216,145	5.62	2,216,145	5.62
Neelgagan Commercial Company Ltd.	1,400,000	3.55	1,400,000	3.55
Sahyog Finance Ltd.	172,750	0.44	172,750	0.44
Necco Shipping Company Pvt. Ltd.	282,450	0.72	282,450	0.72
Finworth Investment Pvt. Ltd.	475,260	1.21	475,260	1.21
Nikita Credits Pvt. Ltd.	358,200	0.91	358,200	0.91
Scorpio Credits Pvt. Ltd.	536,255	1.36	536,255	1.36
Sangam Granites Pvt. Ltd.	120,815	0.31	120,815	0.31
Hawamahal Finance Pvt. Ltd.	2,335,500	5.92	2,335,500	5.92
TOTAL	15,699,589	39.82	21,682,401	55.00
Seller				
Sangam Business Credit Limited	5,982,812	15.18	0**	0.00
TOTAL	5,982,812	15.18	0	0.00

(*) These include 3,053 Equity Shares acquired by the Acquirer through Open Market on August 20, 2020; August 21, 2019 and August 26, 2019.

(**) This is arrived after taking into consideration sale of 3,052 Equity Shares by Seller on August 20, 2019 in Open Market and 1 Equity share on August 26, 2020.

For and on behalf of
Sangam E-com Limited
FOR SANGAM E-COM LIMITED

(Authorised Signatory) DIRECTOR

Date: October 16, 2020

Place: Bhilwara