

From,
Jayesh Vinodrai Valia
Promoter - Acquirer

1701-B Wing, 17th floor
Pushp Vinod -1 CHS Pushpa
Park, S V Road, Borivali West
Mumbai 400 092

October 13, 2022

To,
Bombay Stock Exchange Ltd,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai -400 001

Dear Sir,

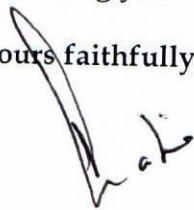
Sub: Disclosure under Regulation 10(7) Substantial Acquisition of Shares and
Takeovers) Regulation 2011
Ref : Company No. 531574

As per under Regulation 10(7) of SEBI Substantial Acquisition of shares and
Takeovers) Regulation 2011, I am enclosing herewith the Disclosure in the
prescribed Form as per SEBI under Regulation 10(7) Substantial Acquisition of
shares and Takeovers) Regulation 2011.

This is for your information and record please.

Thanking you

Yours faithfully,



x
(JAYESH VINODRAI VALIA)
Promoter Acquirer

C.C. Mr. H K Bijlani - Company Secretary
Vas Infrastructure Ltd.
Jwala Estate, Soniwadi,
S V Road, Borivali West
Mumbai 400 092



Format under Regulation 10(7) – Report to SEBI in respect of any acquisition made in reliance upon exemption provided for in regulation 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 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.}
		JAYESH VINODRAI VALIA 1701 PUSHPVINOD -2 B WING , S.V.ROAD , BORIVALI (WEST) MUMBAI-400092. Tel No. 28993092 Email- legal_share@barrelpeople.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)
		N/A
	d.	Name, address, Tel no. and e-mail of sender, if sender is not the acquirer
		N/A
2	Compliance of Regulation 10(7)	
	a.	Date of report
		13-10-2022
	b.	Whether report has been submitted to SEBI within 21 working days from the date of the acquisition
		23-10-2022
	c.	Whether the report is accompanied with fees as required under Regulation 10(7)
		YES
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 atleast 4 working days before the date of the proposed acquisition.
		YES 03-10-2022
	b.	Date of Report
		03-10-2022
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 08-10-2022
	b.	Date of Report
		08-10-2022
5	Details of the Target Company	
	a.	Name & address of TC
		VAS INFRASTRUCTURE LTD

The following abbreviations have been used all through the document: TC stands for 'Target Company', 'Takeover Regulations' stands for 'SEBI(Substantial Acquisition of Shares and Takeover Regulations, 2011)

	b.	Name of the Stock Exchange(s) where the shares of the TC are listed	BSE LTD			
6	Details of the acquisition					
	a.	Date of acquisition	07-10-2022			
	b.	Acquisition price per share (in Rs.)	No sale consideration / value involved			
	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(1) and 3(2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations 2011 -----			
	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) (**) JAYESH VINODRAI VALIA	570300	3.77%	4719171	31.19%
	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) (**) SANGITA JAYESH VALIA MADHAV JAYESH VALIA RAJ JAYESH VALIA HIRAL MADHAV VALIA HEER RAJ VALIA	399671 1157800 447900 1278000 865500	2.64% 7.65% 2.96% 8.45% 5.72%	--- --- --- --- ---	--- --- --- --- ---
			4148871	27.42%		
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)	SANGITA JAYESH VALIA . MADHAV JAYESH VALIA RAJ JAYESH VALIA HIRAL MADHAV VALIA HEER RAJ VALIA			
	b.	Specify the relationship between the acquirer(s) and the seller(s).	Acquirer and Sellers are Promoters of Target Company and have been disclosed as such for the 3 preceding financial years			
	c.	Shareholding of the acquirer and the seller/s in the TC during the three years prior to the proposed acquisition	Year - 1 31/03/2020	Year -2 31/03/2021	Year-3 31/03/2022	
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	Acquirer(s) (*)JAYESH VINODRAI VALIA	570300	570300	570300
	Sellers(s)(* SANGITA JAYESH VALIA MADHAV JAYESH VALIA RAJ JAYESH VALIA HIRAL RAJ VALIA HEER RAJ VALIA	399671 1157800 447900 127800 865500	399671 1157800 447900 1278000 865500	399671 1157800 447900 1278000 865500
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 agreement or the Takeover Regulations. Provide copies of such filings under the listing agreement or the Takeover Regulations.	Yes, Jayesh V. Valia (the Acquirer) and Mrs. Sangeeta J. Valia, Mr. Madhav J. Valia, Mr. Raj J. Valia, Ms. Hiral R. Valia, and Ms. Heer R. Valia (the Sellers) have been named as Promoters / Part of Promoter group in the shareholding patterns filed by the company. Copies of the Shareholding pattern as on 31 st March, 2020, 31 st March, 2021 and 31 st March, 2022 have been attached hereunder		

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.	Rs. 6.80
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.	N.A
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 (f) above as applicable	YES.SINCE THE TRANSACTION IS GIFT OF SHARES, NO SALE CONSIDERATION / VALUE IS INVOLVED.
h.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed	03-10-2022
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 Jayesh V. Valia has made disclosure under Regulation 29(1) and 29(2) of the SEBI(Substantial Acquisition of Shares and Takeovers) Regulations, 2011 on 07.10.2022. Mrs. Sangita J. Valia, Mr. Madhav J. Valia, Mr. Raj J. Valia, Ms. Hiral R. Valia, and Ms. Heer R. Valia have made disclosure under Regulation 29(2) of the SEBI(Substantial Acquisition of Shares and Takeovers)

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	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.	We hereby declare that all the conditions specified under regulation 10(1)(a) (ii) of SEBI(Substantial Acquisition of Shares and Takeovers) Regulations, 2011, with respect to exemptions have been duly complied with.
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I/We hereby declare that the information provided in the instant report is true and nothing has been concealed there from.

NOTE:

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

(**) Shareholding of each entity shall be shown separately as well as collectively



JAYESH V VALIA
PROMOTER
(ACQUIRER)

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