

Date: 15.06.2019

To,

Securities and Exchange Board of India
Plot No. C4-A, "G" Block,
Bandra Kurla Complex, Bandra East,
Mumbai – 400051

Sub: Report under Regulation 10(7) of SEBI (Substantial Acquisition of Share and Takeover) Regulation, 2011.

Dear Sir,

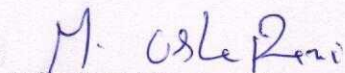
In compliance with the provisions of Regulation 10(7) of SEBI (Substantial Acquisition of Share and Takeover) Regulation, 2011 under exemption Regulation 10(10(a) 9ii) of SEBI (Substantial Acquisition of Share and Takeover) Regulation, 2011. I, Usha Rani Meenavalli, Promoter of Spacenet Enterprises India Limited (The Company) resident of Plot No. 205, Road No 10c, Mp and Mla's Colony, Jubilee Hills, Hyderabad – 500033, hereby submit the disclosure with regard to acquisition of equity shares of Spacenet Enterprises India Limited by me as inter-se transfer of shares, as per gift deed, through an off market transaction, duly signed by me, for your information and record.

Application Fees of Rs. 1.50 lakhs is enclosed vide Demand draft No. 924069 Dated 14th June, 2019 in favor of Securities and Exchange Board of India, payable at Mumbai

Kindly acknowledge the receipts.

Thanking You,

Yours Truly,



Usha Rani Meenavalli

Acquirer

Promoter

Encl: Disclosure

CC:

1. Spacenet Enterprises India Limited, A – Z Elite, 1st Floor, Plot No. 197, Sy. No. 48P, Guttala Begumpet, Madhapur, Hyderabad – 500081
2. National Stock Exchange of India Limited, Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai - 400051

Format under Regulation 10(70 – Report to SEBI in respect of any acquisition made in reliance upon exemption provided for in regulation 10(1)(a0 (ii) of SEBI (Substantial Acquisition of Share and Takeover) Regulation, 2011

1	General Details	
a.	Name, address, telephone no., e-mail of acquirer (S) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond.}	Mrs. Usha Rani Meenavalli Plot No. 205, Road No 10c, Mp And Mlas Colony, Jubilee Hills, Hyderabad-500033 9848386496 meenavalliusha@gmail.com
b.	Whether sender is the acquirer(Y/N)	Yes
c.	If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization)	Not Applicable
d.	Name, address, Tel no. and e-mail of sender, if sender is not the acquirer	Not Applicable
2	Compliance of Regulation 10(7)	
a.	Date of Report	14.06.2019
b.	Whether report has been submitted to SEBI within 21 working days from the date of acquisition	Yes
c.	Whether the report is accompanied with fees as required under Regulation 10(7)	Yes, The applicable fees of Rs. 1,50,000/- vide Demand Draft No. 924069 Dated. 14 th June, 2019 in favour of Securities and Exchange Board of India, payable at Mumbai.
3	Compliance of Regulation 10(5)	
a.	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed at least 4 working days before the date of the proposed acquisition.	Yes, the intimation was sent 4 days before the date of acquisition i.e 03.06.2019 under regulation 10(5). Copy of the same is attached as an Annexure 'A'
b.	Date of Report	27.05.2019
4	Compliance of Regulation 10(6)	
a.	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed within 4 working days of the acquisition.	Yes, report has been filed on 03.06.2019 with the Stock Exchange i.e within 4 days after the date of acquisition. Copy of the same is attached as Annexure 'B'
b.	Date of Report	03.06.2019
5	Details of the Target Company	
a.	Date of acquisition	03.06.2019
b.	Name of the Stock Exchange(s) where the shares of the TC are listed	National Stock Exchange of India Limited
6	Details of acquisition	
a.	Date of acquisition	03.06.2019
b.	Acquisition price per share (in Rs.)	Nil. Inter-se Transfer of shares, as per gift deed

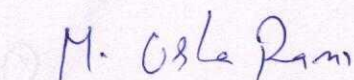
M. Usha Rani

	c.	Regulation which would have been triggered off, had the report not been filed under Regulation 10(7), whether Regulation 3(1), 3(2), 4 or 5	Regulation 3 and 4			
	d.	Shareholding of acquirer(s) and PAC individually in TC (in terms of no. & as a percentage of the total share /voting capital of the TC(*))	Before the acquisition		After the acquisition	
			No. of Shares	% w.r. t total share capital of TC(*)	No. of Shares	% w.r. t total share capital of TC(*)
		Name(s) of the acquirer(s)				
		Usha Rani Meenavalli	3226360	6.58	6480946	13.22
	e.	Shareholding of seller/s in TC (in terms of no. & as a percentage of the total share/voting capital of the TC	Before the acquisition		After the acquisition	
			No. of Shares	% w.r. t total share capital of TC(*)	No. of Shares	% w.r. t total share capital of TC(*)
		Name(s) of the Seller(s)				
		Venkat Srinivas Meenavalli	3254586	6.64	---	---
7	Information specific to the exemption category to which the instant acquisition belongs – Regulation 10(1)(a)(ii)					
	a.	Provide the names of the seller (s)	Venkat Srinivas Meenavalli			
	b.	Specify the relationship between the acquirer(s) and the seller (s)	Wife and Husband			
	c.	Shareholding of the acquirer and the seller/s in the TC during the three years prior to the proposed acquisition	Year – 1 2016-17	Year – 2 2017-18	Year – 3 2018-19	
		Acquirer(s) (*)				
		Usha Rani Meenavalli	3226360	3226360	3226360	
		Sellers(s)(*)				
		Venkat Srinivas Meenavalli	3245586	3245586	3245586	
	d.	Confirm that the acquirer(s) and the seller/s have been named promoters in the shareholding pattern filed by the target company in terms of the Listing Regulation or the Takeover Regulations. Provide copies of such filings under the listing agreement or the Takeover Regulations.	Yes, Shareholding Pattern of Spacenet Enterprises India Limited is attached as an Annexure 'C'.			
	e.	If shares of the TC are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	Not Applicable			

M. Usha Rani

f.	If shares of the TC are infrequently traded, the price of such shares as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	The shares are being transferred as per Gift deed through and off market transaction.
g.	Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (e) or 9f) above as applicable	Not Applicable. The shares are being transferred as per Gift deed through and off market transaction.
h.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed	27.05.2019
i.	Whether the acquirers as well as sellers have complied with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). If yes, specify applicable regulation/s as well as date on which the requisite disclosures were made along with the copies of the same	Yes, Copies of the disclosure under Regulation 30(2), 29 (1) and 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations 2011 filed with Stock Exchange is attached herewith as an Annexure 'D'.
J	Declaration by the acquirer that all the conditions specified under regulation 10(1) (a) (ii) with respect to exemptions has been duly complied with	I Usha Rani Meenavalli hereby confirmed that, all the conditions specified under regulation 10(1) (a) (ii) with respect to exemption have been duly complied with.

We hereby declare that the information provided in the instant report is true and nothing has been concealed there from.



Usha Rani Meenavalli

Acquirer

Date: 14.06.2019

Place: Hyderabad

CC:

1. Spacenet Enterprises India Limited, A – Z Elite, 1st Floor, Plot No. 197, Sy. No. 48P, Guttala Begumpet, Madhapur, Hyderabad – 500081
2. National Stock Exchange of India Limited, Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai – 400051

(*) In case, percentage of shareholding to the total capital is different from percentage of voting rights, indicate percentage of shareholding and voting rights separately.

27 May, 2019

To
The Manager
Listing Department
National Stock Exchange of India Limited
Plot No. C/1, G Block,
Bandra –Kurla Complex
Bandra (East)
Mumbai – 400 051.
Trading Symbol: SPCENET

Annexure - 'A'

Dear Sir,

SUB: Disclosure of Inter-se Transfer of Shares between the Promoters/Promoters group in accordance with Regulation 10(5) of SEBI (SAST) Regulation, 2011.

Pursuant to the Regulation 30 read with Schedule III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Regulation 3 of SEBI (Prohibition of Insider Trading) Regulation 2015, we would like to inform you that the Company has received an information from the following person that inter se transfer of shares amongst themselves is in process through off market transaction by way of Gift deed.

The detail of the same is as under:

Date of Transaction	Name of the person (belongs to promoter group) Transferor/Donar	Name of the Transferee / Donee	No of Shares proposed to be transferred by way of Gift	% of holding
03.06.2019	Venkat Srinivas Meenavalli	Usha Rani Meenavalli	3254586	6.64%

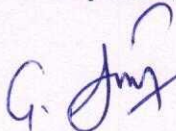
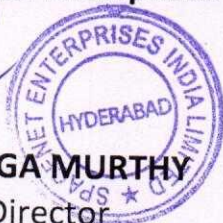
This being an inter se transfer of shares amongst Promoter Group, the same falls within the exemption {under Regulation 10(1) (a) (i) and 10 (1) (a) (ii) provided under SEBI (SAST) Regulation, 2011. This is in nature of transfer of shares through an off market transaction amongst promoters.

The Aggregate holding of the Promoter and Promoter Group before and after the above inter se transaction remains the same.

In this connection necessary disclosure under Regulation 10(5) for the above said acquisition in prescribed format, as submitted by the Acquirer is enclosed herewith for your kind information and records.

Yours Truly,

For **Spacenet Enterprises India Limited**

GADDI LINGA MURTHY

Executive Director

(Din: 02605861)

27May, 2019

To
The Manager
Listing Department
National Stock Exchange of India Limited
Plot No. C/1, G Block,
Bandra -Kurla Complex
Bandra (East)
Mumbai - 400 051.
Trading Symbol: SPCENET

Dear Sir,

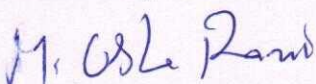
SUB: Inter-se Transfer of Shares amongst the Promoters through an off Market transaction.

Ref: Disclosure pursuant to Regulation 10(5) of SEBI (Substantial Acquisition of shares and Takeover) Regulation 2011.

In compliance with the provisions of Regulation 10(1) (a) (i) read with regulation 10(5) of SEBI (Substantial Acquisition of shares and Takeover) Regulation 2011, I, Usha Rani Meenavalli, Promoter, of Spacenet Enterprises India Limited, hereby submit the disclosure with regard to proposed acquisition of Equity Shares of Spacenet Enterprises India Limited by me as inter-se transfer of shares, by way of gift deed, through an off market transaction, duly signed by me, for your information and record.

Thanking you,

Yours faithfully,


Usha Rani Meenavalli
(Acquirer)
Promoter

Format for Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1	Name of the Target Company (TC)	SPACENET ENTERPRISES INDIA LIMITED
2	Name of the acquirer(s)	USHA RANI MEENAVALLI
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	YES, Mrs. Usha Rani Meenavalli is one of the Promoter of Target Company.
4	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	VENKAT SRINIVAS MEENAVALLI
	b. Proposed date of acquisition	ON OR AFTER 03-JUNE-2019
	c. Number of shares to be acquired from each person mentioned in 4(a) above	32,54,586 EQUITY SHARES
	d. Total shares to be acquired as % of share capital of TC	6.64%
	e. Price at which shares are proposed to be acquired	GIFT (HENCE NO CONSIDERATION)
	f. Rationale, if any, for the proposed transfer	NIL
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	10(1) (a) (i) (ii) – The acquirer is a immediate relative (wife) of Venkat Srinivas Meenavalli and also is promoter of the TC prior to this transaction.
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.	Not Applicable
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.	Not Applicable.
9.	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)	DECLARATION: The Acquirer declares that the transferor and transferee will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997).

M. Usha Rani

10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	DECLARATION: The Acquirer declares that all the conditions specified under regulation 10(1)(a) with respect to exemptions 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
	a. Acquirer(s) and PACs (other than sellers)(*)	32,26,360	6.58%	64,80,946	13.22%
	b. Seller (s)	32,54,586	6.64%	00	00

Note:

- (*) Shareholding of each entity may be shown separately and then collectively in a group.
- The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.

Date : 27-May-2019

Place : Hyderabad

M. Usha Rani
USHA RANI MEENAVALLI

27May, 2019

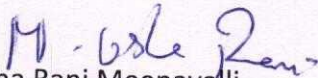
To
The Manager
Listing Department
National Stock Exchange of India Limited
Plot No. C/1, G Block,
Bandra -Kurla Complex
Bandra (East)
Mumbai - 400 051.
Trading Symbol: SPCENET

Dear Sir,

I, Undersigned here undertake and confirm as under with respect to proposed inter se transfer of shares in terms of Regulation 10(10(a) (i) & 10(1) (a)(ii) of SEBI (SAST) Regulations, 2011 and subsequent amendments thereto that:

1. I propose to acquire 3254586 Equity Shares of Spacenet Enterprises India Limited from Mr. Venakt Srinivas Meenavalli as inter-se-transfer of shares between promoters, as per gift deed, through an off market transaction.
2. The transferor and transferee have complied with the applicable provisions of Chapter II of SEBI (SAST) Regulations, 1997 and Chapter V of SEBI (SAST) Regulations, 2011.
3. All the applicable conditions as mentioned in Regulation 10(1)(a) of SEBI (SAST) Regulations, 2011 with respect to exemption have been duly complied with.

Yours Truly,


Usha Rani Meenavalli
Acquirer
Promoter

03 June, 2019

Annexure - B

To
The Manager
Listing Department
National Stock Exchange of India Limited
Plot No. C/1, G Block,
Bandra -Kurla Complex
Bandra (East)
Mumbai - 400 051.
Trading Symbol: SPCENET

Dear Sir,

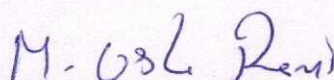
SUB: Disclosure under Regulation 10(6) of SEBI (SAST) Regulation, 2011.

In terms of disclosure under Regulation 10(6) SEBI (Substantial Acquisition of Share and Takeover) Regulation, 2011

I, Usha Rani Meenavalli, Promoter, of Spacenet Enterprises India Limited (The Company) resident at Plot No. 205, Road No. 10c, Mp & Mla's Colony, Jubilee Hills, Hyderabad - 500033, hereby submit the disclosure with regard to acquisition of equity shares of Spacenet Enterprises India Limited by me as inter-se transfer of shares, as per gift deed, through an off market transaction, duly signed by me, for your information and record.

Thanking you,

Yours Truly,


Usha Rani Meenavalli

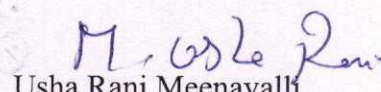
Acquirer

Promoter

Format for Disclosures under Regulation 10(6) –Report to Stock Exchanges 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)	Spacenet Enterprises India Limited Symbol: SPCENET			
	Name of the acquirer(s)	Mrs. Usha Rani Meenavalli			
3.	Name of the stock exchange where shares of the TC are listed	National Stock Exchange of India Limited			
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Inter-se transfer of 3254586 from Mr. Venkat Srinivas Meenavalli to Mrs. Usha Rani Meenavalli as per gift deed.			
5.	Relevant regulation under which the acquirer is exempted from making open offer.	Regulation 10(1)(a) (i) and 10(1)(a)(ii) of SEBI (SAST) Regulation, 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 of proposed acquisition was required to be made under regulation 10(5). Yes, declaration under Regulation 10(5) was made within the stipulated time specified under the SEBI (SAST) Regulation. 27.05.2019			
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	Mr. Venkat Srinivas Meenavalli		Yes	
	b. Date of Proposed acquisition	03.06.2019			
	c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	3254586 Equity Shares			
	d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	3254586 Equity Shares (6.64)			
	e. Price at which shares are proposed to be acquired / actually acquired	Nil			
8.	Shareholding details	Pre-Transaction		Post-Transaction	
		No. of shares held	% w.r.t total share capital of TC	No. of shares held	% w.r.t total share capital of TC
	a Each Acquirer / Transferee(*)	3226360	6.58%	6480946	13.22%
	b Each Seller / Transferor	3254586	6.64%	000	

Date: 03/05/2019
Place: Hyderabad


Usha Rani Meenavalli
Acquirer (Promoter)

1. Name of Listed Entity: Spacenet Enterprises India Limited
2. Scrip Code/Name of Scrip/Class of Security: SPACENET
3. Share Holding Pattern Filed under: 31b
4. Share Holding Pattern as on : 31-Mar-2019
5. **Declaration:** The Listed entity is required to submit the following declaration to the extent of submission of information:-

S. No.	Particulars	Yes/No
1	Whether the Listed Entity has issued any partly paid up shares?	No
2	Whether the Listed Entity has issued any Convertible Securities?	No
3	Whether the Listed Entity has any shares against which depository receipts are issued?	No
4	Whether the Listed Entity has any shares in locked-in?	No
5	Whether any shares held by promoters are pledge or otherwise encumbered?	No
6	Whether the Listed Entity has issued any differential Voting Rights?	No
7	Whether the Listed Entity has issued any Warrants ?	No

Table I - Summary Statement holding of specified securities

Category (I)	Category of shareholder (II)	Nos. of share holders (III)	No. of fully paid up equity shares held (IV)	No. of Partly paid-up equity shares held (V)	No. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII)	Number of Voting Rights held in each class of securities (IX)			No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI) = (VII)+(X)	Number of Locked in shares (XII)	Number of Shares pledged or otherwise encumbered (XIII)	Number of equity shares held in dematerialized form			
								Class eg: X	Class eg: y	Total								
																Total as a % of (A+B+C2)	Total as a % of (A+B+C)	Total as a % of (A+B+C)
A	Promoter & S	9305050	0	0	0	930505	18.98	93050	930	18.98	0	0.00	0	9305050				

Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

Category & Name of the Shareholders (I)	PAN (II)	No. of shareholder (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding % calculated as per SCRR, 1957 (VIII)	Number of Voting Rights held in each class of securities (IX)				No. of Shares Underlying Outstanding convertible securities (X)	Shareholding % assuming full conversion of securities (XI) = percentage of diluted share capital (XII) = (VII)+(X) as a % of A+B+C2	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)	
								No of Voting Rights			Total as a % of Total Voting rights			No. (a)	As a % of total Shares held (b)	No. (a)	As a % of total shares held (b)		
								Class X	Class Y	Total									
1	Indian	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	9305050		
a	Individuals/Hindu undivided Family	5	930500	0	0	930500	18.98	930500	0	930	18.98	0	0.00	0	0.00	0	0	9305050	
	MEENAVALI KRISHNA MOHAN		50			50		50		0									
			807860		0	807860	0.16	807860		807	0.16	0	0.00	0	0.00			80786	
			744660		0	744660	0.15	744660		744	0.15	0	0.00	0	0.00			74466	
			325450		0	325450	6.64	325450		325	6.64	0	0.00	0	0.00			3254586	
	MEENAVALI VENKATA SRINIVAS		86			86		86		458									
	UMA KUNAREDDY		266880		0	266880	5.44	266880		266	5.44	0	0.00	0	0.00			2668852	
	MEENAVALI USHA RANI		52		0	52		52		885									
			322630		0	322630	6.58	322630		322	6.58	0	0.00	0	0.00			3226360	
			60			60		60		636									
b	Central Government/		0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	0	0	0	



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Table III - Statement showing shareholding pattern of the Public shareholder

Category & Name of the Shareholders (I)	PAN (II)	Nos. of shareholder older (III)	No. of fully paid up equity share s held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held VII = IV+V+VI	Sharehol ding % calculate d as per SCRR, 1957 As a % of (A+B+C2) VIII	Number of Voting Rights held in each class of securities (IX)				No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Total shareholdin g, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerializ ed form (XIV)
								No of Voting Rights			Total as a % of Total Voting rights			No. (a)	As a % of total Shares held (b)	No. (No. of shares held applicable)	As a % of total shares held (b)	
								Class X	Class Y	Tot al								
1	Institutions	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	0	0	
a	Mutual Funds/	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00		0	
b	Venture Capital Funds	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00		0	
c	Alternate Investment Funds	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00		0	
d	Foreign Venture Capital Investors	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00		0	
e	Foreign Portfolio Investors	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00		0	
f	Financial Institutions/Banks	1	2832492	0	0	2832492	5.78	28324092	283240	2832492	0	5.78	0	0.00			2832492	
	ALBULA INVESTMENT FUND LIMITED	1	2832492	0	0	2832492	5.78	28324092	283240	2832492	0	5.78	0	0.00			2832492	
g	Insurance Companies	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00		0	
h	Provident Funds/Pension Funds	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00		0	



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BAREET COMMODITY TRADE PRIVATE LIMITED	1	16637058	0	1663758	3.39	16637058	0	1663758	3.39	0	0.00			1663758
Sub-Total (B)(3)	17845	368790348	0	36879348	75.24	368790348	0	36879348	75.24	0	0.00			36853437
Total Public Shareholding (B)= (B)(1)+(B)(2) +(B)(3)	17846	397110840	0	39711840	81.02	397110840	0	39711840	81.02	0	0.00			39685929



Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder

Category & Name of the Shareholders (I)	PAN (II)	No. of share holder (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total no. shares held (VII) = (IV)+(V)+(VI)	Shareholding % calculated as per SCRR, 1957 (A+B+C2) (VIII)	Number of Voting Rights held in each class of securities (IX)			No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Total shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)	
								No of Voting Rights					As a % of total Shares held (Not applicable)	As a % of total share s held (Not applicable)	No. (No t ap pli ca ble)	As a % of total share s held (Not applicable)	No. (No t ap pli ca ble)	
								Class X	Class Y	Total								
1	Custodian/DR Holder	0	0	0	0	0	0.00	0	0	0	0.00	0.00	0	0.00	0	0	0	
2	Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014)	0	0	0	0	0	0.00	0	0	0	0.00	0.00	0	0.00	0	0	0	
	Total Non-Promoter- Non Public Shareholding (C)= (C)(1)+(C)(2)	0	0	0	0	0	0.00	0	0	0	0.00	0.00	0	0.00	0	0.00	0	



Table II- Unclaim Details

Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.
No. of shareholders
No of share held



Table III- Unclaim Details

Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.	
No. of shareholders	No of share held

Table III- Person in Concert

Details of the shareholders acting as persons in Concert including their Shareholding			
Name of shareholder	Name of PAC	No. of share	Holding %



03 June, 2019

To
The Manager
Listing Department
National Stock Exchange of India Limited
Plot No. C/1, G Block,
Bandra -Kurla Complex
Bandra (East)
Mumbai - 400 051.
Trading Symbol: SPCENET

Annexure - D

Dear Sir,

SUB: Disclosure for intimation received from Mrs. Usha Rani Meenavalli for acquisition of equity shares of the Company.

We have received intimation from Mrs. Usha Rani Meenavalli (Promoter) of the Company pursuant to regulation 7(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 regarding acquisition of 3254586 no. of equity shares comprising 6.64 % of the paid up share capital of the Company.

After the said acquisition the total shareholding of the Promoter is 6480946 shares comprising 13.22 % of the paid up share capital of the Company.

In this regard we are submitting herewith the disclosure received from Mrs. Usha Rani Meenavalli pursuant to regulation 7(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.

This is for your information and record.
Kindly acknowledge the receipt of the same.
Thanking you,

Yours Truly,
For **Spacenet Enterprises India Limited**


GADDI LINGA MURTHY
Executive Director
(Din: 02605861)



03 June, 2019

To
The Manager
Listing Department
National Stock Exchange of India Limited
Plot No. C/1, G Block,
Bandra -Kurla Complex
Bandra (East)
Mumbai - 400 051.
Trading Symbol: SPCENET

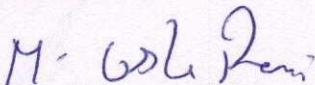
Dear Sir,

SUB: Disclosure under Regulation 29(1) & 29(2) of SEBI (Substantial Acquisition of Share and Takeover) Regulation, 2011.

With reference to the aforementioned subject, please find enclosed herewith the disclosure as per Regulation 29(1) & 29 (2) of SEBI 9 Substantial Acquisition of Share and Takeover) Regulation, 2011, I, Usha Rani Meenavalli , Promoter, of Spacenet Enterprises India Limited (The Company) resident at Plot No. 205, Road No. 10c, Mp & Mla's Colony, Jubilee Hills, Hyderabad - 500033, hereby submit the disclosure with regard to proposed acquisition of Equity Shares of Spacenet Enterprises India Limited by me as inter-se transfer of shars, as per gift deed through an off market transaction, duly signed by me, for your information and record.

Thanking you,

Yours faithfully,


Usha Rani Meenavalli
(Acquirer)
Promoter

Format for Disclosures under Regulation 29(1) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	Spacenet Enterprises India Limited Symbol: Spcenet		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Mrs. Usha Rani Meenavalli		
Whether the acquirer belongs to Promoter/Promoter group	Yes, Promoter		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	National Stock Exchange of India Limited		
Details of the acquisition as follows	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 acquirer along with PACs of:			
a) Shares carrying voting rights	3226360	6.58%	6.58%
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	----	----	----
c) Voting rights (VR) otherwise than by equity 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)	----	----	----
e) Total (a+b+c+d)	3226360	6.58%	6.58%
Details of acquisition			
a) Shares carrying voting rights acquired	3254586	6.64%	6.64%
b) VRs acquired otherwise than by equity shares	----	----	----
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying	----	----	----

M. Usha Rani

category) acquired	----	----	----
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	----	----	----
e) Total (a+b+c+/-d)	3254586	6.64%	6.64%
After the acquisition, holding of acquirer along with PACs of:			
a) Shares carrying voting rights	6480946	13.22%	13.22%
b) VRs 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) after acquisition	----	----	----
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	----	----	----
e) Total (a+b+c+d)	6480946	13.22%	13.22%
Mode of acquisition (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer/encumbrance, etc.)	INTER SE TRANSFER AMONGST PROMOTERS THROUGH AN OFF MARKET TRANSACTIN.		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	N.A		
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.	03/06/2019		
Equity share capital / total voting capital of the TC before the said acquisition	49018590		
Equity share capital/ total voting capital of the TC after the said acquisition	49018590		
Total diluted share/voting capital of the TC after the said acquisition	49018590		

Date: 03/06/2019

Place: Hyderabad

M. Usha Rani
Usha Rani Meenavalli
Acquirer

03 June, 2019

To
The Manager
Listing Department
National Stock Exchange of India Limited
Plot No. C/1, G Block,
Bandra -Kurla Complex
Bandra (East)
Mumbai - 400 051.
Trading Symbol: SPCENET

Dear Sir,

SUB: Disclosure for intimation received from Mr. Meenavalli Venkat Srinivas for disposal of equity shares of the Company.

We have received intimation from Mr. Meenavalli Venkat Srinivas (Promoter of the Company) pursuant to regulation 7(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 regarding disposal of 3254586 no. of equity shares comprising 6.64 % of the paid up share capital of the Company.

After the said Mr. Meenavalli Venkat Srinivas will not hold any share capital of the Company.

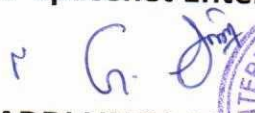
In this regard we are submitting herewith the disclosure received from Mr. Meenavalli Venkat Srinivas pursuant to regulation 7(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.

This is for your information and record.

Kindly acknowledge the receipt of the same.
Thanking you,

Yours Truly,

For **Spacenet Enterprises India Limited**


GADDI LINGA MURTHY

Executive Director

(Din: 02605861)



03 June, 2019

To
The Manager
Listing Department
National Stock Exchange of India Limited
Plot No. C/1, G Block,
Bandra -Kurla Complex
Bandra (East)
Mumbai - 400 051.
Trading Symbol: SPCENET

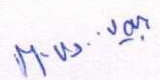
SUB: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Share and Takeover) Regulation, 2011.

Dear Sir,

In terms of disclosure under Regulation 29(2) SEBI (Substantial Acquisition of Share and Takeover) Regulation, 2011, I, Meenavalli Venkat Srinivas, Promoter, of Spacenet Enterprises India Limited (The Company) resident at Plot No. 205, Road No. 10c, Mp & Mla's Colony, Jubilee Hills, Hyderabad - 500033, hereby submit the disclosure with regard to disposal of Equity Shares of the Company, by me as inter-se transfer of shares, as per gift deed , through an off market transaction, duly signed by me, for your information and record.

Thanking you,

Yours Truly,


Meenavalli Venkat Srinivas

Promoter

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

Name of the Target Company (TC)	Spacenet Enterprises India Limited		
Name(s) of the transferor/ disposer and Persons Acting in Concert (PAC) with the transferor	Mr. Meenavalli Venkat Srinivas		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	National Stock Exchange of India Limited		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the disposition under consideration, holding of :			
a) Shares carrying voting rights	3254586	6.64%	6.64%
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	----	----	----
c) Voting rights (VR) otherwise than by shares	----	----	----
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)	3254586	6.64%	6.64%
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold	3254586	6.64%	6.64%
b) VRs acquired /sold otherwise than by 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) acquired/sold	----	----	----
d) Shares encumbered / invoked/released by the acquirer			
e) Total (a+b+c+/-d)	3254586	6.64%	6.64%

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After the acquisition/sale, holding of:				
a) Shares carrying voting rights		0	0	0
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		---	---	---
e) Total (a+b+c+d)		0	0	0
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).		INTER SE TRANSFER AMONGST PROMOTERS THROUGH AN OFF MARKET TRANSACTIN.		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable		03/05/2019		
Equity share capital / total voting capital of the TC before the said acquisition / sale		49018590		
Equity share capital/ total voting capital of the TC after the said acquisition / sale		49018590		
Total diluted share/voting capital of the TC after the said acquisition		49018590		

(*) 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.

Place: Hyderabad

Date: 03/05/2019

M.V.V. Venkat Srinivas