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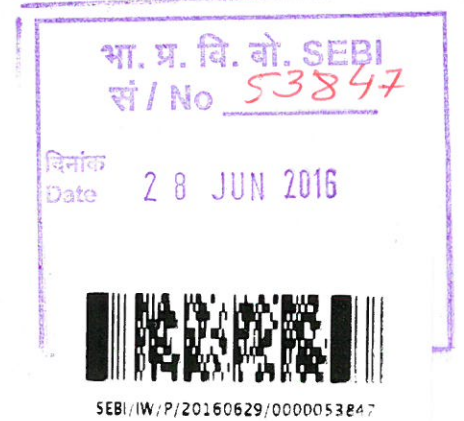
From:
Rupa Achal Bakeri
415, Bodakdev,
Ahmedabad - 380054

Date: 23 June 2016

Jal
4/17
DGM (AT)

AGM (AK)

To,
Chief General Manager,
Informal Guidance Scheme, 2003,
Corporate Finance Department,
SEBI,
'SEBI Bhavan' Plot C-4-A, 'G' Block,
Bandra Kurla Complex,
MUMBAI. 400 051



**Sub: Seeking Interpretive Letter pursuant to
Regulation 4 of SEBI (Informal Guidance
Scheme) 2003 as an Acquirer.**

**Ref: Under Regulation 10(1)(a)(i) "Immediate Relative"
read with Regulation 3 of SEBI (SAST) Regulations,
2011.**

1. I am a shareholder and Promoter Group Entity
of Symphony Ltd. (target company...
company) since long and have been shown as
part of promoter group entity during the
period including latest as on 31.03.2012,
31.03.2013 and 31.03.2016. As is evident from
the disclosure made pursuant to Listing

Agreement, I am holding 389750 shares constituting 1.114% of Paid Up Equity Share Capital of the company. The copy of Shareholding Pattern filed with the Exchange/s BSE / NSE is enclosed herewith for your ready reference.

2. My daughter Jonaki, who is a Director of the company and Promoter Group Entity of the company is holding 1579360 shares constituting 4.515% of Paid Up Equity Share Capital of the company. The same can be seen from the Shareholding Pattern Annexed herewith. My daughter Jonaki wants to Gift 1579360 shares constituting 4.515% of Paid Up Equity Share Capital of the company by way of Off Market transaction. The same can be seen from the Shareholding Pattern Annexed herewith.

3. My second daughter Hirva, being part of Promoter Group Entity of the company is holding 1579360 shares constituting 4.515% of Paid Up Equity Share Capital of the

company. The same can be seen from the Shareholding Pattern Annexed herewith. My daughter Hirva wants to Gift 1579360 shares constituting 4.515% of Paid Up Equity Share Capital of the company by way of Off Market transaction.

4. Therefore, if the transactions as has been contemplated in the impugned letter, if concluded, my shareholding will be increased from existing 389750 shares constituting 1.114% of Paid Up Equity Share Capital of the company to 3548470 shares constituting 10.144% of Paid Up Equity Share Capital of the company, i.e. an increase of 9.03% in my holding, however, there will not be any change in aggregate shareholding of the promoters group on account of inter se transfers amongst Promoters Group Entities.
5. On account of such off market transactions amongst immediate relatives as has been envisaged in Regulation 10 (1)(a)(i) of SEBI (SAST) Regulations, 2011, I do not foresee

any change in control or management of the company.

6. I understand that all three of us stand as Qualifying persons as has been envisaged in Regulation 10 (1)(a) of SEBI (SAST) Regulations, 2011 and thereby entitle to avail the benefit of General Exemption pursuant to Regulation 10 of SEBI (SAST) Regulations, 2011.
7. I intend to execute this transaction through off market transactions. All three of us belong to promoter group entities. Since my Daughter Jonaki is Director of the company and all of us are part of Promoter Group Entities, I apprehend attraction and invitation of provision of SEBI (Insider Code), 2015. Does SEBI (Insider Code), 2015 or any provision of SEBI Insider Code is attracted to the impugned contemplated transaction and if so, which, provision and kind of care deserves to be taken on our part.

8. I seek an interpretive letter as has been envisaged in Regulation 5 (ii) of SEBI (Informal Guidance Scheme), 2003 for the contemplated transactions referred hereinabove with an object to avail the benefit of exemption from inviting and invoking of provision of Regulation 3 related to OPEN OFFER consequent to the contemplated transaction.
9. I hope that to the best of my knowledge, I have tried to place on record the true and correct fact related to the contemplated transaction and intention of seeking benefit of the provision of SEBI (SAST), 2011 and SEBI (Insider Code), 2015. I understand that the impugned transaction described hereinabove has no bearing or definite impact on any other similarly placed transactions or pending enquiries, if any. However, if you need any further information or clarification for the contemplated transactions, kindly intimate me at the earliest and oblige.

10. In compliance with the provision of Regulation 6(ii) of SEBI (Informal Guidance Scheme), 2003, a Demand Draft of Rs. 25,000/- drawn on HDFC Bank bearing No. "141913" dated 21.06.2016 is enclosed herewith.
11. You are requested to dispose of my request as early as possible as has been envisaged in Regulation 7 of SEBI (Informal Guidance Scheme), 2003.
12. Awaiting your affirmative consideration;



Rupa Achal Bakeri

Enclosed: As stated above.

Shareholding Pattern

Symphony Limited

Security Code : 517385
Date Begin : 01 Jan 2012

Quarter Ending : March 2012
Date End : 31 Mar 2012

Partly paid-up shares	No. of partly paid-up shares	As a % of total no. of partly paid-up shares	As a % of total no. of shares of the company
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00

Outstanding convertible securities	No. of outstanding securities	As a % of total no. of outstanding convertible securities	As a % of total no. of shares of the company assuming full conversion of the convertible securities
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00

Warrants	No. of warrant	As a % of total no. of warrants	As a % of total no. of shares of the company assuming full conversion of warrants
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00

Total Paid-up capital of the company assuming full conversion of warrants and convertible securities

34978500

Category of Shareholder	No. of Shareholders	Total No. of Shares	Total No. of Shares held in Dematerialized Form	Total Shareholding as a % of Total No. of Shares		Shares pledged or otherwise encumbered	
				As a % of (A+B)	As a % of (A+B+C)	Number of shares	As a % of Total No. of Shares

(A) Shareholding of Promoter and Promoter Group

(1) Indian

Individuals / Hindu Undivided Family	7	19992270	19992270	57.16	57.16	0	0.00
Bodies Corporate	2	6241600	6241600	17.84	17.84	0	0.00
Sub Total	9	26233870	26233870	75.00	75.00	0	0.00

(2) Foreign

Total shareholding of Promoter and Promoter Group (A)

9 26233870 26233870 75.00 75.00 0 0.00

(B) Public Shareholding

(1) Institutions

Mutual Funds / UTI	2	169452	169452	0.48	0.48	0	0.00
Foreign Institutional Investors	2	3500	500	0.01	0.01	0	0.00

Sub Total	4	172952	169952	0.49	0.49	0	0.00
(2) Non-Institutions							
Bodies Corporate	228	3759351	3704963	10.75	10.75	0	0.00
Individuals							
Individual shareholders holding nominal share capital up to Rs. 1 lakh	5658	3555267	2152592	10.16	10.16	0	0.00
Individual shareholders holding nominal share capital in excess of Rs. 1 lakh	6	1037382	1037382	2.97	2.97	0	0.00
Any Others (Specify)	305	219678	55678	0.63	0.63	0	0.00
Non Resident Indians	305	219678	55678	0.63	0.63	0	0.00
Sub Total	6197	8571678	6950615	24.51	24.51	0	0.00
Total Public shareholding (B)	6201	8744630	7120567	25.00	25.00	0	0.00
Total (A)+(B)	6210	34978500	33354437	100.00	100.00	0	0.00
(C) Shares held by Custodians and against which Depository Receipts have been issued							
	0	0	0	0.00	0.00	0	0.00
(1)	0	0	0	0.00	0.00	0	0.00
(2)	0	0	0	0.00	0.00	0	0.00
Sub Total	0	0	0	0.00	0.00	0	0.00
Total (A)+(B)+(C)	6210	34978500	33354437	0.00	100.00	0	0.00

Notes:

1. For determining public shareholding for the purpose of Clause 40A
2. For definitions of Promoter and Promoter Group, refer to Clause 40A.
3. Public shareholding

Chandrakant Gandhi
Company Secretary

[Click here for Shareholding belonging to the category "Promoter and Promoter Group"](#)

[Click here for Shareholding belonging to the category "Public" and holding more than 1% of the Total No. of Shares](#)

[Click here for Shareholding belonging to the category "Public" and holding more than 5% of the Total No. of Shares](#)

[Click here for Details of Locked-in Shares](#)

[Click here for Details of Depository Receipts \(DRs\)](#)

[Click here for Holding of Depository Receipts \(DRs\), where underlying shares held by 'promoter/promoter group' are in excess of 1% of the total number of shares.](#)

Shareholding Pattern

Symphony Limited

Scrip Code : 517385

Quarter ending : March 2012

Shareholding of securities (including shares, warrants, convertible securities) of persons belonging to the category Promoter and Promoter Group

Sl.No.	Name of the Shareholder	Details of Shares held		Encumbered shares (*)			Details of warrants		Details of convertible securities		Total shares (including underlying shares assuming full conversion of warrants and convertible securities) as a % of diluted share capital
		No. of Shares held	As a % of grand total (A)+ (B)+ (C)	No	As a percentage	As a % of grand total (A)+ (B)+ (C) of sub-clause (I)(a)	Number of warrants held	As a % total number of warrants of the same class	Number of convertible securities held	As a % total number of convertible securities of the same class	
1	Achal Anil Bakeri	1,46,31,800	41.83	0	0.00	0.00	0	0.00	0	0.00	0.00
2	Oras Investments Pvt Ltd	32,21,800	9.21	0	0.00	0.00	0	0.00	0	0.00	0.00
3	Paratam Investments Pvt Ltd	30,19,800	8.63	0	0.00	0.00	0	0.00	0	0.00	0.00
4	Jonaki Achal Bakeri	15,79,360	4.52	0	0.00	0.00	0	0.00	0	0.00	0.00
5	Hirva Achal Bakeri	15,79,360	4.52	0	0.00	0.00	0	0.00	0	0.00	0.00
6	Achal Anil Bakeri HUF	12,00,000	3.43	0	0.00	0.00	0	0.00	0	0.00	0.00
7	Pavan Bakeri	6,02,000	1.72	0	0.00	0.00	0	0.00	0	0.00	0.00
8	Rupa Achal Bakeri	3,89,750	1.11	0	0.00	0.00	0	0.00	0	0.00	0.00
9	Hansa Bakeri	10,000	0.03	0	0.00	0.00	0	0.00	0	0.00	0.00
	Total	2,62,33,870	75.00	0	0.00	0.00	0	0.00	0	0.00	0.00

(*) The term encumbrance has the same meaning as assigned to it in regulation 28(3) of the SAST Regulations, 2011.

Shareholding Pattern

Symphony Limited

Security Code : 517385
Date Begin : 01 Jan 2013

Quarter Ending : March 2013
Date End : 31 Mar 2013

Partly paid-up shares	No. of partly paid-up shares	As a % of total no. of partly paid-up shares	As a % of total no. of shares of the company
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00
Outstanding convertible securities	No. of outstanding securities	As a % of total no. of outstanding convertible securities	As a % of total no. of shares of the company assuming full conversion of the convertible securities
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00
Warrants	No. of warrant	As a % of total no. of warrants	As a % of total no. of shares of the company assuming full conversion of warrants
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00
Total Paid-up capital of the company assuming full conversion of warrants and convertible securities			
	34978500		

Category of Shareholder	No. of Shareholders	Total No. of Shares	Total No. of Shares held in Dematerialized Form	Total Shareholding as a % of Total No. of Shares	Shares pledged or otherwise encumbered	As a % of (A+B)	As a % of (A+B+C)	Number of shares	As a % of Total No. of Shares
(A) Shareholding of Promoter and Promoter Group									
(1) Indian									
Individuals / Hindu Undivided Family	7	19992270	19992270	57.16	57.16	0	0.00		
Bodies Corporate	2	6241600	6241600	17.84	17.84	0	0.00		
Sub Total	9	26233870	26233870	75.00	75.00	0	0.00		
(2) Foreign									
Total shareholding of Promoter and Promoter Group (A)	9	26233870	26233870	75.00	75.00	0	0.00		
(B) Public Shareholding									
(1) Institutions									
Mutual Funds / UTI	5	649318	627818	1.86	1.86	0	0.00		
Financial Institutions / Banks	2	13720	13720	0.04	0.04	0	0.00		

Foreign Institutional Investors	7	687571	684571	1.97	1.97	0	0.00
Sub Total	14	1350609	1326109	3.86	3.86	0	0.00
(2) Non-Institutions							
Bodies Corporate	223	2988224	2958224	8.54	8.54	0	0.00
Individuals							
Individual shareholders holding nominal share capital up to Rs. 1 lakh	5924	3235549	2021124	9.25	9.25	0	0.00
Individual shareholders holding nominal share capital in excess of Rs. 1 lakh	40	930938	930938	2.66	2.66	0	0.00
Any Others (Specify)	319	239310	88310	0.68	0.68	0	0.00
Non Resident Indians	319	239310	88310	0.68	0.68	0	0.00
Sub Total	6506	7394021	5998596	21.14	21.14	0	0.00
Total Public shareholding (B)	6520	8744630	7324705	25.00	25.00	0	0.00
Total (A)+(B)	6529	34978500	33558575	100.00	100.00	0	0.00
(C) Shares held by Custodians and against which Depository Receipts have been issued	0	0	0	0.00	0.00	0	0.00
(1)	0	0	0	0.00	0.00	0	0.00
(2)	0	0	0	0.00	0.00	0	0.00
Sub Total	0	0	0	0.00	0.00	0	0.00
Total (A)+(B)+(C)	6529	34978500	33558575	0.00	100.00	0	0.00

Notes:

1. For determining public shareholding for the purpose of Clause 40A
2. For definitions of Promoter and Promoter Group, refer to Clause 40A.
3. Public shareholding

Chandrakant Gandhi
Company Secretary

Click here for Shareholding belonging to the category "Promoter and Promoter Group"

Click here for Shareholding belonging to the category "Public" and holding more than 1% of the Total No. of Shares

Click here for Shareholding belonging to the category "Public" and holding more than 5% of the Total No. of Shares

Click here for Details of Locked-in Shares

Click here for Details of Depository Receipts (DRs)

Click here for Holding of Depository Receipts (DRs), where underlying shares held by 'promoter/promoter group' are in excess of 1% of the total number of shares.

Shareholding Pattern

Symphony Limited

Scrip Code : 517385

Quarter ending : March 2013

Shareholding of securities (including shares, warrants, convertible securities) of persons belonging to the category Promoter and Promoter Group

Sl.No.	Name of the Shareholder	Details of Shares held		Encumbered shares (*)			Details of warrants		Details of convertible securities		Total shares (including underlying shares assuming full conversion of warrants and convertible securities) as a % of diluted share capital
		No. of Shares held	As a % of grand total (A)+(B)+(C)	No	As a percentage	As a % of grand total (A)+(B)+(C) of sub-clause (I)(a)	Number of warrants held	As a % total number of warrants of the same class	Number of convertible securities held	As a % total number of convertible securities of the same class	
1	Achal Anil Bakeri	1,46,31,800	41.83	0	0.00	0.00	0	0.00	0	0.00	0.00
2	Oras Investments Pvt Ltd	32,21,800	9.21	0	0.00	0.00	0	0.00	0	0.00	0.00
3	Paratam Investments Pvt Ltd	30,19,800	8.63	0	0.00	0.00	0	0.00	0	0.00	0.00
4	Jonaki Achal Bakeri	15,79,360	4.52	0	0.00	0.00	0	0.00	0	0.00	0.00
5	Hirva Achal Bakeri	15,79,360	4.52	0	0.00	0.00	0	0.00	0	0.00	0.00
6	Achal Anil Bakeri	12,00,000	3.43	0	0.00	0.00	0	0.00	0	0.00	0.00
7	Pavan Bakeri	6,02,000	1.72	0	0.00	0.00	0	0.00	0	0.00	0.00
8	Rupa Achal Bakeri	3,89,750	1.11	0	0.00	0.00	0	0.00	0	0.00	0.00
9	Hansa Bakeri	10,000	0.03	0	0.00	0.00	0	0.00	0	0.00	0.00
	Total	2,62,33,870	75.00	0	0.00	0.00	0	0.00	0	0.00	0.00

(*) The term encumbrance has the same meaning as assigned to it in regulation 28(3) of the SAST Regulations, 2011.

Shareholding Pattern

Symphony Limited

Security Code : 517385
Date Begin : 01 Jan 2014

Quarter Ending : March 2014
Date End : 31 Mar 2014

Partly paid-up shares	No. of partly paid-up shares	As a % of total no. of partly paid-up shares	As a % of total no. of shares of the company
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00
Outstanding convertible securities	No. of outstanding securities	As a % of total no. of outstanding convertible securities	As a % of total no. of shares of the company assuming full conversion of the convertible securities
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00
Warrants	No. of warrant	As a % of total no. of warrants	As a % of total no. of shares of the company assuming full conversion of warrants
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00
Total Paid-up capital of the company assuming full conversion of warrants and convertible securities			
	34978500		

Category of Shareholder	No. of Shareholders	Total No. of Shares	Total No. of Shares held in Dematerialized Form	Total Shareholding as a % of Total No. of Shares		Shares pledged or otherwise encumbered	
				As a % of (A+B)	As a % of (A+B+C)	Number of shares	As a % of Total No. of Shares

(A) Shareholding of Promoter and Promoter Group

(1) Indian

Individuals / Hindu Undivided Family	7	19992270	19992270	57.16	57.16	0	0.00
Bodies Corporate	2	6241600	6241600	17.84	17.84	0	0.00
Sub Total	9	26233870	26233870	75.00	75.00	0	0.00

(2) Foreign

Total shareholding of Promoter and Promoter Group (A)	9	26233870	26233870	75.00	75.00	0	0.00
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(B) Public Shareholding

(1) Institutions

Mutual Funds / UTI	5	767618	746118	2.19	2.19	0	0.00
Financial Institutions / Banks	2	807	807	0.00	0.00	0	0.00

Foreign Institutional Investors	7	1271543	1268543	3.64	3.64	0	0.00
Sub Total	14	2039968	2015468	5.83	5.83	0	0.00
(2) Non-Institutions							
Bodies Corporate	288	2785571	2755571	7.96	7.96	0	0.00
Individuals							
Individual shareholders holding nominal share capital up to Rs. 1 lakh	6159	3083866	1971691	8.82	8.82	0	0.00
Individual shareholders holding nominal share capital in excess of Rs. 1 lakh	4	542613	542613	1.55	1.55	0	0.00
Any Others (Specify)	458	292612	147112	0.84	0.84	0	0.00
Non Resident Indians	363	260282	114782	0.74	0.74	0	0.00
Trusts	1	600	600	0.00	0.00	0	0.00
Clearing Members	94	31730	31730	0.09	0.09	0	0.00
Sub Total	6909	6704662	5416987	19.17	19.17	0	0.00
Total Public shareholding (B)	6923	8744630	7432455	25.00	25.00	0	0.00
Total (A)+(B)	6932	34978500	33666325	100.00	100.00	0	0.00
(C) Shares held by Custodians and against which Depository Receipts have been issued							
	0	0	0	0.00	0.00	0	0.00
(1)	0	0	0	0.00	0.00	0	0.00
(2)	0	0	0	0.00	0.00	0	0.00
Sub Total	0	0	0	0.00	0.00	0	0.00
Total (A)+(B)+(C)	6932	34978500	33666325	0.00	100.00	0	0.00

Notes:

1. For determining public shareholding for the purpose of Clause 40A
2. For definitions of Promoter and Promoter Group, refer to Clause 40A.
3. Public shareholding

Chandrakant Gandhi
Company Secretary

[Click here](#) for Shareholding belonging to the category "Promoter and Promoter Group"

[Click here](#) for Shareholding belonging to the category "Public" and holding more than 1% of the Total No. of Shares

[Click here](#) for Shareholding belonging to the category "Public" and holding more than 5% of the Total No. of Shares

[Click here](#) for Details of Locked-in Shares

[Click here](#) for Details of Depository Receipts (DRs)

[Click here](#) for Holding of Depository Receipts (DRs), where underlying shares held by 'promoter/promoter group' are in excess of 1% of the total number of shares.

[Click here](#) for Details of Disclosure by Trading Members (TM) holding 1% or more of the Total No. of Shares.

Shareholding Pattern

Symphony Limited

Scrip Code : 517385

Quarter ending : March 2014

Shareholding of securities (including shares, warrants, convertible securities) of persons belonging to the category Promoter and Promoter Group

Sl.No.	Name of the Shareholder	Details of Shares held		Encumbered shares (*)			Details of warrants		Details of convertible securities		Total shares (including underlying shares assuming full conversion of warrants and convertible securities) as a % of diluted share capital
		No. of Shares held	As a % of grand total (A)+(B)+(C)	No	As a percentage	As a % of grand total (A)+(B)+(C) of sub-clause (I)(a)	Number of warrants held	As a % total number of warrants of the same class	Number of convertible securities held	As a % total number of convertible securities of the same class	
1	Achal Anil Bakeri	1,46,31,800	41.83	0	0.00	0.00	0	0.00	0	0.00	41.83
2	Oras Investments Pvt Ltd	32,21,800	9.21	0	0.00	0.00	0	0.00	0	0.00	9.21
3	Paratam Investments Pvt Ltd	30,19,800	8.63	0	0.00	0.00	0	0.00	0	0.00	8.63
4	Jonaki Achal Bakeri	15,79,360	4.52	0	0.00	0.00	0	0.00	0	0.00	4.52
5	Hirva Achal Bakeri	15,79,360	4.52	0	0.00	0.00	0	0.00	0	0.00	4.52
6	Achal Anil Bakeri	12,00,000	3.43	0	0.00	0.00	0	0.00	0	0.00	3.43
7	Pavan Bakeri	6,02,000	1.72	0	0.00	0.00	0	0.00	0	0.00	1.72
8	Rupa Achal Bakeri	3,89,750	1.11	0	0.00	0.00	0	0.00	0	0.00	1.11
9	Hansa Bakeri	10,000	0.03	0	0.00	0.00	0	0.00	0	0.00	0.03
	Total	2,62,33,870	75.00	0	0.00	0.00	0	0.00	0	0.00	75.00

(*) The term encumbrance has the same meaning as assigned to it in regulation 28(3) of the SAST Regulations, 2011.

Shareholding Pattern

Symphony Limited

Security Code : 517385
Date Begin : 01 Jan 2015

Quarter Ending : March 2015
Date End : 31 Mar 2015

Partly paid-up shares	No. of partly paid-up shares	As a % of total no. of partly paid-up shares	As a % of total no. of shares of the company
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00
Outstanding convertible securities	No. of outstanding securities	As a % of total no. of outstanding convertible securities	As a % of total no. of shares of the company assuming full conversion of the convertible securities
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00
Warrants	No. of warrant	As a % of total no. of warrants	As a % of total no. of shares of the company assuming full conversion of warrants
Held by promoter/promoter group	0	0.00	0.00
held by public	0	0.00	0.00
Total	0	0.00	0.00
Total Paid-up capital of the company assuming full conversion of warrants and convertible securities			
	34978500		

Category of Shareholder	No. of Shareholders	Total No. of Shares	Total No. of Shares held in Dematerialized Form	Total Shareholding as a % of Total No. of Shares		Shares pledged or otherwise encumbered	As a % of Total No. of Shares
				As a % of (A+B)	As a % of (A+B+C)	Number of shares	
(A) Shareholding of Promoter and Promoter Group							
(1) Indian							
Individuals / Hindu Undivided Family	6	18412910	18412910	52.64	52.64	0	0.00
Bodies Corporate	2	6241600	6241600	17.84	17.84	0	0.00
Sub Total	8	24654510	24654510	70.48	70.48	0	0.00
(2) Foreign							
Individuals (Non-Residents Individuals / Foreign Individuals)	1	1579360	1579360	4.52	4.52	0	0.00
Sub Total	1	1579360	1579360	4.52	4.52	0	0.00
Total shareholding of Promoter and Promoter Group (A)	9	26233870	26233870	75.00	75.00	0	0.00

(B) Public Shareholding

(1) Institutions

Mutual Funds / UTI	9	678875	657375	1.94	1.94	0	0.00
Financial Institutions / Banks	2	11388	11388	0.03	0.03	0	0.00
Insurance Companies	1	38940	38940	0.11	0.11	0	0.00
Foreign Institutional Investors	35	1889359	1886359	5.40	5.40	0	0.00
Any Others (Specify)	13	348603	348603	1.00	1.00	0	0.00
Foreign Portfolio Investor (Corporate)	13	348603	348603	1.00	1.00	0	0.00
Sub Total	60	2967165	2942665	8.48	8.48	0	0.00
(2) Non-Institutions							
Bodies Corporate	351	1976198	1950198	5.65	5.65	0	0.00
Individuals							
Individual shareholders holding nominal share capital up to Rs. 1 lakh	8895	2841388	1931788	8.12	8.12	0	0.00
Individual shareholders holding nominal share capital in excess of Rs. 1 lakh	4	388467	388467	1.11	1.11	0	0.00
Any Others (Specify)	602	571412	438412	1.63	1.63	0	0.00
Non Resident Indians	490	266335	133335	0.76	0.76	0	0.00
Trusts	1	600	600	0.00	0.00	0	0.00
Clearing Members	107	17506	17506	0.05	0.05	0	0.00
Directors & their Relatives & Friends	4	286971	286971	0.82	0.82	0	0.00
Sub Total	9852	5777465	4708865	16.52	16.52	0	0.00
Total Public shareholding (B)	9912	8744630	7651530	25.00	25.00	0	0.00
Total (A)+(B)	9921	34978500	33885400	100.00	100.00	0	0.00
(C) Shares held by Custodians and against which Depository Receipts have been issued	0	0	0	0.00	0.00	0	0.00
(1)	0	0	0	0.00	0.00	0	0.00
(2)	0	0	0	0.00	0.00	0	0.00
Sub Total	0	0	0	0.00	0.00	0	0.00
Total (A)+(B)+(C)	9921	34978500	33885400	0.00	100.00	0	0.00

Notes:

1. For determining public shareholding for the purpose of Clause 40A

2. For definitions of Promoter and Promoter Group, refer to Clause 40A.

3. Public shareholding

4. (A) Executive Director:

Total 6,99,902 equity shares (2.00%) held by himself, spouse, two bodies corporate in which Mr. Nrupesh Shah, Executive Director, is substantially interested as a promoter and fathers HUF. These have been reported in Annual Reports. Mr. Nrupesh Shah is not a promoter director and hence holding classified under 'Others' category. The break up is as under:

(i) 4,13,431 equity shares held by two bodies corporate in which Mr. Nrupesh Shah is substantially interested have been classified under "Bodies Corporate" category.

(ii) 2,86,471 equity shares in aggregate held by himself, spouse and father's HUF classified under 'Others'

(B) Independent Director: Includes 500 equity shares held by Mr. Himanshu Shah, Independent Director which have been reported in Annual Reports

Click here for Shareholding belonging to the category "Promoter and Promoter Group"

Click here for Shareholding belonging to the category "Public" and holding more than 1% of the Total No. of Shares

Click here for Shareholding belonging to the category "Public" and holding more than 5% of the Total No. of Shares

Click here for Details of Locked-in Shares

Click here for Details of Depository Receipts (DRs)

Click here for Holding of Depository Receipts (DRs), where underlying shares held by 'promoter/promoter group' are in excess of 1% of the total number of shares.

Click here for Details of Disclosure by Trading Members (TM) holding 1% or more of the Total No. of Shares.

Shareholding Pattern

Symphony Limited

Scrip Code : 517385

Quarter ending : March 2015

Shareholding of securities (including shares, warrants, convertible securities) of persons belonging to the category Promoter and Promoter Group

Sl. No.	Name of the Shareholder	Details of Shares held		Encumbered shares (*)			Details of warrants		Details of convertible securities		Total shares (including underlying shares assuming full conversion of warrants and convertible securities) as a % of paid up share capital
		No. of Shares held	As a % of grand total (A)+(B)+(C)	No	As a percentage	As a % of grand total (A)+(B)+(C) of sub-clause (I)(a)	Number of warrants held	As a % total number of warrants of the same class	Number of convertible securities held	As a % total number of convertible securities of the same class	
1	Achal Anil Bakeri	1,46,31,800	41.83	0	0.00	0.00	0	0.00	0	0.00	41.83
2	Oras Investments Pvt Ltd	32,21,800	9.21	0	0.00	0.00	0	0.00	0	0.00	9.21
3	Paratam Investments Pvt Ltd	30,19,800	8.63	0	0.00	0.00	0	0.00	0	0.00	8.63
4	Jonaki Achal Bakeri	15,79,360	4.52	0	0.00	0.00	0	0.00	0	0.00	4.52
5	Hirva Achal Bakeri	15,79,360	4.52	0	0.00	0.00	0	0.00	0	0.00	4.52
6	Achal Anil Bakeri	12,00,000	3.43	0	0.00	0.00	0	0.00	0	0.00	3.43
7	Pavan Bakeri	6,02,000	1.72	0	0.00	0.00	0	0.00	0	0.00	1.72
8	Rupa Achal Bakeri	3,89,750	1.11	0	0.00	0.00	0	0.00	0	0.00	1.11
9	Hansa Bakeri	10,000	0.03	0	0.00	0.00	0	0.00	0	0.00	0.03
	Total	2,62,33,870	75.00	0	0.00	0.00	0	0.00	0	0.00	75.00

(*) The term encumbrance has the same meaning as assigned to it in regulation 28(3) of the SAST Regulations, 2011.



Shareholding Pattern

Symphony Limited

Scrip Code : 517385

Quarter ending : March 2016

Summary statement holding of specified securities

Category of shareholder	Nos. of shareholders	No. of fully paid up equity shares held	Total nos. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) As a % of (A+B+C2)	Number of equity shares held in dematerialized form
(A) Promoter & Promoter Group	9	2,62,33,870	2,62,33,870	75.00	2,62,33,870
(B) Public	12,957	87,44,630	87,44,630	25.00	79,09,980
(C1) Shares underlying DRs				0.00	
(C2) Shares held by Employee Trust				0.00	
(C) Non Promoter- Non Public				0.00	
Grand Total	12,966	3,49,78,500	3,49,78,500	100.00	3,41,43,850

Note: C=C1+C2

Grand Total=A+B+C

[Click here for "Statement showing shareholding pattern of the Promoter and Promoter Group"](#)

[Click here for Statement showing shareholding pattern of the Public shareholder](#)

[Click here for Statement showing shareholding pattern of the Non Promoter- Non Public shareholder](#)

[Click here for Details of Disclosure by Trading Members \(TM\) holding 1% or more of the Total No. of Shares.](#)



Shareholding Pattern

Symphony Limited

Scrip Code : 517385

Quarter Ending : March 2016

Statement showing shareholding pattern of the Promoter and Promoter Group

Category of shareholder	Nos. of shareholders	No. of fully paid up equity shares held	Total nos. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) As a % of (A+B+C2)	Number of equity shares held in dematerialized form
A1) Indian				0.00	
Individuals/Hindu undivided Family	6	1,84,12,910	1,84,12,910	52.64	1,84,12,910
HANSA BAKERI		10,000	10,000	0.03	10,000
RUPA ACHAL BAKERI		3,89,750	3,89,750	1.11	3,89,750
PAVAN BAKERI		6,02,000	6,02,000	1.72	6,02,000
ACHAL ANIL BAKERI HUF		12,00,000	12,00,000	3.43	12,00,000
JONAKI ACHAL BAKERI		15,79,360	15,79,360	4.52	15,79,360
ACHAL ANIL BAKERI		1,46,31,800	1,46,31,800	41.83	1,46,31,800
Any Other (specify)	2	62,41,600	62,41,600	17.84	62,41,600
PARATAM INVESTMENTS PVT. LTD.	1	30,19,800	30,19,800	8.63	30,19,800
ORAS INVESTMENTS PVT. LTD.	1	32,21,800	32,21,800	9.21	32,21,800
Sub Total A1	8	2,46,54,510	2,46,54,510	70.48	2,46,54,510
A2) Foreign				0.00	
Individuals (NonResident Individuals/ Foreign Individuals)	1	15,79,360	15,79,360	4.52	15,79,360
HIRVA ACHAL BAKERI		15,79,360	15,79,360	4.52	15,79,360
Sub Total A2	1	15,79,360	15,79,360	4.52	15,79,360
A=A1+A2	9	2,62,33,870	2,62,33,870	75.00	2,62,33,870



Shareholding Pattern

Symphony Limited

Scrip Code : 517385

Quarter ending :March 2016

Summary statement holding of specified securities

Category of shareholder	Nos. of shareholders	No. of fully paid up equity shares held	Total nos. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957)As a % of (A+B+C2)	Number of equity shares held in dematerialized form
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(C1) Shares underlying DRs				0.00	
(C2) Shares held by Employee Trust				0.00	
(C) Non Promoter- Non Public				0.00	
Grand Total	12,966	3,49,78,500	3,49,78,500	100.00	3,41,43,850

Note: C=C1+C2

Grand Total=A+B+C

[Click here for "Statement showing shareholding pattern of the Promoter and Promoter Group"](#)

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[Click here for Details of Disclosure by Trading Members \(TM\) holding 1% or more of the Total No. of Shares.](#)