

Date: 06/04/2023

**From:**

**Pradipkumar Ratilal Navik**  
11, Sugam Soc., Adajan Patiya,  
Rander Road, Surat- 395009  
Gujarat, India.

To <b>BSE Limited</b> Phiroze Jeejeebhoy Towers Dalal Street Mumbai- 400001	To The Compliance Officer <b>ZEAL AQUA LIMITED,</b> Block No. 347 Vill. Orma, Ta: Olpad, Surat,Gujarat-394540, India	To The Audit Committee <b>ZEAL AQUA LIMITED,</b> Block No. 347 Vill. Orma, Ta: Olpad, Surat,Gujarat- 394540, India
---	---	---

Dear Sir / Madam,

**Sub: Annual Disclosures under Regulation 31(4) of SEBI (SAST) Regulations, 2011 of Zeal Aqua Limited (Scrip Code: 539963) for the year ended on March, 31<sup>st</sup> 2023.**

Pursuant to provisions of Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I, on behalf of all the Promoters and Promoter Group, hereby declare that none of the person belonging to promoter along with the persons acting in concern have made any encumbrance, directly or indirectly, of any shares held by us in the company (**Zeal Aqua Limited /Scrip Code: 539963**) during the Financial year 2022-2023.

Kindly take the same on records and acknowledge.

Thanking You,  
Yours Faithfully,

**Pradipkumar Ratilal Navik**  
Whole Time Director and Promoter  
DIN: 01067716

**Disclosures under Regulation 31 (4) of SEBI  
(Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**List of Promoter(s) / Members of the Promoter Group and PAC with him  
(As on March 31, 2023)**

**Name of the Target Company: Zeal Aqua Limited (Scrip Code: 539963)**

<b>Name(s) of the person and Persons Acting in Concert (PAC) with the person.</b>	<b>Whether the person belongs to Promoter/Promoter group</b>	<b>PAN of the person and PACs</b>	<b>Number of shares</b>	<b>% w.r.t. total share/voting capital wherever applicable</b>
Pradeepkumar Ratilal Navik	Promoter	AARPN1990M	1,24,65,600	9.89
Shantilal Ishwarlal Patel	Promoter	ACIPP2469A	1,34,35,200	10.66
Susanben Pradeep Navik	Promoter Group	AAXPN5858L	1,39,10,400	11.03
Rohan Pradipkumar Navik	Promoter Group	AECPN3901P	14,44,800	1.15
Rashmi Shantilal Patel	Promoter Group	AQVPP6587C	1,24,70,400	9.89
Kimi Rohan Navik	Promoter Group	AQVPP6747J	9,60,000	0.76
Dhavalkumar Shantilal Patel	Promoter Group	BDVPP1398H	4,80,000	0.38
Rama Patel	Promoter Group	-	0	0.00
Preety Mistry	Promoter Group	APGPM3552G	0	0.00
Rami Patel	Promoter Group	-	0	0.00
Dharmen Bhagwakar	Promoter Group	-	0	0.00
Niru Patel	Promoter Group	-	0	0.00
Usha Patel	Promoter Group	-	0	0.00
Pradipkumar Navik HUF	Promoter Group	AAOHP4795B	0	0.00

Shantilal I Patel HUF	Promoter Group	ABAHS7872M	0	0.00
Rohan P Navik HUF	Promoter Group	AASHR0728Q	0	0.00
Dhaval S Patel HUF	Promoter Group	AAJHD6683F	0	0.00
Gold Pink Aquaculture Private Limited	Promoter Group	AACCG9750C	24,00,000	1.90
Navik Aqua Private Limited	Promoter Group	AACCN1505C	24,00,000	1.90
Rati Aqua Private Limited	Promoter Group	AAFRCR1888K	38,68,800	3.07
Susan Aqua Private Limited	Promoter Group	AAPCS4990R	24,00,000	1.90
Agave Tradecom LLP	Promoter Group	ABCFA2203N	2,00,16,000	15.88
Jacob Foods Private Limited	Promoter Group	AAACJ9554D	0	0.00
Mukesh Hotels Private Limited	Promoter Group	AAGCM1172N	0	0.00
Bright Commotrade LLP	Promoter Group	AAPFB6921J	0	0.00
Agni Aqua Farm	Promoter Group	AAOFA8292N	0	0.00
Akash Aqua Farm	Promoter Group	AAOFA8293P	0	0.00
Dhaval Aqua Farm	Promoter Group	AAFFD9982P	0	0.00
Jal Aqua Farm	Promoter Group	AAGFJ2657L	0	0.00
Pruthvi Aqua Farm	Promoter Group	AAKFP0828K	0	0.00
Deep Aqua Farm	Promoter Group	AAGFD8438H	0	0.00
Dinkar Aqua Farm	Promoter Group	AAGFD7899E	0	0.00
Divya Aqua Farm	Promoter Group	AAGFD7897L	0	0.00

Darshan Aqua Farm	Promoter Group	AAGFD7898F	0	0.00
Preety Aqua Farm	Promoter Group	AAJFP7755N	0	0.00
Dilip Aqua Farm	Promoter Group	AAGFD7900G	0	0.00
Kimi Aqua Farm	Promoter Group	AAIFK9295K	0	0.00
Rohan Aqua Farm	Promoter Group	AAHFR1049K	0	0.00
S R Aqua Farm	Promoter Group	ABAFS6098M	0	0.00
Vayu Aqua Farm	Promoter Group	AAGFV7964G	0	0.00
Tapi Aqua Farm	Promoter Group	AADFT2480Q	0	0.00

**On Behalf of Promoter & Promoters Group**

**Pradipkumar Ratilal Navik**  
**Whole Time Director and Promoter**  
DIN: 01067716

Place: Surat  
Date: 06/04/2023