

16th July, 2019

Mr. Rakesh Parekh
Special Assistant
Listing Compliance
Bombay Stock Exchange Ltd.
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai-400001

Cc: BCC Fuba India Limited
4 KM Swarghat Roadnalagarh
Distt Solan Himachal Pradesh HP 174101

Respected Sir

Subject : Rectification of discrepancies in the disclosure under Regulation 31 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 - Target Company - BCC Fuba India Ltd (517246) for Lokesh Tayal

References : Reply to your e-mail dated 15.07.2019

Please find below my sincere submissions with respect to the above subject and reference:

1. **Format of Disclosure are not as per Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 as per SEBI Circular (format revision w.e.f. August 05, 2015)** - Please note that we have downloaded the format for disclosure under Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 from the website of SEBI which reflects the format as has been filed by me. The link of the said format is provided for your ready reference https://www.sebi.gov.in/sebi_data/commondocs/Format_27_p.pdf.

However, as suggested, I am enclosing herewith the disclosure under Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 as per the format shared by yourself and available at the BSE website.

Request you to kindly consider the above said disclosure and take the same on your records with effect from the date of original filing with your good offices.

2. **Reason for encumbrance not given (Reason for Creation of Pledge or Release or Invoke of shares not given).** - Please note that the reason for encumbrance has been mentioned in the fresh disclosure hereby enclosed.



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)

B C C FUBA INDIA LIMITED

Names of the stock exchanges where the shares of the target company are listed

BSE Ltd.

Date of reporting

28th June, 2019

Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked

Lokesh Tayal

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 [(1)-(3)]} | |
|--|--|--------------------------|---|--------------------------|---|--|--|---|---------|--------------------|---|---|--------|
| | Number | % of total share capital | Number | % of total share capital | Reasons for encumbrance ** | Type of encumbrance (pledge/ lien/ non disposal undertaking/ others) | Date of creation/ release/ invocation of encumbrance | Type of event (creation / release / invocation) | Number | % of share capital | Name of the entity in whose favor shares encumbered *** | | Number |
| Lokesh Tayal | 1339150 | 8.74 | NIL | NIL | Personal borrowing | Pledge | 27 th June, 2019 | Creation | 1000000 | 6.53 | Vidhan Infrastructure Private Limited | 1000000 | 6.53 |



Signature of the Authorized

Signatory Place : New Delhi

Date : 28th June, 2019

*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.

Further, I hereby humbly request you to kindly take the enclosed Disclosure under Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 to take on your record from the date of original filing of the said disclosure and disregard any discrepancy occurred due to inconsistency in format.

Thanking you.

Yours faithfully,



(Lokesh Tayal)
Promoter
BCC Fuba India Ltd