

CONSTRUCTIVE FINANCE PVT. LTD.

Adm. Office : SF-202, Peach Tree, C-Block, Sushant Lok-1, Gurgaon - 122002

Ph.: 0124 - 4262305 / 07 / 08 ♦ Fax. 0124 - 4262306

CIN : U67120DL1988PTC250410

To,

Date: 24.03.2017

The Manager Securities And Exchange Board Of India Plot No. C 4-A , G Block, Near Bank of India, Bandra Kurla Complex, Bandra East, Mumbai, Maharashtra 400051 Phone:022 2644 9000	National Stock Exchange of India Limited Exchange Plaza, 5 th Floor, Plot No C/1, G Block Bandra Kurla Complex Bandra East Mumbai – 400051
Dept of Corporate Services Bombay Stock Exchange Limited P.J Towers, Dalal Street Mumbai – 400001	

Dear Sir,

Sub: Inter-se transfer of shares amongst Promoter Group

Ref: Report under Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

This is to inform you that Sunrays Properties and Investment Co. Pvt Ltd, being a part of the Promoter Group of PTL Enterprises Limited, transferred 1,31,95,324 equity shares of Rs.2/- each of PTL Enterprises Limited, by way of gift to Constructive Finance Pvt. Ltd which is also a part of the Promoter Group of PTL Enterprises Limited.

This being an inter se transfer of shares amongst the Promoter Group, the same falls within the exemption under Regulation 10(1)(a)(ii) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. Consequent to the above acquisition, the shareholding of Constructive Finance Pvt. Ltd in PTL Enterprises Limited will increase from 3,30,17,575 equity shares to 4,62,12,899 equity shares.

The aggregate holding of Promoters Group before and after the above inter se transaction remains the same.

In this connection the report under Regulation 10(7) along with the Demand Draft bearing No 047719 dated 21.03.2017 for the sum of Rs. 1,50,000/- (Indian Rupees One Lakh Fifty Thousand only) in favour of the Securities and Exchange Board of India, payable at Mumbai, drawn on

27/3/2017
2017
138408

Punjab National Bank, for the above said acquisition in the prescribed format is enclosed herewith for your kind information and records.

Thank you

Yours faithfully

For and behalf of Constructive Finance Pvt. Ltd

Encl: a/a



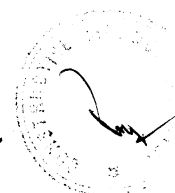
PA 1011-1012 1
1011-1012
1011-1012
1011-1012 (A+B)
1011-1012
1011-1012 1012

Format under Regulation 10(7) – Report to SEBI in respect of any acquisition made in reliance up on exemption provided for in regulation 10(1)(a)(ii) of SEBI (Substantial Acquisition Of Shares And Takeover) Regulations, 2011

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.} Name: Constructive Finance Pvt Ltd. CIN: U67120DL1988PTC250410 Address: 414/1, 4TH Floor, DDA Commercial Complex, District Centre, Janakpuri New Delhi -110058 IN Tel: 9811469005
	b.	Whether sender is the acquirer (Y/N) Yes
	c.	If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization) Not Applicable
	d.	Name, address, Tel no: and e-mail of Sender, if sender is not the acquirer Not Applicable
2	Compliance of Regulation 10(7)	
	a.	Date of report 24.03.2017
	b.	Whether report has been submitted to SEBI within 21 working days from the date of the acquisition Yes
	c.	Whether the report is accompanied with fees as required under Regulation 10(7) Yes. Please find enclosed a Demand Draft bearing No 047719 dated 21.03.2017 for the sum of Rs. 1,50,000/- (Indian Rupees One Lakh Fifty Thousand only) in favour of the Securities and Exchange Board of India, payable at Mumbai, drawn on Punjab National Bank.
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
	b	Date of Report March 10, 2017
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 Yes

		of the acquisition													
	b.	Date of Report	March 21, 2017												
5	Details of the Target Company														
	a.	Name & address of TC	PTL Enterprises Ltd. 3rd floor, Areekal Mansion, Near Manorama Junction, Panampilly Nagar, Kochi Ernakulam KL 682036 IN												
	b.	Name of the Stock Exchange(s) where the shares of the TC are listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited												
6.	Details of the acquisition														
	a.	Date of acquisition	20.03.2017												
	b.	Acquisition price per share (in Rs.)	Nil. The said transfer was by way of Gift, hence no consideration was paid												
	c.	Regulation which would have been triggered an offer, had the report not been filed under Regulation 10(7). (whether Regulation 3(1), 3(2),4 or 5)	Regulation 3(2)												
	d.	Shareholding of acquirer(s) and PAC Individually in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)	<table> <tr> <th colspan="2">Before the acquisition</th><th colspan="2">After the acquisition</th></tr> <tr> <th>No: of Shares</th><th>% w.r.t total share capital of TC</th><th>No: of Shares</th><th>% w.r.t total share capital of TC</th></tr> <tr> <td>3,30,17,575</td><td>49.88</td><td>4,62,12,899</td><td>69.82</td></tr> </table>	Before the acquisition		After the acquisition		No: of Shares	% w.r.t total share capital of TC	No: of Shares	% w.r.t total share capital of TC	3,30,17,575	49.88	4,62,12,899	69.82
Before the acquisition		After the acquisition													
No: of Shares	% w.r.t total share capital of TC	No: of Shares	% w.r.t total share capital of TC												
3,30,17,575	49.88	4,62,12,899	69.82												
		Name(s) of the acquirer(s)													
	e.	Shareholding of seller/s in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)	<table> <tr> <th colspan="2">Before the acquisition</th><th colspan="2">After the acquisition</th></tr> <tr> <th>No: of Shares</th><th>% w.r.t total share capital of TC</th><th>No: of Shares</th><th>% w.r.t total share capital of TC</th></tr> <tr> <td>1,31,95,324</td><td>19.94</td><td>Nil</td><td>-</td></tr> </table>	Before the acquisition		After the acquisition		No: of Shares	% w.r.t total share capital of TC	No: of Shares	% w.r.t total share capital of TC	1,31,95,324	19.94	Nil	-
Before the acquisition		After the acquisition													
No: of Shares	% w.r.t total share capital of TC	No: of Shares	% w.r.t total share capital of TC												
1,31,95,324	19.94	Nil	-												
		Name(s) of the seller(s)													
7.	Information specific to the exemption category to which the instant acquisition belongs -Regulation 10(1)(a)(ii)														

a.	Provide the names of the seller(s)	Sunrays Properties and Investment Co. Pvt Ltd		
b.	Specify the relationship between the acquirer(s) and the seller(s).	Both Sunrays Properties and Investment Co. Pvt Ltd and Constructive Finance Pvt. Ltd are part of the Promoter Group of PTL Enterprises Limited		
c.	Shareholding of the acquirer and the seller/s in the TC during the three years prior to the proposed acquisition	Year -1	Year-2	Year-3
	Acquirer(s)	33017575	33017575	33017575
	Sellers(s)	13195324	13195324	13195324
d.	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 agreement or the Takeover Regulations.	Yes, Sunrays Properties and Investment Co. Pvt Ltd and Constructive Finance Pvt. Ltd have been named as promoters in the shareholding pattern filed by PTL Enterprises Limited. Copies of the Shareholding pattern filed by PTL Enterprises Limited (TC) are enclosed as Annexure-1		
e.	If shares of the TC are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed	Rs.142. However, the shares are being transferred by way of gift. Hence no consideration was paid.		
f.	If shares of the TC are infrequently traded, the price of such shares as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not applicable since the shares are being transfer without any consideration i.e by way of gift.		
g.	Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (e) or (f) above as applicable	Not Applicable as the said transfer of shares was by way of a gift and hence no consideration was paid.		
h.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed	10.03.2017		
i.	(1) Whether the acquirers as well as sellers	Yes. The acquirer and seller/donor have		



		have complied with the provisions (during the 3 years prior to acquisition) of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). (2) If yes, specify applicable regulation/s as well as date on which the requisite disclosures were made and furnish the copies of the same.	complied with the provision of chapter V of the takeover Regulations. Copies of the declaration are attached herewith as Annexure- 2
	j.	Declaration by the acquirer that all the conditions specified under regulation 10(1) (a)(ii) with respect to exemptions has been duly complied with.	We hereby declare that all the conditions specified under regulation 10(1) (a)(ii) with respect to exemptions has been duly complied with.

I/We hereby declare that the information provided in the instant report is true and nothing has been concealed therefrom.

Signature:

Date: 24/3/17

Place: Gurugram

Rajesh Kumar
RAJESH KUMAR
DIRECTOR
RAJESH KUMAR
DIRECTOR
RAJESH KUMAR
DIRECTOR

[Signature]

PTL ENTERPRISES LIMITED

Website: www.ptlenterprise.com

E.mail: investors@ptlenterprises.com

CIN - L25111KL1959PLC009300

Dated: 13.01.2017

Dept of Corporate Services Bombay Stock Exchange Limited P.J Towers, Dalal Street Mumbai - 400001	National Stock Exchange of India Limited Exchange Plaza, 5 th Floor, Plot No C/1, G Block Bandra Kurla Complex Bandra East Mumbai - 400051
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Sub: Compliance under regulation 31 of the SEBI (Listing and Obligations and Disclosures Requirements) Regulations 2015.

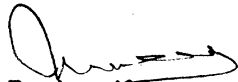
Dear Sirs,

Please find enclosed herewith as an attachment the Quarterly Shareholding Pattern for the Quarter ended December 31, 2016

Hope you will find the above in order.

Yours Faithfully

For PTL ENTERPRISES LIMITED



Pradeep Kumar
Company Secretary (F4971)
B-39, Vikalp Appts. Plot No. 92,
I.P. Extn., Delhi-110092



Corporate Office : C/o Apollo Tyres Limited, Apollo House, 7, Institutional Area, Sector -32, Gurgaon -122001 (Haryana)
Tel.: (0124) - 2383002, 2383003, Fax : (0124) - 2383021, 2383017

Registered Office : 3rd Floor, Areekal Mansion, Near Manorama Junction, Panampilly Nagar, Kochi -682036
Tel.: (0484) - 4012046, 4012047, (Fax) : (0484) - 4012048

Annexure-2

CONSTRUCTIVE FINANCE PVT. LTD.

Adm. Office : SF-202, Peach Tree, C-Block, Sushant Lok-1, Gurgaon - 122002

Ph.: 0124 - 4262305 / 07 / 08 ♦ Fax. 0124 - 4262306

CIN : U67120DL1988PTC250410

To,

Date: 21.03.2017

Dept of Corporate Services Bombay Stock Exchange Limited P.J Towers, Dalal Street Mumbai - 400001	National Stock Exchange of India Limited Exchange Plaza, 5 th Floor, Plot No C/1, G Block Bandra Kurla Complex Bandra East Mumbai - 400051
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Dear Sir,

Sub: Inter-se transfer of shares amongst Promoter Group

Ref: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

In terms of Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Takeover Regulations) we, Constructive Finance Pvt. Ltd. forward herewith the disclosure with regard to receipt of by way of gift of 1,31,95,324 equity shares of Rs.2/- each of PTL Enterprises Limited received by us from Sunrays Properties and Investment Co. Pvt Ltd.

Both Constructive Finance Pvt. Ltd. (acquirer) and Sunrays Properties and Investment Co. Pvt Ltd. (transferee) belong to the promoter group of PTL Enterprises Limited. Hence, the aggregate holding of Promoters Group before and after the above inter se transaction remains the same.

This is for your kind information and records

Thank you

Yours faithfully

For and behalf of Constructive Finance Pvt. Ltd


RAJAN SABHARWAL
Director
(02372919)
13-CM-Type, Shalimar (Appts).
Shalimar Garden,
Main Dist Ghd-201005

24/03/07

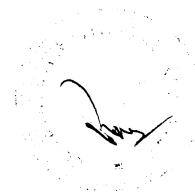
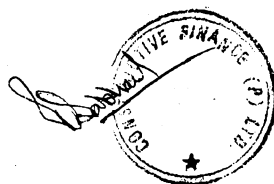
Gurugram



Registered Office : 414/1, 4th Floor, DDA Commercial Complex, District Centre, Janakpuri, New Delhi -110058

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

Name of the Target Company (TC)	PTL Enterprises Ltd.		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Constructive Finance Pvt Ltd		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited		
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 acquisition under consideration, holding of :			
a) Shares carrying voting rights			
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	3,30,17,575	49.88	49.88
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 TC (specify holding in each category)	Nil	Nil	Nil
e) Total (a+b+c+d)	3,30,17,575	49.88	49.88
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold	1,31,95,324	19.94	19.94
b) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
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	Nil	Nil
d) Shares encumbered / invoked/released by the acquirer	Nil	Nil	Nil
e) Total (a+b+c+-d)	1,31,95,324	19.94	19.94



After the acquisition/sale, holding of:			
a) Shares carrying voting rights	4,62,12,899	69.82	69.82
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
e) Total (a+b+c+d)	46212899	69.82	69.82
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter se transfer by way of gift		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	March 20,2017		
Equity share capital / total voting capital of the TC before the said acquisition / sale	6,61,88,500		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	6,61,88,500		
Total diluted share/voting capital of the TC after the said acquisition	6,61,88,500		

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of the SEBI (LODR), 2015.

(**) 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.

Signature of the acquirer / ~~seller~~ / Authorized Signatory

Place: *Gurgaon*

Date: 21/3/17

Rajan Sabharwal
RAJAN SABHARWAL

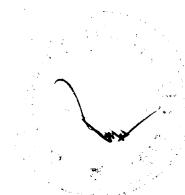
Director

(02372919)

13-CM-Type, Shalimar (Appts)

Shalimar Garden,

Main Dist Ghd-201005 ,



CONSTRUCTIVE FINANCE PVT. LTD.

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To,

Date:21.03.2017

Dept of Corporate Services Bombay Stock Exchange Limited P.J Towers, Dalal Street Mumbai – 400001	National Stock Exchange of India Limited Exchange Plaza, 5 th Floor, Plot No C/1, G Block Bandra Kurla Complex Bandra East Mumbai – 400051
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Dear Sir,

Sub: Inter-se transfer of shares amongst Promoter Group

Ref: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

In terms of Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011(Takeover Regulations) we, Constructive Finance Pvt. Ltd. forward herewith the disclosure with regard to receipt of by way of gift of 1,31,95,324 equity shares of Rs.2/- each of PTL Enterprises Limited received by us from Sunrays Properties and Investment Co. Pvt Ltd.

Both Constructive Finance Pvt. Ltd. (acquirer) and Sunrays Properties and Investment Co. Pvt Ltd. (transferee) belong to the promoter group of PTL Enterprises Limited. Hence, the aggregate holding of Promoters Group before and after the above inter se transaction remains the same.

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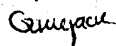
Thank you

Yours faithfully

For and behalf of Constructive Finance Pvt. Ltd


RAJAN SABHARWAL
Director
(02372919)
13-CM-Type, Shalimar (Appts).
Shalimar Garden,
Main Dist Ghd-201005

21/03/07

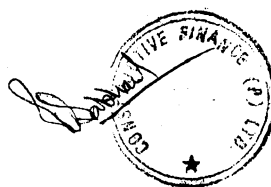




Registered Office : 414/1, 4th Floor, DDA Commercial Complex, District Centre, Janakpuri, New Delhi -110058

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

Name of the Target Company (TC)	PTL Enterprises Ltd.		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Constructive Finance Pvt Ltd		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited		
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 acquisition under consideration, holding of :			
a) Shares carrying voting rights	3,30,17,575	49.88	49.88
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 TC (specify holding in each category)	Nil	Nil	Nil
e) Total (a+b+c+d)	3,30,17,575	49.88	49.88
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold	1,31,95,324	19.94	19.94
b) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
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	Nil	Nil
d) Shares encumbered / invoked/released by the acquirer	Nil	Nil	Nil
e) Total (a+b+c+/-d)	1,31,95,324	19.94	19.94



After the acquisition/sale, holding of:			
a) Shares carrying voting rights	4,62,12,899	69.82	69.82
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
e) Total (a+b+c+d)	46212899	69.82	69.82
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter se transfer by way of gift		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	March 20,2017		
Equity share capital / total voting capital of the TC before the said acquisition / sale	6,61,88,500		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	6,61,88,500		
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(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of the SEBI (LODR), 2015.

(**) 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.

Signature of the acquirer / seller / Authorized Signatory

Place: *Gurgaon*

Date: 21/3/17

Raj Sabharwal
RAJAN SABHARWAL
 Director
 (02372919)
 13-CM-Type, Shalimar (Appts)
 Shalimar Garden,
 Main Dist Ghd-201005 ,



CONSTRUCTIVE FINANCE PVT. LTD.

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Ph.: 0124 - 4262305 / 07 / 08 ♦ Fax. 0124 - 4262306

CIN : U67120DL1988PTC250410

Date: 21.03.2017

To,

Mr. Pradeep Kumar
Company Secretary, PTL Enterprises Ltd.,
Apollo House, 7, Institutional Area, Sector 32,
Gurgaon - 122001
Corporate office

Mr. Pradeep Kumar
Company Secretary, PTL Enterprises Ltd.,
3rd floor, Areekal Mansion, Near Manorama
Junction, Panampilly Nagar, Kochi Ernakulam KL
682036
Registered office

Dear Sir,

Sub: **Inter-se transfer of shares amongst Promoter Group**

Ref: **Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

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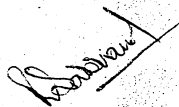
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This is for your kind information and records

Thank you

Yours faithfully

For and behalf of Constructive Finance Pvt. Ltd



RAJAN BADHARWAL

Director

(02372916)

13-CM-Type, Shelimar (Appts).

Shelimar Garden,

Main Dist Gnd-201005

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

Name of the Target Company (TC)	PTL Enterprises Ltd.		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Constructive Finance Pvt Ltd		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited		
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f) Shares carrying voting rights	3,30,17,575	49.88	49.88
g) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	Nil	Nil	Nil
h) Voting rights (VR) otherwise than by shares	Nil	Nil	Nil
i) 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
j) Total (a+b+c+d)	3,30,17,575	49.88	49.88
Details of acquisition/sale			
f) Shares carrying voting rights acquired/sold	1,31,95,324	19.94	19.94
g) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
h) 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	Nil	Nil
i) Shares encumbered / invoked/released by the acquirer	Nil	Nil	Nil
j) Total (a+b+c+/-d)	1,31,95,324	19.94	19.94



After the acquisition/sale, holding of:			
f) Shares carrying voting rights	4,62,12,899	69.82	69.82
g) Shares encumbered with the acquirer	Nil	Nil	Nil
h) VRs otherwise than by shares	Nil	Nil	Nil
i) 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
j) Total (a+b+c+d)	46212899	69.82	69.82
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter se transfer by way of gift		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	March 20,2017		
Equity share capital / total voting capital of the TC before the said acquisition / sale	6,61,88,500		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	6,61,88,500		
Total diluted share/voting capital of the TC after the said acquisition	6,61,88,500		

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of the SEBI (LODR), 2015.

(**) 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.

Signature of the acquirer / seller / Authorized Signatory

Place: Gurugram

Date: 21/3/17

RAJAN SABHARWAL

Director

(02372919)

18-OM-Type, Shalimar (Appis).

Shalimar Garden;

Main Dist Gnd-201005

CONSTRUCTIVE FINANCE PVT. LTD.

Adm. Office : SF-202, Peach Tree, C-Block, Sushant Lok-1, Gurgaon - 122002

Ph.: 0124 - 4262305 / 07 / 08 ♦ Fax. 0124 - 4262306

CIN : U67120DL1988PTC250410

Date: 21.03.2017

To,

Mr. Pradeep Kumar Company Secretary, PTL Enterprises Ltd., Apollo House, 7, Institutional Area, Sector 32, Gurgaon - 122001 Corporate office	Mr. Pradeep Kumar Company Secretary, PTL Enterprises Ltd., 3rd floor, Areekal Mansion, Near Manorama Junction, Panampilly Nagar, Kochi Ernakulam KL 682036 Registered office
--	---

Dear Sir,

Sub: **Inter-se transfer of shares amongst Promoter Group**

Ref: **Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

In terms of Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Takeover Regulations) we, Constructive Finance Pvt. Ltd. forward herewith the disclosure with regard to receipt of by way of gift of 1,31,95,324 equity shares of Rs.2/- each of PTL Enterprises Limited received by us from Sunrays Properties and Investment Co. Pvt Ltd.

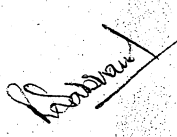
Both Constructive Finance Pvt. Ltd. (acquirer) and Sunrays Properties and Investment Co. Pvt Ltd. (transferee) belong to the promoter group of PTL Enterprises Limited. Hence, the aggregate holding of Promoters Group before and after the above inter se transaction remains the same.

This is for your kind information and records

Thank you

Yours faithfully

For and behalf of Constructive Finance Pvt. Ltd


RAJAN BADHARWAL
Director
(02372916)
13-CM-Type, Shalimar (Appts).
Shalimar Garden,
Main Dist Ghd-201005

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

Name of the Target Company (TC)	PTL Enterprises Ltd.		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Constructive Finance Pvt Ltd		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited		
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 acquisition under consideration, holding of :			
f) Shares carrying voting rights	3,30,17,575	49.88	49.88
g) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	Nil	Nil	Nil
h) Voting rights (VR) otherwise than by shares	Nil	Nil	Nil
i) 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
j) Total (a+b+c+d)	3,30,17,575	49.88	49.88
Details of acquisition/sale			
f) Shares carrying voting rights acquired/sold	1,31,95,324	19.94	19.94
g) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
h) 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	Nil	Nil
i) Shares encumbered / invoked/released by the acquirer	Nil	Nil	Nil
j) Total (a+b+c+/-d)	1,31,95,324	19.94	19.94

After the acquisition/sale, holding of:			
f) Shares carrying voting rights	4,62,12,899	69.82	69.82
g) Shares encumbered with the acquirer	Nil	Nil	Nil
h) VRs otherwise than by shares	Nil	Nil	Nil
i) 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
j) Total (a+b+c+d)	46212899	69.82	69.82
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter se transfer by way of gift		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	March 20,2017		
Equity share capital / total voting capital of the TC before the said acquisition / sale	6,61,88,500		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	6,61,88,500		
Total diluted share/voting capital of the TC after the said acquisition	6,61,88,500		

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of the SEBI (LODR), 2015.

(**) 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.

Signature of the acquirer / seller / Authorized Signatory

Place: Gurugram

Date: 21/3/17



RAJAN SABHARWAL
 Director
 (02872919)
 13-OM-Typo, Shalimar (Appis),
 Shalimar Garden,
 Main Dist Ghd-201005

SUNRAYS PROPERTIES & INVESTMENTS CO. PVT. LTD.

Admn. Office : SF 202, Peach Tree, C- Block, Sushant Lok 1, Gurgaon - 122002
Ph. No. +91 - 124 - 4262305/07/08 Fax : +91 - 124 - 4262306
CIN : U74899DL1983PTC015890

To,

Date: 21.03.2017

Mr. Pradeep Kumar
Company Secretary, PTL Enterprises Ltd.,
Apollo House, 7, Institutional Area, Sector 32,
Gurgaon - 122001
Corporate office

Mr. Pradeep Kumar
Company Secretary, PTL Enterprises Ltd.,
3rd floor, Areekal Mansion, Near Manorama
Junction, Panampilly Nagar, Kochi Ernakulam-
682036, Registered office

Dear Sir,

Sub: Inter-se transfer of shares amongst Promoter Group

Ref: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

In terms of Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Takeover Regulations) we, Sunrays Properties and Investment Co. Pvt Ltd. forward herewith the disclosure with regard to gift of 1,31,95,324 equity shares of Rs.2/- each of PTL Enterprises Limited held by us, to Constructive Finance Pvt. Ltd

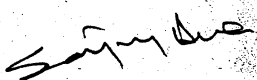
Both Constructive Finance Pvt. Ltd. (acquirer) and Sunrays Properties and Investment Co. Pvt Ltd. (transferee) belong to the promoter group of PTL Enterprises Limited. The aggregate holding of Promoters Group before and after the above inter se transaction remains the same.

This is for your kind information and records

Thank you

Yours faithfully

For and behalf of Sunrays Properties and Investment Co. Pvt Ltd


SANJAY DUA
Director (DIN-00008381)
Flat No. 704, Tower-7, Uniworld Garden,
Sohna Road, Gurgaon, Haryana-122016

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

Name of the Target Company (TC)	PTL Enterprises Ltd.		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Constructive Finance Pvt Ltd		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited		
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 acquisition under consideration, holding of :			
f) Shares carrying voting rights	1,31,95,324	19.94	19.94
g) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	Nil	Nil	Nil
h) Voting rights (VR) otherwise than by shares	Nil	Nil	Nil
i) 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
j) Total (a+b+c+d)	1,31,95,324	19.94	19.94
Details of acquisition/sale			
f) Shares carrying voting rights acquired/sold	1,31,95,324	19.94	19.94
g) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
h) 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	Nil	Nil
i) Shares encumbered / invoked/released by the acquirer	Nil	Nil	Nil
j) Total (a+b+c+/-d)	1,31,95,324	19.94	19.94

After the acquisition/sale, holding of:			
f) Shares carrying voting rights	Nil	Nil	Nil
g) Shares encumbered with the acquirer	Nil	Nil	Nil
h) VRs otherwise than by shares	Nil	Nil	Nil
i) 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
j) Total (a+b+c+d)	Nil	Nil	Nil
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter se transfer by way of gift		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	March 20,2017		
Equity share capital / total voting capital of the TC before the said acquisition / sale	6,61,88,500		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	6,61,88,500		
Total diluted share/voting capital of the TC after the said acquisition	6,61,88,500		

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of the SEBI (LODR), 2015.

(**) 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.

Signature of the acquirer / seller / Authorised Signatory

Place: 21/03/2017

Date: Gurpreet

Sanjay Dua

SANJAY DUA

Director (DIN-00008381)

704, Tower-7, Uniworld Garden,
Road, Gurgaon, Haryana-122018

SUNRAYS PROPERTIES & INVESTMENTS CO. PVT. LTD.

Admn. Office : SF 202, Peach Tree, C- Block, Sushant Lok 1, Gurgaon - 122002
Ph. No. +91 - 124 - 4262305/07/08 Fax : +91 - 124 - 4262306
CIN : U74899DL1983PTC015890

To,

Date: 21.03.2017

Mr. Pradeep Kumar Company Secretary, PTL Enterprises Ltd., Apollo House, 7, Institutional Area, Sector 32, Gurgaon - 122001 Corporate office	Mr. Pradeep Kumar Company Secretary, PTL Enterprises Ltd., 3rd floor, Areekal Mansion, Near Manorama Junction, Panampilly Nagar, Kochi Ernakulam- 682036, Registered office
--	---

Dear Sir,

Sub: Inter-se transfer of shares amongst Promoter Group
Ref: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

In terms of Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Takeover Regulations) we, Sunrays Properties and Investment Co. Pvt Ltd. forward herewith the disclosure with regard to gift of 1,31,95,324 equity shares of Rs.2/- each of PTL Enterprises Limited held by us, to Constructive Finance Pvt. Ltd

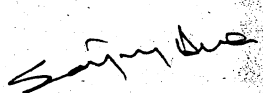
Both Constructive Finance Pvt. Ltd. (acquirer) and Sunrays Properties and Investment Co. Pvt Ltd. (transferee) belong to the promoter group of PTL Enterprises Limited. The aggregate holding of Promoters Group before and after the above inter se transaction remains the same.

This is for your kind information and records

Thank you

Yours faithfully

For and behalf of Sunrays Properties and Investment Co. Pvt Ltd


SANJAY DUA
Director (DIN-00003381)
Flat No. 704, Tower-7, Uniworld Garden,
Sohna Road, Gurgaon, Haryana-122018

After the acquisition/sale, holding of:			
f) Shares carrying voting rights	Nil	Nil	Nil
g) Shares encumbered with the acquirer	Nil	Nil	Nil
h) VRs otherwise than by shares	Nil	Nil	Nil
i) 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
j) Total (a+b+c+d)	Nil	Nil	Nil
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter se transfer by way of gift		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	March 20, 2017		
Equity share capital / total voting capital of the TC before the said acquisition / sale	6,61,88,500		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	6,61,88,500		
Total diluted share/voting capital of the TC after the said acquisition	6,61,88,500		

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of the SEBI (LODR), 2015.

(**) 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.

Signature of the acquirer / seller / Authorised Signatory

Place: 21/03/2017

Date: Gurghon

SANJAY DUA

Director (DIN-00008381)

704, Tower-7, Uniworld Garden,
Road, Gurgaon, Haryana-122018

SUNRAYS PROPERTIES & INVESTMENTS CO. PVT. LTD.

Admn. Office : SF 202, Peach Tree, C- Block, Sushant Lok 1, Gurgaon - 122002
Ph. No. +91 - 124 - 4262305/07/08 Fax : +91 - 124 - 4262306
CIN : U74899DL1983PTC015890

To,

Date: 21.03.2017

Mr. Pradeep Kumar
Company Secretary, PTL Enterprises Ltd.,
Apollo House, 7, Institutional Area, Sector 32,
Gurgaon - 122001
Corporate office

Mr. Pradeep Kumar
Company Secretary, PTL Enterprises Ltd.,
3rd floor, Areekal Mansion, Near Manorama
Junction, Panampilly Nagar, Kochi Ernakulam-
682036, Registered office

Dear Sir,

Sub: Inter-se transfer of shares amongst Promoter Group

Ref: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

In terms of Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Takeover Regulations) we, Sunrays Properties and Investment Co. Pvt Ltd. forward herewith the disclosure with regard to gift of 1,31,95,324 equity shares of Rs.2/- each of PTL Enterprises Limited held by us, to Constructive Finance Pvt. Ltd

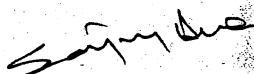
Both Constructive Finance Pvt. Ltd. (acquirer) and Sunrays Properties and Investment Co. Pvt Ltd. (transferee) belong to the promoter group of PTL Enterprises Limited. The aggregate holding of Promoters Group before and after the above inter se transaction remains the same.

This is for your kind information and records

Thank you

Yours faithfully

For and behalf of Sunrays Properties and Investment Co. Pvt Ltd



SANJAY DUA

Director (DIN-00003381)

Flat No. 704, Tower-7, Uniworld Garden,
Sohna Road, Gurgaon, Haryana - 122018

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

Name of the Target Company (TC)	PTL Enterprises Ltd.		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Constructive Finance Pvt Ltd		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited		
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 acquisition under consideration, holding of :			
f) Shares carrying voting rights	1,31,95,324	19.94	19.94
g) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	Nil	Nil	Nil
h) Voting rights (VR) otherwise than by shares	Nil	Nil	Nil
i) 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
j) Total (a+b+c+d)	1,31,95,324	19.94	19.94
Details of acquisition/sale			
f) Shares carrying voting rights acquired/sold	1,31,95,324	19.94	19.94
g) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
h) 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	Nil	Nil
i) Shares encumbered / invoked/released by the acquirer	Nil	Nil	Nil
j) Total (a+b+c+/-d)	1,31,95,324	19.94	19.94

After the acquisition/sale, holding of:			
f) Shares carrying voting rights	Nil	Nil	Nil
g) Shares encumbered with the acquirer	Nil	Nil	Nil
h) VRs otherwise than by shares	Nil	Nil	Nil
i) 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
j) Total (a+b+c+d)	Nil	Nil	Nil
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter se transfer by way of gift		
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Total diluted share/voting capital of the TC after the said acquisition	6,61,88,500		

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of the SEBI (LODR), 2015.

(**) 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.

Signature of the acquirer / seller / Authorised Signatory

Place: 21/03/2017

Date: *Sanjay Dua*

SANJAY DUA
 Director (DIN-00009381)
 704, Tower-7, Uniworld Garden,
 Gurgaon, Haryana 122018

SUNRAYS PROPERTIES & INVESTMENTS CO. PVT. LTD.

Admn. Office : SF 202, Peach Tree, C- Block, Sushant Lok 1, Gurgaon - 122002
Ph. No. +91 - 124 - 4262305/07/08 Fax : +91 - 124 - 4262306
CIN : U74899DL1983PTC015890

Date: 21.03.2017

To,

Dept of Corporate Services Bombay Stock Exchange Limited P.J Towers, Dalal Street Mumbai - 400001	National Stock Exchnage of India Limited Exchange Plaza, 5 th Floor, Plot No C/1, G Block Bandra Kurla Complex Bandra East, Mumbai - 400051
--	--

Dear Sir,

Sub: Inter-se transfer of shares amongst Promoter Group
Ref: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

In terms of Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Takeover Regulations) we, Sunrays Properties and Investment Co. Pvt Ltd. forward herewith the disclosure with regard to gift of 1,31,95,324 equity shares of Rs.2/- each of PTL Enterprises Limited held by us, to Constructive Finance Pvt. Ltd

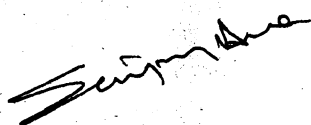
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This is for your kind information and records

Thank you

Yours faithfully

For and behalf of Sunrays Properties and Investment Co. Pvt Ltd



SANJAY DUA
Director (DIN-00008381)
Flat No. 704, Tower-7, Uniworld
Sohna Road, Gurgaon, Haryana

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

Name of the Target Company (TC)	PTL Enterprises Ltd.		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Constructive Finance Pvt Ltd		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited		
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 acquisition under consideration, holding of :			
a) Shares carrying voting rights	1,31,95,324	19.94	19.94
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
e) Total (a+b+c+d)	1,31,95,324	19.94	19.94
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold	1,31,95,324	19.94	19.94
b) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
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	Nil	Nil
d) Shares encumbered / invoked/released by the acquirer	Nil	Nil	Nil
e) Total (a+b+c+/-d)	1,31,95,324	19.94	19.94



After the acquisition/sale, holding of:			
a) Shares carrying voting rights	Nil	Nil	Nil
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
e) Total (a+b+c+d)	Nil	Nil	Nil
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter se transfer by way of gift		
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(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of the SEBI (LODR), 2015.

(**) 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.

Signature of the acquirer / seller / Authorised Signatory

Place: *Gurgaon*

Date: *21/2/2017*

Sanjay Dua

SANJAY DUA

Director (DIN-00008381)

Flat No. 704, Tower-7, Uniworld
Sohna Road, Gurgaon, Haryana



SUNRAYS PROPERTIES & INVESTMENTS CO. PVT. LTD.

Admn. Office : SF 202, Peach Tree, C- Block, Sushant Lok 1, Gurgaon - 122002
Ph. No. +91 - 124 - 4262305/07/08 Fax : +91 - 124 - 4262306
CIN : U74899DL1983PTC015890

Date: 21.03.2017

To,

Dept of Corporate Services Bombay Stock Exchange Limited P.J Towers, Dalal Street Mumbai - 400001	National Stock Exchnage of India Limited Exchange Plaza, 5 th Floor, Plot No C/1, G Block Bandra Kurla Complex Bandra East, Mumbai - 400051
--	--

Dear Sir,

Sub: **Inter-se transfer of shares amongst Promoter Group**
Ref: **Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

In terms of Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011(Takeover Regulations) we, Sunrays Properties and Investment Co. Pvt Ltd. forward herewith the disclosure with regard to gift of 1,31,95,324 equity shares of Rs.2/- each of PTL Enterprises Limited held by us, to Constructive Finance Pvt. Ltd

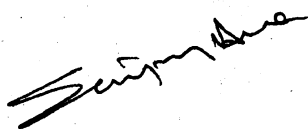
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This is for your kind information and records

Thank you

Yours faithfully

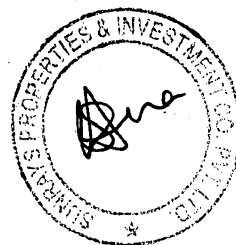
For and behalf of Sunrays Properties and Investment Co. Pvt Ltd



SANJAY DUA
Director (DIN-00008381)
Flat No. 704, Tower-7, Uniworld C
Sohna Road, Gurgaon, Haryana

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

Name of the Target Company (TC)	PTL Enterprises Ltd.		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Constructive Finance Pvt Ltd		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange Limited and National Stock Exchange of India Limited		
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 acquisition under consideration, holding of :			
a) Shares carrying voting rights	1,31,95,324	19.94	19.94
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
e) Total (a+b+c+d)	1,31,95,324	19.94	19.94
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold	1,31,95,324	19.94	19.94
b) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
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	Nil	Nil
d) Shares encumbered / invoked/released by the acquirer	Nil	Nil	Nil
e) Total (a+b+c+/-d)	1,31,95,324	19.94	19.94



After the acquisition/sale, holding of:			
a) Shares carrying voting rights	Nil	Nil	Nil
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
e) Total (a+b+c+d)	Nil	Nil	Nil
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Inter se transfer by way of gift		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	March 20, 2017		
Equity share capital / total voting capital of the TC before the said acquisition / sale	6,61,88,500		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	6,61,88,500		
Total diluted share/voting capital of the TC after the said acquisition	6,61,88,500		

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of the SEBI (LODR), 2015.

(**) 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.

Signature of the acquirer / seller / Authorised Signatory

Place: Gurgaon

Date: 21/3/2017

SANJAY DUA
 Director (DIN-00008381)
 Flat No. 704, Tower-7, Uniworld
 Sohna Road, Gurgaon, Haryana



1. Name of Listed Entity: PTL Enterprises Limited
2. Scrip Code/Name of Scrip/Class of Security: PTL
3. Share Holding Pattern Filed under: 31b
4. Share Holding Pattern as on : 31-Dec-2016
5. Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information:-

S. No.	Particulars	Yes/No
1	Whether the Listed Entity has issued any partly paid up shares?	No
2	Whether the Listed Entity has issued any Convertible Securities or Warrants?	No
3	Whether the Listed Entity has any shares against which depository receipts are issued?	No
4	Whether the Listed Entity has any shares in locked-in?	No
5	Whether any shares held by promoters are pledge or otherwise encumbered?	No
6	Whether the Listed Entity has issued any differential Voting Rights?	No

Table I - Summary Statement holding of specified securities

Category of shareholder (i)	Nos. of share (iii)	No. of fully paid up shares held (iv)	No. of Partly paid-up equity shares held (v)	No. of shares underlying Depository Receipts (vi)	Total nos. share held (VII) = (iv)+(v)+(vi)	Shareholding as a % of total (calculated per 1957)		Number of Voting Rights held in each class of securities (IX)	No. of Shares outstanding (convertible securities included) Warrant (X)	Shareholding as a % of securities (including diluted capital) (XI) = $\frac{(X)}{(A+B+C)}$ As a %	Number of Locked in shares (XII)		Number of Shares otherwise encumbered (XIII)	Number of Shares in dematerialized (XIV)
						Shareholding as a % of total (calculated per 1957)								
						As a % of (A+B+C2)								
						As a % of (A+B+C)								
A	Promoter & Promoter Group	3	46215399	0	0	46215399	69.82	46215399	0	69.82	0	0	46215399	
B	Public	6661	19973101	0	0	19973101	30.18	19973101	0	30.18	0	0	17082757	
C	Non Promoter-Non Public	0	0	0	0	0	0	0	0	0	0	0	0	
C1	Shares underlying DRs	0	0	0	0	0	0	0	0	0	0	0	0	
C2	Shares held by Employee Trusts	0	0	0	0	0	0	0	0	0	0	0	0	
Total		6664	66188500	0	0	66188500	100	66188500	0	100	0	0	63298156	

Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

Category & of the Shareholders	PAN	No. of share holder	No. of fully paid up equity share held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII = IV+V+VI)	Shareholding % (VIII) As a % of (A+B+C2)	Number of Voting Rights held each class of securities (IX)			No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Shareholding %, as assuming full conversion of convertible securities (XI) = (VII)+(X) as a % of A+B+C2	Number of Locked in shares (XII)	Number of Shares pledged or otherwise encumbered (XIII)	Number of Shares held (XIV)
								Class S X	Class S Y	Total Voting Rights as a % of Total Voting rights					
1 Indian Individuals/Hindu undivided Family		0	0	0	0	0	0	0	0	0	0	0	0	0	0
ONKARS		1	2500	0	0	2500	0	2500	0	2500	0	0	0	0	2500
KANWAR		0	2500	0	0	2500	0	2500	0	2500	0	0	0	0	2500
Central Government/ State Government(s)		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Financial Institutions/ Banks		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Any Other (specify)		2	462128990	0	0	46212899	69.82	4621289	0	4621289	69.82	0	0	0	46212899
Body Corporate		2	462128990	0	0	46212899	69.82	4621289	0	4621289	69.82	0	0	0	46212899
Sunrays Properties & Investment Co Pvt Ltd			131953240	0	0	13195324	19.94	1319532	0	13195	19.94	0	0	0	13195324
CONSTRUCTIVE FINANCE PVT LTD			330175750	0	0	33017575	49.88	3301757	0	33017	49.88	0	0	0	33017575
Sub-Total (A)(1)		3	462153990	0	0	46215399	69.82	4621539	0	4621539	69.82	0	0	0	46215399
2 Foreign Individuals (Non-Resident Individuals/ Foreign Individuals)		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Government		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Institutions		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Foreign Portfolio Investor		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Any Other (specify)		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sub-Total (A)(2)		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Shareholding of Promoter and Promoter Group (A)=(A)(1)+(A)(2)		3	462153990	0	0	46215399	69.82	4621539	0	4621539	69.82	0	0	0	46215399

Table III - Statement showing shareholding pattern of the Public shareholder

Category & Name of the Shareholders (i)	PAN (ii)	Nos. of shares held (iii)	No. of fully paid up shares held (iv)	Partly paid-up equity shares held (v)	Nos. of underlying Depository Receipts (vi)	Total nos. shares held VII = IV+V+VI	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) VIII	Number of Voting Rights held in each class of securities (ix)			Total as a % of Voting rights	No. of Shares Underlying/In convertible securities (including Warrants) (X)	Total shareholding % assuming full conversion of convertible securities (as a percentage)	Number of Locked in shares (Xii)		Number of Shares pledged or otherwise encumbered (No. of total applied shares held (Not applicable))	Number of Shares pledged or otherwise encumbered (Not applicable)	N
								No of Voting Rights	Class X	Class Y	To Total			No of Locked in shares (Xii)	As a % of total applied shares held (Xii)			
1 Institutions		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
a Mutual Funds/		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
b Venture Capital Funds		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
c Alternate Investment Funds		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
d Foreign Venture Capital Investors		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
e Foreign Portfolio Investors		1	110620	0	0	110620	17	110620	0	0	11062117	0	17	0	0	0	110620	1106
f Financial Institutions/ Banks		9	605001	0	0	605001	91	605001	0	0	60500191	0	91	0	0	0	602401	6024
g Insurance Companies/ Provident Funds/ Pension Funds		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
h Any Other (specify)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
i Sub-Total (B)(1)		10	715621	0	0	715621	1.08	715621	0	0	715621108	0	1.08	0	0	0	713021	7130
2 Central Government/ State Government(s)/ President of India		1	1500000	0	0	1500000	2.27	1500000	0	0	15000227	0	2.27	0	0	0	1500000	1500
KERALA STATE INDUSTRIAL DEVELOPMENT CORPORATION	AAACK 9434D	1	1500000	0	0	1500000	2.27	1500000	0	0	15000227	0	2.27	0	0	0	1500000	1500
Sub-Total (B)(2)		1	1500000	0	0	1500000	2.27	1500000	0	0	15000227	0	2.27	0	0	0	1500000	1500
3 Non-institutions		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
a Individuals -		6381	106195900	0	0	106195900	16.05	106195900	0	0	106195900	0	16.05	0	0	0	7751046	7751
i Individual shareholders holding nominal share capital up to Rs. 2 lakhs.		6372	45174110	0	0	45174110	6.83	45174110	0	0	45174110	0	6.83	0	0	0	3575617	3575
ii Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.		9	61021790	0	0	61021790	9.22	61021790	0	0	61021790	0	9.22	0	0	0	4175429	4175

[illegible]

Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder

Category & of the Shareholders (i)	PAN (ii)	No. of shares older (iii)	No. of fully paid up equity share held (iv)	Partly paid-up equity shares held (v)	Nos. of shares underlying Depository Receipts (vi)	Total no. shares held (VII) = (IV+V+VI)	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) (VIII)	Number of Voting Rights held each class of securities (IX)			Total as a % of Voting rights	No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Total shareholding q. as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)	Number of Locked in shares (XII)	Number of Shares pledged or otherwise encumbered (XIII)	Number of equity shares in dematerialized form (XIV) (Not Applicable)
								Class X	Class Y	Total Voting rights						
1	Custodian/DR Holder	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Non-Promoter-Non Public Shareholding (C)= (C1)+(C2)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Table II- Unclaim Details

Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.	
No. of shareholders	No of share held

Table III- Unclaim Details

Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.	
No. of shareholders	No of share held

Table III- Person in Concert

Details of the shareholders acting as persons in Concert including their Shareholding		
Name of shareholder	Name of PAC	No. of share
		Holding %