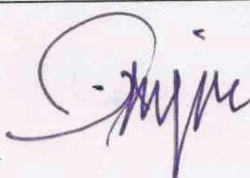
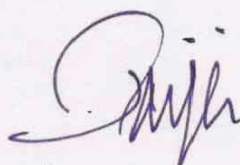


**DISCLOSURES UNDER REGULATION 29(2) OF SEBI (SUBSTANTIAL ACQUISITION OF
SHARES AND TAKEOVERS) REGULATIONS, 2011**

Name of the Target Company (TC)	M/s Surya Roshni Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	M/s Cubitex Marketing Private Limited M/s Shreyansh Mercantile Private Limited (Acquirer(s) / Person Acting in concert with the Promoter) Promoter & Persons Acting in Concert other than the Acquirer - Jai Prakash Agarwal (Promoter) Other Persons Acting in Concert - Pankaj Innvestments Limited - Goel Die Cast Limited - Viksit Trading & Holding Pvt. Limited - Gargiya Finance & Investment Pvt Ltd. - Lustre Merchants Private Limited - Sahaj Tie-up Private Limited - Shirin Commodeal Private Limited - S M Vyapaar Private Limited - (Formerly Lumax Mercantile Private Limited) - Diwakar Marketing Private Limited - Jits Courier & Finance Private Limited		
Whether the acquirer belongs to Promoter/Promoter group	Yes – Person Acting in Concert (With the Promoter)		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	1. The Stock Exchange, Mumbai 2. The National Stock Exchange of India Ltd		
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 (**)
<u>Before the acquisition under consideration, holding of :</u>			
a) Shares carrying voting rights	28056182	64.010	64.010



b) Shares in the nature of encumbrance (pledge / lien / non-disposal undertaking / others)	Nil	Nil	Nil
c) Voting rights (VR) otherwise than by equity shares	Nil	NIL	Nil
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)	Nil	Nil	Nil
e) Total (a+b+c+d)	28056182	64.010	64.010
<u>Details of acquisition/sale</u>			
a) Shares carrying voting rights acquired / sold			
* Person Acting in Concert as an entity - Cubitex Marketing Private Limited - 4,61,000 - Shreyansh Mercantile Private Limited - 1,23,000 (Transfer from existing entity i.e Viksit Trading & Holding Private Limited (4,61,000 shares) and M/s Gargiya Finance & Investment Private Limited (1,23,000 shares) which are part of Persons acting in concert with the Promoter)	584000*	1.332	1.332
less - Viksit Trading & Holding Pvt Ltd -- 4,61,000 - Gargiya Finance & Invest. Pvt Ltd. -- 1,23,000 (Transfer to existing entity Cubitex Marketing Private Limited (4,61,000 shares) and M/s Shreyansh Mercantile Private Limited (1,23,000 shares) which is part of Person Acting in Concert with the Promoter)	-584000	-1.332	-1.332
Net shares/ voting rights acquired /sold	Nil	Nil	Nil
b) VRs acquired otherwise than by equity shares	Nil	Nil	Nil
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.	Nil	Nil	Nil
d) Shares encumbered / invoked / released by the acquirer	Nil	Nil	Nil
Total (a+b+c+/-d)	Nil	Nil	Nil



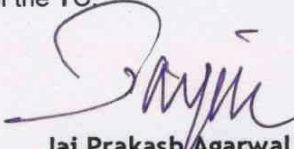
After the acquisition/sale, holding of:			
a) Shares carrying voting rights	28056182	64.010	64.010
b) Shares encumbered with the acquirer	Nil	Nil	Nil
c) VRs otherwise than by equity shares	Nil	Nil	Nil
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	Nil	Nil	Nil
Total (a+b+c+d)	28056182	64.010	64.010
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue /preferential allotment / inter-se transfer etc.)	Inter – se- transfer u/r 10(1)(a)(iv)		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	08.11.2013		
Equity share capital / total voting capital of the TC before the said acquisition/sale	43831250 equity shares (face value Rs. 10/- per share)		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	43831250 equity shares (face value Rs. 10/- per share)		
Total diluted share/voting capital of the TC after the said acquisition/sale	43831250 equity shares (face value Rs. 10/- per share)		

Note:

(*) 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 : New Delhi
Date : 9th November, 2013


Jai Prakash Agarwal
(Promoter of Surya Roshni Limited)