

Date: 9<sup>th</sup> November, 2021

To,  
**National Stock Exchange of India Limited**  
Exchange Plaza,  
Plot No. C/1, G Block,  
Bandra Kurla Complex,  
Bandra (East), Mumbai - 400 051  
**NSE Scrip Code: FLUOROCHEM**

To,  
**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001  
**BSE Scrip Code: 542812**

Dear Sirs,

**Sub: Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ('Takeover Regulations')**

**Target Company: Gujarat Fluorochemicals Limited**

I, Mr. Vivek Kumar Jain, am a partner, having Profit Sharing Ratio (PSR) of 0.05% in Siddhapavan Trading LLP. Siddhapavan Trading LLP is a part of the promoter group of Gujarat Fluorochemicals Limited, holding 5.08% equity shares of Gujarat Fluorochemicals Limited. Mr. Pavan Kumar Jain having 99.89% PSR in Siddhapavan Trading LLP, have retired and consequently, my PSR and control has increased to 99.94% in Siddhapavan Trading LLP which holds 5.08% equity shares in Gujarat Fluorochemicals Limited, which amounts to indirect acquisition of equity shares of Gujarat Fluorochemicals Limited under Regulation 3 read with Regulation 5 of the Takeover Regulations. The indirect acquisition of shares in Gujarat Fluorochemicals Limited was pursuant to inter-se transfer of shares amongst qualifying persons as specified in Regulation 10(1)(a)(i) of Takeover Regulations.

We enclose herewith the disclosure as prescribed under Regulation 29(1) of the Takeover Regulations showing aggregated shareholding and voting rights of the acquirer or promoter in the target company post effecting the changes on account of the inter se transfer of shares within the promoter group.

We request you to kindly take the same on record.

Thanking you,

Yours faithfully,

**Mr. Vivek Kumar Jain**  
**(Acquirer)**

**Cc: Company Secretary**  
**Gujarat Fluorochemicals Limited**  
**Survey No. 16/3, 26 & 27,**  
**Taluka Ghoghamba,**  
**Village, Ranjitnagar,**  
**Panch Mahal- 389380**  
**Gujarat, India.**

**Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

|                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                    |                                                            |                                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|------------------------------------------------------------|
| 1. Name of the Target Company (TC)                                                                                                                                        | Gujarat Fluorochemicals Limited                                                                                                                                                                                                                                                                    |                                                            |                                                            |
| 2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer                                                                                          | <p><b><u>Acquirer:</u></b><br/>Mr. Vivek Kumar Jain</p> <p><b><u>PAC:</u></b><br/>Devansh Trademart LLP<br/>Siddhapavan Trading LLP<br/>Devendra Kumar Jain<br/>Inox Leasing and Finance Limited<br/>Devansh Jain<br/>Hem Kumari<br/>Kapoor Chand Jain<br/>Nandita Jain<br/>Inox Chemicals LLP</p> |                                                            |                                                            |
| 3. Whether the acquirer belongs to Promoter/Promoter group                                                                                                                | Yes, the Acquirer forms part of the Promoter/<br>Promoter Group/ PAC                                                                                                                                                                                                                               |                                                            |                                                            |
| 4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed                                                                                                     | BSE Limited<br>National Stock Exchange of India Limited                                                                                                                                                                                                                                            |                                                            |                                                            |
| 5. Details of the acquisition / disposal as follows                                                                                                                       | Number                                                                                                                                                                                                                                                                                             | % w.r.t .total share/voting capital wherever applicable(*) | % w.r.t. total diluted share/voting capital of the TC (**) |
| 6. <b>Before the acquisition under consideration, holding of acquirer along with PACs of (Please see <u>Table 1</u>):</b>                                                 |                                                                                                                                                                                                                                                                                                    |                                                            |                                                            |
| a) Shares carrying voting rights                                                                                                                                          | 7,43,17,768                                                                                                                                                                                                                                                                                        | 67.66%                                                     | 67.66%                                                     |
| b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)                                                                                   | Nil                                                                                                                                                                                                                                                                                                | Nil                                                        | Nil                                                        |
| c) Voting rights (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 T C (specify holding in each category) | Nil                                                                                                                                                                                                                                                                                                | Nil                                                        | Nil                                                        |
| <b>e) Total (a+b+c+d)</b>                                                                                                                                                 | <b>7,43,17,768</b>                                                                                                                                                                                                                                                                                 | <b>67.66%</b>                                              | <b>67.66%</b>                                              |
| 7. <b>Details of acquisition/sale</b>                                                                                                                                     |                                                                                                                                                                                                                                                                                                    |                                                            |                                                            |
| a) Shares carrying voting rights acquired/sold (Please see <u>Table 1</u> )                                                                                               | Nil                                                                                                                                                                                                                                                                                                | N.A.                                                       | N.A.                                                       |

|                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                              |               |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------|
| b) VRs acquired /sold otherwise than by shares                                                                                                                                             | Nil                                                                                                                                                                                                                                                                                                                                          | N.A.          | N.A.          |
| c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold     | Nil                                                                                                                                                                                                                                                                                                                                          | N.A.          | N.A.          |
| d) Shares encumbered / invoked/released by the acquirer                                                                                                                                    | Nil                                                                                                                                                                                                                                                                                                                                          | N.A.          | N.A.          |
| <b>e) Total (a+b+c+/-d)</b>                                                                                                                                                                | <b>Nil</b>                                                                                                                                                                                                                                                                                                                                   | <b>N.A.</b>   | <b>N.A.</b>   |
| <b>8. After the acquisition/sale, holding of acquirer along with PACs of (Please see <u>Table 1</u>):</b>                                                                                  |                                                                                                                                                                                                                                                                                                                                              |               |               |
| a) Shares carrying voting rights                                                                                                                                                           | 7,43,17,768                                                                                                                                                                                                                                                                                                                                  | 67.66%        | 67.66%        |
| b) Shares encumbered with the acquirer                                                                                                                                                     | Nil                                                                                                                                                                                                                                                                                                                                          | Nil           | Nil           |
| c) VRs 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) after acquisition | Nil                                                                                                                                                                                                                                                                                                                                          | Nil           | Nil           |
| <b>e) Total (a+b+c+d)</b>                                                                                                                                                                  | <b>7,43,17,768</b>                                                                                                                                                                                                                                                                                                                           | <b>67.66%</b> | <b>67.66%</b> |
| 9. Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).                                              | The Acquirer has not directly acquired equity shares of the TC but has increased his PSR and partnership interest by 99.89%, on retirement of Mr. Pavan Kumar Jain. Siddhapavan Trading LLP holds 5.08% stake in TC as part of the promoter group. Please refer Annexure A for interest in Siddhapavan Trading LLP acquired by the Acquirer. |               |               |
| 10. Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc                                                 | Equity shares                                                                                                                                                                                                                                                                                                                                |               |               |
| 11. Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable                                                             | 8 <sup>th</sup> November 2021                                                                                                                                                                                                                                                                                                                |               |               |
| 12. Equity share capital / total voting capital of the TC before the said acquisition / sale                                                                                               | INR 10,98,50,000/- divided into 10,98,50,000 Equity Shares of INR 1/- each fully paid up.                                                                                                                                                                                                                                                    |               |               |
| 13. Equity share capital/ total voting capital of the TC after the said acquisition / sale                                                                                                 | INR 10,98,50,000/- divided into 10,98,50,000 Equity Shares of INR 1/- each fully paid up.                                                                                                                                                                                                                                                    |               |               |
| 14. Total diluted share/voting capital of the TC after the said acquisition                                                                                                                | INR 10,98,50,000/- divided into 10,98,50,000 Equity Shares of INR 1/- each fully paid up.                                                                                                                                                                                                                                                    |               |               |

(\*) 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.

(\*\*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

**Mr. Vivek Kumar Jain**  
**(Acquirer)**

**Date: 9<sup>th</sup> November, 2021**

**Place: Delhi**

TABLE 1

Shareholding of acquirer(s), PACs and seller individually in TC (in terms of no. & as a percentage of the total share/voting capital of the TC) before and after the acquisition:

| Sr.No | Name of the Shareholders                           | Shares held before the acquisition |                                                   | Shares held after the acquisition |                                                   |
|-------|----------------------------------------------------|------------------------------------|---------------------------------------------------|-----------------------------------|---------------------------------------------------|
|       |                                                    | No. of equity shares               | % w.r.t total share capital / voting rights of TC | No. of equity shares              | % w.r.t total share capital / voting rights of TC |
|       | <b>Acquirer(s) and PACs (other than Seller(s))</b> |                                    |                                                   |                                   |                                                   |
| a.    | <b>Acquirer (s)</b>                                |                                    |                                                   |                                   |                                                   |
|       | Vivek Kumar Jain                                   | 20,100                             | 0.02%                                             | 20,100                            | 0.02%                                             |
|       | <b>Sub Total</b>                                   | <b>20,100</b>                      | <b>0.02%</b>                                      | <b>20,100</b>                     | <b>0.02%</b>                                      |
|       |                                                    |                                    |                                                   |                                   |                                                   |
| b.    | <b>PACs [other than Seller (s)]</b>                |                                    |                                                   |                                   |                                                   |
|       | Devansh Trademart LLP                              | 6,662,360                          | 6.06%                                             | 6,662,360                         | 6.06%                                             |
|       | Siddhapavan Trading LLP                            | 5,576,440                          | 5.08%                                             | 5,576,440                         | 5.08%                                             |
|       | Devendra Kumar Jain                                | 20,100                             | 0.02%                                             | 20,100                            | 0.02%                                             |
|       | Inox Leasing and Finance Limited                   | 6,05,91,906                        | 55.16%                                            | 6,05,91,906                       | 55.16%                                            |
|       | Devansh Jain                                       | 10,000                             | 0.01%                                             | 10,000                            | 0.01%                                             |
|       | Inox Chemicals LLP                                 | 14,06,862                          | 1.28%                                             | 14,06,862                         | 1.28%                                             |
|       | Hem Kumari                                         | 10,000                             | 0.01%                                             | 10,000                            | 0.01%                                             |
|       | Kapoor Chand Jain                                  | 10,000                             | 0.01%                                             | 10,000                            | 0.01%                                             |
|       | Nandita Jain                                       | 10,000                             | 0.01%                                             | 10,000                            | 0.01%                                             |
|       | <b>Sub Total</b>                                   | <b>7,42,97,668</b>                 | <b>67.64%</b>                                     | <b>7,42,97,668</b>                | <b>67.64%</b>                                     |
|       |                                                    |                                    |                                                   |                                   |                                                   |
| c.    | <b>Seller(s)</b>                                   |                                    |                                                   |                                   |                                                   |
|       | Pavan Kumar Jain                                   | -                                  | -                                                 | -                                 | -                                                 |
|       | <b>Sub Total</b>                                   | -                                  | -                                                 | -                                 | -                                                 |
|       | <b>Total</b>                                       | <b>7,43,17,768</b>                 | <b>67.66%</b>                                     | <b>7,43,17,768</b>                | <b>67.66%</b>                                     |

## Annexure A

### Indirect transfer of equity shares of Gujarat Fluorochemicals Limited amongst immediate relatives (qualifying persons)

| Name of the LLP whose interest is transferred     | No. of equity shares held in Target Company | % equity holding in the Target Company |
|---------------------------------------------------|---------------------------------------------|----------------------------------------|
| Siddhapavan Trading LLP (Details given in Note 1) | 55,76,440                                   | 5.08%                                  |
| <b>Total</b>                                      | <b>55,76,440</b>                            | <b>5.08%</b>                           |

#### Note 1

#### Increase in PSR and partnership interest of the Acquirer in Siddhapavan Trading LLP

| Particulars              | %PSR          |
|--------------------------|---------------|
| <b>Transferor's Name</b> |               |
| Mr. Pavan Kumar Jain     | 99.89%        |
| <b>Total</b>             | <b>99.89%</b> |
| <b>Acquirer's Name</b>   |               |
| Mr. Vivek Kumar Jain     | 99.89%        |
| <b>Total</b>             | <b>99.89%</b> |