

**Regd. Office:** City Pride Building, FF-107, Jalna Road,  
Mondha Naka, Dist. Aurangabad (MS) 431001  
☎ 0240-2351133, 9552533328, CIN:  
U45202MH2008PLC185168, Email:  
[info@machharinfra.com](mailto:info@machharinfra.com), website:www.machharind.com



**Ref No. MIL/2023-24/CS/82**

**Date:- 13<sup>th</sup> August, 2024**

To,  
The Manager,  
Listing Compliance Department,  
BSE Limited,  
P. J. Towers, Dalal Street,  
Mumbai - 400001  
[Date]

Subject: Late submission of Declaration under Regulation 31(4) of SEBI (SAST) Regulations, 2011 from the Promoters of the Compan

Ref:- Your email dated 13<sup>th</sup> August, 2024 to us.

Dear Sir/Madam,

We refer to your query dated 13<sup>th</sup> August, 2024 regarding the late submission of the declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, by the Promoters of Machhar Industries Limited. We acknowledge that the declaration, which was due with in seven days from the end of the financial year, was submitted on 13<sup>th</sup> May, 2024 to you.

The delay occurred due to confusion in the mind as, the members of promoter and Promoters Group, including Persons acting in concert, has not made any encumbrance of shares, directly or indirectly for the financial year ended March, 2024 as per regulation 31(4) so whether to file Nil encumbrance report or not. So, an inadvertently we missed to file and upload the No encumbrance disclosures within seven days to BSE website.

Sir, our company got listed in the year 2023 and its first year of compliance for us. We deeply regret this lapse and assure you that it was neither intentional nor a regular occurrence. The same fact has already been explained to BSE through our email dated 13<sup>th</sup> May, 2024 after completion of this regulations vide acknowledgment No. 72646445 of dated 13<sup>th</sup> May, 2024.



To prevent any such delays in the future, we have implemented one work sheet for the all mandatory disclosures in one excel sheet strengthening the internal controls, setting reminders, to ensure compliance.

We value the importance of timely compliance with all regulatory requirements and are committed to ensuring that such delays do not recur. We respectfully request your understanding in this matter and assure you of our ongoing commitment to full regulatory compliance. Please let us know if any further information or clarification is required from our end.

Thank you for your attention to this matter.

Yours sincerely,  
**For MACHHAR INDUSTRIES LIMITED**

**CS MAHESH DUBE**  
**COMPANY SECRETARY**  
**M. No. F-12866**

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website:www.machharind.com



**Ref No. MIL/2024-25/CS/15**

**Date:- 13<sup>th</sup> May, 2024**

**To,  
The Corporate Relations Department,  
BSE Limited,  
P. J. Towers,  
Dalal Street, Fort,  
Mumbai- 400 001**

**BSE Scrip Code: 543934**

Sub: Forwarding Copy of Disclosure made under Regulations 31(4) of SEBI (SAST) Regulations, 2011.

Ref:- you email to us for Non submission of Declaration under Regulation 31(4) of SEBI (SAST) Regulations, 2011 from the Promoters of the Company.

Dear Sir/ Madam,

We acknowledge our responsibility to adhere to the regulatory requirements and ensure timely compliance with all obligations. Unfortunately, due to as administrative oversight and technical issues, we encountered a delay in filing the required declaration. Besides, our company got listed since 11<sup>th</sup> July, 2023 and this is our first year of compliances for each regulations including annual disclosures.

We wish to assure you that we have taken immediate steps to rectify the situation. The necessary declaration has now been prepared and is being filed promptly with all requisite details accurately provided. We understand the importance of regulatory compliance and deeply regret any inconvenience caused due to this delay. As a company committed to transparency and adherence to regulatory standards, we are implementing measures to prevent similar occurrences in the future. This includes reinforcing internal controls, enhancing oversight mechanisms, and providing additional training to relevant personnel.

We appreciate your understanding and cooperation in this matter. Please do not hesitate to contact us if you require any further information or clarification regarding this issue. Pursuant to the provisions of Regulations 31(4) of SEBI (SAST) Regulations, 2011 Mr. Sandeep Machhar furnished disclosures as on 31<sup>st</sup> March, 2024 to the Target Company, on behalf of the Promoter Group. You are requested to kindly consider the same as

Thank you,  
**For MACHHAR INDUSTRIES LIMITED**

CS Mahesh Dube  
Company Secretary & Compliance Officer  
M. No. F-12866

Encl:- Copy of the discloser made under Regulation 31 (4) of SEBI (SAST) Regulations, 2011.

From,  
Mr. Sandeep Bhagwatiprasad Machhar,  
24, 40 Green Layout, Itkheda Paithan Road,  
Near Nath Valley School,  
Aurangabad – 431001  
Email:- [sandeepmachhar@gmail.com](mailto:sandeepmachhar@gmail.com)

**To,  
The Corporate Relations Department,  
BSE Limited,  
P. J. Towers,  
Dalal Street, Fort,  
Mumba- 400 001**

**To,  
The Company Secretary  
Machhar Industries Limited  
FF-107, City Pride Building,  
Jalna Road,  
Aurangabad - 431001**

Pursuant to the provisions of Regulations 31(4) of SEBI (Substantial Acquisition of shares and Takeovers) Regulations, 2011, we hereby declare that the members of promoter and Promoters Group, including Persons acting in concert, have not made any encumbrance of shares, directly or indirectly the financial year ended March, 2024.

Thank you,  
With Best Regards

**Mr. Sandeep Machhar  
Authorized Signatory  
On behalf of Promoter Group  
Machhar Industries Limited**

Date & Time of Download : 13/05/2024 12:44:05

**BSE ACKNOWLEDGEMENT**

<b>Acknowledgement Number</b>	7264645
<b>Date and Time of Submission</b>	5/13/2024 12:40:21 PM
<b>Scripcode and Company Name</b>	543934 - Machhar Industries Ltd
<b>Subject / Compliance Regulation</b>	Disclosure Made Under Regulations 31(4) Of SEBI (SAST) Regulations, 2011
<b>Submitted By</b>	Mahesh Dube
<b>Designation</b>	Company Secretary & Compliance Officer

**Disclaimer** : - Contents of filings has not been verified at the time of submission.

## Re: Non submission of Declaration under Regulation 31(4) of SEBI (SAST) Regulations, 2011 from the Promoters of the Company

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From: Mahesh Dube (csmaheshdube@yahoo.com)

To: corp.relations@bseindia.com

Cc: ashrotriya@machharinfra.com; info@machharinfra.com; query.lodr@bseindia.com

Date: Monday, May 13, 2024 at 12:50 PM GMT+5:30

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Dear Sir/ Madam,


We have received your email from query.lodr@bseindia.com and we acknowledge our responsibility to adhere to the regulatory requirements and ensure timely compliance with all obligations. Unfortunately, due to as administrative oversight and technical issues, we encountered a delay in filing the required declaration. We could not find ealrier the relevant tab for the filing hence uploade under general annoucement vide acknowledgement No. 7264645 on 13th may, 2024. Besides, our company got listed since 11<sup>th</sup> July, 2023 and this is our first year of compliances for each regulations including annual disclosures.


We wish to assure you that we have taken immediate steps to rectify the situation. The necessary declaration has now been prepared and is being filed promptly with all requisite details accurately provided. We understand the importance of regulatory compliance and deeply regret any inconvenience caused due to this delay. As a company committed to transparency and adherence to regulatory standards, we are implementing measures to prevent similar occurrences in the future. This includes reinforcing internal controls, enhancing oversight mechanisms, and providing additional training to relevant personnel.

We appreciate your understanding and cooperation in this matter. Please do not hesitate to contact us if you require any further information or clarification regarding this issue. Pursuant to the provisions of Regulations 31(4) of SEBI (SAST) Regulations, 2011 Mr. Sandeep Machhar furnished disclosures as on 31<sup>st</sup> March, 2024 to the Target Company, on behalf of the Promoter Group. You are requested to kindly consider the same as

On behalf of Machhar Industries Ltd

Mr. Mahesh Dube  
Company Secretary & compliance Officer  
Aurangabad  
Cont. 7588676788

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527kB

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1.9kB