## RADHA DEVI AGRAWAL

D/253, Mahesh Marg, Malaviya Nagar, Jaipur- 302017

Palco Metals Limited 1715, Saiprasad Industrial Park-II, Besides Ramol Police Station, CTM-Ramol Road, Ahmedabad Gujarat.

Re: Disclosure under Regulation 29(1) of the Securities and Exchange Board of India(Substantial Acquisition of Shares and Takeovers) Regulations, 2011("Takeover Code")

I, Radha Devi Agarwal, have sold 190000 equity shares of Palco Metals Limited ("Target Company"), representing 4.75% of the total issued and paid-up equity share capital of the Target Company, on 09/04/2024 vide off market transaction after closing of market hours.

Enclosed is the disclosure as per Regulation 29(1) of the Takeover Code in the prescribed Format.

Kindly take the above on record and acknowledge receipt.

Radha Devi Agrawal

## <u>Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations. 2011</u>

Name of the Target Company (TC)	PALCO METALS LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC)with the acquirer	Acquirer Mr. Badal Kailash Naredi (Nephew of Seller). (Offmarket sale by Aunt to Nephew by way of Gift deed).  PAC Kirankumar Babulal Agrawal Rajkumari Ashokkumar Agrawal Krishna Capital & Securities Limited Krishna Sharebroking Service Private Limited Thakkar Financial Service Private Limited Vital Marketing & Finance Private Limited Narendra Agarwal Kanaiyalal Babulal Agrawal Lalit Kumar Naredi		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC areListed	Bombay Stock Exchange 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(**)
<b>Before the acquisition under consideration, holding of :</b>			
a) Shares carrying voting rights Kirankumar Babulal Agrawal Rajkumari Ashokkumar Agrawal Krishna Capital & Securities Ltd Krishna Sharebroking Ser. Pvt.Ltd. Thakkar Financial Service Pvt Ltd Vital Marketing & Finance Pvt. Ltd Radha Devi Agrawal Kanaiyalal Babulal Agrawal (HUF) Lalit Kumar Naredi	4000 88720 1360000 338120 190000 190000 190000 186200 180000	0.100% 2.218% 34.00% 8.453% 4.75% 4.75% 4.65% 4.50%	0.100% 2.218% 34.00% 8.453% 4.75% 4.75% 4.75% 4.65% 4.50%

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)	2727040	68.18	68.18
	Details of acquisition/sale			
a)	Shares carrying voting rights acquired/sold			
	Kirankumar Babulal Agrawal			
	Rajkumari Ashokkumar Agrawal			
	Krishna Capital & Securities Ltd Krishna Sharebroking Ser. Pvt.Ltd.			
	Thakkar Financial Service Pvt Ltd			
	Vital Marketing & Finance Pvt. Ltd Radha Devi Agrawal	(190000)	(4.75)	(4.75)
	Kanaiyalal Babulal Agrawal (HUF)	(170000)	()	
	Lalit Kumar Naredi Badal Kailash Naredi	190000	4.75	
			4.73	4.75
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			
d)	holding in each category) acquired/sold  Shares encumbered / invoked/released by the			
۵)	acquirer Total (a+b+a+/d)	0	0	0
e)	Total $(a+b+c+/-d)$	U		

After the acquisition/sale, holding of:				
<ul> <li>a) Shares carrying voting rights Kirankumar Babulal Agrawal Rajkumari Ashokkumar Agrawal Krishna Capital &amp; Securities Ltd Krishna Sharebroking Ser. Pvt.Ltd. Thakkar Financial Service Pvt Ltd Vital Marketing &amp; Finance Pvt. Ltd Radha Devi Agrawal Kanaiyalal Babulal Agrawal (HUF) Lalit Kumar Naredi Badal Kailash Naredi</li> <li>b) Shares encumbered with the acquirer c) VRs otherwise than by shares</li> </ul>	4000 88720 1360000 338120 190000 0 186200 180000 <b>190000</b>	0.100% 2.218% 34.00% 8.453% 4.75% 0 4.65% 4.50% 4.75%	0.100% 2.218% 34.00% 8.453% 4.75% 0 4.65% 4.50% 4.75%	
<ul> <li>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</li> <li>e) Total (a+b+c+d)</li> </ul>	2727040	68.18	68.18	
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Off-Market			
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	09/04/2024			
Equity share capital / total voting capital of the TC before the said acquisition / sale	4000000			
Equity share capital/ total voting capital of the TC after thesaid acquisition / sale	4000000			
Total diluted share/voting capital of the TC after the said acquisition	4000000			

- (\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the StockExchange 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. Signature of the acquirer / seller / Authorised Signatory

Radha Devi Agrawal:

**Place: Ahmedabad** 

Date: 12/04/2024