

# BHATKAWA TEA INDUSTRIES LIMITED

Trusted Certified Company | CIN : L01132WB1911PLC002077

BK/CSE

Date: 17/10/2023

To

The Calcutta Stock Exchange Limited,

7, Lyons Range,

Kolkata – 700 001

Dear Sirs/ Ma'am,

**Re: Scrip No. 12018**

**Sub: Disclosure of Reg 32(1) - Document for variations in utilization of issue proceeds**

Pursuant to the provision of Regulation 32(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 regarding the Statement of deviation or variation in public issue, rights issue, preferential issue etc., we would like to inform that the said Regulation 32(1) is not applicable for the Company as there is no offer made or funds raised by way of Public Issue, Right Issue, Preferential Issue etc. during the Quarter ended 30.09.2023 and hence the Statement not submitted.

Thanking you.

Yours faithfully,

**For Bhatkawa Tea Industries Limited**

*Dharini Mehta*



**Dharini Mehta**

**Company secretary & Compliance officer**



**CERTIFICATE UNDER REGULATION 40 (9) OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 FOR THE PERIOD ENDING ON 30<sup>th</sup> SEPTEMBER 2023**

The Securities and Exchange Board of India (SEBI) vide gazette notification dated 8<sup>th</sup> June 2018 and vide its press release dated 3<sup>rd</sup> December 2018, amended Regulation 40 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 and has mandated to transfer securities in dematerialized form w.e.f 1<sup>st</sup> April 2019.

SEBI vide gazette notification dated 24<sup>th</sup> January, 2022 read with SEBI circular no. SEBI/HO/MIRSD/MIRSD\_RTAMB/P/CIR/2022/8 dated 25<sup>th</sup> January 2022 has mandated that the companies shall effect issuance of certificates of receipts or advices, as applicable in dematerialized form only, while processing the service requests relating to Issue of duplicate securities certificate, Claim from Unclaimed Suspense Account, Renewal /Exchange of securities certificate, Endorsement, Sub division /Splitting of securities certificate, Consolidation of Securities certificates /folios, Transmission and Transposition.

Accordingly, on the basis of examination of the relevant documents relating to **M/s. BHATKAWA TEA INDUSTRIES LIMITED** (CIN - L01132WB1911PLC002077) maintained by M/s. S. K. Infosolutions Pvt. Ltd., Registrar and Share Transfer Agents (RTA) at D/42, Katju Nagar, Kolkata – 700 032, pertaining to transfer of equity shares of the Company for the period from 1<sup>ST</sup> April 2023 to 30<sup>th</sup> September 2023 for the purpose of issuing a Certificate as per Regulation 40(9) of the SEBI (LODR) Regulations, 2015. I hereby certify that during the half year ended on 30<sup>th</sup> September 2023:

- A) Share Certificate(s) relating to the Share Transfer form(s) received during the period from 1<sup>ST</sup> April 2023 to 30<sup>th</sup> September 2023 as entered in the Memorandum of Transfers have been issued within thirty days from the respective date of lodgement of each form excepting those rejected on technical grounds.
- B) Share Certificate(s) in respect of requests for exchange of duplicate and split certificates have been issued within thirty days of lodgement of request, complete in all respect.
- C) The Company has not received any request for issue of right/bonus/public/preferential issue or conversion/sub division, consolidation, duplicate, replacement, renewal, exchange, split or endorsement of calls, /allotment monies/remat of shares.

**For SB Sheth & Associates**

SHIKSHA BHAVIK SHETH

**Shiksha Bhavik Sheth**

**Practising Company Secretary**

**M No -A28387**

**C. P. No-15781**

**Peer Review Certificate No – 2454/2022**

**UDIN- A028387E001364436**

**Date : 18.10.2023**

# BHATKAWA TEA INDUSTRIES LIMITED

Trusted Certified Company | CIN : L01132WB1911PLC002077

BK/CSE

Date: 17<sup>th</sup> October, 2023

To

The Calcutta Stock Exchange Limited,  
7, Lyons Range,  
Kolkata – 700 001

Dear Sirs/ Ma'am,

**Re: Scrip No. 12018**

Pursuant to the provisions of Regulation 29 and 33(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, notice is hereby given that a meeting of the Board of Directors of the Company is scheduled to be held on Thursday, 9<sup>th</sup> November, 2023 at the Registered Office of the Company at 11.00 a.m to consider inter-alia, the unaudited financial results of the Company for quarter ended 30<sup>th</sup> September, 2023.

Kindly take necessary action and oblige.

Thanking you.

Yours faithfully,

**For Bhatkawa Tea Industries Limited**

*Dharini Mehta*



**Dharini Mehta**

**Company Secretary & Compliance officer**

# BHATKAWA TEA INDUSTRIES LIMITED

Trusted Certified Company | CIN : L01132WB1911PLC002077

BK/CSE

17<sup>th</sup> October, 2023

To

The Calcutta Stock Exchange Limited,

7, Lyons Range,

Kolkata – 700 001

Dear Sirs/ Ma'am,

**Re: Scrip No. 12018**

**Sub: Disclosure of Reg 13(1)**

This is to certify that we have received complaint letters from the shareholders for the period ended 30.09.2023 and the same has been disposed of.

The details of the complaints are below which is mentioned in the Statement of Investor complaints as per Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 –

Sl. No	Particulars	No. of complaints
1	Number of Investor complaints pending at the beginning of the year	0
2	Number of Investor Complaints received during the year	1
3	Number of Investor Complaints disposed of during the year	1
4	Number of Investor Complaints remaining unresolved at the end of the year	0

Thanking you.

Yours faithfully,

*Dharini Mehta*



**Dharini Mehta**  
**Company secretary**

# BHATKAWA TEA INDUSTRIES LIMITED

Trusted Certified Company | CIN : L01132WB1911PLC002077

BK/CSE

17<sup>th</sup> October, 2023

To

The Calcutta Stock Exchange Limited,  
7, Lyons Range,  
Kolkata – 700 001

Dear Sirs/ Ma'am,

**Re: Scrip No. 12018**

**Sub: Disclosure of Reg 13(3) – Statement of Investor complaints**

Please find below a statement of investor complaints for the year quarter ended 30.09.2023 pursuant to compliance under Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 –

Sl. No	Particulars	No. of complaints
1	Number of Investor complaints pending at the beginning of the year	0
2	Number of Investor Complaints received during the year	1
3	Number of Investor Complaints disposed of during the year	1
4	Number of Investor Complaints remaining unresolved at the end of the year	0

Thanking you.

Yours faithfully,

**For Bhatkawa Tea Industries Limited**

*Dharini Mehta*



**Dharini Mehta**

**Company Secretary & Compliance officer**

"NICCO HOUSE," 6TH FLOOR, 2, HARE STREET, KOLKATA-700 001  
TELE : 91 33 2248 9916/5422/5431, FAX : 91 33 2248 5362  
e-mail : [contact@bhatkawa.com](mailto:contact@bhatkawa.com)  
Website : [www.bhatkawatea.com](http://www.bhatkawatea.com)

**Reg 23(9) - Disclosure of related party transactions on consolidated basis for half yearly ended 30<sup>th</sup> September, 2023**

Details of the party (listed entity /subsidiary) entering into the transaction

Name Bhatkawa Tea Industries Ltd

PAN AABCB3341D

Bhatkawa Tea Industries Ltd										Additional disclosure of related party transactions - applicable only in case the related party transaction relates to loans, inter-corporate deposits, advances or investments made or given by the listed entity/subsidiary. These details need to be disclosed only once, during the reporting period when such transaction was undertaken.						
S. No	Details of the counterparty			Type of related party transaction	Value of the related party transaction as approved by the audit committee	Value of transaction during the reporting period	In case monies are due to either party as a result of the transaction		In case any financial indebtedness is incurred to make or give loans, inter-corporate deposits, advances or investments			Details of the loans, inter-corporate deposits, advances or investments				
	Name	PAN	Relationship of the counterparty with the listed entity or its subsidiary				Opening balance	Closing balance	Nature of indebtedness (loan/ issuance of debt/ any other etc.)	Cost	Tenure	Nature (loan/ advance/ inter-corporate deposit/ investment)	Interest Rate (%)	Tenure	Secured/ unsecured	Purpose for which the funds will be utilised by the ultimate recipient of funds (end-use)
1	Mr. Padmanabh Jalan	AFWPJ0680C	Executive Director	Remuneration Paid	20,49,600	20,49,600	2,80,000	2,80,000	-	-	-	-	-	-	-	-
2	Mr. Krishnendu Basu	ADPPB2133D	Chief Financial Officer	Remuneration Paid	2,52,000	2,52,000	24,000	25,000	-	-	-	-	-	-	-	-

3	Mrs. Dharini Mehta	AMWPD 3663N	Company Secretary	Remuneration Paid	1,06,200	1,06,200	-	-	-	-	-	-	-	-	-	-
4	Mr. Sudarshan Jalan	ACXPJ3 756F	Relative of KMP	Remuneration Paid	9,07,200	9,07,200	1,35,000	1,35,000	-	-	-	-	-	-	-	-
5	Mrs. Siddhika Jalan	AILPA78 35J	Relative of KMP	Remuneration Paid	1,51,200	1,51,200	21,750	21,500	-	-	-	-	-	-	-	-
6	M/s Pahargoomiah Tea Industries Pvt. Ltd.	AAACU5 506Q	Significant Influence by KMP or their relatives	Purchases	2,58,400	2,58,400	-	-								
7	M/s Uphaar Financial Services Pvt. Ltd.	AAACU6 308A	Significant Influence by KMP or their relatives	Purchases	24,32,711	24,32,711	-	-								
8	M/s Kriti Industries Co. Ltd.	AACCK1 846P	Significant Influence by KMP or their relatives	Reimburse ment of Expenses	54,100	54,100	-	-								
9	M/s Uphaar Financial Services Pvt. Ltd.	AAACU6 308A	Significant Influence by KMP or their relatives	Sales	2,08,000	2,08,000										
10	M/s Kriti Industries Co. Ltd.	AACCK1 846P	Significant Influence by KMP or their relatives	Rent & Service Charge Paid	7,20,000	7,20,000										
11	M/s. Lake View Dealers Pvt. Ltd.		Significant Influence by KMP or their relatives	Interest Income	8,78,630	8,78,630		8,78,630								
12	Mr. Padmanabh Jalan	AFWPJ0 680C	Executive Director	Security Deposit	-	-	1,500	1,500	-	-	-	-	-	-	-	-
13	M/s Kriti Industries Co. Ltd.	AACCK1 846P	Significant Influence by KMP or their relatives	Security Deposit	-	-	6,00,000	6,00,000	-	-	-	-	-	-	-	-
To tal					80,18,041	80,18,041										

For Bhatkawa Tea Industries Limited

*Dharini Mehta*

**Dharini Mehta**  
**Company secretary & Compliance officer**  
**Dated: 20/10/2023**



# REPORT ON CORPORATE GOVERNANCE ON QUARTERLY BASIS FOR 30.09.2023

1. Name of Listed Entity - Bhatkawa Tea Industries Ltd

2. Quarter ending – 30<sup>th</sup> September, 2023

## I. Composition of Board of Directors

Title (Mr/ Ms)	Name of the Director	PAN & DIN	Category (Chairperson/Executive/ Non-Executive/ independent / Nominee)	Special Resolution passed and Date of SR	Initial Date of Appointment	Date/ of Reappointment	Date of Cessation	Date of Birth	No. Of directors hip in listed entities including this listed entity	No of Independent Directorsh ip in listed entities including this listed entity	Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity	No of post of Chairpers on in Audit/ Stakeholder Committee held in listed entities including this listed entity
Mr.	Padmanabh Jalan	AFWPJ0680C /01651268	Wholetime Director	Yes 28/09/2020	31/07/2009	01/04/2020	-	17/02/1987	2	0	2	0
Mrs.	Rashmi Chitlangia	ADSPC8231G /07171476	Non-Executive Independent Woman Director	Yes 28/09/2015	15/05/2015	28/09/2015	-	26/06/1966	2	2	2	1
Mr.	Krishna Prasad Bagaria	ADZPB4942N /00938163	Non – Executive Independent Director	Yes 20/09/2021	13/11/2020	20/09/2021	-	24/05/1960	3	1	1	1
Mr.	Arjun Mitra	AEWPM8300F /06969237	Non – Executive Independent Director	No	16/12/2022	-	-	03/11/1962	1	1	2	0

- Whether Regular chairperson appointed – Yes

- Whether Chairperson is related to managing director or CEO - No

## II. Composition of Committees

Name of Committee	Whether Regular chairperson appointed	Name of Committee members	DIN	Category (Chairperson/Executive/Non-Executive/independent/Nominee)	Date of Appointment	Date of Cessation
1. Audit Committee	Yes	Mr. Padmanabh Jalan	01651268	Executive	14-11-2009	-
		Mrs. Rashmi Chitlangia	07171476	Chairperson, Non- Executive, Independent	14-11-2015	-
		Mr. Krishna Prasad Bagaria	00938163	Non- Executive Independent	04-05-2021	
2. Nomination & Remuneration Committee	Yes	Mrs. Rashmi Chitlangia	07171476	Chairperson, Non- Executive, Independent	14-11-2015	-
		Mr. Krishna Prasad Bagaria	00938163	Non- Executive Independent	04-05-2021	
		Mr. Arjun Mitra	06969237	Non- Executive Independent	28-12-2022	
3. Stakeholders Relationship Committee'	Yes	Mrs. Rashmi Chitlangia	07171476	Chairperson, Non- Executive, Independent	14-11-2015	-
		Mr. Padmanabh Jalan	01651268	Executive	14-11-2009	-
		Mr. Arjun Mitra	06969237	Non- Executive Independent	28-12-2022	

**III. Meeting of Board of Directors**

an Meeting of Board of Directors

Date(s) of Meeting (if any) in the previous quarter	Date(s) of Meeting (if any) in the relevant quarter	Whether requirement of Quorum met*	Number of Directors present*	Number of independent directors present*	Maximum gap between any two consecutive (in number of days)
29/05/2023	12/08/2023	Yes	4	3	

**IV. Meetings of Committees**

Date(s) of Meeting (if any) in the relevant quarter	Whether requirement of Quorum met*	Number of Directors present*	Number of independent directors present*	Date(s) of Meeting (if any) in the previous quarter	Maximum gap between any two consecutive (in number of days)
Audit Committee					
12/08/2023	Yes	3	2	29/05/2023	74
Nomination & Remuneration Committee					
12/08/2023	Yes	3	3	10/02/2023	182
* This information has to be mandatorily be given for audit committee, for rest of the committees giving this information is optional					
**to be filled in only for the current quarter meetings					

**V. Related Party Transactions**

Subject	Compliance status (Yes/No/NA)
	refer note below
Whether prior approval of audit committee obtained	Yes
Whether shareholder approval obtained for material RPT	NA
Whether details of RPT entered into pursuant to omnibus approval have been reviewed by the Audit Committee	Yes
Note: 1 In the column "Compliance Status", compliance or non-compliance may be indicated by Yes/No/N.A.. For example, if the Board has been composed in accordance with the requirements of Listing Regulations, "Yes" may be indicated. Similarly, in case the Listed Entity has no related party transactions, the words "N.A." may be indicated. 2 If status is "No" details of non-compliance may be given here.	

**VI. Affirmations**

1. The composition of Board of Directors is in terms of SEBI (Listing Obligations and Disclosure requirements) Regulations, 2015.	Yes
2. The composition of the following committees is in terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	
a. Audit Committee	Yes
b. Nomination & Remuneration Committee	Yes
c. Stakeholders Relationship Committee	Yes
d. Risk management committee (applicable to the top 500 listed entities)	NA
3. The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	Yes
4. The meetings of the board of directors and the above committees have been conducted in the manner as specified in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Yes
5. This report and/or the report submitted in the previous quarter has been placed before Board of Directors. Any comments/observations/advice of the board of directors may be mentioned here.	Yes

**For Bhatkawa Tea Industries Limited**


**Dharini Mehta**  
**Company secretary & Compliance officer**  
**Dated: 17/10/2023**



## Corporate Governance Report for the Half Financial Year ended 30.09.2023

### Affirmations

Broad heading	Regulation Number	Compliance status (Yes/No/NA)
Copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report, business responsibility report displayed on website	46(2)	Yes
Presence of Chairperson of Audit Committee at the Annual General Meeting	18(1)(d)	Yes
Presence of Chairperson of the nomination and remuneration committee at the annual general meeting	19(3)	Yes
Presence of Chairperson of the Stakeholder Relationship committee at the annual general meeting	20(3)	Yes
Whether "Corporate Governance Report" disclosed in Annual Report	34(3) read with para C of Schedule V	Yes

For Bhatkawa Tea Industries Limited

*Dharini Mehta*

**Dharini Mehta**  
Company secretary & Compliance officer



## Corporate Governance Report for the Half Financial Year ended 30.09.2023

Half year ending – 30<sup>th</sup> Sept, 2023

### I. Disclosure of Loans / guarantees / comfort letters / securities etc.refer note below

(A) Any loan or any other form of debt advanced by the listed entity directly or indirectly to:		
Entity	Aggregate amount advanced during six months	Balance outstanding at the end of six months
Promoter or any other entity controlled by them	-	-
Promoter Group or any other entity controlled by them	-	-
Directors (including relatives) or any other entity controlled by them	-	-
KMPs or any other entity controlled by them	-	-

(B) Any guarantee/ comfort letter (by whatever name called) provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:			
Entity	Type (guarantee, comfort letter etc.)	Aggregate amount of issuance during six months	Balance outstanding at the end of six months (taking into account any invocation)
Promoter or any other entity controlled by them	-	-	-
Promoter Group or any other entity controlled by them	-	-	-
Directors (including relatives) or any other entity controlled by them	-	-	-
KMPs or any other entity controlled by them	-	-	-

(C) Any security provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by			
Entity	Type of security (cash, shares etc.)	Aggregate value of security provided during six months	Balance outstanding at the end of six months
Promoter or any other entity controlled by them	-	-	-
Promoter Group or any other entity controlled by them	-	-	-
Directors (including relatives) or any other entity controlled by them	-	-	-
KMPs or any other entity controlled by them	-	-	-

## II. Affirmations:

All loans (or other form of debt), guarantees, comfort letters (by whatever name called) or securities in connection with any loan(s) (or other form of debt) given directly or indirectly by the listed entity to promoter(s), promoter group, director(s) (including their relatives), key managerial personnel (including their relatives) or any entity controlled by them are in the economic interest of the company.

**For Bhatkawa Tea Industries Limited**



**Dharini Mehta**  
**Company secretary & Compliance officer**  
**Dated: 17/10/2023**



1. Name of Listed Entity: **:BHATKAWA TEA INDUSTRIES LIMITED**
2. Scrip Code/Name of Scrip/Class of Security : **of Rs.10/- each.**
3. Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c) : **Reg. 31(1)(b)**
  - a. If under 31(1)(b) then indicate the report for Quarter ended : **30.09.2023**
  - b. If under 31(1)(c) then indicate date of allotment/extinguishment : Not Applicable

4. **Declaration:** The Listed entity is required to submit the following declaration to the extent of submission of information:-

	Particulars	Yes*	No*
1	Whether the Listed Entity has issued any partly paid up shares?	-	NO
2	Whether the Listed Entity has issued any Convertible Securities or Warrants?	-	NO
3	Whether the Listed Entity has any shares against which depository receipts are issued?	-	NO
4	Whether the Listed Entity has any shares in locked-in?	-	NO
5	Whether any shares held by promoters are pledge or otherwise encumbered?	-	NO

\* If the Listed Entity selects the option 'No' for the questions above, the columns for the partly paid up shares, Outstanding Convertible Securities/Warrants, depository receipts, Locked-in-shares, no. of shares pledged or otherwise encumbered by promoters, as applicable, shall not be displayed at the time of dissemination on the Stock Exchange website. Also wherever there is 'No' declared by Listed Entity in above table the values will be considered as 'Zero' by default on submission of the format of holding of specified securities.

**Table I - Summary Statement holding of specified securities**

Category (I)	Category of shareholder (II)	Nos. of shareh olders (III)	No. of fully paid up equity share s held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held VII= IV+V+VI	Shareholding as a % total no. of shares (calculate d as per SCRR, 1957) (VIII) As a % of (A+B+C2) As a % of (A+B+C2) VIII	Number of Voting Rights held in each class of securities (IX)			No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Total shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)=(VII)+(X ) as a % of (A+B+C2) (XI)	Number of Locked in shares ** (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerializ ed form (XIV)	
								No of Voting Rights					Total as a % of (A+B+ C)	No. (a)	As a % of total Shar es held (b)	No. (a)		As a % of total Share s held (b)
								Class: X*	Class Y	Total								
(A)	Promoter & Promoter Group	5	1362786	0	0	1362786	60.84	1362786	0	1362786	60.84	0	0	0.00	0	0	1362786	
(B)	Public	204	877214	0	0	877214	39.16	877214	0	877214	39.16	0	0	0	0	0	756291	
(C)	Non Promoter- Non Public	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0	0	
(C1)	Shares underlying DRs	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0	0	
(C2)	Shares held by Employee Trusts	0	0	0	0	0	0	0	0	0	0.00	0	0	0	0	0	0	
	Total	209	2240000	0	0	2240000	100.00	2240000	0	2240000	100.00	0	0	0.00	0	0	2119077	

\*Voting rights for the ordinary shares have been declared in class X

**(II) Statement showing Shareholding Pattern of the Promoter and Promoter Group**

Category	Category & name of the Shareholders (I)	PAN (II)	Number of Shareholders (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held VII= IV+V+VI	Shareholding % calculated as per SCRR, 1,957 as a % of (A+B+C2) VIII	Number of Voting rights held in each class of securities (IX)			No. of Shares Outstanding assuming conversion of convertible securities (including share capital (XI)=(VII)+(X))	Total share capital (XII)=(VII)+(X) as a % of (A+B+C2)	Number of Locked in shares (XII)**		Number of Shares Pledged or otherwise encumbered (XIII)		Number of Equity shares held in dematerialized form (XIV)	
									Number of Voting rights					Total as a % of Total Voting rights	No.(a)	As a % Total shares held (b)	No.(a)		As a % Total shares held
									Class X*	Class Y	Total								
(A)	Promoter and Promoter Group																		
(1)	Indian																		
(a)	Individuals/ Hindu Undivided Family		5	1362786	0	0	13,62,786	60.84	1362786	0	1362786	60.84	0	0	0	0	0	0.00	13,62,786
1	SUDARSHAN JALAN HUF	AAFHS8950Q	1	96244	0	0	96244	4.30	96244	0	96244	4.30	0	0	0	0	0	0.00	96244
2	SHIVANK JALAN FAMILY TRU	AAMTS3210J	1	110000	0	0	110000	4.91	110000	0	110000	4.91	0	0	0	0	0	0.00	110000
3	MINAKSHI JALAN	ACUPJ7440H	1	574544	0	0	574544	25.65	574544	0	574544	25.65	0	0	0	0	0	0.00	574544
4	SUDARSHAN JALAN	ACXPJ3756F	1	337908	0	0	337908	15.09	337908	0	337908	15.09	0	0	0	0	0	0.00	337908
5	PADMANABH JALAN	AFWPJ0680C	1	244090	0	0	244090	10.90	244090	0	244090	10.90	0	0	0	0	0	0.00	244090
(d)	Any other (Bodies Corporate)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	0	0	0	0.00	0
			5	1362786	0	0	13,62,786	60.84	1362786	0.00	1362786	60.84	0	0	0	0.00	0	0.00	13,62,786
(2)	Foreign																		
(a)	Individuals( Non-Resident individuals/ Foreign Individuals)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	0	0.00	0	0.00	0
(b)	Government		0	0	0	0	0	0.00	0	0	0	0.00	0	0	0	0.00	0	0.00	0
(c)	Institutions		0	0	0	0	0	0.00	0	0	0	0.00	0	0	0	0.00	0	0.00	0
(d)	Foreign Portfolio Investor		0	0	0	0	0	0.00	0	0	0	0.00	0	0	0	0.00	0	0.00	0
(e)	Any other (specify)		0	0	0	0	0	0.00	0.00	0	0	0.00	0	0	0	0.00	0	0.00	0
	Sub-Total (A) (2)		0	0	0	0	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0.00	0	0.00	0
	Total Shareholding of Promoter and Promoter Group (A) = (A)(1)+(A)(2)		5	1362786	0	0	13,62,786	61	13,62,786	0	13,62,786	61	0	0	0	0.00	0.00	0.00	13,62,786

Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.

Note:

(1) PAN would not be displayed on website of Stock Exchange(s)

(2) The term 'Encumbrance' has the same meaning as assigned under regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

## Annexure A

Table III - Statement showing shareholding pattern of the Public shareholder

Category & Name of the Shareholders (I)	PAN (II)	Nos. of share holder (III)	Nos. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding % calculate as per SCRR, 1957 As a % of (A)+(C2) (VIII)	Number of Voting Rights held in each class of securities (IX)			No. of Share Underlying Outstanding as a % convertible securities (including Warrants) (X)	Total shareholding assuming conversion of convertible securities (percentage of diluted share capital) (XI)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in materiality form (XIV)	Sub-categorization of shares (XV)				
								Class X	Class Y	Total			As a % of Total Voting rights	No. (a)	As a % of Total Shares held (b)	No. (a)		As a % of total shares held (b)	Sub-category (i)	Sub-category (ii)	Sub-category (iii)	
(1) Institutions (Domestic)																						
(a) Mutual Funds		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(b) Venture Capital Funds		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(c) Alternate Investment Funds		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(d) Banks		8	59556	0	0	59556	2.66	59556	59556	0.00	0	0	0	NA			0	0	0	0	0	
(1) CENTRAL BANK INDIA		1	30800	0	0	30800	1.38	30800	30800	1.38	0.00	0	0	NA			0	0	0	0	0	
(e) Insurance Companies		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(f) Provident / Pension Funds		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(g) Asset Reconstruction Companies		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(h) Sovereign Wealth Funds		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(i) NBFCs registered with RBI		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(j) Other Financial Institutions		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(k) Any Other (specify)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
Sub-Total (B1)		8	59556	0	0	59556	2.66	59556	59556	0.00	0	0	0	NA			0	0	0	0	0	
(2) Institutions (Foreign)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(a) Foreign Direct Investment		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(b) Foreign Venture Capital Investors		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(c) Sovereign Wealth Funds		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(d) Foreign Portfolio Investors Category I		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(e) Foreign Portfolio Investors Category II		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(f) Overseas Depositories (holding DRs) (balancing figure)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(g) Any Other (specify)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
Sub-Total (B2)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(3) Central Government / State Government(s)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(a) Central Government/President of India		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(b) State Government / Governor		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(c) Shareholding by Companies or Bodies Corporate where Central / State Government is a promoter		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
Sub-Total (B3)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(4) Non-institutions		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(a) Associate companies /Subsidiaries		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(b) Directors and their relatives (including independent directors and nominee directors)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(c) Key Managerial Personnel (As per list enclosed)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(d) Relatives of promoters (other than 'immediate relatives' of promoters disclosed under 'Promoter and Promoter Group' category)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(e) Trusts where any person belonging to 'Promoter and Promoter Group' category is 'trustee', 'beneficiary', or 'author of the trust'		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(f) Investor Education and Protection Fund (IEPF)		1	121181	0	0	121181	5.41	121181	0	121181	5.41	0	0	NA			121181	0	0	0	0	0
(a) Resident Individuals holding nominal share capital up to Rs. 2 lakhs		184	90916	0	0	90916	4.06	90916	0	90916	4.06	0	0	NA			29549	0	0	0	0	0
(b) Resident Individuals holding nominal share capital in excess of Rs. 2 lakhs		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(c) Non Resident Indians (NRIs)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(d) Foreign Nationals		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(e) Foreign Companies		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(5) Bodies Corporate		11	605561	0	0	605561	27.03	605561	0	605561	27.03	0	0	NA			605561	0	0	0	0	0
M/S. IRI INDUSTRIAL COMPANY LIMITED		1	316105	0	0	316105	14.11	316105	0	316105	14.11	0	0				316105	0	0	0	0	0
UPHAAR FINANCIAL SERVICES PVT.LTD		1	166109	0	0	166109	7.42	166109	0	166109	7.42	0	0				166109	0	0	0	0	0
SHAKTI FISCAL PVT.LTD		1	100700	0	0	100700	4.50	100700	0	100700	4.50	0	0				100700	0	0	0	0	0
(c) Any Other (specify)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
Sub-Total (B4)		195	817658	0	0	817658	36.50	817658	817658	0.00	0	0	0	NA			786291	0	0	0	0	0
Total Public Shareholding		9	0	0	0	0	0.00	0	0	0	0.00	0	0	NA			0	0	0	0	0	
(B) = (B1) + (B2) + (B3) + (B4)		204	877214	0	0	877214	39.16	817658	877214	0.00	0	0	0	NA			786291	0	0	0	0	0

Details of the shareholders acting as persons in Concert including their Shareholding (No. and %):

Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.

## Note:

(1) PAN would not be displayed on website of Stock Exchange(s).

(2) The above format needs to be disclosed along with the names of the shareholders holding 1% or more than 1% of shares of the listed entity. Column no. (XIII) is not applicable in the above format.

(3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available and the balance to be disclosed as held by custodian.

(4) Categorization and disclosure of each shareholder category should be carried out in the order prescribed in the above format. If a shareholder is falling under more than one category, then the same shall be classified in the category falling first in the order prescribed in the above format. Shareholding under any of the categories shall be unique and will not be duplicated under multiple categories.

(5) Sub-categorization of shares under column no. (XV) will be based on shareholding (no. of shares) under the following sub-categories:

(i) Shareholders who are represented by a nominee Director on the board of the listed entity or have the right to nominate a representative (i.e. Director) on the board of the listed entity.

(ii) Shareholders who have entered into shareholder agreement with the listed entity.

(iii) Shareholders acting as persons in concert with promoters.

Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder																		
	Category & Name of the Shareholders (I)	PAN (II)	Nos. of shareholder (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held VII = IV+V+VI	Shareholding as a % total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C 2) As a % of (A+B+C	Number of Voting Rights held in each class			No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Total shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)	Number of Locked		Number of Shares		Number of equity shares held in dematerialized form (XIV)
									No of Voting Rights					Total as a % of Total Voting rights	No. (a)	As a % of total Shares held (b)	No. (Not applicable) (a)	
									Class X	Class Y	Total							
(1)	Custodian/DR		NIL	NIL	NIL	NIL	N.A	N.A	NIL	NIL	NA	NA	NIL	NIL	NIL		NIL	
(a)	Name of DR Holder																NA	
(i)	abc,...																NA	
(ii)	efg,...																NA	
(2)	Employee Benefit																NA	
(a)	Name (abc...																NA	
	Total Non- Promoter-																NA	

**Note:**

- (1) PAN would not be displayed on website of Stock Exchange(s).
- (2) The above format needs to disclose name of all holders holding more than 1% of total number of shares
- (3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available

**Table VI - Statement showing foreign ownership limits**

	<b>Board approved limits</b>	<b>Limits utilized</b>
As on shareholding date		
As on the end of previous 1st quarter		
As on the previous 2nd quarter		
As on the end of previous 3rd quarter		
As on the end of previous 4th quarter		