



Surana Group

BHAGYANAGAR PROPERTIES LIMITED

Registered Office:

SY. No.221 to 224 Part
Vattinagulapally, Rajendra Nagar Mandal
Ranga Reddy Dist., Hyderabad-500 032. Telangana

Tel. : +91 40 27845119, 44665700

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E.mail :surana@surana.com

Website : www.bhagyanagarproperties.com

CIN No.: L70102TG2006PLC050010

BPL/SECT/012/2022-23

Date: 25th April, 2022

The Secretary, National Stock Exchange of India Ltd., Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai- 400 051 Scrip Code: BHAGYAPROP	The Secretary, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400 001 Scrip Code: 540621
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Dear Sir/ Madam,

Subject: Disclosure under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 in relation to the outcome of the meeting of the Board of Directors (“Board”) of Bhagyanagar Properties Limited (“Company”) held on 25th April, 2022.

This is with reference to the captioned subject and in continuation to our intimation letters that the Company has received the initial public announcement dated 18th April, 2022 made by akasam consulting private limited, Manager to the Offer, on behalf of Mr Narender Surana (“Acquirer 1”) Mr Devendra Surana (“Acquirer 2”), Mrs Sunita Surana (“Acquirer 3”), Mrs Namrata Surana (“Acquirer 4”), M/s Surana Infocom Private Limited (“Acquirer 5”), M/s Surana Telecom and Power Limited (“Acquirer 6”) and M/s Bhagyanagar Securities Private Limited (“Acquirer 7”) (Acquirer 1, Acquirer 2, Acquirer 3, Acquirer 4, Acquirer 5, Acquirer 6, and Acquirer 7 are collectively referred to as the “Acquirers”) on behalf of the promoter group of the Company (“Promoter Group”), in accordance with Regulation 8 of the Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (“Delisting Regulations”) inter alia expressing the intention of the Acquirers along with the Promoter Group to (a) acquire all the equity shares of the Company having face value of INR 2 (Indian Rupees Two only) each (“Equity Shares”) that are held by public shareholders of the Company; and (b) consequently, voluntarily delist the Equity Shares from the stock exchanges where the Equity Shares are presently listed, namely BSE Limited (BSE) and National Stock Exchange of India Limited (NSE), by making a delisting offer in accordance with Delisting Regulations (“Delisting Proposal”).

A meeting of the Board of Directors of the Company was held today i.e., 25th April, 2022, wherein the Board *inter-alia* considered the following:



1. Reviewed and took on record the Due-Diligence Report dated 24th April, 2022 (“Report”), submitted by Mrs. Rakhi Agarwal, Peer Review Company Secretary in compliance with Regulation 10 and other applicable provisions of the SEBI Delisting Regulations. The same is annexed as **Annexure A**.




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2. Based on the information available with the Company and the Due-Diligence Report, in accordance with Regulation 10(2) and other applicable provisions of the SEBI Delisting Regulations, the Board, certified that:
 - a. The Company is in compliance with the applicable provisions of securities laws;
 - b. The Acquirers and their related entities are in compliance with the applicable provisions of securities laws in terms of the Due-Diligence Report of the Peer Review Company Secretary including compliance with Regulation 4(5) of the SEBI Delisting Regulations; and
 - c. The Delisting Proposal, in the opinion of the Board, is in the interest of the shareholders of the Company.
3. After discussing and considering various factors of the Due-Diligence Report, granted approval in accordance with Regulation 10(1) and other applicable provisions of the SEBI Delisting Regulations to the Delisting Proposal and consequent voluntary delisting of the Equity Shares of the Company from the stock exchanges where the Equity Shares are presently listed, namely BSE Limited and National Stock Exchange of India Limited, subject to receipt of approval of the shareholders of the Company and all other necessary regulatory or statutory approvals, as may be required, for the Delisting Proposal.
4. Approved the draft of the postal ballot notice along with explanatory statement to seek the approval of the shareholders for the Delisting Proposal by way of special resolution through postal ballot and e-voting in accordance with Regulation 11 of the SEBI Delisting Regulations and other applicable laws. The Company has been authorized to issue and dispatch the aforesaid postal ballot notice and the explanatory statement to the shareholders of the Company, in accordance with the Companies Act, 2013 and other relevant applicable laws. In this regard, the Company has appointed Mrs. Rakhi Agarwal, Practicing Company Secretary bearing Membership Number F7047 and Certificate of Practice Number No. 6270, as a scrutinizer in terms of the Companies Act, 2013, read with the Companies (Management and Administration) Rules, 2014, to conduct the process of the postal ballot in a fair and transparent manner.
5. Authorized the Company, to obtain approvals from BSE Limited and National Stock Exchange of India Limited in accordance with the provisions of the SEBI Delisting Regulations, as well as any other regulatory approvals, as may be required, in relation to the Delisting Proposal.
6. The Board took on record the letter dated 25th April, 2022 received from the Acquirers informing the Company that:
 - a. the floor price for the delisting offer is INR 33.34 (Thirty Three Rupees and Thirty Four paisa only) per Equity Share, which is determined in accordance with Regulation 20(2) of the SEBI Delisting Regulations read with Regulation 8 of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. In support of the aforesaid, the letter was accompanied by a certificate dated 21st April, 2022 issued by M/s. Luharuka & Associates, Chartered Accountants & Statutory Auditors of the Company; and

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b. the Indicative Price for the delisting offer is INR 34/- (Indian Rupees Thirty Four only).

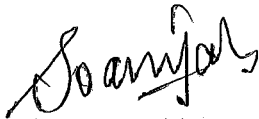
The audit report in accordance with Regulation 76 of the SEBI (Depositories and Participants) Regulations, 2018 read with Regulation 12(2) of the SEBI Delisting Regulations, in respect to the Equity Shares proposed to be delisted, covering a period of 6 months (from 1st October, 2021 to 24th April, 2022) is annexed as **Annexure B**.

We request you to kindly take the above on your record.

Thanking you,

Yours sincerely,

For **BHAGYANAGAR PROPERTIES LIMITED**



SONAL JAJU
COMPANY SECRETARY



Encl: as above



RAKHI AGARWAL
Company Secretary in Practice

6-3-660, Flat 520, Block 4,
Amrit Apartments, Kapadia Lane,
Somajiguda, Hyderabad- 500082
Email: rakhiagarwal79@yahoo.com
Cell: +91 9246530679

Due Diligence Report

[Pursuant to Regulation 10(3) of the SEBI (Delisting of Equity Shares) Regulations, 2021]

To
The Board of Directors of
Bhagyanagar Properties Limited
Sy.no. 221 - 224 Part, Vattinagulapally,
Rajendranagar Mandal, Rangareddy District,
Hyderabad – 500032.

Dear Sir(s)/Madam,

In terms of Regulation 10 of the Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (herein after called as “**SEBI Delisting Regulations**”), I, Rakhi Agarwal, Practicing Company Secretary, Peer Reviewed Practicing Company Secretary (bearing Peer Review Certificate No. 808/2020), having been appointed by the Board of Bhagyanagar Properties Limited (the “**Company**”), having CIN: L70102TG2006PLC050010, having its registered office at Sy. nos. 221-224 Part, Vattinagulapally, Rajendranagar Mandal, Rangareddy, Hyderabad - 500032 through a resolution by circulation, to carry out the due diligence in accordance with Regulation 10(3) and other applicable provisions under SEBI Delisting Regulations and issue a Due Diligence Report (the “**DDR**”).

1. Background:

(a) The Company has received an Initial Public Announcement dated 18th April, 2022, (“Initial Public Announcement”) from Mr. Narender Surana (“**Acquirer 1**”) Mr. Devendra Surana (“**Acquirer 2**”), Mrs. Sunita Surana (“**Acquirer 3**”), Mrs. Namrata Surana (“**Acquirer 4**”), M/s. Surana Infocom Private Limited (“**Acquirer 5**”), M/s. Surana Telecom and Power Limited (“**Acquirer 6**”) and M/s. Bhagyanagar Securities Private Limited (“**Acquirer 7**”) (Acquirer 1, Acquirer 2, Acquirer 3, Acquirer 4, Acquirer 5, Acquirer 6, and Acquirer 7 are collectively referred to as the “**Acquirers**”), forming part of promoter and promoter group of the Company, in accordance with Regulation 8 of the SEBI Delisting Regulations, inter alia expressing their intention to: (a) acquire 79,98,755 fully paid up Equity Shares of the Company, having face value of INR 2/- each representing 25% of the paid up equity capital of the Company that are held by public shareholders (as defined under the SEBI Delisting Regulations and to be referred to as “**Public Shareholders**”) either individually/ collectively or together with other members of the Promoter Group or along with the persons acting in concert, as the case may be; and (b) consequently voluntarily delist the Equity Shares from the stock exchange where the Equity Shares of the Company are presently listed i.e., National Stock Exchange of India Limited (“**NSE**”) and BSE Limited (“**BSE**”) (NSE and BSE are collectively referred to as “**Stock Exchanges**”), by making delisting offer in accordance with the SEBI Delisting Regulations (“**Delisting Proposal**”).

(b) The present capital structure of the Company is as under:

Particulars	Amount
Authorised Share Capital	6,50,00,000
- 3,25,00,000 equity shares of Rs.2/- each	

Issued Share Capital	6,39,90,000
- 3,19,95,000 equity shares of Rs.2/- each	
Subscribed and Paid-up Share Capital	6,39,90,000
- 3,19,95,000 equity shares of Rs.2/- each	

(c) Shareholding Pattern of the Company as on 24th April, 2022 is as set forth below:

Category	No. of shares held	%age
Promoter and Promoter Group		
- Acquirers, who decided to make an offer to the public shareholders for delisting of equity shares	1,74,55,508	54.56
- Other persons/entities forming part of the Promoter and Promoter Group along with persons acting in concert	65,40,737	20.44
Public shareholders	79,98,755	25.00
Total	3,19,95,000	100.00

(d) The distribution of shareholding including promoter of the Company as on 24th April, 2022 is as set forth below:

Range of shareholding	No. of Shareholders	% of Shareholders	No. of shares held	% of Shares
1-5000	8,388	96.75	1,756,052	5.49
5001- 10000	124	1.43	462,352	1.45
10001- 20000	50	0.58	384,503	1.20
20001- 30000	27	0.31	350,335	1.09
30001- 40000	10	0.12	179,810	0.56
40001- 50000	6	0.07	142,635	0.45
50001- 100000	21	0.24	754,175	2.36
100001& Above	44	0.51	27,965,138	87.40
Total	8,670	100.00	31,995,000	100.00

2. Purpose and Requirement of the SEBI Delisting Regulations:

2.1 In terms of Regulation 10(2) of the SEBI Delisting Regulations, the Board of Directors of the Company is required to:

(a) Obtain and furnish the details of buying, selling and dealing in the Equity Shares of the Company, by the Acquirers and their related entities (including members of Promoter Group) during the period of two years prior to the date of board meeting (i.e., 25th April, 2022) held to consider the proposal for delisting, including the details of top twenty-five public shareholders for the said period and the details of off-market transactions of all such shareholders for a period of two years;

(b) Obtain and furnish such further details as may be sought by the Peer Review Company Secretary.

2.2 In terms of Regulation 10(3) of the SEBI Delisting Regulations, the Peer Review Company Secretary is required to carry out the due-diligence and submit a report to the Board of Directors of the Company

2.3 This report is submitted in terms of Regulation 10 (3) of the SEBI Delisting Regulations to enable the Board of Directors of the Company to comply with the provisions of Regulations 10 of the SEBI Delisting Regulations and shall be used by the Company only for this purpose and for no other purpose whatsoever. The Company shall submit this report to the Board of Directors of the Company, the

Acquirers, the Promoter & Promoter Group, the stock exchanges, other regulatory authorities as may be required and the Manager to the Delisting Offer.

3. Methodology for Due Diligence:

For the purpose of our review and analysis of the details of buying, selling and dealing in the equity shares of the company by the acquirers or its related entities and the top 25 public shareholders during the period of two years prior to the date of board meeting, we requested the Company to obtain the following:

- (a) details of the trading on the Stock Exchanges in the Equity Shares of the Company for the period from 25th April, 2020 till 24th April, 2022 undertaken by the top 25 Public Shareholders and also Acquirers, its related entities and the Promoter/Promoter Group of the Company as on the date immediately preceding the date of the Board Meeting (“Review Period”), in accordance with Regulation 10(2)(a) and other relevant provisions of the SEBI Delisting Regulations.
- (b) weekly Beneficial Positions statements (“Benpos”) as forwarded by the Company (sent by Registrar & Transfer Agent of the Company viz., KFin Technologies Limited (“Registrar” or “RTA”)) in relation to Top 25 Public Shareholders, Acquirers, its related entities, Promoter & Promoter Group for the period from 25th April, 2020 till 24th April, 2022, including the above referred period of two years for verifying the off-market trades undertaken by such shareholders.

[Note: For the purpose of carrying out Due-Diligence in accordance with Regulation 10(3) of SEBI Delisting Regulations, the details shall be obtained for a period of two years prior to the date of Board Meeting held to consider the proposal for delisting, which is scheduled on Monday, 25th April, 2022 and since the previous two days i.e., Saturday, 23rd April, 2022 and Sunday, 24th April, 2022 are trading holidays, the benpos as on 22nd April, 2022 was considered for the purpose of carrying out Due-diligence.]

4. Documents, Information and Data sourced and relied:

In order to carry out our Due Diligence and to prepare this Report, we have reviewed, analyzed and relied on the following documents and information obtained from the Company, Registrar, Stock Exchanges, as well as information available on the websites of Stock Exchanges and in public domain:

- 4.1 Details of buying, selling and dealing in the equity shares of the Company on the Stock Exchanges by the Acquirers, its related entities, Promoter and Promoter Group during the period from 25th April, 2020 till 24th April, 2022 annexed herewith as **Annexure I**;
- 4.2 Details of off market transactions by the Acquirers, its related entities, Promoter and Promoter Group during the period from 25th April, 2020 till 24th April, 2022 annexed herewith as **Annexure II**;
- 4.3 Details of buying, selling and dealing in the equity shares of the Company by the Top 25 public shareholders during the period from 25th April, 2020 till 24th April, 2022 annexed herewith as **Annexure III**;
- 4.4 Representation letter dated 24th April, 2022 from the Acquirers confirming that to the best of their knowledge, none of the public entities / persons mentioned in the list of top 25 (twenty-five) Public Shareholders is related to Acquirers (including the Promoter and Promoter Group) (“Representation Letter from Acquirers”).
- 4.5 Based on the information available on the stock exchange, the compliances / disclosures by the Promoter and Promoter Group during the Review Period under Securities and Exchange Board of

India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (“SEBI SAST Regulations”) and the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“SEBI PIT Regulations”), Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”) and amendments thereto. However, we note that Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (“SEBI SBEB Regulations”) are not applicable to the Acquirer(s).

- 4.6 We have considered the compliances / disclosures by the Top 25 public shareholders during the Review Period based on the available information on the websites of the Stock Exchanges under SEBI SAST Regulations and amendments thereto. However, we note that SEBI LODR Regulations, SEBI PIT Regulations need not be verified for the buying, selling and dealing in the equity shares of the Company by the Top 25 public shareholders.
- 4.7 For the purpose of verifying details in relation to the term “related entities of the acquirers” as specified in regulation 10(2)(a) of the SEBI Delisting Regulations, we have considered the definition of “Acquirers” given in Regulation 2(1)(b)(ii) of SEBI Delisting Regulations and other Promoter and Promoter Group persons / entities as given under Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (SEBI ICDR Regulations). We have considered the name and shareholding of the Promoter and Promoter Group to ensure that it does not appear in the Top 25 Public Shareholders.
- 4.8 We have also analysed the shareholding pattern filed by the Company with the Stock Exchange for the last two years beginning from the quarter ended 31st March, 2020 to 31st March, 2022.

5. Certification:

- 5.1 Based on review of the trade data, RTA Benpos, Representation letter dated 24th April, 2022, we hereby certify that, during the review period;
- a. The buying, selling and dealing in the equity shares of the company carried out by the Acquirers or its related entities and the top twenty-five public shareholders is in compliance with the applicable provisions of securities laws;
- b. The Acquirers have not, directly or indirectly, -
- (i) employed any device, scheme or artifice to defraud any shareholder or other person; or
- (ii) engaged in any transaction or practice that operates as a fraud or deceit upon any shareholder or other person; or
- (iii) engaged in any act or practice that is fraudulent, deceptive or manipulative
- in connection with delisting of Equity Shares of the Company sought or permitted or exit opportunity given or other acquisition of Equity Shares made under the SEBI Delisting Regulations.

6. Assumption & Limitation of Scope & Review:

Representation letter dated 24th April, 2022 from the Acquirers confirming that to the best of their knowledge none of the public entities/persons mentioned in the list of Top 25 (twenty-five) Public Shareholders are related to acquirers and other matters.

- 6.1 Ensuring the authenticity of documents and information furnished is the responsibility of the Board of Directors of the Company.
- 6.2 This DDR is based on due diligence of documents/ information shared by the Company for our review. Our responsibility is to give report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion. Therefore, this due diligence shall not be construed as an investigation or forensic audit.
- 6.3 Certain Top 25 Public Shareholders are intermediaries registered with the Securities and Exchange Board of India e.g. Stock Broker. The said holding by a Stock Broker may be in the form of shares held as margin or pending for transfer to the demat account of their client/s. Accordingly, the status of beneficial ownership of Equity Shares of the Company by such Stock Broker cannot be confirmed or verified.
- 6.4 Various concepts viz. defraud, deceit, fraudulent, deceptive, manipulative are used in the SEBI Delisting Regulations. However, parameters / methodology for determining the same are not prescribed therein. By reading these terminologies, it can be construed that the Acquirers shall not directly or indirectly cause any loss to the Public Shareholders by adopting any malpractice.
- 6.5 Based on publicly available information, we have checked whether the Acquirers or the Company has common registered office or directorship. We do not have any negative observation.
- 6.6 We are not expressing any opinion on the floor price and/or the price at which the shares would ultimately be delisted. We have assumed that the Company/Acquirer(s) would comply with the applicable provisions related to floor price. Further, we are not an investment adviser or tax advisor or a broker / dealer. This report should not be construed as investment / disinvestment advise.
- 6.7 This DDR is solely for the intended purpose of delisting of Equity Shares of the Company and for your information and it is not to be used, circulated, quoted or otherwise referred to for any purpose other than Delisting purposes and as required under the SEBI Delisting Regulations.

Date: 24th April, 2022
Place: Hyderabad

RAKHI
AGARWAL

Mrs. Rakhi Agarwal
Practicing Company Secretary
FCS 7047, CP No. 6270
UDIN: F007047D000195862

Annexure I

**Details of buying, selling and dealing in the equity shares of the Company on the Stock Exchanges
by the Acquirers, its related entities, Promoter and Promoter Group during the period from
25th April, 2020 till 24th April, 2022**

Name of the Promoter/ Promoter Group	Folio Nos/ DP IDs in which shares held	Shareholding as on 25 th April, 2020		Buy/ Credit in demat account	Sell/ Debit in demat account	Shareholding as on 24 th April, 2022	
		No. of shares	%age			No. of shares	%age
Narender Surana	IN30021426886133	1743511	5.4493	-	-	1743511	5.4493
Narender Surana	IN30102220404185	1816237	5.6766	-	-	1816237	5.6766
Devendra Surana	IN30102220404193	2085414	6.5179	-	-	2085414	6.5179
Devendra Surana	IN30021426757588	1052293	3.2889	-	-	1052293	3.2889
Namrata Surana	IN30102220952848	2725837	8.5196	-	-	2725837	8.5196
Sunita Surana	IN30102220952839	2497133	7.8048	-	-	2497133	7.8048
Vinita Surana	IN30102220714362	763713	2.387	-	-	763713	2.387
Manish Surana	IN30021426739139	2	0.0000	-	-	2	0.0000
Manish Surana	IN30102221020636	2459410	7.6869	-	-	2459410	7.6869
Nivriti Samkit Jain	IN30102220976106	347500	1.0861	-	-	347500	1.0861
Rahul Surana	IN30102220976069	1404500	4.3897	-	-	1404500	4.3897
Shresha Surana	IN30021426780585	302916	0.9468	-	-	302916	0.9468
Sresha Surana	IN30102220977233	282000	0.8814	-	-	282000	0.8814
Mitali Surana	IN30102220975700	300000	0.9376	-	-	300000	0.9376
Advait Surana	1203070000210310	161541	0.5049	-	-	161541	0.5049
G M Surana (HUF)	IN30102220975718	178775	0.5588	-	-	178775	0.5588
Narender Surana (HUF)	IN30102221451316	106500	0.3329	-	-	106500	0.3329
Devendra Surana (HUF)	IN30102221450735	67500	0.211	-	-	67500	0.211
G M Surana (HUF)	IN30102220975726	166380	0.52	-	-	166380	0.52
Bhagyanagar Securities Pvt Limited	1203070000101364	49000	0.1531	-	-	49000	0.1531
Surana Infocom Private Limited	1203070000102957	371576	1.1614	-	-	371576	1.1614
Surana Telecom and Power Limited	1203070000102976	1143736	3.5747	-	-	1143736	3.5747
Surana Infocom Private Limited	IN30102221457959	3970771	12.4106	-	-	3970771	12.4106

Annexure II

Details of off market transactions by the Acquirers, its related entities, Promoter and Promoter Group during the period from 25th April, 2020 till 24th April, 2022

Name of the Promoter/ Promoter Group	Folio Nos /DP IDs in which shares held	Shareholding as on 25 th April, 2020		Buy/ Credit in demat account	Sell/ Debit in demat account	Shareholding as on 24 th April, 2022	
		No.of shares	%age			No.of shares	%age
Narender Surana	IN30021426886133	1743511	5.4493	-	-	1743511	5.4493
Narender Surana	IN30102220404185	1816237	5.6766	-	-	1816237	5.6766
Devendra Surana	IN30102220404193	2085414	6.5179	-	-	2085414	6.5179
Devendra Surana	IN30021426757588	1052293	3.2889	-	-	1052293	3.2889
Namrata Surana	IN30102220952848	2725837	8.5196	-	-	2725837	8.5196
Sunita Surana	IN30102220952839	2497133	7.8048	-	-	2497133	7.8048
Vinita Surana	IN30102220714362	763713	2.387	-	-	763713	2.387
Manish Surana	IN30021426739139	2	0.0000	-	-	2	0.0000
Manish Surana	IN30102221020636	2459410	7.6869	-	-	2459410	7.6869
Nivriti Samkit Jain	IN30102220976106	347500	1.0861	-	-	347500	1.0861
Rahul Surana	IN30102220976069	1404500	4.3897	-	-	1404500	4.3897
Shresha Surana	IN30021426780585	302916	0.9468	-	-	302916	0.9468
Sresha Surana	IN30102220977233	282000	0.8814	-	-	282000	0.8814
Mitali Surana	IN30102220975700	300000	0.9376	-	-	300000	0.9376
Advait Surana	1203070000210310	161541	0.5049	-	-	161541	0.5049
G M Surana (MHUF)	IN30102220975718	178775	0.5588	-	-	178775	0.5588
Narender Surana (HUF)	IN30102221451316	106500	0.3329	-	-	106500	0.3329
Devendra Surana (HUF)	IN30102221450735	67500	0.211	-	-	67500	0.211
G M Surana (HUF)	IN30102220975726	166380	0.52	-	-	166380	0.52
Bhagyanagar Securities Pvt Limited	1203070000101364	49000	0.1531	-	-	49000	0.1531
Surana Infocom Private Limited	1203070000102957	371576	1.1614	-	-	371576	1.1614
Surana Telecom and Power Limited	1203070000102976	1143736	3.5747	-	-	1143736	3.5747
Surana Infocom Private Limited	IN30102221457959	3970771	12.4106	-	-	3970771	12.4106

Note: None of the Acquirers, its related entities, Promoter and Promoter Group have dealt (buying, selling and dealing) in the equity shares of the Company during the period from 25th April, 2020 till 24th April, 2022 either on stock exchanges or through off-market.

**RAKHI
AGARWAL**

Digitally signed by RAKHI AGARWAL
DN: cn=Rakhi, o=Personnel,
ou=HR, ou=000002,
st=TELANGANA,
serialNumber=30807650522a558
c=IN, email=arakhi@rakhi.com
9273c18e0931d9d936, cn=RAKHI
AGARWAL
Date: 2022.04.24 16:32:48 +05'30'

Annexure III

Details of buying, selling and dealing in the equity shares of the Company by the Top 25 public shareholders during the period from 25th April, 2020 till 24th April, 2022

Sr. No.	Folio Nos / DP ID & Client ID	Name of Shareholder	Shareholding as on 25 th April, 2020		Variation		Shareholding as on 24 th April, 2022	
			No. of Shares	%age	Bought	Sold	No. of shares	%age
1	IN30021427036193	Sambhav Munoth	823000	2.57	-	46311	776689	2.43
2	IN30021426695803	Narender Munoth	354878	1.11	3901	-	358779	1.12
3	IN30021426089554	Kotak Securities Limited	0	0.00	279814	-	279814	0.87
	IN30021410000070	Kotak Securities Limited	0					
4	1205290000008736	Arun Kumar Jain	279165	0.87	-	-	279165	0.87
5	IN30081210000029	General Insurance Corporation of India	272709	0.85	-	-	272709	0.85
6	IN30021414284030	Vaibhav Mutha	257500	0.80	-	-	257500	0.80
	IN30051310887718	Vaibhav Mutha						
7	IN30160412620747	Vinod Chand Bothra	112055	0.35	91207	-	203262	0.64
8	IN30096610000004	Globe Capital Market Ltd	18687	0.06	151200	-	169887	0.53
	IN30096610000088	Globe Capital Market Limited						
9	IN30021426726241	Vijaykumar	0	0.00	150000	-	150000	0.47
10	IN30021426762053	Vinod Chand Bothra HUF	124088	0.39	23565	-	147653	0.46
11	IN30021426795760	Uday Pilani Sudhir	0	0.00	142377	-	142377	0.44
12	1205780000021187	Narayan Procon Private Limited	0	0.00	121254	-	121254	0.38
13	IN30021426789259	Akchhat Bothra	31454	0.10	84178	-	115632	0.36
14	IN30210510000204	Somani Stock Broking Pvt. Ltd.	0	0.00	107532	-	107532	0.34
15	IN30302868165026	Vijayalaxmi Boorugu	0	0.00	105809	-	105809	0.33
16	IN30290240110873	Dundoo Ajit Kumar	94050	0.29	10913	-	104963	0.33
17	1202060000799335	Aman Finvest Pvt Ltd	0	0.00	99512	-	99512	0.31
18	IN30021426703990	Anant Bothra	19875	0.06	72826	-	92701	0.29
19	IN30102210488149	Andhra Pradesh Industrial Development Corporation Limited	88350	0.28	-	-	88350	0.28
20	1202060000398323	Jindal Securities Pvt Ltd	0	0.00	82979	-	82979	0.26
21	1203330000810750	Shweta Goenka	0	0.00	68828	-	68828	0.22
22	IN30226914532872	Ashok Kumar Lakhotia	61278	0.19	-	11278	50000	0.16
23	IN30021426793225	Haryana Conductors Private Ltd	0	0.00	48568	-	48568	0.15
24	1202060000799320	Ishvam Portfolio Private Limited	0	0.00	44578	-	44578	0.14
25	1205780000038321	Maa Kali Vinimay Private Limited	0	0.00	41500	-	41500	0.13

Note: The above table (Annexure III) showing the dealings in securities of the Company by top 25 public shareholders may also include the off-market transactions by them for the said period.



RECONCILIATION OF SHARE CAPITAL AUDIT REPORT

1	For Quarter Ended	31 ST DECEMBER, 2021						
2	ISIN	INE363W01018						
3	Face Value	Rs. 2/- per share						
4	Name of the Company	BHAGYANAGAR PROPERTIES LIMITED						
5	Registered office Address	Sy.no.221 to 224 Part, Vattinagulapally, Rajendranagar Mandal, Ranga Reddy District, Hyderabad-500032.						
6	Correspondence Address	5 th Floor, Surya Towers, Sardar Patel Road, Secunderabad-500003						
7	Telephone & Fax Nos.	Tel: 040-44665757 / 58 Fax: 040-27818868/ 27848851						
8	Email Address	cs@surana.com						
9	Name of the Stock Exchanges where the company Securities are listed	1. BSE Ltd, Mumbai 2. National Stock Exchange of India Ltd, Mumbai						
10	Issued Capital	Number of Shares	% of total issued capital					
		3,19,95,000	100.00%					
11	Listed Capital As per the company records	Number of Shares	% of total Listed capital					
		3,19,95,000	100.00%					
12	Held in Dematerialized in CDSL	51,66,783	16.15%					
13	Held in Dematerialized in NSDL	2,64,86,386	82.78%					
14	Physical	3,41,831	1.07%					
15	Total Number of Shares (12+13+14)	3,19,95,000	100.00%					
16	Reasons for difference if any, between (10 & 11), (10&15), (11&15)	N/A						
17	Certifying the details of changed in share capital during the quarter under consideration as per the table below:							
		Particulars	No. of Shares	Applied/n ot applied for listing	Listed on Stock Exchange	Whether intimated to CDSL	Whether intimated to NSDL	In- Principal approval pending for stock exchange
		N/A	N/A	N/A	N/A	N/A	N/A	N/A

18	Register of Members updated	Yes		
19	Reference of previous quarter with regards to excess dematerialized shares, if any.	Nil		
20	Has the Company resolved the matter mentioned in Point No. 19 above in the current quarter? If Not, reasons why?	N/A		
21	Mentioned the total no. of requests, if any, confirmed after 21 days and the total no. of requests pending beyond 21 days with the reasons for delay: NO SUCH CASES			
	Total No. of demat requests	No. of requests	No. of Shares	Reasons for delay
	Confirmed after 21 days	Nil	Nil	N/A
	Pending for more than 21 days	Nil	Nil	N/A
22	Name, Telephone & Fax No, of the Compliance officer of the Company	<p>Ms. Sonal Jaju (<i>w.e.f. 01.10.2021</i>) Company Secretary & Compliance Officer 040-44665758, Fax: 040-27818868</p> <p>Mr. Vikram Singh Thakur (<i>upto 21.07.2021</i>) Company Secretary & Compliance Officer</p>		
23	Name, Address, Telephone & Fax No. and Registration No. of the Secretarial Auditor	<p>Mrs. Rakhi Agarwal 6-3-660, Flat 520, Block 4, Amrit Apartment, Kapadia Lane, Somajiguda, Hyderabad-500082. Tel. Mob: 9246530679</p>		
24	Appointment of common agency for Share Registry work	<p>KFin Technologies Private Limited Selenium Tower B, Plot Nos. 31 & 32, Gachibowli, Financial District, Nanakramguda, Serilingampally, Hyderabad - 500 032. Phone No: 040 - 67161526</p>		
25	Any other details that the Secretarial Auditor may like to provide	Nil		

Date: 10.01.2022
Place: Hyderabad

RAKHI
AGARWAL

Digitally signed by RAKHI
AGARWAL
DN: cn=RAKHI, o=Practising,
serial=00000000,
c=TELANGANA,
serialNumber=@1827553042b255
@07082323203245-470e4f465768
c=IN, email=00000000000000000000
AGARWAL
Date: 2022.01.10 15:42:13 +05'30'

RAKHI AGARWAL
Company Secretary in Practice
FCS No. 7047 C P No. 6270
UDIN: F007047C002114570



RECONCILIATION OF SHARE CAPITAL AUDIT REPORT

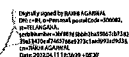
[(Pursuant to Regulation 76 of the SEBI (Depositories and Participants Regulations, 2018)]

1	For Quarter Ended	31 ST MARCH, 2022						
2	ISIN	INE363W01018						
3	Face Value	Rs. 2/- per share						
4	Name of the Company	BHAGYANAGAR PROPERTIES LIMITED						
5	Registered office Address	Sy.no.221 to 224 Part, Vattinagulapally, Rajendranagar Mandal, Ranga Reddy District, Hyderabad-500032.						
6	Correspondence Address	5 th Floor, Surya Towers, Sardar Patel Road, Secunderabad-500003						
7	Telephone & Fax Nos.	Tel: 040-44665757 / 58 Fax: 040-27818868/ 27848851						
8	Email Address	cs@surana.com						
9	Name of the Stock Exchanges where the company Securities are listed	1. BSE Ltd, Mumbai 2. National Stock Exchange of India Ltd, Mumbai						
10	Issued Capital	Number of Shares	% of total issued capital					
		3,19,95,000	100.00%					
11	Listed Capital As per the company records	Number of Shares	% of total Listed capital					
		3,19,95,000	100.00%					
12	Held in Dematerialized in CDSL	39,96,920	12.50%					
13	Held in Dematerialized in NSDL	2,76,58,013	86.44%					
14	Physical	3,40,067	1.06%					
15	Total Number of Shares (12+13+14)	3,19,95,000	100.00%					
16	Reasons for difference if any, between (10 & 11), (10&15), (11&15)	N/A						
17	Certifying the details of changed in share capital during the quarter under consideration as per the table below:							
		Particulars	No. of Shares	Applied/n ot applied for listing	Listed on Stock Exchange	Whether intimated to CDSL	Whether intimated to NSDL	In- Principal approval pending for stock exchange
		N/A	N/A	N/A	N/A	N/A	N/A	N/A

18	Register of Members updated	Yes		
19	Reference of previous quarter with regards to excess dematerialized shares, if any.	Nil		
20	Has the Company resolved the matter mentioned in Point No. 19 above in the current quarter? If Not, reasons why?	N/A		
21	Mentioned the total no. of requests, if any, confirmed after 21 days and the total no. of requests pending beyond 21 days with the reasons for delay: NO SUCH CASES			
	Total No. of demat requests	No. of requests	No. of Shares	Reasons for delay
	Confirmed after 21 days	Nil	Nil	N/A
	Pending for more than 21 days	Nil	Nil	N/A
22	Name, Telephone & Fax No, of the Compliance officer of the Company	Ms. Sonal Jaju Company Secretary & Compliance Officer 040-44665758, Fax: 040-27818868		
23	Name, Address, Telephone & Fax No. and Registration No. of the Secretarial Auditor	Mrs. Rakhi Agarwal 6-3-660, Flat 520, Block 4, Amrit Apartment, Kapadia Lane, Somajiguda, Hyderabad-500082. Tel. Mob: 9246530679		
24	Appointment of common agency for Share Registry work	KFin Technologies Limited Selenium Tower B, Plot Nos. 31 & 32, Gachibowli, Financial District, Nanakramguda, Serilingampally, Hyderabad - 500 032. Phone No: 040 - 67161526		
25	Any other details that the Secretarial Auditor may like to provide	Nil		

Date: 11.04.2022
Place: Hyderabad

RAKHI
AGARWAL



RAKHI AGARWAL
Company Secretary in Practice
FCS No. 7047 CP No. 6270
UDIN: F007047D000073102



RECONCILIATION OF SHARE CAPITAL AUDIT REPORT

[(Pursuant to Regulation 76 of the SEBI (Depositories and Participants Regulations, 2018)]

1	For the period	1 st April, 2022 to 24 th April, 2022					
2	ISIN	INE363W01018					
3	Face Value	Rs. 2/- per share					
4	Name of the Company	BHAGYANAGAR PROPERTIES LIMITED					
5	Registered office Address	Sy.no.221 to 224 Part, Vattinagulapally, Rajendranagar Mandal, Ranga Reddy District, Hyderabad-500032.					
6	Correspondence Address	5 th Floor, Surya Towers, Sardar Patel Road, Secunderabad-500003					
7	Telephone & Fax Nos.	Tel: 040-44665757 / 58 Fax: 040-27818868/ 27848851					
8	Email Address	cs@surana.com					
9	Name of the Stock Exchanges where the company Securities are listed	1. BSE Ltd, Mumbai 2. National Stock Exchange of India Ltd, Mumbai					
10	Issued Capital	Number of Shares	% of total issued capital				
		3,19,95,000	100.00%				
11	Listed Capital As per the company records	Number of Shares	% of total Listed capital				
		3,19,95,000	100.00%				
12	Held in Dematerialized in CDSL	40,32,656	12.60%				
13	Held in Dematerialized in NSDL	2,76,23,352	86.34%				
14	Physical	3,38,992	1.06%				
15	Total Number of Shares (12+13+14)	3,19,95,000	100.00%				
16	Reasons for difference if any, between (10 & 11), (10&15), (11&15)	N/A					
17	Certifying the details of changed in share capital during the quarter under consideration as per the table below:						
	Particulars	No. of Shares	Applied/not applied for listing	Listed on Stock Exchange	Whether intimated to CDSL	Whether intimated to NSDL	In- Principal approval pending for stock exchange
	N/A	N/A	N/A	N/A	N/A	N/A	N/A

