Detailed Public Statement (DPS) for the Equity Shareholders of

Svaraj Trading and Agencies Limited

in terms of Regulation 15(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Open Offer for Acquisition of up to 26,000 (Twenty Six Thousand Only) Equity Shares at a price of ₹ 75.00/- per equity share from the Shareholders of Svaraj Trading and Agencies Limited (hereinafter referred to as "Target Company" or "STAL") by Ms. Rekha Soni, Mr. Harendra Gupta & Mr. Shankar Das Vairagi (referred to as "Acquirers") pursuant to and in accordance with Regulations 3(1) and 4 of the Securities and Exchange Board Of India (Substantial Acquisition of Shares and Takeovers) Regulations 2011, as amended.

This detailed public statement ("DPS'') is being issued by Intensive Fiscal Services Pvt. Ltd., the Manager to the Offer ("Manager") on behalf of Ms. Rekha Soni, Mr. Harendra Gupta & Mr. Shankar Das Vairagi in compliance with Regulation 13(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and subsequent amendments thereto ("SEBI (SAST) Regulations"/"Regulations") pursuant to the Public Announcement filed on September 03, 2012 with the Stock Exchange/SEBI/TC in terms of Regulations 3(1) & 4 of the SEBI (SAST) Regulations.

I. ACQUIRERS, TARGET COMPANY AND OFFER

A. Details of Acquirers:

- Ms. Rekha Soni aged about 45 years residing at 42, Moti Chohatta, Udaipur-313001, Rajasthan, Telefax No: 0294-2523925, Mr. Harendra Gupta aged about 51 years residing at 163, Housing Board Colony, Goverdhan Villas, Udaipur, Rajasthan, Telefax No: 0294-2482644 and Mr. Shankar Das Vairagi aged about 51 years residing at 163, Housing Board Colony, Goverdhan Villas, Udaipur, Telefax No: 0294-2441035 are the Acquirers in terms of Regulation 2(1)(a) of the SEBI (SAST) Regulations, 2011.
- Presently, Ms. Rekha Soni, Mr. Harendra Gupta & Mr. Shankar Das Vairagi are engaged in Family Business, supply of Building Material, Buy and Sell of Property respectively.
- Manish Dani (Membership No. 406440), proprietor of Manish Dani & Co., Chartered Accountants having its Office at C-193, Shastri Nagar, Bhilwara (Raj.) 311 001, Phone: 01482-250085 and Mob No: 08875977741, E-mail: dani_manish@yahoo.co.in, manish.dani@icai.org has certified vide certificate dated July 27, 2012 that the Net worth of Ms. Rekha Soni, Mr. Harendra Gupta & Mr. Shankar Das Vairagi is ₹ 43.15 Lakhs (Rupees Forty Three Lakhs and Fifteen Thousand Only), ₹ 34.14 Lakhs (Rupees Thirty Four Lakhs and Fourteen Thousand Only) & ₹ 82.98 Lakhs (Rupees Eighty Two Lakhs Ninty Eight Thousand Only) respectively as on July 27, 2012 aggregating to ₹ 160.27 Lakhs (Rupees One Hundred and Sixty Lakhs & Twenty Seven Thousand Only).
- The Acquirers have acquired 61,100 shares of the Target Company constituting 61.10% of the paid up/voting capital of the Target Company pursuant to Share Purchase Agreement (referred to as "SPA") dated September 03, 2012. The Acquirers are in process of transferring shares acquired under SPA into the Escrow Account opened with BCB Brokerage Private Limited named and styled as "PSIPL ESCROW A/C SVARAJ OPEN OFFER" which will be lien marked in the name of the Manager to the offer.
- The voting rights accrued by virtue of acquisition of the said shares are frozen and any benefits accrued during the offer period on these shares will be kept in the escrow account until completion of the open offer formalities.
- As Acquirers have acquired shares pursuant to SPA dated September 03, 2012, the provisions of Chapter V of SEBI (SAST) Regulations are applicable to the Acquirers & they will comply with the provisions of Chapter V of the regulations.
- The Acquirers are not forming part of the Promoter group of the Target Company. As on date of this DPS, there is no nominee of the Acquirers on the Board of Directors of the Target Company.
- The Acquirers have not been prohibited by SEBI from dealing in securities, in terms of directions issued under Section 11B of the SEBI Act, 1992, as amended (the 'SEBI Act') or any other Regulations made under the SEBI Act.

B. Details of Sellers:

Sr. No.	Name of the Promoters / Sellers	No of Equity Shares	% of total voting capital	Address, Phone No. and Fax No.
1.	M/s. Kopran Lab Pvt. Ltd.	15,000	15.00	Parijat house, 1076, Dr. E Moses Road, Worli, Mumbai-400018 Telefax: 022-43661111
2.	M/s. S V Trading & Agencies Ltd.	5,000	5.00	1076, Dr. E Moses Road, Worli, Mumbai-400018 Telefax: 022-43662200
3.	Vandana Somani	1,510	1.51	Shreeniketan, 86-A, N.S. Road, Mumbai-400002 Telefax: 022-43661111
4.	Rajendra Somani	2,040	2.04	Shreeniketan, 86-A, N.S. Road, Mumbai-400002 Telefax: 022-24974661
5.	Mridula Somani	1,010	1.01	Shreeniketan, 86-A, N.S. Road, Mumbai-400002 Telefax: 022-24974661
6.	Surendra Somani	2,010	2.01	Shreeniketan, 86-A, N.S. Road, Mumbai-400002 Telefax: 022-43661111
7.	Jaya Somani	800	0.80	403, Olympus, Altamount Road, Mumbai-400026 Telefax: 022- 23534121
8.	Suhrid Somani	400	0.40	403, Olympus, Altamount Road, Mumbai-400026 Telefax: 022- 23534121
9.	Susheel G Somani	32,030	32.03	403, Olympus, Altamount Road, Mumbai-400026 Telefax: 022-23530576
10.	Adarsh Somani	500	0.50	Shreeniketan, 86-A, N.S. Road, Mumbai-400002 Telefax: 022-22814179
11.	Hridai Somani	800	0.80	403, Olympus, Altamount Road, Mumbai-400026 Telefax: 022-23530576
	Total	**61,100**	**61.10**	

- The Sellers have sold 61,100 shares consituting 61.10% of the total paid up/voting capital of the Target Company to the Acquirers pursuant to SPA dated September 03, 2012.
- As on date of this DPS, the Sellers are the only Promoters of the Target Company.
- Before the aforementioned transaction, the Sellers were holding 61,100 shares, representing 61.10% of the voting capital of the Target Company.
- The Sellers have not been prohibited by SEBI from dealing in securities, in terms of directions issued under Section 11B of the SEBI Act, 1992, as amended (the 'SEBI Act') or any other Regulations made under the SEBI Act.

C. Target Company (Svaraj Trading and Agencies Limited):

- The Target Company was incorporated as "Svaraj Trading and Agencies Limited" on March 17, 1980 under the provisions of the Companies Act, 1956. The present registered office of the Target Company is 1076, Dr. E. Moses Road, Worli, Mumbai 400018, Tel No: 022-24964656, Fax No: 022-24963055 and website: www.svarajtrading.com.
- As on the date of this DPS, the authorized share capital of the Target Company is ₹ 1,50,00,000/- (Rupees One Crore and Fifty Lakhs only) divided into 15,00,000 equity shares of ₹10/- each. The issued, subscribed & paid up capital of the Company is ₹ 10,00,000/- (Rupees Ten Lakhs only), comprises of 1,00,000 fully paid-up equity shares of ₹ 10/- each fully paid up.
- The trading in the equity shares of the Target Company was suspended by BSE w.e.f. February 17, 2003. The Target Company has received an In Principle approval letter dated January 25, 2011 from BSE for revocation of suspension in trading of equity shares. Thereafter the suspension in trading of equity shares was revoked w.e.f. March 23, 2011.
- As on date of this DPS, there are no partly paid up shares and no outstanding instruments in the nature of warrants / fully convertible debentures / partly convertible debentures etc. which are convertible into equity at any later date in the Target Company.
- There has been an amalgamation of M/s. Kamala Udyoga Limited with the Target Company vide Mumbai High Court order dated April 27, 2012.
- The present Board of Directors of the Target Company are Vishnunarain Deviprasad Khanna, Adarsh Rajendra Somani, Kailashprasad Govardhanlal Maheshwari & Abirchand Shreeniwas Joshi.
- The financials highlights of STAL are given below:

(Fig in Lakhs)

Financial Data	Period ended 31.03.2010 (Audited)	Period ended 31.03.2011 (Audited)	Period ended 31.03.2012 (Audited)
Total Income	30.15	35.15	9.44
Profit / (Loss) After Tax	26.74	20.78	6.01
Equity Share Capital	10.00	10.00	10.00
Earnings Per Share (₹)	26.74	20.78	6.01
Net worth	(605.93)	(585.15)	256.96
Return on Net worth (%)	(4.41%)	(3.55%)	2.34%
Book Value Per Share (₹)	(605.93)	(585.15)	256.96

(Source: Annual Report for the year ended March 31, 2010 and March 31, 2011 and Audited result for the year ended March 31, 2012)

D. Details of the Offer:

- The Acquirers hereby make this Offer to the equity shareholders (other than parties to the SPA) of the Target Company to acquire up to 26,000 (Twenty Six Thousand Only) equity shares of ₹ 10.00/- each representing 26.00% of the voting capital of the Target Company in terms of the SEBI (SAST) Regulations, at a price of ₹ 75.00/- (Rupees Seventy Five only) per fully paid up equity share ('Offer Price') payable in cash.
- The offer is made to (i) all the equity shareholders (except parties to the SPA) whose names will be appeared on the register of members of the Target Company or beneficiaries on the beneficiary records of the Depository Participant as on the Identified Date, (ii) those persons who own the shares any time prior to the closure of the tendering period, but are not the registered shareholder(s).
- This Offer is subject to the receipt of the statutory and other approvals mentioned in paragraph VI of the DPS. In terms of Regulation 23 of the SEBI (SAST) Regulations, if the statutory approvals are refused, the Offer would stand withdrawn.
- This is not a conditional Offer and not subject to any minimum level of acceptance. The Acquirers will acquire all the equity shares of the Target Company that are validly tendered as per terms of the Offer subject to the terms and conditions mentioned in this DPS and in the Letter of Offer that will be sent to the Shareholders up to a maximum of 26,000 equity shares.
- This is not a Competitive Bid in terms of Regulation 20.
- The Acquirers have not acquired any shares of the Target Company during the 12 months period prior to the date of PA, save and except those that have been acquired pursuant to the SPA dated September 03, 2012.
- The Manager to the Offer, Intensive Fiscal Services Private Limited does not hold any Equity Shares in the Target Company as on date of this DPS. The Manager to the Offer further declares and undertakes that they will not deal in their own account in the Equity Shares of the Target Company during the Offer Period.
- The SPA is subject to compliance of provisions of SEBI (SAST) Regulations and in case of non compliance with the provisions of SEBI (SAST) Regulations; the SPA shall not be acted upon.

E. As on the date of this DPS, the Acquirers do not have any intention to sell, dispose of or otherwise encumber any significant assets of STAL except in the ordinary course of business. The future policy for disposal of its assets, if any, will be decided by Target Company's Board of Directors, subject to the applicable provisions of the law and subject to the prior approval of the shareholders at a General Body Meeting of STAL in accordance with Regulation 25(2) of Regulations. However the Acquirers may give effect such alienation but subject to passing a special resolution by the shareholders of Target Company by way of a postal ballot and the notice for such postal ballot containing reasons as to why such alienation is necessary. The Acquirers intend to seek a reconstitution of the Board of Directors of the Target Company after successful completion of Offer.

F. In terms of Clause 40A of the Listing Agreement with BSE read with Rule 19A(1) of the Securities Contracts (Regulations) Rules,1957, the Target Company is required to maintain at least 25% public shareholding for listing on a continuous basis. The present Offer will result in the public shareholding of the Target Company falling below the minimum level required as per the Listing Agreement. However Acquirers undertake to bring down the non-public shareholding to the level specified and within the time permitted under Securities Contract (Regulations) Rules, 1957.

II. BACKGROUND TO THE OFFER

- The Acquirers have acquired 61,100 shares pursuant to Share Purchase Agreement entered on September 03, 2012 at a price of ₹ 50.00/- (Rupees Fifty only) per fully paid up equity share aggregating to ₹ 30,55,000/- (Rupees Thirty Lakhs Fifty Five Thousands only) (referred to as the "Sale Shares"), details of which are as follows:

Sellers			Acquirers		
Name of the Sellers	**No. of Equity Shares**	**% w.r.t. to the total paid up capital**	**Name of the Acquirers**	**No. of Equity Shares**	**% w.r.t. to the total paid up capital**
M/s. Kopran Lab Pvt. Ltd.	15,000	15.00	Ms. Rekha Soni	12,220	12.22
M/s. S V Trading & Agencies Ltd.	5,000	5.00	Mr. Harendra Gupta	12,220	12.22
Vandana Somani	1,510	1.51	Mr. Shankar Das Vairagi	36,660	36.66
Rajendra Somani	2,040	2.04			
Mridula Somani	1,010	1.01			
Surendra Somani	2,010	2.01			
Jaya Somani	800	0.80			
Suhrid Somani	400	0.40			
Susheel G Somani	32,030	32.03			
Adarsh Somani	500	0.50			
Hridai Somani	800	0.80			
Total	**61,100**	**61.10**	**Total**	**61,100**	**61.10**

- The Acquirers intend to take control over the Target Company & make changes in the Board of Directors of the Target Company subsequent to the completion of this Open Offer in accordance hereof.
- Thus Open Offer is being made by the Acquirers in compliance with Regulations 3(1) & 4 read with other applicable provisions of the SEBI (SAST) Regulations.
- The Acquirers are hereby making a mandatory Open Offer in terms of SEBI (SAST) Regulations to the equity shareholders of the Target Company to acquire 26,000 fully paid up equity shares ("Offer Size") bearing a face value of ₹ 10/- each representing 26.00% of the total issued, subscribed, paid up and voting capital of the Target Company at a price of ₹ 75.00/- (Rupees Seventy Five Only) per fully paid up equity share, payable in cash, aggregating to ₹ 19,50,000/- (Rupees Nineteen Lakhs Fifty Thousand only) subject to the terms and conditions mentioned in this DPS and in the Letter of Offer that will be circulated to the shareholders in accordance with the regulations, ("Letter of Offer"/"Offer Document") whose names appear on the register of members of the Target Company or beneficiaries on the beneficiary records of the Depository Participant as on the Identified date i.e. October 12, 2012.

OBJECT & PURPOSE OF ACQUISITION & FUTURE PLANS:

- The prime object of the Offer is to acquire substantial stake & change the control and management of the Target Company. Ms. Rekha Soni, Mr. Harendra Gupta & Mr. Shankar Das Vairagi are the only Acquirers for the proposed Open Offer. The Acquirers are yet to finalize on how they would implement the future plans. They also aim to expand the business horizon under corporate status for diversifying into different activities subject to approval of the shareholders. The Acquirers reserve the right to modify the present structure of the business in a manner which is useful to the larger interest of the shareholders. Any change in the structure that may be affected will be in accordance with the laws applicable.

III. SHAREHOLDING AND ACQUISITION DETAILS

The current and proposed shareholding of the Acquirers in the Target Company and the details of its acquisition is as follows:

Details	Ms. Rekha Soni		Mr. Harendra Gupta		Mr. Shankar Das Vairagi		Total	
	No.	%	No.	%	No.	%	No.	%
Shareholding as on date of PA	Nil	-	Nil	-	Nil	-	Nil	-
Shares acquired pursuant to SPA	12,220	12.22	12,220	12.22	36,660	36.66	61,100	61.10
Shares acquired between the PA date & the DPS date	Nil	-	Nil	-	Nil	-	Nil	-
Post offer shareholding	#						87,100**	87.10

#The Acquirers have not entered into any formal agreement with respect to the acquisition of shares through this Offer and acting together under an informal understanding.

**Assuming full acceptances

IV. OFFER PRICE

- The shares of the Target Company are listed at BSE, having Scrip Code as 503624 and Scrip ID as ZSVARAJT.
- The annualized trading turnover of the equity shares of the Target Company during Twelve calendar months preceding the month of PA (September 2011-August 2012) on BSE is detailed below:

Name of the Stock Exchange	Total Number of shares traded during the preceding 12 calendar months prior to the month of PA	Total No. of Equity shares listed	Annualized trading turnover (as % of total number of listed shares)
Bombay Stock Exchange Ltd.	-	1,00,000	-

The equity shares are thus infrequently traded on the Bombay Stock Exchange Limited within the meaning of Regulation 2(1)(j) of the SEBI (SAST) Regulations.

- The Offer Price of ₹ 75.00/- (Rupees Seventy Five only) per fully paid-up equity share of face value of ₹ 10.00/- is justified in terms of Regulation 8(2) of the SEBI (SAST) Regulations.

a)	Highest negotiated price per share for acquisition under the agreement	₹ 50.00/-	
b)	The volume-weighted average price paid or payable for acquisitions, whether by the Acquirer(s), during the fifty-two weeks immediately preceding the date of public announcement	N.A.	
c)	The highest price paid or payable for any acquisition, whether by the Acquirer(s) or by any person acting in concert, during the Twenty-six weeks immediately preceding the date of the Public announcement	N.A.	
d)	The volume-weighted average market price of shares for a period of sixty trading days immediately preceding the date of the public announcement as traded on the stock exchange where the maximum volume of trading in the shares of the target company are recorded during such period	Not Applicable (As Shares are infrequently traded)	
e)	**Other Parameters**	**For year ended March 31, 2011 (Audited)**	**For year ended March 31, 2012 (Audited)**
	Profit after Tax (Fig in Lakhs)	20.78	6.01
	Net worth (Fig in Lakhs)	(585.15)	256.96
	Book Value Per Share (₹)	(585.15)	256.96
	Earnings per Share (EPS)(₹)	20.78	6.01

(Source: Annual Report for year ended March 31, 2011 & Audited results for the year ended March 31, 2012).

- Mr. Anil Sanklecha, Proprietor of Anil Sanklecha & co. Chartered Accountants (Membership No. 099162, Firm Registration No. 017767N), having its office at A-402, Citi Scape CHS, Next to Hotel Kohinoor, Andheri Kurla Road, Andheri (E), Mumbai – 2, PH 28207575/9869126627 vide certificate dated September 03, 2012 has applied the valuation methodology prescribed by the Honorable Supreme Court of India in the case of Hindustan Lever Employees Union vs. Hindustan Lever Limited, 1995 (83 Com. Case 30). Considering aforesaid valuation methodology, the Value of shares as per Net Assets Method (NAV) comes to ₹ (23.75), as per Price Earning Capitalization Method is ₹ 72.84/- and as per Market Value Method is NIL (as shares are infrequently traded). Thus the fair value of an equity share comes to ₹ 40.65/- (Rupees Forty and Sixty Five Paisa only).
- In view of the above parameters considered and in the opinion of the Acquirers and Manager to the Offer, the Offer Price of ₹ 75.00/- per equity share is justified in terms of Regulation 8(2) of the SEBI (SAST) Regulations, 2011.
- No adjustment has been carried out in the offer price as there were no corporate actions were announced before the date of this DPS.
- Irrespective of whether a competing offer has been made or not, the Acquirers may make upward revisions to the offer price or offer size subject to the other provisions of these regulations, at any time prior to the commencement of the last three working days before the commencement of the tendering period i.e. up to October 22, 2012.
- Where the Acquirers have acquired or agreed to acquire any shares or voting rights in the Target Company during the offer period, whether by subscription or purchase, at a price higher than the offer price, the offer price shall stand revised to the highest price paid or payable for any such acquisition. Provided that no such acquisition shall be made after the third working day prior to the commencement of the tendering period and until the expiry of the tendering period. In case of revision in the Offer price, shareholders would be notified.
- Where the Acquirers acquire shares of the Target Company during the period of twenty-six weeks after the tendering period at a price higher than the offer price under these regulations, the Acquirers shall pay the difference between the highest acquisition price and the offer price, to all the shareholders whose shares were accepted in the open offer, within sixty days from the date of such acquisition. However no such difference shall be paid in the event that such acquisition is made under an Open Offer under the SEBI (SAST) Regulations or pursuant to SEBI (Delisting of Equity shares) Regulations, 2009 or open market purchases made in the ordinary course on the Stock Exchanges, not being negotiated acquisition of Equity shares whether by way of bulk deals, block deals or in any other form.

V. FINANCIAL ARRANGEMENTS

- The total fund requirement or the maximum consideration for the Offer assuming full acceptance of the Offer would be ₹ 19,50,000/- (Rupees Nineteen Lakhs Fifty Thousand only) i.e. consideration payable for acquisition of 26,000 fully paid equity shares of the Target Company at an Offer Price of ₹ 75.00/- (Rupees Seventy Five only) per equity share.
- In accordance with Regulation 17 of the Regulations, the Acquirers have opened an Escrow Account under the name and title of "SVARAJ TRDG AND AGENCIES LTD ESCROW ACCOUNT – 014406800000910" with Dhanlaxmi Bank Limited - Mumbai ("Escrow Bank") and made a deposit of ₹ 5,00,000/- (Rupees Five Lakhs only) being more than 25% of the total consideration payable in accordance with the SEBI (SAST) Regulations. In term of an agreement dated September 03, 2012 amongst the Acquirers, Manager to the Offer and the Escrow Bank ("Escrow Agreement"), Manager to the Offer have been solely authorized to operate and to realize the value lying in the Escrow Account in terms of the SEBI (SAST) Regulations.
- Manish Dani (Membership No. 406440), proprietor of Manish Dani & Co., Chartered Accountants having its Office at C-193, Shastri Nagar, Bhilwara (Raj.) 311 001, Phone: 01482-250085 and Mob No: 08875977741, E-mail: dani_manish@yahoo.co.in, manish.dani@icai.org has certified vide certificate dated July 27, 2012 that the Net worth of Ms. Rekha Soni, Mr. Harendra Gupta & Mr. Shankar Das Vairagi is ₹ 43.15 Lakhs (Rupees Forty Three Lakhs and Fifteen Thousand Only), ₹ 34.14 Lakhs (Rupees Thirty Four Lakhs and Fourteen Thousand Only) & ₹ 82.98 Lakhs (Rupees Eighty Two Lakhs Ninty Eight Thousand Only) respectively as on July 27, 2012 aggregating to ₹ 160.27 Lakhs (Rupees One Hundred and Sixty Lakhs & Twenty Seven Thousand Only).
- The Acquirers have adequate resources to meet the financial requirement under the Open Offer as certified by Manish Dani (Membership No. 406440), proprietor of Manish Dani & Co., Chartered Accountants dated September 03, 2012.
- No borrowing from any Bank / Financial Institution is being specifically made for this purpose.
- Based on the above and in light of the escrow arrangements set out above, the Manager to the Offer is satisfied with the ability of the Acquirers to implement the Offer in accordance with the Regulations as firm financial arrangements are in place to fulfill the obligations under the Regulations.
- In case of revision in the Offer Price, the Acquirers will further make Demand Deposit with the bank of difference amount between previous Offer fund requirements and revised Offer fund requirements to ensure compliance with Regulation 18(5)(a) of the SEBI (SAST) Regulations.

VI. STATUTORY AND OTHER APPROVALS

- As on date of this DPS, there are no statutory approvals required for the acquisition of equity shares that would be tendered pursuant to this Offer. If any statutory approvals are required or become applicable, the Offer would be subject to the receipt of such other statutory approvals. The Acquirers will not proceed with the Offer in the event that such statutory approvals that are required are refused in terms of Regulation 23 of the SEBI (SAST) Regulations.
- If the Acquirers are unable to make the payment to the shareholders who have accepted the open offer within such period as specified in below table tilted as "TENTATIVE SCHEDULE OF ACTIVITY" owing to non-receipt of statutory approvals as required, the Board may, where it is satisfied that such non-receipt was not attributable to any willful default, failure or neglect on the part of the Acquirers to diligently pursue such approvals, grant extension of time in terms of Regulation 18(11) of the Regulations for making payments, subject to the Acquirers agreeing to pay interest to the shareholders for the delay at such rate as may be specified.
- Where the statutory approval extends to some but not to all shareholders in respect of making payment, the Acquirers shall have the option to make payment to such shareholders in respect of whom no statutory approvals are required in order to complete the open offer.
- No approvals are required from FIs / Banks for the Offer.
- The Offer would be subject to all other statutory approvals that may become applicable at a later date before the completion of the Offer.

VII. TENTATIVE SCHEDULE OF ACTIVITY

Schedule of Activities	Date	Day
Date of Public Announcement	September 3, 2012	Monday
Date of Detailed Public Statement	September 10, 2012	Monday
Date by which Draft Letter of Offer will be filed with the SEBI	September 17, 2012	Monday
Last date for a Competitive Bid, if any	October 3, 2012	Wednesday
Date of receipt of the comments on Draft Letter of Offer from SEBI	October 10, 2012	Wednesday
Identified Date*	October 12, 2012	Friday
Date by which Letter of Offer will be dispatched to the Shareholders	October 19, 2012	Friday
Last date for Revising the Offer Price / Number of Equity Shares	October 22, 2012	Monday
Last Date of announcement containing reasoned recommendation by committee of independent directors of STAL	October 23, 2012	Tuesday
Date of Advertisement announcing the schedule of activities for the open offer, status of statutory & other approvals, status of unfulfilled conditions (if any), Procedure for tendering acceptances etc.	October 29, 2012	Monday
Date of opening of the Tendering Period	October 30, 2012	Tuesday
Date of closing of the Tendering Period	November 12, 2012	Monday
Date by which the acceptance / rejection would be intimated and the corresponding payment for the acquired shares and / or share certificate for the rejected shares will be dispatched	November 29, 2012	Thursday

**** "Identified Date" is only for the purpose of determining the Shareholders as on such date to whom the letter of offer would be mailed. It is clarified that all owners (registered or unregistered) of the equity shares of the Target Company (except the Acquirers and the Sellers) who own the shares of the STAL are eligible to participate in the Offer any time before the closing of the tendering period.***

VIII. PROCEDURE FOR TENDERING THE SHARES IN CASE OF NON RECIEPT OF LOF

- The Acquirers have appointed Purva Sharegistry (India) Pvt. Ltd. as Registrar to the Open offer ("Registrar") The shareholders who wish to accept the offer and tender their shares pursuant to this Offer will be required to send their share certificate(s), transfer deed(s) and/or Delivery Instruction slip, duly filled Form of Acceptance cum-Acknowledgement and such other documents as may be specified in the Letter of Offer to the Registrar to the Offer as mentioned below either by Hand Delivery or by Registered Post/Courier, on or before the date of Closure of the tendering period i.e. November 12, 2012 in accordance with the instructions specified in the Letter of Offer and in the Form of Acceptance cum Acknowledgement. The documents can be tendered at the centre given below between 10:00 hours to 17:00 hours from Monday to Friday and from 10:00 hours to 14:00 hours on Saturday. The centre will be closed on Sundays and Public holidays.

Contact Person	Address	Tel. No.	Fax No.	E-mail ID
Mr. V B Shah	Purva Sharegistry (India) Pvt. Ltd. 9 Shiv Shakti Ind. Estate, J R Boricha Marg, Lower Parel (E), Mumbai 400 011	022-2301 6761	022-2301 2517	busicomp@vsnl.com

- Neither the share certificate(s) nor transfer deed(s)/Delivery Instruction slip nor the Form of Acceptance should be sent to the Sellers or to the Acquirers or the Target Company or the Manager to the Offer.
- For shareholders holding their shares in Demat Form, the Registrar to the Offer- Purva Sharegistry (India) Pvt Ltd. has opened a Special Depository Account with "BCB Brokerage Private Limited" registered with Central Depository Services (India) Limited (CDSL), DP Id number 12010400 styled "PSIPL Escrow A/c Svaraj Open Offer". The Beneficiary Account no is 00036779. Shareholders having their beneficiary account with National Securities Depository Limited (NSDL) have to use Inter depository delivery instruction slip for the purpose of crediting their shares in favour of the Special Depository Account with CDSL.
- Shareholders/Beneficial owners (holders of shares in dematerialized form) of the Target Company who wish to tender their shares will be required to send their Form of Acceptance cum Acknowledgement along with a photocopy of the delivery instructions in "Off-Market" mode or counterfoil of the delivery instruction in "Off-Market" mode, duly acknowledged by the Depository Participant ("DP"), in favour of the Special Depository Account, in accordance with the instructions to be specified in the Letter of Offer and Form of Acceptance, to the Registrar to the Offer either by hand delivery or by Registered Post between 10:00 hours to 17:00 hours from Monday to Friday and from 10:00 hours to 14:00 hours on Saturday, so as to reach on or before the closure of the tendering period i.e. not later than November 12, 2012, at the address given above.
- Shareholders who are holding their shares in physical form and wish to tender their shares will be required to send the Form of Acceptance, original Share Certificate(s) and Blank Transfer deed(s) duly signed, in accordance with the instructions specified in the Letter of Offer and the Form of Acceptance to the Registrar to the Offer i.e. Purva Sharegistry (India) Pvt. Ltd. either by hand delivery or Registered Post/courier so as to reach on or before the closure of the tendering period i.e. not later than November 12, 2012, at the address given above.
- In case of (a) shareholders who have not received the Letter of Offer/FOA, (b) unregistered shareholders and (c) owner of the shares who have sent the shares to the Target Company for transfer, may send their consent to the Registrar to the Offer on plain paper, stating the name, addresses, number of shares held, distinctive numbers, folio numbers, number of shares offered along with the documents to prove their title to such shares such as broker note, succession certificate, original share certificate/original letter of allotment and valid share transfer deeds (one per folio)/delivery instruction slip, duly signed by all the shareholders (in case of joint holdings in the same order as per the specimen signatures lodged with the Target Company), and witnessed (if possible) by the notary public or a bank manager or the member of the stock exchange with membership number, as the case may be, so as to reach the Registrar on or before 5:00 p.m. up to the date of closure of this tendering period i.e. November 12, 2012. Such shareholders can also obtain the Letter of Offer from the Registrar to the Offer by giving an application in writing clearly marking the envelope "STAL Open Offer".
- No indemnity is required from unregistered shareholders.
- Applications in respect of the equity shares of the Target Company that are the subject matter of litigation wherein the shareholder(s) may be precluded from transferring the shares during the pendency of the said litigation are liable to be rejected in case directions/orders regarding these equity shares are not received together with the shares tendered under this Offer prior to the date of the closing of this tendering period.
- Applications which are complete in all respect and which reach the Registrar on or before the date of closure of tendering period i.e. November 12, 2012 would be approved and accepted by the Acquirers. The payment of consideration for the applications so accepted will be made through a crossed account payee cheque/ demand draft / pay order or through Direct Credit ('DC'), National Electronic Funds Transfer ('NEFT'), Real Time Gross Settlement ('RTGS'), Electronic Clearing Services (ECS) at specified centers where clearing houses are managed by the Reserve Bank of India within 10 days from the date of closure of the tendering period. The intimation regarding acceptance of applications and payment of consideration will be dispatched to the shareholders by registered/speed post at the shareholders' sole risk. In case of joint holder(s), the cheque/demand draft will be drawn in the name of the first holder and in case of unregistered owners of shares the consideration will be paid to the person whose name is stated in the contract note.
- Where the number of shares offered for sale by the shareholders are more than the shares agreed to be acquired by the Acquirers, they will accept the shares received from the shareholders on a proportionate basis, in consultation with the Manager to this Offer, taking care to ensure that the basis of acceptance is decided in a fair and equitable manner and does not result in non-marketable lots, (provided that acquisition of shares from a shareholder shall not be less than the minimum marketable lot) or the entire holding if it is less than the marketable lot. The marketable lot of the Target Company is 1 (One) in case of Demat shares and 50 (Fifty only) in case of Physical shares. In case of acceptance on a proportionate basis, the unaccepted share certificates, transfer forms and other documents, if any, will be returned by registered post at the shareholders' / unregistered owners' sole risk to the first holder of equity shares.
- The Registrar to the Offer will hold in trust the share(s) certificates, Delivery Instructions Slip, Form of Acceptance cum Acknowledgement, if any, and the transfer form(s) on behalf of the shareholders of the Target Company who have accepted this Offer, until the cheque / drafts for the consideration and / or the unaccepted shares / share certificates are dispatched / returned.

IX. DETAILED PROCEDURE FOR TENDERING THE EQUITY SHARES IN THE OPEN OFFER WILL BE AVAILABLE IN THE LETTER OF OFFER.

X. OTHER INFORMATION

- Pursuant to Regulation 12 of the SEBI (SAST) Regulations, the Acquirers have appointed Intensive Fiscal Services Private Limited as Manager to the Offer and Purva Sharegistry (India) Pvt. Ltd. as Registrar to the Offer.
- This Detailed Pubic Statement would also be available at SEBI's website, www.sebi.gov.in
- This Detailed Pubic Statement is being issued on behalf of the Acquirers by the Manager to the Offer.
- The Acquirers accept full responsibility for the information contained in PA and DPS and also for the fulfillment of their obligations as laid down in the SEBI (SAST) Regulations and subsequent amendments made thereof.

Manager to the Offer	Registrar to the Offer
intensive **Intensive Fiscal Services Private Limited** 131, C-wing, Mittal Tower, 13th floor, Nariman Point, Mumbai- 400021 Tel. Nos.: 022 22870443/44/45 Fax No.: 022 22870446 E-mail: rishabh@intensivefiscal.com Contact Person: Rishabh Jain/Nikesh Jain SEBI Registration No.: INM000011112	PURVA **Purva Sharegistry (India) Pvt. Ltd.** 9 Shiv Shakti Ind. Estt., J R Boricha Marg, Lower Parel (E), Mumbai 400 011 Tel: 022 2301 6761; Fax: 022-2301 2517 E mail: busicomp@vsnl.com Contact Person: Mr. V B Shah SEBI Registration No.: INR000002102

For and On behalf of Ms. Rekha Soni, Mr. Harendra Gupta & Mr. Shankar Das Vairagi

Place : Udaipur
Date : September 08, 2012

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