



DHP INDIA LIMITED

Corporate Identity Number (CIN) : L65921WB1991PLC051555



Registered Office : 10 Middleton Row, Kolkata 700 071, India
Tel : +91(33) 2229-5735, 2229-7995, Fax : +91(33) 2217-2751
E-mail : info@dhpindia.com

Ref : 19(B)(C)/29274

Dated : 10-03-2021

To

- 1) The Secretary,
The Calcutta Stock Exchange Ltd. [Securities Code No. 14058]
7, Lyons Range, Kolkata – 700 001.
- 2) The Listing Department, Department of Corporate Services,
Bombay Stock Exchange Limited [Securities Code No. 531306]
25, P.J.Towers, Dalal Street, Mumbai – 400 001.

Dear Sir,

RE : ISIN : INE590D01016 – DHP INDIA LIMITED

Subject : Filing of Disclosure received from Acquirer - Asheesh Dabriwal, Promoter under Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 of their after Filing of REPORT TO SEBI for Acquisition of 11,45,100 Equity Shares of Target Company [38.17% of total Capital of TC] on 08-03-2021 in terms of "Inter-se-Transfer" amongst Promoters within Immediate Relative by way of gift from off market transaction- Exempted for Public Announcement and covered u/r.10(1)(a)(i) & (ii) of SEBI (SAST) Regulations, 2011

We have received a disclosure from our Acquirer – Sri Asheesh Dabriwal - Managing Director & Promoter of the Company after their Filing of Final Report to SEBI for Acquisition of 11,45,100 Equity Shares of our Company [38.17% of Total capital of the Company) on 08-03-2021 as per Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, in terms of "Inter-se-transfer amongst promoters" in compliance with provisions of Regulations 10(1)(a)(i) and/or 10(1)(a)(ii) SEBI (SAST) Regulations, 2011, which was executed on 08-03-2021 by way of Off-Market Transaction, as per Memorandum of Gift executed between :-

- (1) Sri Nirmal Kumar Dabriwala, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 9,65,000 Equity Shares [32.17%] of DHP India Limited [Gift from father to son], and
- (2) Smt. Kumkum Dabriwal, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 1,80,100 Equity Shares [6.00%] of DHP India Limited [Gift from mother to son].

The Details of "Acquisition" are as below :-

- i) Date of Acquisition : 08-03-2021
- ii) Number of Shares (% of Shares) Acquisition : 11,45,100 Equity Shares [38.17% of Total Share Capital]
- iii) Offer Price and Regulation etc. covered : Not Applicable – Inter-se-Transfer amongst Promoters by way of Gift with immediate relative –U/r.10(1)(a)(i) & (ii) of SEBI (SAST) Regulations, 2011.
- iv) Mode of Transaction : Off-Market Transfer in Demat Account
- v) Date of Filing of Such Acquisition Report to SEBI : 10-03-2021

We are sending the Attached Letter with Copy of duly filled Full Set of papers & Format U/r. 10(7) of SEBI (SAST) Regulations, 2011 for your information and record.

Yours Faithfully,
For DHP INDIA LIMITED

[CA ASHOK KUMAR SINGH]
Chief Financial Officer

Enclosed : Letter & Copied of Report received U/r. 10(7) of SEBI (SAST) Regulations, 2011



ASHEESH DABRIWAL

2A/3A, Sapphire
13/2, Ballygunge Park Road, Kolkata – 700 019
Phone No : (033) 2229-5735/7995/9626/7929
Email : asheesh@dhpindia.com

Dated : 10-03-2021

To
The Securities & Exchange Board of India,
SEBI Bhavan BKC,
Plot No. C4-A, "G" Block, Bandra-Kurla Complex, Bandra (East),
Mumbai – 400 051. (Maharashtra)

Dear Sir,

RE : ISIN : INE590D01016 – DHP INDIA LIMITED

Subject : Filing of Final Report & Disclosure under Regulation 10(7) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 for Inter-se-Transfer amongst Promoters by way of Gift under Immediate Relative/family through an Off-Market Transaction of 11,45,100 Equity Shares of Target Company [38.17% of Total Capital of TC] along with Payment of Fees of Rs.1,50,000/- by NEFT INB Reference No.IRP1784303 Dt.10/03/2021

I have acquired 11,45,100 Equity Shares (38.17% voting rights of "TC") of DHP India Limited (Target Company) by way of Gift from Parents (Immediate Relative) on off-market transaction by means *inter-se-transfer amongst promoters u/r.10(1)(a)(i) & (ii)* of SEBI (Substantial acquisition of Shares & Takeovers) Regulations, 2011. In this connection, please find the enclosed herewith the followings :-

- (a) NEFT Payment from State Bank of India, Middleton Row, Branch, [SBIN0001122], Kolkata on 10/03/2021, in favour of "Securities and Exchange Board of India" Mumbai of Rs.1,50,000/- (Rupees One Lakh Fifty Thousands Only) on their Bank Account Details :- Bank of India, Bandra-Kurla Complex Branch, Mumbai, A/c. No. 012210210000007 & IFSC Code : BKID 0000122 vide INB Reference No. IRP1784303 Dt.10/03/2021 as per prescribed fees under Regulations 10(7) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011.
- (b) Report in Prescribed Format under Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (6 pages) along with their all ANNEXURES ["A" to "Q"] and all relevant papers and enclosures duly signed.

Please acknowledge receipt and record the same & confirm to us.

Thanking You,


[ASHEESH DABRIWAL]

Acquirer, Promoter & Managing Director [KMP] of DHP India Limited.

Enclosed : As Stated above

- Copy to : 1) Listing Department, Department of Corporate Services,
Bombay Stock Exchange Limited [Securities Code No. 531306]
25, P.J.Towers, Dalal Street, Mumbai – 400 001.
- 2) The Secretary,
The Calcutta Stock Exchange Ltd. [Securities Code No. 14058]
7, Lyons Range, Kolkata – 700 001.
- 3) The Company Secretary-cum-Compliance Officer,
DHP INDIA LIMITED [Target Company], 10, Middleton Row, Kolkata – 700 071.

FORMAT UNDER REGULATION 10(7) - REPORTS TO SEBI IN RESPECT OF ANY ACQUISITION MADE IN RELIANCE UPON EXEMPTION PROVIDED FOR IN REGULATION 10(1)(a)(i) as well as 10(1)(a)(ii) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011

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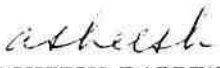
(For Transaction falling under Regulation 10(1)(a)(i) & (ii)- Acquisition through Inter-se Transfer of Shares)

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.}	ASHEESH DABRIWAL, 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata-700 019. E-mail : asheesh@dhpindia.com Telephone No : (33)2229-5735/7995, Fax No : (33)2217-2751
b.	Whether sender is the acquirer (Y/N)	YES
c.	If not, whether the sender is duly authorised by the acquirer to act on his behalf in this regard (enclose copy of such authorisation)	Not Applicable
d.	Name, address, telephone no. and e-mail of the sender, if sender is not the acquirer	Not Applicable
2	Compliance of Regulation 10(7)	
a.	Date of Report	10-03-2021
b.	Whether report has been submitted to SEBI within 21 working days from the date of the acquisition	YES. [Acquisition Dt. 08/03/2021 & Due dt. for filing of report u/r.10(7) to SEBI is 29/03/2021. Report filing date is 10/03/2021, which is within the due date.]
c.	Whether the report is accompanied with fees as required under regulation 10(7)	YES NEFT Payment from State Bank of India, Middleton Row Branch, [SBIN0001122], Kolkata on 10/03/2021, in favour of "Securities and Exchange Board of India" Mumbai of Rs.1,50,000/- (Rupees One Lakh Fifty Thousands only) on their Bank Account Details : Bank of India, Bandra-Kurla Complex Branch, Mumbai, A/c.No.012210210000007 & IFSC Code : BKID 0000122 vide INB Ref.No. IRP1784303 Copy of Advice Enclosed as ANNEXURE -"A"
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, at least 4 working days before the date of the proposed acquisition.	YES The information about the proposed acquisition was given to all SEs where the shares of TC are listed atleast 4 working days in advance u/r. 10(5) by the acquirer as well as the TC. on 01-03-2021 [Proposed Acquisition Dt. 08-03-2021] [Copy of Notice U/r.10(5)-attached as per Annex. - "B"-3 pages]
b.	Date of Report	01-03-2021

Cont. page 2

Date : 10-03-2021

Place : Kolkata


[ASHEESH DABRIWAL]
Acquirer & Promoter

(For Transaction falling under Regulation 10(1)(a)(i) & (ii)- Acquisition through Inter-se Transfer of Shares)

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 after the date of the proposed acquisition.	YES The information about the proposed acquisition was given to all SEs where the shares of TC are listed within 4 working days after the proposed acquisition u/r. 10(6) by the acquirer as well as the TC filed on 09-03-2021 [Acquisition Dt. 08-03-2021] [Copy of Notice U/r.10(6)-attached as per Annex.- "C"-3 pages]
	b. Date of Report	09-03-2021
5	Details of the Target Company (TC)	
	a. Name & Address of Target Company (TC)	DHP INDIA LIMITED [CIN: L65921WB1991PLC051555] 10, Middleton Row, Kolkata - 700071.
	b. Name of Stock Exchange(s) where the shares of the Target Company (TC) are listed.	1) The Calcutta Stock Exchange Ass.Ltd.[Sec.Code-14058] 2) Bombay Stock Exchange Ltd, Mumbai [Sec. Code. 531306]
6	Details of the Acquisition	
	a. Date of Acquisition	08-03-2021
	b. Acquisition Price per share (in Rs.)	Nil. As a gift, as an inter-se-transfer of shares through an off-market transaction between immediate relative amongst promoters [U/r. 10(1)(a)(i) of SEBI Takeover Regulations, 2011] [Copies of both Memorandum of Gift Deed enclosed as Annexure-"D" - 4 pages] However, the Calculated "Offer Price" as per regulation 8(2) of SEBI Takeover Regulations, 2011 on "Frequent Traded" basis Calculated of Rs.396.69 [A certificate from Company along with Calculation Sheet attached as per Annexure-"E"-3 pages]
	c. Regulation which would have been triggered and open offer, had the report not been filed under Regulation 10(7). [Whether Regulation 3(1), 3(2), 4 or 5].	Had the report not been filed under regulation 10(7). None of the regulations of 3(1), 3(2), 4 or 5 would have been triggered off. The Promoters Group held 74.34% in TC before the acquisition and continue to hold 74.34% in TC after the acquisition. The said acquisition of 11,45,100 equity shares representing 38.17 % of the paid-up equity share capital of TC has been done by means of an inter se transfer between the constituents of the Promoters Group as per Reg.10(1)(a)(i).

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Date : 10-03-2021
Place : Kolkata


[ASHEESH DABRIWAL]
Acquirer & Promoter

Continuation of FORMAT UNDER REGULATION 10(7) - REPORTS TO SEBI IN RESPECT OF ANY ACQUISITION MADE IN RELIANCE UPON EXEMPTION PROVIDED FOR IN REGULATION 10(1)(a)(i) as well as 10(1)(a)(ii) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011

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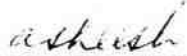
(For Transaction falling under Regulation 10(1)(a)(i) & (ii)- Acquisition through Inter-se Transfer of Shares)

6	Continuing of Details of the Acquisition		
d.	Share holding of acquirer(s) and PAC individually in T. C. (in terms of no. and as a percentage of the total share/voting capital of the T.C.) <u>Name of the Acquirer(s)/PAC</u> Acquirer & Promoter - Asheesh Dabriwal PAC (under Promoters Group)- Anjum Dhandhanian Enterprises where covered under promoters Group :- 1) Dabriwala Constructions Private Limited 2) Dolphin Properties Private Limited	Before the acquisition (one day prior to the date of acquisition) [No of shares & % w.r.t. Total share Capital of TC] i.e. as on 07/03/2021 6,62,600 (22.09 %) 20,000 (0.67 %)	After the acquisition (one day after to the date of acquisition) [No of shares & % w.r.t. Total share Capital of TC] i.e. as on 09/03/2021 18,07,700 (60.26 %) 20,000 (0.67 %)
		[A Certificate from Company attached as Annexure- "F"]	
e.	Share holding of seller/s in T.C. (in terms of no. and as a percentage of the total share/voting capital of the T.C.) <u>Name of the Seller/s</u> 1) Nirmal Kumar Dabriwala - Seller 2) Kumkum Dabriwal - Seller Total of 2 nos. Sellers	Before the acquisition (one day prior to the date of acquisition) [No of shares & % w.r.t. Total share Capital of TC] i.e. as on 07/03/2021 9,65,000 (32.17 %) 1,80,100 (6.00 %) 11,45,100 (38.17 %)	After the acquisition (one day after to the date of acquisition) [No of shares & % w.r.t. Total share Capital of TC] i.e. as on 09/03/2021 NIL [0.00 %] NIL [0.00 %] NIL [0.00 %]
		[A Certificate from Company attached as Annexure- "F"]	
7	Information specific to the exemption category to which the instant acquisition belongs-Regulation 10(1)(a)(i) as well as 10(1)(a)(ii)		
a.	Provide the names of the seller(s)	1) Nirmal Kumar Dabriwala - Seller 2) Kumkum Dabriwal - Seller	
b.	Specify the relationship between the acquirer(s) and the seller(s).	Acquirer - <u>Asheesh Dabriwal</u> is son of the Seller(s) - (1) <u>Nirmal Kumar Dabriwala (Father) and</u> (2) <u>Kumkum Dabriwal (Mother)</u> as per Regulation 10(1)(a)(i) - Immediate Relative [defined in Regulation 2(l)]	
c.	[for claiming exemption u/r.10(1)(a)(i) of SEBI Takeover, Regulations, 2011] Confirm whether the acquirer(s) and seller(s) are "Immediate Relatives" as defined in the Regulation 2(1).	YES. Acquirer (<u>Asheesh Dabriwal</u>) is son of both the Seller(s) <u>Nirmal Kumar Dabriwala & Kumkum Dabriwal</u> as per Regulation 10(1)(a)(i) - Immediate Relative [defined in Regulation 2(1)]	

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Date : 10-03-2021

Place : Kolkata


[ASHEESH DABRIWAL]
Acquirer & Promoter

(For Transaction falling under Regulation 10(1)(a)(i) & (ii)- Acquisition through Inter-se Transfer of Shares)

7	Continuation of Information specific to the exemption category to which the instant acquisition belongs-Regulation 10(1)(a)(i) as well as 10(1)(a)(ii)		
	[for claiming exemption u/r.10(1)(a)(ii) of SEBI Takeover, Regulations, 2011]		
c(1).	Shareholding of the acquirer and the seller/s in the TC during the three years prior to the proposed acquisition.	YEAR - 1 2017-18	YEAR - 2 2018-19
	Acquirer - Asheesh Dabriwal	6,62,600 Eq. Shares	6,62,600 Eq. Shares
	Seller(s) : -(1) Nirmal Kumar Dabriwala	9,65,000 Eq. Shares	9,65,000 Eq. Shares
	Seller(s) : -(2) Kumkum Dabriwal	1,80,100 Eq. Shares	1,80,100 Eq. Shares
	[A Certificate from Company attached as Annexure-"G"]		
c(2).	[for claiming exemption u/r.10(1)(a)(ii) of SEBI Takeover, Regulations, 2011] 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 agreements or the takeover Regulations.	YES. Shareholding Pattern for Last Quarter Ended 31/12/2020 of DHP INDIA LIMITED Filed with Stock Exchanges u/r.31 on 07/01/21 vide Ack.No.0701202112055931.BSE Promoter List enclosed as attached Ann.-"H" with evidence -1 page	
d.	If shares of the T.C. are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceeding the date of issuance of notice regarding the proposed acquisition to the Stock Exchanges where the T.C. is listed	Not Applicable in case of inter-se-transfer by way of Gift with immediate relative amongst promoters - exemption covered u/r.10(1)(a)(i) of SEBI, Takeover Regulations, 2011. However, the shares of the TC are Frequent Traded. The Shares of the TC in BSE from last twelve calendar month from March,2020 to February, 2021 traded as 3,01,159 Equity Shares (more than @10%) and traded as "Frequent Traded" a Certificate from Company enclosed as Annexure-"I" The VWAP (Volume weighted average price) of TC of last sixty trading days preceeding to the date of issuance of notice (01/03/2020) i.e. from 03/12/2020 to 26/02/2021) is Rs.396.69 a Certificate from Company along with Calculation u/r.8(2)(d) of SEBI (SAST) is enclosed as per Annexure -"J" - 2 pages	
e.	If the shares of T.C. are infrequently traded, the price of such shares has determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not Applicable As stated above in Point No. (d) the Shares of T.C. are treated as "Frequently Traded".	

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Date : 10-03-2021
Place : Kolkata


[ASHEESH DABRIWAL]
Acquirer & Promoter

(For Transaction falling under Regulation 10(1)(a)(i) & (ii)- Acquisition through Inter-se Transfer of Shares)

7	Continuation of Information specific to the exemption category to which the instant acquisition belongs-Regulation 10(1)(a)(i) as well as 10(1)(a)(ii)	
	f. Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (d) or (e) above as applicable.	Not Applicable. The shares were transferred as a gift as an inter-se-transfer of shares through an off market transaction. However a Certificate from Company for calculation of "Offer Price" as per regulation 8(2) of SEBI takeover Regulation is attached in Annexure-"E" (3 pages) of Rs.396.69 i.e. on deemed Acquisition Price/Transfer price does not exceeds 25% of the price calculated in (d) or (e) above as applicable.
	g. Date of issuance of notice regarding the proposed acquisition to the Stock Exchanges where the T.C.is listed	01-03-2021
	h. 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.	<p>YES</p> <p>Copies of disclosure under Regulation 29(1)/29(2) of SEBI (SAST) Regulations, 2011 filed with Stock Exchange is attached as Annexure-"K" - (11 pages).</p> <p>Copies of disclosure under Regulation 7(2) read with Regulation 6(2) Continual Disclosure of SEBI (Prohibition of Insider Tradings) Regulations, 2015 send by Acquirer as well as Both Sellers enclosed as per Annexure-"L"-(6 pages)</p> <p>A Declaration as per Table 'A' from Transferee(s)/Acquirer(s) confirming that the transferee(s) have filed the declaration with TC in accordance with Chapter V of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 as well as Chapter II of SEBI (Substantial Acquisition of Shares & takeovers) Regulations, 1997 is enclosed as per Annexure - "M" (2 pages) . The TC has filed the same with all SEs where the shares of TC are listed. Declaration in "Table -D" attached as per Annexure - "O"-(3 Pages).</p> <p>A Declaration as per Table 'B' & "C" from Transferor(s)/Seller(s) confirming the transferor(s) have filed the declaration with TC in accordance with Chapter V of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 as well as Chapter II of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 1997 enclosed as per Annexure - "N" (4 pages) . The TC has filed the same with all SEs where the shares of TC are listed. Declaration in "Table -D" attached as per Annexure - "O"-(3 pages).</p>
	i. Declaration by the acquirer that all the conditions specified under regulation 10(1)(a)(i) with respect to exemptions has been duly complied with.	<p>YES</p> <p>A Declaration as per Annexure -"P" from Acquirer(s) confirming that the all the conditions specified under regulation 10(1)(a)(i) with respect to exemption is attached.</p> <p>The Latest Copy of Audited Annual Accounts of Target Company also enclosed as per Annexure "Q" (Printed Set)</p>

I hereby declare that the information provided in the instant report is true and nothing has been cocealed thereform.

Date : 10-03-2021

Place : Kolkata


[ASHEESH DABRIWAL]

Acquirer & Promoter

Cont. page 6

Continuation of FORMAT UNDER REGULATION 10(7) - REPORTS TO SEBI IN RESPECT OF ANY ACQUISITION MADE IN RELIANCE UPON EXEMPTION PROVIDED FOR IN REGULATION 10(1)(a)(i) as well as 10(1)(a)(ii) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011

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(For Transaction falling under Regulation 10(1)(a)(i) & (ii)- Acquisition through Inter-se Transfer of Shares)

Supporting Documents enclosed :-

Sr.No.	Particulars	Index Number & pages
1)	NEFT Payment from State Bank of India, Middleton Row Branch, [SBIN0001122], Kolkata on 10/03/21, in favour of "Securities and Exchange Board of India", Mumbai of Rs.1,50,000/- (Rupees One Lakh Fifty Thousands Only) on their Bank A/c. Details Bank of India, Bandra-Kurla Complex Branch, Mumbai, A/c.No.012210210000007 & IFSC Code : BKID 000 122 vide INB Reference No. IRP1784303	Annexure "A" (Page-1)
2)	Copy of Disclosure by Acquirer Under Regulation 10(5) of SEBI (SAST) Regulations, 2011	Annexure "B" (Pages 1 to 3)
3)	Copy of Disclosure by Acquirer Under Regulation 10(6) of SEBI (SAST) Regulations, 2011	Annexure "C" (Pages 1 to 3)
4)	Copy of Memorandum of Gift Deed between "Nirmal Kumar Dabriwala" and "Asheesh Dabriwal" and between "Kumkum Dabriwal" and "Asheesh Dabriwal"	Annexure "D" (Pages 1 to 4)
5)	A Certificate from Company with calculation Sheet of "Offer Price" under Regulation 8(2) of SEBI (SAST) Regulations, 2011	Annexure "E" (Pages 1 to 3)
6)	A Certificate from TC for the Pre & Post holdings of Acquirer/Seller(s) from one day prior i.e. 07/03/21, one day after i.e. 09/03/21 & one year prior i.e. 08/03/20, alongwith confirming the Pre & Post holdings of Seller(s)/Transferor(s).	Annexure "F" (Page - 1)
7)	A Certificate from Target Company confirming that the Last Three years holding from the date of acquisition of Transferor(s) as well as Transferee(s) (i.e. 08/03/2018, 08/03/2019, & 08/03/2020) and also confirming that the Transferor(s) as well as Transferee(s) holdings shares of TC for a period of atleast 3 years prior to the dt. of acquisition.	Annexure "G" (Page - 1)
8)	Evidence of Promoters Shareholding of last Quarter Ended - December'2020 filed on 07-01-2021 with BSE [Copy of BSE Printout alongwith Filing Acknowledgement]	Annexure "H" (Page 1)
9)	A Certificate from Company with calculation Sheet of Shares are "Frequent Traded" with BSE from last Twelve Calendar Month	Annexure "I" (Page - 1)
10)	A Certificate from Company with calculation Sheet of Volume-Weighted Average Market price of Shares for last sixty trading days U/r. 8(2)(d) of SEBI (SAST) Regulations, 2011	Annexure "J" (Page 1 & 2)
11)	Copy of Disclosure by Acquirer under Regulation 29(1)/(29(2) as well as Both Sellers under Regulation 29(2) of SEBI (SAST) Regulations, 2011	Annexure "K" (Pages 1 to 11)
12)	Copies of disclosure under Regulation 7(2) read with Regulation 6(2) Continual disclosure of SEBI (Prohibition of Insider Tradings) Regulations, 2015, send to Stock Exchanges by Acquirer as well as both Sellers	Annexure "L" (Pages 1 to 6)
13)	A declaration as per TABLE -A from transferee(s)/acquirer(s) for confirming that the all declaration filed with TC in accordance with Chapter V/Chapter II of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011/1997	Annexure "M" (Pages 1 & 2)
14)	A declaration as per TABLE -B & TABLE -C from transferor(s)/seller(s) for confirming that the all declaration filed with TC in accordance with Chapter V/Chapter II of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011/1997.	Annexure "N" (Pages 1 to 4)
15)	A Certificate from Target Company as per TABLE-D for confirming that the all declaration received from promoters, acquirers, sellers, etc. within stipulated time and the same intimated to all SEs as per stipulated time.	Annexure "O" (Pages 1 to 3)
16)	Declaration by Acquirer for Claiming Exemption u/r.10(1)(a) of SEBI (SAST) Regulations, 2011	Annexure "P" (Page - 1)
17)	Latest copy of Audited Balance Sheet of TC as on 31/03/2020.	Annexure "Q" [Printed Set]

Date : 10-03-2021

Place : Kolkata


[ASHEESH DABRIWAL]
Acquirer & Promoter

SBIAN A

Online Fund Transfer

INB Reference Number

IRP1784303

10-Mar-2021 [12:54 PM IST]

Debit Transaction Status

Processed

Debit Account Details

SBI Account No.	Account Type	SBI Branch	Amount	Commission Amount	Transaction Type	UTR Number
00000035508215036	Savings Account	MIDDLETON ROW	INR1,50,000.00	INR0.00	NEFT	SBIN421069320479

Credit Account Details

Account No.	Bank	Branch	Transfer Type	Amount	Purpose
012210210000007	BANK OF INDIA	BANDRA KURLA COMPLEX	NEFT	1,50,000.00	Fee for Takeover Asheesh

ASHEESH DABRIWAL

o/c

SPEED POST WITH A/D

ANN-B (page 1 of 3)

*Delivered on 04/3/2021
at 14:56*

2A/3A, Sapphire
13/2, Ballygunge Park Road
Kolkata – 700 019

Phone No : (033) 2229-5735/7995/9626/7929

Email : asheesh@dhpindia.com

Dated : 01-03-2021

To

- 1) The Listing Department, Department of Corporate Services,
Bombay Stock Exchange Limited [Securities Code No. 531306]
25, P.J.Towers, Dalal Street, Mumbai – 400 001.
- 2) The Secretary,
The Calcutta Stock Exchange Ltd. [Securities Code No. 14058]
7, Lyons Range, Kolkata – 700 001.
- 3) The Company Secretary-cum-Compliance Officer,
DHP INDIA LIMITED [Target Company], 10, Middleton Row, Kolkata – 700 071.

Dear Sir,

RE : ISIN : INE590D01016 – DHP INDIA LIMITED

Subject : Disclosure under Regulation 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 of Proposed Acquisition Date of 08-03-2021 for Inter-se-transfer of 11,45,100 Equity Shares of Target Company [38.17% of total Capital of TC] between amongst Promoters in Immediate Relative by way of gift from off market transaction- Exempted for Public Announcement and covered u/r.10(1)(a)(i) & (ii) of SEBI (SAST) Regulations, 2011

In compliance with provisions of Regulations 10(1)(a)(i) and/or 10(1)(a)(ii) read with Regulation 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I **Asheesh Dabriwal**, Promoter and Managing Director [KMP] of DHP India Limited [CIN : L65921WB1991PLC051555] ("The Company"), resident of 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata – 700 019, hereby submit the disclosure with regard to **Proposed Acquisition** on 08-03-2021 of 11,45,100 Equity Shares [38.17% of Total Capital of Target Company] of DHP India Limited [target Company] by me, which will an inter-se-transfer of shares, as per Memorandum of Gift executed between :-

- (1) Sri Nirmal Kumar Dabriwala, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 9,65,000 Equity Shares [32.17%] of DHP India Limited [Gift from father to son], and
- (2) Smt. Kumkum Dabriwal, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 1,80,100 Equity Shares [6.00%] of DHP India Limited [Gift from mother to son].

The aforementioned transfer will be by way of an Off-Market Transaction on Proposed Date of Acquisition on 08-03-2021. This is for your information and record.

Thanking You,
Yours Faithfully,

asheesh

[ASHEESH DABRIWAL]

Acquirer, Promoter & Managing Director [KMP] of DHP India Limited [DIN : 0044783]

The Calcutta Stock Exchange Limited
Listing Department
Re: [blank]
Contents not verified
Sl. No. 11 Dated 1/3/21
Signature [blank]

Enclosed : Report Under Regulation 10(5) of SEBI (SAST) Regulations, 2011 – 2 pages

EW021923915IN IVR:698702192391

SP MIDDLETON ROW SO <700071>

Counter No:1,01/03/2021,12:52

To:THE LISTING D,DEPT OF CORPORAT

PIN:400001, Mumbai GPO

From:ASHEESH DAB,13/2 BALLYGUNGE

Wt:40gms

Amt:53.10(Cash)Tax:8.10

<Track on www.indiapost.gov.in>



PAID

FORMAT FOR DISCLOSURES UNDER REGULATION 10(5) - INTIMATION TO STOCK EXCHANGES IN RESPECT OF ACQUISITION UNDER REGULATION 10(1)(a) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011

ANN-B (273)

(For Transaction falling under Regulation 10(1)(a)(i) & (ii) - Acquisition through Inter-se Transfer of Shares)

1	Name of the Target Company (T.C.)	DHP India Limited
2	Name of the acquirer(s)	Asheesh Dabriwal
3	Whether the acquirer(s) is/are promoters of the T.C. prior to the transaction. If not, nature of relationship or association with the T.C. or its promoters.	YES. Acquirer is Managing Director of the T.C. and Promoter of the T.C.
4	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired.	1) Nirmal Kumar Dabriwala - [Father of acquirer] 2) Kumkum Dabriwal - [Mother of acquirer]
	b. Proposed date of acquisition	08-03-2021
	c. Number of shares to be acquired from each person mentioned in 4(a) above.	1) Nirmal Kumar Dabriwal - 9,65,000 Equity Shares 2) Kumkum Dabriwal - <u>1,80,100 Equity Shares</u> Total of 2 Nos. sellers - 11,45,100 Equity Shares
	d. Total shares to be acquired as % of share capital of T.C.	11,45,100 Equity Shares i.e. 38.17% share of T.C.
	e. Price at which shares are proposed to be acquired.	Not Applicable Inter-se-transfer between the Promoters with their Immediate Relative by way of Gift on Off-Market Transaction - Exemption covered u/r.10(1)(a)(i)
	f. Rationale, if any, for the proposed transfer.	Inter-se transfer of shares amongst promoters of TC under immediate relative, as a gift, through an off market transaction. [See Note No. 1 & 2]
5	Relevant sub-clause of Regulation 10(1)(a) under which the acquirer is exempted from making open offer.	Regulation 10(1)(a)(i) and 10(1)(a)(ii) of SEBI (SAST) Regulations, 2011
6	If, frequently traded, volume weighted average market price for a period of sixty trading days preceeding the date of issuance of this notice as traded on the Stock Exchange, where the Maximum volume of trading in the shares of the T.C. are recorded during such period.	Not Applicable Inter-se-transfer between the Promoters with their immediate relative by way of Gift on Off-Market Transactions. The Shares of the Company is "Frequent Traded" with BSE and VWAP (Volume-Weighted Average Price) of last sixty trading days as u/r.8(2)(d) of SEBI (SAST) Regulations, 2011 is <u>Rs.396.69</u>
7	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not Applicable in case of frequent traded

Cont. 2

Date : 01/03/2021
Place : Kolkata

asheesh
[ASHEESH DABRIWAL]
Acquirer & Promoter [DIN : 00044783]

Continuation of FORMAT FOR DISCLOSURES UNDER REGULATION 10(5) - INTIMATION TO STOCK EXCHANGES IN RESPECT OF ACQUISITION UNDER REGULATION 10(1)(a) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011

ANK-B/343

(For Transaction falling under Regulation 10(1)(a)(i) & (ii) - Acquisition through Inter-se Transfer of Shares)

8	Declaration by the acquirer, that the acquisition price could not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	Not Applicable - Inter se Transfer between the Promoters - Immediate Relative by way of Gift on Off Market Transaction - Exemption u/r.10(1)(a)(i)	
9	Declaration by the acquirer, that the transferor and transferee(s) have complied/will comply with applicable disclosure requirement in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations, 1997).	Yes, the transferor and transferee have complied/will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011.	
10	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	I hereby declare that all the conditions specified under Regulation 10(1)(a) with respect to exemptions has been duly complied with.	
11	Shareholding Details	Before the proposed transaction [No of shares & % w.r.t. Total share Capital of TC]	After the proposed transaction [No of shares & % w.r.t. Total share Capital of TC]
	a. Acquirer(s) and PACs (Other than Sellers) ACQUIRER : Asheesh Dabriwal - (Promoter)	6,62,600 Shares (22.09 %)	18,07,700 Shares (60.26 %)
	PAC (Other than sellers) :-		
	1) Anjum Dhandhania	20,000 Shares (0.67 %)	20,000 Shares (0.67 %)
	2) Dabriwala Constructions Private Limited	3,85,600 Shares (12.85 %)	3,85,600 Shares (12.85 %)
	3) Dolphin Properties Private Limited	17,900 Shares (0.60 %)	17,900 Shares (0.60 %)
	b. Seller(s)		
	PAC (Seller) :-		
	1) Nirmal Kumar Dabriwala -[Father of acquirer]	9,65,000 shares (32.17 %)	NIL [0.00 %]
	2) Kumkum Dabriwal - [Mother of acquirer]	1,80,100 shares (6.00 %)	NIL [0.00 %]
	Total of 2 nos. Sellers	11,45,100 shares (38.17 %)	NIL [0.00 %]
	[See Note No 1 & 2]		

Note No. (1) In terms of Memorandum of Gift between Sri Nirmal Kumar Dabriwala (Father of acquirer) and Sri Asheesh Dabriwal (Son of Seller), 9,65,000 Equity Shares of the Company (32.17% of TC) owned by Sri Nirmal Kumar Dabriwala (Father of acquirer) were to be gifted to Sri Asheesh Dabriwal (Son of Seller). The Transaction was in process as on date of proposed acquisition on off market transaction. On Completion of the aforementioned transaction of gift, Sri Nirmal Kumar Dabriwala (Father of acquirer) holding NIL Shares.

Note No. (2) In terms of Memorandum of Gift between Smt Kumkum Dabriwal (Mother of acquirer) and Sri Asheesh Dabriwal (Son of Seller), 1,80,100 Equity Shares of the Company (6.00 % of TC) owned by Smt. Kumkum Dabriwal (Mother of acquirer) were to be gifted to Sri Asheesh Dabriwal (Son of Seller). The Transaction was in process as on date of proposed acquisition on off market transaction. On Completion of the aforementioned transaction of gift, Smt. Kumkum Dabriwal (Mother of acquirer) holding NIL Shares.

The aforesaid Report under Regulation 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of acquisition under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

asheesh

Date : 01/03/2021

Place : Kolkata

[ASHEESH DABRIWAL]

Acquirer & Promoter [DIN : 00044783]

ASHEESH DABRIWAL

ANN - 'C' (123)

2A/3A, Sapphire
13/2, Ballygunge Park Road
Kolkata - 700 019

Phone No : (033) 2229-5735/7995/9626/7929

Email : asheesh@dhpindia.com

Dated : 09-03-2021

To

- 1) The Listing Department, Department of Corporate Services,
Bombay Stock Exchange Limited [Securities Code No. 531306]
25, P.J.Towers, Dalal Street, Mumbai - 400 001.
- 2) The Secretary,
The Calcutta Stock Exchange Ltd. [Securities Code No. 14058]
7, Lyons Range, Kolkata - 700 001.
- 3) The Company Secretary-cum-Compliance Officer,
DHP INDIA LIMITED [Target Company], 10, Middleton Row, Kolkata - 700 071.

Dear Sir,

RE : ISIN : INE590D01016 - DHP INDIA LIMITED

Subject : Disclosure under Regulation 10(6) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 of Details of acquisition of 11,45,100 Equity Shares of Target Company [38.17% of total Capital of TC] by way of inter-se-transfer amongst promoters in immediate relative by way of gift from off market transaction- Claimed as Exempted for Public Announcement and covered u/r.10(1)(a)(i) & (ii) of SEBI (SAST) Regulations, 2011

In terms of disclosure under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I **Asheesh Dabriwal**, Promoter and Managing Director [KMP] of DHP India Limited [CIN : L65921WB1991PLC051555] ("The Company"), resident of 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata - 700 019, hereby submit the disclosure with regard to acquisition of 11,45,100 Equity Shares of the Company Shares [38.17% of Total Capital of the Company] on 08-03-2021 owned by me, treated as inter-se-transfer of shares, within immediate relative, as per Memorandum of Gift executed between :-

- (1) Sri Nirmal Kumar Dabriwala, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 9,65,000 Equity Shares [32.17%] of DHP India Limited [Gift from father to son], and
- (2) Smt. Kumkum Dabriwal, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 1,80,100 Equity Shares [6.00%] of DHP India Limited [Gift from mother to son].

The aforementioned transfer occurred on 08-03-2021 by way of an Off-Market Transaction. This is for your information and record.

Thanking You,

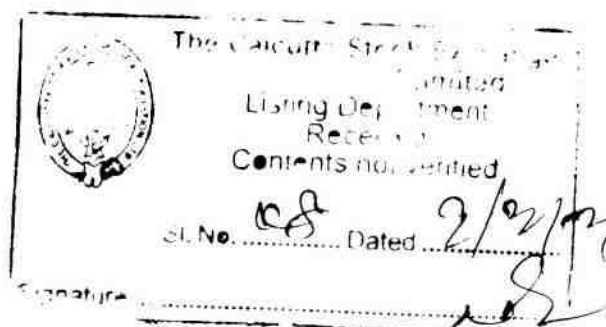
Yours Faithfully,

asheesh

[ASHEESH DABRIWAL]

Acquirer, Promoter & Managing Director [KMP] of DHP India Limited.

Enclosed : Report Under Regulation 10(6) SEBI (SAST) Regulations, 2011 - 2 pages.



**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**

Ann-C (2 of 3)

(For Transaction falling under Regulation 10(1)(a)(i) & (ii) - Acquisition through Inter-se Transfer of Shares)

1	Name of the Target Company (T.C.)	DHP India Limited	
2	Name of the acquirer(s)	Asheesh Dabriwal	
3	Name of the Stock Exchanges, where shares of the T.C. are listed	1) The Calcutta Stock Exchange Ass.Ltd.[Sec.Code-14058] 2) Bombay Stock Exchange Ltd, Mumbai [Sec. Code. 531306]	
4	Details of the transaction including rationale, if any for the transfer/acquisition of shares.	Inter-se-transfer of (1) 9,65,000 Equity Shares from "Nirmal Kumar Dabriwala", and (2) 1,80,100 Equity Share from "Kumkum Dabriwal", i.e. total of above 2 nos. transferer of 11,45,100 Equity Shares to "Asheesh Dabriwal" promoter of the Company, as per Memorandum of Gift.	
5	Relevant regulation under which the acquirer is exempted from making open offer.	Regulation 10(1)(a)(i) and 10(1)(a)(ii) of SEBI(SAST) Regulations, 2011.	
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 Exchanges.	Yes. The disclosure of proposed acquisition was required to be made under regulation 10(5). Yes. The declaration under Regulation 10(5) was made within the stipulated time specified under the SEBI (SAST) Regulations, 2011 01-03-2021	
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 transferer/seller(s)	1) Nirmal Kumar Dabriwala 2) Kumkum Dabriwal	YES (both details made by the acquirer - Asheesh Dabriwal)
	b. Date of Acquisition	08-03-2021	
	c. No. of shares/voting rights in respect of the acquisitions from each person mentioned in 7(a) above. 1) Nirmal Kumar Dabriwala-Seller/Transferer 2) Kumkum Dabriwal - Seller/Transferer Total of 2 nos. Sellers/Transferer(s)	9,65,000 Equity Shares (32.17 %) 1,80,100 Equity Shares (6.00 %) 11,45,100 Equity Shares (38.17 %)	
	d. Total shares proposed to be acquired/actually acquired as a % of diluted share capital of T.C.	11,45,100 Equity Shares i.e. @38.17% of T.C.	
	e. Price at which shares are proposed to be acquired/actually acquired.	Not Applicable. Due to Gift of shares from Parents to Son by way of Inter-se-transfer amongst promoters u/r.10(1)(a)(i) of SEBI (SAST) Regulations, 2011.	

Cont. 2

Date : 09/03/2021
Place : Kolkata

Asheesh
[ASHEESH DABRIWAL]
Acquirer & Promoter

Continuation of 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

Ann-C (3 of 3)

(For Transaction falling under Regulation 10(1)(a)(i) & (ii) - Acquisition through Inter-se Transfer of Shares)

8	Shareholding details	Pre-Transaction [No of shares & % w.r.t. Total share Capital of TC]	Post-Transaction [No of shares & % w.r.t. Total share Capital of TC]
a.	Each Acquirer/ Transferee Asheesh Dabriwal - Acquirer	<u>6,62,600 Eq. Shares (22.09 %)</u>	<u>18,07,700 Eq. Shares (60.26 %)</u>
b.	Each Seller(s)/Transferer(s) 1) Nirmal Kumar Dabriwala-Seller/Transferer 2) Kumkum Dabriwal - Seller/Transferer Total of 2 nos. Sellers/Transferer(s)	9,65,000 Eq. Shares (32.17 %) <u>1,80,100 Eq. Shares (6.00 %)</u> <u>11,45,100 Eq. Shares (38.17 %)</u> <u>[See Note 1, 2 & 3]</u>	NIL [0.00 %] <u>NIL [0.00 %]</u> <u>NIL [0.00 %]</u> <u>[See Note 1, 2 & 3]</u>

Note No. (1) In terms of Memorandum of Gift executed between Sri Nirmal Kumar Dabriwala, the Doner/ Transferer and Sri Asheesh Dabriwal, the Donee/Transferee, 9,65,000 Equity Shares of the Company (32.17% of TC) owned by Sri Nirmal Kumar Dabriwala in the Company are Gifted to the entire shares to his Son Sri Asheesh Dabriwal on 08-03-2021 by way of off market transaction. Sri Nirmal Kumar Dabriwala holds NIL Equity Shares of the Company after completing of aforesaid gift of equity shares.

Note No. (2) In terms of Memorandum of Gift executed between Smt. Kumkum Dabriwal, the Doner/ Transferer and Sri Asheesh Dabriwal, the Donee/Transferee, 1,80,100 Equity Shares of the Company (6.00% of TC) owned by Smt. Kumkum Dabriwal in the Company are Gifted to the entire shares to his Son Sri Asheesh Dabriwal on 08-03-2021 by way of off market transaction. Smt. Kumkum Dabriwal holds NIL Equity Shares of the Company after completing of aforesaid gift of equity shares.

Note No. (3) The above Gift of both persons Equity shares is completed by way of presentation of Depository Instruction Slip to the concerned agency for transfer of Dematerialised Shareholding, with the aforementioned slip containing the Number of Equity Shares Gifted by Sri Nirmal Kumar Dabriwala to Sri Asheesh Dabriwal & also another transaction of Number of Equity Shares Gifted by Smt. Kumkum Dabriwal to Sri Asheesh Dabriwal.

The aforesaid Report under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of acquisition under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Date : 09/03/2021
Place : Kolkata

asheesh
[ASHEESH DABRIWAL]
Acquirer & Promoter

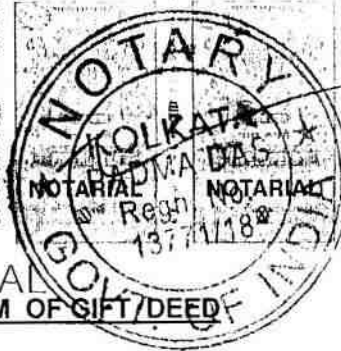
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INDIA NON



WEST BENGAL

MEMORANDUM OF GIFT/DEED

53AB 146074

Page 1 of 2

I, Nirmal Kumar Dabriwala [Income Tax PAN : ACXPD5209M], son of Late Mohan Lal Dabriwala, residing at 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata – 700 019, do hereby declare, state and affirm as under :-

- [1] That I declare that I have made a gift of 9,65,000 Equity Shares of DHP India Limited [CIN : L65921WB1991PLC051555] under ISIN : INE590D01016 to my son Sri Asheesh Dabriwal (Income Tax PAN : ACWPD6237E) son of Mr. Nirmal Kumar Dabriwala, residing at "2A/3A Sapphire" 13/2, Ballygunge Park Road, Kolkata – 700 019, out of my natural love and affection for him.
- [2] That the said gift was made by off-market transaction from my Demat Account with HDFC Bank Ltd., from my DP ID. No. IN301549 & Client ID No. 55587330 on 08-03-2021 of 9,65,000 Equity Shares of DHP India Limited, ISIN No. INE590D01016 to my Son Mr. Asheesh Dabriwal, Demat Account with HDFC Bank Ltd., their DP ID. No. IN301549 & Client ID. No. 55613528. The said gift was made by me out of my own capital. The Other disclosure of said Gift are as below :-
 - [a] The Cost Price of aforesaid gift of 9,65,000 Equity Shares of DHP India Limited as per my Books of Accounts is Rs.1,09,61,823.34 i.e. @Rs.11.36 per Equity Shares.

Accepted by : *Asheesh*
Asheesh Dabriwal (Donee)

Declared by : *Nirmal Kumar Dabriwala*
Nirmal Kumar Dabriwala (Donor)
Cont. page 2

PALMA LINES
NOTARY
Regn. No. 1371/18
C.M.M.'s Court
Kolkata-700 001

08 MAR 2021

224027

S.L. No. Sold To

Ra. Addre.

G.C. SAHA

(Govt.) LICENSED STAMP VENDOR
11A, Mirza Ghalib Street, Kol-87

Issue Date Sign.

N. K. Dabnivala

13/2, Ballygunge Park Rd

K5/19

18 FEB 2021

Continuation of MEMORANDUM OF GIFT DEED



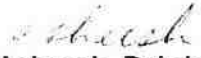

Page 2 of 2

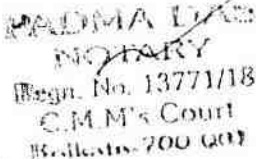
- [b] The aforesaid gift covered as "**inter-se-transfer**" amongst promoters under regulation 10(1)(a)(i) and regulation 10(1)(a)(ii) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
- [c] I am also covered under the "**Promoters Group**" of DHP India Limited. Hence, I also declare that I will comply the requirement of disclosure of Regulation 29(2) of SEBI (Substantial Acquisitions of Shares & Takeovers) Regulations, 2011 and Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 to the Stock Exchanges, where the shares are listed and also inform to the Company, after the necessary transfer of shares as gift is executed.
- [d] The aforesaid transfer of shares is covered under "inter-se-transfer" amongst promoter under regulations 10(1)(a) of SEBI (SAST) Regulations, 2011 as a way of Gift, hence the "Offer price" is Not applicable. However, for calculation point of view, the "Offer Price" as per Regulation 8(2)(d) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 of DHP India Limited Calculated as Rs.396.69 per share and Total Value calculated on "Offer Price" of said 9,65,000 Equity Shares is Rs.38,28,05,850/-.
- [3] That the above mentioned gift is irrevocable and forever. I have no right, title or interest whatsoever in the said shares on and from the date of the said gift.
- [4] That I am assessed under PAN : ACXPD5209M [ITO Ward – 33(1) / Kolkata.]
- [5] That this declaration is being made in confirmation of the aforesaid gift to avoid any misunderstanding or doubt in future.
- [6] That the above statements are correct and true to the best of my knowledge and belief.

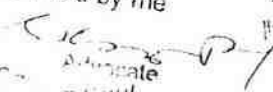
Solemnly declared by

Nirmal Kumar Dabriwala
DEPONENT / DECLARANTon this 8th day of March, 2021

Confirm having accepted


 Asheesh Dabriwal
 PAN : ACWPD6237E
SOLEMNLY AFFIRMED AND DECLARED
BEFORE ME ON IDENTIFICATION

 PADMA DAS
 NOTARY


 PADMA DAS
 NOTARY
 Regn. No. 13771/18
 C.M.M.'s Court
 Radicals-200 QOT


 Advocate
 C.M.M. Court Kolkata

08 MAR 2021



Page 1 of 2

I, Kumkum Dabriwal [Income Tax PAN : ADSPD3512F], Daughter of Late Shyam Sunder Swaika, and wife of Sri Nirmal Kumar Dabriwala, residing at 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata – 700 019, do hereby declare, state and affirm as under :-

- [1] That I declare that I have made a gift of 1,80,100 Equity Shares of DHP India Limited [CIN : L65921WB1991PLC051555] under ISIN : INE590D01016 to my son Sri Asheesh Dabriwal (Income Tax PAN : ACWPD6237E) son of Mr. Nirmal Kumar Dabriwala, residing at "2A/3A Sapphire" 13/2, Ballygunge Park Road, Kolkata – 700 019, out of my natural love and affection for him.
- [2] That the said gift was made by off-market transaction from my Demat Account with HDFC Bank Ltd., from my DP ID. No. IN301549 & Client ID No. 55589559 on 08-03-2021 of 1,80,100 Equity Shares of DHP India Limited, ISIN No. INE590D01016 to my Son Mr. Asheesh Dabriwal, Demat Account with HDFC Bank Ltd., their DP ID. No. IN301549 & Client ID. No. 55613528. The said gift was made by me out of my own capital. The Other disclosure of said Gift are as below :-
 - [a] The Cost Price of aforesaid gift of 1,80,100 Equity Shares of DHP India Limited as per my Books of Accounts is Rs.19,74,200/- i.e. @Rs.10.96 per Equity Shares.

Accepted by: *Asheesh*
Asheesh Dabriwal (Donee)

Declared by: *Kumkum Dabriwal*
Kumkum Dabriwal (Donor)

Cont. page 2

PADMA DAS
NOTARY
Regn. No. 13771/18
C.M.B.'s Court
Kolkata-700 001

08 MAR 2021

224028

S.L. No. Sold To. *Kumkum Dabn'wal.*

Re. Addre.
G.C. SAHA
(Govt.) LICENSED STAMP VENDOR
11A, Mirza Galib Street, Kol-87

13/2, Ballygunge Park Rd
Kol-19

.....
.....

18 FEB 2021

Continuation of MEMORANDUM OF GIFT DEED

Page 2 of 2

- [b] The aforesaid gift covered as **"inter-se-transfer"** amongst promoters under regulation 10(1)(a)(i) and regulation 10(1)(a)(ii) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
- [c] I am also covered under the **"Promoters Group"** of DHP India Limited. Hence, I also declare that I will comply the requirement of disclosure of Regulation 29(2) of SEBI (Substantial Acquisitions of Shares & Takeovers) Regulations, 2011 and Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 to the Stock Exchanges, where the shares are listed and also inform to the Company, after the necessary transfer of shares as gift is executed.
- [d] The aforesaid transfer of shares is covered under "inter-se-transfer" amongst promoter under regulations 10(1)(a) of SEBI (SAST) Regulations, 2011 as a way of Gift, hence the "Offer price" is Not Applicable. However, for calculation point of view, the "Offer Price" as per Regulation 8(2)(d) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 of DHP India Limited Calculated as **Rs.396.69** per share and Total Value calculated on "Offer Price" of said 1,80,100 Equity Shares is **Rs.7,14,43,869/-**
- [3] That the above mentioned gift is irrevocable and forever. I have no right, title or interest whatsoever in the said shares on and from the date of the said gift.
- [4] That I am assessed under PAN : ADSPD3512F [ITO Ward – 33(1) / Kolkata.]
- [5] That this declaration is being made in confirmation of the aforesaid gift to avoid any misunderstanding or doubt in future.
- [6] That the above statements are correct and true to the best of my knowledge and belief.

Solemnly declared by

Kumkum Dabriwal

Kumkum Dabriwal
DEPONENT / DECLARANT

on this 8th day of March, 2021

Confirm having accepted

Asheesh Dabriwal
Asheesh Dabriwal
PAN : ACWPD6237E

SOLEMNLY AFFIRMED AND DECLARED
BEFORE ME ON IDENTIFICATION

PADMA DAS
NOTARY

PADMA DAS
NOTARY
Regn. No. 13771/18
C.M.M.'s Court
Kolkata, 200001

08 MAR 2021

Witnessed by me
Sampa Paul
Advocate
Sampa Paul
C.M.M. Court Kolkata



DHP INDIA LIMITED

Corporate Identity Number (CIN) : L65921WB1991PLC051555

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Registered Office : 10 Middleton Row, Kolkata 700 071, India
Tel : +91(33) 2229-5735, 2229-7995, Fax : +91(33) 2217-2751
E-mail : info@dhpindia.com

Dt. 10/03/2021

TO WHOM IT MAY CONCERN

Page 1 of 3

Certificate of Calculation of "Offer Price" as per Regulation 8(2) of SEBI (SAST) Regulations, 2011

This Certificate is in the reference of Public Announcement date 01-03-2021 for Acquisition of Shares on 08-03-2021 by Sri Ashesh Dabirwal - Promoter and Managing Director of the Company. We also certify that the Shares of our Company DHP India Limited is "Frequently Traded" in Bombay Stock Exchange (BSE). We hereby Certify that the Calculation of Volume-Weighted Average Market Price (VWAP) of DHP India Limited for a period of Sixty Trading Days immediately preceeding the date of the public announcement i.e. from 03/12/2020 to 26/02/2021 as traded on the Bombay Stock Exchange [Securities Code No. 531306 & ISIN No. INE590D01016] where the maximum volume of trading in the shares of the Target Company [DHP India Limited] are recorded during such period, in case of Exchange [Sec. Code No. 531306 & ISIN No. INE590D01016] where the maximum volume of trading in the shares of the Target Company [DHP India Limited] is calculated as Rs.396.69 as per Regulation 8(2)(d) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 is "Deemed to be Offer Price" u/r. 8 (2) i.e. Rs.396.69.

The Calculation of "Offer Price" (in case of "frequent traded" with Bombay Stock Exchange) as per regulation 8 are as below :-
Regulation 8(1) of SEBI (SAST) Regulations, 2011 - The Open Offer for acquiring under regulation 3, regulation 4, regulation 5 or regulation 6 shall be determined not lower than price determined in sub-regulation (2) or (3), as the case may be.

Regulation 8(2) of SEBI (SAST) Regulations, 2011 - In case of Direct Acquisition, the price determined as below :-

(a) The highest Negotiable Price for acquisition of shares of Target company "DHP INDIA LTD. - NOT APPLICABLE... as Gift of Shares and in case of inter se transfer u/r. 10(1)(a)(i).										
(b) The Volume-weighted Average Price (VWAP) paid or payable for acquisitions of the shares of the target company "DHP INDIA LTD" as Quoted on the Bombay Stock Exchange Ltd. (in which shares are frequently traded) of last fifty-two weeksNOT APPLICABLE... as Gift of Shares and in case of inter se transfer u/r. 10(1)(a)(i).										
(c) The highest price paid/payable by acquirer(s) for acquisition of shares of TC during the 26 weeks prior NOT APPLICABLE.... as Gift of Shares and in case of inter se transfer u/r. 10(1)(a)(i).										
(d) The Volume-Weighted Average Market Price (VWAP) of the shares of target company "DHP INDIA LTD" as Quoted on the Bombay Stock Exchange Ltd. (in which shares are frequently traded) of last sixty trading days from the date of inter se transfer i.e. from 03/12/20 to 26/02/2021 is Calculated as below <u>Rs. 396.69</u> . The details are as below :-										
Day No.	Effective Day Ending	Daily High Price (Rs.)	Daily Low Price (Rs.)	Closing Price (Rs.)	Daily Volume No of Shares	Typical Price [(H+L+C)/3-Rs.]	Volume*Typical Price (Rs.)	Cumul. Volume Price (Rs.)	Cumul. Volume No of Shares	VWAP (Rs.)
1	26-02-2021	411.55	389.20	392.75	825	397.83	328209.75	328209.75	825	397.83
2	25-02-2021	399.80	387.20	392.00	423	393.00	166239.00	494448.75	1248	396.19
3	24-02-2021	400.00	385.00	392.90	1310	392.63	514345.30	1008794.05	2558	394.37
4	23-02-2021	399.70	388.00	393.80	612	393.83	241023.96	1249818.01	3170	394.26
5	22-02-2021	413.00	385.00	394.70	1025	397.57	407509.25	1657327.26	4195	395.07
6	19-02-2021	402.30	390.00	395.15	6651	395.82	2632598.82	4289926.08	10846	395.53
7	18-02-2021	421.00	391.15	410.50	1511	407.55	615808.05	4905734.13	12357	397.00
8	17-02-2021	424.75	400.25	405.55	779	410.18	319530.22	5225264.35	13136	397.78
9	16-02-2021	438.00	415.00	417.15	767	423.38	324732.46	5549996.81	13903	399.19
10	15-02-2021	445.00	414.00	431.20	1119	430.07	481248.33	6031245.14	15022	401.49
11	12-02-2021	449.00	398.00	431.95	1527	426.32	650990.64	6682235.78	16549	403.78
12	11-02-2021	408.95	396.00	404.55	477	403.17	192312.09	6874547.87	17026	403.77
13	10-02-2021	408.40	395.00	404.65	1064	402.68	428451.52	7302999.39	18090	403.70
14	09-02-2021	406.00	392.50	397.00	679	398.50	270581.50	7573580.89	18769	403.52
15	08-02-2021	415.00	395.00	400.90	860	403.63	347121.80	7920702.69	19629	403.52

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Continuation of Certificate of Volume-Weighted Average Price as per Regulation 8(2)(d) of SEBI (SAST) Regulations, 2011

Day No.	Effective Day Ending	Daily High Price (Rs.)	Daily Low Price (Rs.)	Closing Price (Rs.)	Daily Volume No of Shares	Typical Price [(H+L+C)/3-Rs.]	Volume*Typical Price (Rs.)	Cumul. Volume Price (Rs.)	Cumul. Volume No of Shares	VWAP (Rs.)
16	05-02-2021	420.00	396.00	406.55	1475	407.52	601092.00	8521794.69	21104	403.80
17	04-02-2021	418.60	402.50	413.40	1081	411.50	444831.50	8966626.19	22185	404.18
18	03-02-2021	428.00	404.15	406.70	650	412.95	268417.50	9235043.69	22835	404.42
19	02-02-2021	422.30	401.40	419.75	1185	414.48	491158.80	9726202.49	24020	404.92
20	01-02-2021	428.00	352.00	401.15	1956	393.72	770116.32	10496318.81	25976	404.08
21	29-01-2021	429.80	410.00	425.90	2913	421.90	1228994.70	11725313.51	28889	405.87
22	28-01-2021	415.00	396.70	405.10	54	405.60	21902.40	11747215.91	28943	405.87
23	27-01-2021	410.00	393.00	410.00	274	404.33	110786.42	11858002.33	29217	405.86
24	25-01-2021	428.50	391.05	396.95	467	405.50	189368.50	12047370.83	29684	405.85
25	22-01-2021	422.00	407.05	412.10	965	413.72	399239.80	12446610.63	30649	406.10
26	21-01-2021	427.90	402.00	406.40	1301	412.10	536142.10	12982752.73	31950	406.35
27	20-01-2021	430.00	411.10	415.40	963	418.83	403333.29	13386086.02	32913	406.71
28	19-01-2021	444.50	411.05	430.00	3058	428.52	1310414.16	14696500.18	35971	408.57
29	18-01-2021	431.80	412.00	413.50	394	419.10	165125.40	14861625.58	36365	408.68
30	15-01-2021	440.50	420.55	431.80	793	430.95	341743.35	15203368.93	37158	409.15
31	14-01-2021	442.00	412.00	433.30	1364	429.10	585292.40	15788661.33	38522	409.86
32	13-01-2021	444.55	375.00	435.25	11908	418.27	4980759.16	20769420.49	50430	411.85
33	12-01-2021	376.25	361.60	370.50	289	369.45	106771.05	20876191.54	50719	411.60
34	11-01-2021	379.50	360.00	367.40	2030	368.97	749009.10	21625200.64	52749	409.96
35	08-01-2021	384.00	372.60	374.95	1264	377.18	476755.52	22101956.16	54013	409.20
36	07-01-2021	391.50	380.00	380.05	481	383.85	184631.85	22286588.01	54494	408.97
37	06-01-2021	389.95	378.30	379.10	928	382.45	354913.60	22641501.61	55422	408.53
38	05-01-2021	394.70	382.00	387.90	941	388.20	365296.20	23006797.81	56363	408.19
39	04-01-2021	395.50	376.00	381.65	4695	384.38	1804664.10	24811461.91	61058	406.36
40	01-01-2021	372.90	366.00	368.55	589	369.15	217429.35	25028891.26	61647	406.00
41	31-12-2020	372.00	362.00	365.25	937	366.42	343335.54	25372226.80	62584	405.41
42	30-12-2020	373.00	353.50	368.40	1194	364.97	435774.18	25808000.98	63778	404.65
43	29-12-2020	371.90	360.00	368.00	349	366.63	127953.87	25935954.85	64127	404.45
44	28-12-2020	365.00	350.20	362.50	470	359.23	168838.10	26104792.95	64597	404.12
45	24-12-2020	361.00	349.95	351.85	923	354.27	326991.21	26431784.16	65520	403.42
46	23-12-2020	357.40	342.00	351.10	858	350.17	300445.86	26732230.02	66378	402.73
47	22-12-2020	354.00	332.05	350.85	464	345.63	160372.32	26892602.34	66842	402.33
48	21-12-2020	363.90	347.00	348.45	437	353.12	154313.44	27046915.78	67279	402.01
49	18-12-2020	360.00	351.00	351.90	539	354.30	190967.70	27237883.48	67818	401.63
50	17-12-2020	367.90	353.00	355.00	918	358.63	329222.34	27567105.82	68736	401.06
51	16-12-2020	364.80	352.15	354.05	838	357.00	299166.00	27866271.82	69574	400.53

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DHP INDIA LIMITED

Corporate Identity Number (CIN) : L65921WB1991PLC051555

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IAS-ANZ



ISO 9001, ISO 14001 and
ISO 45001 Certified Company

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Continuation of Certificate of Volume-Weighted Average Price as per Regulation 8(2)(d) of SEBI (SAST) Regulations, 2011

Day No.	Effective Day Ending	Daily High Price (Rs.)	Daily Low Price (Rs.)	Closing Price (Rs.)	Daily Volume No of Shares	Typical Price [(H+L+C)/3-Rs.]	Volume*Typical Price (Rs.)	Cumul. Volume Price (Rs.)	Cumul. Volume No of Shares	VWAP (Rs.)
52	15-12-2020	370.00	350.00	356.00	1131	358.67	405655.77	28271927.59	70705	399.86
53	14-12-2020	366.00	355.00	363.90	871	361.63	314979.73	28586907.32	71576	399.39
54	11-12-2020	364.00	353.20	356.50	562	357.90	201139.80	28788047.12	72138	399.07
55	10-12-2020	364.90	355.00	356.25	350	358.72	125552.00	28913599.12	72488	398.87
56	09-12-2020	375.00	355.50	357.75	1323	362.75	479918.25	29393517.37	73811	398.23
57	08-12-2020	367.50	355.00	364.45	1143	362.32	414131.76	29807649.13	74954	397.68
58	07-12-2020	367.50	357.50	364.15	760	363.05	275918.00	30083567.13	75714	397.33
59	04-12-2020	359.95	353.20	355.10	346	356.08	123203.68	30206770.81	76060	397.14
60	03-12-2020	360.00	351.50	359.90	881	357.13	314631.53	30521402.34	76941	396.69

(e) In case of infrequent traded target company "DHP INDIA LTD. - NOT APPLICABLE....in case of frequent traded and inter se transfer

(f) In case of indirect acquisition u/r. 5(2) of TC "DHP INDIA LTD. - NOT APPLICABLE....in case of direct acquisition u/r. 10(1)(a)(i).

Regulation 8(3) of SEBI (SAST) Regulations, 2011 - In case of Indirect Acquisition of shares of TC : DHP INDIA LIMITED

..... NOT APPLICABLE....in case of frequent traded and inter se transfer

However the highest of above (a), (b), (c), (d), (e) and (f) of Regulation 8(2) i.e. Rs. 396.69 calculated as "Offer Price" as per Regulation 8(2)(d). We further confirm that the price of inter se transfer of shares taken as same price of Rs.396.69 as per Regulation 8(2)(d) and the above price is not exceeds 25% of the price determined.

Place : Kolkata
Date : 10/03/2021



For DHP INDIA LIMITED

[CA Ashok Kumar Singh]
Chief Financial Officer

Factory : Dhulagarh Industrial Park, P.O. Kanduah, P.S. Sankrail, N.H.-6, Howrah 711 302, West Bengal
Tel : (+91) 76050-00585, 76050-00586



DHP INDIA LIMITED

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Dt. 10/03/2021

TO WHOM IT MAY CONCERN

This is reference to the *inter se transfer* of equity shares between "Promoters" of our company on 08/03/2021. We hereby confirm that the shareholding of the Acquirer(s)/Transferor(s) in this interse transfer our shares of our company as on one day prior to the date of acquisition i.e. 07/03/2021, one day after to the date of acquisition i.e. 09/03/2021, and one year prior to the date of acquisition i.e. 08/03/2020 is as below:-

		One year prior holding from the date of acquisition i.e. as on 08/03/2020	One day prior holding from the date of acquisition i.e. as on 07/03/2021	One day after holding from the date of acquisition i.e. as on 09/03/2021
Sl.No.	Name of Acquirer(s)/Transferee(s)	[No. of shares & %]	[No. of shares & %]	[No. of shares & %]
1	Asheesh Dabriwal	6,62,600 (22.09%)	6,62,600 (22.09%)	18,07,700 (60.26%)

Now, we hereby also confirm that the shareholding of "Transferor(s)/Seller(s) in this interse transfer of shares of our company as on of one day prior to the date of *inter se transfer* i.e. 07/03/2021 & one day after to the date of *inter se transfer* i.e. 09/03/2021 is as below :-

		One day prior holding from the date of acquisition i.e. as on 07/03/2021	One day after holding from the date of acquisition i.e. as on 09/03/2021
Sl.No.	Name of Seller(s)/Transferor(s)	[No. of shares & %]	[No. of shares & %]
1	Nirmal Kumar Dabriwala	9,65,000 (32.17%)	NIL (Nil %)
2	Kumkum Dabriwal	1,80,100 (6.00%)	NIL (Nil %)

For DHP INDIA LIMITED

Place : Kolkata
Date : 10/03/2021



[CA Ashok Kumar Singh]
Chief Financial Officer



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Dt. 10/03/2021

TO WHOM IT MAY CONCERN

The shareholding pattern for last three years prior to the date of acquisition on 08/03/2021 of undermentioned acquirer(s) as well as seller(s) i.e. as on 08/03/2018, 08/03/2019, & 08/03/2020 is as below:-

<i>Shareholding Pattern for Last Three Years Prior to the date of inter se transfer on 08/03/2021 (No. of shares & % of equity shares of the Co's)</i>				
Sl.No.	[A].Name of Acquirer(s)/Transferee(s)	As on 08/03/2018	As on 08/03/2019	As on 08/03/2020
1	Asheesh Dabriwal	6,62,600 (22.09%)	6,62,600 (22.09%)	6,62,600 (22.09%)
<i>Shareholding Pattern for Last Three Years Prior to the date of inter se transfer on 08/03/2021 (No. of shares & % of equity shares of the Co's)</i>				
Sl.No.	[B].Name of Seller(s)/Transferor(s)	As on 08/03/2018	As on 08/03/2019	As on 08/03/2020
1	Nirmal Kumar Dabriwala	9,65,000 (32.17%)	NIL (Nil %)	9,65,000 (32.17%)
2	Kumkum Dabriwal	1,80,100 (6.00%)	NIL (Nil %)	1,80,100 (6.00%)

We hereby also confirm that the above acquirer & seller both are under the promoters group and both are holding shares of our Company for a period of at least three years prior to the date of acquisition on 08/03/2021.

Place : Kolkata
Date : 10/03/2021



For DHP INDIA LIMITED

[CA Ashok Kumar Singh]
Chief Financial Officer

Shareholding Pattern

DHP INDIA LTD.

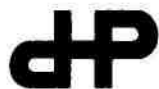
Scrip Code : 531306

Quarter Ending : December 2020

Statement showing shareholding pattern of the Promoter and Promoter Group

Category of shareholder	No. of shareholders	No. of fully paid-up equity shares held	Total nos. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) As a % of (A+B+C?)	Number of equity shares held in dematerialized form
A1) Indian				0.00	
Individuals/Hindu undivided Family	4	18,27,700	18,27,700	60.92	18,27,700
ANJUM DHANDHANIA	1	20,000	20,000	0.67	20,000
ASHEESH DABRIWAL	1	6,62,600	6,62,600	22.09	6,62,600
KUMKUM DABRIWAL	1	1,80,100	1,80,100	6.00	1,80,100
NIRMAL KUMAR DABRIWALA	1	9,65,000	9,65,000	32.17	9,65,000
Any Other (specify)	2	4,03,500	4,03,500	13.45	4,03,500
DABRIWALA CONSTRUCTIONS PVT LTD	1	3,85,600	3,85,600	12.85	3,85,600
DOLPHIN PROPERTIES PVT LTD	1	17,900	17,900	0.60	17,900
Sub Total A1	6	22,31,200	22,31,200	74.37	22,31,200
A2) Foreign				0.00	
A=A1+A2	6	22,31,200	22,31,200	74.37	22,31,200

BSE LTD ACKNOWLEDGEMENT	
Acknowledgement No	: 0701202112055931
Date & Time	: 07/01/2021 12:05:59 PM
Scrip Code	: 531306
Entity Name	: DHP INDIA LIMITED
Compliance Type	: Regulation 31 - Shareholding pattern
Quarter / Period	: 31/12/2020
Mode	: E-Filing



DHP INDIA LIMITED

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Dt. 10/03/2021

TO WHOM IT MAY CONCERN

This is reference to the "inter se transfer" of equity shares between "Promoters" of our company on 08/03/2021 and its announcement date 01/03/2021 vide U/r.10(5) of SEBI (SAST) Regulations, 2011. This is to inform that the Shares of our Company -DHP India Limited [ISIN No. INE590D01016] is "Frequently Traded" in BSE vide their Script Code : 531306 from Last Twelve Calender Month preceeding the Calender Month in which the Public Announcement i.e. From : Calender March'2020 to Calender February'2021, because the volume shares traded in such period in BSE is 3,01,159 Equity Shares, which is more than @10% of Total Equity Shares of the Company and as per Regulation 2(1)(j) of the SEBI (SAST) Regulations, 2011, the shares are treated as "Frequently Traded". The calculations are as below :-

SN	Calender Month	Total Volume of Shares Traded	% of Total Shares
1	March, 2020	42,753 Equity Shares	
2	April'2020	32,484 Equity Shares	
3	May'2020	10,477 Equity Shares	
4	June'2020	21,443 Equity Shares	
5	July'2020	23,567 Equity Shares	
6	August'2020	25,144 Equity Shares	
7	September'2020	22,667 Equity Shares	
8	October'2020	17,597 Equity Shares	
9	November'2020	24,727 Equity Shares	
10	December'2020	18,653 Equity Shares	
11	January'2021	35,671 Equity Shares	
12	February'2021	25,976 Equity Shares	
Total Traded Quantity in 12 Months		3,01,159 Equity Shares	10.04%

The Shares of the Company in Calcutta Stock Exchange (Securities Code No.14058) is hardly traded.

For DHP INDIA LIMITED

Place : Kolkata

Date : 10/03/2021



[CA Ashok Kumar Singh]
Chief Financial Officer



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Dt. 10/03/2021

TO WHOM IT MAY CONCERN

Page 1 of 2

Certificate of Volume-Weighted Average Price as per Regulation 8(2)(d) of SEBI (SAST) Regulations, 2011

This Certificate is in the reference of Public Announcement date 01-03-2021 for Acquisition of Shares on 08-03-2021 by Sri Asheesh Dabirwal - Promoter and Managing Director of the Company. We also certify that the Shares of our Company DHP India Limited is "Frequently Traded" in Bombay Stock Exchange (BSE). We hereby Certify that the Calculation of Volume-Weighted Average Market Price (VWAP) of DHP India Limited for a period of Sixty Trading Days immediately preceeding the date of the public announcement i.e. from 03/12/2020 to 26/02/2021 as traded on the Bombay Stock Exchange [Securities Code No. 531306 & ISIN No. INE590D01016] where the maximum volume of trading in the shares of the Target Company [DHP India Limited] are recorded during such period, in case of Exchange [Sec. Code No. 531306 & ISIN No. INE590D01016] where the maximum volume of trading in the shares of the Target Company [DHP India Limited] is calculated as Rs.396.69 as per Regulation 8(2)(d) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011. The details are as below :-

Day No.	Effective Day Ending	Daily High Price (Rs.)	Daily Low Price (Rs.)	Closing Price (Rs.)	Daily Volume No of Shares	Typical Price [(H+L+C)/3-Rs.]	Volume*Typical Price (Rs.)	Cumul. Volume Price (Rs.)	Cumul. Volume No of Shares	VWAP (Rs.)
1	26-02-2021	411.55	389.20	392.75	825	397.83	328209.75	328209.75	825	397.83
2	25-02-2021	399.80	387.20	392.00	423	393.00	166239.00	494448.75	1248	396.19
3	24-02-2021	400.00	385.00	392.90	1310	392.63	514345.30	1008794.05	2558	394.37
4	23-02-2021	399.70	388.00	393.80	612	393.83	241023.96	1249818.01	3170	394.26
5	22-02-2021	413.00	385.00	394.70	1025	397.57	407509.25	1657327.26	4195	395.07
6	19-02-2021	402.30	390.00	395.15	6651	395.82	2632598.82	4289926.08	10846	395.53
7	18-02-2021	421.00	391.15	410.50	1511	407.55	615808.05	4905734.13	12357	397.00
8	17-02-2021	424.75	400.25	405.55	779	410.18	319530.22	5225264.35	13136	397.78
9	16-02-2021	438.00	415.00	417.15	767	423.38	324732.46	5549996.81	13903	399.19
10	15-02-2021	445.00	414.00	431.20	1119	430.07	481248.33	6031245.14	15022	401.49
11	12-02-2021	449.00	398.00	431.95	1527	426.32	650990.64	6682235.78	16549	403.78
12	11-02-2021	408.95	396.00	404.55	477	403.17	192312.09	6874547.87	17026	403.77
13	10-02-2021	408.40	395.00	404.65	1064	402.68	428451.52	7302999.39	18090	403.70
14	09-02-2021	406.00	392.50	397.00	679	398.50	270581.50	7573580.89	18769	403.52
15	08-02-2021	415.00	395.00	400.90	860	403.63	347121.80	7920702.69	19629	403.52
16	05-02-2021	420.00	396.00	406.55	1475	407.52	601092.00	8521794.69	21104	403.80
17	04-02-2021	418.60	402.50	413.40	1081	411.50	444831.50	8966626.19	22185	404.18
18	03-02-2021	428.00	404.15	406.70	650	412.95	268417.50	9235043.69	22835	404.42
19	02-02-2021	422.30	401.40	419.75	1185	414.48	491158.80	9726202.49	24020	404.92
20	01-02-2021	428.00	352.00	401.15	1956	393.72	770116.32	10496318.81	25976	404.08
21	29-01-2021	429.80	410.00	425.90	2913	421.90	1228994.70	11725313.51	28889	405.87
22	28-01-2021	415.00	396.70	405.10	54	405.60	21902.40	11747215.91	28943	405.87
23	27-01-2021	410.00	393.00	410.00	274	404.33	110786.42	11858002.33	29217	405.86
24	25-01-2021	428.50	391.05	396.95	467	405.50	189368.50	12047370.83	29684	405.85
25	22-01-2021	422.00	407.05	412.10	965	413.72	399239.80	12446610.63	30649	406.10
26	21-01-2021	427.90	402.00	406.40	1301	412.10	536142.10	12982752.73	31950	406.35
27	20-01-2021	430.00	411.10	415.40	963	418.83	403333.29	13386086.02	32913	406.71
28	19-01-2021	444.50	411.05	430.00	3058	428.52	1310414.16	14696500.18	35971	408.57
29	18-01-2021	431.80	412.00	413.50	394	419.10	165125.40	14861625.58	36365	408.68
30	15-01-2021	440.50	420.55	431.80	793	430.95	341743.35	15203368.93	37158	409.15
31	14-01-2021	442.00	412.00	433.30	1364	429.10	585292.40	15788661.33	38522	409.86
32	13-01-2021	444.55	375.00	435.25	11908	418.27	4980759.16	20769420.49	50430	411.85
33	12-01-2021	376.25	361.60	370.50	289	369.45	106771.05	20876191.54	50719	411.60

Cont. page 2





DHP INDIA LIMITED

Corporate Identity Number (CIN) : L65921WB1991PLC051555

Ann-J (Page 2 of 2)



ISO 9001, ISO 14001 and
ISO 45001 Certified Company

Registered Office : 10 Middleton Row, Kolkata 700 071, India
Tel : +91(33) 2229-5735, 2229-7995, Fax : +91(33) 2217-2751

E-mail : info@dhpindia.com

Page 2 of 2

Continuation of Certificate of Volume-Weighted Average Price as per Regulation 8(2)(d) of SEBI (SAST) Regulations, 2011

Day No.	Effective Day Ending	Daily High Price (Rs.)	Daily Low Price (Rs.)	Closing Price (Rs.)	Daily Volume No of Shares	Typical Price [(H+L+C)/3-Rs.]	Volume*Typical Price (Rs.)	Cumul. Volume Price (Rs.)	Cumul. Volume No of Shares	VWAP (Rs.)
34	11-01-2021	379.50	360.00	367.40	2030	368.97	749009.10	21625200.64	52749	409.96
35	08-01-2021	384.00	372.60	374.95	1264	377.18	476755.52	22101956.16	54013	409.20
36	07-01-2021	391.50	380.00	380.05	481	383.85	184631.85	22286588.01	54494	408.97
37	06-01-2021	389.95	378.30	379.10	928	382.45	354913.60	22641501.61	55422	408.53
38	05-01-2021	394.70	382.00	387.90	941	388.20	365296.20	23006797.81	56363	408.19
39	04-01-2021	395.50	376.00	381.65	4695	384.38	1804664.10	24811461.91	61058	406.36
40	01-01-2021	372.90	366.00	368.55	589	369.15	217429.35	25028891.26	61647	406.00
41	31-12-2020	372.00	362.00	365.25	937	366.42	343335.54	25372226.80	62584	405.41
42	30-12-2020	373.00	353.50	368.40	1194	364.97	435774.18	25808000.98	63778	404.65
43	29-12-2020	371.90	360.00	368.00	349	366.63	127953.87	25935954.85	64127	404.45
44	28-12-2020	365.00	350.20	362.50	470	359.23	168838.10	26104792.95	64597	404.12
45	24-12-2020	361.00	349.95	351.85	923	354.27	326991.21	26431784.16	65520	403.42
46	23-12-2020	357.40	342.00	351.10	858	350.17	300445.86	26732230.02	66378	402.73
47	22-12-2020	354.00	332.05	350.85	464	345.63	160372.32	26892602.34	66842	402.33
48	21-12-2020	363.90	347.00	348.45	437	353.12	154313.44	27046915.78	67279	402.01
49	18-12-2020	360.00	351.00	351.90	539	354.30	190967.70	27237883.48	67818	401.63
50	17-12-2020	367.90	353.00	355.00	918	358.63	329222.34	27567105.82	68736	401.06
51	16-12-2020	364.80	352.15	354.05	838	357.00	299166.00	27866271.82	69574	400.53
52	15-12-2020	370.00	350.00	356.00	1131	358.67	405655.77	28271927.59	70705	399.86
53	14-12-2020	366.00	355.00	363.90	871	361.63	314979.73	28586907.32	71576	399.39
54	11-12-2020	364.00	353.20	356.50	562	357.90	201139.80	28788047.12	72138	399.07
55	10-12-2020	364.90	355.00	356.25	350	358.72	125552.00	28913599.12	72488	398.87
56	09-12-2020	375.00	355.50	357.75	1323	362.75	479918.25	29393517.37	73811	398.23
57	08-12-2020	367.50	355.00	364.45	1143	362.32	414131.76	29807649.13	74954	397.68
58	07-12-2020	367.50	357.50	364.15	760	363.05	275918.00	30083567.13	75714	397.33
59	04-12-2020	359.95	353.20	355.10	346	356.08	123203.68	30206770.81	76060	397.14
60	03-12-2020	360.00	351.50	359.90	881	357.13	314631.53	30521402.34	76941	396.69

For DHP INDIA LIMITED



Place : Kolkata
Date : 10/03/2021

[CA Ashok Kumar Singh]
Chief Financial Officer

Factory : Dhulagarh Industrial Park, P.O. Kanduah, P.S. Sankrail, N.H.-6, Howrah 711 302, West Bengal
Tel : (+91) 76050-00585, 76050-00586

ASHEESH DABRIWAL

ANN-K (1 of 1)

ok
SPEED POST WITH A/D
NO-EW0068139971N
dt 09/03/21

2A/3A, Sapphire
13/2, Ballygunge Park Road
Kolkata – 700 019

Phone No : (033) 2229-5735/7995/9626/7929

Email : asheesh@dhpindia.com

Dated : 09-03-2021

To

- 1) The Listing Department, Department of Corporate Services,
Bombay Stock Exchange Limited [Securities Code No. 531306]
25, P.J.Towers, Dalal Street, Mumbai – 400 001.
- 2) The Secretary,
The Calcutta Stock Exchange Ltd. [Securities Code No. 14058]
7, Lyons Range, Kolkata – 700 001.
- 3) The Company Secretary-cum-Compliance Officer,
DHP INDIA LIMITED [Target Company], 10, Middleton Row, Kolkata – 700 071.

Dear Sir,

RE : ISIN : INE590D01016 – DHP INDIA LIMITED

Subject : Disclosure under Regulation 29(1) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 of Acquisition of 11,45,100 Equity Shares of Target Company [38.17% of total Capital of TC] by way of inter-se-transfer amongst promoters in immediate relative by way of gift from off market transaction- Exempted for Public Announcement and covered u/r.10(1)(a)(i) & (ii) of SEBI (SAST) Regulations, 2011

With reference to the above captioned subject, please find enclosed the copy of form of disclosure as per Regulation 29(1) & Regulation 29(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I Asheesh Dabriwal, Promoter and Managing Director [KMP] of DHP India Limited [CIN : L65921WB1991PLC051555] ("The Company"), resident of 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata – 700 019, hereby submit the disclosure with regard to Acquisition of 11,45,100 Equity Shares [38.17% of Total Capital of Target Company] of DHP India Limited [target Company] on 08-03-2021 by me, treated as inter-se-transfer of shares, within immediate relative, as per Memorandum of Gift executed between :-

- (1) Sri Nirmal Kumar Dabriwala, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 9,65,000 Equity Shares [32.17%] of DHP India Limited [Gift from father to son], and
- (2) Smt. Kumkum Dabriwal, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 1,80,100 Equity Shares [6.00%] of DHP India Limited [Gift from mother to son].

The aforementioned transfer occurred on 08-03-2021 by way of an Off-Market Transaction. This is for your information and record.

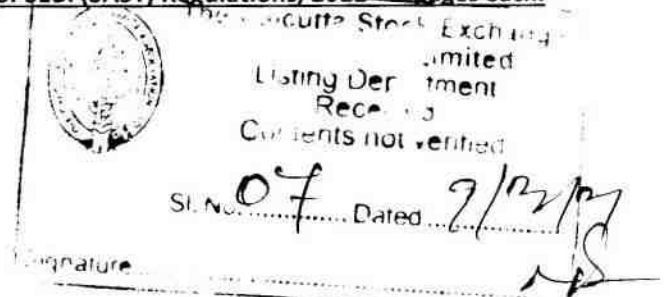
Thanking You,
Yours Faithfully,

asheesh

[ASHEESH DABRIWAL]

Acquirer, Promoter & Managing Director [KMP] of DHP India Limited.

Enclosed : Report Under Regulation 29(1) & 29(2) of SEBI (SAST) Regulations, 2011 – 2 pages each.



ANN-K (2 of 11)

PART - A - Details of the Acquisition

Name of the Target Company (T.C.)	DHP INDIA LIMITED [L65921WB1991PLC051555]		
Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the Acquirer and Enterprises where Key Managerial Personnel (KMP) and their relative have substantial interest and significant influence	Acquirer - Asheesh Dabriwal PAC - Nirmal Kumar Dabriwala Kumkum Dabriwal Anjum Dhandhanania Enterprises where Key Management Personnel and their relative have substantial interest and significant influence i.e. under "Promoter Group" Dabriwala Constructions Private Limited Dolphin Properties Private Limited		
Whether the acquirer belongs to Promoter/Promoter Group	YES		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed.	1) The Calcutta Stock Exchange Ass.Ltd.[Sec.Code-14058] 2) Bombay Stock Exchange Ltd, Mumbai [Sec. Code. 531306]		
Details of the acquisition as follows :-	Number	% w.r.t. total share share/ voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the acquisition under consideration, holding of : acquirer along with PACs of :- Acquirer - Asheesh Dabriwal			
a) Shares carrying voting rights	6,62,600 Equity Share	22.09%	22.09%
b) Shares in the nature of encumbrance (pledge/lien /non-disposal undertaking/others)	NIL	NIL	NIL
c) Voting right (VR) otherwise than by shares	NIL	NIL	NIL
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)	NIL	NIL	NIL
e) Total (a+b+c+d)	6,62,600 Equity Share	22.09%	22.09%
Details of acquisition			
a) Shares carrying voting rights acquired	11,45,100 Equity Shares	38.17%	38.17%
b) VRs acquired otherwise than by Equity Shares	NIL	NIL	NIL
c) Warrants/convertible securities/any other instruments that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired	NIL	NIL	NIL
d) Shareseincumbered/invoked/released by the acquirer	NIL	NIL	NIL
e) Total (a+b+c+d)	11,45,100 Equity Shares	38.17%	38.17%
After the acquisition, holding of acquirer along with PACs of : Acquirer - Asheesh Dabriwal			
a) Shares carrying voting rights acquired	18,07,700 Equity Shares	60.26%	60.26%
b) Shares encumbered with the acquirer	NIL	NIL	NIL
c) VRs acquired otherwise than by Equity Shares	NIL	NIL	NIL
d) Warrants/convertible securities/any other instrumenta that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	NIL	NIL	NIL
e) Total (a+b+c+d)	18,07,700 Equity Shares	60.26%	60.26%
Mode of acquisition (e.g. open market/off-market /public issue/rights issue/preferential allotment/ inter-se-transfer etc.) Salient features of the Securities acquired including time till redemption, ratio at which it can be converted into Equity Shares, etc.	Inter-se-Transfer amongts promoters through an Off Market Transaction covered u/r.10(1)(a)(i) of SEBI (SAST) Regulations, 2011. Not Applicable		
Date of acquisition of/Date of receipt of intimation of allotment of shares/VR/ warrants/convertible securities/any other instruments that entitled the acquirer to receive shares in the TC.	Date of Acquisition : 08/03/2021		

Cont. 2

Date : 09/03/2021
Place : Kolkata

Asheesh
[ASHEESH DABRIWAL]
Acquirer & Promoter

Equity share capital / total voting capital of the TC before the said acquisition	30,00,000 Equity Shares of Rs.10/- each fully paid-up
Equity share capital / total voting capital of the TC after the said acquisition	30,00,000 Equity Shares of Rs.10/- each fully paid-up
Total diluted share/ total voting capital of the TC after the said acquisition	30,00,000 Equity Shares of Rs.10/- each fully paid-up

PART - B (*)**

Name of the Target Company :

Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the acquirer	Whether the acquirer belongs to Promoter/ Promoter Group	PAN of the Acquirer and/or PACs
<u>Acquirer :-</u> Asheesh Dabriwal	YES	ACWPD6237E
<u>PAC : 1)</u> Nirmal Kumar Dabriwala	YES	ACXPD5209M
<u>PAC : 2)</u> Kumkum Dabriwal	YES	ADSPD3512F
<u>PAC : 3)</u> Anjum Dhandhanania	YES	ADIPD6459P
<u>Enterprises where Acquirer have significant influence:-</u>		
1) Dabriwala Constructions Private Limited	YES	AABCD0997R
2) Dolphin Properties Private Limited	YES	AAACD9169Q

Note (*) : Total share capital/voting capital to be taken as per the latest filing done by the Company to the Stock Exchange under Clause 35 of the Listing Agreement and/or respective Regulation of SEBI(LODR).

Note (**) : Diluted share capital/ 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.

Note (***) : Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.

The aforesaid Report under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of acquisition under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Date : 09/03/2021
Place : Kolkata

Asheesh
[ASHEESH DABRIWAL]
Acquirer & Promoter

ANN-K (4 of 11)

Name of the Target Company (T.C.)	DHP INDIA LIMITED [L65921WB1991PLC051555]		
Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the Acquirer and Enterprises where Key Managerial Personnel (KMP) and their relative have substantial interest and significant influence	Acquirer - Asheesh Dabriwal PAC - Nirmal Kumar Dabriwala Kumkum Dabriwal Anjum Dhandhanania Enterprises where Key Management Personnel and their relative have substantial interest and significant influence i.e. under "Promoter Group" Dabriwala Constructions Private Limited Dolphin Properties Private Limited		
Whether the acquirer belongs to Promoter/Promoter Group	YES		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed.	1) The Calcutta Stock Exchange Ass.Ltd.[Sec.Code-14058] 2) Bombay Stock Exchange Ltd, Mumbai [Sec. Code. 531306]		
Details of the acquisition/disposal as follows :-	Number	% w.r.t. total share share/ voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the acquisition under consideration, holding of :			
a) Shares carrying voting rights	6,62,600 Equity Share	22.09%	22.09%
b) Shares in the nature of encumbrance (pledge/lien /non-disposal undertaking/others)	NIL	NIL	NIL
c) Voting right (VR) otherwise than by shares	NIL	NIL	NIL
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)	NIL	NIL	NIL
e) Total (a+b+c+d)	6,62,600 Equity Share	22.09%	22.09%
Details of acquisition			
a) Shares carrying voting rights acquired	11,45,100 Equity Shares	38.17%	38.17%
b) VRs acquired otherwise than by Equity Shares	NIL	NIL	NIL
c) Warrants/convertible securities/any other instruments that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired	NIL	NIL	NIL
d) Shareseincumbered/invoked/released by the acquirer	NIL	NIL	NIL
e) Total (a+b+c+-d)	11,45,100 Equity Shares	38.17%	38.17%
After the acquisition, holding of :			
a) Shares carrying voting rights acquired	18,07,700 Equity Shares	60.26%	60.26%
b) Shares encumbered with the acquirer	NIL	NIL	NIL
c) VRs acquired otherwise than by Equity Shares	NIL	NIL	NIL
d) Warrants/convertible securities/any other instrumenta that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	NIL	NIL	NIL
e) Total (a+b+c+d)	18,07,700 Equity Shares	60.26%	60.26%

Cont. 2

Date : 09/03/2021
Place : Kolkata

asheesh
[ASHEESH DABRIWAL]
Acquirer & Promoter

Continuation FORMAT FOR DISCLOSURES UNDER REGULATION 29(2) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES & TAKEOVERS) REGULATIONS, 2011**Page 2 of 2**

Mode of acquisition (e.g. open market/off-market /public issue/ rights issue/ preferential allotment/ inter-se-transfer etc.)	Inter-se-Transfer amongsts promoters through an Off Market Transaction covered u/r.10(1)(a)(i) of SEBI (SAST) Regulations, 2011.
Date of acquisition of shares/VR or date of receipt of intimation of allotment of shares, whichever is applicable.	Date of Acquisition : 08/03/2021
Equity share capital / total voting capital of the TC before the said acquisition	30,00,000 Equity Shares of Rs.10/- each fully paid-up
Equity share capital / total voting capital of the TC after the said acquisition	30,00,000 Equity Shares of Rs.10/- each fully paid-up
Total diluted share/ total voting capital of the TC after the said acquisition	30,00,000 Equity Shares of Rs.10/- each fully paid-up

Note (*) : Total share capital/voting capital to be taken as per the latest filing done by the Company to the Stock Exchange under Clause 35 of the Listing Agreement and/or respective Regulation of SEBI(LODR).

Note () :** Diluted share capital/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.

The aforesaid Report under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of acquisition under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Date : 09/03/2021

Place : Kolkata

asheesh
[ASHEESH DABRIWAL]
Acquirer & Promoter

d/c

SPEED POST WITH AID
No. EWB068139831N dt-09/03/21

ANN-004

NIRMAL KUMAR DABRIWALA

2A/3A, Sapphire
13/2, Ballygunge Park Road
Kolkata – 700 019
Phone No : 9831725550
Email : nkdabriwala@gmail.com

Dated : 09-03-2021

To

- 1) The Listing Department, Department of Corporate Services,
Bombay Stock Exchange Limited [Securities Code No. 531306]
25, P.J.Towers, Dalal Street, Mumbai – 400 001.
- 2) The Secretary,
The Calcutta Stock Exchange Ltd. [Securities Code No. 14058]
7, Lyons Range, Kolkata – 700 001.
- 3) The Company Secretary-cum-Compliance Officer,
DHP INDIA LIMITED [Target Company], 10, Middleton Row, Kolkata – 700 071.

Dear Sir,

RE : ISIN : INE590D01016 – DHP INDIA LIMITED

Subject : Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 of Sale of 9,65,000 Equity Shares of Target Company [32.17% of total Capital of TC] by way of inter-se-transfer amongst promoters in immediate relative by way of gift from off market transaction- Exempted for Public Announcement and covered u/r.10(1)(a)(i) & (ii) of SEBI (SAST) Regulations, 2011

With reference to the above captioned subject, please find enclosed the copy of form of disclosure as per Regulation 29(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I **Nirmal Kumar Dabriwala**, covered under Promoters Group [Father & Immediate Relative of Promoter & Managing Director – Asheesh Dabriwal] of DHP India Limited [CIN : L65921WB1991PLC051555] ("The Company"), resident of 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata – 700 019, hereby submit the disclosure with regard to **Sale** of 9,65,000 Equity Shares [32.17% of Total Capital of Target Company] of DHP India Limited [target Company] on 08-03-2021 by me, treated as inter-se-transfer of shares, within immediate relative, as per Memorandum of Gift executed between :-

**Sri Nirmal Kumar Dabriwala, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 9,65,000 Equity Shares [32.17%] of DHP India Limited [Gift from father to son].**


The aforementioned transfer occurred on 08-03-2021 by way of an Off-Market Transaction. This is for your information and record.

Thanking You,
Yours Faithfully,


[NIRMAL KUMAR DABRIWALA]

Seller, PAC [Father of Promoter & Managing Director Asheesh Dabriwal of DHP India Limited]

Enclosed : Report Under Regulation 29(2) of SEBI (SAST) Regulations, 2011 – 2 pages.


Listing Department
Received
Contents not verified
Sl. No. 09 Dated 9/3/21
Signature [Signature]

7 of 11

Name of the Target Company (T.C.)	DHP INDIA LIMITED [L65921WB1991PLC051555]		
Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the Acquirer and Enterprises where Key Managerial Personnel (KMP) and their relative have substantial interest and significant influence	Acquirer - Asheesh Dabriwal PAC - Nirmal Kumar Dabriwala Kumkum Dabriwal Anjum Dhandhanania Enterprises where Key Management Personnel and their relative have substantial interest and significant influence i.e. under "Promoter Group" Dabriwala Constructions Private Limited Dolphin Properties Private Limited		
Whether the acquirer belongs to Promoter/Promoter Group	YES		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed.	1) The Calcutta Stock Exchange Ass.Ltd.[Sec.Code-14058] 2) Bombay Stock Exchange Ltd, Mumbai [Sec. Code. 531306]		
Details of the acquisition/disposal as follows :-	Number	% w.r.t. total share share/ voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the sale under consideration, holding of :			
a) Shares carrying voting rights	9,65,000 Equity Share	32.17%	32.17%
b) Shares in the nature of encumbrance (pledge/lien /non-disposal undertaking/others)	NIL	NIL	NIL
c) Voting right (VR) otherwise than by shares	NIL	NIL	NIL
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)	NIL	NIL	NIL
e) Total (a+b+c+d)	9,65,000 Equity Share	32.17%	32.17%
Details of Sale			
a) Shares carrying voting rights acquired	9,65,000 Equity Share	32.17%	32.17%
b) VRs acquired otherwise than by Equity Shares	NIL	NIL	NIL
c) Warrants/convertible securities/any other instruments that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired	NIL	NIL	NIL
d) Shareseincumbered/invoked/released by the acquirer	NIL	NIL	NIL
e) Total (a+b+c+/-d)	9,65,000 Equity Share	32.17%	32.17%
After the sale, holding of :			
a) Shares carrying voting rights acquired	NIL	NIL	NIL
b) Shares encumbered with the acquirer	NIL	NIL	NIL
c) VRs acquired otherwise than by Equity Shares	NIL	NIL	NIL
d) Warrants/convertible securities/any other instrumenta that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	NIL	NIL	NIL
e) Total (a+b+c+d)	NIL	NIL	NIL

Cont. 2

Date : 09/03/2021
Place : Kolkata

[NIRMAL KUMAR DABRIWALA]
Seller & PAC

ANN-K (8 of 11)

Mode of sale (e.g. open market/off-market /public issue/ rights issue/preferential allotment/ inter-se-transfer etc.)	Inter-se-Transfer amongst promoters through an Off Market Transaction covered u/r.10(1)(a)(i) of SEBI (SAST) Regulations, 2011.
Date of sale of shares/VR or date of receipt of intimation of allotment of shares, whichever is applicable.	Date of Sale : 08/03/2021
Equity share capital / total voting capital of the TC before the said sale	30,00,000 Equity Shares of Rs.10/- each fully paid-up
Equity share capital / total voting capital of the TC after the said sale	30,00,000 Equity Shares of Rs.10/- each fully paid-up
Total diluted share/ total voting capital of the TC after the said sale	30,00,000 Equity Shares of Rs.10/- each fully paid-up

Note (*): Total share capital/voting capital to be taken as per the latest filing done by the Company to the Stock Exchange under Clause 35 of the Listing Agreement and/or respective Regulation of SEBI (LODR).

Note (**): Diluted share capital/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.

The aforesaid Report under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of acquisition under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Date : 09/03/2021

Place : Kolkata


[NIRMAL KUMAR DABRIWALA]
Seller & PAC

ANN-K (9 of 11)

KUMKUM DABRIWAL

2A/3A, Sapphire
13/2, Ballygunge Park Road
Kolkata – 700 019
Phone No : 9831096007
Email : kumkumdabriwal@gmail.com

Dated : 09-03-2021

To

- 1) The Listing Department, Department of Corporate Services,
Bombay Stock Exchange Limited [Securities Code No. 531306]
25, P.J.Towers, Dalal Street, Mumbai – 400 001.
- 2) The Secretary,
The Calcutta Stock Exchange Ltd. [Securities Code No. 14058]
7, Lyons Range, Kolkata – 700 001.
- 3) The Company Secretary-cum-Compliance Officer,
DHP INDIA LIMITED [Target Company], 10, Middleton Row, Kolkata – 700 071.

Dear Sir,

RE : ISIN : INE590D01016 – DHP INDIA LIMITED

Subject : Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 of Sale of 1,80,100 Equity Shares of Target Company [6.00% of total Capital of TC] by way of inter-se-transfer amongst promoters in immediate relative by way of gift from off market transaction- Exempted for Public Announcement and covered u/r.10(1)(a)(i) & (ii) of SEBI (SAST) Regulations, 2011

With reference to the above captioned subject, please find enclosed the copy of form of disclosure as per Regulation 29(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I **Kumkum Dabriwal**, covered under Promoters Group [Mother & Immediate Relative of Promoter & Managing Director – Asheesh Dabriwal] of DHP India Limited [CIN : L65921WB1991PLC051555] ("The Company"), resident of 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata – 700 019, hereby submit the disclosure with regard to Sale of 1,80,100 Equity Shares [6.00% of Total Capital of Target Company] of DHP India Limited [target Company] on 08-03-2021 by me, treated as inter-se-transfer of shares, within immediate relative, as per Memorandum of Gift executed between :-

**Smt. Kumkum Dabriwal, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 1,80,100 Equity Shares [6.00%] of DHP India Limited [Gift from mother to son].**

The aforementioned transfer occurred on 08-03-2021 by way of an Off-Market Transaction. This is for your information and record.

Thanking You,

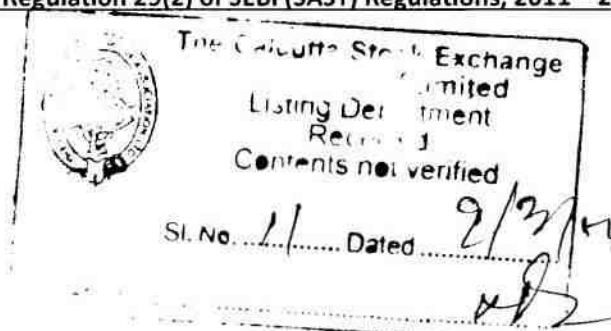
Yours Faithfully,

Kumkum Dabriwal

[KUMKUM DABRIWAL]

Seller, PAC [Mother of Promoter & Managing Director Asheesh Dabriwal of DHP India Limited]

Enclosed : Report Under Regulation 29(2) of SEBI (SAST) Regulations, 2011 – 2 pages.



ANN-X (10 of 11)

Name of the Target Company (T.C.)	DHP INDIA LIMITED [L65921WB1991PLC051555]		
Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the Acquirer and Enterprises where Key Managerial Personnel (KMP) and their relative have substantial interest and significant influence	Acquirer - Asheesh Dabriwal PAC - Nirmal Kumar Dabriwala Kumkum Dabriwal Anjum Dhandhania Enterprises where Key Management Personnel and their relative have substantial interest and significant influence i.e. under "Promoter Group" Dabriwala Constructions Private Limited Dolphin Properties Private Limited		
Whether the acquirer belongs to Promoter/Promoter Group	YES		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed.	1) The Calcutta Stock Exchange Ass.Ltd.{Sec.Code-14058} 2) Bombay Stock Exchange Ltd, Mumbai {Sec. Code. 531306}		
Details of the acquisition/disposal as follows :-	Number	% w.r.t. total share share/ voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the sale under consideration, holding of :			
a) Shares carrying voting rights	1,80,100 Equity Share	6.00%	6.00%
b) Shares in the nature of encumbrance (pledge/lien / non-disposal undertaking/others)	NIL	NIL	NIL
c) Voting right (VR) otherwise than by shares	NIL	NIL	NIL
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)	NIL	NIL	NIL
e) Total (a+b+c+d)	1,80,100 Equity Share	6.00%	6.00%
Details of Sale			
a) Shares carrying voting rights acquired	1,80,100 Equity Share	6.00%	6.00%
b) VRs acquired otherwise than by Equity Shares	NIL	NIL	NIL
c) Warrants/convertible securities/any other instruments that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired	NIL	NIL	NIL
d) Shareseincumbered/invoked/released by the acquirer	NIL	NIL	NIL
e) Total (a+b+c+d)	1,80,100 Equity Share	6.00%	6.00%
After the sale, holding of :			
a) Shares carrying voting rights acquired	NIL	NIL	NIL
b) Shares encumbered with the acquirer	NIL	NIL	NIL
c) VRs acquired otherwise than by Equity Shares	NIL	NIL	NIL
d) Warrants/convertible securities/any other instrumenta that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	NIL	NIL	NIL
e) Total (a+b+c+d)	NIL	NIL	NIL

Cont. 2

Kumkum Dabriwal

Date : 09/03/2021
Place : Kolkata

[KUMKUM DABRIWAL]
Seller & PAC

Mode of sale (e.g. open market/off-market /public issue/rights issue/preferential allotment/inter-se-transfer etc.)	Inter-se-Transfer amongst promoters through an Off Market Transaction covered u/r.10(1)(a)(i) of SEBI (SAST) Regulations, 2011.
Date of sale of shares/VR or date of receipt of intimation of allotment of shares, whichever is applicable.	Date of Sale : 08/03/2021
Equity share capital / total voting capital of the TC before the said sale	30,00,000 Equity Shares of Rs.10/- each fully paid-up
Equity share capital / total voting capital of the TC after the said sale	30,00,000 Equity Shares of Rs.10/- each fully paid-up
Total diluted share/ total voting capital of the TC after the said sale	30,00,000 Equity Shares of Rs.10/- each fully paid-up

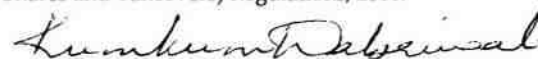
Note (*) : Total share capital/voting capital to be taken as per the latest filing done by the Company to the Stock Exchange under Clause 35 of the Listing Agreement and/or respective Regulation of SEBI(LODR).

Note (**) : Diluted share capital/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.

The aforesaid Report under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of acquisition under Regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Date : 09/03/2021

Place : Kolkata



[KUMKUM DABRIWAL]

Seller & PAC

ASHEESH DABRIWAL

ANN- L (196)

2A/3A, Sapphire
13/2, Ballygunge Park Road
Kolkata – 700 019

Phone No : (033) 2229-5735/7995/9626/7929

Email : asheesh@dhpindia.com

Dated : 09-03-2021

To

- 1) The Listing Department, Department of Corporate Services,
Bombay Stock Exchange Limited [Securities Code No. 531306]
25, P.J.Towers, Dalal Street, Mumbai – 400 001.
- 2) The Secretary,
The Calcutta Stock Exchange Ltd. [Securities Code No. 14058]
7, Lyons Range, Kolkata – 700 001.
- 3) The Company Secretary-cum-Compliance Officer,
DHP INDIA LIMITED [Target Company], 10, Middleton Row, Kolkata – 700 071.

Dear Sir,

RE : ISIN : INE590D01016 – DHP INDIA LIMITED

Subject : Disclosure under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 of Details of change in holding of Securities of Acquirer/Promoters after the aquisition of 11,45,100 Equity Shares of Target Company [38.17% of total Capital of TC] by way of inter-se-transfer amongst promoters in immediate relative by way of gift from off market transaction- Exempted for Public Announcement and covered u/r.10(1)(a)(i) & (ii) of SEBI (SAST) Regulations, 2011

With reference to the above captioned subject, please find enclosed the copy of form of disclosure as per Regulation 7(2) read with Regulation 6(2) – Continual Disclosure of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, I **Asheesh Dabriwal**, Promoter and Managing Director [KMP] of DHP India Limited [CIN : L65921WB1991PLC051555] ("The Company"), resident of 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata – 700 019, hereby submit the disclosure with regard to details of change in holding of Securities of myself as Promoters/Acquirer/Managing Director [KMP] after the **Acquisition** of 11,45,100 Equity Shares [38.17% of Total Capital of Target Company] of DHP India Limited [target Company] on 08-03-2021 by me, treated as inter-se-transfer of shares, within immediate relative, as per Memorandum of Gift executed between :-

- (1) Sri Nirmal Kumar Dabriwala, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 9,65,000 Equity Shares [32.17%] of DHP India Limited [Gift from father to son], and
- (2) Smt. Kumkum Dabriwal, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 1,80,100 Equity Shares [6.00%] of DHP India Limited [Gift from mother to son].

The aforementioned transfer occurred on 08-03-2021 by way of an Off-Market Transaction. This is for your information and record.

Thanking You,
Yours Faithfully,

Asheesh
[ASHEESH DABRIWAL]

Acquirer, Promoter & Managing Director [KMP] of DHP India Limited

Enclosed : Report Under Regulation 7(2) SEBI, Insider Trading Regulations, 2015 - 1 page

Listing Department	Exempted
Records	Limited
Comments not verified	
Sr. No. <i>06</i>	Dated <i>7/3/21</i>
Signature <i>Asheesh</i>	

Securities and Exchange Board of India

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (2) read with Regulation 6 (2) - Continual disclosure]

Name of the company : **DHP INDIA LIMITED [CIN : L65921WB1991PLC051555]**

ISIN of the Company : **INE 590D 01016**

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons as mentioned in Regulation 6 (2).

Name, PAN, CIN/DIN & address with Contact nos.	Category of Person (Promoter/ Member of the Promoter Group/ designated person/ Directors/Immediate Relative to/ Others etc.)	Securities held prior to acquisition		Securities acquired				Securities held post acquisition		Date of allotment advice /acquisition of shares/ disposal of shares, specify		Date of intimation to company	Mode of acquisition/ disposal (on market/ public/rights/preferential offer / off-market/ Inter-se-transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of Securities (For eg. Shares, Warrants, Convertible Debentures, Right Entitlements etc)	No. and % of share holding	Type of Securities (For eg. Shares, Warrants, Convertible Debentures, Right Entitlements etc)	No.	Value	Transaction Type (Purchase/Sale/Sale Pledge/Revocation/ Invocation/Others- please specify)	Type of Securities (For eg. Shares, Warrants, Convertible Debentures, Right Entitlements etc)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Asheesh Dabriwal PAN : ACWPD6237E DIN : 00044783 Address : 2A/3A, Sapphire 13/2, Ballygunge Park Road, Kolkata - 700 019. Contact No.(033)22295735 (033)22297995 asheesh@dhpindia.com	Promoter and Managing Director of the Company	Equity Shares	6,62,600 Equity Shares [22.09 %] of Total Share Capital of TC	Equity Shares	11,45,100	Not Applicable shares trf. to Relative by way of GIFT. However the Offer Price as per Valuation @Rs.396.69 i.e. Rs.45,42,49,719	Purchase by way of Inter-se-transfer amongst promoters by way of Gift to Immediate relative U/r.10(1)(a) of the SEBI (Takeover) Regulations, 2011	Equity Shares	18,07,700 Equity Shares [60.26 %] of Total Share Capital of TC	08-03-2021	08-03-2021	09-03-2021	Off-Market Transaction by way of Gift Made to immediate relative covered as Inter-se-transfer amongst promoters U/r.10(1)(a)(i)	Not Applicable Off-Market Transaction

Note: (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015

(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22
Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ No: Applicable

Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.

Name & Signature:

Designation:

Date:

asheesh
[ASHEESH DABRIWAL]

Acquirer, Promoter and Managing Director of The Target Company [DHP INDIA LIMITED]

09-03-2021

Place: Kolkata

OK
NIRMAL KUMAR DABRIWALA

ANN-L (3 of 6)

2A/3A, Sapphire
13/2, Ballygunge Park Road
Kolkata – 700 019
Phone No : 9831725550
Email : nkdabriwala@gmail.com

Dated : 09-03-2021

To

- 1) The Listing Department, Department of Corporate Services,
Bombay Stock Exchange Limited [Securities Code No. 531306]
25, P.J.Towers, Dalal Street, Mumbai – 400 001.
- 2) The Secretary,
The Calcutta Stock Exchange Ltd. [Securities Code No. 14058]
7, Lyons Range, Kolkata – 700 001.
- 3) The Company Secretary-cum-Compliance Officer,
DHP INDIA LIMITED [Target Company], 10, Middleton Row, Kolkata – 700 071.

Dear Sir,

RE : ISIN : INE590D01016 – DHP INDIA LIMITED

Subject : Disclosure under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 of Details of change in holding of Securities of Seller/Promoters Group after the Sale of 9,65,000 Equity Shares of Target Company [32.17% of total Capital of TC] by way of inter-se-transfer amongst promoters in immediate relative by way of gift from off market transaction- Exempted for Public Announcement and covered u/r.10(1)(a)(i) & (ii) of SEBI (SAST) Regulations, 2011

With reference to the above captioned subject, please find enclosed the copy of form of disclosure as per Regulation 7(2) read with Regulation 6(2) – Continual Disclosure of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, I **Nirmal Kumar Dabriwala**, covered under Promoters Group [Father & Immediate Relative of Promoter & Managing Director – Asheesh Dabriwal] of DHP India Limited [CIN : L65921WB1991PLC051555] ("The Company"), resident of 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata – 700 019, hereby submit the disclosure with regard to details of change in holding of Securities of myself as under Promoters Group/Seller after the Sale of 9,65,000 Equity Shares [32.17% of Total Capital of Target Company] of DHP India Limited [target Company] on 08-03-2021 by me, treated as inter-se-transfer of shares, within immediate relative, as per Memorandum of Gift executed between :-

Sri Nirmal Kumar Dabriwala, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/Transferee of 9,65,000 Equity Shares [32.17%] of DHP India Limited [Gift from father to son].

The aforementioned transfer occurred on 08-03-2021 by way of an Off-Market Transaction. This is for your information and record.

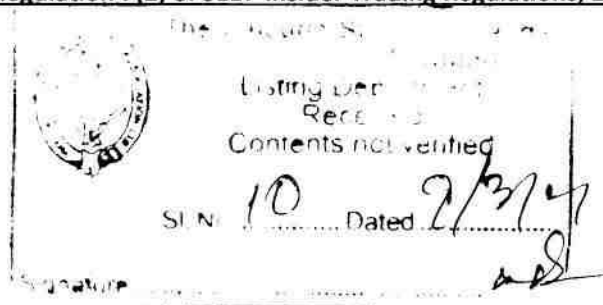
Thanking You,

Yours Faithfully,


[NIRMAL KUMAR DABRIWALA]

Seller, PAC [Father of Promoter & Managing Director Asheesh Dabriwal of DHP India Limited]

Enclosed : Report Under Regulation 7(2) of SEBI Insider Trading Regulations, 2015 – 1 page.



Securities and Exchange Board of India

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (2) read with Regulation 6 (2) - Continual disclosure]

Name of the company : **DHP INDIA LIMITED** [CIN : L65921WB1991PLC051555]

ISIN of the Company : **INE 590D 01016**

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons as mentioned in Regulation 6 (2).

Name, PAN, CIN/DIN & address with Contact nos.	Category of Person (Promoter/ Member of the Promoter Group/ designated person/ Directors/Immediate Relative to/ Others etc.)	Securities held prior to disposal		Securities Disposed				Securities held post disposal		Date of allotment advice /acquisition of shares/ disposal of shares, specify		Date of intimation to company	Mode of acquisition/ disposal (on market/ public/rights/preferential offer / off market/ Inter-se-transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of Securities (For eg. Shares, Warrants, Convertible Debentures, Right Entitlements etc)	No. and % of share holding	Type of Securities (For eg. Shares, Warrants, Convertible Debentures, Right Entitlements etc)	No.	Value	Transaction Type (Purchase/Sale/Sale Pledge/Revocation/ Invocation/Others- please specify)	Type of Securities (For eg. Shares, Warrants, Convertible Debentures, Right Entitlements etc)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Nirmal Kumar Dabriwala PAN : ACXPD5209M DIN : 00047543 Address : 2A/3A, Sapphire 13/2, Ballygunge Park Road, Kolkata - 700 019. Contact No.(033)22295735 (033)22297995 nkdbriwala@gmail.com	Immediate Relative (Father of Promoter Asheesh Dabriwal) also covered under the Promoters Group	Equity Shares	9,65,000 Equity Shares [32.17 %] of Total Share Capital of TC	Equity Shares	9,65,000	Not Applicable shares trf. to Relative by way of GIFT. However the Offer Price as per Valuation @Rs.396.69 i.e. Rs.38,28,05,850	Sold by way of Inter-se-transfer amongst promoters by way of Gift to immediate relative U/r.10(1)(a) of the SEBI (Takeover) Regulations, 2011	Equity Shares	NIL Share [Nil %]	08-03-2021	08-03-2021	09-03-2021	Off-Market Transaction by way of Gift Made to immediate relative covered as Inter-se-transfer amongst promoters U/r.10(1)(a)(i)	Not Applicable Off-Market Transaction

Note: (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015

(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22
Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable

Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.

Name & Signature:

[NIRMAL KUMAR DABRIWALA]

Designation:

Seller, Immediate Relative of Promoter and also under Promoters Group of The Target Company [DHP INDIA LIMITED]

Date:

09-03-2021

Place:

Kolkata

KUMKUM DABRIWAL

ANN- L (546)

2A/3A, Sapphire
13/2, Ballygunge Park Road
Kolkata – 700 019
Phone No : 9831096007
Email : kumkumdabriwal@gmail.com

Dated : 09-03-2021

To

- 1) The Listing Department, Department of Corporate Services,
Bombay Stock Exchange Limited [Securities Code No. 531306]
25, P.J.Towers, Dalal Street, Mumbai – 400 001.
- 2) The Secretary,
The Calcutta Stock Exchange Ltd. [Securities Code No. 14058]
7, Lyons Range, Kolkata – 700 001.
- 3) The Company Secretary-cum-Compliance Officer,
DHP INDIA LIMITED [Target Company], 10, Middleton Row, Kolkata – 700 071.

Dear Sir,

RE : ISIN : INE590D01016 – DHP INDIA LIMITED

Subject : Disclosure under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 of Details of change in holding of Securities of Seller/Promoters Group after the Sale of 1,80,100 Equity Shares of Target Company [6.00% of total Capital of TC] by way of inter-se-transfer amongst promoters in immediate relative by way of gift from off market transaction- Exempted for Public Announcement and covered u/r.10(1)(a)(i) & (ii) of SEBI (SAST) Regulations, 2011

With reference to the above captioned subject, please find enclosed the copy of form of disclosure as per Regulation 7(2) read with Regulation 6(2) – Continual Disclosure of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, I Kumkum Dabriwal, covered under Promoters Group [Mother & Immediate Relative of Promoter & Managing Director – Asheesh Dabriwal] of DHP India Limited [CIN : L65921WB1991PLC051555] ("The Company"), resident of 2A/3A, Sapphire, 13/2, Ballygunge Park Road, Kolkata – 700 019, hereby submit the disclosure with regard to details of change in holding of Securities of myself as under Promoters Group/Seller after the Sale of 1,80,100 Equity Shares [6.00% of Total Capital of Target Company] of DHP India Limited [target Company] on 08-03-2021 by me, treated as inter-se-transfer of shares, within immediate relative, as per Memorandum of Gift executed between :-

**Smt. Kumkum Dabriwal, the Donor/Transferor and Sri Asheesh Dabriwal, the Donee/
Transferee of 1,80,100 Equity Shares [6.00%] of DHP India Limited [Gift from mother to son].**

The aforementioned transfer occurred on 08-03-2021 by way of an Off-Market Transaction. This is for your information and record.

Thanking You,
Yours Faithfully,

Kumkum Dabriwal

[KUMKUM DABRIWAL]

Seller, PAC [Mother of Promoter & Managing Director Asheesh Dabriwal of DHP India Limited]

Enclosed : Report Under Regulation 7(2) of SEBI Insider Trading Regulations, 2015 – 1 page.

The Calcutta Stock Exchange Limited	
Listing Department	
Receipt	
Contents not verified	
Sl. No. 12	Dated 9/3/21
Signature _____	

Securities and Exchange Board of India

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (2) read with Regulation 6 (2) - Continual disclosure]

Name of the company : **DHP INDIA LIMITED [CIN : L65921WB1991PLC051555]**

ISIN of the Company : **INE 590D 01016**

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons as mentioned in Regulation 6 (2).

Name, PAN, CIN/DIN & address with Contact nos.	Category of Person (Promoter/ Member of the Promoter Group/ designated person/ Directors/Immediate Relative to/ Others etc.)	Securities held prior to disposal		Securities Disposed				Securities held post disposal		Date of allotment advice /acquisition of shares/ disposal of shares, specify		Date of intimation to company	Mode of acquisition/ disposal (on market/ public/rights/preferential offer / off market/ Inter-se-transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of Securities (For eg. Shares, Warrants, Convertible Debentures, Right Entitlements etc)	No. and % of share holding	Type of Securities (For eg. Shares, Warrants, Convertible Debentures, Right Entitlements etc)	No.	Value	Transaction Type (Purchase/Sale/Sale Pledge/Revocation/ Invocation/Others- please specify)	Type of Securities (For eg. Shares, Warrants, Convertible Debentures, Right Entitlements etc)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Kumkum Dabriwal PAN : ADSPD3512F DIN : 00047591 Address : 2A/3A, Sapphire 13/2, Ballygunge Park Road, Kolkata - 700 019. Contact No.(033)22295735 (033)22297995 kumkumdabriwal@gmail.com	Immediate Relative (Mother of Promoter Asheesh Dabriwal) also covered under the Promoters Group	Equity Shares	1,80,100 Equity Shares [6.00 %] of Total Share Capital of TC	Equity Shares	1,80,100	Not Applicable shares trf. to Relative by way of GIFT. However the Offer Price as per Valuation @Rs.396.69 i.e. Rs.7,14,43,869	Sold by way of Inter-se-transfer amongst promoters by way of Gift to immediate relative U/r.10(1)(a) of the SEBI (Takeover) Regulations, 2011	Equity Shares	NIL Share [NIL %]	08-03-2021	08-03-2021	09-03-2021	Off-Market Transaction by way of Gift Made to immediate relative covered as: Inter-se-transfer amongst promoters U/r.10(1)(a)(i)	Not Applicable Off-Market Transaction

Note: (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015

(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22
Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable	Nil/ Not Applicable

Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.

Name & Signature:

[KUMKUM DABRIWAL]

Designation:

Seller, Immediate Relative of Promoter and also under Promoters Group of The Target Company [DHP INDIA LIMITED]

Date:

09-03-2021

Place:

Kolkata

From :

Asheesh Dabriwal

2A/3A, Sapphire, 13/2, Ballygunge Park Road,

Kolkata - 700 019.

Phone : (033) 2229-5735/7995/9626/7929

Table : A (Page 1 of 2)

Date : 10/03/2021

ANN - 'M' (182)

DECLARATION

Re : DHP INDIA LIMITED

I hereby declare that all the relevant requirement of Chapter V of the Takeover Regulations, 2011 e.g. regulation Regulation - 29(1), 29(2), 30(1), 30(2), 10(5) & 10(6) of SEBI(SAST) Regulations, 2011 and corresponding provisions of the repealed Takeover Reg., 1997 e.g. regulation No. 6(1), 6(3), 8(1), 8(2), 8A(1), 8A(2), 7(1), 7(2), 7(1A) & 7(2A) of SEBI (SAST) Regulations, 1997, complied within time limit to the above mentioned Company and similarly to the all Stock Exchanges are as below :-

The details of all disclosures complied since 20/02/1997 is as below in TABLE - A [Transferee Report]

TABLE - A : Compliance of Transferees under these Regulation since inception.						
Sl.No.	Regulation/ Sub-regulation	Due date for compliance as mentioned in the regulation	Actual date of compliance	Delay, if any (in no. of days) Col 4 - col 3	Remarks	
[1]	[2]	[3]	[4]	[5]	[6]	
Regulation 6(1)/6(3) of Old SEBI(SAST) Regulations, 1997 thereafter Regulation 29(1)/29(2) of SEBI (SAST) Regulations, 2011						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	6(1)	20/04/1997	10/04/1997	Nil	No delay	
2	6(3)	20/04/1997	10/04/1997	Nil	No delay	
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
3	29(1)/29(2)	10/03/2021	09/03/2021	Nil	No delay	
Reg. 8(1)/8(2)/8A(1)/8A(2) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 30(1)/30(2) of SEBI (SAST) Regulations, 2011						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	8(1)/8(2)	for : 31/03/1997	21/04/1997	10/04/1997	Nil	No delay
2		for : 31/03/1998	21/04/1998	18/04/1998	Nil	No delay
3		for : 31/03/1999	21/04/1999	16/04/1999	Nil	No delay
4		for : 31/03/2000	21/04/2000	17/04/2000	Nil	No delay
5		for : 31/03/2001	21/04/2001	16/04/2001	Nil	No delay
6		for : 31/03/2002	21/04/2002	17/04/2002	Nil	No delay
7		for : 31/03/2003	21/04/2003	09/04/2003	Nil	No delay
8		for : 31/03/2004	21/04/2004	02/04/2004	Nil	No delay
9		for : 31/03/2005	21/04/2005	11/04/2005	Nil	No delay
10		for : 31/03/2006	21/04/2006	01/04/2006	Nil	No delay
11		for : 31/03/2007	21/04/2007	02/04/2007	Nil	No delay
12		for : 31/03/2008	21/04/2008	02/04/2008	Nil	No delay
13	8(1)/8(2)	for : 31/03/2009	21/04/2009	08/04/2009	Nil	No delay
14	and	for : 31/03/2010	21/04/2010	08/04/2010	Nil	No delay
15	8A(1)/8A(2)	for : 31/03/2011	21/04/2011	07/04/2011	Nil	No delay
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
16	30(1)/30(2)	for : 31/03/2012	21/04/2012	02/04/2012	Nil	No delay
17		for : 31/03/2013	21/04/2013	05/04/2013	Nil	No delay
18		for : 31/03/2014	21/04/2014	04/04/2014	Nil	No delay
19		for : 31/03/2015	21/04/2015	06/04/2015	Nil	No delay
20		for : 31/03/2016	21/04/2016	05/04/2016	Nil	No delay

Cont. page 2

Place : Kolkata

Date : 10/03/2021.


Asheesh
ASHEESH DABRIWAL
 Acquirer & Promoter

TABLE - A : Compliance of Transferees under these Regulation since inception.						
Sl.No.	Regulation/ Sub-regulation	Due date for compliance as	Actual date of compliance	Delay, if any (in no. of days)	Remarks	
Reg. 8(1)/8(2)/8A(1)/8A(2) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 30(1)/30(2) of SEBI (SAST) Regulations, 2011						
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
21	30(1)/30(2)	for : 31/03/2017	21/04/2017	05/04/2017	Nil	No delay
22		for : 31/03/2018	21/04/2018	06/04/2018	Nil	No delay
23		for : 31/03/2019	21/04/2019	03/04/2019	Nil	No delay
24		for : 31/03/2020	01/06/2020	19/05/2020	Nil	No delay
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
25	8(2)	RD : 23/07/1997	13/08/1997	11/08/1997	Nil	No delay
26		RD : 05/09/1998	26/09/1998	22/09/1998	Nil	No delay
27		RD : 23/07/1999	13/08/1999	05/08/1999	Nil	No delay
28		RD : 23/08/2000	13/09/2000	08/09/2000	Nil	No delay
29		RD : 23/08/2001	13/09/2001	10/09/2001	Nil	No delay
30		RD : 23/08/2002	13/09/2002	02/09/2002	Nil	No delay
31		RD : 23/08/2003	13/09/2003	01/09/2003	Nil	No delay
32		RD : 23/08/2004	13/09/2004	31/08/2004	Nil	No delay
33		RD : 23/08/2005	13/09/2005	01/09/2005	Nil	No delay
34		RD : 23/08/2006	13/09/2006	01/09/2006	Nil	No delay
35		RD : 23/08/2007	13/09/2007	03/09/2007	Nil	No delay
36		RD : 22/08/2008	12/09/2008	01/09/2008	Nil	No delay
37	8(2)/8A(2)	RD : 22/08/2009	12/09/2009	01/09/2009	Nil	No delay
38		RD : 21/08/2010	11/09/2010	31/08/2010	Nil	No delay
39		RD : 27/08/2011	17/09/2011	27/08/2011	Nil	No delay
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
40	30(2)	RD : 01/09/2012	22/09/2012	07/09/2012	Nil	No delay
41		RD : 14/09/2013	05/10/2013	23/09/2013	Nil	No delay
42		RD : 13/09/2014	04/10/2014	15/09/2014	Nil	No delay
43		RD : 28/09/2015	19/10/2015	28/09/2015	Nil	No delay
44		RD : 19/09/2016	10/10/2016	19/09/2016	Nil	No delay
45		RD : 20/09/2017	11/10/2017	20/09/2017	Nil	No delay
46		RD : 24/09/2018	15/10/2018	24/09/2018	Nil	No delay
47		RD : 20/09/2019	11/10/2019	20/09/2019	Nil	No delay
48		RD : 28/09/2020	19/10/2020	28/09/2020	Nil	No delay
Reg.7(1)/7(2)/7(1A)/7(2A) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 10(5)/10(6) of SEBI (SAST) Regulations, 2011						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	7(1) & 7(2)	29/09/2002	25/09/2002 & 26/09/2002	Nil	Acquisition of Shares on 25/09/2002	
2	7(1A) & 7(2A)	17/01/2003	16/01/2003	Nil	Acquisition of Shares on 15/01/2003	
3	7(1) & 7(2), and 7(1A) & 7(2A)	30/04/2008	29/04/2008	Nil	Acquisition of Shares on 28/04/2008	
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
4	Before Acquisition Regulation : 10(5)	01/03/2021	01/03/2021	Nil	Acquisition of Shares on 08/03/2021	
5	After Acquisition Regulation : 10(6)	12/03/2021	09/03/2021	Nil	Acquisition of Shares on 08/03/2021	

Notes : RD means Record Date for the purpose of dividend.

Place : Kolkata

Date : 10/03/2021.


 ASHEESH DABRIWAL
 Acquirer & Promoter

From :

Nirmal Kumar Dabriwala

2A/3A, Sapphire, 13/2, Ballygunge Park Road,

Kolkata - 700 019.

Phone : (033) 2229-5735/7995/9626/7929

Table : B (Page 1 of 2)

Date : 10/03/2021

Ann-N (184)

DECLARATION
TO WHOM IT MAY CONCERN
Re : DHP INDIA LIMITED.

I hereby declare that all the relevant requirement of Chapter V of the Takeover Regulations, 2011 e.g. regulation Regulation - 29(2), 30(1) & 30(2) of SEBI(SAST) Regulations, 2011 and corresponding provisions of the repealed Takeover Regulation, 1997 e.g. regulation No. 6(1), 6(3), 8(1), 8(2), 8A(1), 8A(2), 7(1), 7(2), 7(1A) & 7(2A) of SEBI (SAST) Regulations, 1997, complied within time limit to the above mentioned Company and similarly to the all Stock Exchanges are as below :-

The details of all disclosures complied since 20/02/1997 is as below in TABLE - B [Transferor Report]

TABLE - B : Compliance of Transferors under these Regulation since inception.						
Sl.No.	Reg # of Captioned regulations	Due date as mentioned in the reg.	Actual date of compliance	Delay, if any (in no. of days) Col 4 - col 3	Remarks	
[1]	[2]	[3]	[4]	[5]	[6]	
Regulation 6(1)/6(3) of Old SEBI(SAST) Regulations, 1997 thereafter Regulation 29(2) of SEBI (SAST) Regulations, 2011						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	6(1)	20/04/1997	10/04/1997	Nil	No delay	
2	6(3)	20/04/1997	10/04/1997	Nil	No delay	
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
3	29(2)	10/03/2021	09/03/2021	Nil	No delay	
Reg. 8(1)/8(2)/8A(1)/8A(2) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 30(1)/30(2) of SEBI (SAST) Regulations, 2011						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	8(1)/8(2)	for : 31/03/1997	21/04/1997	10/04/1997	Nil	No delay
2		for : 31/03/1998	21/04/1998	18/04/1998	Nil	No delay
3		for : 31/03/1999	21/04/1999	16/04/1999	Nil	No delay
4		for : 31/03/2000	21/04/2000	17/04/2000	Nil	No delay
5		for : 31/03/2001	21/04/2001	16/04/2001	Nil	No delay
6		for : 31/03/2002	21/04/2002	17/04/2002	Nil	No delay
7		for : 31/03/2003	21/04/2003	09/04/2003	Nil	No delay
8		for : 31/03/2004	21/04/2004	02/04/2004	Nil	No delay
9		for : 31/03/2005	21/04/2005	11/04/2005	Nil	No delay
10		for : 31/03/2006	21/04/2006	01/04/2006	Nil	No delay
11		for : 31/03/2007	21/04/2007	02/04/2007	Nil	No delay
12		for : 31/03/2008	21/04/2008	02/04/2008	Nil	No delay
13	8(1)/8(2)	for : 31/03/2009	21/04/2009	08/04/2009	Nil	No delay
14	and	for : 31/03/2010	21/04/2010	08/04/2010	Nil	No delay
15	8A(1)/8A(2)	for : 31/03/2011	21/04/2011	07/04/2011	Nil	No delay
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
16	30(1)/30(2)	for : 31/03/2012	21/04/2012	02/04/2012	Nil	No delay
17		for : 31/03/2013	21/04/2013	05/04/2013	Nil	No delay
18		for : 31/03/2014	21/04/2014	04/04/2014	Nil	No delay
19		for : 31/03/2015	21/04/2015	06/04/2015	Nil	No delay
20		for : 31/03/2016	21/04/2016	05/04/2016	Nil	No delay

Cont. page 2

Place : Kolkata

Date : 10/03/2021.

Nirmal Kumar Dabriwala

Seller & PAC

Continuation of details of all disclosures complied since 20/02/1997 is as below in TABLE - A (Transferor Report)

TABLE - B : Compliance of Transferor under these Regulation since inception.						
Sl.No.	Regulation/ Sub-regulation	Due date for compliance as	Actual date of compliance	Delay, if any (in no. of days)	Remarks	
Reg. 8(1)/8(2)/8A(1)/8A(2) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 30(1)/30(2) of SEBI (SAST) Regulations, 2011						
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
21	30(1)/30(2)	for : 31/03/2017	21/04/2017	05/04/2017	Nil	No delay
22		for : 31/03/2018	21/04/2018	06/04/2018	Nil	No delay
23		for : 31/03/2019	21/04/2019	03/04/2019	Nil	No delay
24		for : 31/03/2020	01/06/2020	19/05/2020	Nil	No delay
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
25	8(2)	RD : 23/07/1997	13/08/1997	11/08/1997	Nil	No delay
26		RD : 05/09/1998	26/09/1998	22/09/1998	Nil	No delay
27		RD : 23/07/1999	13/08/1999	05/08/1999	Nil	No delay
28		RD : 23/08/2000	13/09/2000	08/09/2000	Nil	No delay
29		RD : 23/08/2001	13/09/2001	10/09/2001	Nil	No delay
30		RD : 23/08/2002	13/09/2002	02/09/2002	Nil	No delay
31		RD : 23/08/2003	13/09/2003	01/09/2003	Nil	No delay
32		RD : 23/08/2004	13/09/2004	31/08/2004	Nil	No delay
33		RD : 23/08/2005	13/09/2005	01/09/2005	Nil	No delay
34		RD : 23/08/2006	13/09/2006	01/09/2006	Nil	No delay
35		RD : 23/08/2007	13/09/2007	03/09/2007	Nil	No delay
36		RD : 22/08/2008	12/09/2008	01/09/2008	Nil	No delay
37	8(2)/8A(2)	RD : 22/08/2009	12/09/2009	01/09/2009	Nil	No delay
38		RD : 21/08/2010	11/09/2010	31/08/2010	Nil	No delay
39		RD : 27/08/2011	17/09/2011	27/08/2011	Nil	No delay
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
40	30(2)	RD : 01/09/2012	22/09/2012	07/09/2012	Nil	No delay
41		RD : 14/09/2013	05/10/2013	23/09/2013	Nil	No delay
42		RD : 13/09/2014	04/10/2014	15/09/2014	Nil	No delay
43		RD : 28/09/2015	19/10/2015	28/09/2015	Nil	No delay
44		RD : 19/09/2016	10/10/2016	19/09/2016	Nil	No delay
45		RD : 20/09/2017	11/10/2017	20/09/2017	Nil	No delay
46		RD : 24/09/2018	15/10/2018	24/09/2018	Nil	No delay
47		RD : 20/09/2019	11/10/2019	20/09/2019	Nil	No delay
48		RD : 28/09/2020	19/10/2020	28/09/2020	Nil	No delay
Regulation 7(1)/7(2)/7(1A)/7(2A) of Old SEBI(SAST) Regulations, 1997						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	7(1) & 7(2)	29/09/2002	25/09/2002 & 26/09/2002	Nil	Acquisition of Shares on 25/09/2002	
2	7(1A) & 7(2A)	17/01/2003	16/01/2003	Nil	Acquisition of Shares on 15/01/2003	

Place : Kolkata

Date : 10/03/2021.

Nirmal Kumar Dabriwala

Seller & PAC

From :

Kumkum Dabriwal
2A/3A, Sapphire, 13/2, Ballygunge Park Road,
Kolkata - 700 019.
Phone : (033) 2229-5735/7995/9626/7929

Table : C (Page 1 of 2)

Date : 10/03/2021

ANN-N(3084)

DECLARATION
TO WHOM IT MAY CONCERN
Re : DHP INDIA LIMITED.

I hereby declare that all the relevant requirement of Chapter V of the Takeover Regulations, 2011 e.g. regulation Regulation - 29(2), 30(1) & 30(2) of SEBI(SAST) Regulations, 2011 and corresponding provisions of the repealed Takeover Regulation, 1997 e.g. regulation No. 6(1), 6(3), 8(1), 8(2), 8A(1), 8A(2), 7(1) & 7(2) of SEBI (SAST) Regulations, 1997, complied within time limit to the above mentioned Company and similarly to the all Stock Exchanges are as below :-

The details of all disclosures complied since 20/02/1997 is as below in TABLE - C [Transferor Report]

TABLE - C : Compliance of Transferors under these Regulation since inception.						
Sl.No.	Reg # of Captioned regulations	Due date as mentioned in the reg.	Actual date of compliance	Delay, if any (in no. of days) Col 4 - col 3	Remarks	
[1]	[2]	[3]	[4]	[5]	[6]	
Regulation 6(1)/6(3) of Old SEBI(SAST) Regulations, 1997 thereafter Regulation 29(2) of SEBI (SAST) Regulations, 2011						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	6(1)	20/04/1997	10/04/1997	Nil	No delay	
2	6(3)	20/04/1997	10/04/1997	Nil	No delay	
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
3	29(2)	10/03/2021	09/03/2021	Nil	No delay	
Reg. 8(1)/8(2)/8A(1)/8A(2) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 30(1)/30(2) of SEBI (SAST) Regulations, 2011						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	8(1)/8(2)	for : 31/03/1997	21/04/1997	10/04/1997	Nil	No delay
2		for : 31/03/1998	21/04/1998	18/04/1998	Nil	No delay
3		for : 31/03/1999	21/04/1999	16/04/1999	Nil	No delay
4		for : 31/03/2000	21/04/2000	17/04/2000	Nil	No delay
5		for : 31/03/2001	21/04/2001	16/04/2001	Nil	No delay
6		for : 31/03/2002	21/04/2002	17/04/2002	Nil	No delay
7		for : 31/03/2003	21/04/2003	09/04/2003	Nil	No delay
8		for : 31/03/2004	21/04/2004	02/04/2004	Nil	No delay
9		for : 31/03/2005	21/04/2005	11/04/2005	Nil	No delay
10		for : 31/03/2006	21/04/2006	01/04/2006	Nil	No delay
11		for : 31/03/2007	21/04/2007	02/04/2007	Nil	No delay
12		for : 31/03/2008	21/04/2008	02/04/2008	Nil	No delay
13	8(1)/8(2)	for : 31/03/2009	21/04/2009	08/04/2009	Nil	No delay
14	and	for : 31/03/2010	21/04/2010	08/04/2010	Nil	No delay
15	8A(1)/8A(2)	for : 31/03/2011	21/04/2011	07/04/2011	Nil	No delay
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
16	30(1)/30(2)	for : 31/03/2012	21/04/2012	02/04/2012	Nil	No delay
17		for : 31/03/2013	21/04/2013	05/04/2013	Nil	No delay
18		for : 31/03/2014	21/04/2014	04/04/2014	Nil	No delay
19		for : 31/03/2015	21/04/2015	06/04/2015	Nil	No delay
20		for : 31/03/2016	21/04/2016	05/04/2016	Nil	No delay

Cont. page 2

Place : Kolkata
Date : 10/03/2021.

Kumkum Dabriwal
Kumkum Dabriwal
Seller & PAC

Continuation of details of all disclosures complied since 20/02/1997 is as below in TABLE - C [Transferor Report]

TABLE - C : Compliance of Transferor under these Regulation since inception.						
Sl.No.	Regulation/ Sub-regulation	Due date for compliance as	Actual date of compliance	Delay, if any (in no. of days)	Remarks	
Reg. 8(1)/8(2)/8A(1)/8A(2) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 30(1)/30(2) of SEBI (SAST) Regulations, 2011						
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
21	30(1)/30(2)	for : 31/03/2017	21/04/2017	05/04/2017	Nil	No delay
22		for : 31/03/2018	21/04/2018	06/04/2018	Nil	No delay
23		for : 31/03/2019	21/04/2019	03/04/2019	Nil	No delay
24		for : 31/03/2020	01/06/2020	19/05/2020	Nil	No delay
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
25	8(2)	RD : 23/07/1997	13/08/1997	11/08/1997	Nil	No delay
26		RD : 05/09/1998	26/09/1998	22/09/1998	Nil	No delay
27		RD : 23/07/1999	13/08/1999	05/08/1999	Nil	No delay
28		RD : 23/08/2000	13/09/2000	08/09/2000	Nil	No delay
29		RD : 23/08/2001	13/09/2001	10/09/2001	Nil	No delay
30		RD : 23/08/2002	13/09/2002	02/09/2002	Nil	No delay
31		RD : 23/08/2003	13/09/2003	01/09/2003	Nil	No delay
32		RD : 23/08/2004	13/09/2004	31/08/2004	Nil	No delay
33		RD : 23/08/2005	13/09/2005	01/09/2005	Nil	No delay
34		RD : 23/08/2006	13/09/2006	01/09/2006	Nil	No delay
35		RD : 23/08/2007	13/09/2007	03/09/2007	Nil	No delay
36		RD : 22/08/2008	12/09/2008	01/09/2008	Nil	No delay
37	8(2)/8A(2)	RD : 22/08/2009	12/09/2009	01/09/2009	Nil	No delay
38		RD : 21/08/2010	11/09/2010	31/08/2010	Nil	No delay
39		RD : 27/08/2011	17/09/2011	27/08/2011	Nil	No delay
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
40	30(2)	RD : 01/09/2012	22/09/2012	07/09/2012	Nil	No delay
41		RD : 14/09/2013	05/10/2013	23/09/2013	Nil	No delay
42		RD : 13/09/2014	04/10/2014	15/09/2014	Nil	No delay
43		RD : 28/09/2015	19/10/2015	28/09/2015	Nil	No delay
44		RD : 19/09/2016	10/10/2016	19/09/2016	Nil	No delay
45		RD : 20/09/2017	11/10/2017	20/09/2017	Nil	No delay
46		RD : 24/09/2018	15/10/2018	24/09/2018	Nil	No delay
47		RD : 20/09/2019	11/10/2019	20/09/2019	Nil	No delay
48		RD : 28/09/2020	19/10/2020	28/09/2020	Nil	No delay
Regulation 7(1) & 7(2) of Old SEBI(SAST) Regulations, 1997						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	7(1) & 7(2)	29/09/2002	25/09/2002 & 26/09/2002	Nil	Acquisition of Shares on 25/09/2002	

Kumkum Dabriwal

Place : Kolkata
Date : 10/03/2021.

Kumkum Dabriwal
Seller & PAC



DHP INDIA LIMITED

Corporate Identity Number (CIN) : L65921WB1991PLC051555



Registered Office : 10 Middleton Row, Kolkata 700 071, India
Tel : +91(33) 2229-5735, 2229-7995, Fax : +91(33) 2217-2751
E-mail : info@dhpindia.com

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Dt. 10/03/2021

Table : D (Page 1 of 3)

TO WHOM IT MAY CONCERN

We hereby declare that all the relevant requirement of Chapter V of the Takeover Regulations, 2011 e.g. regulation Regulation - 29(1), 29(2), 30(1), 30(2), 10(5) & 10(6) of SEBI(SAST) Regulations, 2011 and corresponding provisions of the repealed Takeover Reg., 1997 e.g. regulation No. 6(1), 6(3), 8(1), 8(2), 8A(1), 8A(2), 7(1), 7(2), 7(1A) & 7(2A) of SEBI (SAST) Regulations, 1997, related all of the information received from all promoters, acquirer, seller, and also related person from time to time within the prescribed time limit and complied within time limit. We hereby also confirm that the Company also comply all the relevant requirement of Chapter V of the Takeover Regulations, 2011 e.g. 29(1), 29(2), 30(1), 30(2), 10(5) & 10(6) of SEBI (SAST) Regulations, 2011 - all copies forwarded to the Relevant Stock Exchanges within time, and the corresponding provisions of the repealed Takeover Regulations, 1997 for aforesaid regulations i.e. regulation No. 6(2), 6(4), 7(3), and 8(3) forwarded to the all Stock Exchanges are as below :-

The details of all disclosures complied since 20/02/1997 is as below in TABLE - D [Target Company's Report]

TABLE - D : Compliance of Target Company under these Regulation since inception.						
Sl.No.	Regulation/ Sub- regulation	Due date for compliance as mentioned in the regulation	Actual date of compliance	Delay, if any (in no. of days) Col 4 - col 3	Remarks	
[1]	[2]	[3]	[4]	[5]	[6]	
Regulation 6(2)/6(4) of Old SEBI(SAST) Regulations, 1997 thereafter Regulation 29(1)/29(2) of SEBI (SAST) Regulations, 2011						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	6(2)	20/05/1997	19/04/1997	Nil	No delay	
2	6(4)	20/05/1997	19/04/1997	Nil	No delay	
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
3	29(1)/29(2)	11/03/2021	09/03/2021	Nil	No delay	
Regulation 8(3) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 30(1)/30(2) of SEBI (SAST) Regulations, 2011						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
3	8(3)	for : 31/03/1997	30/04/1997	19/04/1997	Nil	No delay
4		for : 31/03/1998	30/04/1998	28/04/1998	Nil	No delay
5		for : 31/03/1999	30/04/1999	24/04/1999	Nil	No delay
6		for : 31/03/2000	30/04/2000	28/04/2000	Nil	No delay
7		for : 31/03/2001	30/04/2001	27/04/2001	Nil	No delay
8		for : 31/03/2002	30/04/2002	26/04/2002	Nil	No delay
9		for : 31/03/2003	30/04/2003	10/04/2003	Nil	No delay
10		for : 31/03/2004	30/04/2004	05/04/2004	Nil	No delay
11		for : 31/03/2005	30/04/2005	11/04/2005	Nil	No delay
12		for : 31/03/2006	30/04/2006	03/04/2006	Nil	No delay
13		for : 31/03/2007	30/04/2007	02/04/2007	Nil	No delay
14		for : 31/03/2008	30/04/2008	02/04/2008	Nil	No delay
15		for : 31/03/2009	30/04/2009	08/04/2009	Nil	No delay
16		for : 31/03/2010	30/04/2010	08/04/2010	Nil	No delay
17		for : 31/03/2011	30/04/2011	07/04/2011	Nil	No delay

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Table : D (Page 2 of 3)

The details of all disclosures complied since 20/02/1997 is as below in TABLE - D [Target Company's Report]

TABLE - D : Compliance of Target Company under these Regulation since inception.						
Sl.No.	Regulation/ Sub- regulation	Due date for compliance as	Actual date of compliance	Delay, if any (in no. of days)	Remarks	
Regulation 8(3) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 30(1)/30(2) of SEBI (SAST) Regulations, 2011						
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
18	30(1)/30(2)	for : 31/03/2012	30/04/2012	02/04/2012	Nil	No delay
19		for : 31/03/2013	30/04/2013	05/04/2013	Nil	No delay
20		for : 31/03/2014	30/04/2014	04/04/2014	Nil	No delay
21		for : 31/03/2015	30/04/2015	06/04/2015	Nil	No delay
22		for : 31/03/2016	30/04/2016	05/04/2016	Nil	No delay
23		for : 31/03/2017	30/04/2017	05/04/2017	Nil	No delay
24		for : 31/03/2018	30/04/2018	06/04/2018	Nil	No delay
25		for : 31/03/2019	30/04/2019	03/04/2019	Nil	No delay
26		for : 31/03/2020	01/06/2020	19/05/2020	Nil	No delay
Regulation 8(3) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 30(1)/30(2) of SEBI (SAST) Regulations, 2011						
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997						
1	8(3)	RD : 23/07/1997	22/08/1997	18/08/1997	Nil	No delay
2		RD : 05/09/1998	04/10/1998	26/09/1998	Nil	No delay
3		RD : 23/07/1999	22/08/1999	20/08/1999	Nil	No delay
4		RD : 23/08/2000	22/09/2000	20/09/2000	Nil	No delay
5		RD : 23/08/2001	22/09/2001	18/09/2001	Nil	No delay
6		RD : 23/08/2002	22/09/2002	04/09/2002 & 05/09/2002	Nil	No delay
7		RD : 23/08/2003	22/09/2003	02/09/2003 & 03/09/2003	Nil	No delay
8		RD : 23/08/2004	22/09/2004	01/09/2004	Nil	No delay
9		RD : 23/08/2005	22/09/2005	01/09/2005 & 02/09/2005	Nil	No delay
10		RD : 23/08/2006	22/09/2006	02/09/2006	Nil	No delay
11		RD : 23/08/2007	22/09/2007	06/09/2007	Nil	No delay
12		RD : 22/08/2009	12/09/2009	01/09/2009	Nil	No delay
13		RD : 21/08/2010	11/09/2010	31/08/2010	Nil	No delay
14		RD : 27/08/2011	17/09/2011	27/08/2011	Nil	No delay
On New corresponding provisions of the SEBI (SAST) Regulations, 2011						
15	30(1)/30(2)	RD : 01/09/2012	22/09/2012	07/09/2012	Nil	No delay
16		RD : 14/09/2013	05/10/2013	23/09/2013	Nil	No delay
17		RD : 13/09/2014	04/10/2014	15/09/2014	Nil	No delay
18		RD : 28/09/2015	19/10/2015	28/09/2015	Nil	No delay
19		RD : 19/09/2016	10/10/2016	19/09/2016	Nil	No delay
20		RD : 20/09/2017	11/10/2017	20/09/2017	Nil	No delay
21		RD : 24/09/2018	15/10/2018	24/09/2018	Nil	No delay
22		RD : 20/09/2019	11/10/2019	20/09/2019	Nil	No delay
23		RD : 28/09/2020	19/10/2020	28/09/2020	Nil	No delay

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Table : D (Page 3 of 3)

The details of all disclosures complied since 20/02/1997 is as below in TABLE - D [Target Company's Report]

TABLE - D : Compliance of Target Company under these Regulation since inception.					
Sl.No.	Regulation/ Sub-regulation	Due date for compliance as	Actual date of compliance	Delay, if any (in no. of days)	Remarks
Regulations 7(3) of Old SEBI(SAST) Regulations, 1997 thereafter Reg. 10(5)/10(6) of SEBI (SAST) Regulations, 2011					
On Earlier corresponding provisions of the repealed SEBI (SAST) Regulations, 1997					
1	7(3) in response to u/r.7(1)	02-10-2002	25/09/2002	Nil	Acquisition of shares on 25/09/2002
2	7(3) in response to u/r.7(1A)	17/01/2003	16/01/2003	Nil	Acquisition of shares on 15/01/2003
3	7(3) in response to u/r.7(1) & 7(1A)	30/04/2008	29/04/2008	Nil	Acquisition of shares on 28/04/2008
On New corresponding provisions of the SEBI (SAST) Regulations, 2011					
4	Before Acquisition Regulation : 10(5)	01/03/2021	01/03/2021	Nil	Acquisition of Shares on 08/03/2021
5	After Acquisition Regulation : 10(6)	12/03/2021	09/03/2021	Nil	Acquisition of Shares on 08/03/2021

Notes : RD means Record Date for the purpose of dividend.

Place : Kolkata

Date : 10/03/2021



For DHP INDIA LIMITED

[CA Ashok Kumar Singh]

Chief Financial Officer

ASHEESH DABRIWAL

2A/3A, Sapphire
13/2, Ballygunge Park Road
Kolkata – 700 019

Phone No : (033) 2229-5735/7995/9626/7929

Email : asheesh@dhpindia.com

Dated : 10-03-2021

**DECLARATION BY ACQUIRER FOR EXEMPTION UNDER REGULATION 10(1)(a) of SEBI (SAST)
REGULATIONS, 2011**

I hereby declare that all of the conditions specified under Regulation 10(1)(a) of Securities Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 with respect to exemptions has been duly complied with. The 11,45,100 Equity Shares of DHP India Limited (38.17% of the Total Shares of DHP India Limited) acquired from my Father & Mother (Immediate Relative as per Takeover Regulations) by way of Gift on off-market transactions on 08-03-2021. Similarly I hereby declare that from I am a Promoter & Managing Director of DHP India Limited and My father – Sri Nirmal Kumar Dabriwala & Mother – Smt. Kumkum Dabriwal, both names covered under “Promoters Group” of all filing of Shareholding Pattern with Stock Exchanges. There are No changes in Shareholding Position of Acquirer as well as Seller(s) under all under “Promoters Group” from last previous Three Years.

I also declare that I have fulfilled the all conditions of specified under said regulations and wants to claim of exemption of “Public Announcement” of my aforesaid acquisition of 11,45,100 Equity Shares of DHP India Limited of “inter-se-transfer” amongst promoters under Regulation 10(1)(a)(i) & 10(1)(a)(ii) of SEBI (SAST) Regulations, 2011.


[ASHEESH DABRIWAL]

Acquirer, Promoter & Managing Director [KMP] of DHP India Limited.