

COUNTER CYCLICAL INVESTMENTS PRIVATE LIMITED

Regd off: FN 401 PN 16 Shirkey Building L/O Rajnagar SB Colony

Nagpur MH 440013

CIN: U65999PN2018PTC175591 E-mail: keshav.equity@gmail.com

To,
COCHIN MINERALS AND RUTILE LTD
VIII/224 P B No 73 market Road
Alwaye, Ernakulam,
Kerala, India, 683101
E-mail - cmrlexim@cmrlindia.com

To,
BSE LIMITED
Corporate Relationship Department
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai- 400001
E-mail- Corp.relations@bseindia.com

**SUBJECT: - DISCLOSURES UNDER REGULATION 29(2) OF SECURITIES
AND EXCHANGE BOARD OF INDIA (SUBSTANTIAL ACQUISITION OF
SHARES & TAKEOVERS) REGULATIONS, 2011**

Dear Sir,

This is to inform you that -

1. We, Counter Cyclical Investments Private Limited (Portfolio Manager - Acquirer) along with the Clients of Portfolio Manager (persons acting in concert) was holding a total of 429953 shares in Cochin Minerals and Rutile Ltd (Target Company) as at 21st November, 2025.
2. As per the requirement stated under Regulation 29(2) of the SEBI SAST Regulations, we enclose with this letter, a disclosure of the change in our shareholding in the Target Company, pursuant to the acquisition. The enclosed disclosure is in the relevant format notified by SEBI in respect of Regulation 29(2) of the SEBI SAST Regulations.

This letter is intended for the information and records of the Target Company and the Stock Exchanges.

Thanking You,

Yours sincerely,

For and on behalf of Acquirer

(Counter Cyclical Investments Private Limited)



Parminder Pal Singh Bhatia
Director
(DIN: 07159378)



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Disclosures under Regulation 29 (2) of SEBI (Substantial Acquisition of shares and Takeovers) Regulations, 2011**Part-A-Details of the Acquisition**

Name of the Target Company (TC)	Cochin Minerals and Rutile Ltd		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Counter Cyclical Investment Private Limited (PMS) through its clients		
Whether the acquirer belongs to Promoter/Promoter group	NO		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited (BSE)		
Details of the Acquisition as follows	Number	%w.r.t. total 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	429953	5.49%	5.49%
b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)			
c) Voting rights (VR) otherwise than by shares			
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)	429953	5.49%	5.49%
e) Total (a+b+c+d)			

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Details of Acquisition			
a) Shares carrying voting rights acquired	8728	0.11%	0.11%
b) VR's acquired/sold otherwise than by shares			
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold			
d) Shares encumbered/invoked/released by the acquirer			
e) Total (a+b+c+d)	8728	0.11%	0.11%
After the Acquisition, holding of:			
a) Shares carrying voting rights acquired	438681	5.60%	5.60%
b) Shares encumbered with the acquirer			
c) VR's otherwise than by shares			
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			
e) Total (a+b+c+d)	438681	5.60%	5.60%
Mode of acquisition (e.g. opens market / off market/ public issue / rights issue / preferential allotment / inter-se transfer, etc.)	OPEN MARKET		
Date of acquisition of shares/VR or date of receipt of intimation of allotment of shares, whichever is applicable	21.11.2025		
Equity share capital / total voting capital of the TC before the said acquisition	7830000 Shares		

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Equity share capital/ total voting capital of the TC after the said acquisition	7830000 Shares
Total diluted share/voting capital of the TC after the said acquisition	7830000 Shares

(*) 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.

For and on behalf of

Counter Cyclical Investments Private Limited



Authorised Signatory



Name: -Mr. Parminderpal Singh Bhatia

Designation: - Director

Date: 22.11.2025