

December 24, 2019

पौष- कृष्णपक्ष – त्रयोदशी

विक्रम सम्वत् २०७६

**National Stock Exchange of India Limited**  
"Exchange Plaza"  
Bandra – Kurla Complex,  
Bandra (E), Mumbai – 400 051  
**NSE Code: GHCL**

**BSE Limited**  
Corporate Relationship Department,  
1<sup>st</sup> Floor, New Trading Ring, Rotunda Building,  
P.J. Towers,  
Dalal Street, Fort, Mumbai – 400 001  
**BSE Code: 500171**

Dear Sir/Madam,

**Subject: Disclosure under Regulation 7(2) read with Regulation 6(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015**

Pursuant to provisions of Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 intimation be and is hereby given that based on benepos report dated 21-12-2019 received from Registrar of the company (i.e. Link Intime India Private Limited), we have observed that 4,00,000 equity shares of Golden Tobacco Limited was debited and credited in the name of Mr. Vinod Kumar Bindal. In order to sure about our observation, we referred the disclosure filed by Golden Tobacco Limited on July 30, 2019 regarding encumbrances of 4,00,000 equity shares and same was reported to Stock Exchanges.

We would like to informed that as per Regulation 7(2) of the SEBI (PIT) Regulations, 2015 every company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure **or from becoming aware of such information.**

We would like to invite your attention that we have not received disclosure from Golden Tobacco Limited for revocation of 4,00,000 equity shares. Hence, for the purpose of disclosure, we have taken closing price (i.e.192.15 per shares) of NSE dated 18-12-2019, which is expected trading date.

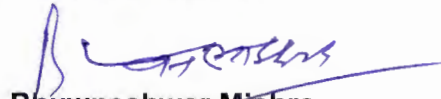
Copy of the disclosure required under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 is enclosed herewith.

You are requested to kindly take on record. In case you need any further information, please let us inform.

Thanking you

Yours faithfully

**For GHCL Limited**

A handwritten signature in blue ink, appearing to read 'Bhuneshwar Mishra', written over a blue horizontal line.

**Bhuneshwar Mishra**  
**Sr. General Manager & Company Secretary**

B- 38, GHCL House, Institutional Area, Sector- 1, Noida, (U.P.) - 201301, India. Ph. : +91-120-2535335, 4939900, Fax : +91-120-2535209  
CIN : L24100GJ1983PLC006513, E-mail : [ghclinfo@ghcl.co.in](mailto:ghclinfo@ghcl.co.in) , Website : [www.ghcl.co.in](http://www.ghcl.co.in)

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**Form C**  
**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
 [Regulation 7(2) read with Regulation 6(2)- Continual Disclosure]

Name of the Company: **GHCL Limited**  
 ISIN of the Company: **INE539A01019**

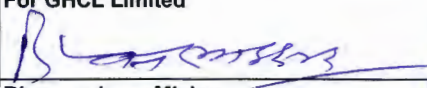
**Details of change in holding Securities of Promoter, Employee or Director of a listed company and other such person as mentioned in Regulation 6(2).**

Name, PAN No., CIN/DIN & Address of Promoter / employee / director with contact No.	Category of person (Promoters/ KMP/ Directors/Employees/ Immediate Relatives/ others etc.)	Securities held prior to acquisition / disposal		Securities acquired / Disposed				Securities held post acquisition / disposal		Date of allotment advise / acquisition of shares / sell of shares specify		Date of intimation to Company	Mode of Acquisition/ Disposal (on market /public/ rights/preferential offer/off market/ inter-se transfer, ESOPs etc.)
		Type of security (for e.g. Shares, warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (for e.g. Shares, warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/Sale/PI edge/revok e/Invoke)	Type of security (For eg. – Shares, Warrants, Convertible	No. and % of sharehold ing	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14
Golden Tobacco Limited, Promoter (PAN: AAACG1421A), Address : Darjipura, Post-Amaliyara, Vadodara-390022 Mobile: 9909942988	Promoter	Shares	416578 (0.42%)	Shares	4,00,000	Approx. Rs.7,68,60,000 /-	revoke*	Shares	16,578 (0.017%)	18-12-2019	18-12-2019	21-12-2019	Off Market

**Note:**\*Based on benepos report dated 21-12-2019, received from Link Intime India Private Limited (i.e. Registrar of the Company), we have observed that 4,00,000 equity shares of Golden Tobacco Limited was debited and credited in the name of Mr. Vinod Kumar Bindal. In order to sure about our observation, we referred the disclosure filed by Golden Tobacco Limited on July 30, 2019 regarding encumbrances of 4,00,000 equity shares and same was reported to Stock Exchanges. As per Regulation 7(2) of the SEBI (PIT) Regulations, 2015 every company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information. We would like to inform that we have not received disclosure from Golden Tobacco Limited for revocation of 4,00,000 equity shares. Hence, for the purpose of disclosure, we have taken closing price (i.e.192.15 per shares) of NSE dated 18-12-2019, which is expected trading date.

**Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).**

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of Contract	Contract Specifications	Buy		Sell		
		Notional value	Number of units(Contract* Lot size)	Notional value	Number of units(Contract* Lot size)	
15	16	17	18	19	20	21
N. A.	N. A.	N. A.	N. A.	N. A.	N. A.	Off Market

Name & Signature: **For GHCL Limited**  
  
 Designation: **Bhuweshwar Mishra Sr. General Manager & Company Secretary**  
 Date: 24-12-2019  
 Place: Noida

