# SAMRUDDHI INVESTORS SERVICES PVT.LTD.
# 10TH FLOOR, KATARIA ARCADE
# OFF S G HIGHWAY, POST : MAKARBA
# AHMEDABAD – 380051

By Courier / E Mail

17th February, 2012

| | | |
|---|---|---|
| The General Manager<br>Bombay Stock Exchange Ltd.<br>Phiroze Jeejeebhoy Towers<br>Dalal Street<br>Mumbai 400 001 | The Asst Vice President<br>The National Stock Exchange of India Ltd.<br>Exchange Plaza, 5th Floor<br>Plot No. C/1, G Block<br>Bandra Kurla Complex<br>Bandra (East)<br>Mumbai -+ 400051 | The Company Secretary<br>Sanghi Industries Limited<br>Sanghinagar P.O.<br>Hayatnagar Mandal,<br>R R District<br>Andhra Pradesh – 501511 |

Dear Sir,

**Sub : Disclosures under Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations 2011 and SEBI (Prohibition of Insider Trading) Regulations, 1992 (as amended)**

* * *

With reference to the above subject matter, please find enclosed

- The disclosures in the prescribed formats made under Regulation 29(1) read with Regulation 31(1) and 31(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

- The disclosure in Form No. B of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 (as amended) as required under Regulation 13(2) read with 13(2A) and 13(6), in the prescribed format.

Kindly find the above in order and take the same on record at the earliest.

Yours faithfully,

For, Samruddhi Investors Services Pvt. Ltd.

Director

SAMRUDDHI INVESTORS SERVICES PRIVATE LIMITED

Encl : as above

## Annexure-A

## Format for Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

| | | | |
|---|---|---|---|
| 1. Name of the Target Company (TC) | Sanghi Industries Limited | | |
| 2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer | Samruddhi Investors Services Pvt. Ltd. (Acquirer at present) and others forming part of Promoter group (as per annexure enclosed) | | |
| 3. Whether the acquirer belongs to Promoter/Promoter group | Yes | | |
| 4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed | Bombay Stock Exchange Limited and National Stock Exchange of India Limited | | |
| 5. Details of the acquisition of shares/voting rights/holding of the Acquirer and PAC | Number | % w.r.t.total share/voting capital wherever applicable | % w.r.t. total diluted share/voting capital of the TC (*) |
| Before the acquisition under consideration, holding of : | | | |
| a) Shares carrying voting rights | 112331250 | 51.06% | 51.06% |
| b) Voting rights (VR) otherwise than by equity shares | - | - | - |
| 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) | - | - | - |
| Total (a+b+c) | 112331250 | 51.06% | 51.06% |

For, Samruddhi Investors Services Private Limited

Director

| | | | |
|---|---|---|---|
| Details of acquisition<br>a) Shares carrying voting rights acquired<br>b) VRs acquired otherwise than by equity shares<br>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 | 10998950<br>-<br>- | 5%<br>-<br>- | 5%<br>-<br>- |
| Total (a+b+c) | 10998950 | 5% | 5% |
| After the acquisition, holding of:<br>a) Shares carrying voting rights<br>b) VRs otherwise than by equity shares<br>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) after acquisition | 123330200<br>-<br>- | 56.06%<br>-<br>- | 56.06%<br>-<br>- |
| Total (a+b+c) | 123330200 | 56.06% | 56.06% |
| 6. Mode of acquisition (e.g. open market / public issue / rights issue /preferential allotment / inter-se transfer, etc.) | Open market | | |

For, Samruddhi Investors Services Private Limited

Director

| | |
|---|---|
| 7. Date of acquisition of/ date of receipt of intimation of allotment of shares /VR/ warrants/convertible securities/any other instrument that entitles the acquirer to receive shares in the TC | 15/02/2012 |
| 8. Equity share capital / total voting capital of the TC before the said acquisition | 21,99,79,000 equity shares of Rs. 10 each aggregating Rs. 219,97,90,000/- (Rupees Two Hundred Nineteen Crore Ninety Seven Lacs and Ninety Thousand Only) |
| 9. Equity share capital/ total voting capital of the TC after the said acquisition | 21,99,79,000 equity shares of Rs. 10 each aggregating Rs. 219,97,90,000/- (Rupees Two Hundred Nineteen Crore Ninety Seven Lacs and Ninety Thousand Only) |
| 10. Total diluted share/voting capital of the TC after the said acquisition | 21,99,79,000 equity shares of Rs. 10 each aggregating Rs. 219,97,90,000/- (Rupees Two Hundred Nineteen Crore Ninety Seven Lacs and Ninety Thousand Only) |

**Note:**

(*) 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.

For, Samruddhi Investors Services Pvt. Ltd.

For, Samruddhi Investors Services Private Limited

Alok Sanghi
Director

Director

Signature of the acquirer / Authorised Signatory

Place : Ahmedabad

Date : 17/02/2012

**Annexure to Regulation 29(1) of SEBI (SAST) Regulations, 2011**

| Name of Promoter/PAC with him | Pre-acquisition Holding | |
|---|---|---|
| | Number | % of total share capital |
| **Individuals** | | |
| Sri Ram Sharan Sanghi * | 187000 | 0.09 |
| Sri Anand Prakash Sanghi * | 187000 | 0.09 |
| Sri Sudhir Sanghi * | 187000 | 0.09 |
| Sri Ravi Sanghi ** | 3012500 | 1.37 |
| Sri Gireesh Sanghi** | 2807900 | 1.28 |
| Smt. Kamala Rani Sanghi * | 140250 | 0.06 |
| Smt. Anjana Sanghi * | 140250 | 0.06 |
| Smt. Usha Sanghi * | 140250 | 0.06 |
| Smt. Anita Sanghi ** | 1020200 | 0.46 |
| Smt. Alka Sanghi** | 1074150 | 0.49 |
| Sri Anand Sanghi (HUF) * | 7866250 | 3.58 |
| Sri Sudhir Sanghi (HUF) * | 7866000 | 3.58 |
| Sri Ravi Sanghi (HUF) * | 7866000 | 3.58 |
| Sri Gireesh Sanghi (HUF) * | 7866000 | 3.58 |
| Miss. Swati Sanghi * | 343750 | 0.16 |
| Miss Pooja Sanghi * | 343750 | 0.16 |
| Miss. Ekta Sanghi * | 343750 | 0.16 |
| Miss Aarti Sanghi * | 343750 | 0.16 |
| Sri Amit Sanghi * | 5279600 | 2.40 |
| Sri Siddharth Sanghi * | 5279600 | 2.40 |
| Sri Aditya Sanghi ** | 2889500 | 1.31 |
| Sri Alok Sanghi ** | 2889500 | 1.31 |
| Sri Gaurav Sanghi * | 2639500 | 1.20 |
| Sri Ashish Sanghi * | 2639500 | 1.20 |
| **Bodies Corporate** | | |
| Sanghi Polyesters Limited ** | 5412800 | 2.46 |
| Sanghi Textiles Pvt. Ltd. * | 5870000 | 2.67 |
| SZF Private Limited ** | 9284000 | 4.22 |
| Sanghi Filaments Pvt. Ltd. ** | 3037500 | 1.38 |
| Sanghi Threads Pvt. Ltd. ** | 2354000 | 1.07 |
| Sanghi Polymers Pvt. Ltd. ** | 4700000 | 2.14 |
| Sanghi Synthetics Pvt. Ltd. ** | 2275000 | 1.03 |
| Sanghi Poly Zips Pvt. Ltd. ** | 2082500 | 0.95 |
| Alpha Zippers Pvt. Ltd. ** | 2275000 | 1.03 |
| Balaji Zippers Pvt. Ltd. ** | 3375000 | 1.53 |
| Fancy Zippers Pvt. Ltd. ** | 2068750 | 0.94 |
| SKK Zippers Pvt. Ltd. ** | 4175000 | 1.90 |
| Maruthi Fasteners Pvt. Ltd. ** | 2068750 | 0.94 |

* entire holding has been pledged earlier.
** part of the holding has been pledged

**For, Samruddhi Investors Services Private Limited**

Director

**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) | Sanghi Industries Limited |
| Name of the Promoter(s) on whose shares encumbrance was created/ invoked/ released (tick the relevant one) | M/s Samruddhi Investors Services Pvt. Ltd. and others constituting the Promoter Group |
| Date of reporting | 17/02/2012 |
| Names of the stock exchanges where the shares of the target company are listed | Bombay Stock Exchange Limited and National Stock Exchange of India Limited |

Details of the promoters' holding:
(The term "event" indicates creation/ invocation/ release of encumbrance, as the case may be )

| Promoter (s) or PACs with him | Pre Event Holding | | Details of events pertaining to encumbrance | | Post even holding (encumbered shares to be excluded) | | (*) Details of encumberance (pledge/lien or others give details |
|---|---|---|---|---|---|---|---|
| Names | Number | % of total share capital | Type – creation / invocation / release | Date (s) | Number | % of total share capital | |
| Samruddhi Investors Services Private Limited<br><br>Refer Annexure attached for other Promoter Group holding | Nil | Nil | Creation | 15/02/2012 | Nil | Nil | Pledge of 10998950 equity shares in favor of Motial Oswal Financial Services Ltd. |

(*) Details shall include the details regarding the person(s) on whose favour the encumbrance has been created and other important features of such encumberance.

For, Samruddhi Investors Services Private Limited

Director

**Annexure**

| Name of Promoter/PAC with him | Pre-Event Holding | | Details of Event pertaining to encumbrance | Post event holding (encumbered shares to be excluded) | | | Details of encumbrance (pledge/lien or others) give details |
|---|---|---|---|---|---|---|---|
| **Individuals** | Number | % of total share capital | Type - Creation/ invocation / release | Date(s) | Number | % of total share capital | |
| Sri Ram Sharan Sanghi * | 187000 | 0.09 | Nil | NA | Nil | NA | Refer Notes below |
| Sri Anand Prakash Sanghi * | 187000 | 0.09 | Nil | NA | Nil | NA | ..do.. |
| Sri Sudhir Sanghi * | 187000 | 0.09 | Nil | NA | Nil | NA | ..do.. |
| Sri Ravi Sanghi ** | 3012500 | 1.37 | Nil | NA | 1825500 | 0.83 | ..do.. |
| Sri Gireesh Sanghi** | 2807900 | 1.28 | Nil | NA | 2620900 | 1.19 | ..do.. |
| Smt. Kamala Rani Sanghi * | 140250 | 0.06 | Nil | NA | Nil | NA | ..do.. |
| Smt. Anjana Sanghi * | 140250 | 0.06 | Nil | NA | Nil | NA | ..do.. |
| Smt. Usha Sanghi * | 140250 | 0.06 | Nil | NA | Nil | NA | ..do.. |
| Smt. Anita Sanghi ** | 1020200 | 0.46 | Nil | NA | 879950 | 0.40 | ..do.. |
| Smt. Alka Sanghi** | 1074150 | 0.49 | Nil | NA | 933900 | 0.42 | ..do.. |
| Sri Anand Sanghi (HUF) * | 7866250 | 3.58 | Nil | NA | Nil | NA | ..do.. |
| Sri Sudhir Sanghi (HUF) * | 7866000 | 3.58 | Nil | NA | Nil | NA | ..do.. |
| Sri Ravi Sanghi (HUF) * | 7866000 | 3.58 | Nil | NA | Nil | NA | ..do.. |
| Sri Gireesh Sanghi (HUF) * | 7866000 | 3.58 | Nil | NA | Nil | NA | ..do.. |
| Miss. Swati Sanghi * | 343750 | 0.16 | Nil | NA | Nil | NA | ..do.. |
| Miss Pooja Sanghi * | 343750 | 0.16 | Nil | NA | Nil | NA | ..do.. |
| Miss. Ekta Sanghi * | 343750 | 0.16 | Nil | NA | Nil | NA | ..do.. |
| Miss Aarti Sanghi * | 343750 | 0.16 | Nil | NA | Nil | NA | ..do.. |
| Sri Amit Sanghi * | 5279600 | 2.40 | Nil | NA | Nil | NA | ..do.. |
| Sri Siddharth Sanghi * | 5279600 | 2.40 | Nil | NA | Nil | NA | ..do.. |
| Sri Aditya Sanghi ** | 2889500 | 1.31 | Nil | NA | 250000 | 0.11 | ..do.. |
| Sri Alok Sanghi ** | 2889500 | 1.31 | Nil | NA | 250000 | 0.11 | ..do.. |
| Sri Gaurav Sanghi * | 2639500 | 1.20 | Nil | NA | Nil | NA | ..do.. |
| Sri Ashish Sanghi * | 2639500 | 1.20 | Nil | NA | Nil | NA | ..do.. |

**For, Samruddhi Investors Services Private Limited**

**Director**

**Bodies Corporate**

| | | | | | | |
|---|---|---|---|---|---|---|
| Sanghi Polyesters Limited ** | 5412800 | 2.46 | Nil | NA | 3000000 | 1.36 | ..do.. |
| Sanghi Textiles Pvt. Ltd. * | 5870000 | 2.67 | Nil | NA | Nil | NA | ..do.. |
| SZF Private Limited ** | 9284000 | 4.22 | Nil | NA | 2400000 | 1.09 | ..do.. |
| Sanghi Filaments Pvt. Ltd. ** | 3037500 | 1.38 | Nil | NA | 750000 | 0.34 | ..do.. |
| Sanghi Threads Pvt. Ltd. ** | 2354000 | 1.07 | Nil | NA | 600000 | 0.27 | ..do.. |
| Sanghi Polymers Pvt. Ltd. ** | 4700000 | 2.14 | Nil | NA | 1708136 | 0.78 | ..do.. |
| Sanghi Synthetics Pvt. Ltd. ** | 2275000 | 1.03 | Nil | NA | 600000 | 0.27 | ..do.. |
| Sanghi Poly Zips Pvt. Ltd. ** | 2082500 | 0.95 | Nil | NA | 600000 | 0.27 | ..do.. |
| Alpha Zippers Pvt. Ltd. ** | 2275000 | 1.03 | Nil | NA | 600000 | 0.27 | ..do.. |
| Balaji Zippers Pvt. Ltd. ** | 3375000 | 1.53 | Nil | NA | 600000 | 0.27 | ..do.. |
| Fancy Zippers Pvt. Ltd. ** | 2068750 | 0.94 | Nil | NA | 600000 | 0.27 | ..do.. |
| SKK Zippers Pvt. Ltd. ** | 4175000 | 1.90 | Nil | NA | 600000 | 0.27 | ..do.. |
| Maruthi Fasteners Pvt. Ltd. ** | 2068750 | 0.94 | Nil | NA | 600000 | 0.27 | ..do.. |

* entire holding has been pledged earlier.
** part of the holding has been pledged earlier.

For, Samruddhi Investors Services Private Limited

Director

*Form B*

*Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992*

**[Regulations 13(2), 13(2A) and 13(6)]**

**Details of shares or voting rights held by Director or Officer and his dependents or Promoter or Person who is part of Promoter Group of a listed company, or positions taken in derivatives by Director or Officer of a listed company and his dependents.**

| Name, PAN NO. & Address of Promoter /Person who is part of Promoter Group / Director / Officer | Date of assuming office of Director / Officer OR Date of becoming Promoter / part of Promoter Group | No.& % of shares/voting rights held at the time of becoming Promoter/part of Promoter Group/Director/ Officer. | Date Of intimation to company | Mode of acquisition( market purchase/public/rights /preferential/offer etc.) | Trading member through whom the trade was executed with SEBI Registration No.of the TM | Exchange on which the trade was executed | Buy quantity | Buy value |
|---|---|---|---|---|---|---|---|---|
| Samruddhi Investors Services Pvt. Ltd.<br>PAN No. AAOCS0785M<br>10th Floor, Kataria Arcade,<br>Off. S G Highway, Post Makarba,<br>Ahmedabad - 380 051 | 15/02/2012 | 10998950<br>Equity shares of Rs. 10/- each<br>5% | 17/02/2012 | Market Purchase | Motilal Oswal Securities Ltd.<br>SEBI Regn. No.<br>IN-DP-CDSL-09-99 | National Stock Exchange of India Limited (NSE) | 10998950 | 192481625 |

*Note: The above table shall be applicable with suitable modifications to disclosures for position taken in derivatives also."*

For, Samruddhi Investors Services Private Limited

Director