

DEVARSHI COMMERCIALS LLP

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

Regd. Office: 84-A, Mittal Court, 8th Floor, 224, Nariman Point, Mumbai 400 021.
Tel.: 22022364/65, Fax: 22871046.

March 24, 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 reports under Regulation 10(6) of the Takeover Regulations for the following acquisitions made on 09.03.2017 and 15.03.2017, respectively, 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 on 09.03.2017 (Report filed on 15.03.2017).
- Tattvam Enterprises LLP and Karuna Commercials LLP had acquired 13,46,16,711 equity shares and 25,40,83,398 equity shares of Reliance Industries Limited respectively on 15.03.2017 (Report filed on 20.03.2017).

We now enclose a report under Regulation 10(6) of Takeover Regulations for the following acquisitions made on 20.03.2017 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 submitted under Regulation 10(5) of Takeover Regulations on 02.03.2017:

- Tattvam Enterprises LLP, Srichakra Commercials LLP, Svar Enterprises LLP and Vasuprada Enterprises LLP have acquired 4,04,13,210 equity shares, 34,44,47,537 equity

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shares, 63,69,916 equity shares and 6,16,740 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 of the Target Company (TC)	Reliance Industries Limited	
2.	Name of the acquirer(s)	i) Tattvam Enterprises LLP ii) Srichakra Commercials LLP iii) Svar Enterprises LLP iv) Vasuprada Enterprises LLP	
3.	Name of the stock exchange where shares of the TC are listed	BSE Ltd. National Stock Exchange of India Ltd.	
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Restructuring of promoter holding by inter-se transfer amongst promoter group entities by way of purchase and sale on the block deal window of BSE Ltd.	
5.	Relevant regulation under which the acquirer is exempted from making open offer.	10(1) (a) (ii)	
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.	Yes. The disclosure was made within the time line specified under Regulation 10(5). BSE Ltd. – 02.03.2017 National Stock Exchange of India Ltd. – 02.03.2017	
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	
	i)	Adisesh Enterprises LLP	Yes
	ii)	Pitambar Enterprises LLP	Yes
	iii)	Pavana Enterprises LLP	Yes
	iv)	Kankhal Trading LLP	Yes
	v)	Rishikesh Enterprises LLP	Yes
	vi)	Kamalakar Enterprises LLP	Yes
	vii)	Narahari Enterprises LLP	Yes
	b.	Date of acquisition	On or after 09.03.2017 20.03.2017
	c.	Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	No. of shares proposed to be acquired as per disclosure made under Regulation 10(5) No. of shares actually acquired
	i)	Adisesh Enterprises LLP	4 04 13 210*
	ii)	Pitambar Enterprises LLP	10 48 99 970
	iii)	Pavana Enterprises LLP	3 56 73 300
	iv)	Kankhal Trading LLP	14 34 64 949
	v)	Rishikesh Enterprises LLP	6 04 09 318
	vi)	Kamalakar Enterprises LLP	63 69 916
	vii)	Narahari Enterprises LLP	6 16 740



	d.	Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC	Shares Proposed to be acquired			Shares actually acquired		
			No. of shares	% of diluted		No. of shares	% of diluted	
				share capital of TC \$	voting capital of TC \$		Share capital of TC \$	voting capital of TC \$
		39 18 47 403 (#)	12.08%	12.76%	39 18 47 403 (#)	12.08%	12.76%	
	e.	Price at which shares are proposed to be acquired / actually acquired	As per Annexure 'A'					
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(*)	As per Annexure '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. Out of the total quantum of 8,10,98,993 shares mentioned at Item No. 4 of the said Annexure A, 4,06,85,783 equity shares were transferred on 09-03-2017 (Report under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 was filed on 15-03-2017).

\$ % of share capital and voting capital is based on the date of transaction i.e. 20.03.2017.

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. 8, 9, 10, 11, 12, 13 and balance part of Item No. 4 (i.e. 4,04,13,210 equity shares) 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.

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


Priyen Shah
Authorized Signatory

Date: 24.03.2017

Place: Mumbai



Annexure 'A'

Price at which shares actually acquired

Sr.No.	Acquirer	Proposed Price	Actual	
			Quantity	Price
A	Tattvam Enterprises LLP	At the market price prevailing on the date of acquisition subject to proviso to Regulation 10 (1) (a) and subject to SEBI circular on Block Deals	4 04 13 210	1295.75
	Total -A		4 04 13 210	
B	Srichakra Commercials LLP		5 34 76 280	1295.50
	Srichakra Commercials LLP		5 14 23 690	1295.25
	Srichakra Commercials LLP		1 74 36 450	1295.00
	Srichakra Commercials LLP		1 82 36 850	1294.75
	Srichakra Commercials LLP		4 78 21 350	1294.50
	Srichakra Commercials LLP		4 76 30 850	1294.25
	Srichakra Commercials LLP		4 80 12 749	1294.00
	Srichakra Commercials LLP		6 04 09 318	1293.75
	Total -B	34 44 47 537		
C	Svar Enterprises LLP		63 69 916	1293.50
	Total -C	63 69 916		
D	Vasuprada Enterprises LLP		6 16 740	1293.25
	Total -D	6 16 740		
	Total - A+B+C+D		39 18 47 403	



Annexure 'B'

Sr.No.	Shareholding Details	Pre-Transaction			Post-Transaction		
		No. of shares held	% w.r.t total		No. of shares held	% w.r.t total	
			share capital of TC \$	voting capital of TC \$		share capital of TC \$	voting capital of TC \$
a. Each Acquirer / Transferee							
1	Tattvam Enterprises LLP	17 53 02 594	5.40	5.70	21 57 15 804	6.65	7.02
2	Srichakra Commercials LLP	100	0.00	0.00	34 44 47 637	10.61	11.21
3	Svar Enterprises LLP	100	0.00	0.00	63 70 016	0.20	0.21
4	Vasuprada Enterprises LLP	100	0.00	0.00	6 16 840	0.02	0.02
b. Each Seller / Transferor							
1	Adishes Enterprises LLP	4 04 13 310	1.25	1.32	100	0.00	0.00
2	Pitambar Enterprises LLP	10 49 00 070	3.23	3.41	100	0.00	0.00
3	Pavana Enterprises LLP	3 56 73 400	1.10	1.16	100	0.00	0.00
4	Kankhal Trading LLP	14 34 65 049	4.42	4.67	100	0.00	0.00
5	Rishikesh Enterprises LLP	6 04 09 418	1.86	1.97	100	0.00	0.00
6	Kamalakar Enterprises LLP	63 70 016	0.20	0.21	100	0.00	0.00
7	Narahari Enterprises LLP	6 16 840	0.02	0.02	100	0.00	0.00

\$ % of share capital and voting capital is based on the date of transaction i.e. 20.03.2017.

