Anurag Soni
01, Main Sector, Shastri Nagar,
Bhilwara – 311 001 (Raj.)
Phone: 01482-245400(O)

Date: 14.08.2020

To,
The Manager,
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G,
Bandra Kurla 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 & Takeovers) Regulations, 2011 ('SEBI (SAST) Regulations, 2011')

Dear Sir/Madam,

This is in reference to the above captioned subject, I, Anurag Soni **('Acquirer')**, has acquired 1,606,000 (Sixteen Lacs and Six Thousand) Equity Shares representing 4.07% of the paid-up share capital of Sangam (India) Limited **('Target Company')** from Badrilal Rampal Soni HUF**('Seller')**, existing promoter of the Target Company on March 24, 2017, 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.

The Acquirer and Seller are member of Promoter and Promoter group of the Target Company and are qualifying persons in terms of the provisions of Regulation 10(1)(a)(ii) of the SEBI (SAST) Regulations, 2011, hence intimation under Regulation 10(5) and report under Regulation 10(6) of SEBI (SAST) Regulations, 2011 for the acquisition of shares is being submitted herewith.

Kindly take the above information in your records.

(Anurag Soni)
Promoter
Sangam (India) Limited

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	Mr. Anurag Soni (Hereinafter referred as 'Acquirer'/ '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	Badrilal Rampal Soni HUF (Hereinafter referred to as 'Seller' or 'Transferor')
	b. Proposed date of acquisition	24th March, 2017, Friday
	c. Number of shares to be acquired from each person mentioned in 4(a) above	1,606,000 (Sixteen Lacs and Six Thousand) representing 4.07% of the paid-up share capital of the Target Company.
	d. Total shares to be acquired as % of share capital of TC	1,606,000 (Sixteen Lacs and Six Thousand) representing 4.07% of the paid-up share capital of the Target Company.
	e. Price at which shares are proposed to be acquired	260/-
	f. Rationale, if any, for the proposed transfer	Internal reorganization of promoters 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 10of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

<table>
<tr><td>6.</td><td>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.</td><td>The shares of the Target Company were frequently traded on National Stock Exchange of India Limited ('NSE') and infrequently traded on BSE Limited ('BSE') as on 24th March, 2017.
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 is INR 269.10(Indian Rupees Two Hundred Sixty-Nine and Ten Paisa Only).</td></tr>
<tr><td>7.</td><td>If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8</td><td>Not Applicable</td></tr>
<tr><td>8.</td><td>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.</td><td>The Acquirer do hereby declare that the acquisition price was not higher by more than 25% of the price computed in point 6 above.</td></tr>
<tr><td>9.</td><td>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 during previous 3 years prior to the date of proposed acquisition to be furnished.</td><td>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 applicable and made during the previous three years under Chapter V of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011 are enclosed herewith:

<table>
<tr><th>S. No.</th><th>Filed By</th><th>FY</th><th>Date of Filing</th><th>Type</th></tr>
<tr><td>1.</td><td rowspan="3">Promoter and Promoter Group</td><td>2013-14</td><td>08.04.14</td><td rowspan="3">Annual Disclosure u/r 30</td></tr>
<tr><td>2.</td><td>2014-15</td><td>02.04.15</td></tr>
<tr><td>3.</td><td>2015-16</td><td>05.04.16</td></tr>
</table></td></tr>
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		Apart from the above, no disclosure was applicable on the Transferor and Transferee. 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 rights	**% w.r.t. total share capital of TC**	**No. of shares /voting rights**	**% w.r.t. total share capital of TC**
	Acquirer(other than Seller)				
	▪ Anurag Soni	39,397	0.10	1,645,397	4.17
	PACs(other than Seller)				
	▪ Ram Pal Soni	453,950	1.15	453,950	1.15
	▪ Shri Niwas Modani	99,779	0.25	99,779	0.25
	▪ Radha Devi Soni	377,761	0.96	377,761	0.96
	▪ Ram Pal Soni HUF	248,300	0.63	248,300	0.63
	▪ 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
	▪ Sangam Business Credit Ltd.	5,982,812	15.18	5,982,812	15.18

	▪ 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	**16,932,858**	**42.96**	**18,538,858**	**47.03**
	Seller				
	▪ Badrilal Rampal Soni HUF	1,734,268	4.40	128,268	0.33
	Total	**1,734,268**	**4.40**	**128,268**	**0.33**

(Anurag Soni)
Promoter
Sangam (India) Ltd.

Date: 14.08.2020
Place: Bhilwara

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)	Anurag Soni	
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 promoters 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.	- The 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 14.08.2020. - The disclosure was filed with NSE and BSE on 14.08.2020 with a delay of 1111 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	Badrilal Rampal Soni HUF	Badrilal Rampal Soni HUF
	b. Date of acquisition	March 24, 2017	March 24, 2017
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	1,606,000 (Sixteen Lacs and Six Thousand) Equity Shares	1,606,000 (Sixteen Lacs and Six Thousand) Equity Shares
	d. Total shares proposed to be	4.07% of the Paid-up Share	4.07% of the Paid-up Share

	acquired / actually acquired as a % of diluted share capital of TC	Capital of the Target Company.		Capital of the Target Company.	
	e. Price at which shares are proposed to be acquired / actually acquired	260/- per share		260/- 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				
	Anurag Soni	39,397	0.10	1,645,397	4.17
	PACs				
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	TOTAL	**16,932,858**	**42.96**	**18,538,858**	**47.03**
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(Anurag Soni)

Promoter

Sangam (India) Limited

Date: 14.08.2020

Place: Bhilwara