

## KAMDHENU ISPAT LIMITED

Corporate Office: 2nd Floor, Tower A, Building No. 9, DLF Cyber City, Phase III Gurgaon - 122002 (Haryana) Phone: 0124 - 4604500 (30 Lines) Fax: 0124 - 4218524 E-mail: kamdhenu@kamdhenuispat.com, Website: www.kamdhenuispat.com

07th July, 2010

To,
The Incharge
Takeover Division
Securities and Exchange Board of India
Plot No.C4-A, 'G' Block,
Bandra Kurla Complex,
Bandra (East), Mumbai 400051

Subject :

Availing "Securities and Exchange Board of India (Informal Guidance)

Scheme, 2003" for Acquisition of shares by promoters under Regulation 11(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 1997.

Re:

Our letter dated 19th June 2010

Dear Sir,

In continuation of our letter dated 19th June, 2010 wherein we have mentioned that as per Regulation 11 (1), the Acquirer along with the persons acting in concert with them holding 15% or more but less than 55% of total shares/voting rights of the company, can acquire further 5% shares in any financial year (with post acquisition holding does not exceed 55%) as creeping acquisition.

Further as per Regulation 11 (2), the Acquirer together with persons acting in concert who are holding 55% or more but less than 75% shares, if acquires any additional shares, shall have to make a public announcement to acquire the shares.

However, as per second proviso to Regulation 11 (2), the acquirer may, [notwithstanding the acquisition made under Regulation 11 (1)] acquire further 5% shares of total shares of the company, without making any public announcement, provided that the post acquisition shareholding does not exceeds 75% subject to other conditions mentioned therein.

In continuation to the above and pursuant to our telephonic discussion with Mr. Deep Shah from your good office, we would like to avail the "Securities and Exchange Board of India (Informal Guidance) Scheme, 2003".

In accordance with the Para 5 (ii) of the "Securities and Exchange Board of India (Informal Guidance) Scheme, 2003", we would like to seek the guidance of the SEBI by way of "Interpretive Letter" in context of the following proposed transaction:





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In our case, the promoters' shareholding in the Company as on 31.03.2010 stands at 54.97 % through creeping acquisition and intends to go upto 55% under Regulation 11(1) and further they are desirous to increase their holding by 5 % in terms of Second Proviso to Regulation 11(2) without making any public announcement, by way of purchase from open market in normal segment on the stock exchange. The said acquisition of 5% shall not be through bulk deal/block deal/negotiated deal/preferential allotment.

In the light of the above, our specific queries are as below:

- A) Can the Promoters acquire additional 0.03% shares during the Financial Year 2010-11 as per Regulation 11 (1) so as to reach 55%.
- B) Can Promoters further acquire 5% as per Second Proviso of Regulation 11 (2).
- C) Can the above acquisitions, as mentioned in (A) and (B); be done in the Financial Year 2010-11.

You are requested to please advice in the said matter in accordance with Para 5 (ii) of the "Securities and Exchange Board of India (Informal Guidance) Scheme, 2003".

For the sake of convenience and ready reference the shareholding pattern of the Company as on 31-03-2010 and 30-06-2010 is enclosed herewith as **Annexure A** and **Annexure B**.

As per the Guidelines, a Demand Draft of Rs. 25,000/- payable at Mumbai, No. 501262 dated 01-07-2010 Drawn on State Bank of Bikaner and Jaipur towards the fees for the same is enclosed herewith.

Your immediate response in the matter would be highly appreciated.

Thanking you.

Yours truly,

For Kamdhenu Ispat Limited

Yogendra Dwivedi Company Secretary

Encl: A/a

ANNEXURE A.

	1	NAME	NAME OF THE COMPANY : KAMEDIFENIS ISPAT 1TO	KAMEDHENIS ISPAT	0.110			
			SCRIP CODE: 532741(R	CODE: 532747(RSF) and IOI (NSF)				
	Auth	Capital: 3,00,00,000 5ha	Capital: 3,00,00,000 Shares of Rt. 10 each and Paid Up Capital: 1,90,11,066 shaares of Rt. 10/- each	id Up Capital : 1,90,11,0	66 shaares of Rs. 10/- ea	Đ.		
SORIP		(3) (4)	(I) (a) STATEMENT SHOWING SHAREHOLDING PATTERN	SHAREHOLDING PATTER	Z	-		
QUARTER ENDED	ARTER ENDED : 31.03.2010							
CATEGORY	CATEGORY OF SHABEHOLDERS	NEMBER OF	TOTAL	NUMBER OF SHARES	TOTAL SHAREHOLDING AS A PERCENTAGE OF	AS A PERCENTAGE OF	SHARES PLEDGED OR OTHERWISE	OR OTHERWISE
		SHAREHOLDERS	SHARES	DEMATERIALIZED	AS A PERCENTAGE OF	CENTAGE OF AS A PERCENTAGE OF	ENCOMBERED	BERED
ε	(11)	(111)	(30)	3	(A+B) 1	(A+8+C)	NUMBER OF SHARES	AS A PERCENTAGE
<b>3 3</b>	PROMOTER AND PROMOTER GROUP							200 (a.t. //
1.0	Individuals / Hindu Undividend Family		5694463	14600747	20,00	00.00		
(9)	Central Government/State Government(s)			0	0.90	0.00		0.00
(c)	Sodies Corporate	4	360518	3605183	18.96	18.96		0.0
	Financial Institutions / Banks	0	0	0	0.00	00.0	0	0.00
(e)	Any Others	0	0	0	00.0	0.00	0	0.00
	Sub-Total (8) (1)	7.6	1001101	souther.	1045			
	(a) (c)	12	+TOCH+OT	10203034	76.46	54.97		0.00
(2)	FOREIGN							
(e)	Individuals (NRIs/Foreign Individuals)	0	o	0	0.00	0.00	0	0.00
	Bodies Corporate	0		٥	00:0	00:00	0	0.00
	Institutions	0		٥	00:00	00.00	0	00'0
	Sub-Total (altra)	٥	0 0	٥	00.0	00:00	0	0.00
					000	0.00		0.00
	Total Share Holding of Promoter and Promoter Group	!						
	(A)=(A)(1)+(A)(2)	27	10449814	10263894	54.97	54.97	0	0.00
	PUBLIC SHAREHOLDING 3						42	42
	INSTITUTIONS					-	\$ 2	Y AV
	Mutual Funds /UTI	0	0	o	00:00	00.00		
	Financial Institutions / Banks	1	700	700	00.00	00:0		
	Central Government / State Government(s)	0		0 0	0.00	00:0		
	Insurance Companies	Ö	0	0	0.00	0.00		
	Foreign Institutional Investors	0	0	0	0.00	0.0		
	Foreign Venture Capital Investors	0	0	0	00:00	00.0		
	Any Others	0	0	٥	00.0	00:0		
	15784							
ŀ	Sub-lotal (B)(1):	1	700	700	00:0	00:00		
	NON-INSTITUTIONS						AN	AM
	Bodies Corporate	390	2086492	2086492	10.98	10.98	-	
	<ul> <li>(ii) Individual shareholders holding nominal share capital up to Rs.1 lakh</li> </ul>	14260	5250689	5236468	27.62	27.62		:
	(ii) Individual shareholders holding nominal share copital in	•						
	Any Others	43	Suda-CL.	TOSOTOS	6.0/	6.07		
	Clearing Members	24	7051	7051	0.04	0.04		
	Non Resident Indians	46	61712	61712	0.32	0.32		
	Sub-Total (B)(2):	14763	8560552	8441831	45.03	45.03		
	Total Public Share Holding (B)=(B)(1)+(B)(2):	14764	8561252	8442531	45.03	45.03	¥	AN
	100,000							
	10731 (A)H(B) :	14791	19011066	18706425	100.00	100.00		
. <u>(</u> )	Shares held by custodians, against which Depository Receipts have been issued	0	0		000	o o	NA	NA
	GRAND TOTAL (A)HB)H(C):	14791	19011066	18706425	100.00	100.00	0	0.00





	(I)(b)STATEMENT SHOWING SHAREHOLDING OF PERSONS BELONGING TO "PROMOTER AND PROMOTER GROUP"	BELONGING TO "PROMO	TER AND PROMOTER G	roup"		
SLNO	NAME OF THE SHAREHOLDER	TOTALSH	TOTAL SHARES HELD	SHARES PLEI	SHARES PLEDGED OR OTHERWISE ENCUMBERED	CUMBERED
						AS A PERCENTAGE OF
			AS A % OF GRAND			A GRAND TOTAL
!		NUMBER OF SHARES	TOTAL (A)+(B)+(C)	NUMBER OF SHARES	AS A PERCENTAGE	(A)+(B)+(C) OF SUB
ε	(11)	(III)	(A)	ω	(VI)=(V)/(HI)*100	(All)
	KAMDHENU OVERSEAS LIMITED	2399973	12.62	0	0	0
	2 KAMDHENU INDUSTRIES LIMITED	829700	4.36	0	0	0
	3 SHAFALI AGRAWAL	701942	3.69	0	0	0
	4 SARITA AGARWAL	993700	3.49	0	0	0
	S SATISH KUMAR AGARWAL	577122	3.04	0	0	0
*	GPRADEEP KÜMAR AGARWAL	533914	2.81	0		0
	7 SUMIL KUMAR AGARWAL	513933	2.70	0	0	0
	8 GEETA AGARWAL	499700	2.63	0	0	0
<b>V</b> 1	9 RADHA AGARWAL	383100	202	0	0	0
T,	10 SATISH KUMAR AGARWAL	365900	1.92	0	0	0
	11 SHATUL AGARWAL	337700	1.78	0	0	0
1;	12 SUNIL KUMAR	1082008	158	0	0	٥
	SACHIN AGARWAL	277280	1.46	O	0	0
7.	14 SAURABH AGARWAL	276500	1.45	Ö	0	0
	15 KAMDHENU CEMENT INDUSTRIES LIMITED	250000	1.32	0	0	0
31	16 SHIVANI AGARWAL	240235	1.26	0	0	0
17	17 PRIYANKA AGARWAL	231129	1.22	0	0	0
**	18 ACHIN AGARWAL	185920	86:0	0	0	o
3	1918hita agarwal	145716:	0.77	0	0	o
2	20 SOMYA AGARWAL	144660	0.76	0	0	0
2	21 KARTIK AGGARWAL	138400	0.73	0	0	o
7	22)KAMDHENU CONCAST UMITED	125510		0	0	0
22	23 SUNIL KUMAR AGARWAL	100000	0.53	0	0	0
72	24 AYUSH AGARWAI.	90600	0.48	0	0	0
۲3 	25 SWREYA AGARWAL	61900	0.33	0	0	O
%	26 АҮՍՏН АGARWA1	20000	0.26	0	0	,0
27	27¦ACHIN AGGARWAL	25000	0.13	0	0	Ô
	TOTAL	10449814	54.97	0	00'0	0.00

<u>भरत</u> ्रं झकाल	Shares as a percentage of total number of shares (i.e., Grand Total (AHBHC) indicated in Statement at para (IXa) above)	, 1.23	1.23
Public and holding more than 1% of the total num	Number of shares Share	234500	234500
UNCERTENCENT Shareholding of persons belonging to the category. Public" and holding more than 124 of the total number of shares	Name of the shareholder	Three Dee Exim Private Limited	TOTAL
	Sr No.	r. H	

Shareholders/Promote Total (A/HE/HC) indicated in Statement at para (I)(a) above) rs/Public) TOTAL 0

Sr No.	Type of outstanding DR (ADRs, GDRs, SDRS, etc.)	Number of outstanding DRs	Shares underlying	Shares underlying outstanding DRs as a	
			outstanding DRs	percentage of total number of shares (i.e.,	
1	Global Depository Receipts (GDRs)	0	00'0	0	
		-		0	
	TOTAL	0	00:0	00:00	
	(II)(b) Statement showing Holding of Depositon	(III)(b) Statement showing Holding of Depository Receipts (DRS), where underlying shares are in excess of 1% of the total number of shares	otal number of shares		
Sr No.	Name of the DR Holder	Type of outstanding DR (ADRs, GDRs, SDRs, etc.)	Shares underlying	Shares underlying outstanding DRs as a	
			outstanding DRs	percentage of total number of shares (i.e.,	
,	•	*			



Page	1		,	The state of the s	and the state of shares of shares securities is issued by the issuer	shares/securities is issue.	d by the issuer	
10	300	CATEGORY OF SHAREHOLDER	··-					
10			Number of Ve	oting Rights held in each	class of securities	Total Voting Rights	As a continuous at	Total Voting Rights Le(VI)
Machine   Mach		(3)	Class X	Gass Y	Class 2	(III+IV+V)	(A+B)	Ac a storement of the same
1900   1900	ا د	PROMOTER AND PROMOTER GROUP 2		(IV)	Ξ	S	S/ED/	As a percentage of (A+8+C)
Individuals / Hindu Undividual Family     Control Government/State Government/ State Government/ State Government/ State Government/ State Government/ State Government Bodies Corporate Financial Institutions / Banks		INDIAN		-				()110
Central Government/State Government    Bodies Corporate   Financial Institutions / Banks     Bodies Corporate   Financial Institutions / Banks     Any Others   Sub-Total (A)(1) :   Bodies Corporate   Financial   Bodies Corporate     Institutions   Banks     Any Others   Sub-Total (A)(2) :   Sub-Total (A)(2) :   Sub-Total (A)(2) :   Any Others     Sub-Total (B)(1) :   FOREIGN   Financial Investors     Any Others     Foreign Institutions   Banks     Foreign Institutions     Foreign Institutions   Banks     Foreign Institutions   Banks     Foreign Institutions     Foreign Institutions     Foreign Institutions     Foreign Venture Capital Investors     Foreign Institutions     Foreign Venture Capital Investors     Foreign Venture Capital Invest		Individuals / Hindu Undividend Family						
Bodies Corporate   Financial Institutions / Banks		Central Government/State Government(s)						
Financial Institutions   Banks		Bodies Corporate						
Sub-Total (A) (1):  Sub-Total (A) (1):  FOREIGN Individuals (NRIs/Foreign Individuals) Individuals (NRIs/Foreign Individuals) Individuals (NRIs/Foreign Individuals) Individuals (NRIs/Foreign Individuals)  Total Share Holding of Promoter and Pro (A)=(A)(A)(H)(A)(2):  Total Share Holding of Promoter and Pro (A)=(A)(A)(H)(A)(2):  Total Share Holding of Promoter and Pro (A)=(A)(A)(H)(A)(2):  Total Share Holding (B) (B)  Sub-Total (B)(1):  Sub-Total (B)(1):  Sub-Total (B)(1):  Sub-Total (B)(2):  Sub-Total (B)(2):  Sub-Total (B)(2):  Sub-Total (B)(2):  Total (A)(B):  Sub-Total (B)(2):		Financial Institutions / Banks						
Sele Treat (ALIE):    Particular Selection		Any Others						5
Colore								
Coldisor		Sub-Total (A) (1) :			-			
Participate (New Joseph Participate)  Participate (Angle)  Tradicipate (Angle)  Participate (								
Execution   Exec		FOREIGN						
March English   Part College   Promote and Promoter Group   Part College   Part Co		Individuals (NRIs/Foreign Individuals)						
Variable of the Period of th		Bodies Corporate						
May Others  Why Others  Was Closed (A)(2):  Total State Hodding of Memorier and Promoter Group  (A)-MANI-MARIA  (A)-MANI-MARI-MARIA  (A)-MANI-MARIA  (A)-MANI-MARIA  (A)-MANI-MARI-MARIA  (A)-MARI-MARIA  (A)-MARI-MARI-MARIA  (A)-MARI-MARI-MARI-MARI-MARI-MARI-MARI-MARI		Institutions						
Total Industry Holding Street Holdin		Any Others						
Total Stare Holding of Pennoter and Promoter Group		Sub-Total (A)(2) :	7.4					
Mode All English and Promoter Group   Mode All English   Mode All En								
PUBLIC SMERRICHONG 3 MONTHOUSE MANAGEMENT CONTROL STATE CO		ocal brane noting of Promoter and Promoter Group  Abs/Abth-Abth-						,
FIGURE SERVER CONTINUES   FIGURE SERVER SER		(5W3). (5W3)						
Mythati Grade Lynn Grade de Charle Covernment (s) Grade de Charle Charle Charle Grade Charle Charle Foreign Verture Capital investor Foreign Verture Capital investor Foreign Verture Capital investor Foreign Verture Capital investor Any Charle (byl.)  NON-MESTITUTION Sub-Total (byl.)  Total (byl.)  Sub-Total (byl.)		PUBLIC SHAREHOLDING 3						
Manual squide // UT    Control Contr		INSTITUTIONS						
Giracoid Institutions (Panis)   Venture Capital Funds   Venture Fund		Mutual Funds /LT						
Central Government(s)  Central Government(s)  Incurate Comparies  Incurate Comparies  Foreign Institutional Investors  Foreign Institutional Investors  Foreign Institutional Investors  Foreign Institutional Investors  Any Others  Sub Total (e)(1):  Models Sub Total (e)(1):  Foreign Comparies  Foreign Institutional Investors  Foreign Institutional Institutio		Financial Institutions /Banks						
Vertice Capital Eurobia   Contracted Capital Investors     Principle Capital Investors		Central Government / State Governmentic)						
Incurance Companies		Venture Capital Funds						
Foreign Integrational Integrors		Insurance Companies						
Portign Venture Capital Investors		Foreign Institutional Investors						
Anv Others  Sub-total (e)(1):  NON-LANSTITUTIONS  Redies Corporate Individuals shareholders holding nominal share capital up to life in land shareholders holding nominal share capital up to life. I lab.  Individuals shareholders holding nominal share capital up to excess of 62, 1 lab.  Individual shareholders holding nominal share capital in excess of 62, 1 lab.  Anv Others Corporate Individual shareholders holding (B)—(B)(13)+(B)(2):  Total Public Share Holding (B)—(B)(13)+(B)(2):  Total (B)(B):  Sub-Total (B)(2):  Total (B)(B):  Sharehold (B):  Sharehold (B):  Sharehold (B):  GRAND TOTAL (A)+(B)+(G):	1	Foreign Venture Capital Investors						
Sub-Total (B/L):   NOX-HASTITUTIONS   Bodies Corporate   Individuals	T	Any Others						
NON-MESTITUTIONS	T							
NOW HASTILUTRIONS   Bodiet Carporate	1	Sub-Total (B)(1):						
Booker Correct   Brooker Correct   Brooker Correct   Individual share capital up to   Individual share holding nominal share capital up to   Individual shareholders holding nominal share capital in   Individual shareholding shareholding nominal share capital in   Individual shareholders holding sha	1							
Models Comparate   Individuals Comparate   Individuals Comparate   Individuals   Individuals Share capital up to   Rs. 1 Bids     (i) Individual shareholders holding nominal share capital up to   Rs. 1 Bids     (iii) Midnight shareholders holding nominal share capital in   Rs. 1 Bids     (iii) Midnight shareholders holding nominal share capital in   Rs. 1 Bids     (iii) Midnight shareholding (B)=(B)(13)+(B)(2)     Sub-Total (B)(2)     Total Public Share Holding (B)=(B)(13)+(B)(2)     Total (A)+(B)     Shares held by custodians, against which Depository Receipts     Ashe been issued   Rs. 1 Bids     GRAND TOTAL (A)+(B)+(C)     GRAND TOTAL (A)+(B)+(C)     Comparation   Comparatio		NON-INSTITUTIONS						
Individuals   Individual share capital up to   It is individual share capital up to   It is individual share capital up to   It is individual shareholders holding nominal share capital in   It is individual shareholders holding nominal share capital in   It is individual shareholders holding nominal share capital in   It is individual shareholding nominal share capital in   It is individual shareholding [Bj=[Bi]3]+[Bi]2]   It is individual shareholding [Bj=[Bi]3]+[Bi]3]   It is individual	1	Sodies Corporate						
RS. Takih Individual shareholders holding nominal share capital up to   RS. Takih   Individual shareholders holding nominal share capital in   excess of Rs. I lakh   Individual shareholders holding nominal share capital in   excess of Rs. I lakh   Individual shareholders holding nominal share capital individual shareholders holding   Individual shareholding   Individual shareho	1	ndividuals				-		
if a Linding   in a		i) individual shareholders holding nominal share capital up to						
Ever and four an investigation of the capital in ever and four floating from the capital in ever and four floating float	T	S. 13akh St Archier				=		
Any Chicks  Clearing Members  Clearing Members  Non Resident Indians  Sub-Total (BIZ):  Total (AHB):  Shares held by custodians, against which Depository Receipts  have been issued  GGAND TOTAL (AHB)+(C):		ii) maividual shareholders holding nominal share capital in						
Clearing Members	Ť	De Others			·			
Non Resident Indians  Sub-Total (B/Q):  Total (A)HB):  Total (A)HB):  Shares held by custodians, against which Depository Receipts have been issued  GRAND TOTAL (A)HBH(C):	۲	Jeaning Members						
Sub-Total (B)(2):  Total (A)(B):  Total (A)(B):  Shares held by custodians, against which Depository Receipts have been issued  GRAND TOTAL (A)-(B)-(C):	Ī	Ion Resident Indians						
Sub-Total (B)(Z): Total Public Share Holding (B)=(B)(3)+(B)(Z): Total (A)+(B): Shares held by custodians, against which Depository Receipts have been issued GRAND TOTAL (A)+(B)+(C):	尴							
Sub-Total (B)(2):  Total (A)(B):  Total (A)(B):  Shares held by custodians, against which Depository Receipts have been issued GRAND TOTAL (A)(B)+(G):								
Total Public Share Hoking (B)=(B/L3)+(B/L2):  Total (A)+(B): Shares held by custodians, against which Depository Receipts have been issued  GRAND TOTAL (A)+(B)+(C):		Sub-Total (B)(2):						
Total (A)H(B):  Total (A)H(B):  Shares held by custodians, against which Depository Receipts have been issued  GRAND TOTAL (A)H(B)H(C):	Н							
Total (AH(B): Shaves held by custodians, against which Depository Receipts have been issued GRAND TOTAL (AH(B)+(C):	H	Total Public Stare Holding (B)=(B)(1)+(B)(2):						
Total (AHB): Shares held by custodians, against which Depository Receipts have been issued GRAND TOTAL (AHB)HC):	1							
Shares held by custodians, against which Depository Receipts have been issued GRAND TOTAL (AH(B)HC):	†	Total (A)+(B) :						
Shave been issued have been issued GRAND TOTAL (AH/B)HC):	ť							
GRAND TOTAL (AHIBHC):	7 =	lares new Dy custodians, against which Depository Receipts  ave been issued				`\	<del> </del> -	
GRAIND TOTAL (AH(BHC):	$\exists$		1			,		
	┪	GRAND TOTAL (A)HB)H(C):						

NAME OF THE COMPANY: KAMEDHENU ISPAT LTD



QUARTER	ENDED : 30.06.2010							
CATEGORY				NUMBER OF SHARES	TOTAL SHAREHOLDING	TOTAL SHAREHOLDING AS A PERCENTAGE OF	SHARES PLEDGEL	SHARES PLEDGED OR OTHERWISE
3000	CATEGORY OF SHAREHOLDERS	NUMBER OF	TOTAL NUMBER	HELD IN	TOTAL NUMB	TOTAL NUMBER OF SHARES	ENCUR	ENCUMBERED
		SHOWER COUNTY	SHAKES	DEMATERIALIZED	AS A PERCENTAGE OF (A+B) 1	AS A PERCENTAGE OF (A+B+C)	NUMBER OF SHARES	AS A PERCENTAGE
(A)	PROMOTER AND PROMOTER CROTTER	(1)	(1)	3	(ivi)	(tiv)	(vm)	(IX)=(VIII)/(IV)*100
	INDIAN							
	Individuals / Hindu Undividend Family	23	6814230	6628310	35.84	35.84		
	Central Government/State Government(s)	0		0			0	
(0)	Bodies Corporate	4	362508	3605083	18.96	18.96		0.00
(0)	Francial Institutions / Banks	Ö	i i	0			0	
į,	Any Coners	0	Ö	0		0.00		0.00
	Sub-Total (A) (1)	7,6	01001001	roccor.	1			
		12		5658207	24.81	54.81	0	00'0
(2)	FOREIGN							
(e)	individuals (NRis/Foreign individuals)	0	ò	0	00.0	000		
(a)	Bodies Corporate	0		0		000		
2	Institutions	0		0			0	
9	Any Others	٥	0	0		00.0		,
	Sub-Total (A)(2):	0	0	0				0.00
	Total Chart Holding of December and Business							
	(A)=(A)(1)+(A)(2)	27	10419313	10233393	54.81	54.81	C	DOO
(8)	e punto i Crista di Silia da							
ΞΞ	INCITITIONS						Ā	NA NA
9 (9	Mutual Funds /UTI						άZ	NA
<u>آ</u>	Financial Institutions /Banks		000	000	0.00			
[ -	Central Government / State Government(s)	7		30/	0.00			
(P	Venture Capital Funds	100	5 6	5	0.00	İ		
(e)	Insurance Companies	0		0	800			
(i)	Foreign Institutional Investors	0	1000	0	0:00	0.00		
	Foreign Venture Capital Investors	0		0	0:00	00'0		
Ē	Any Others	0	0	0	00:0	00:00		
	Cost Today (Diffe)							
	: (71/4) : 201-000	1	200	700	00:0	0.00		
l <sub>2</sub>	NON-INSTITUTIONS							
(0)	Bodies Corporate	415	1983678	1083670	CVUL	c, c,	¥.	ΥA
(9)	Individuals		2000	7202010	STOT	10.43		
	(i) Individual shareholders holding nominal share capital up to Rs. I lakh	14270	23000	0.00	3			
	(ii) individual shareholders holding nominal share capital in		0000000	0404020	78.95	78.90		
	excess of Rs.1 lakh	396	1058968	954465	5.57	5.57		
J	Any Others							
Ţ	Clearing Members	30	14685	14685	80.0	80.0		
	Non Resident Indians	47	84869	84369	0.45	0.45		
	Sub-Total (B)(2):	14909	8591053	8472332	45.19	45.19		
	lotal rubiic Share Holding (B)=(B)(1)+(B)(2)	14910	8591753	8473032	45.19	45.19	NA	NA .
	Total (A)+(B)	14937	19011066	18706425	100.00	100.00		
1								
3	Shares held by custodians, against which Depository Receipts	-					NA.	AN
	וופער טבבוו וצאמינים	5	6	5	00:0	0.00		
	GRAND TOTAL (A)+(B)+(C):	14937	19011066	18706425	00 001	100.001	-	86
								1



	MANAGEMENT CLANINGS					, 4
ON THE	NAME OF THE SHAREHOLDER	BELONGING TO "PROMO	DTER AND PROMOTER G	ROUP"		
		TOTAL SH	TOTAL SHARES HELD		SHARES DI EDICED OD OTHERS	
				-	DOCU ON UI MERWISE EN	CUMBERED
٤			AS A % OF GRAND			AS A PERCENTAGE OF
	1 KAMDHEWI CALEGORIA	NUMBER OF SHARES	TOTAL (A)+(B)+(C)	NUMBER OF SHARES	AS & DEOCEMBAGE	A GRAND TOTAL
	2 KANAGALISTIN		(2)	8	T	AH(B)H(C) OF SUB
	Z. SZWOŁENU INDUSTRIES LIMITED	2399873	12.67		007_(IIII)/(A)=(IA)	J. J.
	S-A-AL AGRAWAL	00/258	4 35		0	Ö
	4 SAR A AGARWAL	701942	00'4		0	
	SATS-KUVARAGARVIAL	663700	92.5		0	6
	6:04ADEP KUWAA AGASWAL	577232			0	ō
	7.SUNIL KUMAR AGARWAL	513933	3.04	0	0	
~	8:GEETA AGAWAL	\$65533	1036	0	0	6
	9 443-4 AGARWAL	VVC267	00.7	0	0	
9	10:SATISH KUMAR AGARWAI	203:00	2.60	6	0	5 6
	CALATIC ACADINA	265,000	2.02	0		٥
	יייין פֿר אַפּאַראַראַליי	365900	1.92	c		0
	A SANIE CONTA	337700	1.78			0
1.3	13 SACHIN AGARWAL	300280	85	5 7	0	3
77	1415AURABH AGARWAL	277280	30.5	0	0	0
Şį	15:KAMDHENU CEMENT INDUSTRIES LIMITED	276500	1976		0	0
91		250000	100	•     	0	G
17	1719RIYANKA AGARWAL	240235	901	0 6	0	0
200	18'ACHIN AGARWAL	231129	2.1	5 6	0	6
19	19 SHITA AGARWAL	185920	80 0	5	0	, ,
8	20:SCMVA AGARWAL	145716	22.0	0	0	0
7	ZI:YARTIK AGGARWAL	144660	0.76		0	0
3 :     	422: SAMDHENU CONCAST LIMITED	138400	57.0	1		0
2	23: SUMIL KUMAR AGARWAL	125510	0.66	5 6	0	0
157	24/AYUSH AGARWAL	000001	0.53	0	0	0
Ö	23.5HREYA AGARWAL	00906	0.48	3	٥	Ö
ė į	Zel AYUSH AGARWAL	00619	0.33	3 6	6	0
27	27/ACHIN AGGARWAL	20002	0.26		0	6
	TOTA	25000	61.0	5	0	Г

	otal number of shares	Shares as a percentage of total number of shares (i.e., Grand Total (A)+(B)+(G) indicated in Statement at para (illa) show)	11
of persons belonging to the category "buship" and belong	and note than 1% of the total r	Number of shares	224500
TOTAL STATE OF THE PROPERTY OF	Sr No.	Three Dee Etim Private Limited	TRICE

-		Locked-in shares as a percentage of total number of shares 11 A Comment	Total (A)+(B)+(C) indicated in Statement at para (I)(a) above)		
	d) Statement showing details of locked-in shares	Category of Number of locked-in shares shareholders(Promote			
	Name of the shareholder			TOTAL STATE OF THE	
	SrNo				

ttement showing details of Depository Receipts (DRs) Number of contents of con	Shares underlying Shares underlying outstanding Decea	O cutstanding Dies percentage of total number of shares II.e.	0 000	0 000
Type of outstanding DR (ADRs, GDRs, SORS, etc.)	Global Depository Receipts (GDB-1	(202)	TOTAL	
Sr No.	++			

	Shares underlying outstanding DRs as a percentage of total number of shares (Le., 0
in excess of 1% of the total number of shares	Shares underlying outstanding DRs
e bolding of Depository Receipts (DRS), where underlying shares are in excess of 1% of the total number of	O Carried use Statement and the Carried Stat
(II)(b) Statement showing Holding of Deposit ne of the DR Holder	0 77A.
Sr No. Nam	10



	the state of the s		December of the control of	States, securities is issued	1 by the issuer	
CALESCORI CH SHAREHOLDER	Number of Vot	ing Diches hald in a section				Total Voting Rights i.e(VI)
		Clace Y	lass of securities	Total Voting Rights	As a percentage of	
(ii)	1	1	-	(MHV+V)	(A+B)	As a percentage of (A+B+C)
PROMOTER AND PROMOTER GROUP 2			(6)	(g)	(M1)	(VIII)
3.410.1	1					
Financial institutions / Banks						
Any Uners			-			is .
	`}_					
FOREIGN						
ind yours (Nais/Foreign individuals)						
Bod'es Caradrate						
short attack						
.Any Others						
Sub-Total (A)(2) :						
Total Share Holding of Promoter and Promoter Group						5
(A)=(A)(1)+(A)(2)						
PUBLIC SHAREHOLDING 3						
INSTITUTIONS						
Section - ches / CTI						
Friedricial Institutions / Banks						
Menting Covernment / State Government(s)		-				
lostropes Companies						
Company (control of the control of t						
Foreign Venture Court						
Any Others						
Sub-Total (8)(1) ·						
(=)(=)						
MON-INSTITUTIONS						
Bodies Corporate						
Individuals						
(i) Individual shareholders holding nominal share capital up to						-
Rs.1 lakh		_	-			
(ii) Individual shareholders holding nominal share capital in						
excess of Rs. I lakh			-			
Clearing Members						
Mon Decident Later						
Supplied the suppl						
Sub-Total (B)(2):						
Total Public Share Holding (B)=(B)(1)+(B)(2)	-					
Total (A)+(B) :						
Shares held by custodians, against which Danniston Daniston						
have been issued						
					1	
GRAND TOTAL (A)+(B)+(C):			-			
	PROMOTER AND PROMOTER GROUP   INDIAN	PROMOTER AND PROMOTER GROUP 2   INDIAN   INDIA	PROMOTER AND PROMOTER GROUP 2   INDIAN   INDIA	PROMOTER AND PROMOTER GROUP 2   Class X	PROMOTER AND PROMOTER GROUP 2   INDIAN   INDIA	Note   Control   Control