## **DEVARSHI COMMERCIALS LLP**

(REGISTERED WITH LIMITED LIABILITY) LLP IDENTIFICATION NO - AAA-1151

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March 20, 2017

National Stock Exchange of India Limited Exchange Plaza
Plot No. C/1, G Block
Bandra-Kurla Complex
Bandra (East)
Mumbai 400 051.

BSE Ltd Phiroze Jeejeebhoy Towers Dalal Street Mumbai 400 001.

Dear Sirs,

Sub: Report under Regulation 10(6) of the SEBI (Substantial Acquisition of Shares and Takeovers)

Regulations, 2011 {"Takeover Regulations"}

This is with reference to our intimation under Regulation 10(5) of Takeover Regulations submitted on 02.03.2017.

We have already filed a report under Regulation 10(6) of the Takeover Regulations on 15.03.2017 for the following acquisitions made on 09.03.2017 by way of inter se transfer amongst promoter group entities by way of purchase and sale on the block deal window of BSE Ltd:

 Devarshi Commercials LLP and Tattvam Enterprises LLP had acquired 35,54,00,105 equity shares and 4,06,85,783 equity shares of Reliance Industries Limited respectively.

We now enclose a report under Regulation 10(6) of Takeover Regulations for the following acquisitions made on 15.03.2017 by way of inter se transfer amongst promoter group entities by way of purchase and sale on the block deal window of BSE Ltd pursuant to the intimation under Regulation 10(5) of Takeover Regulations on 02.03.2017:

 Tattvam Enterprises LLP and Karuna Commercials LLP have acquired 13,46,16,711 equity shares and 25,40,83,398 equity shares of Reliance Industries Limited respectively.

Kindly take the same on record.

Thanking you,

Yours faithfully.

For Devarshi Commercials LLP (For and on behalf of all Acquirers)

Priyen Shah Authorised Signatory

Encl: as above

## 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   | e of the Target Company (TC)   | Reliance Industries Limited   |  |
|-----|--|--|---|--|
| 2.  |  | e of the acquirer(s)   | i) Tattvam Enterprises LLP  |  |
|     |  |  | ii) Karuna Commercials LLP  |  |
| 3,  |  | e of the stock exchange e shares of the TC are listed  | BSE Ltd.<br>National Stock Exchange of India Ltd                                    | d.   |
| 4.  | Detai<br>ration                              | ils of the transaction including hale, if any, for the transfer/isition of shares.   | Restructuring of promoter holding by group entities by way of purchase ar BSE Ltd.  | inter-se transfer amongst promoter                               |
| 5.  | the  | vant regulation under which acquirer is exempted from ng open offer.   | 10(1) (a) (ii)  |  |
| 6.  | acqu<br>made<br>if so,<br>-whe<br>and<br>the | ther disclosure of proposed isition was required to be under regulation 10 (5) and ther disclosure was made whether it was made within timeline specified under the ations | Yes. The disclosure was made within Regulation 10(5).                               | n the time line specified under                                  |
|     | _  | of filing with the stock   | BSE Ltd 02.03.2017  |  |
|     |  | ange.  | National Stock Exchange of India Ltd  | d. – 02.03.2017  |
| 7.  | Deta   | ils of acquisition   | Disclosures required to be made under regulation 10(5)                              | Whether the disclosures under regulation 10(5) are actually made |
|     | a.<br>i)                                     | Name of the transferor / seller<br>Bhuvanesh Enterprises   |   |  |
|     |  | LLP  | Yes   | Yes<br>Yes   |
|     | ii)<br>iii)                                  | Ajitesh Enterprises LLP<br>Badri Commercials LLP   | Yes<br>Yes  | Yes  |
|     | b.   | Date of acquisition  | On or after 09.03.2017  | 15.03.2017   |
|     | C.   | Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a)  | No. of shares proposed to be acquired as per disclosure made under Regulation 10(5) | No. of shares actually acquired                                  |
|     | i)<br>ii)<br>iii)                            | above Bhuvanesh Enterprises LLP Ajitesh Enterprises LLP Badri Commercials LLP  | 13 46 16 711<br>12 70 41 699<br>12 70 41 699  | 13 46 16 711<br>12 70 41 699<br>12 70 41 699                     |



|    | d.  | Total shares proposed to be acquired / actually acquired              | Shares Propos       | ed to be                  | acquired                            | Shares a             | actually               | acq   | uired                             |  |
|----|-----|---|---------------------|---------------------------|-------------------------------------|----------------------|------------------------|-------|-----------------------------------|--|
|    |     | as a % of diluted share capital of TC                                 | No. of shares       | % of                      | fdiluted                            | No. of shares        | %                      | of    | diluted                           |  |
|    |     |   |                     | share<br>capital<br>of TC | voting capital of TC                |                      | Shar<br>capit<br>of T0 | al    | voting<br>capital of<br>TC        |  |
|    |     |   | 38 87 00 109<br>(#) | 11.98%                    | 12.65%                              | 38 87 00 109<br>(#)  | 11.98                  | %     | 12.65%                            |  |
|    | e.  | Price at which shares are proposed to be acquired / actually acquired |                     | Ja                        | As per Ar                           | nnexure 'A'          |                        |       |                                   |  |
| 8. | Sha | areholding details  | Pre-Tr              | Pre-Transaction           |                                     | Post-Transact        |                        | actio |                                   |  |
|    |     | 3   | No. of shares h     |                           | w.r.t total<br>are capital<br>of TC | No. of share<br>held |                        |       | w.r.t total<br>e capital of<br>TC |  |
|    | a.  | Each Acquirer / Transferee(*)   |                     | ,                         | As per A                            | nnexure 'B'          |                        |       |                                   |  |
|    | b.  | Each Seller / Transferor  |                     |                           |                                     |                      |                        |       |                                   |  |

## Note

The Acquirers and sellers are part of the promoter and promoter group. The aggregate shareholding of the promoter and promoter group prior to the transfers and after the transfers has remain unchanged.

# Refer Annexure A of the intimation dated 02.03.2017 filed under Regulation 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. This quantum represents whole of Item Nos. 5, 6 and 7 of Annexure A.

(\*) Shareholding of each entity shall 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.

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For Devarshi Commercials LLP (For and on behalf of all Acquirers)

Priyen Shah Authorised Signatory

Date: 20.03.2017

Place: Mumbai

## Price at which shares actually acquired

|        |                           |  | Ac           | Actual  |
|--------|---------------------------|--|--------------|---------|
| Sr.No. | Sr.No. Acquirer           | Proposed Price                         | Quantity     | Price   |
| 1      | 1 Tattvam Enterprises LLP | At the market price prevailing on the  | 4 50 76 325  | 1284.75 |
| 2      | 2 Tattvam Enterprises LLP | date of acquisition subject to proviso | 4 61 23 478  | 1284.50 |
| 3      | 3 Tattvam Enterprises LLP | to Regulation 10 (1) (a) and subject   | 4 34 16 908  | 1284.25 |
|        | Total - A                 | to SEBI circular on Block Deals        | 13 46 16 711 |         |
| 4      | 4 Karuna Commercials LLP  |  | 6 32 16 279  | 1284.00 |
| 5      | 5 Karuna Commercials LLP  |  | 6 38 25 420  | 1283.75 |
| 9      | 6 Karuna Commercials LLP  |  | 6 45 32 189  | 1283.50 |
| 7      | Karuna Commercials LLP    |  | 6 25 09 510  | 1283.25 |
|        | Total - B                 |  | 25 40 83 398 |         |
|        | Total - A+B               |  | 38 87 00 109 |         |



Annexure 'B'

|         |                               | Pr                                      | Pre-Transaction        |                            | Pos                   | Post-Transaction       |                            |
|---------|-------------------------------|---|------------------------|----------------------------|-----------------------|------------------------|----------------------------|
| Sr.No.  | Shareholding Details          | ;                                       | % w.r.t total          | tal                        | ,                     | % w.r.t total          | otal                       |
|         |                               | No. of shares<br>held                   | share capital of<br>TC | voting<br>capital of<br>TC | No. of shares<br>held | share capital of<br>TC | voting<br>capital of<br>TC |
| a. Each | a. Each Acquirer / Transferee |   |                        |                            |                       |                        |                            |
| _       | 1 Tattvam Enterprises LLP     | 4 06 85 883                             | 1.25                   | 1.32                       | 17 53 02 594          | 5.40                   | 5.70                       |
| 2       | 2 Karuna Commercials LLP      | 100                                     | 0.00                   | 00.00                      | 25 40 83 498          | 7.84                   | 8.27                       |
|         | O-11                          |   |                        |                            |                       |                        |                            |
| D. Each | D. Each Seller / Transferor   | 0 | 7 4 5                  |                            | 007                   |                        |                            |
|         | 1 Bnuvanesh Enterprises LLP   | 13 46 16 811                            |                        | 4.38                       | 100                   |                        |                            |
| 2       | 2 Ajitesh Enterprises LLP     | 12 70 41 799                            |                        | 4.14                       | 100                   | 0.00                   | 00.00                      |
| 3       | 3 Badri Commercials LLP       | 12 70 41 799                            | 3.92                   | 4.14                       | 100                   | 00.00                  | 00.00                      |
|         |                               |   |                        |                            |                       |                        |                            |

