

SIL Investments Limited

CIN No.-L17301RJ1934PLC002761

Registered Office : Pachpahar Road, Bhawani Mandi - 326502 (Rajasthan)

Tel.: (07433) 222082; Fax : (07433) 222916; Mob.: 09769484106; E-mail : lokeshgandhi@silinvestments.in; sil-accounts@silinvestments.in; investor.grievances@silinvestments.in; Website : www.silinvestments.in

SIL/

November 16, 2016

1. Department of Corporate Services
Bombay Stock Exchange Ltd.
P J Towers,
Dalal Street, Mumbai - 400001, India
Fax: 022-22723121/22723719

2. The Listing Department
National Stock Exchange of India Ltd.
Exchange Plaza, 5th floor
Plot No.C/1, G-Block
Bandra-Kurla Complex
Bandra (E), Mumbai 400 051
Fax: 022-26598237/38

Re: **Disclosure under Regulation 31(1) and 31(2) of SEBI (SAST) Regulations, 2011**

Dear Sirs,

Please find enclosed herewith disclosure under Regulation 31(1) and 31(2) of SEBI (SAST) Regulations, 2011 in the prescribed format.

This is in compliance of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations 2011.

We hope you will find the same in order.

Thanking you,

Yours faithfully,
For SIL Investments Limited



(Lokesh Gandhi)
Company Secretary and Compliance Officer



Encl:a/a.

cc to Zuari Agro Chemicals Ltd. – Attn: Mr.R.Y.Patil
Jaikisan Bhawan
Zuari Nagar
Goa-403 726

Format for disclosure by the Promoter(s) to the stock exchanges and to the Target Company for encumbrance of shares / invocation of encumbrance/ release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)
 Names of the Stock Exchange where the shares of the target company are listed
 Date of reporting
 Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked

Zuari Agro Chemicals Limited
 Bombay Stock Exchange Limited
 National Stock Exchange of India Limited
 16.11.2016
 SIL Investments Limited

Details of the creation of encumbrance :

| Name of the Promoter(s) or PACs with him(*) | Promoter holding in the Target Company (1) | | Promoter holding already encumbered (2) | | Details of events pertaining to encumbrance (3) | | | | | | | | | | Post event holding of encumbered shares {creation[(2)+(3)]/ release[(2)-(3)]/ invocation[(2)-(3)]} | |
|---|--|--------------------------|---|--------------------------|---|--|--|---|--------|--------------------|---|-----------|--------------------------|--|--|--|
| | Number | % of total share capital | Number | % of total share capital | Type of event (creation/ release/ invocation) | Date of creation/ invocation/ release of encumbrance | Type of encumbrance (pledge/ lien/ non disposal undertaking/ others) | Reasons for encumbrance ** | Number | % of share capital | Name of the entity in whose favor shares encumbered *** | Number | % of total share capital | | | |
| SIL Investments Limited | 32,08,000 | 7.63 | 12,65,000 | 3.00 | Creation | 11.11.2016 | Pledge | Creation of Pledge favouring M/s Aditya Birla Finance Limited as security towards borrowing | 600000 | 1.43 | M/s. Aditya Birla Finance Limited | 18,65,000 | 4.43 | | | |
| Globalware Trading & Holdings Ltd. | 70,12,000 | 16.67 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | | | |
| Texmaco Infrastructure & Holdings Ltd. | 30,00,125 | 7.13 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | | | |
| Coltrane Corpn. Ltd. | 4,79,750 | 1.14 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | | | |



| | | | | | | | | | | | | | | | | | |
|-------------------------------------|-----------|------|---|---|---|------|------|------|------|------|------|------|------|------|------|------|------|
| Jeewan Jyoti Medical Society | 1,38,550 | 0.33 | 0 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Adventz Finance Private Limited | 14,24,201 | 3.39 | 0 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Duke Commerce Ltd. | 1,11,000 | 0.26 | 0 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Saroj Kumar Poddar | 1,29,406 | 0.31 | 0 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Adventz Securities Enterprises Ltd. | 98,804 | 0.24 | 0 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Adventz Investment Co. Pvt. Ltd. | 15,000 | 0.04 | 0 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Ricon Commerce Ltd. | 8,100 | 0.02 | 0 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Jyotsna Poddar | 71,621 | 0.17 | 0 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| New Eros Tradecom Ltd. | 11,96,767 | 2.85 | 0 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Pilani Investment & Ind. Corp. Ltd. | 4,34,000 | 1.03 | 0 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |



| | | | | | | | | | | | | | | | | | |
|-----------------------------------|-----------|-------|---|---|------|------|------|------|------|------|------|------|------|------|------|------|------|
| RTM Investment & Trading Co. Ltd. | 1,10,768 | 0.26 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| SCM Investment & Trading Co. Ltd. | 35,000 | 0.08 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Ronson Traders Ltd. | 63,200 | 0.15 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Basant Kumar Birla | 30,000 | 0.07 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Zuari Global Limited | 84,11,601 | 20.00 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |
| Zuari Management Services Ltd. | 50,78,909 | 12.08 | 0 | 0 | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |

Signature of the Authorized Signatory **For and on behalf of**
SIL INVESTMENTS LIMITED



[Signature]

COMPANY SECRETARY

Place: Mumbai
Date: 16.11.2016
Note:

*The names of all the promoters, their shareholding in the target company and their pledged shareholding as on the reporting date should appear in the table irrespective of whether they are reporting on the date of event or not.
** For example, for the purpose of collateral for loans taken by the company, personal borrowing, third party pledge, etc.
*** This would include name of both the lender and the trustee who may hold shares directly or on behalf of the lender.
Note: Disclosure under Regulation 7 (2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 is separately submitted to the Zuari Agro Chemicals Limited