

Pali Commercial Company Limited

32, EZRA STREET, ROOM NO.-755, 7TH FLOOR, KOLKATA - 700 001

Annexure A

Format of disclosure of holding of specified securities

| | | |
|----|---|---|
| 1. | Name of Listed Entity | Pali Commercial Co Ltd |
| 2. | Scrip Code/Name of Scrip/Class of Security | |
| 3. | Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c) | |
| a. | If under 31 (1)(b) then indicate the report for Quarter ending | For the Quarter ended (4 th Quarter) i.e. 31/03/2019 |
| b. | If under 31 (1)(c) then indicate date of allotment/extinguishment | |

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.

5. The tabular format for disclosure of holding of specified securities is prescribed by SEBI.



PALI COMMERCIAL CO. LTD

Vinita Khaitan

MANAGING DIRECTOR

| Category (I) | Category of shareholder (II) | Nos. of shareholders (III) | No. of fully paid up equity shares held (IV) | No. of Partly paid-up equity shares held (V) | No. of shares underlying Depository Receipts (VI) | Total nos. shares held (VII)=(IV)+(V)+(VI) | Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) As a % of (VI+B+C2) | Number of Voting Rights held in each class of securities (X) | | | No. of shares underlying outstanding convertible securities (including Warrants) a % of (A+B+C) (X) | 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) | Number of Locked in shares (XII) | | Number of shares pledged or otherwise encumbered (XIII) | Number of equity shares held in dematerialized form (XIV) |
|--------------|--------------------------------|----------------------------|--|--|---|--|---|--|-----------|---------------|---|---|----------------------------------|---------------------------------|---|---|
| | | | | | | | | Class eqx | Class eqy | Total | | | No. (a) | As a % of total shares held (b) | | |
| (A) | Promoter & Promoter group | 2 | 10070 | 0 | 0 | 0 | 1.07% | 0 | 0 | 10070 | 1.07 | 0 | 0 | 0 | 0 | 0 |
| (B) | Public | 28 | 979990 | 0 | 0 | 0 | 98.99% | 0 | 0 | 979990 | 98.99 | 0 | 0 | 0 | 0 | 0 |
| (C) | Non Promoter - Non Public | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | NA | 0 |
| (C1) | Shares underlying DRs | 0 | 0 | 0 | 0 | 0 | NA | 0 | 0 | 0 | 0 | 0 | 0 | 0 | NA | 0.00000 |
| (C2) | Shares held by Employee Trusts | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | NA | 0.00000 |
| | Total | 30 | 990000 | 0 | 0 | 0 | 100% | 0 | 0 | 990000 | 100 | 0 | 0 | 0 | NA | 0 |



PALI COMMERCIAL CO. LTD
Vinay Pradhan
 MANAGING DIRECTOR

| (1) Category & Name of the Shareholders (I) | PAN (II) | Nos of shareholders (III) | No of fully paid up equity shares held (IV) | Partly paid-up equity shares held (V) | Nos of shares Depository Receipts (VI) | Total nos shares held (VII)=(IV)+(V)+(VI) | Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) (VIII) | Number of Voting Rights held in each class of securities (IX) | | | No of shares outstanding convertible securities (including Warrants) (X) | 9 as a % of fully convertible securities (XI)=(V)+(VI)+(X) As a % of (A+B+C2) | Number of Locked in shares (XII) | Number of shares pledged or otherwise encumbered (XIII) | Number of shares held in dematerialized form (XIV) |
|---|------------|---------------------------|---|---------------------------------------|--|---|---|---|---------|-------|--|---|----------------------------------|---|--|
| | | | | | | | | Class X | Class Y | Total | | | | | |
| (a) Individual/Promoter undivided Family | | 2 | | | | | | | | | | | | | |
| 1 Shri Kumar Dikshita | AGRPD716AM | 0 | -10 | | 0 | -10 | 0.001 | 0 | 0 | 0 | 10 | 0.001 | | | |
| 2 Smta Ram Parvati | AFSP7645D | 0 | 10000 | | 0 | 10000 | 1.01 | 0 | 0 | 0 | 10000 | 1.01 | | | |
| (b) Central Government/State Government(s) | | | | | | | | | | | | | | | |
| (c) Financial Institutions/Banks | | | | | | | | | | | | | | | |
| (d) Any Other (Specify) Bodies Corporate | | | | | | | | | | | | | | | |
| Sub Total | | 2 | 10010 | | 0 | 10010 | 1.011 | 0 | 0 | 0 | 10010 | 1.011 | | | |
| (2) Foreign Individuals (Non-Resident Individual/Foreign Individuals) | | | | | | | | | | | | | | | |
| (b) Government | | | | | | | | | | | | | | | |
| (c) Institutions | | | | | | | | | | | | | | | |
| (d) Foreign Portfolio Investor | | | | | | | | | | | | | | | |
| (e) Any Other (Specify) | | | | | | | | | | | | | | | |
| Sub Total | | 0 | 0 | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| Total Shareholding of Promoter and Promoter Group (A)+(X)+(XIV) | | 2 | 10010 | | 0 | 10010 | 1.011 | 0 | 0 | 0 | 10010 | 1.011 | | | |



PALI COMMERCIAL CO. LTD
Vinita Kulkarni
MANAGING DIRECTOR

| (1) Category & Name of the Shareholders (I) | PAN (II) | Nos. 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, 1957) As a % of (A+B+C2) (VIII) | Number of Voting Rights held in each class of securities (IX) | | | Total as a % of Total Voting Rights (X) | No. of shares of underlying convertible securities (including Warrants) (XI) | Shareholding as a % of convertible securities (as a percentage of diluted share capital) (X)=(VII)+(XI) As a % of | Number of Locked in Shares (XII) | As a % of total shares held (b) (XIII) | No. (Not pledged or otherwise) (XIV) of total shares held (Not pledged or otherwise) (XIV) (Not applicable) (XIV) | Number of equity shares held in dematerialized form (XV) |
|---|----------|----------------------------|--|---------------------------------------|--|--|--|---|---------|-------|---|--|---|----------------------------------|--|---|--|
| | | | | | | | | Class x | Class Y | Total | | | | | | | |
| (a) Mutual Funds / UTI | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (b) Venture Capital Funds | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (c) Alternate Investment Funds | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (d) Foreign Venture Capital Investors | | | | | | | | | | | | | | | | | |
| (e) Foreign Portfolio Investors | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (f) Financial Institutions / Banks | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (g) Insurance Companies | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (h) Provident Funds / Pension Funds | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (i) Any Other (specify) | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (1) Sub Total | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (2) Central Government / State Government(s) / President of India | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (3) Non-Institutions | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (a) Individuals | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |



PALI COMMERCIAL CO. LTD
Nishita Bhattacharya
MANAGING DIRECTOR

| Category & Name of the Shareholder (I) | PAN (II) | Nos. 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, 1957 As a % of (A+B+C2) (VIII) | Number of Voting Rights held in each class of securities (IX) | | | No. of Underlying convertible securities (including Warrants) (X) | Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)=(VII)+(X) As a % of | Number of Locked in shares (XII) | | Number of shares held or offered or encumbered (XIII) as a % of total shares held in the company (Not applicable) (XIV) | Number of dematerialized shares held in the company (Not applicable) (XV) |
|---|-------------|----------------------------|--|---------------------------------------|--|--|---|---|---------|--------|---|--|----------------------------------|---------------------------------|---|---|
| | | | | | | | | Class X | Class Y | Total | | | No. (a) | As a % of total shares held (b) | | |
| 1 Narendra Day Narayan | | 0 | 10 | 0 | 0 | 10 | 0.001 | 0 | 0 | 10 | 0.001 | 0 | 0 | 0 | 0 | 0 |
| 2 Pramod Kumar Sarangi | | 0 | 10 | 0 | 0 | 10 | 0.001 | 0 | 0 | 10 | 0.001 | 0 | 0 | 0 | 0 | 0 |
| 3 Deepi Nandan Dhanuka | | 0 | 10 | 0 | 0 | 10 | 0.001 | 0 | 0 | 10 | 0.001 | 0 | 0 | 0 | 0 | 0 |
| 4 Radha Shyam Sinha | | 0 | 10 | 0 | 0 | 10 | 0.001 | 0 | 0 | 10 | 0.001 | 0 | 0 | 0 | 0 | 0 |
| 5 Brood Kumar Jalan | | 0 | 10 | 0 | 0 | 10 | 0.001 | 0 | 0 | 10 | 0.001 | 0 | 0 | 0 | 0 | 0 |
| 6 Ashok Kumar Arampal | | 0 | 20000 | 0 | 0 | 20000 | 2.02 | 0 | 0 | 20000 | 2.02 | 0 | 0 | 0 | 0 | 0 |
| 7 Individual shareholders holding nominal share capital upto Rs.2 lakhs | | 22 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | NA | 0 |
| 1 Suresh Kumar Dhanuka | ASGP688656 | 0 | 20010 | 0 | 0 | 20010 | 2.02 | 0 | 0 | 20010 | 2.02 | 0 | 0 | 0 | 0 | 0 |
| 2 Ajit Kumar Khaitan | AEUPK1979H | 0 | 46900 | 0 | 0 | 46900 | 4.74 | 0 | 0 | 46900 | 4.74 | 0 | 0 | 0 | 0 | 0 |
| 3 Sunil Kumar Khaitan | AEZPK6429F | 0 | 46200 | 0 | 0 | 46200 | 4.67 | 0 | 0 | 46200 | 4.67 | 0 | 0 | 0 | 0 | 0 |
| 4 Kamala Devi Khaitan | AAQCH0892D | 0 | 46550 | 0 | 0 | 46550 | 4.70 | 0 | 0 | 46550 | 4.70 | 0 | 0 | 0 | 0 | 0 |
| 5 Bhairav Datta Krishna's Sons (HUF) | AECPK4510D | 0 | 46350 | 0 | 0 | 46350 | 4.68 | 0 | 0 | 46350 | 4.68 | 0 | 0 | 0 | 0 | 0 |
| 6 Anjana Khaitan | AEERPK1088F | 0 | 46300 | 0 | 0 | 46300 | 4.68 | 0 | 0 | 46300 | 4.68 | 0 | 0 | 0 | 0 | 0 |
| 7 Mrs. Udita Khaitan | ALYPK3681J | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 8 Pradeep Kumar Khaitan | AAQHP2089N | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 9 Chirag Khaitan | AEEM12564G | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 10 Piyal Chowdhury | AAQHP2089N | 0 | 44280 | 0 | 0 | 44280 | 4.47 | 0 | 0 | 44280 | 4.47 | 0 | 0 | 0 | 0 | 0 |
| 11 P.K. Khaitan & Sons(HUF) | AAQHP2089N | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 12 Suresh Kumar Murarka | ALYPM4770E | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 13 Anshu Murarka | AAQHP2089N | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 14 S.K. Murarka & Sons | AAQHP2089N | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 15 Nishi Murarka | AAQHP2089N | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 16 Nikunj Khaitan | AAQHP2089N | 0 | 35000 | 0 | 0 | 35000 | 3.54 | 0 | 0 | 35000 | 3.54 | 0 | 0 | 0 | 0 | 0 |
| 17 Sunil Kumar Khaitan & Sons | AAQHP2089N | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 18 Nilesh Khaitan | AAQHP2089N | 0 | 40000 | 0 | 0 | 40000 | 4.04 | 0 | 0 | 40000 | 4.04 | 0 | 0 | 0 | 0 | 0 |
| 19 Shivani Murarka | AAQHP2089N | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 20 Sheela Khaitan | AAQHP2089N | 0 | 45000 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 45000 | 4.55 | 0 | 0 | 0 | 0 | 0 |
| 21 Vinia Khaitan | AAQHP2089N | 0 | 46600 | 0 | 0 | 46600 | 4.71 | 0 | 0 | 46600 | 4.71 | 0 | 0 | 0 | 0 | 0 |
| 22 Palani Khaitan | AAQHP2089N | 0 | 45950 | 0 | 0 | 45950 | 4.63 | 0 | 0 | 45950 | 4.63 | 0 | 0 | 0 | 0 | 0 |
| Total Public Shareholders | | 28 | 979990 | 0 | 0 | 979990 | 98.99 | 0 | 0 | 979990 | 98.99 | 0 | 0 | 0 | 0 | 0 |
| Total Public Shareholding | | 28 | 979990 | 0 | 0 | 979990 | 98.99 | 0 | 0 | 979990 | 98.99 | 0 | 0 | 0 | 0 | 0 |



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 Pali Commerce Pvt. Ltd.
 Managing Director

- Statement Showing shareholding pattern of the Non Promoter - Non Public shareholder as on 31/03/2019

| (1) Category & Name of the Shareholders (I) | (2) PAN (II) | (3) No of sharehold- ers (III) | (4) No. of fully paid up equity shares held (V) | (5) Partly paid- up equity shares held (VI) | (6) Nos. of shares underlying Depository Receipts (VII) | (7) Total nos. share s held (VII)=(V)+ (VI)+(VI) | (8) Sharehold- ing % calculate d as per SCRR, 1957. As a % of (A+B+C2) (VIII) | (9) Number of Voting Rights held in each class of securities (X) | | | (10) Total as a % of Total Voting rights (X) | (11) No of shares underlying convertible securities (including Warrants) (X) | (12) 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 | (13) Number of Locked in shares (XII) | | (14) Number of shares pledged or otherwise encumbered (XIII) | (15) Number of equity shares held in dematerializ- ed form (XIV) | |
|---|-----------------|--------------------------------------|--|---|---|---|--|---|---------|-------|---|---|---|---|---|--|---|---|
| | | | | | | | | Class x | Class y | Total | | | | (a) No. (a) | (b) As a % of total shares held (b) | | | |
| (1) Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014) | | | | | | | | | | | | | | | | | | |
| (2) Total Non Promoter - Non Public Shareholding (C)=(C1)+(C2) | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | NA | NA | 0 |



PALI COMMERCIAL CO. LTD

Vinika Khatun
MANAGING DIRECTOR