

THE GEM INVESTMENT & TRADING COMPANY PRIVATE LIMITED

REGISTERED OFFICE :

2, MINTO PARK, KOLKATA - 700 027

Phone : 22239857

CIN : U51909WB1947PTC016228 E-mail: geminvestment.pvtltd@gmail.com

September 25, 2017

The Department of Corporate Services
BSE Limited
1st Floor, New Trading Ring
Rotunda Building, P.J. Towers
Dalal Street, Fort
Mumbai 400 001

(corp.relations@bseindia.com)

The Secretary
National Stock Exchange of India Limited
Compliance Department
Exchange Plaza, Bandra Kurla Complex
Bandra (E)
Mumbai 400 051

(takeover@nse.co.in)

Dear Sirs:

Sub: Disclosure under Regulations 29(2) and 29(1) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

We enclose our disclosure under Regulations 29(2) and 29(1) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 relating to transactions in securities of United Breweries (Holdings) Limited on 07.09.2012. We submit that the failure to make the disclosure at the relevant point of time was inadvertent and unintentional and on the bona fide reliance on the advice that no disclosure was required in view of the nature of the transactions. However, the disclosures are now made as advised by the SEBI in connection with our submissions in response to an enquiry by SEBI in the matter.

Thanking you

Yours faithfully
For **The Gem Investment & Trading
Company Private Limited**


T.R. Ghosh
Director

Encl : as above

Cc : United Breweries (Holdings) Limited (in Liquidation), UB Tower, Level 12, UB City,
24 Vittal Mallya Road, Bangalore 560 001.

Format for Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	United Breweries (Holdings) Limited		
Name(s) of the transferor and Persons Acting in Concert (PAC) with the transferor	The Gem Investment & Trading Company Private Limited PAC 1. Mallya Private Ltd 2. Kamsco Industries Private Ltd 3. Pharma Trading Company Private Ltd 4. Devi Investments Private Ltd 5. Vittal Investments Private Ltd 6. McDowell Holdings Ltd 7. Watson Ltd 8. FirStart Inc. 9. Dr. Vijay Mallya and his relatives		
Whether the transferor belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE and NSE		
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 (**)

Before the disposal under consideration, holding of:			
a) Shares carrying voting rights	1,066,184	1.60	N.A.
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	--	--	N.A.
c) Voting rights (VR) otherwise than by shares	--	--	N.A.
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)	--	--	--
e) Total (a+b+c+d)	1,066,184	1.60	N.A.
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold	820,000	1.23	N.A.
b) VRs acquired /sold otherwise than by shares	--	--	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	--	--	N.A.
d) Shares encumbered/invoked/released by the acquirer	--	--	N.A.
e) Total (a+b+c+/-d)	820,000	1.23	N.A.
After the acquisition/sale, holding of:			
a) Shares carrying voting rights	246,184	0.37	N.A.
b) Shares encumbered with the acquirer	--	--	N.A.
c) VRs otherwise than by shares	--	--	N.A.
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	--	--	N.A.
e) Total (a+b+c+d)	246,184	0.37	N.A.

Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Transfer from transferor to lender through an off-market transaction. Note: Shares were to be provided by the transferor as security for a loan. However, they were erroneously transferred to the lender as an off-market transaction and such transfer is being disclosed herein.
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	07.09.2012
Equity share capital / total voting capital of the TC before the said acquisition / sale	66,818,521 equity shares of Rs.10 each
Equity share capital/ total voting capital of the TC after the said acquisition / sale	66,818,521 equity shares of Rs.10 each
Total diluted share/voting capital of the TC after the said acquisition	66,818,521 equity shares of Rs.10 each


(*) 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.

Place : Kolkata

Date : September 25, 2017

**For The Gem Investment & Trading
Company Private Limited**


**T.R. Ghosh
Director**