

**Rajat Lal**  
**Managing Director**  
(Sir Shadi Lal Enterprises Limited)

**230, Sector 15-A**  
**NOIDA- 201301 (U.P.)**

The Department of Corporate Affairs  
BSE Limited  
25th Floor, P.J. Towers,  
Dalal Street,  
**Mumbai - 400 001**

February 16, 2024

**Sub: Prior Intimation under regulation 10(5) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for proposed Transfer of shares by way of Gift**

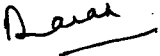
Dear Sir/ Madam,

As due compliance of Regulation 10(5) of the SEBI (SAST) Regulations, 2011, the undersigned being part of the Promoter/Promoter Group of the Company, hereby furnish the **PRIOR INTIMATION** in the specified format under regulation 10(5) in respect of proposed *inter-se* transfer of **1087190** (Ten Lakh Eighty-Seven Thousand One Hundred and Ninety) equity shares of M/s Sir Shadi Lal Enterprises Limited being the Target Company ("TC") in the following manner:

*Inter-se* Transfer (by way of Gift) of **1087190** (Ten Lakh Eighty-Seven Thousand One Hundred and Ninety) equity shares of M/s Sir Shadi Lal Enterprises Limited from Mr. Rajat Lal promoters of the TC to his Wife Smt. Poonam Lal.

The shares are proposed to be transferred by way of "**Gift**" amongst the Immediate Relatives and Promoter /Promoter Group pursuant to exemption provided in Regulation 10(1)(a)(i) and 10(1)(a)(ii) (qualifying person being persons named as promoters in the shareholding pattern filed by the target company for not less than three years prior to the proposed acquisition and also immediate relatives) and there will be no change in the Total Shareholding of the Promoters Group after such *inter-se* transfer of shares of TC.

Thanking You.

  
(Rajat Lal)  
**Promoter of Sir Shadi Lal Enterprises Limited (Transferor)**  
Encl: As Above

**Poonam Lal**

**230, Sector 15-A  
NOIDA- 201301 (U.P.)**

February 16, 2024

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25th Floor, P.J. Towers,  
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*Inter-se* Transfer (by way of Gift) of **1087190** (Ten Lakh Eighty-Seven Thousand One Hundred and Ninety) equity shares of M/s Sir Shadi Lal Enterprises Limited from Mr. Rajat Lal promoters of the TC to his Wife Smt. Poonam Lal.

The shares are proposed to be acquired by way of "**Gift**" amongst the Immediate Relatives and Promoter /Promoter Group pursuant to exemption provided in Regulation 10(1)(a)(i) and 10(1)(a)(ii) (qualifying person being persons named as promoters in the shareholding pattern filed by the target company for not less than three years prior to the proposed acquisition and also immediate relatives) and there will be no change in the Total Shareholding of the Promoters Group after such *inter-se* transfer of shares of TC.

Thanking You.



(Poonam Lal)

**Wife of Mr. Rajat Lal and Promoter of Sir Shadi Lal Enterprises Limited (Acquirer)**

Encl: As Above

**Format for Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1.	Name of the Target Company (TC)	M/s Sir Shadi Lal Enterprises Limited
2.	Name of the acquirer(s)	Mrs. Poonam Lal
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Mr. Rajat Lal
	b. Proposed date of acquisition	23.02.2024
	c. Number of shares to be acquired from each person mentioned in 4(a) above	1087190
	d. Total shares to be acquired as % of share capital of TC	20.708%
	e. Price at which shares are proposed to be acquired	Not Applicable (Transfer by way of Gift)
	f. Rationale, if any, for the proposed transfer	Inter se transfer of shares of Company between immediate relatives
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Regulation 10(1)(a)(i) of SEBI SAST Regulations, 2011
6.	If, frequently traded, volume weighted average preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.	<b>Not Applicable, since the Shares are proposed to be transferred by way of Gift. Therefore, no consideration involved.</b>
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	<b>Not Applicable, since the Shares are proposed to be transferred by way of Gift. Therefore, no consideration involved.</b>
8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable	<b>Not Applicable, since the Shares are proposed to be transferred by way of Gift. Therefore, no consideration involved.</b>
9.	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011  (corresponding provisions of the repealed Takeover Regulations 1997)	<b>Enclosed as "Annexure A".</b>

*Poonam Lal*

10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions have been duly complied with.	Enclosed as "Annexure A"			
11.	Shareholding details	Before the proposed transaction		After the proposed transaction	
		No. of shares / voting rights	% w.r.t total share capital of TC	No. of shares / voting rights	% w.r.t total share capital of TC
a	Acquirer(s) and PACs (other than sellers)(*)				
	M/s Rajendra Lal & Sons (HUF)	244062	4.6488	244062	4.6488
	Mrs. Poonam Lal				
	Mr. Rahul Lal	575486	10.961	1662676	31.67
	Ms. Pooja Lal	5	-	5	-
b	Seller (s)/Transferor	5	-	5	-
	Sh. Rajat Lal	1088190	20.728	1000	0.019

**\*Note:** The partial shareholding of Mr. Rajat Lal in M/s Sir Shadi Lal Enterprises Limited is getting transferred to his Wife Mrs. Poonam Lal by way of gift. The shareholding pattern of Target Company Sir Shadi Lal Enterprises Limited will remain intact before and after the proposed transaction.

*Poonam Lal*

(Poonam Lal)  
(Acquirer)

Date: 16.02.2024

**Poonam Lal**

**230, Sector 15-A  
NOIDA- 201301 (U.P.)**

**Annexure-A  
DECLARATION BY ACQUIRER**

This is with respect to the following proposed acquisition of shares by way of "**Gift**," *inter-se*, within the Immediate relatives and Promoters/ Promoter Group of the Company Viz. Sir Shadi Lal Enterprises Limited (a company incorporated under the Companies Act, 1956, having its registered office at Upper Doab Sugar Mills, Shamli (U.P.) 247776 India:

i. *Inter-se* Transfer (by way of Gift) of **1087190** (20.708%) shares from Sh. Rajat Lal , promoter to Smt. Poonam Lal, being promoters of the TC.

In this regard, the undersigned being the proposed acquirer to the proposed "**Gift**", hereby declare that:

a. the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997}

b. all the conditions specified under regulation 10{1}{a) with respect to exemptions has been duly complied with.



(Poonam Lal)  
(Acquirer)

Place: Noida