

CIN - L15140GJ1991PLC016151

"Ambuja Tower", Opp. Sindhu Bhavan, Sindhu Bhavan Road, Bodakdev, PO. Thaltej, Ahmedabad - 380059. India. Phone: 00-91-79-61556677 Fax: 00-91-79-61556678 Email: export@ambujagroup.com Visit us at: www.ambujagroup.com

Date: 14th June, 2017

To, Chief General Manager, Corporate Finance Department, Securities and Exchange Board of India, Plot No. C4-A, G Block, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051

Dear Sir/Madam,

Sub.: Request for informal guidance by way of "Interpretive Letter" under the provisions of SEBI (Informal Guidance) Scheme, 2003, ("Scheme") with regard to reclassification of promoter

Ref.: Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

We would like to submit following facts for your kind consideration and seek your guidance with respect to interpretation of Regulation 31A of Listing Regulations.

#### A. Background and Material Facts:

#### 1. Background of the Company:

Gujarat Ambuja Exports Limited ("GAEL" or "the Company") was incorporated on 21<sup>st</sup> August, 1991 under the Companies Act, 1956 as a Public Limited Company, having its registered office at Ahmedabad. The equity shares of the Company are listed on BSE Limited ("BSE") and The National Stock Exchange of India Limited ("NSE").

#### 2. Promoters and Promoter Group of the Company and their Shareholding:

The name of shareholders of the Company classified under the Promoters and Promoter Group category of the Company and their Shareholding as on 9<sup>th</sup> June, 2017 is as below:-

(Table 1)

Sr.	Name of the Promoter and	No. of Equity	% of Shareholding
No.	Promoter Group category	Shares held	
_ 1.	Vijaykumar Gupta	2,65,23,083	23.13%
2. •	Manish Gupta	3,75,85,230	32.78%
3.	Mohit Gupta	2,66,574	0.23%
4.	Sulochana Gupta	44,85,385	3.91%
5.	Shilpa Gupta	70,23,253	6.12%
	Total	7,58,83,525	66.18%





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The below mentioned person belonging to the Promoter Group of the Company has expressed his desire for reclassification from "Promoter Group category" to "Public category", details of whom is as below:

Sr. No.	37	(Table 2)	6
Sr. 190.	Name of the person	No. of Shares held	% of Shareholding
1.	Shri Mohit Gupta	2,66,574	0.23%

Shareholding of Shri Mohit Gupta comprises of very insignificant holding, constituting 0.23% of the total paid up equity capital of the Company.

Shri Mohit Gupta is son of Shri Vijaykumar Gupta and Smt. Sulochana Gupta and brother of Shri Manish Gupta. Shri Mohit Gupta, who is relative of Shri Vijaykumar Gupta, Smt. Sulochana Gupta and Shri Manish Gupta, is leading his life and occupation independently and not connected, directly or indirectly, whatsoever, with any activity of the Company.

Shri Mohit Gupta has been associated with the Company as Director since 2005. Thereafter, he was appointed as a Joint Managing Director of the Company in the year 2008. Further, Shri Mohit Gupta has resigned as Director (including Joint Managing Director) w.e.f. 31<sup>st</sup> May, 2017. Currently, Shri Mohit Gupta is neither involved in the operation of the Company nor connected with the Company. Further, Shri Mohit Gupta does not exercise any direct and indirect control over the affairs of the Company. The Company has also not entered into any Shareholder Agreement with him. Further, Shri Mohit Gupta hasn't got any Veto Rights or Special Rights as to voting power or control of the Company neither has any Special Information rights. He would also never be privy to any price sensitive information of the Company.

After the proposed reclassification, the following would be the promoters and promoter group of the Company and their shareholding in the Company:

Sr. No.	Name of the Promoter and Promoter Group category	No. of Equity Shares held	% of Shareholding
1.	Vijaykumar Gupta	2,65,23,083	23.13%
2.	Manish Gupta	3,75,85,230	32.78%
	Sulochana Gupta	44,85,385	3.91%
4.	Shilpa Gupta	70,23,253	6.12%
;	Total	7,56,16,951	65.94%





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4. However, clarity on the requirements of obtaining shareholders' approval for the reclassification is needed.

It is our understanding that, since the reclassification is not pursuant to sub-regulation (5) or (6) of the Regulation 31A of the Listing Regulations, approval of Shareholders is not required.

D. Based on the above, we seek your informal guidance as under:

In light of the above mentioned background, material facts, relevant regulatory provisions and submissions, we hereby request you to provide us an "Informal Guidance" as to whether the approval of the shareholders may be dispensed with as it is not required and the Company may approach the Stock Exchanges directly for permission under Regulation 31A (2) & (3) of Listing Regulations.

We are enclosing herewith a cheque no. 925894 dated 14<sup>th</sup> June, 2017 drawn on State Bank of India of ₹ 25,000/- (Rupees Twenty Five Thousand Only) in favour of Securities and Exchange Board of India, payable at Mumbai towards fees for obtaining informal guidance as specified under clause 6 (ii) of the Scheme.

We request you to treat this letter as a confidential pursuant to clause 11 of the Scheme for a period of 90 days from the date of the Departments' response.

In case you require any further information/documents, we shall be pleased to furnish you the same.

Your early response to our request will be highly appreciated.

Thanking you,

Yours Faithfully,

For, GUJARAT AMBUJA EXPORTS LIMITED

CHETNA DHARAJIYA COMPANY SECRETARY

Encl: As above and Shareholding Pattern (Annexure A) as on 31st March, 2017

**Contact Details** 

Email: cs@ambujagroup.com

Phone: 079-61556677



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"Ambuja Tower", Opp. Sindhu Bhavan, Sindhu Bhavan Road, Bodakdev, PO. Thaltej, Ahmedabad - 380059. India.

Place: Ahmedabad Date: 7th April, 2017

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Place : Ahmedabad		<u>p</u>	Note : a)	_		Alote .				_		2	_			9	7	E	T	T							_			_
pedabad	ASICT) 217 and out of bell 2,36,44.10 equity shares for other route (on proportionate bases) has bought back 2,38,44.10 equity shares of ₹ 2/- each through CDSL and hence issued, Subscribed and Paid-up 13,835,1975 equity shares of ₹ 2/- each to 11,48,97,695 equity shares of ₹ 2/- each through CDSL and hence issued, Subscribed and Paid-up Sizes and Paid-up shares for each at a price of ₹ 52/- (Rupees Ninety Pive only) pair equity shares of ₹ 2/- each to 11,48,97,695 equity shares of ₹ 2/- each to 11,	Capital of the Company reduced from 13,93,18,499 Equity Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the Sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each to 13 as x x one company under the Buy Back process the sub-Shares of ₹ 2/- each process the sub-Shares of ₹	Note: a) The Company under its Buy-Back Sohme through the party be disclosed in the respective columns to the extent information available.	(a) Wurt, the information pertaining to Depository Region in a modern holding more than 1% of total number of shares	(1) PAN would not be displayed on website of Stock Fyrance (2) The About 1997 (2) The Abo	(c) (1)+(c)(2)	Shareholding	Promoter - Mon	Total Non-	Regulations,	Employee Benefit)	(Share based	Benefit Trust (under SEBI	Employee	available)	Name of OR		IIN NO / members		1			3	1				•	anarenoiders	ath to supper
	of total 2,36 shares of 72) voting pet	any reduced	its Buy-Bac	be disclosed	d on websit		_		1					2		MI		2					3	1	_				_	_
	84,210 equity si each to 11,46,6 each gef Shareho	ST'E6'ET way	Schme through	name of all ho	of Stock Evolu		Φ_		_		· <u>0</u>			1			_						Gus							shareholders
	on Tender Offichares bought by 17,865 equity sh	open market u	A Million Mills	idens holding in			<u> </u>								0								S						Almba dr. march	Take in July
	r route (on prick, 1450 equitions of ₹ 2/- a	nderSbock-Ex resori₹2/-ea	De disclosed	ore than 1% o		e	<u>.                                    </u>	$\downarrow$			0				0				I				3		_			shares held	_	
	oportionate by shares in place.  We shares in place in pl	ch to 13 ga s	n the respect	of total number	-			-			<u>o_</u>				<u> </u>							100	3				Receipts		SALELIS	No. of
	we's Equity Shasis, has bought hysical form and	which closed on	ive columns to t	ar of sharee		0								e								(a)								Total nos
	was of ₹2/-a back 2,36,84, 2,36,82,760 a	(Sith January,	he extent info		_	8				0.000		_		0.000								[VIII]			(A+B+CZ)	% of	1957) As a	(Calculated	Digustance	
1	ach. 210 equity sh quity shares their one of	2008, had bo	mation avai			0						_		D				Class eg : X			2		1		_		<u>-c</u>	_	n Number o	12
Appendix 72	ares for cesh in demat mode	Idlit baok and	able											6				Class eg : Y			No of Voting Bloke								F Voting Right	
	exanguished s it a price of $\tau$ : were exangu					<b>.</b>				٥								ion i		Ĝ		(pg)							held in each	
pe Company p	)68,615 Equity 5 85/- (Rupees Ni letted, According					3	1			0,000			000	2	ŀ				Voting rights	of Total								Military on Assessed	a security of Young Rights held in each class of securities	
	hates of ₹ 2/-, haty Pive only) lly the issued, (					_							_ 0								3	S.		į	Warrants)	Secretifies	Outstanding	Underlying	1	
ESS of sacurity	nates of ₹ 2,1- each through CDSL and hence issued, Subscribed and Paid-up way Pive only) per equity share. The buykapit process was completed during ly the issued, Subscribed and Paid-up capital of the Company reduced from				000				0,000				0.000								(A+8+C2)	(x)+(litv) = (ixi)	capital)	becoming (98 a	convertible	conversion of				
	ist and hence . The buybad Paid-up caph			L	•				0			I								No. (a)	-	1						_		
•	Essued, Subs Cprocess was all of the Com			_	0.00			_	0.000			-	0.000	1				Shares	9	As a sk of	(lax)					r	shares	Number of Locked in		
	cribed and Pa	I			NA				NA				NA	-		_	-	held (b)	tota	j	ţiuxt tiuxt					wicumbered	pledged or otherwise	Number of Shares		
	Outr.					-	_	_						-				(b)	total Shares		_	_			0.		therwise	Shanna S		

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